

Theme/Topic of Objection	Officers' response
<p>I have not been consulted about my views on the scheme</p> <p>Residents and businesses, who are suffering have not been properly consulted</p> <p>The Council is required to revise its consultation plans so that all residents of a LTN scheme must be consulted, not just the "beneficiary" streets as it is the perimeter roads which are being negatively affected by additional traffic and higher pollution</p>	<p>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 the start of the trial.</p> <p>In making the ETO, the Council must follow the procedure set out in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 (as amended by the Traffic Orders Procedure (Coronavirus) (Amendment) (England) Regulations 2020). It has followed this procedure, including consultation of relevant bodies.</p> <p>The Council has also considered the application of relevant provisions of the Human Rights Act 1998 and the Equality Act 2010. It is not considered that the implementation of these ETOs will impede the rights of individuals.</p> <p>Consultation was carried out on the Islington Transport Strategy (in 2019) and the net zero carbon strategy (in 2020). The former had made the case for the introduction of measures aimed at enabling a reduction in motor traffic, enabling more people to walk, cycle and wheel and lead active lifestyles, reducing road danger and reducing the impact of transport on local air pollution and climate change. The Islington Vision 2030 (Net Zero Carbon) Strategy is a response to the Climate Change Emergency that the council declared in June 2019, and it identifies the PFS programme as a significant contributor to delivering the transport priority of reducing vehicular emissions in the borough by encouraging walking, cycling and public transportation.</p> <p>Section 9 of the Road Traffic Regulation Act 1984 enables the Council to make experimental traffic orders (ETOs) to deliver our people-friendly streets schemes, prior to a public consultation. In deciding whether to make an order under section 9, the Council must comply with the provisions of section 122 of the 1984 Act which requires the Council to exercise that function (as far as practicable having regard to the matters specified below) to secure the expeditious, convenient, and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway. The specified matters are:</p> <p>(a) the desirability of securing and maintaining reasonable access to premises;</p> <p>(b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by</p>

	<p>heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;</p> <p>(bb) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);</p> <p>(c) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and</p> <p>(d) any other matters appearing to the local authority to be relevant.</p> <p>The Council has complied with Section 122, balanced the various considerations, and concluded that implementing the ETO is the appropriate decision.</p> <p>Further, when deciding whether to make a traffic order the Council must have regard to the Mayor of London's Transport Strategy (sections 142 and 144(1)(a) Greater London Authority Act 1999) and it has done so that strategy emphasises the importance of reducing emissions and improving air quality.</p>
<p>Journey times have become longer/more inconvenient</p>	<p>The council's analysis of the impact of the Amwell scheme on boundary roads (found in the 12 month, pre-consultation monitoring report) includes monitoring of travel times using a smart traffic analysis system called INRIX. Average travel times are measured during an AM (0700-1000) and PM (1600-1900 peak) and pre-implementation travel times (September 2020) are compared against post-implementation travel times (October 2021). On Rosebery Avenue (both directions of traffic) the increase in journey times during both AM & PM peaks across 7 days was a difference of 00minutes and 02 seconds. Pentonville Road was a difference of 00m04s, Kings Cross and Farringdon Road (between Rosebery Ave and Acton Street) was an average of 00m07s. There was no change in average journey times during peak hours on Penton Rise. Amwell Street only has southbound data available from 2020 for comparison, and journey times have decreased by 00m17s. However unexpected utilities works took place on Amwell Street during the traffic counts which would have affected traffic volumes and journey times at the count site. The objective of people friendly streets is to reduce the overall number of trips, not to displace all traffic from local streets onto main roads. This will only happen if some car trips are replaced by walking, wheeling or cycling. For some journeys the filters will make driving more inconvenient and are in this way designed to encourage those who don't need to drive to choose a different way to travel, especially for short trips. Every journey switched from driving to active travel removes a car from the road and leaves the roads clearer for people who have no other choice but to drive.</p>
<p>Scheme has caused an increase in traffic and/or pollution on</p>	<p>The objective of people friendly streets is to reduce the overall number of trips, not to displace all traffic from local streets onto main roads. This will only happen if some car trips are replaced</p>

<p>main/boundary roads in the area</p> <p>Air quality will not improve if road mileage increases, that is what LTNs are doing, displacing traffic and increasing mileage</p> <p>Particulate emissions within LTNs will have dropped but their source had been diverted and added to areas where emissions and pedestrians are densest and now impacting greater numbers of people</p>	<p>by walking, wheeling, or cycling. For some journeys, the filters make driving more inconvenient and are in this way designed to encourage those who do not need to drive to choose a different way to travel, especially for short trips. Every journey switched from driving to active travel removes a car from the road and leaves the roads clearer for people who have no other choice but to drive.</p> <p>The council's pre-consultation monitoring data, (which can be found on our website Amwell people-friendly streets pre consultation monitoring report (islington.gov.uk)) shows that overall that traffic has not increased significantly on most boundary roads. The total increase in volume across three boundary road sites was 5%- a negligible increase. Included in this was a rise in traffic volumes on Farringdon Road (30% increase). However, it is considered that the traffic on Farringdon Road is not being "displaced" from internal roads but is originating as a result of other factors. This is likely to include some redistribution from the eastern boundary of the LTN (Amwell street and Claremont Square) which experienced decreases in traffic volume of 56% and 30% respectively. These results have not been included in the above overall figure as they are likely to have been impacted by unexpected unplanned works.</p> <p>The sites at which air quality was measured in Amwell are all, except for one site, located on boundary roads. The NO2 levels at all sites remained below 40µg/m3 (annual national targets) from the scheme becoming operational in November 2020 onwards. Air quality data from the Amwell area shows a slight increase in levels of nitrogen dioxide since the scheme started. These changes are slightly better than borough trends suggesting the trial has not had an adverse impact on air quality. It should be noted that air quality in 2020 was significantly lower than in 2019 across the borough and it is likely that when results are published for 2021 mid yeathat the air pollution across islington will be higher in2021 then 2020 but will still be consierably lower than 2019 when traffic was at pre-Covid levels.</p>
<p>Scheme is having a negative impact on mental health/wellbeing</p>	<p>Prior to implementation of each low-traffic neighborhood scheme, a Resident Impact Assessment (RIA) is carried out which aims to assess the impact of the scheme on residents who have protected characteristics (which includes people with disabilities). The RIA for Amwell lays out the potential positive and negative impacts on these cohorts. On the positive side, this included the potential for reduction of noise levels to aid those with cognitive disabilities.</p> <p>It is difficult to quantify the levels of increase of anxiety, stress and depression (and effects on wider mental health) and ascribe them purely to the impacts of the low traffic neighbourhood (LTN). As the implementation of the LTN occurred after the start</p>

	<p>of the Covid-19 pandemic, it would be difficult to separate the effects of one from the other.</p> <p>Between 8 March and 15 December 2021, we ran a trial feedback survey in Amwell, and between 15 December 2021 and 31 January 2022 we ran a consultation on the LTN trial. The trial feedback survey (260 respondents) showed, when asked to choose what they like about the trial, 16% responded that it 'makes the area more pleasant' while 17% commented on reduced air pollution and 19% noticed a positive difference in traffic reduction. The results from the consultation survey (440 respondents) showed that 43% of agreed 'the streets look nicer' since the trial began in 2020 while 34% stated they spend more time in the area and 43% said the air in Amwell is cleaner.</p>
<p>Scheme is poorly thought out/arbitrary/not evidence based</p> <p>There is a clear and distinct lack of thought and planning</p>	<p>In 2019, under the "liveable neighbourhoods" banner, the council committed to improve all residential areas in Islington to create a healthy, more equal, accessible and enjoyable environment, and to enable local people to walk and cycle safely. We set this out in our draft Islington Transport Strategy; our Air Quality Strategy; and our Net Zero Carbon Strategy, Vision 2030. Other examples include our ambitious School Streets programme, installing new electric vehicle charging points and electrifying the council's vehicle fleet.</p> <p>But the Covid-19 health emergency and changes to work and travel patterns have had a big impact on the way we use our streets. During the first lockdown in March and April 2020, Transport for London predicted that, without action, traffic volumes would get much worse than before the crisis. That's why we acted quickly to create more space for local people to walk, cycle, use buggies and wheelchairs as safe alternatives to using public transport. Private car use across London has increased as lockdown eases which is causing congestion, increased road danger, poorer air quality and other negative impacts on health. This is happening in all boroughs, whether or not they have implemented low traffic neighbourhoods (LTNs).</p> <p>The Islington Transport Strategy (ITS) (2020) contains a commitment to introduce a borough-wide programme of people-friendly streets including in eight named locations, one being Amwell, by early 2021. Moreover the ITS states that <i>it is planned that Low Traffic Neighbourhood schemes will eventually be rolled out to all parts of the Borough.</i></p> <p>Access to all addresses within the Amwell scheme has been maintained and there have been no significant issues with the functioning of the Amwell low traffic neighbourhood.</p>

<p>Cycle lanes in the LTN are unnecessary /underused</p>	<p>Safe streets to cycle on play a key role in empowering underrepresented groups to feel safe and confident cycling on London’s busy streets. Calmer streets with less vehicular traffic are a more appealing environment to less-confident cyclists.</p> <p>The Amwell LTN is not a cycle lane project, but aims instead to deliver a network of low traffic streets instead of segregated cycle lanes. Cycle lanes were not installed as part of the PFS programme in Amwell. However, located in the Amwell PFS area, the pre-existing Margery Street contraflow segregated cycle lane forms part of London’s Cycleway 27 (Formerly Quietway 2), a major cycleway which runs from Walthamstow (east) to Bloomsbury (west).</p> <p>Margery Street is a narrow street with one-way flow for westbound traffic which travels downhill. The cycle lane physically separates cyclists from motor traffic, enabling a safer and more comfortable environment for eastbound cyclists who have to travel uphill at this location. Therefore it still serves an important function despite the street having reduced traffic volumes as a result of the LTN.</p> <p>Monitoring data shows that cycling has increased since the Amwell LTN scheme’s traffic measures were put in place. Pre consultation monitoring data on cycle counts in the Amwell area showed across internal roads, cycling volumes increased by 65% overall. The greatest increase by volume was on Margery Street (westbound) with an increase of 196% (average 261 cyclists per day to an average of 771). NB, this number does not include the segregated cycle lane on Margery Street.</p>
<p>LTN exacerbates social equity issues- wealthy homes benefit from reduced pollution at the expense of other areas</p> <p>LTNs do not provide a reduction in car use or ownership or lower air pollution for the majority</p>	<p>Recent studies show that the LTNs installed in 2020-2021 do not benefit the better off over more disadvantaged communities. In fact, research has shown that across London, people in deprived areas were more likely to live in a new LTN than people in less deprived areas, and that Minority Ethnic people were slightly more likely to live in a new LTN than White people.</p> <p>LTNs are realising the benefits that investment in active transport and cycling can have in terms of improving accessibility and mobility, by breaking down physical and psychological barriers to walking and cycling, enabling people from more deprived backgrounds to better access jobs and services. Car ownership is highly correlated to income. The most recent UK data (from 2018) shows that in the top 40% of earners, more than 90% of households own one or more car. In the bottom 10% of earners, only 35% of households own one or more car. TfL data shows that over 70% of Islington households do not have access to a car, therefore by making it easier to travel by alternative means such as walking, cycling and public transport, we are likely to be</p>

	<p>benefitting a higher proportion of people who do not use motor vehicles.</p> <p>Although the cost of motoring over the past ten years has risen at a lower rate than the cost of living (and significantly lower than rises in public transport costs) it is estimated that owning and running a car in the UK costs around £3,900 per household annually.</p> <p>There are clear benefits to those who are economically disadvantaged if LTNs remove the perceived need for a motor vehicle, once less expensive options like walking and cycling become more attractive.</p>
Disadvantages elderly/disabled	<p>The council has carried out a Resident Impact Assessment (RIA) for the overall programme and for each individual scheme. This is sometimes referred to as an Equality Impact Assessment (EQIA). This assessment evaluates the impacts of the changes on people with different protected characteristics which includes age and people with disabilities.</p> <p>Anyone who can currently access their home by motor vehicle, private car or taxi will still be able to after the people-friendly streets neighbourhood is introduced. People who use walking aids, wheelchairs or mobility scooters will find the streets quieter, safer and more enjoyable with lower amounts of traffic, and fewer drivers using local roads for quick short-cuts.</p> <p>The council's people-friendly pavements programme will be introduced in 2022 and aims to improve conditions for anyone walking (or using mobility aids, including wheelchairs) on pavements. We will provide additional dropped kerbs to make crossing the road easier, improve foliage maintenance and ensure level surfaces are kept clear of unnecessary obstructions. People with visual impairments will benefit from reduced traffic and road danger, and the reduction in noise should help with navigating their local area more easily. It is also important to note that there are no plans to include any new "shared space" areas. Pavement space will be maintained for people walking or wheeling. The quieter and calmer streets should also make the streets more welcoming to people with cognitive disabilities.</p> <p>Compared to the London average, a higher proportion of people in Islington identify themselves as being disabled. Pedestrian enhancements could be of particular benefit to people with a disability in terms navigating an urban environment, including but not limited to those using walking aids, wheelchair or mobility scooter. In residential areas, those with cognitive disabilities could benefit from reduced levels of noise pollution, supported by the neighbourhood walking and cycling improvements and the</p>

	<p>removal of through traffic. Providing better conditions for cycling can empower more disabled people to cycle, particularly those with less balance who may want to choose adapted cycles away from traffic. All modal filters would be designed in a way that is inclusive and accessible to larger cycles such as tricycles and cargo cycles.</p> <p>In 2021 the council renewed its commitment to the people-friendly streets programme with an Executive decision - the report can be read here, in conjunction with the Resident Impact Assessment which can be read here. Those two reports set out what the exemption policy and the people-friendly pavements programme are and how they bring benefits to people who have protected characteristics, including the disabled. This includes the new exemption policy for Blue Badge holders which will allow people who live within a low traffic neighbourhood (LTN) to register a single vehicle which will be exempt from camera-enforced filters in that LTN. This will improve journey times for shorter, local journeys for Blue Badge holders in the Amwell area.</p> <p>The exemption will apply for a single LTN and will allow Blue Badge holders to register a single motor vehicle. Proof of address, car regist and Blue Badge status are likely to be the evidence required. On successful application, 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.</p>
<p>Residents should be granted ANPR exemptions/parking permit holder exemptions</p>	<p>The 2020 Executive Paper resident impact assessment (RIA) for people-friendly streets had identified a series of negative impacts for people who have a protected characteristic, 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. Based on this feedback and evidence, an exemption for Blue Badge holders was proposed in the October 2021 Executive Report, and this is being rolled out across the Islington LTNs</p> <p>The reasons for not providing exemptions to residents beyond Blue Badge holders are as follows:</p> <p>Access to all addresses within the LTN is maintained. The scheme has been designed so that all residents can access their homes without the need for an exemption. We know that it's vital that people who need to use their cars, such as Blue Badge holders, can access their home by car at all times. That's why in any of our people-friendly streets neighbourhoods across Islington, all residents are still able to drive to and from their</p>

	<p>homes, and people are still able to access shops and services in their area by car. The only thing that may change in some circumstances is the route they have to take.</p> <p>We need to create a safer environment for people to walk, use wheelchairs and cycle. If private vehicles in the area are still able to travel through the restrictions, then we will not see the benefits in terms of improved road safety, air quality and noise pollution that we would otherwise expect. This is because one of the main barriers that puts people off walking, using wheelchairs or cycling instead of driving is not feeling safe when sharing the road with the increasing volumes of traffic in the borough. By preventing all motor vehicle trips through camera-controlled filters (except for emergency vehicles and some council service vehicles and exemptions for Blue Badge holders living within the LTN) we will make the environment feel much safer, and make it much more likely that local people will begin to travel more by active means.</p> <p>We need to reduce congestion and air pollution on the main roads. The objective of the people-friendly streets programme is to reduce the overall number of trips, not to displace all traffic from local streets onto main roads. This will only happen if some car trips are replaced by walking, using wheelchairs or cycling. For some journeys the filters will make driving more inconvenient and are in this way designed to encourage those who don't need to drive to choose a different way to travel, especially for short trips. Every journey switched from driving to active travel (such as walking, using wheelchairs or cycling) removes a car from the road and leaves the roads clearer for people who have no other choice but to drive.</p> <p>Congestion has risen in Islington (and in London) because every day people make decisions to drive, thinking that is their easiest option. By introducing people-friendly streets, walking, using wheelchairs or cycling become a more convenient choice for people to make - safer, easier and quicker than driving. Every journey switched to active travel removes a car from the roads and leaves the roads clearer for people who may have no choice but to drive.</p>
<p>Increase of street clutter/visually unattractive filters</p>	<p>Traffic filters invariably need to make use of street furniture and signage in order to perform their function effectively and safely. Of the four traffic filters in the Amwell PFS area, three are non-physical barriers and only the Lloyd Square (northern side) filter is bollard enforced (with fixed and hinged bollards). At the southern side of Lloyd Square, bollards are used to narrow the roadway at the filter.</p> <p>Officers' recommendation on the Amwell PFS scheme has included amendments to the filters at Lloyd Square (north and south sides). The filter at Lloyd Square (north side) is to be</p>

	<p>changed from a bollard-enforced to a camera-enforced filter which will decrease the amount of street furniture in the area.</p> <p>Filters on both sides of Lloyd Square will have a 5 metre gap to facilitate exemptions for Blue Badge holders with a single bollard on either side. Solutions other than the single bollards such as planters or build-outs can be investigated in the next phase of the trial before a decision is made on whether to make the scheme permanent.</p> <p>The council's October 2021 Executive Report on the people-friendly streets programme outlines the forthcoming 'people-friendly pavements' programme which will become another key element of the PFS programme. This programme will make Islington's pavements more accessible through improvements such as:</p> <ul style="list-style-type: none"> • Footway repaving • Foliage maintenance • Additional dropped kerbs • Tactile paving • Street clutter removal
<p>Scheme drawings/plans are unclear</p>	<p>Ahead of the scheme being implemented, or changes made to the ETO including those in September 2021 leaflets were distributed to residents which included a map of the scheme, filter locations, and entry/exit points into the low-traffic neighbourhood.</p> <p>If residents did not feel as though the materials distributed provided clear explanations of the scheme, the leaflets also provided links to the council's website (islington.gov.uk/roads/peoplefriendlystreets) and contact information to the team's dedicated inbox (peoplefriendlystreets@islington.gov.uk) where correspondence was monitored and all emails aimed to be replied to within 10 working days by a people-friendly streets officer. The leaflet also provided advice for those who required the information in another reading format including braille, large print, audio or Easy Read to contact the council via telephone.</p>
<p>The scheme is unsafe for pedestrians</p>	<p>The Islington Transport Strategy has as its second objective to achieve "Vision Zero" by 2041 – the elimination of all deaths and serious injuries on Islington's streets. The PFS programme is intended to play a role in achieving this objective.</p> <p>The pre-consultation monitoring data for Amwell has shown that speeding and volume of traffic has fallen within the LTN area. Results from the consultation questionnaire show that 45% of respondents say it is easier to cross the street (17% disagree) and 42% say it is easier to make short trips by walking and cycling (17% disagree).</p>

	<p>In addition to traffic calming measures, the council's October 2021 Executive Report on the people-friendly streets programme outlines the forthcoming 'people-friendly pavements' programme which will become another key element of the PFS programme. This programme will make Islington's pavements more accessible through improvements such as:</p> <ul style="list-style-type: none"> • Footway repaving • Foliage maintenance • Additional dropped kerbs • Tactile paving • Street clutter removal
<p>Access for emergency vehicles is compromised</p>	<p>Resident safety remains a key priority for the council and is one of the key drivers for the programme.</p> <p>We have worked closely, and continue to work closely, with the emergency services before the installation of each LTN scheme to ensure they can access every street and ensure their crews are aware of the changes. We spoke to the London Fire Brigade (LFB), the London Ambulance Service (LAS) and the Metropolitan Police Service (MPS) about the changes we were planning and discussed how the changes and traffic filters might impact them. In some circumstances we adjust our plans on the basis of these discussions. We have shared, and will continue to share, our scheme plans with all emergency services so they can update their route-planning and mapping software. There will be an adjustment period as the services get used to the new routes, but we expect them to be fully embedded within a short time.</p> <p>To date, none of our monitoring reports showed any significant impacts on emergency service response times.</p> <p>Where there are physical barriers, like bollards, these can be unlocked by the London Fire Brigade, who carry keys. Only one filter in the Amwell scheme has been a physical filter (Lloyd Square north side) and an unrestricted route has been available via a very short diversion. (NB, This filter will be changed to be camera enforced as part of the continuation of the trial of the Amwell LTN). We will continue to monitor roads in and around each area during the next phase of the trials progress, and we can make changes if we think we can improve how a scheme works.</p> <p>Our people-friendly streets programme is designed to help residents to lead active and healthy lives, and the changes we are making should make it easier to move around the borough in ways which will also provide benefits to individual and public health.</p> <p><u>London Ambulance Service:</u> The Council is in conversation with the London Ambulance Service (LAS) about where it may be</p>

able to feed into future reports regarding traffic schemes within the Borough and LAS continues to monitor schemes and provide feedback to the council traffic officers should any delays occur to emergency responses. To date, LAS has not reported delays in response times as a result of the people-friendly street area being implemented in Amwell. We will continue to monitor this closely in the future.

Metropolitan Police Service: The council continues to engage and consult with the Metropolitan Police Service (MPS) as part of the implementation of its PFS programme. The following statement was provided by the MPS: 'Analysis of call data for the past 12 months, up to the end of July 2021, shows there has been no difference in average response times across the London Borough of Islington when compared to the previous 12 months (2019/2020) for both immediate and standard graded calls. There is no specific data available for low traffic neighbourhoods. Of note, over the past 12 months there has been a considerable reduction in call demand due to the effects of the coronavirus pandemic, c.2,800 fewer calls than the 12 months between August 2019 to end of July 2020 and a 19% reduction in offences. As we come out of the pandemic restrictions, we will continue to monitor call data to see if changes in road layouts across the borough affect our response times.' The MPS has not reported any issues regarding PFS schemes in Islington since issuing the statement.

London Fire Brigade: The London Fire Brigade (LFB) monitors the time it takes their vehicles to attend emergencies (attendance times). They are sharing data with the council to enable us to understand if the PFS schemes have adversely impacted attendance times.

The LFB use average attendance times to monitor attendance times. This is because there are a significant number of variables that can impact attendance times – for example, responding vehicles are not always setting off from the same place. As detailed in the London Safety Plan, "London Fire Brigade's intention is always to get to an emergency incident as quickly as possible on each and every occasion. But the Brigade also sets itself targets for the time it should take to arrive at an incident. The Brigade's London-wide attendance targets are: · To get the first fire engine to an incident within an average of six minutes. · To get the second fire engine to an incident within an average of eight minutes. To get a fire engine anywhere in London within 12 minutes on 95 per cent of occasions."

Data for Clerkenwell ward provided in the Amwell pre-consultation report shows that from November 2020 (when the Amwell scheme was implemented) to October 2021, the average attendance time for the first appliance remains well within the target time of six minutes and average attendance times for the

	<p>second appliance remains well within the target time of eight minutes. Given the extent of the variables that affect response times, the differences between the 2019 baseline and post-implementation period are considered insignificant by the LFB and the Council. As such, it is the view of the LFB that the PFS area in Amwell has not impacted this emergency service's attendance times.</p>
<p>Streets were not busy prior to the scheme/low rates of car ownership</p> <p>81% of Islington residents' trips are made by walking, cycling or using public transport and yet the Council is unfairly persecuting its residents</p>	<p>Prior to the Covid-19 pandemic, there was already a widely recognised need to reduce motor vehicle journeys as reflected in the draft Islington Transport Strategy (2019), the Mayor's Transport Strategy for London (2018) and Government policy. 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 (source: https://roadtraffic.dft.gov.uk/local-authorities/96). 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 (source: https://roadtraffic.dft.gov.uk/regions/6). 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 70% 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.</p> <p>On 15 May 2020, the Mayor of London and Transport for London (TfL) released details of TfL's emerging London Streetscape Plan. This Plan aims to give more space to pedestrians and cyclists. It concentrates on three key activities: a) the rapid provision of a temporary strategic cycling network; b) changes to town centres and transport hubs to give pedestrians (including those queuing outside of shops) and cyclists more space; and c) the accelerated delivery of Low Traffic Neighbourhoods within residential areas and School Streets schemes.</p> <p>The Streetspace plans came from a modelling assessment made by TfL during the first lockdown in March and April 2020. The assessment showed that without action, traffic volumes would get much worse than before the crisis. That's why we acted quickly to create more space for local people to walk, cycle, use buggies and wheelchairs as safe alternatives to using public transport. Private car use across London has increased as lockdown eases which is causing congestion, increased road danger, poorer air quality and other negative impacts on health.</p> <p>In common with other London boroughs, we must follow statutory government guidance which states that we need to take steps to encourage more walking and cycling and to enable social</p>

	<p>distancing. It is within that context that the PFS programme was first implemented.</p> <p>In 2021 the Department for Transport published a 'Gear Change – Year review' document highlighting the Transport changes, a year on from the pandemic, including the new and continuing commitments, which can be accessed here. This document provides evidence for an increase in private motorised vehicles after the pandemic which only solidifies the requirement for LTN's.</p> <p>The Islington Transport Strategy (ITS) (2020) contains a commitment to introduce a borough-wide programme of people-friendly streets including in eight named locations, one being Amwell, by early 2021. Moreover the ITS states that <i>it is planned that Low Traffic Neighbourhood schemes will eventually be rolled out to all parts of the Borough.</i></p> <p>Against this backdrop, neighbourhoods must be treated as a whole and considered in the context of borough-wide traffic trends.</p> <p>The implementation of traffic filters in areas surrounding Amwell as the programme expands across the borough could encourage through traffic to increase the use of local streets in the Amwell neighbourhood. The increasing use of apps and sat-navs and the return of motor traffic as the country has emerged out of lockdown could quickly turn a quiet street into a busy cut-through. The Amwell scheme's filters aim to prevent this from occurring as the programme expands across the borough.</p>
<p>Businesses negatively impacted</p>	<p>Access to business addresses by motor vehicle has been maintained with the Amwell LTN measures in place, albeit that the routes may have changed.</p> <p>As part of the consultation process, businesses within the LTN and on boundary roads were visited to encourage owners to fill in the consultation questionnaire on behalf of their business. Businesses were asked to outline any positive or negative impacts the scheme was having on their operations. Key themes from in-person business consultation included a lack of awareness that the trial was taking place, and that congestion charging and the ULEZ already made driving an expensive option. Some businesses on Amwell Street were concerned that the traffic filters would make deliveries take longer to reach them.</p> <p>16 respondents (4%) filled in the consultation questionnaire on behalf of a business. 9 of these businesses operated within the PFS area or on a neighbourhood street. When asked what measures could be taken to improve their business operations, the most common answer was 'other' which included free text responses about taxi access, or improved client access to</p>

	<p>business. Other answers included support for more public seating, greener vehicles or more cycle parking space for customers.</p> <p>Many items to and from businesses could be delivered by cycle or cargo bike, and these vehicles are able to pass through any traffic filters that are installed as part of the Islington PFS programme. As well as being quicker for local trips, using cycles would also mean no extra costs to your business (like VED, fuel or insurance). Islington Council’s Inclusive Economy team is working closely with the people-friendly streets team to support Islington’s businesses make green transitions.</p> <p>An independent UK study makes an economic case for investing in streets that are more pedestrian friendly. Shoppers on foot were found to spend six times more than those who arrived in cars while overall retail footfall and trading increased when investments were made in walkability.</p> <p>TfL research also found that in “high streets and local town centres walking and cycling improvements can increase retail spend by up to 30%”.</p>
<p>Parking bay suspensions should be reversed</p>	<p>As part of the Amwell low traffic neighbourhood trial, five parking spaces were suspended on Great Percy Street and nine parking spaces were suspended on Lloyd Square.</p> <p>These parking bay suspensions were required to implement the traffic filters as well as to allow turning space for vehicles. Suspension of the bays also created more road space for active travel including walking, cycling and wheeling.</p>
<p>Taxis should be exempt including access through bus gates</p>	<p>The Council’s position on bus gates has been clearly set out. Our use of bus gate signage precludes all motor vehicles except emergency vehicles and buses from passing through camera-controlled filters where these signs are used.</p> <p>With reference to the Mayor’s Transport Strategy of 2018, we note that a clear distinction is made between “public transport” and taxis. There are 345 mentions of "public transport" in the Mayor's Transport Strategy and none of those references include taxis in the definition. In fact, many definitions explicitly exclude taxis, and contrast them to public transport.</p> <p>The installation of our people-friendly streets programme involves Islington Council making legally enforceable experimental traffic orders, which comply with all relevant traffic regulations. The purpose of these experimental traffic orders is to significantly reduce traffic flow on local streets, preventing motor traffic from taking short cuts between main roads via local streets. At the same time we wish to allow the drivers of motor vehicles to continue to be able to access all addresses they can currently reach.</p>

	<p>The experimental traffic orders therefore do not provide exemptions for any motor vehicles to pass through the filters, except for emergency vehicle access, Blue Badge holders living within the LTN where we have introduced this policy, and where the filter is placed on a bus route. Buses have a fixed route and a fixed timetable, so do not have any other options than to use the route with a filter installed. Taxis, PHVs and private cars do have other options for any journey they take.</p> <p>The council are not preventing access to any address and so taxi drivers (indeed, all drivers) can still use the shortest legal route between two points.</p> <p>Furthermore, the Taxicard scheme allows people with disabilities and mobility impairments to use taxis at subsidised rates, as identified in our Resident Impact Assessment before installing the new people-friendly streets measures.</p>
<p>Commonplace was not well advertised/anyone can comment on it (I.e. non Islington residents)</p>	<p>This response addresses two separate objections about the Commonplace survey. The first is that the Commonplace feedback platform was not well advertised. Since the early stages of the 2020 COVID lockdown, residents from Islington’s local communities and other stakeholders had the opportunity to suggest ways the council could help them to walk and cycle more safely and easily using the council’s online engagement tool, Commonplace. This was set up on 29 May 2020 to enable residents and others to indicate locations and measures for the people-friendly streets programme to respond to the challenges that the Covid-19 pandemic posed.</p> <p>The Commonplace tool closed for comments in March 2021, but the comments made are taken into consideration as part of the development of PFS schemes and can still be viewed on the website at https://islingtonpeoplefriendlystreets.commonplace</p> <p>The second objection is that Commonplace is not fit for purpose because anyone nationally can register. The majority (66%) of respondents self-reported as living in the Amwell area with 20% working in the area and an additional 9% living nearby. Multiple options could be selected by the same respondent so percentages do not sum up to 100%.</p>
<p>Poor/confusing signage</p>	<p>It is considered that the Amwell LTN makes use of suitable signage as prescribed by the Traffic Signs Regulations and directed by the Traffic Signs Manual.</p> <p>Some changes to signage have been implemented since the outset of the scheme.</p>

<p>Section 122 of the RTRA 1984 refers to the duty of local authorities “to secure the expeditious, convenient and safe movement of vehicular and other traffic” which the LTN scheme fails to provide and the Authority are therefore failing in its duty of care.</p>	<p>Section 9 of the Road Traffic Regulation Act 1984 enables the council to make experimental traffic orders (ETOs) to deliver our people-friendly streets schemes. A separate ETO is drawn up for each low traffic neighbourhood. In deciding whether to make an order under section 9, the council must comply with the provisions of section 122 of the 1984 Act which requires the council to exercise that function (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:</p> <ul style="list-style-type: none"> (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, 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. <p>The council has complied with section 122, balanced the various considerations and concluded that implementing the ETO is the appropriate decision. Further, when deciding whether to make a traffic order the council must have regard to the Mayor of London’s Transport Strategy (sections 142 and 144(1)(a) Greater London Authority Act 1999) and it has done so. That strategy emphasises the importance of reducing emissions and improving air quality.</p> <p>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 the start of the trial. In making the ETO, the council must follow the procedure set out in the Local Authorities’ Traffic Orders (Procedure) (England and Wales) Regulations 1996 (as amended by the Traffic Orders Procedure (Coronavirus) (Amendment) (England) Regulations 2020). It has followed this procedure, including consultation of relevant bodies. The council has also considered the application of relevant provisions of the Human Rights Act 1998 and the Equality Act 2010. It is not considered that the implementation of these ETOs will impede the rights of individuals.</p>
<p>Petition signed by over 7,000 people opposing the LTNs has been disregarded</p>	<p>Islington has a population of over 200,000 residents and Islington’s streets belong to everyone. They are a place where life happens and where the community comes together, no matter what our individual circumstances or daily routines look like. But as technology has changed, including the development of sat-</p>

Local councillors are responsible for ensuring that local decisions about street infrastructure take account of the needs and opinions of local people

Valid concerns put forward by resident representatives to the Council Leader have not been addressed and have been dismissed

navs, we've seen more and more traffic taking short cuts through local streets.

The council has a policy for responding to petitions which can be found here:

<https://democracy.islington.gov.uk/mgEPetitionListDisplay.aspx?bc=1>. This policy applies to petitions submitted directly to the council. According to our records, the following petitions have been submitted to the council regarding the people-friendly streets programme:

- One with 2,406 signatures discussed at the 25 February 2021 full council. Item 130 here <https://democracy.islington.gov.uk/ieListDocuments.aspx?CIId=134&MIId=4060>
- One e-petition with 17 signatures, here: <https://democracy.islington.gov.uk/mgEPetitionDisplay.aspx?ID=500000045&RPID=391926&HPID=391926>
- A petition in **support** of a Highbury LTN, presented to the 9 July 2020 Council meeting, with 1,188 signatures - https://www.change.org/p/islington-london-borough-council-highbury-low-traffic-neighbourhood?recruiter=1115898960&utm_source=share_petition&utm_medium=twitter&recruited_by_id=032af7a0-acbf-11ea-9892-d17f3fd28fb9

The council has no record of a petition with 7,000+ signatures being submitted. Petitions on independent private sites that are not linked to the Islington route for considering petitions are not considered, additionally there are not any checks on who signed the petition.

A petition was brought to the full council meeting on 9 December 2021. A stream of this meeting is available here:

https://islington.public-i.tv/core/portal/webcast_interactive/619236. Minutes for this meeting can be found on the [council's website](#).

Petitions may circulate on social media and independent websites, but the council has no way of verifying the signatories to these petitions. Other London boroughs have used online petitions to justify removing schemes, only to discover later that these petitions have been shared not just nationally, but globally:

<https://www.standard.co.uk/news/transport/kensington-cycle-lane-axed-refund-government-cash-b115087.html>

After debate in council chambers on 25 February 2022 on the petition 'Reverse the Road Closures' 130 the following main points were raised in the debate:

- The petitioners said that congestion had increased on the borough's main roads following the introduction of the council's People Friendly Streets scheme. The petitioners considered that there had been inadequate consultation on the schemes prior to implementation.
- Councillor Champion commented that the administration was elected on a manifesto to make streets more liveable, including reducing rat-running and increasing cycling. Traffic on London's local streets had increased by 72% over the past 13 years. This volume of traffic was dangerous and discouraged people from choosing active travel options. The Council's scheme would encourage residents to lead active lives that would be beneficial to their health and wellbeing, while also helping to tackle the climate emergency.
- London's traffic was a major source of air pollution that was having a detrimental impact on the health and wellbeing of local people and the environment. The People Friendly Street scheme would help to address this.
- The Council's People Friendly Streets scheme was the implementation of national government policy which required local authorities to reallocate road space for cyclists and pedestrians in response to the coronavirus pandemic. The schemes had been implemented through national government funding made available for this purpose and was compliant with statutory guidance.
- Councillors were listening to the feedback received on the schemes and this would be taken into account when the schemes were reviewed.
- Councillors considered further improvements that could be made to reduce car usage and improve access to public transport and how active travel options could be further promoted.

RESOLVED: To continue to encourage residents to participate in local democracy by carefully considering the concerns raised in the petition and to undertake the debate in a spirit of openness and transparency.

Local councillors have been listening to local people. Many local people tell us that they want their streets to be friendlier places that are easier for everyone to use; to enjoy being outside in clean air; to make it safer for walking, cycling, using buggies and wheelchairs; to relax or play. Over [70% of households](#) in Islington do not own a car (see appendix 7 in link) and [1/3 of journeys](#) in London are less than 2km, a distance which could be walked or cycled by many people – especially if the roads were quieter.

<p>Islington have implemented the most Safe School Streets</p>	<p>There are no school streets in the Amwell PFS, however the temporarily closing of roads outside schools helps to reduce congestion and pollution at the school gates as well as make it easier and safer for children to get to and from school. In addition to the immediate benefits for school children, the School Street zones also provide a temporary pedestrian and cyclist zone for wider community to enjoy. This means that people travelling through the area to their homes, work or place of education can benefit from safer, greener and healthier travel through the School Street zone.</p> <p>School street restrictions operate at school pick-up and drop-off times, typically for an hour in the morning and afternoon, and are located on streets immediately around the entrances to schools. This delivers important benefits for school pupils in reducing road danger and improving air quality outside schools. Low traffic neighbourhood measures deliver benefits to a wider area neighbourhood area by preventing through-traffic from cutting the area. Both are beneficial in different and complementary ways.</p>
<p>The aim to reduce pollution and to create "vibrant safe and friendly neighbourhoods" with pedestrians, cyclists and children playing in the streets has not been achieved, in fact these streets have become deserted and unsafe</p>	<p>From September 2019 to September 2021 antisocial behaviour (ASB) and crime rates in Amwell showed similar trends to that of Islington as a whole. Across various analyses of the volume of ASB calls and reported crimes in Amwell and Islington, the monthly volume of calls and crimes as a proportion of the total over the year remained consistent between Amwell and Islington.</p> <p>There is no evidence so far that the Amwell PFS scheme has had an impact on crime and ASB – as confirmed by the Metropolitan Police and the council's Community Safety Team.</p> <p>While crime and ASB data remain consistent, there has been a significant rise in cycling in the Amwell PFS area. On internal roads, cycling has increased by 65% overall with an increase of 196% on Margery Street. People driving in vehicles would be moving faster through the area and may be less observant of people walking, so could be less likely to stop. Walking levels were not monitored, but if these have followed cycling levels then there would be an increased presence of people on the streets, increasing passive surveillance.</p> <p>The council has not been able to find evidence that a higher presence of motor vehicles in an area reduces crime rates (discounting offences 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</p>

	<p>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 Amwell consultation survey results show that 36% of all respondents said they felt more safe using the street at night and 42% who said they felt more safe using the street during the day. 27% and 20% said they felt less safe at night, and during the day. Among respondents whose households do not have access to a car or van, the survey showed that 64% felt more safe using the street at night and 72% felt more safe using the street during the day (comparative figures for respondents from households with access to a car or van are 17% and 22%, respectively).</p>
<p>LTNs are not delivering the benefits envisaged</p>	<p>The interim (6 month) and pre consultation (12 month) reports show that the Amwell people-friendly streets trial is generally having the intended impacts of reducing motorised traffic overall across internal roads and increasing levels of cycling on internal roads, including significantly on Margery Street (with flow – westbound) which is part of Cycleway 27. There has been negligible change in crime and antisocial behaviour patterns and fire brigade response times in the area. In terms of air quality, there has been a slight increase in NO2 levels, but this is slightly better than borough trends.</p> <p>The pre consultation monitoring report shows that there have been increases in traffic on some internal roads (Prideaux Place and Wharton Street) as well as on one boundary road (Farringdon Road) however these may be accounted for by other factors including changes in the wider area and the unauthorised removal of a bollard at one of the traffic filters.</p>