

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

Officer Delegated Decision

Date: 22 December 2021

Ward(s): St Peter's



Subject: New St Peter's people-friendly streets
Low Traffic Neighbourhood trial, with an
exemption for Blue Badge holders

1. Summary

- 1.1. In 2019, the council consulted on its draft Transport Strategy, which 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. Because of the latter, it also forms part of the council's Vision 2030 (Net Zero Carbon) Strategy, which was consulted on in early 2020. Both of these strategies included policies and programmes to introduce low traffic and liveable neighbourhoods borough-wide, and both were adopted by the council's Executive in November 2020.
- 1.2. In response to the Covid-19 public health emergency in early 2020, the council began a listening exercise in May 2020 to help inform this low traffic neighbourhood (LTN) programme.
- 1.3. On 18 June 2020 the council's Executive took the decision to accelerate the delivery of low traffic neighbourhoods, alongside School Streets, pop-up cycle lanes and a lorry control scheme, as part of its people-friendly streets (PFS) programme. With regards to LTNs, the decision was taken to introduce them as trials, to be followed by monitoring and a full public consultation once they had been in place for twelve months.
- 1.4. The first LTN was introduced in St Peter's in July 2020.
- 1.5. There was ongoing monitoring of the scheme with traffic counts taking place approximately six and twelve months after the scheme was operational. Both an interim and a pre-consultation monitoring report was published. This monitoring demonstrated that the scheme is delivering its objectives in terms of reducing motorised traffic within the LTN, reduced levels of speeding, more people cycling, and that it had not led to unacceptable impacts on main and boundary roads, crime and anti-social behaviour (ASB), emergency service vehicle response times and air quality.
- 1.6. In addition to the Commonplace listening exercise (mentioned in 1.2) that informed the LTN design, feedback has been received through correspondence, a trial feedback survey, formal objections and during the full public consultation after 12 months which took place between September and October 2021. Whilst there were views for and against, overall the feedback from the consultation recognised the benefits of the scheme. An analysis of consultation results included the following:
 - 50% of consultation respondents state it is easier to cross the street (compared to 19% who think it is more difficult)
 - 49% state the streets look nice (compared to 20% who think they look worse)
 - 48% state the air is clean (compared to 18% who think it is worse)
 - 47% state there is less noise from motor traffic (23% state there is more)
 - 44% state there is less speeding motor traffic (18% state there is more)
 - 44% state it is easier to get to local shops and services by walking and cycling (19% state it is harder)

- 1.7. From the start of the trial, focused engagement was undertaken with groups representing people with mobility restrictions, as resident impact assessments (RIAs) produced for the scheme and the programme overall had identified potential negative impacts for these groups. On 14 October 2021, the council's Executive took a decision to introduce an exemption policy for Blue Badge holders.
- 1.8. As the monitoring shows that the scheme is meeting its set objectives, and feedback supports the scheme, this report recommends that the LTN remains in place. To address the issue of disabled people who rely on cars for their mobility, in line with the Executive decision from 14 October 2021, a Blue Badge exemption will be introduced as a trial in the St Peter's LTN and monitored. Implementing the Blue Badge exemption alters the nature of the experiment.
- 1.9. This report therefore sets out the council's proposals to make further changes to the St Peter's LTN that will allow Blue Badge holders to register a single motor vehicle for their personal use which is registered to their own address within (or on the boundary of) the low traffic neighbourhood in which they live. A permit will be provided for this vehicle, which will allow the Blue Badge holder to drive, or be driven, through designated camera-enforced filters of the LTN in which they reside.
- 1.10. The exemption will be complemented by an exceptional circumstance dispensation which will have its own application process allowing Blue Badge holder to apply for an exemption if there are particular journeys which require access through a designated filter in the St Peter's LTN. While the proposal makes way for this exceptional circumstance dispensation to take effect it will not be operational until a programme wide policy on this has been agreed. It should be noted this exemption is expected to generate a very low number of additional trips, at such a level that the operation of the scheme should not be significantly impacted.

2. Decision

- 2.1. To note that the original ETO for the St Peter's LTN came into force on 3 July 2020 and that the 18-month expiry date is 2 January 2022, and that an updated ETO came into force on 25 June 2021, predominantly to facilitate the relocation of the Prebend Street filter and introduction of the Coleman Fields filter.
- 2.2. To note the results of the interim and pre-consultation monitoring reports which highlight that the scheme is meeting its objectives through its impacts on traffic volumes, traffic speeds, cycling levels, air quality, with no significant impacts on crime and ASB and emergency services response times.
- 2.3. To note the feedback received from public engagement and the public consultation (held between 13 September and 11 October 2021). More details on this can be found

in the pre-consultation engagement report, found in Appendix 5, and the independently-produced consultation analysis report, found in Appendix 6.

- 2.4. To note that the council's Executive, at its meeting on 14 October 2021, delegated authority to the Corporate Director of Environment, in consultation with the Executive Member for Environment and Transport, to continue the implementation of the people-friendly streets programme through specific schemes and agreed to trial the proposed approach to granting limited exemptions to Islington Blue Badge holders in the LTN, set out at sections 3.3.62 to 3.3.68 of the report to Executive.
- 2.5. To agree that the LTN should continue, with ongoing monitoring to take account of the changes outlined in 2.6
- 2.6. To agree the adoption of proposed measures set out in section 6 of this report, which will allow Blue Badge holders living within or on the boundary of the St Peter's LTN to drive or be driven through designated camera enforced traffic filters in St Peter's LTN, in a vehicle registered at their home address, including the making of traffic orders set out in section 7.
- 2.7. To note that both the original and the updated ETOs will expire on 2 January 2022 and that new ETOs will come into force on 3 January 2022, and that included in the new orders will be the changes outlined in section 6 of this report to implement the proposed modifications to the St Peter's LTN to allow the Blue Badge exemption policy to be implemented.
- 2.8. To note that a final decision will be taken after the expiry of the new six-month statutory objection period for the new ETO to which this delegated decision pertains.

3. Background

- 3.1. The Islington Transport Strategy was consulted on between 29 July 2019 and 29 September 2019, and adopted by the council's Executive in November 2020. The top item of this strategy's strategic vision was: "Motorised through traffic will be removed from local streets and neighbourhoods." Also adopted in November 2020, after consultation earlier in 2020, was Vision 2030: Building a Net Zero Carbon Islington by 2030. This had as a key objective to "Reduce the need for cars by making active travel (i.e. walking, cycling and public transport) the safest, easiest and most enjoyable option. The implementation of the council's borough-wide programme of People Friendly Streets will significantly support this objective." The Mayor's Transport Strategy for London (2018) and central Government policy also evidence a widely recognised need to reduce motor vehicle journeys
- 3.2. Between 2013 and 2019 there was an increase in traffic of almost 10 percent on Islington roads, adding 24.3 million miles to bring the total mileage on Islington's roads in 2019 to 278 million. In the decade since 2009, there has been an increase of over

70% of motorised traffic on London's local roads, which are not designed to take such large numbers of vehicles. These local roads (defined as 'C' or 'unclassified' roads) serve multiple purposes: as places for communities to come together, for play, for local journeys which can be walked, cycled or wheeled (through use of a wheelchair or similar mobility aids). The increase in motor traffic on these streets in the past decade has had a significant impact on the lives of both those who walk, cycle and wheel through those streets, and those who live on them.

- 3.3. 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". 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". This has effectively accelerated the implementation of the long-term plan from the Islington Transport Strategy and Net Zero Carbon Strategy, and progress against wider council ambitions related to public health, road danger reduction, clean air, climate change, social justice, greening and place-making.
- 3.4. On 18 June 2020 the council's Executive took the decision to accelerate the delivery of low traffic neighbourhoods, alongside School Streets, pop-up cycle lanes and a lorry control scheme, as part of its people-friendly streets (PFS) programme. With regards to LTNs, the decision was taken to introduce them as trials, to be followed by monitoring and a full public consultation once they had been in place for twelve months.
- 3.5. The first LTN was introduced in St Peter's in July 2020, however the public consultation was slightly delayed due to the changes made at Prebend Street and Coleman Fields to remove the 'leak' through the Packington Estate. The delay of the consultation allowed some time for people to experience the changes and allowed the council to do more monitoring to understand how the changes affected local traffic levels.
- 3.6. Proposals for the people-friendly streets (PFS) programme were agreed by the council's Executive on 18 June 2020. On 25 June 2020, the council's then Corporate Director of Environment and Regeneration in consultation with the Executive Member for Environment and Transport took the decision to proceed with the St Peter's PFS Low Traffic Neighbourhood (LTN). The PFS programme was further committed to at the council's Executive, at its meeting on 14 October 2021, 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. The wider policy background as well as the more detailed justification for LTNs are set out in Section 3 of the 2021 Executive Report. Policy background on LTNs can be found from section 3.3.1 to 3.3.15 of this report.
- 3.7. Following engagement with several disability representative groups and feedback from local residents, the council has taken note that disabled people who rely on cars for

their mobility are facing increased length, time and cost for journeys, in particular for shorter, local journeys due to LTNs.

3.8. Originally, the LTN programme 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.

3.9. The 2020 Executive Paper was accompanied by a resident impact assessment (RIA), which had identified a series of negative impacts for people who have a protected characteristic, in particular for disabled people. Following this RIA, the council engaged with disabled groups and people with complex mobility needs, reviewed correspondence, LTN trial feedback survey data, Commonplace comments, gathered data on car journey length and times, and reviewed research reports to better understand the nature of the constraints experienced by disabled people who travel by private car.

3.10. This policy proposal was carefully balanced, to take into consideration the reasonable adjustments that this approach will offer to Blue Badge holders who may be disproportionately impacted by longer car journeys against the dilution of the benefits of the LTN for all, including for people with protected characteristics who are disproportionately impacted by traffic. More detail on the careful assessment undertaken by the council is in the October 2021 Resident Impact Assessment, in particular pages 7-10.

3.11. The measures proposed in this report would provide Blue Badge holders living within (and on the boundary roads within) the St Peter's LTN the ability to register a single vehicle to their home address to travel through designated traffic camera enforced traffic filters within the trial scheme areas.

4. Monitoring

4.1. Comprehensive and robust monitoring forms part of the people-friendly streets 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 will also be measured. Monitoring also allows us to track how each scheme is performing against objectives derived from the policies outlined in section 3: 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.

4.2. The full interim and pre-consultation monitoring reports are available at Appendix 8 and 9 of this report. Both reports are also publicly available on the council's website.

Interim monitoring report for the St Peter's Low Traffic Neighbourhood

4.3. As part of the monitoring strategy baseline data was collected before implementation of the Low Traffic Neighbourhood in June 2020 and again collected in November 2020 to produce an 'interim monitoring report'. The data collection includes traffic counts and air quality monitoring within the LTN and on surrounding main roads.

4.4. The interim monitoring report was published in February 2021 and is included as Appendix 8 of this report. The report showed that the project is having the intended impacts in the area of reducing motorised traffic across internal roads (-57%) in line with through traffic restrictions, reducing levels of speeding on internal roads (-65%) and increasing levels of cycling on some internal roads (+43%), while air quality has improved in line with borough trends as levels of nitrogen dioxide have fallen.

4.5. There has been no significant impact on London Fire Brigade response times, or on anti-social behaviour and crime rates.

4.6. Although overall traffic has changed negligibly on boundary roads (-2%) there is a mixed picture in terms of the change in motorised traffic volumes on those roads. Traffic on New North Road – one of the boundary roads surrounding the neighbourhood – rose by 32%. However, journey times have increased by an average of only 26 seconds. This increase could be caused by other factors, such as the work at nearby Old Street roundabout, and the fact the road borders two other LTN trials which started in August 2020, shortly after the St Peter's LTN trial started.

Pre-consultation monitoring report for the St Peter's Low Traffic Neighbourhood

4.7. As part of the monitoring strategy baseline data was collected before implementation of the Low Traffic Neighbourhood in June 2020 and again collected in June 2021 to produce an the 'pre-consultation monitoring report'. The data collection includes traffic counts and air quality monitoring within the LTN and on surrounding main roads.

4.8. The pre-consultation monitoring report was published in September 2021, when the public consultation started, and is included as Appendix 9 of this report. The report showed that the project is having the intended impacts in the area of reducing motorised traffic across internal roads (-56%) in line with through traffic restrictions,

reducing levels of speeding on internal roads (-78%), increasing levels of cycling on internal roads (+72%), while air quality has improved in line with borough trends as levels of nitrogen dioxide have fallen.

4.9. There has been no significant impact on London Fire Brigade response times, or on anti-social behaviour and crime rates.

4.10. Across the boundary roads, total volumes of motorised traffic show a negligible change (1% fall). Traffic on New North Road rose by 24%. Traffic on City Road decreased by a similar amount, indicating that there may have been some redistribution of traffic. The council will continue to monitor this situation and will look at other options if necessary. More recent counts on New North Road taken for the Canonbury East LTN indicate that when comparing June 2020 and July 2021 traffic on New North had only increased by 11% compared to June 2020 – June 2021.

5. Pre-consultation Engagement and Consultation

Pre-consultation Engagement activities

5.1. 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. 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. All this pre-consultation feedback has been analysed and summarised in Appendix 5.

5.2. The **Commonplace interactive tool** was used to carry out a borough wide engagement exercise between 29 May 2020 and 2 March 2021. The exercise asked residents, businesses and local organisations to suggest how local streets can be improved for pedestrians and cyclists. The tool enabled local people to map their comments at specific locations across the borough. The feedback provided during this engagement exercise has guided the development and design of the borough-wide programme of people-friendly streets. Comments have also been isolated to individual areas to gather more information on areas significant to specific schemes.

5.3. At the close of the Commonplace engagement on 2 March 2021, there were 839 comments submitted related to the St Peter's LTN Low Traffic Neighbourhood area (including the boundary roads). 299 comments were received before the first scheme leaflet detailing the proposals of the scheme was delivered in June 2020, and 540 comments were received between June 2020 and 2 March 2021.

5.4. The total amount of individuals who sent **correspondence** regarding St Peter's LTN over the period of advertisement, implementation and pre-consultation amounts to 396. 69% of the correspondence received was categorised as negative, 16% as positive, 8% as mixed and 6% as unclear, and 2% as other topic. Key themes of the correspondence can be found in Appendix 5 Section 3E.

5.5. The St Peter's LTN **trial feedback survey** was open between 8 March 2021 and 13 September 2021. 555 people submitted a survey response. The majority of responses were received at the beginning of the survey period (March 2021) with 379 responses. The trial feedback survey period closed with the start of the public consultation on 13 September 2021. The trial feedback survey results have been analysed and reported on in Appendix 5 Section 3F.

5.6. In the St Peter's trial feedback survey, in answer to the question "What do you like about the trial?" the most common answers were:

- Reduction of through traffic (31%)
- Making the area more pleasant (25%)
- Reduction of air pollution (24%)

5.7. In answer to "What do you dislike about the trial", the most common answers were:

- Increase of traffic on the main roads (54%)
- The lack of early consultation (37%)
- Making cars trips more inconvenient (37%)

5.8. Participants in the survey could select up to four answers for each question (including "I like nothing / I dislike nothing"), so percentages will not sum to 100%.

5.9. The trial feedback survey had four open questions to which 'free text' answers could be given. These questions were:

- Question 5: Are there urgent issues you would like to tell us about? (For example, about road danger or safety - please be as specific as possible).
- Question 6: Do you have other suggestions for what can be done to reduce air pollution and motor vehicle trips in Islington?
- Question 7: Do you have any additional comments?
- Question 9: Which of the following would encourage you to walk, use pavements, wheel or cycle more? (Select all that apply) [The final option to this question was 'Other', with a free text box provided].

5.10. A coding exercise was undertaken to analyse answers to these questions. Of the 555 submissions, 453 contained at least one free text answer to one of these four questions. More information about this analysis can be found in the St Peter's LTN Consultation Report. The most common issues raised in response to these questions (excluding answers coded as 'other') were:

- Increases traffic and pollution on main roads (43%)
- Car trips inconvenient for vehicles (25%)
- Reduces through traffic/air pollution (15%)
- Makes the area more pleasant (14%)

- Access for disabled/elderly/vulnerable more difficult (13%)
- Scheme increases concerns of danger from traffic (11%)

5.11. The council has received 23 **objections** during the six-month statutory objection period which expired on 3 January 2021, and 9 objections so far in the second statutory period which began on 25 June 2021, along with 7 objections that arrived outside of either period. There were an additional 332 objections which have been considered, although they did not refer directly to the St Peter's LTN traffic orders. Officers have coded each objection noting which themes were addressed in each specific objection. The main three topics in the objections were the increase in traffic on boundary roads (72% of objections), negative impacts on vulnerable and disabled people (51%) and requests to allow exemptions for residents, GPs and Blue Badge holders (46%). The themes raised in the objections have been duly considered and responded to in Appendix 5 section 3G and in Appendix 7.

Public consultation

- 5.12. As part of the Executive decision on people-friendly streets, in June 2020 the council committed to undertake 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 remove the 'leak' through the Packington Estate. The delay of the consultation allowed some time for people to experience the changes and allowed the council to do more monitoring to understand how the changes affected local traffic levels.
- 5.13. The consultation took place between 13 September 2021 and 11 October 2021. Results from the consultation questionnaire have been analysed independently by Steer, and can be read in Appendix 6.
- 5.14. The consultation included an online questionnaire available via the Islington website. Paper copies of the questionnaire were also made available at events and could be requested by post.
- 5.15. 1,489 questionnaires were filled in, 1,159 were completed. A questionnaire is classified as complete when respondents have responded to all the questions, however the consultation analysis takes into account all the questionnaires submitted. The questionnaires submitted indicate that 53% of respondents do not live within St Peter's LTN - however if all responses are considered in comparison to the number of residents in St Peter's Ward, this would represent approximately 10% of St Peter's Ward residents.
- 5.16. The council used different ways to promote the consultation. Approximately 10,100 leaflets have been distributed. 9,700 were hand-delivered on day 1 of the consultation (13 September), 400 distributed after complaints (including during scheduled door-to-door knocking activities to residents and businesses), and approximately 480 were

distributed during other scheduled events. The leaflets were distributed in St Peter's and on the two sides of the boundary roads surrounding the area: Wharf Road, City Road, Upper Street, Essex Road, New North Road. Posters were also installed at various locations of high footfall.

5.17. The council also promoted the consultation and encouraged people to fill in the questionnaires at various events. Prior to the consultation, officers and councillors attended the Angel Canal Festival on Saturday 5 September 2021 to share information and raise awareness about the upcoming consultation.

5.18. During the consultation, officers and councillors attended events organised at the following locations and dates:

- On-street event at Duncan Terrace Gardens, Saturday 18 September
- On-street event St James's Church Gardens, Sunday 19 September
- Car free day event outside Hanover Primary School, Wednesday 22 September
- On-street event outside the Duke of Cambridge Pub on Prebend Street, Wednesday 22 September
- Residents door knocking on Wednesday 29 September, targeting streets with low response rates to the online survey
- Business door knocking on Thursday 30 September, targeting businesses within the St Peter's area
- Online session on Zoom, Tuesday 5 October
- Disabled people drop-in event at The ARC Centre on St Paul Street, organised alongside an adapted cycle taster session organised by Pedal Power on Sunday 10 October

5.19. Leaflets and questionnaires were available at all in person events.

5.20. The consultation information was shared on social media platforms including Next door, Twitter, Facebook, and by press release. An email informing people of the consultation was sent to 2,754 Commonplace subscribers and also to the 283 people who had subscribed to email updates via the trial feedback survey.

5.21. The disabled people focussed drop-in event was held on Sunday 10 October from 12-4pm. The event was attended by 30-35 people and provided a space to discuss the St Peter's LTN trial scheme as well as the launch of the London Borough of Islington's Blue Badge Exemption Policy. The key comments at that session are included in Steer's consultation report, which can be found as Appendix 6 of the delegated decision report.

5.22. The key findings from the consultation events are:

- Attendees of the online event were concerned about the effect of the scheme on boundary roads, particularly in regard to pollution.
- Attendees of the online event were concerned about the lack of engagement for those on boundary roads.
- Attendees at the disabled people drop in were concerned that the Blue Badge Exemption Policy only covers one vehicle.

- Attendees at the disabled people drop in were concerned that the Blue Badge Exemption Policy only covers their home LTN and not other areas in Islington.

5.23. The consultation questionnaire was filled in by 1,449 respondents, the detailed findings are included in Steer's report in Appendix 6. Highlights from the analysis include:

- 47% of respondents live in the St Peter's LTN area, and 12% live on a boundary road to the scheme.
- 48% have felt that the air is cleaner since the introduction of the St Peter's LTN trial scheme.
- 7% of respondents who live within the St Peter's LTN area classified themselves with having a disability compared to 15% who live on the boundary roads of the St Peter's LTN area.
- Car ownership of 1 car was higher amongst those who classified themselves as disabled, with 62% having 1 car compared to 51% of those who are not disabled having 1 car.
- Whereas car ownership of 2 or more cars was marginally higher amongst non-disabled people compared to disabled people, with 6% and 7% respectively.

5.24. Analysis of the feedback shows that:

- 44% of respondents stated that they are walking and cycling more to local shops and businesses. 19% disagreed with that statement.
- 46% of respondents stating that it is easier for them to make trips by walking or cycling since the introduction of the St Peter's LTN trial scheme. 19% disagreed with that statement.
- 50% of respondents felt that it was easier to cross the street since the introduction of the St Peter's LTN scheme. 19% disagreed with that statement.
- 47% of respondents have felt like there is less noise from traffic since the introduction of the St Peter's LTN trial. 23% disagreed with that statement.
- The two highest codes which came out of the open question analysis in the survey were 'Concern that the LTN increases vehicle traffic on unsuitable nearby roads/ boundary roads' and 'Concern that the LTN reduces air quality / does not improve air quality'. Those concerns were monitored through data collection in November 2020 and June 2021 and are discussed in Section 10 of this report.

5.25. There were two open questions in the consultation, to which respondents could provide 'free text' answers. These were:

- Question 7: Is there anything else you would like to tell us about your experience of the St Peter's people-friendly streets trial?
- Question 9: Are there issues in the St Peter's area with road danger or safety that you would like to tell us about?

5.26. Another coding exercise was undertaken to analyse answers to these questions. An explanation of how these answers were coded and analysed is given in the independently-produced St Peter's Consultation Analysis Report (Appendix 6). The most common issues raised in answers to these questions were:

- Concern that the LTN increases vehicle traffic on unsuitable nearby roads / boundary roads (18%)
- Concern that the LTN reduces air quality / does not improve air quality (18%)
- Concern that the LTN has caused increased anti-social behaviour / crime / fear of crime due to quieter streets (especially during dark hours / on dimly lit streets (14%)
- Concern that the LTN causes longer journeys due to congestion (particularly Essex Road) (13%)
- Concern about impact on disabled people (8%)
- Concern that people cycle dangerously / speed (8%)

5.27. Looking at the most common issues raised from the trial feedback survey direct questions, and categorised from the trial feedback survey and consultation 'free text' answers, these can be combined to present a set of the most common positive and negative themes which represent overall feedback on the scheme. Negative themes appeared more commonly than positive ones: two of the six questions which had 'free text' answers referred specifically to "road danger or safety", and so elicited answers which were generally negatively-themed.

5.28. The positive themes were:

- Reduction of through traffic;
- More pleasant area;
- Improvement of air quality.

5.29. The negative themes were:

- Increase of traffic on main / boundary roads;
- Inconvenience to car drivers / longer journeys;
- Lack of early consultation;
- Reduction of air quality;
- Increase in crime or anti-social behaviour;
- Impact on disabled people;
- Concerns over dangerous / fast cycling;
- Increased danger from traffic.

Focussed engagement with disability groups

5.30. At the start of the PFS programme and in the Resident Impact Assessment attached to the original St Peter's LTN experimental traffic orders (the RIA was signed on 23 June 2020) the council committed to **engage with disabled groups** to gain a greater understanding of the impacts on disabled people who rely on motor vehicle transport and are therefore more likely to be impacted by different travel routes and a possibly increase in journey time. This engagement took the form of a number of officer meetings with disability groups and groups representing people who have complex mobility needs. Groups met include: Disability Action in Islington, the Carers' Forum, Islington Parents' Forum, London Travel Watch, Transport for All, Keeping Safe sub-

group, Power and Control. Officers have also had email exchanges with Horizon on cycle schemes, low traffic neighbourhoods and pavement obstructions.

- 5.31. Since this original engagement and the announcement of the blue badge exemption policy the council has continued to engage with groups representing people with disabilities through a number of meetings, emails, and drop-in sessions. A more comprehensive summary of the engagement which has taken place with groups representing disabled people can be found in Appendix 6 section 3H. The requests to extend the blue badge exemptions made by these groups has been carefully considered in the equalities impact assessments found in Appendix 4. 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.
- 5.32. The Commonplace engagement feedback, correspondence, trial feedback surveys, objections received, engagement with disabled groups and responses to the formal consultation, together with any monitoring data that has been collected will feed into the council's decision on the future of the St Peter's LTN scheme.

6. Proposals

- 6.1. The measures that will deliver the necessary changes within the St Peter's LTN area to allow exemptions for Blue Badge holders, shown in the map in Appendix 1 and designs in Appendix 2, are set out in this section.
- 6.2. New signposting with an 'exemption' plate at traffic filters (where required) which uses the phrase 'Except permit holders STP', where 'STP' is a particular reference number to a local permit for the St Peter's LTN issued to eligible vehicles. The new signposting will be installed at the relevant traffic filters: Colebrooke Row, St Peter's Street, Prebend Street, Coleman Fields.
- 6.3. No changes are proposed at the Danbury Street filters.
- 6.4. The changes will require the installation of the following signage:
- Diagram 619 motor vehicles prohibited sign and plate - New 'Except Permit Holders STP'
 - 'Except Cycles and authorised vehicles' sub plate underneath diag. 612 (No turn signs)
 - Diagram 878 camera sign
- 6.5. These measures will also require the following civil works at Colebrooke Row and St Peter's Street filters:
- Removal of width restriction
 - New road markings
 - Additional planters

- New posts

6.6. At Prebend Street and Coleman Fields, planters will be re-aligned to allow 5m gaps for bi-directional vehicular movement.

6.7. It is also proposed to revoke the ETO 2021/085 for the Loading Bay at Basire Street and replace it with a new ETO which will come into force on 3 January 2022. The bay is located to the south-west side, from a point 13.5 metres north-west of a point in line with the party wall of Nos. 5 and 7 Basire Street to a point in line with that party wall.

6.8. A Road Safety Audit (RSA) was completed on 20 December 2021 by Project Centre to assess the proposals for St Peter's LTN. Three issues were highlighted with the proposals.

6.9. First issue: Opening up the central restriction at width restrictions to some traffic may increase the risk of collisions due to confusing carriageway markings. Detail: It is proposed that drivers of permitted motorised vehicles will be allowed to pass through the middle of the width restrictions at the above listed sites, provided they have a permit. The central gap is not wide enough for two vehicles to pass each other in opposite directions. Signs and carriageway markings have not been provided to highlight priority at the width restrictions. This may lead to driver confusion over priority at the restriction leading to sudden braking and shunt collisions. Recommendation: Provide suitable lines and signs to establish priority of direction.

- Officer's response: The removal of existing hatch line markings is to be included in the filter amendments. We are extending the existing 3m gap to 5m to provide sufficient space for vehicles to travel through the filters safely. The Manual for Streets 1 – Figure 7.1 identifies 4.8m being sufficient width for two-way vehicles (including a car and van/minibus travelling in opposite directions at the same time). The council does not expect larger vehicles than a van/minibus to be using these filters (referencing vehicle sizes included in Manual for Streets 1 – Figure 6.18). Despite 4.8m being deemed sufficient in the Manual for Streets for the above vehicles to travel past each other in the opposite direction at the same time, we are extending this further to 5m to provide extra width at the filters. No signage will overhang into this carriageway space. With exemptions only being provided to local resident blue badge holders, for their own Low Traffic Neighbourhoods, we expect the overall volumes and frequency of permitted vehicles to be low at these filters. Vehicle Tracking has been completed and shows this as being sufficient. Placing advanced priority give-way signage immediately in the vicinity of a motor-vehicle prohibition is likely to cause confusion amongst non-permitted drivers. We are unable to provide sub-plates for the priority give-way signs as they are not permitted variants, which means non-permitted drivers will follow the instruction on the priority give-way signage, only to find they are not permitted to go through the filters.

6.10. Second issue: Restricted space at junction could result in vehicles striking on carriageway street furniture at Coleman Fields and Colebrooke Row. Recommendation: Ensure there is sufficient space for authorised vehicles to turn safely at the junction between the planters.

- Officer's response: allowing a 5m gap between the street furniture will allow enough space for vehicles to make turns. Vehicle tracks have been carried out but were not submitted as part of the audit.

6.11. Third issue and recommendations: planters might not be visible at night which could cause collisions. Ensure features are provided on the planters to increase their conspicuity during hours of darkness.

- Officer's response: the specification of the planters were not submitted as part of the RSA. However, all planters will have reflective lighting fitted onto each corner this lighting will allow for the planters to be more visible during the night hours.

School Street exemptions

6.12. Some residents, including Blue Badge holders, who live within the St Peter's LTN and live on a designated School Street (which includes Duncan Street and Noel Road) are eligible for exemptions during the Schools Street restriction times to allow them access to their properties.

6.13. Exemptions for Blue Badge holders will be separate from School Street exemptions and will not permit exempt Blue Badge holders from the School Street restrictions in the St Peter's LTN unless they live on a School Street. A Blue Badge holder who lives on a School Street will be eligible for both the School Street exemption for the street they live on only, in addition to the Blue Badge exemption for designated camera enforced filters in the St Peter's LTN.

6.14. The School Street and Blue Badge exemptions will be signed using separate sign plates with the relevant permit codes.

7. New Traffic Order

7.1. The general effect of the Orders will be to replace the existing experimental scheme and introduce a new experimental scheme that will continue the operation of the St Peter's LTN, with the changes outlined in this report. By replacing the existing scheme, the new Blue Badge holder exemptions will be put in place with no other changes to the operation of the existing scheme, under a new ETO.

The changes will:

- Allow Blue Badge holders to register a single motor vehicle for their personal use which is registered to their own address within (or on the boundary of) the low traffic neighbourhood in which they live. A permit will be provided for this vehicle, which will allow the Blue Badge holder to drive, or be driven, through designated camera-enforced filters of the LTN in which they reside.
- The designated camera-enforced filters include Prebend Street, Coleman Fields, St Peter's Street and Colebrooke Row.
- Danbury Street is not included in the exemptions due to its layout and proximity to Colebrooke Row which provides an alternative access for exempt residents to connect the south-west of St Peter's to the rest of the LTN.

7.2. Council vehicles are not exempt from low traffic neighbourhood measures and will not be exempt to the proposed change outlined in this report. However, to ensure a small number of services can operate safely for residents, clients and staff, a limited number of council vehicles are exempt: community transport (ACT) passenger vehicles and large vehicles for example refuse, recycling and street cleaning vehicles. When not on operational business, these vehicles will use main roads as far as practically possible and not make short-cuts across a residential area. There are no other exemptions for council vehicles.

Engagement with statutory consultees on new Traffic Order

7.3. Statutory pre-implementation consultation on the proposals 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). Each stakeholder was contacted on 13 December 2021, provided with designs for the proposed changes, and asked for their feedback. The council will continue to monitor and review the scheme with the Emergency Services after implementation and make any changes required.

7.4. Feedback from the statutory consultees is summarised here:

- LAS have a preference for the camera enforced closures, took note of the filter at Danbury Street which will remain as a fixed bollard and monitor if services encounter any issues in relation to that closure.
- The MPS state that they "have no concerns with nor objections to this proposal".
- No response received from the LFB.

8. Section 122, Road Traffic Regulation Act 1984

8.1. In the exercise of its powers under the Road Traffic Regulation Act 1984, the council is required, under s.122 of the 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:

- The desirability of securing and maintaining reasonable access to premises;
- 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;
- The impact on air quality both locally and in the surrounding areas;
- 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
- Any other matters appearing to the council to be relevant.

8.2. In balancing the considerations above, officers consider that the implementation of the changes to the St Peter's LTN should proceed on the following factors:

- 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.
- 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.
- 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.
- 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 services vehicles ability to respond to an emergency without restriction or delay.

9. Implications

9.1. Financial implications:

Costs

The estimated scheme build costs for the changes to enable the Blue Badge exemptions are £35k which includes the costs of signage, and civil works, cost of the traffic orders and the road safety audits, and communications to support the change.

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

There is no loss of revenue anticipated with the introduction of the St Peter's LTN change.

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.

The camera-enforced closures used in the St Peter's LTN are anticipated to generate some enforcement income within the parking account.

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 contribute to the overall parking revenue targets.

9.2. Legal Implications

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.

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 ...”

“Traffic” includes pedestrians.

The Road Traffic Regulation Act 1984 (the “1984 Act”) Section 9 enables the council to make an experimental traffic order (“ETO”). An experimental traffic order may not last longer than 18 months. S10 of the 1984 Act gives a power to modify or suspend the ETO in certain circumstances.

In deciding whether to make an order under section 9 or modify / suspend under section 10 the council has to comply with the provisions of section 122 of the 1984 Act which requires the council to exercise that function (so 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:

- (a) the desirability of securing and maintaining reasonable access to premises;
- (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;
- (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
- (d) any other matters appearing to the local authority to be relevant.

The procedures to be followed before making a traffic regulation order are set out in the Local Authorities Traffic Orders (Procedure) (England and Wales) Regulations 1996 (“the 1996 Regulations”).

The 1996 Regulations Part IV 22 (2) provides that a local authority must give a minimum of seven days’ notice of any provision of an experimental traffic order coming into force, beginning with the day on which a notice of making in relation to the order is published.

The 1996 Regulations Part II 6 provides that a local authority must, before making an order, consult any of the following who may be affected by the order: neighbouring local authorities, bus operators, Transport for London, the NHS trust/ambulance operator, and the London Fire Brigade. Moreover, in all cases, the local authority must consult the Freight Transport Association, the Road Haulage Association, and such other organisations (if any) representing persons likely to be affected by any provision in the order as the order making authority thinks it appropriate to consult.

Once an ETO is in place, any person may object to the making of the permanent Orders within a period of six months beginning with the day on which the experimental Orders come into force or, if the Orders are 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.

In due course, in deciding whether or not to make the ETOs permanent, the council will need to consider any objections received during the 6 month period, feedback from the trial feedback survey, representations received from the public consultation and its own monitoring data.

The Highways Act 1980 and the Highways (Traffic Calming) Regulations 1999 (as amended) gives the council power to install and construct any works on the public highways for which it is the highways authority. The construction of build-outs is specifically authorised by the 1999 Regulations. All signage related to the scheme should be compliant with Traffic Signs Regulations and General Directions 2016.

The proposals for people-friendly streets outlined in this report should have regard to the Department for Transport's (DfT) statutory guidance 'Traffic Management Act 2004: Network Management to support recovery from COVID19' updated on 30 July 2021.

In addition 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). That strategy emphasises the importance of reducing emissions and improving air quality. Regard should also be had to the Islington Transport Strategy (adopted in November 2020).

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.

This is dealt with in the Equalities Impact Assessment (Appendix 4) and this assessment is summarised below in section 9.4.

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.

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.

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.

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.

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.

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

Delivering Low Traffic Neighbourhoods (LTNs), and in this case continuing the LTN across the borough 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 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.

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.

The proposals are aimed at enhancing the St Peter's LTN, the objective of which is to encourage increased walking and cycling. 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.

Recent research has shown higher death rates from COVID-19 in areas where there is poorer air quality than in areas with better air quality. By encouraging walking and cycling through the measures outlined above, the council will be supporting the health resilience of those working and living in Islington.

The proposed changes to the St Peter's LTN will have some direct environmental impacts. These include resource usage for new signage, bollards and road marking, energy use and waste generation during their installation, together with possible nuisance impacts such as noise or dust, as well as impacts related to contractor journeys to site during the works. However, additional planters will also be installed, adding more greenery to the public realm.

The impact on local emissions depends on whether the proposals lead to an increase in the number of trips by exempted residents. If it does, this is likely to increase carbon and NOx emissions. However, if trips taken by exempted residents are unavoidable and would have been taken with or without the exemptions in place, the exemptions may reduce the distances travelled and therefore reduce emissions.

9.4. Equalities Impact Assessment

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.

An Equalities Impact Assessment (EqIA) was completed for the amendments to the LTN featured in this report. The full EqIA is attached in Appendix 4 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

By implementing the proposed changes and restricting through traffic, 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 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.

People who are Blue Badge holders who live within the St Peter's LTN and have access to a vehicle registered to their home address will benefit from the proposed exemptions at designated camera-enforced filters in the LTN 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.

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 policy. The positive impacts of LTNs on local traffic levels, as evidenced by interim monitoring reports, means less congestion for exempt vehicles.

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

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.

Following the implementation of the changes to the St Peter's LTN scheme, the whole area will still be 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.

Whilst the purpose of LTN measures is to create a safer environment 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.

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 LTN as they currently exist.

The St Peter's interim and pre-consultation monitoring reports outlined some displacement to main roads observed, and will be considered alongside changes in air quality as a result of initiatives such as ULEZ and the recent extension in October 2021 (which now covers the whole of Islington) and the Council's Electric Vehicle Charging programme.

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.

10. Conclusion and reasons for recommendations

- 10.1. **Recommendation.** The Corporate Director of Environment is asked to agree the proposals set out in this report, including the installation of signage, and revocation of Traffic Management Orders and issuing of Experimental Traffic Orders. This report also sets out the council's proposals to make changes in the St Peter's LTN, to allow for Blue Badge exemptions to be implemented at all designated traffic filters.

10.2. In making this decision the Corporate Director of Environment needs to assess if the trial so far has largely achieved the objectives of the LTN and balance those benefits with the potential disbenefits that could be caused by the scheme. To assess this the monitoring data needs to be brought into conversation with the consultation responses and objections received for the scheme.

10.3. **Assessment of benefits.** The St Peter’s LTN aimed to encourage local people to walk and cycle in their neighbourhoods. 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 with impaired mobility and other vulnerable groups. These aims are supportive of the council’s net zero carbon and Fairer Islington priorities.

10.4. Table 1 highlights where there is clear evidence from the monitoring data and consultation results that the trial is meeting achieved the objectives.

Policy	Scheme Objective	Evidence from pre-consultation monitoring data	Feedback from Consultation
<p>Islington Transport Strategy</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>Vision 2030: Creating a Net Zero Carbon Islington by 2030</p> <p>Priority 3: Reduce emissions in the borough from transport. We will reduce vehicular</p>	<p>Reduce motorised traffic and vehicle emissions across internal roads, aimed to improve air quality.</p>	<p>Overall, motorised traffic volumes on internal roads have decreased by an average of 56%. The greatest decrease has been on Prebend Street where there was an 84% decrease.</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>In the St Peter’s trial feedback survey, in answer to the question “What do you like about the trial?” the most common answers were: Reduction of through traffic (31%) and Reduction of air pollution (24%)</p> <p>In the consultation: 47% of respondents have felt like there is less noise from traffic since the introduction of the St Peter’s LTN trial. 20% disagreed with that statement.</p> <p>49% of respondents said the air was cleaner. X% disagreed with that statement</p>

Policy	Scheme Objective	Evidence from pre-consultation monitoring data	Feedback from Consultation
emissions by encouraging walking, cycling and public transportation.			
<p>Islington Transport Strategy</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>	Reduce motorised traffic overall across internal and boundary roads.	<p>Across the boundary roads, total volumes of motorised traffic show a negligible change (1% fall).</p> <p>On average, motorised traffic volumes have changed on:</p> <ul style="list-style-type: none"> • Essex Road by +2% • New North Road by +24% • City Road by -14% 	<p>In the consultation: The two highest codes which came out of the open question analysis in the survey were 'Concern that the LTN increases vehicle traffic on unsuitable nearby roads/ boundary roads' and 'Concern that the LTN reduces air quality / does not improve air quality'. Those concerns were monitored through data collection in November 2020 and June 2021 and are discussed in Section 10 of this report.</p>
<p>Islington Transport Strategy</p> <p>Objective One: Healthy. To encourage and enable residents to walk and cycle as a first choice for local travel.</p> <p>Vision 2030: Creating a Net Zero Carbon Islington by 2030</p> <p>Priority 3: Reduce emissions in the borough from transport. We will reduce vehicular</p>	Increase levels of walking and cycling across internal roads.	<p>Cycling has increased by 72% on the internal roads.</p> <p>The greatest increase has been on Wharf Road, which has seen a 193% increase in cycling.</p>	<p>In the consultation: 40% of respondents stated that they are walking and cycling more to local shops and businesses. 13% disagreed with that statement.</p> <p>50% of respondents felt that it was easier to cross the street since the introduction of the St Peter's LTN scheme. 19% disagreed with that statement.</p> <p>30% of respondents say they are more likely for them to walk or cycle for short trips instead of</p>

Policy	Scheme Objective	Evidence from pre-consultation monitoring data	Feedback from Consultation
<p>emissions by encouraging walking, cycling and public transportation.</p>			<p>driving. 12% are less likely.</p> <p>45% of respondents said it is easier to get in and out of the St Peters area by walking and cycling. 18% said it is less easy.</p> <p>46% of respondents said it is easier for me to make the trips I need to make by walking and cycling. 19% said it is less easy.</p>
<p>Islington Transport Strategy</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>	<p>Reduce road danger and the levels of speeding on internal roads</p>	<p>Across internal roads, average speeds have decreased by 9%.</p> <p>The number of vehicles speeding has decreased by 78%.</p>	<p>In the trial feedback survey: 20% said they like the trial because it makes it safer and easier to cross the road. 11% said they like the trial because it reduces speeding.</p> <p>In the consultation: 44% of respondents felt there was less speeding from Traffic. 18% disagree with that statement</p> <p>37% of respondents felt more safe using the street at night. 34% felt less safe using the street at night.</p> <p>46% of respondents felt more safe using the street during the day. 25% felt</p>

Policy	Scheme Objective	Evidence from pre-consultation monitoring data	Feedback from Consultation
			less safe using the street during the day.

Table 1: Assessment of benefits

10.5. **Assessment of dis-benefits.** The council always committed to duly consider all feedback and objections received on the schemes and also monitor potential negative impacts of the scheme. In table 2 the main criticisms of the scheme emerging from consultation, engagement and objections are put into context alongside the monitoring data gathered during the trial, and the objectives of the scheme.

Consultation themes or potential negative impact	Monitoring report and summary of findings	Commentary
Increase of traffic on main / boundary roads	<p>Across the boundary roads, total volumes of motorised traffic show a negligible change (1% fall).</p> <p>On average, motorised traffic volumes have changed on:</p> <ul style="list-style-type: none"> • Essex Road by +2% • New North Road by +24% • City Road by -14% 	<p>An increase in boundary road traffic was the most common negative feedback about the scheme in the trial feedback survey and in the consultation questionnaire. The pre-consultation monitoring data suggests that overall, when considering all boundary roads, there was a negligible change (a reduction of 1%) in traffic volumes across all boundary roads. The overall figures consider traffic throughout the day, and where there is variation in traffic volumes at different times this might explain perceptions of traffic increase on boundary roads, as travel directions and peak times can vary greatly and impact journeys differently.</p> <p>With regards to New North Road, the 24% increase in traffic volumes remains a concern. It is worth noting that after six months of monitoring, the increase on New North Road was measured at 32%, so the volumes have decreased in the second six months of monitoring. The Canonbury East pre-consultation monitoring report showed an increase of 11% on New North Road, showing that the changes do fluctuate over time, and that the trend may be for volumes to be reducing on this road.</p>

Consultation themes or potential negative impact	Monitoring report and summary of findings	Commentary
		<p>The increase on New North Road could be caused to a certain extent by factors other than the St Peter's PFS trial. For example, during the data collection period for the baseline counts, works to remove the Old Street roundabout were having a significant impact on traffic flows on New North Road, which leads to the gyratory. It is not possible to separate out or control for the impact of these works on the boundary roads from the impact of the low traffic neighbourhood. The council is working with TfL to develop mitigating measures and will continue to monitor the site.</p> <p>In addition, New North Road borders three low traffic neighbourhood trials (St Peter's and Canonbury East in Islington, and Hoxton West in Hackney) which were implemented within months of each other, and this may have exacerbated the early traffic displacement visible in the St Peter's trial interim monitoring. In the longer term, travel behaviour is expected to adjust, resulting in lower motorised traffic levels overall, though essential trips will continue. The council will continue to monitor traffic on New North Road and is proposing to implement mitigating schemes on this road including additional greening and planting.</p>
Inconvenience to car drivers / longer journeys	Journey time analysis carried out	<p>Journey time analysis that was carried out shows that the longer the journey, the smaller the proportional increase in time or distance for the whole journey. This means that the greatest inconvenience is caused to people choosing to make the shortest trips. As one of the aims of the PFS programme is to encourage and enable people to switch short local trips from driving to active means, some measure of inconvenience for short motor trips can be seen as a necessary part of the scheme to allow that modal shift to happen, and reduce the overall number of car trips. Objective One of the Islington Transport Strategy is "To encourage and enable residents to walk and cycle as a first choice for local travel", and walking and cycling can be made a more attractive choice by making them as easy (or easier) than driving for short trips, and by reducing the threat of road danger.</p>

Consultation themes or potential negative impact	Monitoring report and summary of findings	Commentary
		<p>In the St Peter’s consultation, 27% of respondents from car-owning households said they were now driving less for shorter or local journeys, the same percentage who said they were walking or cycling instead for these journeys. Overall, 40% of respondents say they walk or cycle to local shops and businesses. Where this inconvenience impacts on disabled people, the council has made changes to the scheme and this is addressed later in this section.</p>
Reduction of air quality	Inconclusive.	<p>On air quality, the council received feedback from residents that they felt it had been both improved and reduced. Neither conclusion can be confirmed based on the monitoring data gathered so far. NO₂ levels in St Peter’s have been below the annual objective level of 40µg/m³ at all monitoring sites post-implementation (July 2020-June 2021), including on boundary roads. Levels of NO₂ in and around St Peter’s have negligibly changed at all sites where data is available for 2019. This reflects borough-wide trends, suggesting the PFS trial has not had an adverse impact on air quality. One of the objectives of the scheme was to reduce vehicle emissions across internal roads, and where data exists for internal roads (for NO₂ levels) this shows a decrease in transport related emissions.</p>
Emergency services response times	No significant impact.	<p>Given the extent of variables that affect response times, the differences between the 2019 baseline, the 2020 pre-implementation period and the postimplementation period are within target times set out by the LFB and the council. As such, it is the view of the LFB and the council that the PFS area in St Peter’s has not impacted this emergency service’s attendance times. The council will continue to monitor this indicator.</p> <p>There have also been no reported delays to the London Ambulance Service or the Metropolitan Police Service, each of whom provided a statement for the St Peter’s pre-consultation monitoring report.</p>

Consultation themes or potential negative impact	Monitoring report and summary of findings	Commentary
Increase in crime or anti-social behaviour	No significant impact.	<p>The potential negative impacts identified in feedback were: an increase in danger from motor traffic and an increase in crime or anti-social behaviour within the LTN. There is no evidence of increased danger from motor traffic. The number of vehicles speeding on internal roads within the LTN has fallen by 78%. This is proportionately more than the drop in traffic volumes, which suggests that the lower number of drivers who still use roads within the LTN are doing so more slowly. Average speeds have dropped by 9% (the whole of St Peter's is within a 20mph zone). The World Health Organisation states that: "Excess and inappropriate speed are responsible for a high proportion of the mortality and morbidity that result from road crashes. In high-income countries, speed contributes to about 30% of deaths on the road ... Controlling vehicle speed can prevent crashes happening and can reduce the impact when they do occur, lessening the severity of injuries sustained by the victims."</p> <p>Furthermore, a study which samples LTNs across London, carried out by Rachel Aldred at the University of Westminster, has found statistically significant evidence that LTNs have decreased casualties. The London-wide study of LTNs in the October to December period of 2020 found absolute numbers of injuries inside LTNs halved relative to the rest of London (ratio 0.51, $p < 0.001$), with substantial reductions in pedestrian injury risk. The study also found no evidence of changes in injury numbers or risk on LTN boundary roads.</p> <p>On crime, analysis shows anti-social behaviour and crime patterns in the area are in line with patterns across the borough overall, suggesting the PFS trial in St Peter's has not had an impact on anti-social behaviour and crime patterns. Crime is very much dependent on the local area. The reduction of motor traffic volumes in the St Peter's LTN area (down by 56%) has happened alongside an increase in people cycling (up by 72%). People driving in vehicles would be moving faster through the area and would be less observant of people walking, so could be less likely to stop. Walking levels were not monitored, but</p>

Consultation themes or potential negative impact	Monitoring report and summary of findings	Commentary
		<p>if these have followed cycling levels then there would be an increased presence of people on the streets, increasing passive surveillance. The council has not been able to find evidence that a higher presence of motor vehicles in an area reduces crime rates (discounting the crimes which can be attributed to the drivers themselves, such as speeding and dangerous driving). A study by Anna Goodman and Rachel Aldred (2021) examined the relationship between LTNs and street crime over a 7-year period after the implementation of LTNs in Waltham Forest, based on police data. The report found that the introduction of an LTN was associated with a 10% decrease in street crime. and this effect increased with a longer duration since implementation (18% decrease after 3 years). An even larger reduction was observed for violence and sexual offences, the most serious subcategory of crime. The only subcategory of crime that increased significantly was bicycle theft, plausibly largely reflecting increased cycling levels. There was no indication of displacement of any crime subcategory into adjacent areas.</p> <p>The St Peter’s consultation asked a specific set of questions on how subjective safety (how safe people feel when using the streets) has changed since the implementation of the LTN. 37% of respondents said they felt more safe using the street at night (compared to 34% who felt less safe, and 25% who noticed no change). 46% felt more safe using the street in the day (compared to 25% who felt less safe, and 27% who noticed no change). These results suggest that a majority of local people feel that the implementation of the LTN has resulted in streets that are as safe or safer than they were prior to the LTN: 62% during the night, and 73% during the day.</p> <p>Nonetheless, while statistics shows that the implementation of the St Peter’s LTN has not increased crime rates, individual feelings of safety and security when travelling through Islington are very subjective, and personal to each person’s experiences and situation – the</p>

Consultation themes or potential negative impact	Monitoring report and summary of findings	Commentary
		<p>council recognises that women in particular might experience feelings of insecurity. The council has taken note of these comments and is investigating actions it can take to improve 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 make Islington's streets safer.</p>
<p>Concerns over dangerous / fast cycling</p>	<p>Monitoring data shows that cycling levels have increased by 72% during the first year of the scheme's operation.</p>	<p>An increase of 72% in cycling volumes is significant and would be noticeable to anyone using the streets in the area. All road users, including people cycling, should obey the Highway Code. Islington Council offers free cycle skills training for adults and children to enable people to cycle more confidently and safely on the road. (More details can be seen here). The council has also previously run targeted 'stop and advise' sessions alongside local police officers, at locations where cycling contraventions have been reported.</p> <p>Many surveys show that the main barrier preventing people from cycling on the roads is the perception that sharing the road with motor vehicles is too dangerous, so by reducing motor vehicle traffic on local streets more people should be encouraged to cycle on the roads and away from areas used by people walking.</p>
<p>Lack of early consultation</p>	<p>Not able to be monitored.</p>	<p>One common objection to the St Peter's LTN was a "lack of early consultation". Government guidance from May 2020 stated that "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." The provisions of the 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 implementing low traffic neighbourhoods. More details on the legal status of implementing the LTNs can be found in</p>

Consultation themes or potential negative impact	Monitoring report and summary of findings	Commentary
		<p>Section 8 on the Road Traffic Regulation Act 1984, and Section 9.2 on Legal implications.</p> <p>Although there was no consultation prior to implementing the St Peter's LTN as a trial, the council stated from the outset that the trial would be assessed by both monitoring and a full public consultation before the end of the 18-month period for the initial ETO. This consultation has now taken place and is discussed at length in this report, and in separate reports provided as appendices.</p>
Impact on disabled people	Mitigation proposed through Blue Badge exemption and people-friendly pavements.	<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 described in Section 6 of this report, the council is introducing a new exemption policy for Blue Badge holders which may help to mitigate against longer journey times or distances for eligible residents. This policy will apply in the St Peter's LTN after the introduction of the new ETO which this report recommends, and more details will be provided to Blue Badge holders in the St Peter's LTN once the traffic order comes into force.</p> <p>It is important to note that people may have a range of disabilities, some of which affect mobility, some of which are affected by other people's mobility choices. Not all disabled people experience the same barriers to active travel or the same transport needs. The TfL report 'Understanding our diverse communities', from 2019, shows that walking (which includes travelling with a mobility aid and wheelchair), is the mode of transport disabled people use the most (81% walk at least once a week). Transport for All, a disabled-led group who campaign for access to transport and Streetspace across the UK produced a report on LTNs called 'Pave the Way'. This balanced report shows that LTNs are supported by some disabled people, and that LTNs can bring benefits to disabled people including "easier or more pleasant journeys; an increase in independence; a decrease in</p>

Consultation themes or potential negative impact	Monitoring report and summary of findings	Commentary
		traffic danger and benefits to physical and mental health” (p.6 of report).

Table 2: Assessment of disbenefits

- 10.6. **Reason for recommendation.** In summary, table 1 shows the ways in which the St Peter’s LTN scheme 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. Table 2 shows an assessment of the most common negative themes and objections to the scheme. In most cases, these objections are not supported by evidence or have been mitigated by these proposals. Where evidence does support the negative themes, for example, on the impact of the St Peter’s LTN on the mobility of some disabled people, the council is proposing significant changes to the traffic orders and operation of the LTN to mitigate these impacts. The council will also carry out further investigation on the perception of crime and safety within the LTN, as detailed in table 2.
- 10.7. In conclusion, the Corporate Director of Environment is asked to agree to the two recommendations set out in this report: to continue the St Peter’s LTN trial, and to introduce a new ETO in order to allow the exemption policy for Blue Badge holders to become operational.
- 10.8. The continuation of the scheme is recommended because there is clear evidence that the scheme is meeting many of its overall objectives as supported by monitoring and consultation results, and that potential negative impacts emerging from the consultation results are either not supported by monitoring data, are unrelated to the LTN, or have been mitigated through adjustments to the scheme.
- 10.9. The implementation of the Blue Badge exemption policy in the St Peter’s LTN, including the installation of signage, and lapse of existing Traffic Management Orders and issuing of Experimental Traffic Orders, is a mitigation to the scheme after a close consideration of monitoring, research and feedback, which will provide a benefit to some members of groups with protected characteristics.
- 10.10. This report outlines the proposal, engagement and monitoring approach and recommendation to proceed with the implementation of the changes to allow Blue Badge exemptions. In order to allow these exemptions to be implemented, the current ETO would be allowed to expire and would be replaced with a new ETO, proposed to be made on 23 December 2021 and to come into force on 3 January 2022. The new ETO

will be a material change to the ETO which came into force on 25 June 2021. Whilst it maintains the same traffic filter locations, by adding a Blue Badge exemption to all traffic filters, it changes the operation of the LTN by allowing some residents to drive through filters legally, for the first time. The exemption will also require physical changes to three of the four filters in the area. Therefore, the council intends to trial the change as a new experiment. This will open a new six-month objection period to this ETO, which will close on 3 July 2022.

- 10.11. The council's intention is for this new ETO to be in place for at least seven months, which allows time to consider any objections which are received by 3 July 2022. After this point, the council will then take a final decision on whether or not to make this new ETO (which contains the Blue Badge exemptions) permanent.

A handwritten signature in blue ink that reads "K. Townsend." The signature is written in a cursive style and is centered within a light blue rectangular background.

Signed by:

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Date: 22 December 2021

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Appendix 1 – Location map of proposed changes

Appendix 2 – Designs for changes to filters at Colebrooke Row, St Peter's Street, Prebend Street and Coleman Fields

Appendix 3 – Leaflet sent to residents

Appendix 4 – Equalities Impact Assessment

Appendix 5 – Pre-consultation and engagement report

Appendix 6 – Independent consultation report

Appendix 7 – Responses to objections

Appendix 8 – Interim monitoring report

Appendix 9 – Pre-consultation monitoring report