

Appendix 2

Officer responses to formal objections

Objection Theme	Officers response
<p>Air quality & noise pollution The scheme reduces air quality / does not improve air quality.</p> <p>The scheme causes increased noise pollution</p>	<p>One of the objectives of the implementation of Cycleway 38 is to make it easier and safer to walk and cycle as a first choice for local travel. Only 29% of Islington households have access to a car and 36% of journeys taken in London are short, between 600 metres and 1.5 kilometres, we would like to reduce these car journeys not create more car journeys.</p> <p>Based on one air quality monitoring site on Liverpool Road at St. Mary Magdalene Academy, air pollution has remained below the annual objective average level of 40µg/m³ for nitrogen dioxide (NO₂). This broadly reflects borough-wide trends, suggesting that the Cycleway 38 trial has not had an adverse impact on air quality.</p> <p>From the available data, it is not possible to conclusively attribute specific impacts of the Cycleway 38 scheme on air quality levels given that the trend is similar to the borough wide average. Post-implementation levels of NO₂ were generally below the levels of the comparable months up to February 2020, after which time the effect of the first national lockdown indicates a substantial impact.</p> <p>Noise pollution: Monitoring of traffic volumes have shown on average a negligible change in motor traffic volumes and traffic speeds along the route. Noise is measured in Decibels and with the most common metric used (the L_{Aeq} or equivalent continuous sound pressure level – it can be thought of as the average) it is typically considered that 3dB is the minimum difference that humans can perceive. For a 3dB increase in motor traffic noise along an existing road there would need to be a doubling in the number of vehicles. From this it can be assumed that the change in traffic noise for residents along the Cycleway is negligible. The volumes of cycling, a quiet form of transport, along the cycleway have increased significantly.</p> <p>The council’s pre-consultation monitoring data which can be found on our website: https://www.islington.gov.uk/roads/cycling/holloway-road-to-pentonville-road</p>
<p>Pedestrian Safety The cycleway and removal of pedestrian crossings makes it difficult for</p>	<p>Because of the delay in receiving collision data from the Department for Transport due to the amount of time that is required to process the information, we do not yet have any comparable collision statistics for C38 as data for 2021 is not expected to be released before June this year.</p>

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<p>pedestrians to cross the road.</p> <p>The scheme does not improve pedestrian safety / environment / pedestrian safety continues to be poor.</p>	<p>The council has not had any official reports of collisions between people cycling and people walking along the route though anecdotally some collisions have been reported but not confirmed.</p> <p>We take road danger reduction very seriously and feedback through the trial has raised concerns regarding pedestrian safety.</p> <p>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 a strategic network of cycleways borough-wide, and both were adopted by the council's Executive in November 2020.</p> <p>Pedestrian safety is very important to the council and is a priority when designing any scheme. As is standard for highway schemes, the design was subject to an independent Road Safety Audit prior to being implemented and once operational. Our schemes are also reviewed internally by all the relevant departments within the council prior to implementation.</p> <p>We work closely with the emergency services before implementing our schemes and consult them at the end of the trial to help inform our decision and outcome of the trial.</p> <p>The design of the cycleway was produced with consideration of all current regulations and guidance. All controlled crossings (zebra Crossings and signalised junctions) have been retained and are evenly spaced along the length of Liverpool Road. The council decided on balance to remove the pedestrian islands so that segregated cycle lanes could be provided. Four islands were removed from zebra crossings and one was removed from an uncontrolled pedestrian crossing near Barnsbury Street. This uncontrolled crossing point was located 36m from a retained Zebra Crossing. The other three islands removed were not pedestrian refuges but were traffic islands to narrow the road.</p> <p>The crossings meet regulation guidelines.</p> <p>However, having listened to concerns raised around the removal of the pedestrian refuges at the zebra crossings on Liverpool Road, especially at the Cloudesley Square and Richmond Avenue zebra crossings, if the scheme is retained, engineering solutions and signage options will be explored and brought forward to improve these crossings where possible.</p>

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<p>Safety for people cycling The scheme does not improve cyclist safety / cycle safety continues to be poor</p>	<p>Because of the delay in receiving collision data from the Department for Transport due to the amount of time that is required to process the information, we do not yet have any comparable collision statistics for C38 as data for 2021 is not expected to be released before June this year.</p> <p>We take road danger reduction very seriously and feedback through the trial has raised concerns regarding safety for people cycling.</p> <p>The council has not had any official reports of collisions between people cycling and people walking along the route though anecdotally some collisions have been reported but not confirmed.</p> <p>We take safety for people cycling very seriously and feedback through the trial has raised concerns around safety where there is the cycleway and floated parking and at some junctions.</p> <p>Monitoring has shown an increase in people cycling of 33%.</p> <p>Safety for people cycling is very important to the council and is a priority when designing any scheme. As is standard for highway schemes, the design was subject to an independent Road Safety Audit prior to being implemented and once operational. Our schemes are also reviewed internally by all the relevant departments within the council prior to implementation.</p> <p>Where there are parking bays next to the cycle track it has been designed so that there is a 500mm space between the parking bay and the cycle track; whilst we would have preferred a larger buffer zone, the 500mm achieved should nevertheless provide enough space for people to access their vehicles safely.</p> <p>All new cycling provision in London should conform to the Cycle Route Quality Criteria, which are based on the London Cycling Design Standards (LCDS). The relevant sections of the LCDS that deal with using parking as a separation between the main carriageway and a segregated cycle track are pages 23-24 of Chapter 4. This states that "Kerbed island separation or light segregation ... that provides a buffer zone of at least 0.5 metres between cyclists and parked cars is recommended in order to minimise risk of collision between cyclists and car doors."</p> <p>There are sections of advisory and unsegregated cycle lanes where business loading is permitted i.e. on Penton Street south of White Lion Street, the bay adjacent to the Business Design Centre and on Liverpool</p>

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	<p>Road between Richmond Avenue and Barnsbury Street, which therefore provides a lower level of separation from traffic for people cycling at these locations than elsewhere on the cycle route. This may have a wider impact of preventing some people from using the cycle route; although scheme monitoring has shown an increase in people cycling along the route of 33% there could be additional suppressed demand.</p> <p>The junctions have been designed with the correct visibility splays to enable people cycling to be seen; however, after implementation the junctions of Liverpool Road and Barnsbury Park, and Liverpool Road and Lofting Road had parking bays suspended either side of the junction to improve inter-visibility between motor vehicles and people using the cycleway. If the scheme is retained, all the junctions will be reviewed to consider if any further changes are desirable.</p> <p>The recent update of the Highway Code has reminded all road users that drivers of motor vehicles have to give way to people walking and cycling at junctions.</p>
<p>Access / changes to parking The scheme reduces accessibility and safety for older residents or disabled people and access for delivery / freight / refuse collection / taxis and private hire vehicles / health care workers.</p> <p>Concern that the scheme reduces access for emergency services.</p>	<p>We have received reports that some people who used the parking that was removed along Liverpool Road now have to park further away. Some older people, people with disabilities, pregnant women or women with very young children who used this parking may have been inconvenienced by these changes.</p> <p>To accommodate the cycle lanes, a number of parking spaces had to be removed. Out of a total of 293 resident parking spaces along Liverpool Road, 96 were removed including all parking along the right side of Liverpool Road between College Cross and Tolpuddle Street.</p> <p>There has been no loss of disabled parking spaces.</p> <p>Our parking surveys showed that demand for 80 of these spaces can be met by the remaining parking on Liverpool Road as many spaces are underused. Demand for the remaining 16 spaces can be met on side roads close to Liverpool Road. The locations of the parking spaces proposed for removal are shown in the plan in the attached leaflet.</p> <p>A parking occupancy survey was carried out over three days in early 2020 (on Tuesday 28th January, Wednesday 29th January and Saturday 1st February) as part of the C38 route Liverpool Road route alignment assessment.</p> <p>The data gathered for the assessment was chosen to represent:</p> <ol style="list-style-type: none"> the peak occupancy demand hour, i.e. 03:00am when most residents are home; and a representative inter-peak demand scenario, i.e 10:00am when residents who drive to work or daily activities would have left.

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	<p>Currently there are no plans to convert any pay by phone bays into resident parking bays on the route.</p> <p>Islington’s Inclusive Design SPD requires that there is parking or drop-off/pick-up points no more than 75 metres from the homes of disabled and vulnerable people. Distances between pick up/drop off and parking and homes vary along the route but the remaining parking and proximity of side roads along the route should ensure that the policy requirement is met. This can be mitigated by providing allocated parking to disabled users if requested and the requirements are met.</p> <p>Along the length of this route the drop-off and pick up of passengers using taxis or private cars is possible from side roads or the nearest free parking space. Parking bays are retained in each section and there are parking bays on side roads nearby which can be used for unloading. Health care workers and delivery drivers should also use the nearest free parking space or side roads.</p> <p>Taxis can still pick up and drop off passengers on double yellow lines that do not have loading or waiting restrictions, taking care not to cause an obstruction or a safety hazard.</p> <p>Passengers requiring the deployment of wheelchair ramps can use side roads or the nearest free parking space.</p> <p>There have been some changes to where emergency service vehicles can access the kerb along the Cycleway 38 route in locations where traffic wands have been installed. For every stretch of 30 metres of traffic wands along the route there is a break of 8 metres to allow for emergency vehicle access to the kerb. In consultation the emergency services have not reported any delays caused by the scheme and have no objections to the scheme being made permanent. The royal mail also stated no objection to the scheme being made permanent.</p> <p>One objection claimed that there was an “increased risk of dangerous driving because of driver frustration as a result of cars pulling up behind vehicles parked in the floating car parking thinking they are in a traffic queue and related increased congestion”. Road markings have been introduced to mitigate against this.</p>
<p>Parking and safety Concern that the floated parking situation is dangerous.</p>	<p>Because of the delay in receiving collision data from the Department for Transport due to the amount of time that is required to process the information, we do not yet have any comparable collision statistics for C38 as data for 2021 is not expected to be released before June this year.</p>

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<p>Risk of collision between pedestrians, cyclists and motor vehicles by floated parking, in the cycle lane, at crossings and junctions.</p> <p>People parking in the floated parking feel that because of the narrowing of the carriageway it is difficult to get in and out of their vehicles</p>	<p>The council has not had any official reports of collisions between people cycling and people walking along the route though anecdotally some collisions have been reported but not confirmed.</p> <p>The new section of floated parking adjacent to the stretch of high pavement on Liverpool Road between Tolpuddle Street and Richmond Avenue has created a negative impact for some residents wanting to use the parking bays. The combination of the cycle lane, the high pavement, the floated parking and the limited points of access to the parking, created by the high pavement, requires people to walk across and sometimes in the cycle lane to get to the floated parking spaces.</p> <p>The sections of floated parking have also created a potential risk of conflict between people cycling in the lanes and people parking, with a risk of being hit by opening of vehicle doors.</p> <p>To provide space between the floated parking and the cycle lane a 500mm buffer zone was incorporated into the trial scheme to allow people enough space to get in and out of cars without encroaching into the cycle lane, however throughout the scheme and in the public consultation, both people walking and people cycling have reported feeling unsafe in this section, with the fear of a collision being the greatest concern. The buffer zone between cycle lane and the parking bay was not marked, and there is some evidence that some vehicles were parked over the buffer zone, reducing its effective width. If the scheme is retained the council will investigate possible solutions, such as improvements to the line marking to mitigate against this.</p> <p>The carriageway widths are built to regulation standards and have been subject to an independent road safety audit.</p>
<p>Scheme Design and safety</p> <p>The scheme is ill thought-out / not responding to the problems of the area / scheme objectives.</p>	<p>Safety is very important to the council; the scheme was designed to regulation standards and reviewed internally across the relevant departments prior to its introduction as a trial scheme.</p> <p>In 2019, the council consulted on its draft Islington 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 a strategic network of cycleways borough-wide, and both were adopted by the council's Executive in November 2020.</p> <p>As is standard for highway schemes, the design was subject to an independent Road Safety Audit prior to being implemented and once operational. A Road Safety Audit (RSA) is a mandatory process that is</p>

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	<p>undertaken prior to and after implementation. Once the RSA has been written it is then reviewed internally before being sent back to the independent auditor who carried out the RSA. Schemes are also reviewed internally by all the relevant departments within the council prior to implementation.</p> <p>It has been reported that vehicles are swerving around the speed humps and encroaching into the cycle lanes, it has also been reported that the proximity of the wands to junctions or entrances to drives are causing concern. If the scheme is retained the scheme design including the traffic calming and wand separation will be reviewed and improved where possible.</p> <p>Some of the objections state that there is not enough room for two lanes of traffic and two bike lanes and that at various points on the road it is now not safely possible for two-way traffic to flow. The scheme, including the cycle lanes and carriageway widths, were designed to regulation standards and reviewed by the emergency services. There is sufficient space along the route for two-way traffic to flow.</p> <p>The carriageway widths are built to regulation standards and have been subject to an independent road safety audit.</p> <p>The emergency services did not object to the scheme being made permanent in the post-implementation consultation.</p>
Emergency services response times	<p>Comparing the 2019 average response time and the post-implementation period average, there was a slight increase in both the number of mobilisations and average attendance time for London Fire Brigade (LFB) vehicles. However, given the extent of variables that affect response times, the differences between the 2019 baseline, the 2020 pre-implementation period and the post-implementation 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 Cycleway 38 scheme has not impacted the 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 C38 monitoring report. None of the emergency services have objected to the scheme being made permanent in the recent consultation.</p>
Route alignment Cyclists are still choosing other	<p>Islington and TfL assessed the route options for this section of Cycleway 38 as a north-south cycleway linking Farringdon and Finsbury Park.</p>

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<p>routes (i.e. Thornhill road).</p>	<p>Although the route that includes Barnsbury Road, Thornhill Road and Sheringham Road is well-used by people cycling, along much of its length traffic volumes were found to be above the thresholds that are acceptable in design standards without physically separating cycles from traffic. On those roads it was considered that there was not space to provide segregation and therefore it did not meet TfL's criteria for a cycleway, whereas on Liverpool Road there was greater scope to do so. Liverpool Road is also a more closely parallel alignment to Holloway Road.</p> <p>Monitoring has shown that on average across the Cycleway 38 route cycling has increased by 33%.</p> <p>All sites on C38 itself showed increases in cycling, with the highest being 96% on Tolpuddle Street.</p> <p>The greatest numerical increase along the route was an increase of 513 cycle trips per day, which was recorded just south of Barnsbury Street on Liverpool Road.</p> <p>On Liverpool Road south of Tolpuddle Street, a count location just to the south of the C38 route, indicated that there was a reduction in cycling volumes, with -16% between August/September 2020 and September 2021. This may be a result of people cycling changing route to follow C38 at this location</p>
<p>Increase in traffic, speeds and Heavy Goods Vehicles Concern that the scheme increases vehicle traffic vehicles speeds and the number of heavy goods vehicles using Liverpool Road.</p> <p>Concern about speeding vehicles within the scheme.</p>	<p>Monitoring has shown that along the route, average speeds have negligibly changed (+6.5% by February 2021 and -1.5% by September 2021), and 85th percentile speeds demonstrate very similar negligible change.</p> <p>The proportion of vehicles speeding does not show a significant change, although there are some significant changes at individual sites. Two sites along the route saw a significant increase in the proportion of vehicles speeding: Liverpool Road north of Barnsbury Street and Liverpool Road south of Barnsbury Street. Further monitoring may be required to understand why these particular locations have seen this rise, and whether these are related to short-term factors such as the temporary roadworks in the area at the time, or if they are part of a long-term trend.</p> <p>Liverpool Road saw a mixture of both increased and reduced volumes of vehicles speeding. Whilst average speed has dropped near Furlong Road and Cloudesley Square with over 1,700 fewer vehicles speeding over seven days, in contrast, near Barnsbury Street average speeds increased with over 1,500 more vehicles speeding at these points. This results in overall average speeds increasing on sites not on Cycleway 38, but decreasing at those on the Cycleway 38 route.</p>

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	<p>The volume of LGVs has increased at all sites at the 12 months data collection compared to the baseline. These increases vary from 2% to 90%, although the latter is from a low base of 55 LGVs per day at Madras Place. The largest observed increase was of 410 LGVs on Liverpool Road north of Barnsbury Street. The volume of HGVs has increased at all but two sites, Liverpool Road north of Barnsbury Street and Liverpool Road south of Barnsbury Street. Many of these percentage changes are large, although at all sites except Liverpool Road north of Barnsbury Street the baseline was fewer than 100 HGVs per day.</p> <p>The council is committed to reducing unnecessary and inefficient goods vehicle trips in Islington and will be looking again at ways of introducing and enforcing effective local lorry controls to protect residents and vulnerable road users from the negative impacts of goods vehicle through traffic.</p> <p>A number of policies within the Islington Transport Strategy set out the council's commitment to rolling out a Lorry Control Scheme and enforcement measures to keep HGV through traffic off residential roads and on the strategic route network, including a commitment to "introduce lorry control schemes on all local streets."</p> <p>Liverpool Road is part of the 7.5 tonne lorry control area and measures are being explored as to how the council can better enforce this. The further rollout of local lorry controls is integrated into the people-friendly streets programme and as part of this programme the council is committed to reducing unnecessary and inefficient goods vehicle trips in Islington and is looking at ways of introducing and enforcing effective local lorry controls to protect residents and vulnerable road users from the negative impacts of goods vehicle through traffic, including Liverpool Road.</p>
<p>Lack of consultation lack of consultation / undemocratic method for consultation (e.g. consultation won't be listened to).</p>	<p>A common concern raised in the objections to the Cycleway 38 trial was a lack of consultation before the implementation of the scheme. 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 experimental traffic order (ETO) process do not require public consultation prior to the start of the trial, although the council did in fact engage with the public before implementing people-friendly streets schemes, including Cycleway 38. More details on the legal status of implementing the Cycleway can be found in Section 5 of the Delegated Decision Report on the Road Traffic Regulation Act 1984, and Section 6 on Legal implications. Although there was no formal consultation prior to implementing the Cycleway as a trial, the council stated from the outset that the trial would be assessed by both</p>

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	<p>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 will feed into the decision-making process on the future of C38. Data from the consultation process has been recorded and presented as an independent report provided at appendix 5 of the delegated decision report.</p>
<p>Behaviour of cyclists people cycle dangerously / speed / aggressively when cycling.</p>	<p>An increase of 33% in cycling volumes along the route is significant and would be noticeable to people using the streets in the area. All road users, including people cycling, should obey the Highway Code.</p> <p>Islington Council offers free cycle skills training for adults and children to enable people to cycle more confidently and safely on the road. 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 is the perception that sharing the road with motor vehicles is too dangerous, so by providing a safer space separated from motor vehicles people who would like to use a cycle as transport should be encouraged to do so.</p>
<p>Negative impact on local residents Concern that the scheme has a negative impact on local residents and their visitors (reduced quality of life, stress, anxiety, confusion, exacerbates poor mental health).</p>	<p>Resident Impact Assessments (RIAs) were carried out in 2020 for each people-friendly streets scheme which identified potential negative impacts that the trials could have on people who have protected characteristics. These RIAs set out an initial plan to monitor the trials, and mitigate any negative impacts which were observed. A Resident Impact Assessment was carried out in August 2020 for the Cycleway 38 scheme which identified potential negative impacts that the trial could have on people who have protected characteristics.</p> <p>An updated RIA (now Equalities Impact Assessment (EqIA)) has been completed to inform the 2 March 2022 Delegated Decision report, finding that:</p> <ul style="list-style-type: none"> • The implementation of the southern section of the C38 cycle route has delivered positive impacts overall in terms of supporting public health, improved air quality, and accommodating and enabling active travel. • The main beneficiaries of the response have been people cycling, due to the creation of cycle lanes protected from traffic. • However, the updated EqIA has identified negative impacts for Age, Disability and Pregnancy and Maternity groups due to the changes to vehicular access to the kerbside. • The removed pedestrian refuges from the zebra crossing and informal crossing points have made some users feel less safe whilst using them.

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	The EQIA proposes actions to mitigate the negative impacts identified.
<p>Electric vehicle charging Electrical vehicle charging should be reinstated (e.g. on Liverpool Road)</p>	<p>The charging points that were installed along Liverpool Road were decommissioned because they posed a significant risk if someone were to plug a vehicle into a charging point with a cable crossing the cycle lane. In order to reduce waste, we intend to reuse these charge points by retrofitting them to other lampposts. The council recently installed lamppost charging points on Lonsdale Square, Hemingford Road and Ellington Street to help compensate for the loss of charging points on Liverpool Road. We are also planning to install more charging points later this year. A map of all the existing and proposed charging points in Islington can be found at this webpage.</p>