

# Appendix 2: Individual Exemptions Trial Report

## 1. Introduction

- 1.1. The People-friendly streets Individual Exemption permit was introduced on a trial basis from January 2023 in all existing Islington Council low traffic neighbourhoods at camera-enforced filters with 'No Motor Vehicles' restriction signage introduced after 2020. The December 2022 [delegated decision](#) under which the trial was implemented stated that a final decision on adopting the policy would have regard to feedback submitted during the trial period and/or experience of its operation. Section 2 and Appendix 1 and 2 of this report set out the results of the engagement that was undertaken as part of the trial including the council's response to the main issues raised. Section 3 sets out details of the trial experience, including monitoring and issues that emerged during the trial leading to recommendations for proposed changes to the policy.

## 2. Engagement

### How feedback was collected

- 2.1 Feedback on the Individual Exemption policy was collected through an online survey that was made available via the Individual Exemptions webpage at: [Individual Exemption FAQs | Islington Council](#) from 3 January to 23 June 2023. The feedback form was made up of a mixture of closed (multiple choice) and open (free text box) questions. All questions in the long form and short form survey were optional and respondents were free to skip any questions on the survey.
- 2.2 A short form survey was also available, in response to feedback from the Islington Travel Accessibility Advisory Group (ITAAG) during the survey development stage, which suggested that individuals with learning disabilities may find a long form survey onerous or difficult to follow. The short form survey had one open text box asking respondents to share their views on the policy along with optional demographic questions.
- 2.3 Both surveys were open to all residents and road users, and respondents did not need to apply or be eligible for an Individual Exemption to respond to the survey.

### Who responded to the Individual Exemption policy feedback survey

- 2.4 30 respondents filled in the standard feedback survey, and one respondent filled in the "short form" feedback survey but did not respond to the main text box.
- 2.5 As shown in Appendix 1, 11 of 31 survey respondents said they were disabled and 10 were not, and 12 respondents chose "prefer not to say" or skipped this question. Nine respondents said they were Blue Badge holders. Seven respondents said they were a carer

for a disabled person, nine were not and 15 respondents chose “prefer not to say” or skipped this question.

- 2.6 Respondents were asked if they had applied for an Individual Exemption permit at the time of responding to the survey. Only three respondents said they had applied and 16 said they had not, with the remainder skipping the question. 11 of the respondents who had not applied for an Individual Exemption said they planned to do so in the future and six did not intend to. The remaining respondents skipped this question.
- 2.7 It is notable that when responding to the survey, the majority of respondents had not in fact applied for an Individual Exemption and therefore would not have had experience of either the application process, or the benefits of the permit itself.
- 2.8 Moreover, 24 out of 31 responses were submitted on or before 24 January 2023 shortly after the trial was launched and at a time when only two Individual Exemption permits had been issued.
- 2.9 The most selected answer for respondents’ main mode of transport was car (10 respondents), followed by taxi, public transport and bicycle (2 respondents each).

## What we asked about the Individual Exemption policy and what people told us

- 2.10 To understand how various elements of the policy and the application process were working for users, we asked a number of closed (three) and open-ended/ free text box (nine) questions, as set out below alongside a summary of the feedback received. This section includes a summary of the main issues raised in free text feedback and officer responses, and Appendix 2 includes a full list of the comments received.
- 2.11 Responses to each open text question have been grouped by theme. In some instances, respondents would use the open text box to raise issues relating to the people-friendly streets programme generally, or to comment on aspects of the Individual Exemption policy that were not the focus of the question. These responses have been noted as ‘response does not relate to the question – other issue raised.’ Where it was not clear what the respondent was trying to communicate in the open text response, the response has been categorised as ‘response unclear.’

### 2.12 Feedback on clarity of policy

**Question 1 (closed question):** Respondents were asked if they agree with the statement that “the Individual Exemption Policy (IEP) is clear and easy to understand.”

The majority (18) respondents strongly agreed or agreed the policy was easy to understand.

**Question 2 (open question/ free text box):** Respondents were asked to provide details of which aspects of the policy they find unclear or difficult to understand, if any, and why.

14 respondents did not answer this question and 2 respondents said ‘No’ in the free text box. The remaining 14 responses have been categorised into five themes. (Note that some

responses covered more than one point, and therefore have been counted under more than one theme hence a total number of responses greater than 14).

Theme	Number of mentions
Difficult to understand how application will be assessed	5
Response does not relate to question - other issue raised	5
Policy is confusing / hard to understand (general)	4
Difficult to understand access/enforcement (as permit holder)	2
Response unclear	1

Table 1: Question 2 responses, by theme

### 2.13 Feedback on the eligibility criteria

Question 3 (open question/ free text box): Respondents were asked if they have any comments on the eligibility criteria as set out in the IEP.

11 respondents did not answer this question and four respondents said 'No' in the free text box. The remaining 15 responses have been categorised into six themes. (Note that some responses covered more than one point, and therefore have been counted under more than one theme hence a total number of responses greater than 15).

Theme	Number of mentions
Response does not relate to question – other issue raised	4
Carers/family should be eligible for exemption	3
Concerns over assessment of eligibility criteria	3
Eligibility criteria is too broad	2
Eligibility criteria is too narrow	2
Response unclear	2

Table 2: Question 3 responses, by theme

### 2.14 Feedback on the indicative list of conditions

Question 4 (open question/ free text box): Respondents were asked if there were any conditions not listed that should be included in the exemption. NB the policy notes that the list of conditions provided is indicative only. A response to all suggestions can be found at Table 10 and all responses that indicate conditions for inclusion to Question 4 are listed in full at Appendix 2.

<b>Response</b>	<b>Number of mentions</b>
Bowel conditions (Crohn's Disease, IBS)	3
Arthritis/joint pain	3
Response does not relate to the question – other issue raised	3
Wheelchair users and mobility issues	2
Chronic pain	2
Fibromyalgia	2
Mental health issues	1
Learning difficulties	1
Amputees	1
Response unclear	1

Table 3: Question 4 responses

## 2.15 Feedback on the scope of traffic filters that the Individual exemption applies to

Question 5 (open question/ free text box): Respondents were asked if they have any comments on the scope of traffic restrictions that the Individual Exemption policy applies to. The survey question included the information that "Individual exemptions apply to all camera enforced filters with "no motor vehicle" restriction signage in current and upcoming people-friendly streets neighbourhoods and liveable neighbourhoods in Islington (not including School Streets traffic filters).

19 respondents did not answer this question and two respondents said "no" in the free text box. The remaining nine responses have been categorised into four themes. Note that some responses covered more than one point, and therefore have been counted in more than one theme hence a total number of responses greater than nine.

<b>Theme</b>	<b>Number of mentions</b>
Response does not relate to question – other issue raised	4
The scope of the Individual Exemption policy is unclear	3

Scope of the restrictions is too stringent	2
Support for the scope of the restrictions	2

Table 4: Question 5 responses, by theme

Question 6 (open question/ free text box): Respondents were asked in an open response/free text format if they have any comments on the number of vehicles that are exempt for permit holders. The survey question included the information that “Individual exemptions apply to a single vehicle per exemption holder, which may be the applicant’s own or belong to another person. The exemption holder must be in the nominated vehicle, either as driver or passenger, when it passes through a traffic filter.”

16 respondents did not answer this question and three respondents said “no” in the free text box. The remaining 11 responses have been categorised into six themes.

Theme	Number of mentions
Concerns about enforcement	3
Support the policy’s position on vehicle exemptions	2
Taxis/PHV/Car club vehicles should be included	2
Response does not relate to question – other issue raised	2
Permit holders should be allowed to exempt multiple vehicles	1
Response unclear	1

Table 4: Question 6 responses, by theme

## 2.16 Feedback on the clarity and ease of use of application form and process

Question 7 (closed question): Respondents were asked whether or not they agreed that it was easy to fill out the Individual Exemption application form and that it was in a format that was clear and easy to use.

Of 13 respondents to this question, four strongly agreed with this statement, four neither agreed nor disagreed, and four strongly disagreed. One respondent agreed with the statement, and 17 did not respond.

Question 8 (open question/ free text box): Respondents were asked to “provide details to support their answer to Question 7 or provide any further comment on the Individual Exemption application process.”

Eight respondents used the free text box. These responses have been categorised into the below themes.

Theme	Number of mentions
Application difficult to use / inconvenient	3
Response does not relate to the question – other issue raised	3
I did not apply for the exemption	2

Table 5: Question 8 responses, by theme

## 2.17 Feedback on evidence requirements

Question 9 (open question/ free text box) Respondents were asked to identify any additional types of evidence documents that should be included on a list of documents that could be used to demonstrate eligibility for an Individual Exemption, as well as any other comments on the evidence requirements.

21 respondents did not answer this question. The nine responses have been categorised into five themes.

Theme	Number of mentions
Evidence requirements are too onerous for applicant	3
Response does not relate to the question – other issue raised	2
Evidence from a GP should be sufficient	2
Concerns over who is assessing evidence	1
P.I.P Entitlements are sufficient for exemption	1

Table 6 Question 9 responses, by theme

## 2.18 Feedback on the impact of the trial

Question 10 (closed question): Respondents were asked if they do hold an Individual Exemption permit, whether it has reduced journey times or eliminated the need to re-route trips while travelling through Islington.

Half of respondents (15 out of 30) said they were not permit holders, two said that the permit has not reduced journey times, two selected 'I don't know' and 11 respondents did not answer this question.

Question 11 (open question/ free text box): Respondents were asked if they have any comments regarding the impact of the Individual Exemption policy on their life.

21 respondents did not answer this question. The nine responses have been categorised into five themes.

Theme	Number of mentions
Mostly positive impact	3
Not helpful /negative impact	2
Concern exemptions will increase traffic in LTNs	2
Response unclear	2

Table 8: Question 11 responses, by theme

## 2.19 Further feedback on the policy and trial

Question 12 (open question/ free text box): Respondents were asked if they have any further comments on the Individual Exemption or the trial implementation process.

16 respondents did not answer this question. The 14 responses have been categorised into five themes.

Theme	Number of mentions
Response does not relate to the question, other issue raised	5
IEP is not helpful for all disabled people (incl. Blue Badge holders)	3
Positive/ support for Individual Exemption policy as implemented	2
Concern exemptions will increase traffic in LTNs	2
Concerns with application process	2

Table 9: Question 12 responses, by theme

## Responses to main issues raised

2.20 Table 10 below sets out the main issues raised in response to combined feedback received to the open questions in the survey alongside the council's response. In some instances the issues were raised in response to multiple open questions.

Issue raised in feedback	Officer response
<p>Concern that evidence requirements /application process is too rigid/onerous for applicant.</p>	<p>Evidence is needed to assess the individual circumstances which is an implicit part of the case-by-case exemption.</p> <p>An indicative list of evidence that may be suitable to support an application is provided on the main webpage <a href="#">FAQ</a>. Evidence could include evidence of relevant benefits received, or care plans from social care teams as well as evidence from a GP such as Patient Summary or Summary Care records, if these are sufficient to demonstrate eligibility for an Individual Exemption.</p> <p>The application process was developed to be as streamlined as possible to reduce the burden on applicants. For example, the council has eschewed introducing a more complex process requiring submission of journey details to limit the number of traffic filters that each applicant would be exempt from in favour of the simplified approach (exempting applicants who meet the eligibility criteria to all applicable LTN/LN traffic filters)</p>
<p>Concern that policy does not benefit residents who rely on taxis or car share for travel</p>	<p>All addresses in the borough remain accessible by vehicle so a resident would not need to be exempt to be driven to their home. The only thing that may change is the route they have to take.</p> <p>It is acknowledged that the policy is unable to provide exemptions for taxis and private hire vehicles, because these vehicles are not used exclusively by people that are eligible for an exemption and it is not technologically possible to exempt taxis for the purpose of trips with a particular passenger, even if that passenger would otherwise meet the criteria for an Individual Exemption. The council will continue to work with the relevant teams and services to investigate the feasibility of exemptions for taxis and private hire vehicles used by disabled individuals as a next phase</p>



Issue raised in feedback	Officer response
	in the development of the wider exemptions for disabled people.
<p>Concern that the exemption does not apply to a wider group (all Blue Badge holders, all disabled residents, and/ or all LTN residents)</p>	<p>See the People-friendly streets <a href="#">FAQ</a> for the council’s position and rationale on exemptions for residents. Exemptions are not provided to all residents as all PFS schemes have been designed so that all residents can access their homes without the need for an exemption. The only thing that may change, in some circumstances, is the route they have to take.</p> <p>Low traffic neighbourhoods were initially implemented with only limited exemptions to include emergency services, refuse collection and some council vehicles such as Accessible Community Transport (ACT). Following feedback from organisations representing disabled people and individual residents’ correspondence, the council amended its position on exemptions and introduced the ‘Home’ LTN exemption in the October 2021 people-friendly streets <a href="#">executive report</a>.</p> <p>The Individual Exemption policy is intended to complement the ‘Home’ LTN policy for Blue Badge holders. It is intended to make a reasonable adjustment in line with the Equality Act to enable a cohort of individuals who can demonstrate that they are placed at substantial disadvantage as a result of LTNs, to undertake journeys that would not otherwise be possible or would only be possible with considerable difficulty or overwhelming distress.</p> <p>Although Blue Badge holders may apply for exemption, they are not automatically eligible for the Individual Exemption. Blue Badges are awarded based on difficulties a person has walking short distances to access or leave a</p>

<b>Issue raised in feedback</b>	<b>Officer response</b>
	vehicle, while the criteria for an Individual Exemption assesses an individual's ability to travel in a vehicle.
<p>Concern that too many exemptions will dilute the impacts of the LTN /exemption system may be abused</p>	<p>It is considered that the policy has/ will not unacceptably harm the integrity of the LTN and future liveable neighbourhood schemes for all who benefit from them. This is supported by the relatively low number of permits issued to date (79 as set out in Section 3.1 below). Additionally, final monitoring of each LTN where the Blue Badge exemption was introduced during the trial concluded that the Blue Badge exemption has not had a significant impact on local traffic volumes within or on the boundary roads of LTNs. As there are significantly fewer Individual Exemption permit holders (some of whom are also Blue Badge holders) this also supports the position that the exemption is not generating a significant number of trips.</p> <p>While anyone may apply for an Individual Exemption, applications must demonstrate with evidence that they meet the eligibility criteria. It is expected that those who are eligible for an exemption will be mostly making journeys that could not be taken by public or active transport.</p>
<p>Concern that the application process is difficult for those with visual impairments/are non-digital</p>	<p>Paper copies of the application form are made available and can be sent to applicants by post, if requested by telephone. Telephone support is also available for applicants who have questions about the Individual Exemption.</p>
<p>Concern that the exemption applies to only one vehicle per exemption holder</p>	<p>The exemption is considered to achieve a fair and reasonable balance between providing exemptions on a case-by-case basis and preserving the integrity of LTNs for all including a majority of disabled people who do not travel by vehicle as driver or passenger. The exemption only applies to a</p>

Issue raised in feedback	Officer response
	<p>single vehicle so as to not dilute the benefits of the LTNs for all, including disabled people. If the vehicle the permit holder regularly use changes – due to temporary repairs or the purchase of a new vehicle – they may be able to switch the exemption to their new/temporary vehicle. As this must be done manually, the council does not have the resource to make these changes on a regular basis.</p> <p>The vehicle nominated by the applicant does not need to be the applicant’s own vehicle and could be that of a formal carer, friend or family member. However, the vehicle should be the permit holder’s primary mode of travel.</p>
<p>Confusion about which filters/schemes the exemption applies to</p>	<p>The Individual Exemption permit applies to all camera-enforced traffic filters where signs indicate ‘No Motor Vehicle’ restrictions (pictured below) apply and display a sign plate reading ‘Except permit holders’ followed by an LTN zone reference in all current and upcoming low traffic neighbourhoods and liveable neighbourhoods in Islington. This information was provided within the survey itself and on the main webpage <a href="#">FAQ</a>.</p>
<p>Confusion over how to demonstrate ‘considerable difficulty’ or ‘substantial distress’ through provision of evidence.</p>	<p>The words are to be given their ordinary or natural meaning within the context of the policy.</p>
<p>Confusion about how the requirement for the exemption holder to be in the vehicle will be enforced</p>	<p>It is not currently possible to enforce this requirement, the onus is on the exemption holder/ owner of the nominated vehicle to abide by the requirement that the exemption holder be in the vehicle (as a driver or a passenger) when it passed through a traffic filter.</p>

Issue raised in feedback	Officer response
Confusion about how to prove need for the exemption	Information was provided within the survey itself to accompany the question and is available on the main webpage <a href="#">FAQ</a> .
Suggestions for conditions to be added to indicative list of conditions for eligibility (Question 4): Bowel conditions (including Crohn's and IBS, arthritis/joint pain, wheelchair users and mobility issues, chronic pain, fibromyalgia, mental health issues, learning difficulties, amputees)	<p>Some of the conditions suggested (e.g. mental health issues, Autism Spectrum Disorder) are noted on the list of possible conditions which may merit an exemption.</p> <p>Other suggestions including Crohn's, IBS, Bowel Problems, Chronic Pain, Fibromyalgia, Arthritis and muscular tendopathy have been considered, and the council does not propose adding them to the list which includes an existing general category for other ongoing conditions that mean that the applicant would meet the eligibility criteria (with the same type of evidence requirement)</p> <p>Wheelchair use, as suggested by one respondent does not make an applicant eligible per se, however individuals who use wheelchairs due to a condition that can be shown to lead to considerable difficulty or overwhelming distress when travelling by vehicle may be eligible for an Individual Exemption.</p>

Table 10: Responses to main issues raised in all open question feedback

2.21 No changes are proposed to be made to the Individual Exemptions policy on the basis of the consultation feedback.

## 3. Operational Experience of the trial

### Trial Monitoring

- 3.1 During the initial months of the trial the council received a high volume of telephone and email enquiries relating to the Individual Exemption. This included approximately 260 emails (sent to [pfsbluebadge@islington.gov.uk](mailto:pfsbluebadge@islington.gov.uk)). Phone enquiries were not logged.
- 3.2 Since applications for the Individual Exemption opened, 228 applications have been made online and 79 exemption permits have been issued. 149 applications for permits have been

rejected. Of the total number of permits issued:

- 79 were to Islington residents.
- 77 were to Blue Badge holders
- 20 permits have been issued to children (permit attached to a parent or carer's vehicle).
- 31 are for physical conditions only.
- 27 are for psychological conditions only.
- 21 are for combination of physical / psychological conditions (including instances where a physical condition may have psychological impacts e.g. Crohn's disease).

3.3 Between 5 January 2023 and March 2024, approximately 35 applicants were asked to provide further evidence to support their application / review of their application for an Individual Exemption. Of these, 17 had applications refused on the basis that no further evidence was submitted, or the evidence did not demonstrate that they met the eligibility criteria. No review cases were referred to an external body.

## Operational experience

3.4 During the trial, in the light of experience of one application, the guidance (FAQ) accompanying the Individual Exemption policy on the website was amended to provide further clarity on the existing provision set out in the FAQ that in the case of applicants from outside the borough, the policy is intended for people who regularly access Islington's streets. The amendment to the guidance indicates suggested ways to demonstrate this including proof of regular appointments located in Islington, or proof of enrolment in a school located in Islington. It is recommended that the main wording of the policy be amended to reflect this as shown in Appendix 1 of the Executive report to which this document is appended.

3.5 The policy regards a chronic condition as referred to in the eligibility criteria as lasting for longer than one year, whereas the standard renewal period for the Individual Exemption was set at three years so as to reduce the administrative burden for the exemption holders whose conditions were likely to endure for much longer or be permanent and to be consistent with the Blue Badge review period.

3.6 Based on experience of a small number of recent applications, it is considered that there is justification to introduce discretion to issue Individual Exemption permits for one year in cases where applicants meet the eligibility criteria, but their conditions or need for an exemption may not necessarily endure for longer than one year. Possible examples of cases which may lead to issue of a one-year Individual Exemption permit may include: treatments for a condition which may improve in one year or less (e.g. some cancer treatments); diagnosis of a new but treatable condition where treatment may relieve impacts of the condition such as Crohn's disease; post-operative conditions where long-term prognosis is

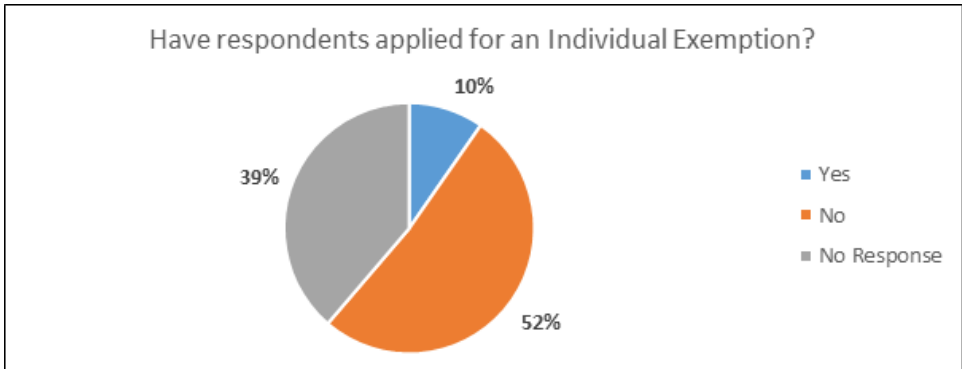
unknown; and distress while establishing an effective dosage or treatment prescription for psychological conditions.

## Appendix 1 – graphs showing results of the closed questions.

Note that for the purposes of this report responses to the closed questions on demographic information from the long form and short form survey have been combined, as these questions were identical across both surveys. All questions were optional on both surveys.

### Questions about status of Individual Exemption permit

**Have respondents applied for an Individual Exemption?**

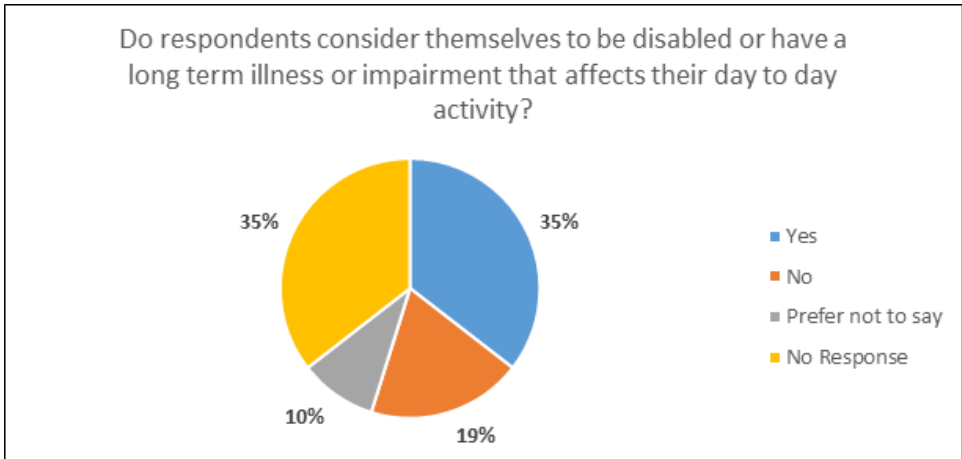


**Will respondents be applying for an Individual Exemption in the future?**

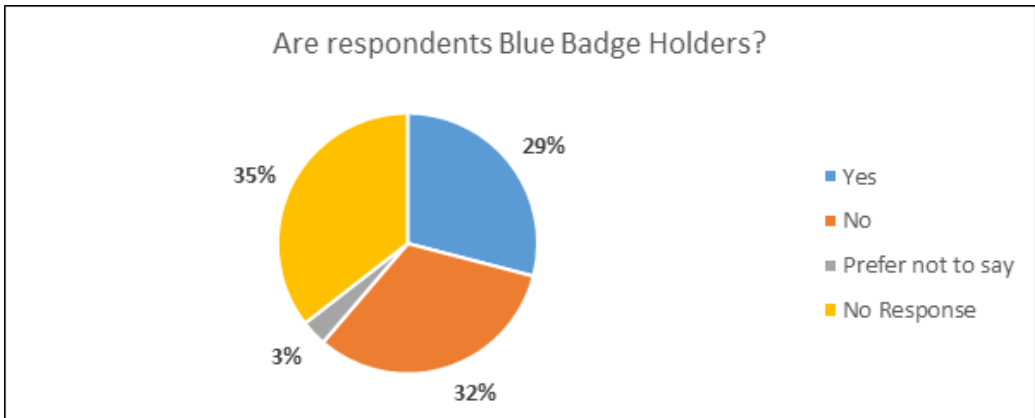
**Questions about disability and/or caring responsibilities**

Respondents were asked optional questions about disability, Blue Badge status and caring responsibilities.

**Do respondents consider themselves to have a disability?**

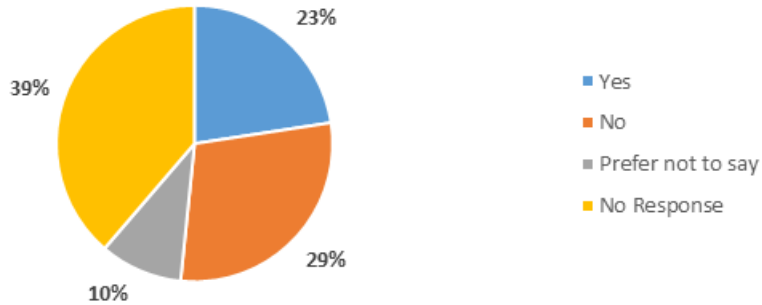


**Are respondents Blue Badge holders?**



**Are respondents a carer for someone who is disabled, or has a long-term illness or impairment?**

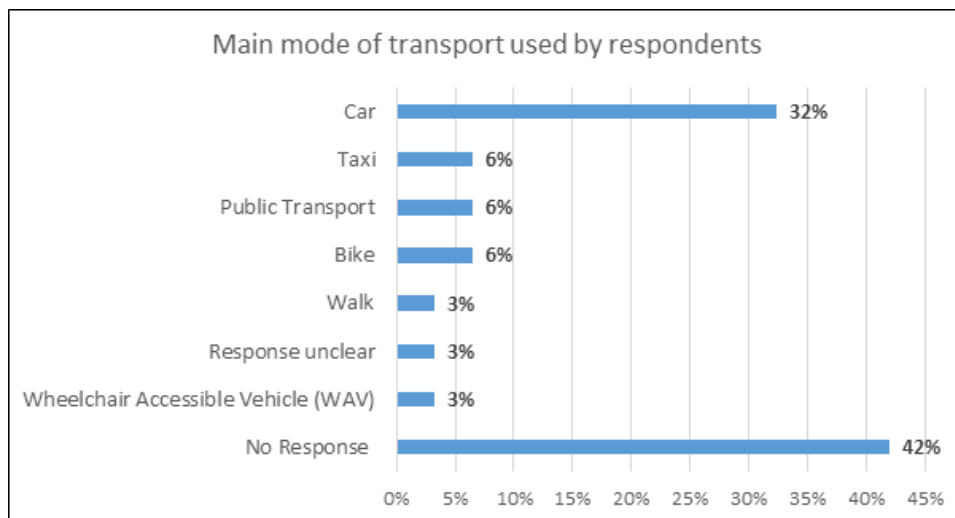
Are respondents a carer for someone who is disabled or has a long term illness or impairment?



## Questions about travel patterns

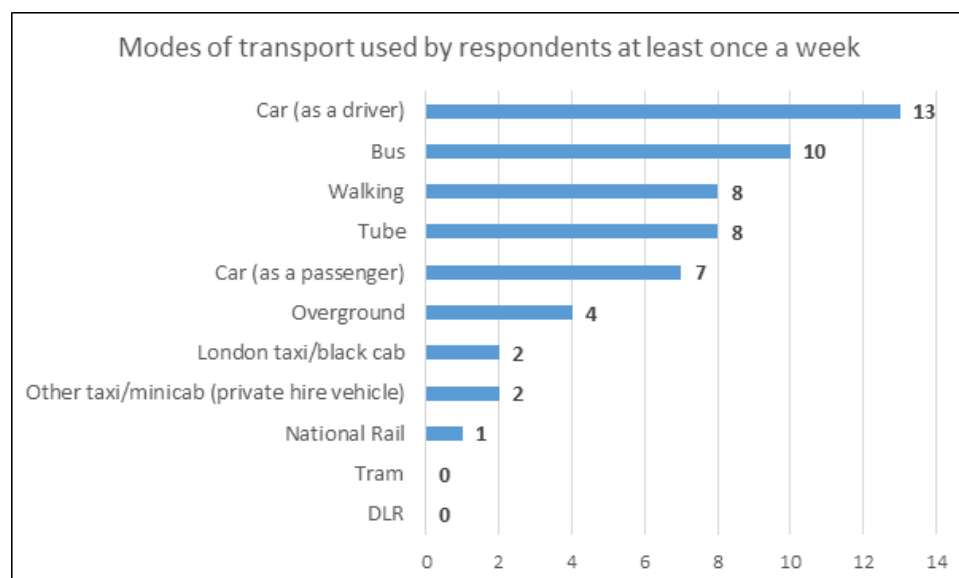
Respondents were able to select more than one option.

### What is the main mode of transport used by respondents?





## Which modes of transport are used by respondents at least once a week?



## Appendix 2 – code framework for open text responses

Code ID	Question	Theme	Number	Percentage of mentions of theme within question
PO3	2	Difficult to understand how application will be assessed	5	29%
PO4	2	Response does not relate to question – other issue raised	5	29%
PO1	2	Policy is confusing/hard to understand (general)	4	24%
PO2	2	Difficult to understand access/enforcement (as permit holder)	2	12%
PO5	2	Response unclear	1	6%

<b>Code ID</b>	<b>Question</b>	<b>Theme</b>	<b>Number</b>	<b>Percentage of mentions of theme within question</b>
EL5	3	Response does not relate to question – other issue raised	4	44%
EL4	3	Carers/family should be eligible for exemption	3	33%
EL1	3	Concerns over assessment of eligibility criteria	3	33%
EL3	3	Eligibility criteria is too broad	2	22%
EL2	3	Eligibility criteria is too narrow	2	22%
EL6	3	Response unclear	2	22%
CO1	4	Bowel conditions including Crohn's, IBS	3	16%
CO2	4	Arthritis/joint pain	3	16%
CO9	4	Response does not relate to the question – other issue raised	3	16%
CO3	4	Wheelchair users and mobility issues	2	11%
CO4	4	Chronic pain	2	11%
CO5	4	Fibromyalgia	2	11%
CO6	4	Mental health issues	1	5%
CO10	4	Response unclear	1	5%
CO7	4	Learning difficulties	1	5%

<b>Code ID</b>	<b>Question</b>	<b>Theme</b>	<b>Number</b>	<b>Percentage of mentions of theme within question</b>
CO8	4	Amputees	1	5%
SC4	5	Response does not relate to question – other issue raised	4	36%
SC1	5	I don't understand the scope of the IEP	3	27%
SC2	5	I don't support the scope of the restrictions (too stringent)	2	18%
SC3	5	I support the scope of the restrictions	2	18%
VE1	6	Concerns about enforcement	3	27%
VE4	6	Support the policy's position on vehicle exemptions	2	18%
VE2	6	Taxis/PHV/Car club vehicles should be included	2	18%
VE5	6	Response does not relate to question – other issue raised	2	18%
VE3	6	Permit holders should be allowed to exempt multiple vehicles	1	9%
VE6	6	Response unclear	1	9%
AP2	8	Application difficult to use /inconvenient	3	37%

<b>Code ID</b>	<b>Question</b>	<b>Theme</b>	<b>Number</b>	<b>Percentage of mentions of theme within question</b>
AP3	8	Response does not relate to the question – other issue raised	3	37%
AP1	8	I did not apply for the exemption	2	25%
EV1	9	Evidence requirements are too onerous for applicant	3	33%
EV3	9	Response does not relate to the question – other issue raised	2	22%
EV4	9	Evidence from a GP should be sufficient	2	22%
EV5	9	Concerns over who is assessing evidence	1	11%
EV2	9	P.I.P Entitlements are sufficient for exemption	1	11%
IM2	11	Mostly positive impact	3	33%
IM1	11	Not helpful/ negative impact	2	22%
IM3	11	Concern exemptions will increase traffic in LTNs	2	22%
IM4	11	Response unclear	2	22%
GE5	12	Response does not relate to the question, other issue raised	5	36%
GE1	12	IEP is not helpful for all disabled people (incl. Blue Badge holders)	3	21%

<b>Code ID</b>	<b>Question</b>	<b>Theme</b>	<b>Number</b>	<b>Percentage of mentions of theme within question</b>
GE2	12	Positive/ support for IEP as implemented	2	14%
GE3	12	Concerns exemptions will increase traffic in LTNs	2	14%
GE4	12	Concerns with application process	2	14%