

Equalities Impact Assessment: Full Assessment

Summary of proposal

Name of proposal	People-friendly streets LTN Individual Exemption Policy trial implementation
Reference number (if applicable)	
Service Area	Climate Change and Transport (Transport projects and people- friendly streets)
Date assessment completed	14/12/2022

1. Please provide a summary of the proposal.

Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

This report addresses Equality impacts regarding the low-traffic neighbourhood (LTN) case-by-case exemptions policy ("Individual Exemption policy") to be introduced on a trial basis from early January 2023 for at least three months under the people-friendly streets programme. The Individual Exemption policy provides for exemptions not covered by the Home LTN policy in accordance with set eligibility criteria on a case-by-case basis. Following the trial, a decision on whether or not to adopt the Individual Exemption policy in its current form as described in the report which this EqIA accompanies or in an amended form will be the subject of an Executive decision following consideration of feedback received during the trial.

LTNs are transforming the way people travel in Islington, as set out in the Islington Transport Strategy (2020) and Islington's Vision 2030 (Net Zero Carbon) Strategy 2020. As of September 2022, six of the seven LTNs have published 12-month monitoring reports and held full public consultations. Monitoring results have generally shown the schemes achieving the overall objectives of healthier, safer, cleaner and greener streets. Consultations have also shown early evidence of behavioural change in line with the objectives of the scheme – 1 in 5 residents across six LTNs implemented between 2020 and 2021 indicated they are more likely to walk or cycle than drive for short trips (data was not available for schemes implemented after 2021 at the time of this analysis).

LTNs were initially rolled out with limited exemptions to include emergency services, refuse collection and some council vehicles such as Accessible Community Transport (ACT). No other vehicles were offered exemptions. The reason for not allowing exemptions is because all addresses in Islington remain accessible by motor vehicle, with schemes designed so that all homes, shops and services are accessible by vehicle without the need for an exemption. Not allowing exemptions also creates a safer environment for people to walk, wheel or cycle on local streets and aims to reduce congestion and pollution on main roads through encouraging widespread mode shift to active travel, particularly for shorter trips.

Following feedback from organisations including Disability Action in Islington (DAII), the Carer's Forum, Islington Parents' Forum, London Travel Watch, Transport for All (TfA), Keeping Safe sub group, Power and Control, and individual residents' correspondence the council amended its position on exemptions and implemented the Home LTN policy on a rolling basis from December 2021. The Home LTN policy offered an exemption to Blue Badge holders who

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live inside a low traffic neighbourhood in Islington (including on the LTN side of a boundary road) and have access to a vehicle registered to their home address.

Published as an appendix to the Executive report, the 2021 programme-wide Resident Impact Assessment (RIA) carried out a detailed evaluation of the impact of the changes to the people-friendly streets programme as outlined in the Executive report, including identifying the ways in which the Home LTN exemption policy would positively and negatively impact those with protected characteristics. Note that in October 2020, all Equalities Impact Assessments in Islington were referred to as Resident Impact Assessments. As of November 2021, the council reverted back to calling them Equalities Impact Assessments. The RIA did not identify any significant equalities impacts for the proposed changes and set out plans to mitigate any potential negative effects such as increased levels of motor traffic by monitoring traffic levels at filters after the exemption was implemented to ensure that traffic volumes remained low.

During formal consultations (held after each low traffic neighbourhood had been in place for at least 12 months) the council continued to engage with disabled people to gather feedback on the proposed Home LTN policy. Each scheme's consultation questionnaires included open response ('free text') questions on the proposed Home LTN exemption policy for Blue Badge holders. After the policy was implemented, the council continued to listen to feedback on the exemptions and amended the policy in July 2022, relaxing the requirement that the exempt vehicle must be registered to an address within an LTN. This change demonstrates the council's willingness to provide reasonable adjustments for those who could be substantially disadvantaged by LTNs due to a disability or chronic condition.

In addition to recommending the Home LTN exemption for Blue Badge holders, the Executive Report committed to developing a separate exemption route for people who do not meet the criteria for the standard (Home LTN) exemption permit under an 'exceptional circumstance dispensation'. That commitment has been realised as the Individual Exemption policy.

The proposed Individual Exemption policy aims to deliver a reasonable adjustment for individuals who rely on a vehicle for travel and who could be substantially disadvantaged by increased time spent in a vehicle or re-routing of trips as a result of LTNs due to a disability or chronic health condition.

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The individual exemption will reduce time spent travelling by vehicle in and through Islington's low traffic neighbourhoods for those who find it considerably difficult and/or distressing to sit in a vehicle for an extended period of time or experience re-routing of journeys due to a disability or chronic health condition.

The Individual Exemption Policy is informed by an evidence base jointly commissioned by the London Boroughs of Enfield, Hackney, Haringey and Islington and produced by SYSTRA Ltd (Systra) as the 'North London Boroughs LTN Exemption Policy Review'. The Systra report combined literature review, desk-based research and stakeholder interviews to produce recommendations for considerations of possible individual exemption policies and processes to enact them. The recommendations prepared by Systra are designed to be adapted to fit the local context of each borough, I.e., number of LTNs, accessibility and availability of public transport, resource available in the council etc.

The policy was subsequently developed with internal input from council services including Policy and Equity, Safeguarding and Family support, Accessible Community Transport and the Blue Badge team (Parking Services). Externally, an Occupational Therapist from the NHS was also asked to provide feedback on the conditions the policy lists for eligibility and the medical evidence requirements.

The council has also taken into account its continuing, anticipatory duty, owed to disabled people generally, to make reasonable adjustments to avoid disabled people being placed at substantial disadvantage compared with people who are not disabled by the implementation, development and operation of the LTNs and to take such steps as it is reasonable to take to avoid that disadvantage, and recognises that those steps may well vary depending on the nature of a person's disability and the nature of any disadvantage.

The council is committed to continuing the roll out of a borough-wide programme of people-friendly streets schemes including low-traffic neighbourhoods, liveable neighbourhoods, school streets and cycleways.

This EqIA relates to the trial implementation of the Individual exemption policy as part of the people-friendly streets programme and should be read in conjunction with the 2021

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programme-wide RIA, and the scheme specific RIAs/ EqIAs related to decisions taken on their continuation including the implementation of Blue Badge exemptions.

2. What impact will this change have on different groups of people?

Please consider:

- Whether the impact will predominantly be external or internal, or both?
- Who will be impacted – residents, service users, local communities, staff, or others?
- Broadly what will the impact be – reduced access to facilities or disruptions to journeys for example?

This assessment does not consider the impact of the low-traffic neighbourhoods overall, as these impacts have been considered in the people-friendly streets programme-wide RIA dated September 2021. Each scheme has also been subject of an individual EqIA published on a rolling basis as scheme decisions were taken from December 2021 to June 2022. Note that in September 2021 all Equalities Impact Assessments in Islington were referred to as Resident Impact Assessments. The Individual Exemption policy may offer an exemption to people who can demonstrate on provision of acceptable evidence that they or their child(ren):

- Find it considerably difficult to sit in a vehicle for an extended period of time due to a disability or chronic health condition
- Experience overwhelming psychological distress from extended or re-routed trips due to a disability or health condition

Without intending to represent an exhaustive limitation a chronic condition would be one which: is persistent or long lasting (likely to last longer than one year); requires ongoing medical management and/or treatment; and/or limits activities of daily living.

The exemption will apply to all camera enforced traffic filters with "No Motor Vehicle" restriction signage installed after 2020. The exemption will apply to all current and future LTNs and Liveable Neighbourhoods (LNs). This means that individuals with an exemption will not

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need to provide details of journeys impacted by LTNs as part of the application process nor take any action if a new LTN/LN is implemented while the exemption remains valid.

The exemption will be offered to one vehicle per eligible applicant. One exemption holder may not exempt multiple vehicles. This is because each additional vehicle on the road detracts from the overall objectives of the programme and reduces potential mode shift. Like the Home LTN policy, the exemption will be registered to a vehicle, not an individual and if an individual is eligible but does not have their own vehicle, they may nominate someone else's vehicle such as a professional or informal carer's vehicle.

The exemption holder must be in the nominated vehicle, either as driver or passenger when it passes through a traffic filter. If the exemption holder is not in the vehicle when it passes through a filter, a PCN may be incurred. Individuals who are found to be undertaking journeys through camera enforced traffic filters without the exempt individual in the vehicle may have their exemption revoked.

Exemptions will be valid for a three-year period, after which they will be subject to a review during which the applicant may be asked to provide additional evidence. If applicants are unsuccessful in their exemption application, they have the right to a review process during which they can submit further evidence for consideration.

The proposed Individual Exemption policy aims to deliver a reasonable adjustment for individuals who rely on vehicle travel and as a result of disabilities or chronic conditions who rely on vehicle travel and who could be substantially disadvantaged by increased time spent in a vehicle or re-routing of trips as a result of LTNs. The policy is intended to enable applicants to undertake journeys that would not otherwise be possible or would only be possible with considerable difficulty or overwhelming distress.

The individual exemption will not be granted to all Blue Badge holders in the borough as individual Blue Badge holders may not be substantially disadvantaged by longer journey times and/or re-routing of trips as a result of these contributing to considerable physical discomfort or overwhelming psychological distress. For example, some Blue Badge holders may experience difficulty walking and such a condition could merit a Blue Badge on the basis that the holder needs to park close to their destination to reduce/minimise pain caused by walking.

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As the individual exemption is for driving, not parking, and is designed to mitigate the difficulties caused by a disability or condition while travelling by vehicle, not all Blue Badge holders would necessarily meet the criteria set by the Individual Exemption policy. Applicants will need to provide evidence to demonstrate their eligibility which will be assessed as part of the application process.

Careful consideration was given to the number of traffic filters to which this exemption will apply. To exempt eligible individuals from all camera-enforced traffic filters with "No Motor Vehicle" restriction signage in the borough will reduce stress and eliminate the need for journey planning through or around specific filters/roads for people or parents of children who find it considerably difficult to sit in a vehicle for an extended period of time or experience psychological distress from extended or re-routed trips. Applying the exemption to all camera-enforced filters also eliminates any potential confusion as to which filters a beneficiary of the policy may drive through.

This approach also simplifies the application process for individuals as it does not require them to submit details of specific journeys, routes or traffic filters that they require exemption from. The borough-wide exemption is also designed to be "future proof" as the council continues to rollout people-friendly streets schemes across the borough.

Lower traffic volumes in LTNs benefit people from all walks of life who choose to walk, wheel and cycle by reducing the negative impacts of traffic, as well as those who are unable to mode shift and must rely on vehicles to travel through the borough. It is considered unlikely that the Individual Exemption policy will lead to an unacceptable increase in traffic in and through LTNs which would have the potential to compromise the integrity of the LTNs. Based on correspondence received and internal engagement, it is not likely that all filters will experience the same increase in traffic volumes but that a variable increase is expected depending on whether filters are part of previously main cut-throughs which are part of regular journeys that eligible individuals take. It is expected that eligible individuals will be mostly making journeys that are not taken by public or more active transport. Any problematic increases in traffic volumes will be reviewed and efforts will be made to mitigate these effects.

The individual exemption poses a small risk of increased danger from traffic at filters. Most of the borough's existing LTNs will have been in effect for more than two years and residents will

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have adapted to reduced vehicle volumes on local streets and a minimal amount of through traffic. However, more latterly people would have also become accustomed to vehicles exempt under the Home LTN policy travelling through LTN filters. Children, older people and people with disabilities are particularly at risk of collision in these areas when traffic volumes increase. With regard to this risk, the policy instructs exempt individuals to approach filters slowly and with caution, having regard to people who are crossing the road or cycling.

The individual exemption is preceded by the Home LTN policy which exempts approximately 900 Blue Badge holders across the borough from the traffic filters in the low traffic neighbourhood in which they reside. The impact of the Home LTN exemption has been monitored and has established an expectation that exempt vehicles will be passing through traffic filters where exemptions are introduced. Given the limited nature of the individual exemption policy, this impact is expected to be minimal however in combination with the number of individuals already eligible under the Home LTN policy it is still noted as a risk. Implementing the policy on a trial basis serves to minimise this risk as the trial will allow for a period of feedback ahead of a final decision being taken on the policy.

3. What impact will this change have on people with protected characteristics and/or from disadvantaged groups?

This section of the assessment looks in detail at the likely impacts of the proposed changes on different sections of our diverse community.

3A. What data have you used to assess impacts?

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

	London	Islington
	Total: 8,173,941	Total: 206,125
Gender: Female	51%	51%
Gender: Male	49%	49%
Age: Under 16	20%	16%
Age: 16-24	12%	14%
Age: 25-44	36%	42%
Age: 45-64	21%	19%
Age: 65+	11%	9%
Disabled	14%	16%
Ethnic group: BME	40%	32%
Ethnic group: White	60%	68%
Religion or belief: Christian	48.5%	40%
Religion or belief: Muslim	12%	9%
Religion or belief: Other	10%	4%
Religion or belief: No religion	51%	51%
Religion not stated	49%	49%

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Table 1 - demographics of London and Islington (Source: 2011 Census data available at: <https://www.nomisweb.co.uk/>)

The proposed policy will have borough wide impacts, as the exemption will apply to all low-traffic neighbourhoods in Islington. 16% of people living in Islington identify themselves as disabled compared to the London average of 14%.

Whilst private cars, taxis, and private hire vehicles (PHV) can be an important means of transport for disabled people, the main means of transport used by disabled Londoners at least once a week are walking (81%), bus (58%), car as passenger (42%) and car as driver (24%).¹

Analysis of the London Travel Demand Survey (LTDS)² during the period 2016-19 shows the breakdown of all trips by mode shown in Table 2:

Mode	All users in London	Disabled people in Islington
Walk	42.0%	41.2%
Pedal cycle	4.9%	1.2%
Car driver	7.4%	8.9%
Car passenger	6.2%	16.7%
Motorcycle	0.1%	0.0%
Van	0.3%	0.2%
Bus (public)	14.3%	14.4%

¹ [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://tfl.gov.uk/road-traffic/understanding-our-diverse-communities-2019)

² [Consultations & surveys - Transport for London \(tfl.gov.uk\)](https://tfl.gov.uk/road-traffic/consultations-surveys-transport-for-london)

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Underground	15.0%	11.4%
National Rail train	4.9%	1.7%
Taxi - London black cab	0.8%	1.7%
Taxi - other/minicab	1.6%	1.5%
London Overground	2.2%	1.1%

Table 2 - Percentages of different trips by mode by different users (Source: London Travel Demand Survey: <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/consultations-and-surveys>)

The LTDS analyses a sample of over 18 million trips every year, and as such it provides a comprehensive picture of travel patterns. It is worth noting that when focusing on trips undertaken by disabled Islington residents the size of the sample is only a small proportion of the overall sample. However, this is considered the best data source available which links travel patterns such as journey lengths and trip purpose to relevant demographic characteristics (disability).

This assessment considers both positive and negative impacts of the Individual Exemption policy. In some instances, a balanced view is taken between positive and negative impacts, in particular where the impacts are considered to have both a positive and negative impact on one group with protected characteristics. Disabled people have unique needs and movement patterns and experience varying impacts on their mobility as a result of LTNs. While some disabled people may predominantly travel by car, the majority of disabled people use other modes including walking.

Therefore, for most groups the impacts will be a mix of positive and negative impacts depending on the mode of travel generally used by the group. This split between different modes of travel is shown in Table 2 above. It shows, for example, that the proportion of trips walked by disabled people in Islington is roughly the same as the proportion of trips walked by Londoners as a whole (41.2% compared to 42%, respectively). The proportion of trips taken by car, as a driver or passenger, is 25.6% for people with disabilities in Islington and 13.6% for Londoners as a whole. This illustrates that a significant majority (74%) of individuals in Islington who identify as disabled do not travel by car at least once a week.

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Section 1 of this EqIA describes the steps undertaken by the council to understand the impact of the individual LTN exemption policy on people with disabilities in Islington. Through research and continued engagement, the council identified a need for an exemption policy which would encompass individuals who have been substantially disadvantaged by increased journey times/re-routing of trips as a result of the LTNs which fell outside of the Home LTN eligibility criteria. Key learnings from research and engagement highlighted that:

- LTNs can increase journey times for individuals for whom travelling by vehicle is the only option, due to a chronic condition or a disability. Some of these individuals are not eligible under the 'Home' LTN policy or have received an exemption but make regular journeys through the borough that pass through LTNs in which they don't reside; and
- A cohort of individuals who are dependent on car travel and experience considerable difficulty or overwhelming distress from spending increased time travelling in a vehicle or re-routing of trips due to a disability or chronic health condition and require an exemption to limit the amount of time spent in a vehicle. These individuals may or may not have a Blue Badge.

Informed by these findings, the Individual Exemption policy introduces movement through all ANPR camera enforced traffic filters with 'No Motor Vehicles' signage in the borough installed after 2020 for individuals who can provide evidence that the council agrees shows the substantial disadvantage of increased journey times or re-routing of trips.

Islington has one of the lowest proportions of car ownership per household in the country, with 71% of households having no access to a car.³ The Individual Exemption policy has been carefully considered to achieve a fair and reasonable between providing exemptions on a case-by-case basis for substantially disadvantaged individuals whilst preserving the integrity of the LTNs for all including the 52% of disabled Londoners who do not have access to a car and the 74% of people with disabilities in London who do not travel by car as a driver or passenger (see Table 2).

Diluting the benefits of the borough's existing LTNs by allowing a greater number of exempt vehicles may lead to worsening air and noise pollution as well as danger from increased volumes and speeds of traffic, which could hinder uptake of active travel and the council's ambitions to achieve net zero carbon by 2030. Reducing air pollution delivers real health and

³ [Date \(london.gov.uk\)](https://data.london.gov.uk/)

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wellbeing benefits for every resident- especially those with particular disabilities and long-term health conditions.

Exempt vehicles passing through traffic filters where people are not accustomed to encountering through traffic may surprise pedestrians or cyclists and could result in collisions, running counter to the council's objectives of achieving 'Vision Zero' by 2030. Certain groups may be at a higher risk of danger from increased traffic including children, older people, and disabled people. There is a significant disparity in road danger, with disabled people five times more likely to be injured as a pedestrian than non-disabled people, illustrating the benefits for disabled people to reducing the dominance of cars on Islington's streets.

There is also a disparity in the road danger present on minor and main roads. In the UK, a mile driven on a minor road compared to a mile driven on a main road, is twice as likely to kill or seriously injure a child pedestrian, and three times more likely to kill a child cyclist. However, 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 injury numbers or risk on LTN boundary roads.⁴ The people-friendly streets programme has therefore improved the safety of local roads without putting excessive burden on boundary roads.

The operation of the 'Home' LTN policy has meant that approximately 900 Blue Badge holders may now take the most direct route through their home LTN by passing through camera-enforced traffic filters in their local neighbourhood without penalty. This has made travel easier for disabled individuals while ensuring the schemes continue to achieve their traffic reduction goals. The impact of the Home LTN policy on has been monitored, including by listening to resident feedback which informed the action taken in July 2022 to update the exemption by allowing Blue Badge holders to register a vehicle that is not registered to their own address for an exemption.

Given the reasons outlined above, any policy that introduces exemptions for drivers must achieve a measured balance between fulfilling the reasonable adjustment to providing appropriate exemptions for individuals who could be substantially disadvantaged by increased journey times/re-routing of trips and protecting the benefits of the borough's LTNs for all, including a majority of disabled people who do not travel by car.

⁴ [Impacts of 2020 Low Traffic Neighbourhoods in London on Road Traffic Injuries | Published in Findings \(findingspress.org\)](https://findingspress.org/)

3B: Assess the impacts on people with protected characteristics and from disadvantaged groups in the table below.

Please first select whether the potential impact is positive, neutral, or negative and then provide details of the impacts and any mitigations or positive actions you will put in place.

Please use the following definitions as a guide:

Neutral – The proposal has no impact on people with the identified protected characteristics

Positive – The proposal has a beneficial and desirable impact on people with the identified protected characteristics

Negative – The proposal has a negative and undesirable impact on people with the identified protected characteristics

General positive impacts:

Successful implementation of the individual exemption policy should support the continued delivery of streets that accommodate all protected characteristics and types of disability and represent a fairer balance of different modes of travel while acknowledging that a proportion of individuals cannot walk or cycle and must take the most direct route to their destination on the basis of a chronic condition or disability which makes spending extended time in a vehicle or re-routing of trips considerably difficult or causes overwhelming stress. Exemption holders will benefit from more direct journeys, enabling them to pass through camera enforced filters to reduce time spent in a vehicle caused by re-routing of vehicle trips.

The actions as a result of the Individual Exemptions policy are aimed at providing exemptions on a case-by-case basis where there is a need for those who experience a substantial disadvantage due to LTNs. The limited number of exemptions should keep traffic at a level where all residents including those who are disabled continue to feel empowered to make journeys by walking, wheeling, or cycling on less busy roads, and experience the mental and physical health benefits of reduced traffic.

General negative impacts:

C1: Impact on those who travel by private car (taxi or PHV)

The individual exemption is intended to reduce journey times for those who experience considerable physical discomfort or overwhelming psychological distress when travelling by car as a result of a disability or chronic condition. However, the exemption does not apply to those who rely on private hire vehicles or taxis, even if the passenger would otherwise meet the criteria for an individual exemption.

It is not technologically possible to exempt taxis as taxis are not solely used by disabled passengers. Moving forward, the council will work closely with Parking enforcement and other relevant teams to explore technological solutions to address this gap in the exemption to accommodate those individuals who do not own or have access to a vehicle, or someone else to drive them if they are unable to drive themselves due to a disability or condition.

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
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Age	Positive and Negative	<p>Positive:</p> <p>Older people who may have higher instances of disabling conditions leading to eligibility for an exemption will benefit from the ability to travel more directly in or through LTNs.</p> <p>Young people/children who have conditions which mean travelling in a vehicle for increased periods or re-routeing of journeys causes overwhelming psychological distress, or considerable physical discomfort and who qualify for the exemption will be able to travel more directly to school, appointments or care.</p> <p>Negative:</p> <p>The introduction of the Individual Exemption policy is expected to only minimally increase traffic volumes, however any increase in traffic volumes could impact those who use filtered streets to walk, wheel, cycle or play, particularly children and older people who do not drive.</p> <p>For older people who are more likely to have mobility issues, the presence of through traffic in an area where the road is typically filtered and street users are not accustomed to cars could make streets less safe and create an</p>	<p>The Individual Exemption policy states that exemption holders must approach traffic filters with caution when in their vehicles to minimise risk to other street users, particularly those with protected characteristics.</p> <p>The Individual Exemption policy is preceded by the 'Home LTN' policy, which currently exempts</p>
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Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
		intimidating environment, hindering the objectives of low traffic neighbourhoods.	approximately 900 Blue Badge holders across the borough. The Home LTN exemption was introduced on a rolling basis from December 2021 meaning that residents and road users would have become accustomed and adapted to exempt traffic travelling through LTN filters and any attendant increase in traffic. It is expected that an even smaller increase in volumes created by the individual exemption will be responded to similarly.

Disability	Positive and Negative	<p>Positive:</p> <p>There is a higher proportion of people in Islington who identify themselves as being disabled (16%, compared to the London average of 14%- see Table 1). For disabled people, traffic reduction can enable easier or more pleasant journeys in addition to increasing independence, decreasing the risk of danger from traffic and benefiting physical and mental health. In residential areas, those with cognitive disabilities could benefit from reduced levels of noise pollution, supported by the neighbourhood walking and cycling improvements and the removal of through-traffic. The Individual Exemption policy aims to ensure that these benefits are preserved while delivering reasonable adjustments for individuals who are disabled and/or have chronic conditions.</p> <p>The exemption is designed to benefit those who experience substantial disadvantage as a result of LTNs due to a disability or chronic health condition. If evidence demonstrates that an individual's disability/condition makes it difficult for an individual to spend time in a car for physical or psychological reasons, then the</p>	
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		<p>exemption will deliver benefits by reducing journey times and preventing re-routing of trips.</p> <p>An Islington Council-issued Blue Badge is a mandatory requirement for the Home LTN exemption. The Individual Exemption recognises that not all disabled individuals have a Blue Badge. There may be residents who experience difficulty travelling comfortably by car as a result of a disability or chronic condition who are not Blue Badge holders. By removing this eligibility requirement, the Individual Exemption recognises a broader range of disability and/or impairment.</p> <p>Disabled individuals who are eligible for the Individual Exemption and do not have their own vehicle or are unable to drive themselves may nominate a carer's vehicle under the policy. This could be a formal (professional) carer or an informal carer (friend or family member). The exemption policy is flexible in that it does not require that the exempt vehicle to belong to the permit holder, albeit that the permit holder must be in the nominated vehicle (as a driver or passenger) when the vehicle is passing through a camera-enforced traffic filter to avoid a penalty charge notice.</p>	
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		<p>Negative:</p> <p>Some individuals who are disabled (including Blue Badge holders) and experience some negative impacts caused by LTNs in common with the wider population, such as increased inconvenience of car travel will not benefit from an exemption under the policy. The individual exemption does not cover disabilities that do not lead to an individual's considerable physical discomfort or overwhelming psychological distress associated with travelling in a vehicle, even if they are debilitating in other ways.</p> <p>As with the Home LTN policy, disabled individuals who do not have access to a vehicle (either their own or someone else's that can be registered under the exemption) or someone else to drive them if they are unable to drive themselves due to a disability or condition and rely heavily on taxis or other PHV for transport will not be accommodated under the individual exemption as it is not technologically feasible to exempt public taxis only when carrying disabled passengers. This applies even if the passengers would be eligible for an individual exemption.</p>	<p>For those individuals who are disabled but who are not eligible under either the Home LTN or individual exemption policy, the London Taxicard Scheme offers subsidised travel in licenced taxis and private hire vehicles to London residents with serious mobility impairments or who are severely sight impaired. This could offset some of the increase in costs resulting from slightly longer routes as a result of the LTN schemes.</p> <p>Although taxis and private hire vehicles are not currently exempt under the proposed policy, the council will work with Transport for London and London Councils to explore technological solutions to address this in the future to accommodate those individuals who do not own or have access to</p>
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		<p>The council acknowledges that while taxis or PHVs are essential for some residents, this is a limited negative impact as data shows only 3.2% of trips taken by disabled people in Islington are in taxis or PHVs (this is shown in Section 2, Table 2).</p> <p>The evidence requirements required for an exemption may be challenging for some individuals to produce in support of an application. Some disabled individuals may not have up-to-date evidence, or evidence that specifically can demonstrate one's inability to travel comfortably by car as a result of a disability or chronic condition.</p>	<p>a vehicle. This will depend on the technological resource and capability of the relevant enforcement teams.</p> <p>The evidence requirements of the Individual Exemption policy were informed by the Systra report which outlined a list of example evidence emerging from stakeholder engagement and Systra's professional knowledge. PFS officers sought feedback on Systra's evidence list from relevant council teams including the Blue Badge team, Accessible Community Transport and Safeguarding and Family Support. The evidence list was also shared among a team of NHS Occupational Therapists for additional input. The council will assess feedback on the evidence requirements from residents/road</p>
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		<p>Disabled people who do not travel by private vehicle, taxi or PHV could be impacted by the individual exemption policy if local traffic rises. This could make streets less safe and create an intimidating environment for people who do not rely on vehicles for their mobility, ultimately hindering the objectives of the LTNs. Disabled people are five times more likely to be injured as a pedestrian than non-disabled people.⁵</p> <p>Carers of disabled people who do not themselves meet the criteria and may be experiencing increased journey time as a result of LTNs will not be eligible to apply for individual exemption, which could lead to disruption in caring routines for disabled people. This may particularly apply to professional</p>	<p>users as part of the following the trial implementation of the policy.</p> <p>The Individual Exemption policy states that exemption holders must approach traffic filters with caution when in their vehicles to minimise risk to other street users, particularly those with protected characteristics.</p> <p>Limiting the range of the exemption to those who are substantially disadvantaged by lengthened/re-routed journeys as a result of considerable physical discomfort or overwhelming psychological distress should help to limit the increase in traffic volumes seen within LTNs.</p> <p>The policy allows exempt individuals to nominate a vehicle for the exemption that is not their own, which could include a professional or informal carer's vehicle.</p>
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Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
		<p>carers who are visiting several patients via chained trips throughout an LTN or multiple LTNs within the borough.</p> <p>The Individual Exemption policy does not require applicants to live in Islington however the policy is intended for those who regularly access Islington's streets (which could include those who reside in a neighbouring borough but regularly travel to or through Islington). Disabled individuals who are infrequent visitors to Islington would not be exempt under the policy.</p>	<p>An analysis of journey data by Steer consultants showed that shorter car trips are proportionally more impacted by LTNs than medium or long journeys.⁶ Therefore, disabled individuals who are visiting Islington on an infrequent basis, with their journey originating outside the borough would not experience a disproportionate increase in journey time compared to those who start their journeys from within the borough.</p>

⁵ [Disabled and low-income pedestrians at 'higher risk of road injury' \(roadsafetygb.org.uk\)](https://roadsafetygb.org.uk)

⁶ People Friendly Streets - Journey Lengths and Times Analysis (islington.gov.uk)

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Race or ethnicity	Neutral	No specific impacts identified	N/A
Religion or belief (include no faith)	Neutral	No specific impacts identified	N/A
Gender and gender reassignment (male, female, or non-binary)		No specific impacts identified	N/A

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Maternity or pregnancy	Positive	Positive: Mothers who act as primary caregivers for severely disabled children, or children who have conditions including psychological conditions which impact a child's ability to spend time in a vehicle for prolonged periods will benefit from more direct routes through the borough as a result of the Individual Exemption policy.	
Sex and sexual orientation	Neutral	No specific impacts identified	N/A

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Marriage or civil partnership	Neutral	No specific impacts identified	N/A
Socio-economic status (To be treated as a Protected Characteristic under section 1 of The Equality Act 2010)	Negative	Negative: Lower income households are less likely to have access to private vehicles than higher income households. For disabled individuals, this could mean that for journeys where they are not eligible for services such as Accessible Community Transport or SEND Vehicles, they would not be able to register a vehicle to benefit from the exemption.	Where possible, the PFS team will work with parking enforcement and other relevant council services moving forward to allow for single journey taxi exemptions as the next stage in the LTN/LN exemption process. This will progress as technological and resourcing capabilities allow.

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Other - Digitally excluded people	Negative	<p>Negative: As a result of not having access to devices such as personal computers or mobile phones and/or access to internet connectivity there is a risk of digital exclusion associated with learning about the trial implementation of the Individual Exemption policy and applying for an exemption.</p> <p>The Individual Exemption application will be digitised and information surrounding the policy including announcement of the trial, and Frequently Asked Questions will be available online at the council's webpages.</p>	<p>The council will issue a press release ahead of the trial in order to try to secure coverage in non-digital formats.</p> <p>Individual exemption applications will be available in a hard copy (paper) format for those who cannot access the online version of the form.</p> <p>Telephone support will also be available by calling the Blue Badge Team, with facility to leave a call-back request, if people are having difficulty completing the exemption application or want to request more information about the policy.</p>

4. How do you plan to mitigate negative impacts?

Please provide:			
<ul style="list-style-type: none"> An outline of actions and the expected outcomes Any governance and funding which will support these actions if relevant 			
Negative Impact	Action	Expected outcome	Governance and funding
<p>More inconvenient vehicle trips</p> <p>More costly trips if taxis or private hire vehicles are relied on for some people falling into protected characteristics groups such as age, disability and parental status.</p>	<p>The London Taxicard Scheme offers subsidised travel in licenced taxis and private hire vehicles to London residents with serious mobility impairments or who are severely sight impaired.</p> <p>For those in this category who are not eligible under the individual exemption policy, the London Taxicard scheme could offset some of the increase in costs resulting from slightly longer routes as a result of the LTN schemes.</p> <p>The council will work to promote uptake of this scheme amongst potentially affected groups.</p>	<p>Increased use of scheme amongst target participants</p>	<p>Transport Projects and people-friendly streets team</p> <p>London Councils</p>

Please provide:

- An outline of actions and the expected outcomes
- Any governance and funding which will support these actions if relevant

<p>The Individual Exemption policy does not include taxis and private hire vehicles.</p>	<p>As a next step in LTN exemptions, the council will explore technological solutions to address how taxis can be exempt from specific journeys in order to accommodate those individuals who do not own or have access to a vehicle, or someone else to drive them if they are unable to drive themselves due to a disability or condition.</p> <p>A possible solution could include "Real time" whitelisting which would allow the user to upload the registration of a taxi/PHV whilst travelling and receive an immediate exemption. At this time the council does not have access to the technology that would allow this.</p>	<p>If implemented, these actions would result in the exemption policy being extended to include a greater number of trips by individuals who would be eligible under the policy's criteria but do not have access to a vehicle, or someone else to drive them if they are unable to drive themselves due to a disability or condition and rely on taxis/PHV.</p>	<p>Transport Projects and people-friendly streets team</p> <p>Transport for London</p> <p>London Councils</p>

Please provide:

- An outline of actions and the expected outcomes
- Any governance and funding which will support these actions if relevant

	<p>The PFS team will work with relevant council services moving forward to allow for single journey taxi exemptions as the next stage in the LTN/LN exemption process. This will progress as technological and resourcing capabilities allow.</p>		
<p>Other: Traffic on local LTN streets rises as a result of the Individual Exemption policy.</p> <p>Benefits of the LTN are diluted, with worsening air and noise pollution, traffic danger, which will hinder uptake to active travel and the council's ambitions to achieve net zero carbon by 2030. Exempt vehicles might take people walking, wheeling or</p>	<p>Monitoring traffic levels after implementation of the exemptions to ensure traffic is kept at low levels. If traffic increases significantly, a review of exemptions would take place.</p> <p>Policy states that exemption holders must approach traffic filters with caution when in their vehicles to minimise risk to other street users, particularly</p>	<p>Expected that any traffic increases on local streets will be minimal due to limited number of individual exemptions.</p>	<p>Transport projects and people-friendly streets team</p>

Please provide:

- An outline of actions and the expected outcomes
- Any governance and funding which will support these actions if relevant

cycling by surprise, which could result in collisions.

those with protected characteristics.

This would impact in particular protected groups such as age, disability and parental status.

5. Please provide details of your consultation and/or engagement plans.

Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

To inform the Individual Exemption policy, the council jointly commissioned (along with the London Boroughs of Hackney, Haringey and Enfield) research by SYSTRA Ltd (Systra). Systra produced 'North London Boroughs LTN Exemption Policy Review' (July 2022) which provided recommendations for consideration on possible exemption policies and the processes for implementing these policy recommendations.

The evidence collected by Systra to develop the recommendations which helped inform the Individual Exemption policy included a series of stakeholder interviews with individuals with various mobility needs including mobility impairments and parents and carers of children with special education needs and disability. This engagement identified that some disabled

Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

individuals experience adverse impacts associated with longer journey times and/or re-routing of trips as a result of LTNs.

The policy development also took into account internal input from council services including Policy and Equity, Safeguarding and Family Support and the Blue Badge team. Externally, an Occupational Therapist was also asked to provide feedback on the needs for eligibility and the medical evidence requirements.

It is not proposed to hold a formal public consultation on the Individual Exemption policy as public feedback will be gathered from the residents during the policy's trial implementation period. Holding a public consultation in advance of implementing the policy would mean that the individual exemption would not be implemented until a later date, delaying its benefits for eligible individuals.

The Individual Exemption policy will instead be implemented on a trial basis from January 2023. The policy will be trialled as it is set out in section 3 of the Joint Board decision report that this EQiA accompanies. During this time, residents and/or road users will be invited to submit feedback via an online form.

Following the trial of the Individual Exemption policy, an Executive decision will be made on whether to adopt the policy in its current form or with amendments in response to submitted feedback during the trial and/or experience of its operation. The results of the feedback will be published as part of the Executive report.

6. Once the proposal has been implemented, how will impacts be monitored and reviewed?

Please provide details in the table below.

Action	Responsible team or officer	Deadline
The number of Individual Exemption permits issued will be monitored	Transport Projects and people-friendly streets team Blue Badge	Ongoing
Feedback from residents including with protected characteristic (both eligible and ineligible under the policy criteria) received during the trial will be monitored assessed and published as part of the Executive report which considers the adoption of the Individual Exemptions policy. Changes may be made to the policy on the basis of written feedback received during the trial.	Transport Projects and people-friendly streets team	Trial to run for approximately three months from early January 2023. Results to be assessed after the trial runs for at least three months.
Traffic levels in existing LTNs will continue to be monitored to inform final decisions on making schemes permanent. Traffic in future liveable neighbourhoods will be monitored in accordance with monitoring strategies and practice at the time.	People-friendly streets team	Ongoing

Please send the completed EQIA to equalities@islington.gov.uk for quality checking by the Fairness and Equality Team. All Equality Impact Assessments must be attached with any report to a decision-making board and should be made publicly available on request.

This Equality Impact Assessment has been completed in accordance with the guidance and using appropriate evidence.

Member	Name	Signed	Date
Staff member completing this form	██████████ Project Manager, Transport Projects & people-friendly Streets	██████████	14 December 2022
Fairness and Equality Team	██████████	██████████	4 November 2022
Director or Head of Service	██████████	██████████	14 December 2022