

Freedom of Information Act 2000 (FOIA)
Environmental Information Regulations 2004 (EIR)
Decision notice

Date: **30 January 2024**

Public Authority: **London Borough of Islington**
Address: **Islington Town Hall**
Upper Street
London
N1 2UD

Decision (including any steps ordered)

1. The complainant submitted a 46 question request to the London Borough of Islington ('the Council') about the Low Traffic Neighbourhood Scheme. The Council provided some information but refused to provide the remainder on the grounds that it either did not hold the requested information (regulation 12(4)(a) of the EIR) or that it engaged regulation 12(4)(b) (manifestly unreasonable) of the EIR.
2. During the course of the Commissioner's investigation the Council amended its position and sought to rely entirely on regulation 12(4)(b) (manifestly unreasonable) of the EIR. The complainant challenged its reliance on that exception.
3. The Commissioner's decision is that the Council was entitled to rely on regulation 12(4)(b) of the EIR to refuse the request. However, it breached regulation 9(1) of the EIR by not providing appropriate advice and assistance to the complainant to submit a refined request.
4. The Commissioner has also concluded that the Council breached regulations 5(2) and 14(2) of the EIR by failing to respond to the request within 20 working days. The Commissioner has also found the

Council in breach of regulation 11(4) as it failed in its duty to provide an internal review within 40 working days.

5. The Commissioner requires the Council to take the following steps to ensure compliance with the legislation.
 - Provide the complainant with appropriate advice and assistance on how she might narrow down/refine the request so that it would not engage regulation 12(4)(b), or explain why this would not be possible.
6. The Council must take these steps within 35 calendar days of the date of this decision notice. Failure to comply may result in the Commissioner making written certification of this fact to the High Court pursuant to section 54 of the Act and may be dealt with as a contempt of court.

Request and response

7. On 20 February 2023, the complainant submitted a 46 multi-part request to the Council for information about the Low Traffic Neighbourhood Scheme ('LTN'). Of the 46 questions, some are broken down into several further parts making a total of 69 individual parts that require an answer. Given the length of the request, it is reproduced in the appendix to this notice.
8. The Council replied on 24 May 2023. It provided some information for 10 questions but refused to provide the remainder on the grounds that it either did not hold the requested information or that regulation 12(4)(b) (manifestly unreasonable) of the EIR was engaged. A number of links were provided to the complainant to parts of its website, where it had published information about LTNs¹.
9. On 27 June 2023, the complainant contacted the Council to query when the deadline was for requesting an internal review. The Council advised she had 2 months from the date its response was sent, so the deadline was 24 July 2023.
10. On 9 August 2023, the complainant requested an extension to submit an internal review. On 11 August 2023 the Council advised the complainant that since more than 2 months had elapsed, it could not conduct an internal review.

¹ <https://www.islington.gov.uk/roads/people-friendly-streets/low-traffic-neighbourhoods>

11. On 23 August 2023, the complainant contacted the Commissioner to complain about the Council's failure to respond adequately to the request. On 5 September 2023, the Commissioner accepted this complaint without an internal review in order that the complainant was not subject to further delays.
12. On 2 November 2023, the Commissioner wrote in the usual way to the Council asking it to revisit the request and requesting its submissions.
13. On 30 November 2023 the Council provided an internal review to the complainant and submissions to the Commissioner. In the internal review response, the Council amended its position and sought to rely entirely on regulation 12(4)(b) (manifestly unreasonable) of the EIR to refuse to comply with the request. It said compliance with the request was "too burdensome for the service to be able to respond in full". The Council estimated that it would take over 40 hours to respond to the request. The Council set out in a table for both the complainant and Commissioner a detailed assessment of the time it would take to determine whether the Council held the information requested by the complainant. The Council also set out the public interest factors in favour of maintaining the exception.
14. By way of advice and assistance, the Council told the complainant that in its original response, the Council had explained where information is not held and confirmed where information is already in the public domain and 4 links were again provided to parts of the Council's website.

Scope of the case

15. The complainant contacted the Commissioner on 13 December 2023 to complain about the outcome of the internal review.
16. The complainant challenged the Council's reliance on regulation 12(4)(b) to refuse to respond further to her request.
17. Following the Council's revision of its position in the internal review, this decision notice therefore considers the Council's reliance on regulation 12(4)(b) and whether it has complied with its obligation to provide advice and assistance in line with regulation 9 of the EIR.

Reasons for decision

Regulation 12(4)(b) – Manifestly unreasonable request

18. Under regulation 12(4)(b) a public authority may refuse to disclose environmental information if the request for information is manifestly unreasonable. A request may be manifestly unreasonable because of the excessive burden caused by complying with it.
19. The Council has explained that complying with this request would impose on it an unjustifiable burden. The Commissioner will therefore consider whether complying with this request is likely to cause a burden to the Council that is disproportionate to the request's value.
20. The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 (the 'Regulations') set out an upper limit for responding to requests for information under FOIA. The limit for local authorities is £450, calculated at £25 per hour. This creates an effective time limit of 18 hours work. Where the authority estimates that responding to a request will exceed this limit, it is not under a duty to respond to the request.
21. Although there is no equivalent limit within the EIR, the Commissioner considers that public authorities may use equivalent figures as an indication of what Parliament considers to be an unreasonable burden, when responding to EIR requests. However, the public authority must balance the estimated costs against the public value of the information which would be disclosed, before concluding whether the exception is applicable.
22. Under the Regulations, in estimating the time and burden involved in responding to a request, a public authority may take account of the time it would take to:
 - determine whether it holds the information;
 - locate the information, or a document which may contain the information;
 - retrieve the information, or a document which may contain the information; and
 - extract the information from a document containing it.
23. Furthermore, unlike FOIA, under the EIR public authorities are entitled to include the time taken to consider the application of exceptions when calculating the cost of compliance with an EIR request.

The work involved in complying with the request

24. In a detailed submission to the Commissioner, the Council explained that the request was substantial in terms of the information that would need to be consulted to check for relevant information. It said the work involved identifying, locating, extracting, redacting and providing the information underpinning 46 questions, with some broken down into several further parts, making a total of 69 individual parts that require an answer.
25. The Council provided the Commissioner with an overview of each strand of work and summarised what would be involved in determining whether it held information, locating the information, retrieving the information, extracting the information and redacting it. It provided a breakdown of the actual tasks likely to be involved in complying with each aspect of the request and also provided a timed estimate for each task. Very similar information was provided to the complainant in the internal review. Due to their detail, the Commissioner has not reproduced the submissions here.
26. The Council estimated that the work involved in complying with the request would exceed 50 hours, at a total cost of £1,250. The Commissioner notes that 50 hours was arrived at by the Council after conducting some timed sampling exercises, compared to the estimated figure of 40 hours, set out in the internal review response.
27. The Commissioner has also carefully considered the arguments provided to him by the complainant on 13 December 2023 as to why she does not accept the validity of the Council's timed estimates. In relation to several questions, the complainant considers that the time estimates are unsubstantiated or inflated.
28. After considering all the arguments presented by both sides, in conclusion, having reviewed and considered the Council's timed estimate and responses, the Commissioner accepts that the situation is more complex, and the work required by the Council more involved, than it would initially appear. Given the breadth of the information involved, the manual checking of information that is required, and the fact that multiple teams potentially hold information, he is satisfied in the circumstances, that the request will be very difficult to answer.
29. The Commissioner is satisfied that the Council has clearly demonstrated that compliance with this 46 question request would involve the manual review of a significant number of records, across various business areas and locations, and that multiple staff would need to be consulted.
30. The Commissioner is therefore satisfied that the Council's estimate of the work involved in complying with the request is cogent and credible. On the basis of the Council's timed estimate, compliance would vastly

exceed the 18 hour appropriate time limit as legislated for under FOIA, by a considerable margin. The Commissioner also notes that, even if the Council's estimate was halved to 25 hours, it would still be well in excess of the 18 hour appropriate time limit.

31. The Commissioner's view is that the Council could not be expected to absorb that amount of work without it having an impact on its other areas of work. Complying with the request would impose a significant impact on Council staff. Complying with the request would divert staff away from their core functions within the organisation for significant amounts of time.

The value of the request

32. The Commissioner has considered the importance of the underlying issue to which the request relates, and the extent to which responding to the request would shed light on that issue. Given the impact of the LTNs on individuals in the borough, the complainant's requests undoubtedly have a value.
33. He notes that since the Council launched the LTN there has been considerable public interest, both positive and negative. The Commissioner recognises the impact that local traffic measures can have on the day-to-day lives of residents within communities and he recognises that the introduction of such schemes has proved to be controversial.
34. The Council told the Commissioner that the Council's LTN has generated a substantial number of queries from residents which include both formal requests under the EIR, members enquiries and 'business as usual' requests. To ensure that information is readily available to the public the Council says it has endeavoured to be proactive in its publication and provides information in response to queries where it is not yet readily available publicly. The Council states it has attempted to satisfy these queries, via publication of information on its website, as well as responding to 120 formal EIR requests within the last 18 months - where it was easily able to do so.
35. The Council say that in some cases, there has been considerable opposition from residents and "residents have taken to submitting 'weaponised' EIR requests in a coordinated approach." It is noted that the complainant takes issue with this characterisation of her request and states it is unjustified. The Commissioner has not been provided with any evidence that this applies in this case and the Commissioner therefore makes no further comment on it in this notice. However, the Commissioner notes that the Council argues that due to the amount of requests received, "This has meant that the Council has had no alternative but to consider the collective impact of requests."

36. The Commissioner has viewed the relevant parts of the Council website² and notes that LTNs are clearly a matter about which the Council holds a considerable amount of information and about which it has engaged in extensive consultation. The complainant had been provided with several links to a large amount of published information about the LTNs. The Council has therefore published a large amount of information on LTNs, and a wide range of documentation including reports, consultation materials, meetings with residents, studies, monitoring reports and guidance. Some of the complainant's questions would likely be answered by this published material.
37. From the information provided to the Commissioner, he can see that a disproportionate burden has been placed on the Council by the sheer number of EIR requests and the time it has taken to respond to them. The Commissioner is therefore mindful that the request in this case must be viewed in context with the other FOIA/EIR requests. The Commissioner accepts the Council's position that it has been placed under a disproportionate level of disruption and that the requests have impacted on its ability to function.
38. The Commissioner is also mindful that to respond to this extremely large volume of questions from one individual is not a justifiable use of staff resources in the current financial climate. Like many public sector organisations, the Council told the Commissioner that it "operates against extreme funding pressures, and it must protect its resources to ensure that it is able to run its core services efficiently and effectively for all residents."
39. Having considered the Council's explanation, it appears to the Commissioner that disclosing the requested information would not add meaningfully to the public's understanding of the Council's position on LTNs. There is already a significant volume of relevant information and research material in the public domain. Directing individuals at the Council to focus on addressing all 69 parts of the complainant's request would be a significant distraction given the complexity and technical nature of the questions.

Is the request 'manifestly unreasonable'?

40. The Commissioner is mindful that a balance needs to be struck between the burden placed on the Council and the benefits of processing such a large request for information. The 69 individual questions submitted by the complainant are excessive, disproportionate and an unjustified level

² <https://www.islington.gov.uk/roads/people-friendly-streets>

of burden on the Council. In his view, despite such an interest in this issue, such a burden is difficult to justify and therefore the Commissioner is satisfied that the request is manifestly unreasonable.

Public interest test

41. Regulation 12(4)(b) is subject to the public interest test. This means that where an exception is engaged, a public authority may still only refuse a request if the public interest in maintaining the exception outweighs the public interest in disclosing the information.
42. The Commissioner recognises that there will always be a public interest in disclosure to promote transparency and accountability of public authorities, greater public awareness and understanding of environmental matters, a free exchange of views, and more effective public participation in official decision-making.
43. The Commissioner has also taken into account (and accepts) the complainant's views that her request has a legitimate aim. On 13 December 2023, the complainant explained to the Commissioner that:

"I am aware there are multiple organisations addressing issues raised by: traffic changes, LTNs and a perceived lack of access to democratic participation re local authorities. I'm personally familiar with a couple of these groups. (It is hard to avoid since it is an area of significant local interest) ...

I should add that the groups to which the council presumably refer have clear objectives. Among these are: justice for (less affluent) 'boundary' road residents amid increased traffic and pollution as result of offset LTN area traffic, an opportunity for such residents to participate in consultations, Council support for disabled residents affected by these policies, transparency around traffic monitoring, transparency around health outcomes, responses to communications, preparedness to consider lived experiences of residents who have been negatively affected by these policies.

In other words, these groups don't exist to disrupt the council but have legitimate aims. Among these is defending democratic process and achieving fairness around matters in the public interest and concerning public health. This local interest also has a wider national application. This is happening while ordinary mechanisms and standards expected of local government appear to have failed. The Council's assertion that such FOI requests are automatically 'in bad faith' I feel in itself exemplifies a profound and concerning lack of engagement."

44. The Commissioner has considered the complainant's views and many of the issues relevant to the public interest test (ie the request's

proportionality and value) when deciding whether this exception was engaged. While there is significant strength of feeling about the Council's LTNs, he assessed that the benefit that would flow from the disclosure of the information that has actually been requested in this case, would be somewhat limited.

45. There is significant information all available on the Council's website for anyone to review and examine. The Council has told the Commissioner that it has already engaged in extensive consultation exercises for these schemes. There have been meetings both formal and informal with residents to discuss these schemes and to hear the concerns of residents. In its original response, it is noted that the Council proactively answered 10 of the complainant's questions and made four links available to the complainant of the most relevant information to her questions. The Council also indicated to her where information was not held by it in relation to certain of her specific questions. These factors go some way to addressing the public interest in disclosure. (The Commissioner also notes for completeness that the EIR concerns recorded information only. It does not require a public authority to answer general questions, provide opinions or explanations, generate answers to questions, or create or obtain information it does not hold).
46. The public interest in maintaining this exception lies in protecting public authorities from exposure to disproportionate burden. Dealing with a manifestly unreasonable request may strain a public authority's resources and get in the way of it delivering mainstream services or answering other requests.
47. In this case, the Council has shown that the work involved in responding to the request would be very expensive and time consuming. Public authorities have limited resources and there is a strong public interest in them being able to protect those resources in order to carry out their wider obligations fully and effectively.

The Commissioner's decision

48. Having considered the above matters, the Commissioner has placed considerable weight on the fact that directing individuals at the Council to focus on addressing all 69 parts of the complainant's request would be a significant distraction given the complexity and technical nature of the questions. In addition, the request may put a strain on Council resources. Further he notes that there is a significant amount of information already in the public domain.
49. In light of this, he is satisfied that there is insufficient public interest in disclosure to justify the burdensome impact of compliance on the Council's resources. His decision is therefore that the public interest favours maintaining the exception. The Council was therefore entitled to

rely on regulation 12(4)(b) of the EIR to refuse to comply with the request.

Regulation 12(2) - Presumption in favour of disclosure

50. Regulation 12(2) of the EIR requires a public authority to apply a presumption in favour of disclosure when relying on any of the regulation 12 exceptions. As stated in the Upper Tribunal decision *Vesco v Information Commissioner* (SGIA/44/2019)³:

“If application of the first two stages has not resulted in disclosure, a public authority should go on to consider the presumption in favour of disclosure...”

and

“... the presumption serves two purposes: (1) to provide the default position in the event that the interests are equally balanced and (2) to inform any decision that may be taken under the regulations” (paragraph 19).

51. As set out above, in this case the Commissioner’s view is that the balance of the public interest favours the maintenance of the exception, rather than being equally balanced. This means that the Commissioner’s decision, whilst informed by the presumption provided for in regulation 12(2), is that the exception provided by regulation 12(4)(b) was applied correctly.

Regulation 9 – Advice and assistance

52. Regulation 9(1) of the EIR says that a public authority shall provide advice and assistance, so far as it would be reasonable to expect it to do so, to applicants and prospective applicants. The First-tier Tribunal has also commented that public authorities have a duty to act in a reasonable way when refusing a request under regulation 12(4)(b) of the EIR⁴.
53. The Commissioner notes that in its original response the Council answered 10 of the complainant’s questions and indicated where information was not held or where the question asked was hypothetical.

³https://assets.publishing.service.gov.uk/media/5d7a6a2340f0b61d01bba991/SGIA_44_2019.pdf

⁴[https://informationrights.decisions.tribunals.gov.uk/DBFiles/Decision/i1711/Bright,%20Timothy%20EA.2015.0107%20\(16.11.15\).pdf](https://informationrights.decisions.tribunals.gov.uk/DBFiles/Decision/i1711/Bright,%20Timothy%20EA.2015.0107%20(16.11.15).pdf)

For four questions it advised the complainant to narrow her request to a specific LTN scheme.

54. The Commissioner notes also that the Council reiterated this in its internal review response and also referred the complainant again to four specific parts on its website where information was available as follows:
- Low Traffic Neighbourhoods⁵
 - Barnsbury and Laycock Liveable Neighbourhood⁶
 - Cycleway 38 Liverpool Road trial⁷
 - Holloway Road to Pentonville Road⁸
55. The Commissioner acknowledges that these answers and links was advice and information which it could be assumed would be of particular interest to the complainant even though the links were not a specific answer to what she had requested.
56. However, where a public authority is refusing a request under regulation 12(4)(b) as manifestly unreasonable because of burden or cost, the Commissioner normally expects it to provide the applicant with reasonable advice and assistance to help them submit a less burdensome request. For four questions the original response advised the complainant to narrow her request to a specific LTN scheme. No such advice was provided in the internal review.
57. In this case, therefore, the Commissioner's view is that the Council did not sufficiently address with the complainant whether, or how, the scope of the request might be narrowed or reduced. It did not provide appropriate advice and assistance on how she might narrow down/refine the request so that it would not engage regulation 12(4)(b), or alternatively, attempt to explain to the complainant why this would not be possible. The Commissioner considers that it would have been reasonable for it to have done so in the internal review for completeness and the complainant has indicated to the Commissioner that she is happy to reduce her list of questions if this increases her chances of

⁵ <https://www.islington.gov.uk/roads/people-friendly-streets/low-traffic-neighbourhoods>

⁶ <https://www.islington.gov.uk/roads/people-friendly-streets/liveable-neighbourhoods/barnsbury-laycock>

⁷ <https://www.islington.gov.uk/consultations/2021/cycleway-c38-south-trial>

⁸ <https://www.islington.gov.uk/roads/cycling/holloway-road-to-pentonville-road>

obtaining data. To rectify this, the Council must now take the action set out in paragraph 5, above.

Procedural matters

58. Regulation 5(2) of the EIR provides that information shall be made available as soon as possible and no later than 20 working days after the date of receipt of the request.
59. Regulation 14(2) of the EIR provides that a refusal shall be made as soon as possible and no later than 20 working days after the date of receipt of the request.
60. The Council provided its original response to the complainant's request more than 60 working days after the date of receipt. The Commissioner therefore finds that it breached both regulation 5(2) and 14(2). The Commissioner, however, notes that the Council has apologised to the complainant in its internal review for not providing her with a timely response to her original request. It also accepted that it was not proactive in keeping her updated.
61. Regulation 11(4) of the EIR provides that a public authority shall notify the applicant of its internal review decision as soon as possible and no later than 40 working days after the date of receipt of the representations.
62. The complainant was advised on 11 August 2023 that she was not able to submit an internal review request as she was out of time. However the Council now accepts that the complainant indicated a clear intention to complain about the original response in her email of 27 June 2023 which was well within the Council's two-month timeframe.
63. The Commissioner would commend the Council for their willingness to provide an internal review during his investigation. However, because it provided its internal review outcome more than 100 working days after the complainant first indicated she would submit an internal review, the Commissioner therefore finds that it breached regulation 11(4).

Other matters

Section 46 Code of Practice – Record keeping

64. The information seen by the Commissioner, particularly that related to questions 18-21 (namely a leaflet regarding Barnsbury & St Mary's average 12 hour day junction turning counts (7am-7pm)) when the

Council had initially told the complainant in its response to question 16 that it does not hold the requested information, suggests that the searches and checks carried out in the original response may not have been sufficiently thorough.

65. The Commissioner therefore draws the Council's attention to the importance of ensuring that its record management conforms with the section 46 Code of Practice⁹.

⁹ <https://ico.org.uk/media/for-organisations/documents/1624142/section-46-code-of-practice-records-management-foia-and-eir.pdf>

Right of appeal

66. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)
GRC & GRP Tribunals,
PO Box 9300,
LEICESTER,
LE1 8DJ

Tel: 0203 936 8963
Fax: 0870 739 5836
Email: grc@justice.gov.uk
Website: www.justice.gov.uk/tribunals/general-regulatory-chamber

67. If you wish to appeal against a decision notice, you can obtain information on how to appeal along with the relevant forms from the Information Tribunal website.
68. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

Signed

Jonathan Slee
Senior Case Officer
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Appendix

Questions about the Liverpool Road relate to the road/LTNs and not the 'Cycleway' unless specifically stated.

Where I have used the term LTN, this also refers to similar schemes such as 'Liveable Neighbourhoods'

1. Did Islington Council consult any residents living outside of LTNs on the schemes (such as, 'boundary road' residents)?
2. If yes, in which locations did this occur?
3. How many Liverpool Road residents did The Council directly consult regarding neighbouring LTNs? (not the Cycleway)
 - a. Living between Tolpuddle Street and Theberton Street?
 - b. Living between Theberton St and Holloway Road?
4. Do The Council have plans to offer Liverpool Road residents a consultation (or equivalent process) re:
 - a. Reversing neighbouring LTNs (due offset traffic)?
 - b. Closing their own street (or relevant part of the street) to traffic?
5. If yes, to either of these in question 4, please provide details as to how and when this will take place
6. If no to any of question 4, please provide what justification The Council is relying on for denying this.

7 What level of increase (if any) in traffic and pollution on 'main', 'boundary' or other 'offset traffic' roads would lead to Islington Council to reverse neighbouring LTNs?

ii For how long would such an increase need to be sustained in order for the Council to reverse neighbouring LTNs?
8. Prior to their implementation, did The Council project/predict an increase in traffic as a result of LTNs on any parts of the Liverpool Road?

ii If so, by how much?
9. Did The Council carry out a risk assessment re the impact of LTNs on residents of the Liverpool Road?

ii If so, what were the findings?

10. Prior to implementation, did The Council advise any Liverpool Road residents of a potential increase in traffic & pollution due to offset traffic from neighbouring LTNs?

11. What measures (if any) have The Council implemented or planned to mitigate appropriately the impact of increased traffic, pollution and noise on the Liverpool Road?

12. Did the Council collect the following data for any part of the Liverpool Road in the 5 years prior to implementation of nearby LTNs:

a. Traffic volume?

b. Pollution?

c. Traffic Speeds?

13. Is The Council aware of any data re question 12 via partners or other sources?

14. Can you please provide accurate data (and sources) for each element of question 12 including the time periods for which monitoring took place?

15. Did the council collect the following data for the Liverpool Road between Tolpuddle and Theberton Streets in the 5 years before the implementation of local LTNs:

a. Traffic volume?

b. Pollution?

c. Traffic Speeds?

16. Is The Council aware of any data re question 15 via partners or other sources?

17. Can you please provide accurate data (and sources) for each element of question 15 including the time periods for which monitoring took place?

18. Have The Council collected the following data for the Liverpool Road between Tolpuddle and Theberton St since the implementation of nearby LTNs (excluding the period of Covid restrictions)

a. Traffic volume?

b. Pollution?

c. Traffic Speeds?

19. Is The council aware of any data re question 18 via partners or other sources?

20. Can you please provide accurate data (and sources) for each element of question 18 including the times periods for which monitoring took place?

21. Can you please provide the exact locations of any monitoring along Liverpool Road between 2013-2023?

22. Can you please provide info re which monitoring sites on the Liverpool Road (if any) The Council relied upon in their published data justifying LTNs?

23. Have the council monitored increases in vehicular noise as a result of offset traffic due to neighbouring LTNs:

a. On the Liverpool Road?

b. Anywhere else in Islington? (Please provide locations)

24. Can you please provide known data re numbers of Liverpool Road residents that fall within these categories:

a: known disability status (or other recorded vulnerability)

b lower socio-economic status

c: Under 18s

d: pensioners

25. Does The Council know of data indicating that residents of the Liverpool road are less affluent than the average Islington resident?

ii: please provide this data

26. If known, please provide a percentage (or estimated percentage) for the number of Liverpool Road residents with access to a private garden?

27. If known, please provide a percentage (or estimated percentage) for the number of Islington residents with access to a private garden?

28. Is or has The Council monitored health outcomes for residents of 'boundary roads', main roads or roads otherwise affected by offset LTN traffic vs residents within LTN areas?

ii If yes, please provide the findings

29, Are The Council aware of any increases in respiratory or cardiovascular health issues among residents of 'boundary roads', main roads or roads otherwise affected by offset LTN traffic in the years since the implementation of LTNs?

30. Does The Council consider the Liverpool Road 'residential'?

31. Does The Council acknowledge that since the implementation of LTN's (excluding lockdown periods) the Liverpool Road between Tolpuddle and Theberton Street has seen an increase in the following:

a: Traffic volumes?

b Pollution?

c Noise?

d Speeding?

e. Accidents?

32. If The Council does not accept any of the above, please provide data it's relying on for this.

33. Can you please provide The Council's justification for maintaining the present burden of traffic on the Liverpool Road?

34. Does the Council have plans which may increase traffic volumes on the Liverpool road further still?

35. Can the Council provide data on the number of vehicle and cycle accidents on the portion of Liverpool Road between Tolpuddle Street and Cloudsley Place for year since LTN's were implemented?

36. What mitigation efforts are planned by the Council if demonstrated that pollution and traffic has increased on:

a: The Liverpool Road?

b. New North Road?

37. How many emails from Islington residents voicing concerns re LTNs are yet to be addressed/responded to (Including those to Rowena Champion, People Friendly Streets and

other council depts)?

38 How many communications have the council received from Islington residents concerned

of a detrimental impacts to their health (or that of others in their household) due to LTNs?

39. Did the council rely on the notion of traffic 'evaporation' on 'boundary roads', main roads

or roads otherwise affected by offset LTN traffic, to justify the implementation of LTNs?

ii: Does is still do so?

40. Where it can be demonstrated that 'evaporation' has not occurred, had The Council initially intended to reverse LTNs?

41. On what date/s were LTNs schemes no longer deemed 'experimental' by The Council?

42. If the schemes are no longer 'experimental' can you please provide the Council's justification for making them permanent?

43. What measures has The Council planned to improve the lives of disabled, non-car owing residents living on boundary roads?

44. Which other outside agencies have the Council consulted with over the impact and consequences of LTNs on so-called 'boundary roads'?

45. Can you please provide data (with sources) re numbers of cyclists using the Liverpool road:

ii. before the implementation of the Cycleway?

iii. over the past year?

46. Did The Council carry-out (sic) any type cost/benefit analysis around LTNs that included reference to boundary road traffic or residents?

ii. If yes to the question above, can you please provide this data?