

Appendix 11 – Officer response to objections

Theme/Topic of Objection	Officers Response
<p>Increase in traffic/pollution on main roads / increase in pollution (cars forced to take a longer journey on congested main roads)</p> <p>Concern about impact on buses e.g. increased journey time</p>	<p><u>Increase in Traffic</u> Traffic data collected for the Highbury pre-consultation monitoring report (December 2021) shows that total vehicle flows on boundary roads in Highbury have remained broadly similar to those recorded before the scheme began, although with some variation between sites. Traffic volumes at the northern end of Blackstock Road increased by 58%, and volumes at the western end of St Paul’s Road increased by 15%. Traffic volumes on Holloway Road showed no/negligible change. Volumes decreased on Hornsey Road (28%), Highbury Grove (18%) and Seven Sisters Road (18%).</p> <p><u>Increase in Pollution</u> Pre-consultation monitoring data shows that the changes in levels of nitrogen dioxide reflect those in the borough more widely. Although levels of NO2 measured on Highbury boundary roads since the scheme began are higher than the previous year (February-October 2020) these changes are similar to those in the borough more widely and are lower in all locations in 2021 than they were in 2019, including on the boundry roads</p> <p><u>Longer Journey Times</u> The council’s analysis of the impact of the Highbury 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 (November 2020) are compared against post-implementation travel times (December 2021).</p> <p>On Highbury Grove, journey times have decreased for all travel and journeys during the AM peak were on average 23 seconds faster in December 2021 than November 2020.</p> <p>Journey times on Highbury Park and Blackstock Road have increased in both directions, particularly north bound during the PM peak when they increased by 17% (50 seconds). This increase may be related to a larger number of vehicles trying to navigate the junction with Seven Sisters Road or other maintenance activities in the area.</p>

	<p>Journey times on Seven Sisters Road have increased in both directions (33% in the AM peak, 36% in the PM peak) however this may be the result of construction on Seven Sisters Road caused by Thames Water works which required closing one lane of traffic in each direction on Seven Sisters Road.</p> <p>On Iseldon Road journey times also increased by 39% (18 seconds). As with Seven Sisters Road there were lane closures during this time due to Thames Water works.</p> <p>At Holloway Road southbound journeys increased during the PM peak. Northbound journey times saw little change during PM peak, and decreased during the AM peak. Given these directional differences, increased journey times were likely due to congestion at Highbury corner.</p> <p>On St. Paul's road, journey times increased Westbound (from Essex Road junction to Highbury Corner) by approximately 90 seconds during both the AM and PM peak. It may be that increases are due to a number of factors including a variation in junction timings and an increase in traffic following the lifting of all COVID restrictions. Journey times eastbound have remain unchanged.</p> <p>While the schemes become established there may be some periods in the day where queues form, but as people get used to the changes many will be able to make different travel choices. Evidence from our own monitoring reports and similar projects in London suggests that traffic on the main roads spreads out across the day, bus journey times are not significantly increased and air quality on main roads does not get worse.</p>
No consultation or due notice	<p>The provisions of the ETO process do not require public consultation prior to the start of the trial, although the council did engage with the public before the start of the trial through the use of commonplace on the wider people-friendly streets programme and consultation on key strategic documents as outlined above.</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</p>

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.

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.

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:

- (a) the desirability of securing and maintaining reasonable access to premises;
- (b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
- (bb) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);
- (c) the importance of facilitating the passage of public service vehicles and of securing the safety and

	<p>convenience of persons using or desiring to use such vehicles; and (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>It should also be noted that since implementation there has been a number of opportunities for the public provide feedback on the scheme including through objections, trial feedback survey responses, consultation responses and emails sent to the council. All of the feedback received so far has been given due consideration in the making of this decision.</p>
<p>Poor effect on businesses, less passing trade</p>	<p>Access to business addresses by motor vehicle has been maintained with the Highbury LTN measures in place, but some access 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: concern about receiving deliveries, concern of loss of business from decreased car traffic/loss of parking spaces and lack of prior consultation/engagement.</p> <p>Many items being distributed 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 businesses (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.</p>

	<p>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>Note that, the feedback received from businesses throughout the trial has been summarised and responded to in depth in Appendix 4 and mitigating actions have been outlined.</p>
<p>Islington Council are not representing all of their residents, including, the elderly, those with young children, those with disabled children and disabled people, not just the able bodied</p> <p>Negative effect on vulnerable/disabled, less independence</p>	<p>There are many visible and less visible impacts of traffic on the health and quality of life which often harm the most vulnerable residents: motor traffic can be dangerous, noisy, polluting and can discourage community interaction and healthy activity including walking, wheeling, cycling and play. Implementing low traffic neighbourhoods can bring widespread benefits to society as a whole by making places safer, healthier and more attractive. LTNs help improve access to walking and cycling, particularly for children, older people and people with disabilities.</p> <p>Following engagement with individuals with disabilities and groups representing individuals with mobility restrictions, the council has introduced exemptions for Blue Badge holders from designated camera-enforced filters within their home LTN, for a vehicle registered to their address. This decision report will further expand the Blue Badge exemptions in the Highbury area by combining the LTN into one blue badge exemption area rather than two separate areas.</p> <p>81% of Londoners are able to ride a bicycle, including 76% of disabled people. 75% of disabled cyclists find cycling easier than walking. 17% of disabled Londoners ‘sometimes’ use a cycle to get around London, compared to 18% for non-disabled Londoners (source)</p> <p>A survey by Wheels for Wellbeing found that inaccessible cycle infrastructure was cited as the biggest barrier to cycling. Disabled people are five times more likely to be injured as a pedestrian than non-disabled people. The council is committed to campaigning to improve the accessibility of public transport.</p> <p>Research by TfL shows modes of transport used at least once a week for disabled Londoners as:</p>

	<ul style="list-style-type: none"> • Walking (81%) • Bus (58%) • Car as passenger (42%) • Car as driver (24%) source <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>LTN worsens air quality</p>	<p>Both the six-month and 12-month reports on the Highbury neighbourhoods compare updated air quality readings to baseline readings from 2020, where the Covid-19 lockdowns contributed to a fall in pollution. Where the council has air quality data available from 2019, before the Covid-19 pandemic, both the six-month and 12-month monitoring reports show an improvement in air quality at all sites, including on boundary roads. The council is therefore confident that the Highbury West and Highbury Fields neighbourhoods are not having an adverse effect on air quality.</p>
<p>Allow for wider exemptions</p>	<p>In December 2021 an exemption for Blue Badge holders to drive through camera enforced filters in their 'home' LTN was introduced, with all eligible holders in Highbury automatically receiving the exemption. An 'Exceptional Circumstances Dispensation' policy for those who do not meet the current criteria is in development and will be in place later in 2022.</p> <p>There are to be no exemptions for individuals beyond Blue Badge holders. The scheme has been designed so all residents can access their homes without the need for an exemption. In any of our people-friendly streets neighbourhoods across Islington, all residents are able to drive to and from their homes and 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>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</p>

	<p>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) 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>The objective of the people-friendly streets programme is to reduce the overall number of trips. 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. TfL data shows that a 1/3rd of all car journeys made in London are less than 2km. 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>The council has given due consideration and consideration to expanding exemptions to people beyond Blue Badge holders (for example people who live within the Highbury area) but for the above reasons has taken a view not to expand the exemptions.</p>
<p>Concern about effect on emergency Services</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>

Where there are physical barriers, like bollards, these can be unlocked by the London Fire Brigade, who carry keys. 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.

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.

London Ambulance Service: The Council is in conversation with the London Ambulance Service (LAS) about where it may be 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.

As of 5 January 2022, there had been one reported incident of LAS crews having to navigate around the Ambler Road and Plimsoll Road area on 31 January 2021, however the report did not detail this causing a delayed response.

Through engagement between LAS and Islington Council, the Council have implemented changes to increase the permeability of the scheme to ensure better access to emergency vehicles in Islington and 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. Analysis of call data relating to the London Borough of Islington for the past 12 months, up to the end of November 2021, shows there has been no significant difference in average response times across the borough for immediate graded calls, meaning the MPS continue to attend the most urgent calls as quickly and safely as possible. However, there has been a 5.7% decrease in the number of standard graded calls (attendance within the hour where there is no need to use emergency warning equipment to progress through traffic) attended within the target time. There is no specific data available for low traffic neighbourhoods.

	<p>When considering these figures, it should be noted that over the past 12 months there has been a reduction in call demand across the command due to the effects of the coronavirus pandemic, c.1,500 fewer calls than the 12 months between November 2019 to end of November 2020 and a 19.3% reduction in offences</p> <p>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.</p> <p>Data from Highbury Ward provided in the Highbury pre-consultation report shows that the average London Fire Brigade attendance times for first and second appliances remains within target times of six and eight minutes, respectively.</p>
<p>Creating an increase of anxiety, stress and depression levels- affect on mental health</p> <p>Disturbance from traffic increase (affecting quality of life)</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 Highbury 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 of the Covid-19 pandemic, it would be difficult to separate the effects of one from the other.</p> <p>Between November 2020 and February 2022, a trial feedback survey was available for Highbury West and Highbury Fields, and a consultation questionnaire was available between 7 February and 14 March 2022. The trial feedback survey for Highbury Fields (1704 respondents) showed, when asked to choose what they like about the trial, 19% responded that it 'makes the area more pleasant' while 22% commented on a reduction in air pollution and 21% on a reduction in through traffic. The results from the consultation survey (1938 respondents) showed that 33% noticed 'less noise from motor traffic' while 34% agreed 'the streets look nice' and 27% reported doing more physical</p>

	<p>activity outdoors. In Highbury West, the trial feedback survey (2771 respondents) said they liked that the trial reduced through traffic (25%), reduces air pollution (22%) and makes it safer to cross the road (18%). The Highbury West consultation survey (1973 respondents) showed that 38% of respondents agreed 'the streets look nice' and 37% agreed 'the air is clean.'</p>
<p>Highbury Corner causing congestion in the area</p> <p>Impact of the LTN on Highbury Corner</p>	<p>The council continues to work closely with TfL to explore options to improve the operation of Highbury Corner. In August 2021, the traffic signals at Highbury Corner were reviewed and changed to improve traffic operation through the junction. New stages in the signals were introduced to improve the clearing of traffic from inside Highbury Corner to reduce exit blocking. The council will continue to liaise with TfL on their review and findings and explore other opportunities to improve the operation of Highbury Corner.</p> <p>The council is exploring options for improving the operation of the Highbury Grove and St Paul's Road junction. This piece of work is focusing on improving the operation of the junction, improving the movement of traffic along St Paul's Road and Highbury Grove and on what can be done to improve the safety of the junction for pedestrians and cyclists. As part of this opportunities for improving bus journey times are also being explored. The council is in the process of working with TfL to look at signal timings at this junction, and this is being reviewed in the context of Highbury Corner.</p>
<p>Scheme not thought through/justifiable</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</p>

	<p>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 Highbury Fields, 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>Our neighbouring boroughs may have similar plans for their streets, which might result in a safer walking or cycling route for a greater number of local destinations. As a local authority we are following national government guidance which all local authorities need to take note of including policies around road user hierarchy, cycling infrastructure design and transport management regulations.</p>
<p>Unsafe for women travelling alone, forced to use public transport, walk on quieter streets and cabs cant drop to your door</p> <p>Poor safety in the area</p> <p>Scheme increases/encourages crime</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 after the implementation of LTNs in Waltham Forest, based on police data.</p> <p>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 pre-consultation monitoring report includes analysis of volumes of crime and ASB and found that during the trial period the Highbury PFS area showed similar trends to those of Islington as a whole. Overall, the council’s community safety team found no evidence to suggest that the rate of crime and antisocial behaviour increased following the implementation of the Highbury LTN area.</p>

	<p>It is however noted that a significant proportion of responses to the consultation survey indicated that people felt less safe traveling at night. While this may not be correlated with an actual increase of crime or antisocial behaviour, the council recognizes the need to continue to engage with the public and implement supplementary measures to ensure that people feel safe on Islington streets regardless of the level of motor traffic on that street.</p>
<p>Changes need to fully take account of the needs and opinions of local people</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-navs, we've seen more and more traffic taking short cuts through local streets.</p> <p>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> <p>As part of this decision the council has given extensive and due consideration to all the feedback provided by people on the operation of the low traffic neighbourhood. This feedback has led to a better decision which includes the provision of key changes to the scheme to ensure it works better for local people.</p>
<p>Concerns for cyclist safety</p>	<p>Cycling is a sustainable, efficient and active method of transport for those who are able to do so, and the Council wishes to improve the borough's road network to enable more people to take up cycling by providing more cycling facilities and reducing motor traffic on certain streets. This will reduce congestion for those who have no other option but to use their cars, and will also deliver significant public health benefits related to increased physical activity and reduced emissions</p> <p>Many surveys show that the main barrier preventing people from cycling on the roads is the perception that sharing the road with motor vehicles is too dangerous, so by reducing motor vehicle traffic on local streets we should encourage cyclists onto the roads and away from areas used by pedestrians</p>

<p>Increase in traffic on remaining unfiltered, small, residential roads</p>	<p>Ambler Road was previously identified as a potential short-cut route, but it was considered that under normal circumstances it would offer a negligible time saving advantage to drivers and thus it was not filtered as part of the trial.</p> <p>Shortly after the Highbury West trial scheme went live in January 2021, several reports were received from residents stating that an increasing number of vehicles were using Ambler Road as a short-cut to avoid congestion on Blackstock Road. In response, the council commissioned a series of automatic traffic counts (ATC) which took place over a three-week period between 1 – 21 March 2021, at Blackstock Road (North), Ambler Road, Prah Road and St Thomas’s Road. These were designed to understand the extent of the issue and identify whether it was persistent or largely due to motorists attempting to avoid congestion caused by Thames Water works that were being carried out on Seven Sisters Road at the time. These works comprised the relining of a water main, which is a significant and complex task that is rarely carried out</p> <p>The Ambler Road counts were compared against baseline counts that took place in December 2020 and interim counts that were carried out in May 2021. Normalised motor volumes on Ambler Road were largely unchanged between March 2021 and December 2021, with the other three monitored sites seeing decrease in traffic flow over the same period. This suggests that the short-cut route being used was primarily a result of the water main replacement works that were carried out in early 2021 and further disruptive works that took place in March 2022. The council will continue to monitor the site and may consult on mitigation measures near Ambler Road in the future.</p>
<p>Concern over how government funding is being used</p>	<p>The LTNs budget for 2021/22-2023/24 includes funding from a number of sources including Section 106, Transport for London, and Lorry Control. The Council has also submitted bids to central government (the Department for Transport) for funding for these schemes.</p> <p>Funding is explicitly allocated to Active Travel initiatives including LTNs, which are strongly supported by national government. In November 2020’s Spending Review, the Department for Transport announced £257 million to spend on cycling and walking for the 2021-22 financial year, bringing total Active Travel spend to</p>

	<p>£438m including £100m for London as outlined in a December 2021 TfL settlement deal.</p> <p>The DfT has stated that funding will be reduced to councils that do not take active travel seriously, including removing schemes prematurely or never installing them in the first place. An authority's performance on active travel will help determine the wider funding allocation it receives, not just on active travel (source).</p>
<p>Dangerous cyclists</p>	<p>All road users, including cyclists, must always obey the Highway Code. Islington Council offers free cycle skills training for adults and children to enable people to cycle more confidently and safely on the road. You can find out more about what is on offer here.</p> <p>Cyclists are permitted to use the whole carriageway. A solid white line along a cycle line indicates a mandatory cycle lane, which drivers are not permitted to enter. It does not mean that cyclists have to stay within the lane. Cyclists may choose to use the whole carriageway for a variety of reasons, including avoiding potholes and broken glass, avoiding riding too close to the 'door zone' near parked cars, or preparing to make a right turn.</p>
<p>Cycle lanes not occupied</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 Highbury LTN is not a cycle 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 Highbury, however part of permanent Cycleway 38 runs through the Highbury Fields and West LTNs.</p> <p>Data from the Highbury pre-consultation monitoring report shows that cycling has increased on some of the internal roads, where monitored. The greatest increase in cycling trips was at Horsell Road, from 548 to 819 trips a day, an increase of 49%. It is also important to note that government regulations and guidance surrounding COVID 19 has significantly impacted wider cycling trends since March 2020. DfT data from December 2020 and December 2021 shows cycle flows of about 20% lower than in December 2019.</p>

	<p>Cycle route choices will also be impacted by the availability of nearby protected cycle infrastructure including the recently constructed Cycleway 38.</p>
<p>Islington already has one of the lowest pollution and car ownership levels</p> <p>Many trips in Islington are already 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 distancing. It is within that context that the PFS programme was first implemented.</p>
<p>LTNs are not delivering the benefits envisaged</p>	<p>Results from the pre-consultation monitoring report shows that, in general, the Highbury people-friendly street (PFS) trials are having the intended impacts in the area – in terms of reducing motorised traffic across internal roads, thereby making the area’s roads greener, cleaner and healthier for residents. There have been no clear adverse impacts on anti-social behaviour levels or emergency service response times. The trial has also shown no scheme-specific impacts on air quality to date, as nitrogen dioxide has not increased outside of wider Borough trends.</p> <p>While the consultation results are mixed with regards to feedback there is evidence that for many of the respondents the schemes are having the desired impact further contributing to the monitoring results.</p>
<p>LTNs do not provide a reduction in car use or ownership or lower air pollution for the majority</p>	<p>Residents across the borough (including the nearly 70% of households who do not own a car) are negatively affected by poor air quality. As the extract from the Air Quality Strategy above makes clear, roughly half of the emissions causing this poor air quality come from road transport and from people who choose to drive in the borough. The installation of people-friendly streets schemes to enable and encourage a shift from polluting to non-polluting modes of transport has to be a necessary part of making improvements in this area.</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.</p> <p>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</p>

	<p>public transport, we are likely to be benefitting a higher proportion of people who do not use motor vehicles.</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. 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>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,</p>

	<p>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>Concern over impact of LTNs on Arsenal game days</p>	<p>It is important that the people-friendly streets neighbourhood trials for Highbury West and Highbury Fields accommodate regular match day arrangements. This is because the match day arrangements form part of the agreement with the emergency services and the Club for the safe operation of events at the Emirates Stadium.</p> <p>The Highbury West and Highbury Fields people-friendly streets trial schemes will not prevent residents from driving to and from their homes if they currently can when Arsenal's Match Day Restrictions are brought into effect.</p> <p>To ensure residents can access their roads on match days, the traffic filters at Aubert Park and Highbury Place/Calabria Road are suspended when the Match Day restrictions are in place. Enforcement signage at the suspended traffic filters is covered during the temporary suspension and removed once the road restrictions are lifted post-match.</p> <p>The traffic filter suspension timings will vary in line with the timings of each home game at the Emirates Stadium, so precise timings for the suspensions of filters on each match day cannot be provided. Generally the suspensions will begin two hours before kick-off and end approximately two hours after the final whistle.</p> <ul style="list-style-type: none"> • The suspension of the Aubert Park no entry point allows residents living on Stavordale Road, Martineau Road, and Highbury Hill (between the junctions of Martineau Road and Aubert Park) access their roads when Drayton Park is closed to motor traffic. • The suspension of the Highbury Place/Calabria Road no entry point allows residents living in the Highbury Fields people-friendly streets area an alternative route along Baalbec Road. This is because the temporary closure of Drayton Park on match days will prevent residents from using the new access route leading to Fieldway Crescent via Horsell Road.

	<ul style="list-style-type: none"> The road closure point currently located at the junction of Ronalds Road and Horsell Road which was removed as part of the people-friendly streets neighbourhood trial, is temporarily reinstated on match days and operated by stewards. This means that access arrangements for residents of Witherington Road, and sections of Arvon Road, Ronalds Road and Horsell Road, remain as they are now on match days. <p>Residents may want to subscribe to Arsenal’s match day update distribution list to stay informed about future match day fixtures, road closures and traffic information www.arsenal.com/the-club/local-residents-news.</p> <p>The council is also making further changes to the signage in the low traffic neighbourhood to ensure that the filters can be effectively suspended through folding signage.</p>
Request for information or clarification	<p>When a written objection contained a request for further clarification around the details of the Highbury Fields or Highbury West low-traffic neighbourhoods, people-friendly streets officers would aim to respond to the objection within 10 working days.</p> <p>The public have a general right of access to the information held by the council and the council must release information on request, unless a relevant exemption applies. The people-friendly streets team adheres to Islington’s commitments to promoting and developing a culture of openness, transparency and accountability and will</p> <ul style="list-style-type: none"> Routinely publish information through its Publication Scheme and favour prompt disclosure wherever possible Where information is not made available, explain clearly why and apply any exemptions from disclosure consistently and in accordance with legislation
Islington already exceed the pollution standards set and so such a vast and overreaching exercise is not warranted	<p>EU PM limits are a single metric for measuring the impact of our people-friendly streets measures. They are not even the only metric for measuring air quality in the borough – as the Islington Air Quality Strategy 2019-2023 states: “Despite significant improvements, Islington has consistently exceeded EU limits for NO2 in parts of the borough for many years.” It goes on to</p>

	<p>say: "Road transport accounts for almost half of NOx and over half of PM10 emissions in Islington. The main area where we can reduce emissions from transport is encouraging a modal shift towards more sustainable forms of transport and support individual and businesses to switch to less polluting vehicles when a vehicle is still required. Reducing car use provides huge benefits for everyone."</p> <p>Meeting the EU limits is not in itself a guarantee of healthy air quality. The Islington NHS Clinical Commissioning Group report on air quality from January 2019 states that: "Air pollution is a major environmental risk to health. There is no evidence for a safe level of various air pollutants, and adverse health effects are felt well below the legal EU limits that apply to England."</p> <p>Furthermore, the impact of LTNs goes far beyond improving air quality. It is a programme also designed to improve road safety, encourage better public health (by increasing active travel), enable better social distancing, reduce noise pollution and reduce carbon emissions. As part of the monitoring strategy for the LTNs we will be measuring air quality on local roads and side roads.</p>
<p>Islington is already a 20 miles per hour borough</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 major role in achieving this objective. In the four full years 2017-2020, 461 people were killed or seriously injured (KSI) on Islington's roads.</p> <p>LTNs installed in London in 2020 have been shown to reduce the number of injuries from road traffic collisions by half, relative to the rest of London, with no evidence of increased Page 7 of 28 injury numbers or risk on LTN boundary roads (view source). In the UK, the most common non-natural cause of death amongst children aged 5 – 14 is being hit by a vehicle (view source), with a mile driven on a minor road, compared to a mile driven on a main road, being twice as likely to kill or seriously injure a child pedestrian, and three times more likely to kill a child cyclist (view source).</p> <p>By reducing motor traffic volumes on minor roads, which have increased over recent years, the introduction of LTNs helps reduce road danger and open up active transport and play to children. The importance of taking action to create active travel</p>

	<p>opportunities for children is recognised as essential to tackling rising childhood obesity rates.</p>
<p>Covid measurements not applicable for LTN roads are wide/not a busy area</p>	<p>The measures the Council has introduced are consistent with the Streetspace Plan for London, developed by Transport for London in response to Covid-19 and aimed at creating more space on streets so people can walk or cycle while social distancing and easing pressure on public transport as the Covid-19 pandemic lockdown is lifted.</p> <p>On 15 May 2020, the Mayor of London and TfL issued interim guidance to London boroughs on the London Streetspace plan. Islington Council's proposals for People Friendly Streets are consistent with that guidance and the Department for Transport's statutory guidance 'Network Management in response to COVID 19' published under section 18 of the Traffic Management Act 2004. The Council is required to have regard to the DfT guidance in carrying out its network management duties under sections 16 and 17 of the 2004 Act.</p> <p>The DfT guidance states that 'Local authorities in areas with high levels of public transport use should take measures to reallocate road space to people walking and cycling, both to encourage active travel and to enable social distancing during restart', and 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.</p> <p>Even if your road is currently quiet, the Council needs to treat your local neighbourhood as a whole. It means that if the traffic filters only addressed the streets that are currently busy within the area, through-traffic could get displaced onto the next available residential street. The increasing use of apps and sat-navs and the expected increase of cars as the country emerges out of lockdown is expected to quickly turn a quiet street into a busy cut-through – this is why the Council need to implement traffic filters in a way that removes all through traffic.</p>

Comment unclear	Officers were unable to discern the content of the written objection. Objection has been noted and counted towards the total objections for the Highbury scheme.
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