

**Andrew Ellson (Times Reporter): Comments on Government LTN Guidance (Twitter post)**

Generally speaking, the guidance to councils appears quite sensible and is clearly intended as a rebuke to local authorities that have chosen to implement LTNs without proper consultation or support from local residents.

Yet in recent days many LTN advocates have suggested that the guidance is some sort of vindication, saying it only reinforces what councils have been doing already. That is very far from the truth.

For example, the guidance states that councils “should use objective methods, such as professional polling to British Polling Council standards, to establish a truly representative picture of local views”.

This is quite a stringent requirement and should, in theory, mean local authorities can no longer get away with consultations (designed by cycling lobby groups) that contain leading questions and can easily be gamed by activists on either side of the debate.

The guidance also reminds councils that they should consult bus operators in advance of implementing an LTN, something we know some authorities, such as Lambeth, have not been doing. They are also told to consult the emergency services – something you might not think they would need reminding about but the LTN review reports that 16 per cent of schemes were implemented without talking to the police, fire or ambulance services.

Another example from the guidance where councils are going to have to up their game comes in the section called “design principles for effective LTNs”. This states that schemes “should have clear aims and objectives, with a rationale and evidence to support intervention and measurable metrics of success”.

This is going to present a challenge to many councils which, up to now, have chosen not to identify specific aims and objectives or defined metrics of success. Holding councils to this higher standard can only be welcome.

However, the “measurable metrics of success” are only as good as the data that the councils present and sadly the vehicle counting tubes that most authorities use can hugely under-report traffic levels, particularly on congested boundary roads. The data these tubes provide can also be gamed by where and when they are placed. It is therefore disappointing that the guidance does not also require councils to conduct some form of supplementary human counting of traffic on the most congested roads to validate the data provided by tubes.

The guidance, rightly, also has plenty to say about what councils must do to ensure schemes do not make life worse for the disabled. Sadly we know this is necessary because the review states that more than one in ten LTNs were implemented without disabled groups even being consulted, which seems an abject failure of government.

The guidance reminds councils that “accessibility requirements and the Public Sector Equality Duty apply to all measures”. It adds that councils “should always consider exemptions for Blue Badge holders”, which we know in many cases has not been happening and is something many LTN advocates object to for some unfathomable reason.

The guidance also states that councils should consider giving local residents and those making deliveries permits to travel through restrictions. Again, this seems like a sensible idea that would result in the schemes only hitting genuine “through traffic” and having much greater public support but is an anathema to most LTN advocates. However, because the guidance states only that councils should consider this then the chances of many actually doing it are slim to none.

Another area where councils are going to have to up their game is on planning and monitoring LTNs. The guidance says councils should collect “appropriate data” in advance and during monitoring to ensure there is “a robust evidence base on which to develop proposals and make decisions”. We know that in many LTNs this simply has not happened. My local LTN, for example, was introduced in 2020 despite the last traffic count on the main boundary having been conducted in 2014.

The guidance goes on to list the data councils are expected to gather this is going to make it much harder for councils to justify new LTNs and keep them once introduced. It says the data should include “traffic counts, pedestrian and cyclist counts, traffic speed, journey times both within and around the perimeter, patterns of traffic flow, air quality data (particularly the possible air quality impacts of displaced traffic), public opinion surveys and consultation responses”.

The guidance to monitor journey times around the perimeter of LTNs before and after implementation is particularly welcome and I cannot think of a single case where this has been done so far (although I am prepared to be corrected on that).

There are also other parts of the guidance that, if adopted by councils, will significantly change the design of future schemes. For example, the guidance notes that physical barriers “are more likely to be appropriate for small schemes only”. This has not been the case up to now.

The guidance also states that “warning notices should be issued for first-time contraventions for a period of 6 months after new schemes are implemented, or existing ones are made subject to camera enforcement for the first time”. This has not been happening at present. It adds that “traffic management schemes should be designed to work for local communities and never as a revenue raising tool”. Ha.Ha.

All of this seems eminently sensible but is only as good as councils’ willingness to adhere to the guidance and the consequences for them should they choose to ignore it.

Sadly, there is little substance in the guidance on how it will be enforced. It only really states that the transport secretary “reserves the right to take into account adherence to this guidance in relevant future transport funding allocations”. That is not a very big stick. There is also a commitment to consult on removing access to DVLA records for recalcitrant councils but this looks fraught with difficulty and, realistically, will likely never happen.

This is the main flaw in the guidance – there is little that can be done if councils choose not to ignore these protocols. There is not even a mechanism by which disgruntled residents or groups can submit evidence to the DfT of a council’s failure to adhere to the guidance.

Basically this guidance relies on the good will of councils and those in charge of local transport policy being sensible, moderate and rational. Many who have engaged with councils over LTNs know this is all-too often not the case.

And that is a shame because otherwise this guidance is generally good and would lead to better policy if it was adhered to.

In many ways it is astonishing that councils should need reminding of so many simple principles of good governance but sadly too many LTNs have been implemented without consideration of the impacts beyond the area itself while residents who identified problems and shortcomings or suggest sensible mitigations have, in many cases, not just been ignored but cast as reactionaries or petrol heads. Let’s hope this guidance changes things but I am not hugely optimistic. |