

Climate Change and Transport
1 Cottage Road, N7

Delegated Decision report of: Director of Climate Change and Transport

Date: 30 June 2023

Ward(s): St. Mary's and St. James', Laycock

Making St Mary's Church Low Traffic Neighbourhood permanent

1. Synopsis

- 1.1. The St Mary's Church Low Traffic Neighbourhood (LTN) was implemented under an Experimental Traffic Order (ETO) that came into force on 14 January 2022. This LTN is part of the council's people-friendly streets (PFS) programme, developed in response to the Covid-19 pandemic, in line with the Islington Transport Strategy (2020-2041) and Vision 2030: Building a Net Zero Carbon Islington by 2030 Strategy. St Mary's Church was the first LTN to be implemented following a decision by the council's Executive on 14 October 2021 to introduce an exemption policy for Blue Badge holders, and so this policy formed part of the St Mary's Church LTN trial from the outset.
- 1.2. Four camera enforced traffic filters were introduced in the St Mary's Church area as part of the measures, with the trial scheme going live in February 2022.
- 1.3. The impacts of the trial scheme were monitored with the results set out in a report published in March 2023, which is summarised in Section 5 of this report. A public consultation ran from 29 March to 26 April 2023 and comprised distribution of leaflets in the area, an online survey, an online town hall Q&A event, business visits and door knocking to boost survey participation. Statutory consultees have also been consulted on the ETO proposal and notified of the intention to make the trial scheme permanent. A summary of the consultation can be found at Section 7 of this report and a full consultation report is provided at Appendix 5.
- 1.4. This report sets out the decision and reasons to make the St Mary's Church LTN traffic order permanent following detailed monitoring and consultation, demonstrating that

the trial scheme is largely meeting its objectives. The specific decision is detailed at Section 2.

- 1.5. On 12 January 2023, the council's Executive decided to continue its commitment to the PFS programme and introduce liveable neighbourhoods and the people-friendly pavements (PFP) programme across the borough.
- 1.6. To enhance the LTN and make it a liveable neighbourhood, as well as in response to feedback received during the consultation, the council will continue to deliver more public realm improvements such as improvements to pavements as part of the PFP programme and greening in collaboration with residents. More details on the future of the LTN can be found in Section 8 of this report.

2. Decision

- 2.1. To note that the council's Executive, at its meeting on 18 June 2020, delegated authority to the Corporate Director of Environment and Regeneration, in consultation with the Executive Member for Environment and Transport, to finalise and implement the PFS schemes, taking into account the consultation responses.
- 2.2. 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 PFS 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 the Executive.
- 2.3. To note that the 12 January 2023 Executive Report changed the delegation of authority to the Director of Climate Change and Transport, in consultation with the Corporate Director of Environment and the Executive Member for Environment, Air Quality and Transport, set out in paragraph 2.8 of the report to the Executive.
- 2.4. To agree to make the St Mary's Church LTN, as implemented by an ETO, permanent with no changes:
 - Four camera enforced traffic filters with exemptions for SMC permit holders at: Halton Road north of the junction with Braes Street; Braes Street at the junction with Canonbury Road; Hawes Street just west of the junction with Shillingford Street; and at Cross Street just west of the junction with Shillingford Street

- 2.5. To note that the ETO for the St Mary's Church LTN came into force on 14 January 2022 and is due to expire on 13 July 2023 and will be replaced by a permanent traffic management order (TMO).
- 2.6. To note the results of the pre-consultation monitoring report that highlights that the scheme is generally meeting its objectives, as detailed in section 5 of this report. The pre-consultation monitoring report is provided at Appendix 7.
- 2.7. To note that the council acknowledges significant increases in traffic volumes on Canonbury Lane and Canonbury Square that remain open as an east-west through route within the LTN. These locations will continue to be monitored. Future potential measures to reduce cut through traffic 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 via Canonbury Lane and Canonbury Square. Moreover, data demonstrates that traffic volumes on Canonbury Lane remain lower than pre-pandemic levels when considering the combined impact of the Canonbury West and St Mary's Church LTNs, despite the increase between before and after the implementation of the St Mary's Church LTN.
- 2.8. To note the feedback received from pre-scheme public engagement, the public consultation and business engagement. More details on the pre-scheme public engagement and consultation can be found in the pre-consultation engagement report and independently produced consultation report for St Mary's Church provided at Appendices 4 and 5.
- 2.9. To note the recommendation (paragraph 6.25) that the council should continue to engage and work directly with businesses within the LTN and on measures to support them where possible.

3. Date the decision is to be taken

- 3.1. The decision date is 30 June 2023.

4. Background

- 4.1. The council's Transport Strategy and Vision 2030 Strategy were consulted on and adopted by the council's Executive in November 2020. They make the case for the introduction of measures aimed at enabling a reduction in motor traffic, enabling more people to walk, cycle and wheel and lead active lifestyles, reducing road danger and the impact of transport on local air pollution and climate change.
- 4.2. Proposals for the PFS programme were agreed by the council's Executive on 18 June 2020 with renewed commitments and updates made to the programme by

the Executive in October 2021 and January 2023. On 22 December 2021, 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 Mary's Church LTN. The ETO was advertised on 7 January 2022 and came into force on 14 January 2022.

- 4.3. The Executive paper approved in October 2021 set out changes to the PFS programme including in relation to the subsequent implementation of the St Mary's Church LTN. These included exemptions for Blue Badge holders to traffic filters within their home LTN (to apply from the outset in the case of St Mary's Church); additional engagement with businesses prior to the implementation of the St Mary's Church LTN; contributing to 'greening' of the borough making greater use of planters, build outs and greening as part of LTNs, and incorporating 'people-friendly pavements' into LTNs with improvements to make pavements more accessible. These were all taken into account in the design and delivery of the St Mary's Church LTN.

5. Monitoring

- 5.1. 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 LTNs on safety and security, as well as environmental factors such as air quality have also been measured. The results of the monitoring are considered here as part of the decision-making process on the St Mary's Church LTN measures.
- 5.2. The St Mary's Church pre-consultation monitoring report, independently produced by Systra, is provided at Appendix 7 of this report and is available on the council's website at [St Marys Church | Islington Council](#).

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

- 5.3. As part of the monitoring strategy, baseline data was collected before implementation of the LTN in November 2021 and the traffic survey was repeated in January 2023 to produce the 'pre-consultation monitoring report'. The data collection includes traffic counts and air quality monitoring within the LTN and on surrounding roads.
- 5.4. The report shows that the trial scheme is generally having the intended impacts in the area of:
- Reducing motorised traffic across internal roads (-41%)
 - Reducing motorised traffic on boundary roads (-12%)
 - Reducing the volume of vehicles speeding on internal roads (-8%)

- Overall changes in levels of nitrogen dioxide (NO₂) in St Mary's Church reflects those recorded in the borough more widely
- London Fire Brigade response times remain within targets, and no significant impact on anti-social behaviour (ASB) and crime rates was recorded.

- 5.5. Although traffic volumes decreased at eight out of the 11 of the internal road sites counted, including a 91% decrease on Braes Street and a 90% decrease on Hawes Street, traffic increased on three internal roads, most notably Canonbury Square (57%) and Canonbury Lane (35%) which still provide a through route between Canonbury Road and Upper Street due to banned movements at Highbury Corner. The council will continue to monitor traffic flows at these locations. Future potential measures in neighbouring areas to the west of Upper Street, if implemented, may reduce the flow of east-west traffic. This may benefit these streets by reducing cut through traffic.
- 5.6. Despite the increases on Canonbury Lane and Canonbury Square, data set out in the monitoring report (Appendix 7, p25) shows that the traffic flows at these locations are still lower than pre-pandemic levels on Canonbury Lane, and by inference Canonbury Square. The increases follow a significant reduction in traffic flows, likely as a result of the implementation of the neighbouring Canonbury West LTN on the eastern side of Canonbury Road which curtailed an east-west route through the wider area.
- 5.7. An internal count site on Halton Road south of the traffic filter on the street saw an increase in traffic volumes of 18%. This increase amounts to 172 daily vehicles and is considered comparatively minor and also equates to one of the smallest changes in magnitude across all internal roads. This increase is likely caused by change in circulation of neighbourhood traffic within the LTN.
- 5.8. Overall, cycling volumes decreased by 8% in the St Mary's Church area between surveys (15% on internal roads and 2% on boundary roads). Cycling volumes decreased on all internal roads except for Cross Street (east), where cycling increased by 21%. This decrease may be attributable to colder weather during the pre-consultation survey period compared to the baseline period and that during the winter months cycling levels are lower due to poor weather conditions and shorter daylight hours.
- 5.9. Bus journey times on Upper Street and Essex Road are higher than pre-pandemic averages, however there is no clear impact of the scheme's implementation affecting these times. Journey times on Canonbury Road are largely at, or below pre-pandemic averages. The council's transport strategy included a commitment to working with Transport for London (TfL) to improve bus reliability and achieve an improvement to bus journey times. The council will therefore work to improve bus journey times on Essex Road which now forms a boundary road between multiple LTNs including St Mary's Church (as well as Canonbury East, Canonbury West and St Peter's) by exploring prioritisation measures such as the removal or relocation of existing parking, additional double yellow lines, bus lane expansion, and bus lane time review. The council will begin the feasibility study for this project in financial year 2023/24. The

council is working with TfL to monitor a recent increase in bus journey times seen on Upper Street in January 2023.

- 5.10. In terms of air quality, there was a moderate increase in concentration of NO² levels between periods assessed, however this was generally on-par or less significant than the wider borough while air quality has been gradually improving over the longer term. NO² levels in the scheme area have largely been within the annual objective levels of 40µg/m. Levels were above this limit at two sites within the scheme area (Canonbury Road and Essex Road), which the council will continue to monitor as part of ongoing air quality monitoring in the borough.
- 5.11. It should be noted that the air quality monitoring report contains provisional data for 2022 which may change as a result of undergoing a number of quality control processes that can only be conducted fully at the end of the year, and the final results for these monitoring sites will be released in the annual air quality report for 2022 later this year. Over the last few years this process has resulted in final values being lower, and while this is no guarantee that the same thing will happen for 2022, indications are that the final results will be slightly lower than the raw data suggests. The annual air quality report for 2022 will be published on the [pollution website](#) where you can also find reports from previous years, as well as more information on the quality control processes used for air quality data.

6. Pre-consultation engagement

Pre-consultation engagement activities

- 6.1. The council has been actively engaging with residents, businesses and other stakeholders to gather feedback on the PFS schemes that have been introduced. The methods used for engagement 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 an ETO has been introduced. This pre-consultation feedback has been analysed and is summarised in a report at Appendix 4.
- 6.2. 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, local organisations and other respondents to suggest how local streets could be improved for people walking or cycling. The tool enabled local people to map their comments at specific locations across the borough.
- 6.3. At the close of the Commonplace engagement on 2 March 2021, 245 comments relating to what would become the St Mary's Church LTN area (including the boundary roads) had been submitted.

- 6.4. The number of pieces of **correspondence** regarding the St Mary's Church LTN over the period of advertisement, implementation and pre-consultation totals 178, from 173 individuals. Key themes of the correspondence can be found in the pre-consultation monitoring report at Appendix 4 (Section 3.25).
- 6.5. The St Mary's Church LTN **trial feedback survey** was open from 8 December 2021 and closed on 29 March 2023, when the public consultation began. 399 people submitted a survey response. The trial feedback survey results have been analysed and reported on in Appendix 4 (Section 3F).
- 6.6. In the St Mary's Church LTN trial feedback survey, in answer to the question "What do you like about the trial?" the most common answers were:
- Reduces through traffic (15%)
 - Reduces air pollution (12%)
 - Makes the area more pleasant (10%)
 - Makes it safer to cross the road (10%)
- 6.7. In answer to "What do you dislike about the trial", the most common answers were:
- Increases traffic on main roads (63%)
 - I wasn't asked for my views before the trial started (37%)
 - Increases air pollution (34%)
- 6.8. 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%.
- 6.9. The objection period for ETOs is six months following the date that the ETO came into force. When deciding whether to make an ETO permanent, the council is required to consider all objections received during this six month period. The objection period enables views to be gathered on whether the ETO should be made permanent.
- 6.10. The objection period on the St Mary's Church ETO expired on 14 July 2022. There were 8 objections received for the St Mary's Church ETO.
- 6.11. The main themes of objections included impact on journey times (longer / more inconvenient journey), lack of consultation prior to implementation of the scheme and disadvantage caused to elderly and/or disabled residents. The themes raised in the objections have been duly considered and responded to in Appendix 6. It is considered that the points raised in these objections are being mitigated or are either not contrary to ETO process, have been considered as part of the equality impact assessment (EqIA) or are known outcomes or objectives of LTNs that are outweighed by the benefits achieved.

Focussed engagement with disability groups and older people

- 6.12. At the start of the PFS programme and in the Resident Impact Assessment (RIA) attached to the original St Mary's Church delegated decision report (the RIA was signed on 21 December 2021) the council committed to engage with disabled groups.

This was to gain a greater understanding of the impacts on disabled people who rely on motor vehicle transport, and who are therefore more likely to be impacted by different travel routes as well as a possible increase in journey time.

- 6.13. Since the announcement of the Blue Badge Exemption policy the council has continued to engage with groups representing disabled people 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 4 section 3H.
- 6.14. The engagement with disabled groups and feedback from disabled individuals directly led to the introduction of the Blue Badge 'Home LTN' exemption policy by the council's Executive, at its meeting on 14 October 2021. St Mary's Church was the first LTN introduced following this decision and so had the Blue Badge policy operational from the outset of the scheme.
- 6.15. The Executive Report also committed to developing a separate exemption route for people who do not meet the criteria for the standard (Home LTN) exemption permit (referred to in the report as an 'exceptional circumstance dispensation'). The resultant 'Individual Exemption' policy was introduced on a trial basis from January 2023 as a reasonable adjustment for people with disabilities or chronic or psychological conditions who are disproportionately affected as a result of travelling within low traffic neighbourhoods, regardless of Blue Badge status. It is intended to enable journeys that would not otherwise be possible or would only be possible with considerable difficulty or overwhelming distress. More details of the individual exemption are available on the council's website at: [Individual Exemption FAQs | Islington Council](#)
- 6.16. The council recognises the need to continue to engage with disabled individuals and groups representing disabled people on the rollout of PFS and will continue this engagement as part of the wider PFS programme.
- 6.17. To this end, in May 2022 the council established an Islington Transport Accessibility Advisory Group which gathers officers and representatives of disability and mobility groups to discuss transport-related topics. The group provides the opportunity for community groups to advise on emerging policy related to transport and people-friendly streets at an early stage and give advice on engagement approaches, spanning exemptions to people-friendly pavements.

Engagement with statutory consultees

- 6.18. Statutory pre-implementation consultation on the proposals presented for the St Mary's Church LTN was undertaken with the following statutory and other stakeholders in October 2021: 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, Network Rail, Jeremy Corbyn MP (Islington North), Emily Thornberry MP (Islington South), Sem Moema AM (GLA). The council received confirmation from the LFB, LAS and the MPS that they had no objections to the proposals and that the camera enforced filters would not impact their

access or routes. Final designs were sent to the LFB, LAS and MPS on 16 December 2021. No responses were received from any of the other above consultees.

- 6.19. Statutory consultees have been notified about the council's intention to make the traffic order permanent. There have been no responses received.

Business engagement

- 6.20. Since the start of the PFS programme there has been ongoing engagement with Islington's business community, with a dedicated business engagement officer leading engagement for the PFS programme since February 2022.
- 6.21. Consistent with the commitment made in the October 2021 PFS Executive report, there was an increased level of engagement with businesses incorporated into the delivery process for the St Mary's Church LTN.
- 6.22. Increased business engagement in St Mary's Church ahead of implementation included: a letter sent to businesses in the proposed LTN area and on boundary roads in October 2021 informing of the intention to deliver an LTN from December 2021 and details of how to get in touch with officers from the council; pre-implementation business visits in the scheme area across two days in November 2021; further visits to Chapel Market business traders in response to concerns raised about how market delivery routes could be impacted by the proposed LTN nearby; and a meeting with the Angel Business Improvement District (BID).
- 6.23. Following on from this engagement, the proposed scheme design was amended to leave Gaskin Street unfiltered (open as a through route), after local businesses had voiced concerns that accessing Essex Road from Upper Street via Gaskin Street was essential for businesses in the area. The implementation of the LTN was also delayed from December 2021 to early 2022 following feedback from businesses that enforcing the scheme from December 2021 would negatively impact Christmas trading.
- 6.24. Businesses in the St Mary's Church LTN area were visited again as part of the public consultation on 4 April 2023. All streets within the LTN were visited during the day and officers and staff from independent transport consultancy Steer raised awareness of the consultation survey and listened to feedback from business owners and representatives (see paragraph 7.8 for a summary of the main comments received). Fuller details of this business engagement and summaries of comments from organisations are available in the consultation report at Appendix 5.
- 6.25. In consideration of the evidence gathered from business engagement, particularly concerning Cross Street, and the public consultation, it is recommended that the council continue to engage and work directly with businesses within the LTN and on measures to support them where possible. Support options, subject to resourcing, could include facilitating the creation of a trader's association, delivering on-street animations or promoting business support offers and other funding opportunities where applicable.

- 6.26. There is case-study evidence to show that high street walking, cycling and public realm improvements can increase retail sales by up to 30%. Further studies indicate that people who walk to the high street spend up to 40% more than those who drive to the high street and that cycle parking delivers five times the retail spend per square metre, compared to the same area of car parking [Sources: [Walking and cycling: the economic benefits \(tfl.gov.uk\)](https://www.tfl.gov.uk), [The value of cycling \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)].
- 6.27. Evidence gathered from the St Mary's Church LTN consultation responses indicates that more residents are choosing to walk or cycle to local shops since the introduction of the LTN and spend more time in the area. It is acknowledged that a decrease in traffic may impact some businesses, however all businesses in the LTN area remain accessible for deliveries and customers travelling by motor vehicle.

Gaskin Street

- 6.28. The original delegated decision report for the St Mary's Church scheme, published in December 2021, noted that the council was considering implementing a traffic filter on Gaskin Street at a later date, which could be enabled by lifting the banned right turn from Canonbury Road to Essex Road. A public consultation to gather feedback on the proposal to remove the banned-right turns currently in place at the Essex Road junction took place in March 2023. The council is in ongoing liaison with TfL which controls the traffic signals at this junction regarding this proposal.
- 6.29. The pre-consultation monitoring showed that traffic volumes on Gaskin Street experienced only a negligible increase in traffic flows by 6% (observed) and 5% (normalised) between November 2021 and January 2023. As traffic flows fluctuate daily, changes within -10% to +10% are considered insignificant.

7. Consultation

- 7.1. As part of the Executive decision on PFS in June 2020, the council committed to undertaking a formal consultation approximately 12 months after the implementation of each trial scheme.
- 7.2. The consultation for the St Mary's Church LTN ran from 29 March to 26 April 2023. Responses to the consultation have been analysed independently by external consultants Steer and the report is provided at Appendix 5.
- 7.3. The consultation included an online questionnaire available via the Islington Council website. Paper copies of the questionnaire were also made available at Islington Town Hall and could be requested by post.
- 7.4. 301 consultation questionnaires were submitted of which 271 were complete. 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 (including partial completions). The questionnaires

submitted indicate that 63% of respondents lived within the St Mary's Church LTN area or on a boundary road (43% within the area and 20% on a boundary road) and 31% lived outside the area. 7% provided no response.

7.5. The council used various ways to promote the consultation. Approximately 3,750 leaflets have been distributed: 2,900 to residential properties, 500 at business properties and 350 handed out or left in mailboxes during the residential door knocking exercise.

7.6. The council also promoted the consultation and encouraged people to fill in the questionnaires at:

- Targeted business door knocking, Tuesday 4 April 2023
- Online town hall, Thursday 13 April 2023
- Targeted residential door knocking, Wednesday 19 April 2023

7.7. The consultation information was shared on social media platforms including Nextdoor, Twitter, Facebook, and by press release.

7.8. Findings from the consultation events include:

- Attendees at the online town hall event and during the residents' visits expressed concern about an increase in traffic levels in the area and on boundary roads.
- Attendees at the online town hall event and during residents' visits were concerned that car drivers were parking and idling on single yellow lines on Florence Street and requested that this be changed to resident parking.
- Attendees at the online town hall event (and in subsequent emails) were concerned that vehicles are still mistaking Florence Street as a cut through to Essex Road from Upper Street, and requested the northern end of Florence Street be made one-way to prevent this.
- Attendees at the online town hall event were concerned that the Blue Badge Holder exemption does not go far enough to support people with additional mobility needs.
- Residents during the residents' visits were concerned about the impact of traffic filtering on businesses.
- Residents during the residents' visits expressed views that there had been an overall reduction in traffic in the area making it quieter, safer for children and less polluted.
- Business representatives during the business visits raised concerns about difficulties for customers in accessing their premises, difficulties with loading and deliveries and complaining of a lack of parking (Cross Street).
- Businesses representatives during the business visits raised concerns about the traffic filters contributing to additional time/fuel costs where businesses required employees to make multiple trips a day by car/van.

7.9. Findings from the analysis of responses to the consultation questionnaire include:

- Car owners and cyclists were overrepresented in the survey responses compared to ward and borough wide data. Across all respondents, 56% had access to a car/van and 33% had no access to a car/van while 11% of gave no response, or preferred not to say (compared to 33% and 67% respectively in the borough, according to 2021 Census figures).
- Those who do not own a car generally felt much more positively about the scheme than those who own cars.
- 9% of respondents who live within the St Mary's Church LTN area classified themselves as disabled (73% stated they are not disabled, and 17% did not reply or preferred not to say).
- 64% of disabled respondents stated that they owned or had access to one or more cars; 36% of disabled residents did not own or have access to a car/van.

7.10. Analysis of responses to statements about the scheme is shown below. Respondents could also choose 'no change' 'doesn't apply' or provide no response to each statement. These options are included in totals, so percentages may not sum to 100:

- 44% of respondents felt that it was easier to cross the street since the introduction of the trial. 19% disagreed with that and 32% noted no change.
- 42% felt that the streets look nicer since the introduction of the St Mary's Church LTN trial scheme. 25% disagreed with that statement, and 29% noted no change.
- 39% of respondents felt that it was easier to make necessary trips by walking and cycling since the introduction of the trial. 21% disagreed with that and 35% noted no change.
- 41% of respondents felt that there was less speeding motor traffic since the introduction of the trial. 21% noted more and 31% noted no change.
- 41% of respondents felt that there was less noise from motor traffic since the introduction of the trial. 30% noted more and 22% noted no change.
- 42% of respondents felt that there was less motor traffic on their street since the introduction of the trial. 30% noted less and 19% noted no change.
- 33% felt safer using the street at night since the introduction of the trial. 37% disagreed and 25% noted no change.
- 43% felt that cost of taxis and private hire vehicles had increased since the introduction of the trial. 3% felt they had decreased and 31% noted no change.
- 35% felt that they walk or cycle more to local shops and businesses more since the introduction of the trial. 15% disagreed with that and 41% noted no change.
- 41% of respondents felt that there was less noise from motor traffic since the introduction of the trial. 30% noted more and 22% noted no change.
- 42% of respondents felt that there was less motor traffic on their street since the introduction of the trial. 30% noted less and 19% noted no change.

- The three most frequent comments in the open text responses were 'Concern about congestion/ increase in traffic', 'Support scheme (general)' and 'Concern that the LTN has increased air pollution levels/ impacted residents/impacted health of children and vulnerable people'. Those concerns were monitored through data collection in the pre-consultation monitoring report (29 March 2023) and are discussed in Appendix 8.

7.11. The consultation report (Appendix 5) provides details on the overall responses and a breakdown highlighting differences between respondents with access to a car/van compared to respondents who do not. Respondents with access to a car/van were overrepresented in the consultation as only 33% of the respondents were from households who do not own cars whereas the average across Islington is 67% of households not owning cars.

7.12. Perceptions about the trial scheme were more negative among respondents who had access to a car/van than among respondents without access to a car/van. Percentages do not sum to 100% because respondents could also select 'no change', 'doesn't apply' or provide no response. For example:

- Residents during the residents' visits expressed views that there had been an overall reduction in traffic in the area making it quieter, safer for children and less polluted. 25% of people who own a car said the streets look nicer since the trial while 70% of people who do not own a car said the streets look nicer.
- 24% of people who own a car said they feel safer using the street in the day while 67% of people who do not own a car said they feel safer using the street in the day.
- 24% of people who own a car said the air is cleaner since the trial while 66% of people who do not own a car said the air is cleaner.

7.13. The consultation report also looks at differences in responses from those who live within the area or on the boundary road compared to those who live outside the area or nearby. 43% of respondents said they live within the area and 20% said they live on a boundary road.

7.14. The responses from those living inside the area (and on boundary roads) tended to be marginally more positive about the impact of the trial than from those living outside the area or on the boundary roads in some respects, for example 50% of people who live within the area or on the boundary roads said the air is cleaner compared to 30% of people who live outside of the area. 51% of people from within the area said the streets look nicer compared to 35% of people from outside the area.

7.15. However, in some cases those living inside the LTN were less positive about the impact of the trial, for example 61% of people living within the area or on the boundary roads felt there was less traffic on their street compared to 64% outside the LTN.

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

- Q7: Is there anything else you would like to tell us about your experience of the St Mary's Church people-friendly streets trial?
- Q8: From the outset, Blue Badge holders have been exempt from the camera-enforced filters in the St Mary's Church LTNs. Please provide any feedback on how this has been working for you, or any feedback on the policy in general.
- Q9: Are there issues in the St Mary's Church area with road danger or safety that you would like to tell us about?

7.17. A coding exercise was undertaken to analyse answers to these questions (also including themes raised in four email responses submitted to the consultation as part of question 7). A code frame per open question was used to analyse the answers. A code frame enables individually expressed sentiments to be standardised and then for the content of individual responses to be recorded (or coded) within the standardised set of sentiments. This means it is possible to see how many respondents mentioned each sentiment. Further details on the approach to free text analysis are provided in the St Mary's Church consultation report (Appendix 5). The most common issues raised in answers to question 7 and emails submitted to the consultation were:

- Concern about congestion/ increase in traffic (19%)
- Support scheme (general) (18%)
- Concern that the LTN has increased air pollution levels/ impacted residents/impacted health of children and vulnerable people (17%)
- Concern the LTN has displaced traffic elsewhere/impacts other areas (13%)
- Concern about longer journey times (9%)

7.18. 28% of respondents did not provide a response to question 7.

7.19. The most common issues raised in answers to question 8 (comments about the Blue Badge Exemption policy) were:

- Suggest that an exemption wider than for just Blue Badge Holders should apply to the LTN, i.e. for all local residents, taxis, delivery vehicles, parking permit holders, EVs, tradesmen (9%)
- Support for the Blue Badge Exemption Policy as is (no further detail given) (4%)
- Concern about impact on those who rely on taxis / vehicles for transport due to limited mobility (3%)
- Concern about impact on disabled/people with limited mobility who may not qualify for a Blue Badge (3%)
- Concern that Blue Badge holders and residents are unaware of Blue Badge exemption/exemption areas (2%)

- 7.20. 69% of respondents did not provide a response to question 8.
- 7.21. The most common issues raised in answers to question 9 were:
- Concern that LTN increases traffic / ineffectual in reducing traffic (7%)
 - Concern the LTN has caused an increase in aggressive driving and e-bike/moped/motorbikes using pavements endangering pedestrians (6%)
 - Concern that the LTN does not improve pedestrian safety / environment / pedestrian safety continues to be poor (5%)
 - Concern about speeding vehicles within the LTN and on boundary roads (5%)
 - Concern that people cycle dangerously / speed / anti-social cycling / parking (5%)
- 7.22. 55% of respondents did not provide a response to question 9.
- 7.23. The most common issues raised from the trial feedback survey and the consultation survey 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.
- 7.24. The positive themes were:
- Support for scheme (general) (10%)
 - Other positive comments (6%)
 - Noise pollution has improved (5%)
- 7.25. The negative themes were:
- Congestion/increase in traffic (26%)
 - Journeys have become longer/more inconvenient (13%)
 - Concern about increase in air pollution/impact on health (10%)

8. Developing a Liveable Neighbourhood for St Mary's Church

- 8.1. While the intention of this report is to make the St Mary's Church LTN permanent, this does not suggest that there will be no further investment in the area.
- 8.2. As set out in the council's Executive report from 12 January 2023, it is the council's ambition to return to all LTN areas that are made permanent and implement wider public realm improvements that will make the areas liveable neighbourhoods.
- 8.3. To enhance the LTN and make it a liveable neighbourhood the council will continue to explore more public realm improvements such as improvements to pavements as part

of the PFP programme and greening in collaboration with residents.

- 8.4. The PFP programme was launched in 2021 and aims to make Islington's pavements more accessible through introducing measures such as footway repaving, dropped kerbs, improved foliage maintenance, tactile paving and street clutter removal. Locations for improvements are identified by carrying out an audit of streets in each ward, liveable neighbourhood or existing LTN. The council's ambition is to implement a series of pavements improvements in all existing LTNs as well as future liveable neighbourhoods. The accessibility audit for St Mary's Church took place in January 2022.
- 8.5. Pavement improvements were duly incorporated in the St Mary's Church LTN area where the south-west section of Canonbury Square meets Canonbury Lane. The pavement build-out at this location has made it easier and safer for local people to access the green space in the middle of Canonbury Square.
- 8.6. Consistent with the commitment in the October 2021 PFS Executive paper on contributing to 'greening' of the borough, planters were installed at all four traffic filter locations in the St Mary's Church neighbourhood. Further greening will take place, for instance, through the Greener Together programme. It is the council's ambition to invest in additional greening initiatives in St Mary's Church in the future, having regard to feedback from residents and other stakeholders received during the consultation.
- 8.7. The council will continue to address the issue of mopeds mounting the pavements to avoid camera enforcement through additional monitoring, enforcement and further education and engagement with offenders.

9. Section 122, Road Traffic Regulation Act 1984

- 9.1. 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.

- 9.2. In balancing the considerations above, officers consider that St Mary's Church LTN should be made permanent for the following reasons:
- 9.3. Access, including for motorised traffic, is maintained to all residential and other properties, albeit access routes for motorised traffic (except for emergency services vehicles and Blue Badge holders who live in the St Mary's Church LTN) may change, which may cause inconvenience to some residents.
- 9.4. All local amenities remain accessible, albeit routes for motorised traffic (except for emergency services vehicles and Blue Badge holders who live in the St Mary's Church 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 Blue Badge holders who live in the St Mary's Church LTN), including heavy commercial vehicles, and thereby a significant improvement to the amenity of the area.
- 9.5. The continued reduction of through traffic in the St Mary's Church LTN is expected to improve air quality on the local streets within the area. Future PFS measures aim to further mitigate the impacts of traffic on some of the internal through routes in the scheme area, namely Canonbury Lane and Canonbury Square. Evidence from similar projects in London shows that over time this increased traffic volume reduces as people make different travel choices in response to them – traffic spreads out across the day, and air quality does not get worse. Other measures, such as the council's introduction of Electric Vehicle Charging Points, the recent introduction of the Ultra-Low Emission Zone and recent extension in October 2021 (which covers the whole of Islington and will be expanded from August 2023 across all London boroughs) and the introduction of School Streets, are likely to contribute to improving air quality.

10. Human Rights

- 10.1. 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.
- 10.2. 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 the scheme, 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.
- 10.3. 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.
- 10.4. 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 making permanent the St Mary's Church LTN 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.

- 10.5. 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.

11. Implications

11.1. Financial Implications

11.1.1. **Costs**

- 11.1.2. The total cost to make the St Mary's Church LTN permanent will be £2,750 which is the cost for the permanent traffic order advertisement, for printing decision leaflets to be sent to residents and the cost of distributing these leaflets to properties in the LTN and on its boundary.

- 11.1.3. 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.

11.1.4. **Revenue**

- 11.1.5. There is no loss of revenue anticipated with the making permanent of the St Mary's Church LTN.

- 11.1.6. 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 considered as part of the medium-term financial planning process.

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

- 11.1.8. 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 six enforcement cameras (at four locations) enforce the 'no motor vehicle' restrictions in the St Mary's Church LTN. The revenue from these cameras will continue to contribute to the overall parking revenue targets.

11.2. Legal Implications

- 11.2.1. The council implemented the St Mary's Church LTN using ETOs made under Section 9 of the Road Traffic Regulation Act 1984. An ETO may not last longer than 18 months.
- 11.2.2. Once an ETO is in place, any person may object to the making of the ETO becoming permanent within a period of six months beginning with the day on which the ETO comes into force or, if the ETO is varied by another order or modified pursuant to section 10 of the 1984 Act, beginning with the day on which the variation or modification or the latest variation or modification comes into force. Objections received must be considered before any permanent order is made.
- 11.2.3. The council may implement the St Mary's Church LTN and make a permanent TMO under section 6 of the Road Traffic Regulation Act 1984.
- 11.2.4. 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
- 11.2.5. 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 ...".
- 11.2.6. "Traffic" includes pedestrians.
- 11.2.7. The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 set out the procedures for making an ETO permanent.
- 11.2.8. All signage related to the scheme should be compliant with Traffic Signs Regulations and General Directions 2016.
- 11.2.9. 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.

11.2.10. This is dealt with in the EqlA (Appendix 3) and this assessment is summarised below in section 11.4.

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

11.3.1. Continuing the St Mary's Church LTN as a permanent scheme and making active travel the easiest option are identified as 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. 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.

11.3.2. However, there may also be cases where motorists take longer routes, leading to additional emissions and congestion elsewhere, including on boundary roads of LTNs. On balance, it is expected that the overall emissions (including carbon emissions) and congestion will reduce on the roads within the schemes and surrounding areas as more residents and others are encouraged to travel by sustainable means of transport, including by other measures such as ULEZ.

11.3.3. Making the St Mary's Church LTN permanent will have some direct environmental impacts as leaflets will need to be printed and distributed to residents and businesses to make them aware of the scheme becoming permanent. As no changes are planned to the LTN, there will not be any environmental impact from road works

11.4. Equalities Impact Assessment

11.4.1. 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.

11.4.2. An EqlA was completed for making the scheme permanent. The full EqlA is attached in Appendix 3 and is summarised in this section.

11.4.3. In some instances, a balanced view is taken between positive and negative impacts, in particular where the impacts are considered to have both a positive and negative impact on one group with protected characteristics, especially where there is variation between the requirements of different individuals within such a group. For example, while some disabled people may rely on cars for mobility there are also many disabled people who use other modes and therefore

for most groups the impacts will be a mix of positive and negative depending on the particular mode of travel generally used.

11.4.4. **Positive Impacts**

11.4.5. By becoming permanent, the St Mary's Church 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 and reduce injuries from road traffic collisions, as well as improving air quality. The measures also contribute to the council's response to climate change by reducing emissions, adapting our streets to be more resilient to urban heat through greening, which can benefit older people, as well as those living in flats.

11.4.6. People who are Blue Badge holders who live within the St Mary's Church LTN and have access to a vehicle (either their own, or a carer's who could be a family member or friend) will continue to benefit from the exemptions at the camera-enforced filters. The generally positive impacts of LTNs on local traffic levels means less congestion for exempt vehicles, and those who need to drive.

11.4.7. Children who have disabilities or mobility impairments will also continue to benefit from the Blue Badge exemption and the Individual Exemption policy may also benefit some children who, for example, attend a school in a neighbouring LTN. It is also the case that older people with limited mobility who travel by private car may have Blue Badges and will continue to benefit from the policy. The positive impacts of LTNs on local traffic levels, as evidenced by monitoring of the scheme, means less congestion for exempt vehicles on internal and boundary roads overall.

11.4.8. **Negative Impacts**

11.4.9. 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. This includes continued engagement with people with protected characteristics and reviewing impacts of exemptions, i.e. the volume of traffic travelling through the LTN areas.

11.4.10. People with disabilities who rely on taxis and private hire vehicles (PHVs) will not benefit from the existing exemption policy for Blue Badge holders. However, the Blue Badge exemption has been expanded to allow a Blue Badge holder to nominate a vehicle to receive the exemption on their behalf regardless of where the vehicle is registered; this could be a carer, neighbour or family member that supports them in their day-to-day life.

11.4.11. In January 2023, the council introduced an 'Individual Exemption' policy trial for those who are currently not covered by the Blue Badge exemption policy.

- 11.4.12. Robust monitoring and mitigation plans are outlined in the EqIA 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.
- 11.4.13. As discussed in the 'Overview' paragraphs at the start of section 3 of the programme-wide RIA published in October 2021, 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.

12. Conclusion and reasons for the decision

- 12.1. **Summary:** The St Mary's Church LTN scheme is working well and has met its objectives, covering traffic reduction, the public health benefits of switching motor vehicle trips to active travel, and with no negative impact on air quality. Paragraph 7.24 of this decision report and Appendix 6 show an assessment of the most common negative themes and objections to the scheme. It is considered that the points raised in these objections are not contrary to ETO process, have been considered as part of the EqIA or are known outcomes or objectives of LTNs that are outweighed by the benefits achieved.
- 12.2. **Recommendation.** The Director of Climate Change and Transport is asked to agree the proposal set out in this report, namely, to make the St Mary's Church LTN trial permanent.

In making this decision the Director of Climate Change and Transport needs to assess if the trial has largely achieved the objectives of the LTN and balance those benefits with the potential disadvantages that could be caused by making the scheme permanent. To assess this the monitoring data needs to be considered and weighted against the consultation responses and objections received for the scheme.

- 12.3. **Assessment of benefits.** The St Mary's Church LTN aims to encourage local people to walk and cycle in their neighbourhood and reduce unnecessary journeys by motor vehicle, particularly shorter journeys that could be carried out by means of active travel. A reduction in vehicle usage also supports safer cycling routes throughout the LTNs. 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.
- 12.4. Appendix 8 (Table 1) highlights where there is some evidence from the monitoring data and consultation results that the trial has generally achieved the objectives.

- 12.5. **Assessment of disadvantages.** The council committed to duly consider all feedback and objections received on the schemes and also monitor potential negative impacts of the scheme. In Appendix 8 (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.
- 12.6. In conclusion, the Director for Climate Change and Transport is asked to agree to the proposal set out in this report, namely making the St Mary's Church LTN trial permanent.
- 12.7. **Reason for recommendation.** Making the scheme permanent is recommended because there is clear evidence that the scheme is meeting many of its overall objectives covering road danger reduction, traffic reduction, the public health benefits of encouraging people to switch motor vehicle trips to active travel, no negative impact on air quality and no significant impact on Crime and ASB or emergency services response times as supported by monitoring and consultation results. Potential negative impacts related to traffic increases or emerging from the consultation results and/or objections are intended to be mitigated by the council with future measures, not supported by monitoring data, not contrary to ETO processes, have been considered as part of the EqIA or are known or intended outcomes of LTNs that are outweighed by the benefits achieved.

13. Record of the decision

- 13.1. I have today decided to take the decision set out in Section 2 of this report for the reasons set out above.

Signed by:



Martijn Cooijmans

Director of Climate Change and Transport

Date: 30 June 2023

Appendices:

- Appendix 1 – Scheme map
- Appendix 2 – Resident next steps leaflet
- Appendix 3 – Equalities Impact Assessment

- Appendix 4 – Pre-consultation engagement report
- Appendix 5 – Independent consultation report (Steer)
- Appendix 6 – Responses to objections
- Appendix 7 – Pre-consultation monitoring report
- Appendix 8 – Assessment of benefits and disadvantages

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