

# Equalities Impact Assessment:

## Full Assessment

### Summary of proposal

<b>Name of proposal</b>	Adopting the People-friendly streets low traffic neighbourhood Individual Exemption policy
<b>Reference number (if applicable)</b>	N/A
<b>Service Area</b>	Climate Change and Transport
<b>Date assessment completed</b>	11th June 2024

Before completing the EQIA please read the guidance and FAQs. For further help and advice please contact [equalities@islington.gov.uk](mailto:equalities@islington.gov.uk).

## 1. Please provide a summary of 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 with regards to adopting the low-traffic neighbourhood (LTN) “Individual Exemption” policy. The Individual Exemption policy provides for the issue of exemptions enabling permit holders to drive through camera enforced traffic filters in Islington’s existing low traffic neighbourhoods (LTNs) and future liveable neighbourhoods (LNs) in accordance with set eligibility criteria and evidence assessed on a case-by-case basis. The policy was introduced on a trial basis from 5 January 2023 under the people-friendly streets (PFS) programme.

Following the trial, which was launched on 5 January 2023, it is proposed that the Individual Exemption policy is adopted, with two amendments following consideration of feedback received during the trial and operational experience of implementing the policy. The Individual Exemption permit grants holders’ access through all camera-enforced filters with ‘No Motor Vehicle’ signage in all current LTNs and upcoming liveable neighbourhoods (LNs) in Islington. The exemption does not apply to School Street restrictions.

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 December 2023, the seven LTNs implemented in phase one of the PFS programme have been made permanent, following periodic and final monitoring and public consultations. Monitoring results have generally shown the schemes achieving the overall objectives of healthier, safer, cleaner and greener streets. Consultations during the trial periods of the respective LTNs have also shown evidence of behavioural change in line with the objectives of the scheme – one in five residents across six LTNs implemented between 2020 and 2021 indicated they were 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 access for emergency services, refuse collection and some council vehicles such as Accessible Community Transport (ACT). No other vehicles were offered exemptions. The council’s rationale to not provide exemptions is based on three reasons:

- Access to all addresses is maintained within LTNs, but routes may need to change.
- To create a safer environment for people to walk, wheel and cycle by significantly reducing motorised traffic on local streets.
- To reduce congestion and air pollution on the main roads. The objective of people-friendly streets is to reduce the overall number of trips, by supporting a change of transport away from private cars.

Following feedback from organisations including Disability Action in Islington (DAII), the Carer's Forum, Islington Parents' Forum, Travel London 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 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. In May 2022, this policy was updated so that an eligible individual may nominate someone else's vehicle.

In January 2023, the council introduced the Individual Exemption policy to complement the existing Blue Badge LTN policy. This permit provides people who may or may not live in a LTN or a future LN the opportunity to apply for an exemption to LTNs/LNs borough wide. Adopting the Individual exemption takes into account the council's continuing and 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/LNs 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.

Applications for an Individual Exemption are considered on a case-by-case basis and must be supported by relevant evidence demonstrating that the individual meets the eligibility criteria for exemption.

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 EqlA relates to adopting the Individual Exemption policy under the PFS programme and should therefore be read in conjunction with the 2021 programme-wide Resident Impact Assessments (RIA), and the scheme specific RIAs/EqlAs related to decisions taken on their implementation, continuation, including with the implementation of Blue Badge exemptions, and making permanent. (Note that in September 2021 all EqlAs in Islington were referred to as RIAs). An [EqlA](#) pertaining to the introduction of the Individual Exemption trial was published on 3 January 2023 as an appendix to the Individual Exemption trial [delegated decision report](#).

## 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 LTNs overall, as these impacts have been considered in the PFS programme-wide RIA dated [September 2021](#) and EqlA dated [January 2023](#). Each scheme has also been subject of individual EqlAs published as scheme decisions

were made at various points in the trial process under which they were implemented from June 2020 to December 2023.

The Individual Exemption policy may give 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 applies to all camera enforced filters with “No Motor Vehicle” restriction signage installed after 2020 in current LTNs and future LNs. Like the Home LTN, the exemption is offered to one vehicle per eligible applicant which may be their own or belong to someone else, but it should be the main vehicle used for the exemption holder’s travel. 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 for mode shift for all. The exemption permit is only valid when the exemption holder is in the vehicle (as a driver or a passenger).

The Individual Exemption was introduced with a three-year renewal period, after which they will be subject to a review whereupon the applicant may be asked to provide additional evidence.

Based on experience of a limited number of applications and enquiries, the Executive Committee report that this EqIA accompanies recommends introduction of discretion to issue one year permits in exceptional cases where it is considered that an applicant may meet the eligibility criteria but not for longer than one year. Possible examples of cases which may lead to issue of a one-year Individual Exemption may include: treatments for a condition which may improve in one year or less, diagnosis of a new but treatable condition where treatment may relieve some impacts of the condition, post-operative conditions where long term prognosis is unknown, and distress while establishing an effective dosage or treatment prescription for psychological conditions.

During the trial, the accompanying guidance (FAQ) 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. The Executive Report proposes that the main wording of the policy be amended to refer to this.

In adopting the Individual Exemption policy, the council aims to deliver a reasonable adjustment for individuals who rely on vehicle travel and as a result of disabilities or chronic conditions are substantially disadvantaged by increased time spent in a vehicle or re-routing of trips as a result of LTNs/LNs. The policy enables permit holders to undertake journeys that would not otherwise be possible or would only be possible with considerable difficulty or overwhelming distress.

Lower traffic volumes in LTNs/LNs 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 motor vehicles to travel through the borough. It is expected that

those who are eligible for the Individual Exemptions will be mostly making journeys that are not taken by public or more active transport modes. Between January 2023 and March 2024, 79 Individual Exemption permits have been issued. This relatively low number suggests that making the policy permanent will not lead to a significant or unacceptable increase in traffic in and through LTNs/LNs whereby compromising their integrity. For context, over 1000 vehicles are exempt under the Blue Badge/Home LTN policy.

However, any increase in traffic on filtered streets poses a small risk of increased road danger with children, older people and people with disabilities being particularly at risk of collision in these areas when traffic volumes increase. With regard to this risk and considering the council's objectives of achieving 'Vision Zero' by 2030, the accompanying guidance instructs exempt individuals to approach filters slowly and with caution, having regard for people who are crossing the road or cycling. Any problematic increases in traffic volumes considered to be related to the adoption of the Individual Exemption policy that arise will be reviewed and efforts will be made to mitigate these effects.

As set out in Section 3B, people with disabilities who might otherwise meet the criteria for an Individual Exemption but rely solely on taxis and/or private hire vehicles (PHVs) for transportation, will not benefit from the adoption of the Individual Exemption policy. Table 2 below shows the percentage of trips made by disabled people making trips by taxi (for disabled people in Islington, 'London black cab' and 'other/minicab' makes up 3.2% of trips.

It is recognised that individuals who would meet the criteria but rely on taxis or other private hire vehicles for transport do not directly benefit from the Individual Exemption, as it is not technologically feasible for the council to exempt public taxis only when carrying certain passengers. The council intends to work with other boroughs, Transport for London (TfL) and taxi/PHV providers to explore the possibility of a technological and regulatory solution, which would allow specific and time limited exemptions for taxis/PHVs which are carrying Blue Badge holders who are eligible for the Home LTN exemption, or Individual Exemption permit holders. The council has participated in preliminary meetings with other North London boroughs and will provide an update when further information is available. However, at present the council does not have the logistical resource and capability to implement such exemptions.

### 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**

## **General**

The Individual Exemption policy will have borough-wide impacts as it applies to all camera-enforced traffic filters in Islington's LTNs, and forthcoming liveable neighbourhoods. The impacts of the policy may also extend beyond Islington as applicants may apply from outside the borough, if they can provide evidence of frequent journeys in Islington. Table 1 provides a demographic breakdown of Islington, compared to London as a whole.

**Table 1 - Demographics of London and Islington**

	<b>London Total: 8,799,723</b>	<b>Islington Total: 216,612</b>
Gender: Female	51%	52%
Gender: Male	49%	48%
Age: Under 16	19%	15%
Age: 16-24	11%	13%
Age: 25-44	34%	41%
Age: 45-64	24%	21%
Age: 65+	12%	9%
Disabled	13%	16%
Ethnic group: BAME	46%	38%
Ethnic group: White	54%	62%
Religion or belief: Christian	41%	35%
Religion or belief: Muslim	15%	12%
Religion or belief: Other	10%	5%
Religion or belief: No religion	27%	41%
Religion not stated	7%	8%

Source: 2021 Census data available at:

<https://www.ons.gov.uk/census/aboutcensus/censusproducts/topicsummarries>

## **Disability**

A marginally greater proportion of people in Islington (16%) identify as disabled compared to London as a whole (13%).

The higher percentage of Islington residents who have a disability is particularly significant for this EqIA and is referred to in the assessment of equalities impacts.

Disabled people are five times more likely to be injured as a pedestrian than non-disabled people. (<https://roadsafetygb.org.uk/news/disabled-and-low-income-pedestrians-at-higher-risk-of-road-injury/>). Given such a significant percentage of disabled residents walk or wheel

(proportionally more than those who drive, use taxis or ride as a passenger), the benefits for disabled people of reducing the dominance of cars on Islington's streets can be reasonably inferred.

The Individual Exemption policy has been carefully considered to achieve a fair and reasonable policy, ensuring exemptions are provided 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 disabled Londoners who do not travel by car as a driver or passenger (see Table 2).

The positive impacts of LTNs on local traffic levels, as is largely evidenced by individual LTN pre-consultation and final decision monitoring reports, means less congestion for exempt vehicles once the Individual Exemption is made permanent.

### **Travel modes**

Whilst private cars, taxis and PHVs 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%). [Source: Transport for London (TfL) - Travel in London: Understanding our diverse communities, 2019].

Table 2 shows the percentages of different trips by mode by different users, showing that disabled people in Islington are more likely to be car passengers (16.7% of trips) than non-disabled people (6.2% of trips).

**Table 2 - Percentages of different trips by mode by different users**

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%
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%

<sup>1</sup>Source: Analysis of the London Travel Demand Survey (LTDS) during the period 2016-19 (London Travel Demand Survey: <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/consultations-and-surveys#on-this-page-1>)

**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

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?
Age	Positive and Negative	<p><b>Positive:</b></p> <p><u>Young people</u></p> <p>The Individual Exemption policy benefits children/young people who have conditions that mean travelling in a vehicle for increased periods or re-routing of trips causes overwhelming psychological distress, or considerable physical discomfort and qualify for the exemption will be able to travel more directly to school, appointments or care, if their parent/caregiver has access to a vehicle.</p>	



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><u>Older people</u></p> <p>Older people, who may have higher instances of disabling conditions leading to eligibility for an exemption benefit from the ability to travel more directly in or through LTNs/LNs.</p> <p><u>All age groups</u></p> <p><b>Negative:</b></p> <p>Children and older people who do not drive or have access to a vehicle within their household could be impacted by the effects of adopting the Individual Exemption policy if local traffic rises due to a future increase in vehicle exemptions. This could make streets more unsafe and create an intimidating environment for people who do not rely on cars for their mobility, ultimately hindering the objectives of the LTN/LNs.</p>	<p><b>Negative:</b></p> <p>The risk of this impact is demonstrably low, given the small cohort of people who have been eligible for an Individual Exemption to date. As of March 2024, 79 Individual Exemptions have been issued. Additionally, the final monitoring of LTN schemes in 2023 does not suggest there has been any discernible impact specifically from exemptions granted to permit holders and the policy has not materially impacted the PFS objectives.</p>

Disability	Positive and Negative	<p><b>Positive:</b></p> <p>The proportion of disabled residents in Islington (16%) is slightly higher than the London average (13%). The Individual Exemption policy ensures that the benefits of low traffic neighbourhoods and liveable neighbourhoods including easier/more pleasant journeys, increased independence, decreased risk from road danger and reduced levels of noise and air pollution are preserved while delivering reasonable adjustments for individuals who are disabled and/or have chronic conditions.</p> <p>While the Home LTN exemption requires an Islington council-issued Blue Badge, 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 condition who are not Blue Badge holders. By removing this eligibility requirement, the Individual Exemption recognises a broader range of disabilities and/or impairments.</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.</p>	<p><b>Positive:</b></p> <p>Limiting the number of exemption permits issued ensures that that the benefits of LTNs/LNs are preserved for all individuals, including those with disabilities who may not be eligible for exemption, while providing an exemption for those with genuine need for shorter and/or direct journeys.</p>
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**Negative:**

The Individual Exemption policy benefits some individuals, but the eligibility 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. Some disabled individuals who experience negative impacts caused by LTNs, in common with the wider public, including increased inconvenience of car travel, or increased cost of taxi/ PHV travel will not benefit from an exemption.

Disabled individuals who could meet the exemption criteria but do not have access to a vehicle to nominate, or someone else to drive them, will not benefit from the Individual Exemption policy. These disabled people may rely on taxis or other PHV for transport. At the time of the decision to adopt the policy, it is not possible to implement an exemption for Individual Exemption permit holders using taxis or PHVs, as enforcement cameras would not detect whether a permit holder is travelling in a vehicle. To apply the exemption to these permit holders, the implementable solution in theory would be to exempt all taxis and PHVs that could use Islington's roads, which would have significant impacts in terms of traffic volumes and dilute the benefits of the LTNs. There are 114,900 licenced taxis and PHVs operating in London, as of 2020 (<https://assets.publishing.service.gov.uk/government/>) which clearly do not solely, or mostly, transport disabled

**Negative:**

The London Taxicard Scheme offers subsidised travel in licenced taxis and PHVs to London residents with serious mobility impairments or who are severely sight impaired, which would not qualify one for an Individual Exemption permit. This could offset some of the increase in costs resulting from slightly longer routes as a result of the LTN schemes. The council will work to promote uptake of this scheme amongst potentially affected groups.

The council will work with other boroughs, TfL and taxi/PHV providers to explore the possibility of a technological and regulatory solution, which would allow specific and time-limited exemptions for taxis/PHVs which are carrying exemption holders. As noted above, the council does not currently have the resources to implement time-limited exemptions.

people. This alternative is not considered acceptable. Nor does the council have the logistical resource and capability implement this alternative.

If a technological solution can be found which allows specific and timed exemptions for only those taxi/PHV trips taken by exemption permit holders who are resident in Islington, compatible with our current use of Automatic Number Plate Recognition (ANPR), then the council will consider exemptions for taxis/PHVs for the purpose of carrying an exemption permit holder. This would be of benefit only to the 3.2% of trips taken by disabled people which are in taxis or PHVs (this data is shown in Section 3).

Disabled people who do not travel by private vehicle, taxi or PHV could be impacted by the individual exemption policy if local traffic rises as a result of the adoption of the policy. 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 (Source: [Disabled and low-income pedestrians at 'higher risk of road injury' \(roadsafetygb.org.uk\)](https://roadsafetygb.org.uk))

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.

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. The monitoring of LTN schemes in 2023 ahead of final decisions does not suggest any substantial increases in traffic due to exemption permit holders.

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>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>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 carers who are visiting several</p>	<p>The evidence requirements of the Individual Exemption policy were informed by an independent report produced by Systra Ltd. 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 has assessed feedback on the evidence requirements from residents/road users as part of the trial implementation of the policy. It is acknowledged that the evidence requirements around proving eligibility are not fully supported, however the evidence is needed to assess the individual circumstances which is an implicit part of the case-by-case exemption.</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>

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?
		patients via chained trips throughout an LTN or multiple LTNs within the borough.	

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)	Positive and Negative	<p><b>Positive:</b></p> <p>For those eligible for the individual exemption requiring access to these places of worship in Islington, they will benefit from a faster and more direct route.</p>	N/a
Gender and gender reassignment (male, female, or non-binary)	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?
Maternity or pregnancy	Positive and Negative	<p><b>Positive:</b></p> <p>Parents who are the primary caregivers for children with severe disabilities/conditions or children who have psychological conditions which impact the child's ability to spend time in a vehicle for prolonged periods will benefit from being able to take more direct routes through the borough as a result of the adoption of the Individual Exemption policy.</p> <p><b>Negative:</b></p> <p>N/a</p>	<p><b>Positive:</b></p> <p>N/a</p> <p><b>Negative:</b></p> <p>N/a</p>



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?
Sexual orientation	Neutral	No specific impacts identified	n/a
Marriage or civil partnership	Neutral	No specific impacts identified	n/a
Other) (e.g., people living in poverty, looked after children, people who are homeless or refugees)	Positive and Negative	<p><b>Negative:</b></p> <p><b>Digital Exclusion</b> – 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 adoption of the Individual Exemption policy and applying for exemption.</p> <p>Information surrounding the policy including the adoption of the policy with amendments will be available online at the council’s webpages.</p>	<p><b>Negative:</b></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:

- 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><u>More inconvenient car trips</u></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 or disability, who do not qualify for the Individual Exemption (or the Home LTN exemption).</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. This 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 with other boroughs, TfL and taxi/PHV providers to explore the possibility of a technological and regulatory solution, which would allow specific and time-limited exemptions for taxis/PHVs which are carrying Blue Badge holders who are Islington residents.</p>	<p>Increased use of scheme amongst target participants</p>	<p>Transport Projects and people-friendly streets team to oversee.</p> <p>London Councils provide funding.</p>

<p><u>More inconvenient car trips</u></p> <p>The Individual Exemption policy does not include taxis and private hire vehicles or medical professionals. It does, however, allow the holder to nominate a vehicle belonging to someone else receive the exemption. This allows a carer or family member to help drive the permit holder.</p>	<p>As a next step in LTN/LN exemptions, the council will work with other boroughs, TfL and taxi/PHV providers to explore the possibility of a technological and regulatory solution, which would allow specific and time-limited exemptions to accommodate taxi journeys for 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. This will progress as technological and resourcing capabilities allow.</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 an extension of the exemption policy to include more trips by disabled people 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 to oversee.</p> <p>Transport for London (TfL) and London Councils (LCs) to help explore options.</p> <p>TfL and LCs provide funding.</p>
<p><u>Increases in traffic on local/filtered roads</u></p> <p>Traffic on local streets may rise as a result of the number of Individual Exemption permits issued.</p> <p>A high number of exemptions may dilute the benefits of LTNs or LNs including improved air/noise</p>	<p>Monitoring the number of exemption permits issued will continue once the policy is adopted</p>	<p>Currently, there are 79 active Individual Exemption permits issued between January and March 2024</p>	

**Please provide:**

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

pollution and an increased uptake in active travel.

Any number of exempt vehicles may take people walking/wheeling or cycling by surprise which could result in collisions. This would particularly impact people from protected groups such as age, disability and maternity.

Clarifying the requirement that non-Islington residents demonstrate proof of frequent travel through the borough to be eligible for exemption will help ensure that the exemption is being used by those with a genuine need and those who are placed at substantial disadvantage due to LTNs.

Once adopted, language will remain in the policy guidance and the permit issue letter stating that exemption holders must approach traffic filters with caution when in their vehicles to minimise risk to all street users, and particularly those with protected characteristics.

Blue Badge team to provide regular updates to People-friendly streets team on the number of exemption permits issued.

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

**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**

The Individual Exemption policy was informed by research jointly commissioned by four north London boroughs and produced by SYSTRA Ltd. (Systra). Systra's research paper 'North London Boroughs LTN Exemption Policy Review' (July 2022) provided recommendations for consideration on possible exemption policies and processes for implementing them. These recommendations were based on evidence collected by Systra including stakeholder interviews with individuals with various mobility needs and impairments.

Development of the policy also considered 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.

Throughout the PFS programme, specific engagement has been undertaken with groups representing disabled people and with disabled individuals, especially around the development of the Blue Badge exemption policy and commitment to introducing the 'Exceptional Circumstance Dispensation'. The introduction of the Blue Badge exemption policy was agreed in the council's Executive Report of 14 October 2021. The report and its accompanying RIA , contain more details on the engagement carried out to develop the policy. In May 2022, the Blue Badge exemption policy was updated to allow a Blue Badge holder who does not have access to a vehicle registered to their address to nominate someone else's vehicle to be registered for the permit, such as a carer, friend, or family member. The Individual Exemption permit also allows the permit holder to nominate a vehicle registered to someone else, acknowledging that some individuals may not have access to their own vehicle, or may not be able to drive.

In response to recent and historic engagement with disabled groups with regards to the need for exemptions for disabled taxi/PHV users and disabled people who may not qualify for either the Blue Badge or Individual Exemption permit, the council acknowledges that the implementation of the policy will not benefit those users and is limited. The justification and rationale for the exclusion of taxis is explained in more detail in Section 3B of this EqIA as well as suggested action for working towards granting exemptions in the future.

The council will continue to engage directly with groups representing disabled people and disabled individuals as part of the wider PFS programme. In May 2022 the council established the Islington Transport Accessibility Advisory Group (ITAAG) which gathers officers and representatives of disability and mobility groups to discuss transport-related topics. The group provides the opportunity for community groups to advise on emerging policy related to transport and people-friendly streets at an early stage including advising on engagement approaches.

Public feedback was gathered from residents and road users during the policy's trial implementation period from January to June 2023. The purpose of the concurrent feedback period rather than a formal public consultation in advance of implementing the policy meant that the individual exemptions could be provided sooner and its benefits would not be delayed for eligible individuals.

Feedback on the policy and the application process was collected through two versions of an online trial feedback survey (with paper copies available upon request).

30 responses to the long form survey and one response to the short form survey were submitted (31 responses total).

A full analysis of findings from the survey feedback is appended to the Executive report that this EqlA accompanies which proposes adopting the Individual Exemption, with some amendments to the policy to clarify guidance on applicants who are non-Islington residents, and discretion to issue exemptions for one year in circumstances where it is considered that the applicant meets the eligibility criteria, but may not be eligible for more than one year.

## 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 exemption permits issued will be monitored.	Transport projects and people-friendly streets team. Blue Badge team.	Monthly reports
Traffic in future liveable neighbourhoods will be monitored in accordance with monitoring strategies and practice at the time.	Transport projects and people-friendly streets team.	Ongoing

Please send the completed EQIA to [equalities@islington.gov.uk](mailto: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	Hannah Leslie	<i>Hannah Leslie</i>	12/02/2024
Fairness and Equality Team	Hezi Yaacov-Hai	<i>Hezi Yaacov-Hai</i>	11/06/2024
Director or Head of Service	Matt Bonomi	<i>MatBonomi</i>	1/03/2024

