

Draft Network Management Duty guidance on implementing low-traffic neighbourhoods– ADEPT Consultation Response

May 2024

Introduction

This paper sets out the Association of Directors of Environment, Economy, Planning & Transport (ADEPT) feedback on the draft guidance to Local Authorities on implementing low traffic neighbourhoods¹ and accompanying Low Traffic Neighbourhoods Research Report published in March 2024.

ADEPT believes that this guidance will help facilitate the successful implementation of Low Traffic Neighbourhoods (LTNs) by local authorities (LAs) whilst minimising any unintended consequences on the local community. However, although the guidance highlights key themes and issues that LAs should take into consideration, it lacks clarity and detail in several areas. This ambiguity may lead to inconsistency in the delivery of LTNs by LAs.

The subsequent sections of the paper provide ADEPT's detailed comments on the draft guidance.

Perception of LTNs as anti-motorist

ADEPT acknowledges that implementation of LTNs in the past has on occasions led to considerable disruption within local communities and fostered a negative public perception of these schemes.

However, when implemented in a collaborative way, LTNs can create a safer, healthier and more pleasant environment for residents, visitors and workers in an area, offering a choice of transport modes. Properly implemented, LTNs can maintain vehicular access for those who need it while supporting active and sustainable transportation options.

The reference to LTNs as "anti-motorist" in the Secretary of State for Transport's forward to the document is not particularly helpful, as it has the potential to undermine the positive benefits that well-implemented LTNs can provide. When implemented correctly, LTNs should not be perceived as anti-motorist. Instead, they should be seen as a measure to help the local community, improve sustainability, and encourage through traffic to use more appropriate routes.

The guidance should reconsider reference to LTNs as anti-motorist.

The guidance should also provide further clarity on the importance of maintaining vehicular access for those who need it (e.g. access to residential properties and places of work and for emergency services).

Additionally, the guidance should emphasise that LTNs, if correctly implemented, should not result in significant disruption to motorised vehicles and vehicular traffic.

¹ <https://www.gov.uk/government/publications/implementing-low-traffic-neighbourhoods/implementing-low-traffic-neighbourhoods>

Community Support

ADEPT agrees that high quality and timely community engagement and public support is critical to the success of LTNs. It is important that issues faced by a community and their needs are fully considered before any LTN is implemented.

The guidance suggests that LTNs should only be implemented where there is “clear local support.” ADEPT believes this is open to interpretation and could lead to inconsistent outcomes—progression in one area but abandonment in another.

The guidance also recommends the use of objective methods such as professional polling aligned with British Polling Council standards. However, it is unclear from the guidance whether this approach should apply universally, as identifying controversial schemes without prior engagement may be challenging.

The cost and resources needed to implement these methods may also be challenging for stretched LA budgets. This could make it difficult for LAs to undertake the community engagement which is critical to progressing a LTN scheme. In addition, LAs are very experienced in delivering local schemes for communities and are able to understand local communities need and apply the relevant tried and tested consultation techniques as appropriate.

ADEPT support the guidance’s position on the need for local community engagement and support. Rather than being prescriptive, the guidance should empower LAs to determine the local level of support required and use the appropriate techniques to measure this.

Impact on motorists

The guidance emphasises that LTNs should not be implemented if they would create “undue problems for drivers”. The guidance defines LTNs as areas where through traffic is reduced or removed. It is therefore inevitable that LTNs will cause some level of disruption and potentially, inconvenience for drivers.

ADEPT’s position is that the impact on drivers residing or working in the local area of an LTN scheme should carry more weight than the impact on drivers who merely use a route as a shortcut. As such, this statement should specifically apply to motorists who will continue to have access to residential properties or work premises, rather than those merely passing through the area.

The guidance should provide further clarity on the level of impact on drivers and motorists that is considered to be unacceptable.

Feedback that has informed the guidance

Feedback collected during the rapid evidence review did not include input from groups representing older people, freight operators, young individuals, and bus operators. These groups could have provided valuable feedback for the review and subsequent guidance.

LAs should actively seek input from these groups as part of community engagement during the development of an LTN scheme. However, to help minimise abortive work, it is important that lessons learned from previous LTN schemes are also incorporated into the guidance.

The guidance should ensure that it does not conflict with the needs of groups who did not provide feedback into the rapid evidence review.

The guidance should capture the lessons learned from previous LTNs. This will help minimise abortive work on future schemes.

Clarity on when a LTN should or should not be considered for implementation

The research report notes that LTNs are designed to reduce traffic and create safer environments. It also indicates that most residents considered traffic-related problems to be a serious problem where they live. However, this feedback does not feature in the statutory guidance.

The statutory guidance is silent on when and where LTNs should be considered, and perhaps more importantly, where LTNs should not be implemented.

The guidance should provide context on why LTNs should be considered in the first place. This will help ensure that LTN schemes are not progressed in unsuitable locations.

Updates to Digital Maps

The guidance makes reference to contacting digital map providers and informing them of updates. It should be noted that any changes to third party mapping used for purposes such as satellite navigation is outside the control of LAs. In addition, a lack of resources is likely to make it unviable for them to contact individual mapping providers to inform them of the changes.

The guidance on updating digital mapping providers of changes to the network is considered to be too onerous and not feasible for LAs.

Review of LTN Schemes following Implementation

A timely review of the scheme following implementation - such as 6 months or 12 months - is considered appropriate. However, a continuing formal annual review of LTNs through engagement, as set out in the guidance, is considered to be very onerous an inappropriate use of finite resource and funding available to LAs.

Guidance on reviewing LTN schemes is considered to be too onerous and unlikely to be feasible for most LAs.