

# LETTER TO DfT FROM 'KEEP HIGHBURY MOVING': DfT LTN REVIEW

Dear Colleagues,

This letter concerns broadly the Islington LTNs, and particularly the Highbury LTN. We wish to share with you our experience of the LTN problems, as a contribution to your current review of LTNs.

## 1. INTRODUCTION

LTNs were introduced into Islington on a so-called trial basis, with no traffic modeling, no real understanding of Islington's traffic profile (the extent of local v non-local traffic composition), and with shifting goals.

There have been no published criteria from Islington Council (IBC) for measuring and determining trial success. Monitoring of trial results has been limited and low-quality, and consultation, including with residents with protected characteristics, and with those who dwell on/use boundary roads belated, patchy, and opaque on key aspects.

Overnight LTNs divided local areas into protected enclave roads and overburdened boundary roads. They seemed to be broadly aimed at making enclave roads safer for cycling, without consideration of the wider impacts on important boundary road users such as users of buses, delivery vehicles or emergency vehicles.

Central to the LTN concept was the theory that the additional volume of vehicles displaced from LTN enclaves onto adjacent boundary roads would gradually evaporate, as drivers would choose to walk or cycle instead. This hypothesis assumed that LTN displaced traffic was primarily local. In fact, experience has shown that traffic evaporation has failed to occur and that, instead, considerably increased levels of congestion on many main roads have been generated. **This makes it crystal clear that much of the traffic targeted for evaporation was non-local.** Unfortunately, councils (including IBC) seem not to have grasped this, and have failed to adapt their LTN approach to address this reality.

**IBC has throughout firmly placed its focus on the inevitable gains made within the LTN enclaves, and has been blind to the consequent negative impacts taking place on the boundary roads.**

IBC has heavily promoted its so-called 'trials' throughout. In its literature it consistently published an alarming DfT statistic (subsequently proved to be incorrect) that there had been a 72% increase in traffic on London's minor roads over the last decade. IBC must have known (since it was from the same data source) that for Islington there had been a less than 5% traffic increase across all its roads, with increases on its minor roads comprising only a small fraction of that. It chose to ignore this modest figure for Islington and to promote the 72% figure instead, presumably with the intention of scaring residents into accepting LTNs.

IBC is an almost 100% Labour council, so there were no obvious checks, balances, and challenges on its LTN policy internally. As a result, concerned residents themselves began to conduct research, and to monitor council reports carefully, in an attempt to ensure some balance, dialogue and accountability.

Keep Highbury Moving (KHM)<sup>1</sup> was the first of these resident groups. Founder, Joanna Sargent, submitted 3 carefully researched and detailed formal complaints to IBC challenging: the inappropriate promotion of the 72% traffic statistic; IBC’s misleading representation of the Highbury interim monitoring results; and IBC’s misleading representation of the Highbury pre-consultation monitoring results<sup>2</sup>. **In brief, monitoring results were routinely presented as positive and supportive of trial success in a series of eye catching and upbeat key findings at the front of each Highbury monitoring results report, when the data in the body of these reports did not always support these findings.**

Challenges to IBC, highlighting where poor data has been misrepresented and inappropriately relied on by IBC, have been essentially ignored, or brushed aside with cut-and-paste replies not directly related to the points raised.

The LTNs so far introduced in Islington are:

Islington LTNs	Installed	Made permanent
St Peters	July 2020	November 2022
Canonbury East	August 2020	November 2022
Clerkenwell Green	September 2020	March 2022
Amwell	November 2020	October 2023
Canonbury West	November 2020	February 2023
Highbury West	January 2021	December 2023
Highbury Fields	January 2021	December 2023
St Mary’s Church	February 2022	July 2023

Under **phase 2** of the initiative (with LTNs now renamed as ‘Livable Neighbourhoods’) IBC has begun work on the following LNs: Mildmay East; Barnsbury and Laycock; the Cally; and Highbury New Park.

A further 6 schemes will be added under **phase 3**: Calshot; Dartmouth Park Hill – to be implemented as a joint scheme with the London Borough of Camden; Bunhill South and Barbican – to be implemented as a joint scheme with City of London; St John’s; Tufnell Park; and Annette Road.

Resident pressure groups Keep Islington Moving (KIM) and Keep Barnsbury Moving have also been created.

<sup>1</sup> <https://www.KeepHighburyMoving.com>

<sup>2</sup> The initial letter for each complaint is annexed: LETTER 1 Complaint to IBC February 2022 72% increase claim.pdf; LETTER 2 Complaint to IBC about inaccurate Interim Monitoring results February 2022.pdf; LETTER 3 Complaint to IBC about pre-consultation report comments March 2022.pdf (The letter trails for each of the 3 complaints are available on request). LEAFLET 1 2021 KHM INFORMATION FOR HIGHBURY RESIDENTS.pdf

## 2. THE LTNS' KEY GOALS, AND HOW THEY FARED

### 2.1 Improving air quality (cleaner and greener)

NO<sub>2</sub> trends in Islington were significantly and steadily improving long before its LTNs were introduced. As for the quality of the air on Islington's minor roads, the roads targeted for reduced traffic in LTNs, IBC's own Draft Transport Strategy Report 2019 (DTSR 2019) stated that:

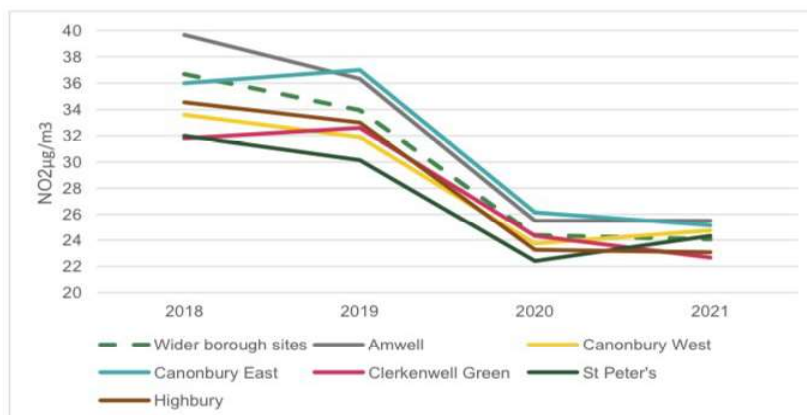
- only 6% of Islington's nitrogen oxide emissions were from its minor roads, and
- only 5.9% of its total carbon emissions were from vehicles on minor roads.

Despite these encouraging statistics, an alarmist narrative of poor air quality was adopted, with the promise that introducing LTNs into Islington would address this. IBC has been silent on the reality that emissions on minor roads were already very low, and that emissions on main roads (the new LTN boundary roads) were greater than on minor roads, and always have been.

The only data available for monitoring any LTN-associated changes in air quality is the data produced by IBC. This data is qualified as unreliable in IBC's own reports (referencing data missing, low monitoring site numbers, data not yet annualized, local influencing factors etc.). Taking the low reliability of the data results as a given, they show that changes in air quality in each of the LTN locations are no different from changes seen in the wider borough (LTN or no LTN). IBC's monitoring results reports openly admit that the results of such and such a trial "*reflect those in the borough more widely*", or that such and such trial "*had no significant impact/adverse impact on air quality*".<sup>3</sup>

This outcome is further confirmed in IBC's own Air Quality Annual Status Report 2021 (page 69), which shows that air quality in the 6 existing monitored LTNs was the same as in the wider borough:

**Figure 3. Annual average mean NO<sub>2</sub> ratified and bias-adjusted monitoring results 2018-2021 for Low Traffic Neighbourhoods (boundary, internal and non-road sites) compared to wider borough sites**



<sup>3</sup> LEAFLET 2 2023 July AIR QUALITY IN ISLINGTON LTNS COLLATED.pdf

There has been no public acknowledgement by IBC of this important failure when formulating its ongoing LTN policy.

## 2.2 Improving road safety

Improving road safety was another cornerstone promise of the LTN trials. This has proved to be little more than a soundbite. Despite the much-repeated key role of this objective, IBC has provided neither pre- nor post-trial road traffic data.

The reality is that Islington's roads were already safe by most standards long before its LTNs. Between 2017 and 2019 inclusive there were 7 road collision deaths across the whole borough, but all these deaths were on main roads and none were on minor roads<sup>4</sup>.

Since 2005 there has not been a single fatal road collision inside the area where the new Highbury LTN stands, but over the same period there have been 11 fatal collisions on adjacent main roads.

TfL London collision maps, show that **between 2017 and 2019 inclusive there were only 8 serious injury road collisions recorded on the footprint where the Highbury LTN now stands. By contrast there were 55 serious road injury collisions recorded (over the same 3-year period) on the roads that became boundary roads under the Highbury LTN trial.**

It has long been recognized that most of Islington's serious road traffic incidents typically occur on the borough's TLRN (main roads that TfL is responsible for) and that these have always been the busiest roads in the borough. Displacing traffic from safer roads inside LTN enclaves onto already busy and less main safe roads, in the name of road safety, is highly illogical.

**Unsurprisingly IBC has not provided any serious injury or death data in its results reports to demonstrate success with this goal.**

In the conspicuous absence of any improved road safety statistics, IBC has resorted to claiming success in reducing the speed of traffic. But this is a hollow claim. Under the Highbury LTN trial, **speeds on Highbury's internal roads decreased by on average only 0.4mph<sup>5</sup>.**

Again, there has been no public acknowledgement by IBC of this important failure when formulating its ongoing LTN policy.

## 2.3 Increasing active travel (healthier)

The third key stated goal that was relied on to justify the installation of LTNs in Islington was to help to promote active travel. The idea was that closing minor roads would encourage and enable residents to walk or cycle as a first choice for local travel.

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<sup>4</sup> By contrast, during the same period there were 54 suicides and 61 drug poisoning deaths in the borough. (ONS - Suicides in England and Wales 2002 to 2019; ONS Deaths Related to Drug Poisoning, by Local Authority, England and Wales, 1993-2022)

<sup>5</sup> LETTER 3 Complaint to IBC about pre-consultation report comments March 2022 .pdf; LETTER 4 Islington Tribune "Look at the record on road safety in Highbury" Rachel Bolt, May 2021; LEAFLET 3 KHM 12 MONTH SUMMARY OF HIGHBURY MONITORING RESULTS .pdf

The claim that active travel needed promoting in Islington is frankly unconvincing. Not long before the 2020 Covid lockdown, Islington Council's DTSR 2019 had recorded that:

- 81% of average daily trips made by Islington residents were already active and sustainable (made by walking, cycling or public transport), already exceeding the Mayor's 2041 target for London.
- only 16.6% of all trips in Islington were made by car, amongst the lowest of the Inner London Boroughs.
- car ownership in Islington had fallen to 31% of households, the second lowest rate of car ownership of all English local authorities.

**Islington residents were clearly already enthusiastically embracing active travel, without any need for LTNs to make this happen.** When encouraging residents to walk or cycle, rather than drive, no effort was made by IBC to find out what proportion of the traffic on Islington roads was local, and what was non-local.

Did the LTNs succeed in further improving our active travel performance in Highbury? Snapshot data included in our pre-consultation monitoring results report revealed that following the Highbury LTN installation, cycling on Highbury's internal roads increased by a mere 1%. No data was collected by IBC to show whether or not walking increased in Highbury. Informal local observation suggested no change<sup>6</sup>.

Again, there has been no public acknowledgement by IBC of this failure when formulating its ongoing LTN policy.

### 3. THE LTNS' UNFORESEEN NEGATIVE IMPACTS

#### 3.1 Downplaying the impact on boundary roads

One of the ironies of the whole LTN debate has been the way in which **benefits inside LTNs have been highlighted and promoted, while dis-benefits to boundary roads have been discounted, hidden, ignored, and ultimately dismissed.** This myopic approach, which places emphasis on one aspect only of the trials, has been a common theme nationally.

- In Islington consultation has taken place in such a way that LTN enclave residents have been the main respondents to questionnaires and 'commonplace' consultations.
- The responses of LTN residents/users and boundary road residents/users **have been merged in the Islington consultation results reports**, rather than making sure that the views of the latter of these two distinct groups are visible, and can be properly considered.
- Boundary road traffic volumes impact has been misleadingly minimised by adopting percentages in key findings. A 56% reduction in car numbers inside a lightly-used LTN, may amount to the same number of cars as a 3% increase on a heavily used boundary road, but without looking at the actual figures (and most residents will not) it sounds like an achievement.

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<sup>6</sup> LETTER 3 Complaint to IBC about pre-consultation report comments March 2022 .pdf; LEAFLET 3 KHM 12 MONTH SUMMARY OF HIGHBURY MONITORING RESULTS .pdf

- The rubber tubing method used by boroughs for vehicle counts works well on lightly used roads, but is unsuited to counting heavy traffic on main roads. Congested, slow-moving traffic is misconstrued by the pairs of rubber tubes as limited traffic. This has given deceptively low readings of traffic volumes for main roads.
- Where possible vehicle drivers will inevitably choose a less heavily congested road that takes them in the same direction as a more heavily congested one. For example, the corollary of reports of ‘traffic evaporation’ on Upper Street (which is a boundary road for some Islington LTNs) are the complaints of those living on Liverpool Road, where traffic has so greatly increased that some residents now refer to it as the “A1 bypass”.

The reality, although it seems impossible to get IBC to take it seriously, is that, as anyone who uses these roads will attest, many main roads and boundary roads have become much more congested and slow-moving since LTNs were brought in. Worse still, this has taken place in the wider context of car use in London having fallen by about 25% from 2010 onwards.

Main roads in London constitute 5% of the road network, but they carry 30% of the traffic<sup>7</sup>. The weight of traffic on main roads was already a problem, but it has been greatly exacerbated by newly displaced traffic from inside LTNs. This is not just an Islington phenomenon; in 2020, when LTNs were beginning to be brought in, London was the 16<sup>th</sup> most congested city in the world. By 2021 and 2022 it had become the most congested city in the world<sup>8</sup>.

### 3.2 Limitations of choosing micro rather than macro approaches to LTNs

The consultation processes have been on a micro street by street, LTN by LTN, borough by borough basis. Policy makers have not paid adequate attention to the bigger picture. **They ought to have been much more concerned with macro concerns, maintaining the viability of routes which run through many boroughs in both north-south and east-west directions.** Where were the urban planners and transport planners in all this?

Given the emphasis on persuading local people to walk or cycle, it appears that IBC officials have simply assumed that the cars they see on Islington’s roads are being driven by recalcitrant residents making unnecessary journeys. This cannot be true: only 30% of Islington households even own cars, and many of those cars will be parked for much of the day.

The congestion on Islington’s main roads must logically be caused by two other categories of vehicles: those starting and finishing their journeys elsewhere and passing through Islington as part of their journey, and those vehicles delivering into Islington from distant depots, together with the borough’s army of plumbers, builders, carpenters, electricians etc., who have mostly moved out to the suburbs but still come into Islington to work.

Despite the ready availability of ANPR technology, which would make it perfectly possible, IBC has shown no interest in finding out what percentage of vehicles travelling the roads are local, and could be successfully targeted through LTN initiatives, and what percentage are not. Our best guess is that something like 15% of vehicles are local at most, and 85% non-local. If this is the case, the emphasis on

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<sup>7</sup> <https://tfl.gov.uk/modes/driving/red-routes>

<sup>8</sup> “London congestion: capital becomes world’s most congested city” <https://www.bbc.co.uk/news/uk-england-london-59559863>

encouraging active travel in Islington is completely misconceived, while the massive consequential problems being generated for the 85% are ignored.

### 3.3 Impact on bus lanes

One of the most important negative impacts arising from a desire to provide safer urban cycling, has been the replacement of bus lanes by cycle lanes. This began in 2015.

The bus network, which takes over 11% of all journeys in the capital, is increasingly having to share a single lane with all other vehicles, while cyclists - 3% of all journeys - have a dedicated lane to themselves.

Bus users are overall among the capital's poorer citizens – and are more likely to be women, ethnic minorities and the disabled. Cyclists, by contrast, tend to be higher earning men. This suggests an important justice and equality issue to the loss of bus lanes<sup>9</sup>.

**The Confederation of Passenger Transport, representing bus operators, has spoken up about the delays caused to buses by the removal of bus lanes and the creation of LTNs without any accompanying bus prioritisation measures on adjacent main roads.**

There should be protection for cyclists, but maybe a reversion to shared bus and cycle lanes is the answer, coupled with cycle lanes being located more on roads which are not also carrying buses.

### 3.4 Cumulative impacts of LTNs on main roads

Given the additional congestion we have seen already on Islington's finite number of main roads, we are concerned for the future as more and more LTNs come on-stream. **Future proposed LTNs risk generating major additional congestion on roads that are already gridlocked for much of the day for buses and other vehicles alike.**

Attempts to raise this issue with IBC have not received any kind of response, and it seems that the threat has simply not been recognized. Yet it is very clear from the testimony of bus drivers and workmen, driving routes from Outer to Inner London and back, along main roads which are now lined with LTNs, that the cumulative additional traffic congestion on these arterial roads is already a major problem.

As each new LTN comes on-stream the main road congestion will get worse.

### 3.5 Negative impact on businesses

KHM carried out extensive research on the impact of the two Highbury LTNs on local businesses. Every shop from Finsbury Park to Highbury Corner, as well as the lower end of Holloway Road was visited, and shopkeepers spoke to KHM representatives.

Over 93% of all the businesses KHM visited (just under 300 businesses) signed formal objections against the two LTNs, citing their reasons. These objections were hand delivered to IBC. There was no response from IBC to any of these businesses at that time.

Many local businesses were hit by the Covid crisis, with some reinventing themselves by offering take away and delivery services. The LTNs proved a further obstacle, and many struggled to keep staff on and stay afloat. Cafés were cut off from passing trade and impromptu takeaways, and those offering deliveries could often no longer provide an efficient service.

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<sup>9</sup> 'Travel in London 2023'. London Travel Demand Survey 2022-2023. TfL December 2023

Since COVID many businesses have reported a downturn in trade. What used to be a buzzing set of shops at Highbury Barn is now much quieter.

### 3.6 Negative impact on disabled residents

Transport for All (TfA), the only UK disability group to focus exclusively on transport, explored the impact of LTNs on disabled people. In its Pave the Way Report (January 2021) it published research that showed that 77% of disabled residents reported an increase in journey time, with participants reporting that these increases were quite considerable, and that disabled people felt disproportionately impacted, especially since walking and cycling was unavailable to many of them.

As at February 2021 Islington had nearly 9,000 Blue Badge holders, as well as other disabled residents who do not qualify for a Blue Badge. (16% of Islington's 206,125 residents have a disability.) On introducing the LTN trials IBC published an overarching Resident Impact Assessment (RIA) in June 2020. This acknowledged (page 7) that disabled people could be "proportionately disadvantaged" and that there could be a negative impact on Blue Badge holders. It promised (page 10) that "those who need to use a car because of a disability or mobility impairment will be as much as possible unrestricted in their use...".

Individual RIAs, for the specific wards in which LTN trials were installed, promised that there would be pre-consultation engagement. Individual RIAs also promised that there would be consultation through workshops/disability focus groups that specifically represent disabled residents in each LTN trial. This promised consultation was poorly executed at best.

**Islington's initial LTN model included no provisions at all for disabled residents.**

It was eventually adjusted in December 2021 to allow Islington Blue Badge holders living within an LTN (or on one side of the boundary road of an LTN!) to apply to nominate a single vehicle registered to their property to be allowed through the filters in the Badge holder's "home" LTN, but only when the Badge holder was in the nominated vehicle. **By early 2023 only roughly 900 Blue Badge holders had been granted this "home" LTN exemption.**

In January 2023 IBC bowed to further pressure and added an individual exemption scheme. Under this scheme a disabled person is required to produce medical evidence and make a case to IBC employees for permission, on a case-by-case basis, to travel through specified Islington filters. **By March 2023 only 30 Blue Badge holders, including 11 disabled children, had been given full exemption through Islington LTN filters under the individual exemption scheme.**

Given the LTN travel restrictions on the majority of Islington disabled residents it is unsurprising that collated consultation data across the first 7 LTN trials revealed that 73% of disabled respondents completing the Feedback Survey agreed with the statement "*There is nothing I like about this trial*".

## 4. FLAWED CONSULTATION AND MONITORING

The LTN consultation process has been flawed in many ways, with IBC determined at every turn to move forward with LTNs, regardless of objections. We highlight some examples here.



#### 4.1 The Consultation relied on to make LTN trials permanent

IBC adopted a consultation process that included zoom meetings (with restricted opportunity for residents to contribute), workshops, a Feedback Survey (FS) and a Consultation Questionnaire (CQ). Many residents have deeply mistrusted the consultation process and have expressed concern about skewed questioning. Resident attendees at public in-person IBC committee meetings have been strongly opposed, with routinely about 90% of attendees being vocally against the trials.

**Throughout the trials IBC has, confusingly, publicly celebrated consultation results as supportive, when a closer look at them reveals that they are not.**

Councillor Rowena Champion, Executive member for Environment, Air Quality and Transport, presented a paper in January 2023 to IBC's Executive Committee (EC) claiming LTN success to date. The EC then voted to continue with the initiative and to cover 70% of Islington with road closure schemes. Councillor Champion's paper presented consultation feedback to the EC in an overly positive light, when 77% of the feedback sent to IBC's designated inbox was negative, and only 13% positive.

Her paper failed to mention that the CQ reports presented internal road and boundary road responses as a combined single figure, even though these different respondent groups' interests in the trials are directly opposed, so that feedback from those most badly affected by the trials, was obscured. Her paper also failed to address the negative aspects of what the monitoring results showed regarding the 7 trialled LTNs.

KIM raised concerns with the EC on 10th March 2023 about the misleading aspects of Councillor Champion's paper, and it chased for a response on 8th August. None was received<sup>10</sup>.

**Inexplicably, at no point during the consultation process were respondents asked whether the LTN trials should be adjusted/abandoned/made permanent.** These were fundamental questions that should have been asked and their absence begs the question why was this?

As for whose voices are being represented in the consultation process, some concerning data (across the first 7 trials) includes the following:

- 44% of the CQ respondents had no direct link to an Islington LTN trial and were allowed to comment from other areas outside Islington.
- Only 14% of the CQ respondents lived on a boundary road.
- BAME respondents accounted for only 7% and 8% respectively of the respondents to the FS and CQ<sup>11</sup>.

Finally, IBC has relied (in common with similar arrangements in other boroughs) for its most constant and trusted ongoing consultations, on a narrow cycling lobby, Cycle Islington, meeting with them quarterly. No disabled people (16% of Islington citizens), workmen, delivery men, shopkeepers, bus-users, bus drivers or boundary residents were given the same level of opportunity for regular access and influence. Cyclists on the whole travel for shorter distances than these other road users, and seem to have completely missed

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<sup>10</sup> LETTER 5 KIM letter by email to Executive Committee dated 10<sup>th</sup> March 2023

<sup>11</sup> "LEAFLET 4 COLLATED CONSULTATION RESULTS FOR THE FIRST SEVEN ISLINGTON LTN TRIALS" KIM 2023

most aspects of the bigger picture. **What we have, in the case of LTNs, is very much a cyclists'-eye analysis of problems and solutions.**

#### 4.2 Unreliable monitoring results provided a poor basis for making LTNs permanent

The LTN schemes each relied on 2 sets of monitoring results (interim and pre-consultation) to measure their success. Consultants, Project Centre, produced 6 of the 12 monitoring reports for the trials that have been declared a success and made permanent.

	Interim results report	Pre-consultation results report
<b>Highbury</b>	Project Centre	Systra
<b>Canonbury West</b>	Project Centre	Systra
<b>Canonbury East</b>	IBC's PFS team	Project Centre
<b>Clerkenwell Green</b>	IBC's PFS team	Project Centre
<b>St Peters</b>	IBC's PFS team	Project Centre
<b>Amwell</b>	IBC's PFS team	Project Centre

KHM was concerned that the Highbury interim monitoring results report contained fundamental errors and misleading findings, including a false key finding of improved air quality, and the extraordinary statement that the Highbury LTNs had reduced traffic on the Holloway Road by 42%.

KHM raised its concerns with every Islington Councillor, but none responded. Joanna Sargent then submitted a formal complaint to IBC dated 4<sup>TH</sup> February 2022. IBC eventually arranged for the report to be audited by its panel consultants, Systra. Systra's audit report, confirming critical defects in Project Centre's report was then published, and IBC made a public apology.

Given the extent and misleading nature of the flaws, and similar complaints on social media and at IBC LTN public meetings concerning other Islington LTN monitoring reports, Joanna Sargent called in March 2022 for all the monitoring results reports in the Islington LTN trials to be audited. IBC responded that the Project Centre reports were under review. However, to date no audit/review findings for the other 11 reports have been published.

Data and key findings from the monitoring results reports have underpinned IBC's decisions to make trials permanent. The results reports were also fundamental in shaping public perception of trial outcomes. The question mark hanging over just how flawed at least half, and potentially more, of these monitoring reports were undermines public confidence in IBC's decisions to make all the above Islington LTNs permanent.

## 5. CONCLUSIONS

It is clear from social media that there has been a systematic national roll out of these trials, with a common steamroller approach from the initiators regarding methods and getting the trials made permanent. Residents who question or oppose them are ignored, and there is much bluster as to whether they are the noisy minority or the tip of a silent majority.

Failure to separate the potentially opposed responses of those living inside LTN enclaves from those living or working on boundary roads means that the consultations conducted have provided opaque answers. The reality is that those living inside LTNs have had the benefits of living on side roads further enhanced, while the lives of many others have been seriously negatively affected. The interests of the two opposed groups cannot readily be reconciled.

Justice and equity require that the second group gets an equal hearing with the first group, and many changes would need to be made for this to become a reality, including much more systematic consultation with a far wider range of regular consultees than is currently the case.

As this letter to you has set out, our principal concerns, in summary, are as follows:

- 5.1 What goes on inside LTNs has been given far too much attention, at the expense of their impacts on boundary roads and on other main roads in the area. A street by street and LTN by LTN approach has ignored broader issues.
- 5.2 LTNs have failed to meet their most fundamental goals: there has been no documented improvement in air quality; no documented improvement in road safety - and possibly a deterioration as a result of excessively congested main roads; and no evidence of meaningful increased active travel.
- 5.3 Problems for boundary roads have been systematically under-investigated and/or denied.
- 5.4 The notion of traffic evaporation relies on the basic assumption that most of the traffic on Islington streets comes from inside LTNs, and can be neutralised by promoting active travel to residents. The extent of the traffic merely passing through Islington, which cannot be made to evaporate by local residents' change of travel mode, has been under-recognized.
- 5.5 The direct and indirect negative impact of LTNs on London's bus network has been largely ignored.
- 5.6 The cumulative impact of more and more LTNs changing road use patterns on fixed numbers of boundary and main roads has been overlooked. This concerns both gridlocking within Islington and the cumulative impact of neighbouring boroughs' LTNs upon one another.
- 5.7 Travel by cycle is zealously promoted, but this entirely ignores the reality that cycling accounts for only 3% of journeys and is still an option which many categories of traveller are unlikely to be able to adopt.
- 5.8 The monitoring of trials has been poor, with the representation of data results often skewed.
- 5.9 Decisions have been taken by IBC to make trials permanent based on a falsely positive spin on the results of the monitoring and consultations.
- 5.10 Complaints and concerns have been ignored or brushed aside by IBC, or met with cut and paste responses which do not address the points being made.

## **6 RECOMMENDATIONS**

6.1 If problems continue and accumulate, as we suspect they will, current LTNs will need to be adapted or removed, and a far more fine-tuned approach adopted. There will be some minor roads inside some of the current LTNs which could usefully stay closed, but others will need to be re-opened to increase the resilience of the road network, and to lessen excessive pressure on over-burdened main roads.

The crude one-size-fits-all application of the LTN concept has caused many more problems than it has solved.

6.2 All road closures need to be properly researched, monitored, and consulted on. They need to be accompanied by the re-creation of bus lanes, the improvement of public transport in Outer London, and continued schemes which will help to streamline the delivery of goods to Inner London. There is a need for a much closer working relationship on these schemes between the London boroughs, TfL and DfT, and – above all - far more local, constant, high-quality consultation with all categories of local resident and road-user. Ultimately, they are the experts on local road use.

6.3 Pursuing LTNs in a vacuum without any forward movement on these other aspects of Keeping London Moving is doomed to failure.

6.4 Reliance on real time traffic data (as opposed to very short periods of rubber tube monitoring) would greatly improve policy makers' understanding of traffic volumes and flows on main and boundary roads.

6.5 Each of Islington's LTNs needs now to be re-examined with these broader issues and concerns in mind, and some roads need to be reopened.

#### **A final recommendation to DfT:**

Just as insights were lost at LTN level by conflating the views of those who lived inside LTNs with those who lived on LTN boundary roads, so there is a risk that DfT's review may fail to distinguish sufficiently between LTNs in highly congested inner-city boroughs and LTNs in Outer London.

These two broad areas differ in fundamental ways: in Outer London population per hectare is around 39, while in Inner London, it averages 101. (Islington's population per hectare, the second highest in the country, is 138.) Inner London is blessed with excellent public transport, though it is still recovering from the pandemic. Outer London is much more poorly served and is much more car-reliant. It is possible for many people to cycle to work in Inner London, while this is a good deal more unlikely in Outer London.

For all these reasons, and no doubt others, there is much to be learned from making sure that the DfT review disaggregates data about Inner and Outer London LTNs to see what the salient differences might be and, in all probability, to make two separate sets of recommendations.

Signed

**KEEP Highbury Moving**

**30<sup>th</sup> JANUARY 2024**

#### **APPENDED:**

Annex containing all letters referred to in footnotes

Annex containing all leaflets referred to in footnotes

## **LETTERS**

LETTER 1: Complaint to IBC 72% increase claim, February 2022

LETTER 2: Complaint to IBC about inaccurate Interim Monitoring Results February 2022

LETTER 3: Complaint to IBC about Pre-Consultation Report comments March 2022

LETTER 4: Islington Tribune "Look at the record on road safety in Highbury" Rachel Bolt, May 2021

LETTER 5: Email from Keep Islington Moving to IBC Executive Committee 2023

## **LEAFLETS**

LEAFLET 1: KHM INFORMATION FOR HIGHBURY RESIDENTS 2021

LEAFLET 2: KHM AIR QUALITY IN ISLINGTON LTNS COLLATED July 2023

LEAFLET 3: KHM 12-MONTH SUMMARY OF HIGHBURY LTN RESULTS 2022

LEAFLET 4: KIM COLLATED CONSULTATION RESULTS FOR THE FIRST SEVEN ISLINGTON LTN TRIALS  
Feb 2023