

Environmental Information Regulations (EIR) Request  
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Date: 31 August 2023  
Ref: Sent by email from [enquiries@theccc.org.uk](mailto:enquiries@theccc.org.uk)

Climate Change Committee  
1 Victoria Street,  
Westminster, London,  
SW1H 0ET  
w [theccc.org.uk](http://theccc.org.uk)

### Your request:

Could you please provide me with any emails that discussed LTNs - low traffic neighbourhoods from the last three months.

### Our response:

Thank you for your request. We have handled your request under the Environmental Information Regulations (EIR) 2004. Please find our response below.

The information requested has been considered environmental information, given it covers measures (including administrative measures), such as policies, legislation, plans, programmes, environmental agreements, and activities affecting or likely to affect factors, such as substances, energy, noise, radiation or waste, including radioactive waste, emissions, discharges and other releases into the environment.

Under regulation 12(4)(e), we have excluded internal communications from this request. This is because when considering the public interest test, the balance is that protecting internal decision-making processes of the Climate Change Committee outweighs the interest to the public of releasing any internal communications discussing this topic.

Under regulation 5(3), personal information from junior CCC staff and external contacts has been removed.

All relevant correspondence that refers to Low Traffic Neighbourhoods (LTNs) is set out in date order in annex A.

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Information disclosed in response to this FOIA request is releasable to the public. In keeping with the spirit and effect of the FOIA and the government's Transparency Agenda, this letter and the information disclosed to you may be placed on the CCC website, together with any related information that will provide a key to its wider context. No information identifying you will be placed on the CCC website.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. If you are not content with the outcome of the review, you

may apply directly to the Information Commissioner for a decision. In keeping with our transparency policy, the information released to you will be published on [www.theccc.org.uk](http://www.theccc.org.uk). Please note that this publication will not include your personal data.

Kind regards,  
Climate Change Committee

## Annex A – correspondence

### Email chain 1

From: [Name redacted] <[email redacted]>

Sent: 26 May 2023 13:22

To: [Name redacted] <[email redacted]>

Cc: [Name redacted] <[email redacted]>

Subject: Active travel cut JR & RIS3

Hi [Name redacted]

Hope all's well with you and work on the Progress Report. I have two matters worth sharing for it.

Active travel

TAN is preparing to JR the March funding cut for active travel - see attached PAP letter, please treat as confidential. An NAO active travel report is due out on 7 June and, with even DfT's July 2022 CWIS2 update to Parliament forecasting just 41-47% active modal share by 2030, far short of the 50% assumed in the NZS & CBDP (how then can savings be quantified??) even before this funding cut. DfT is clearly facing huge difficulties in defending its position.

Your progress report might consider calling for:

Not only restating the 50% target but also having a higher target as a contingency if other sectors fail to deliver. That could be simply a higher percentage or also consider all trips (i.e. not just *short* trips, in other words considering trip length reduction and bike+PT, and/or *national*, i.e. not just urban but also include rural). IMHO widening the target would be more achievable than increasing it, as that broadens the enablers that could be harnessed.

Major increases in funding for rest of CWIS2 (to March 2025) to account for (i) even the original (before March cut) funding being inadequate (ii) construction inflation (iii) lots of funding going on temp schemes, many of which are now gone (similar argument to lots of bus funding plugging gaps during Covid as opposed to delivering long term growth).

Set specific infrastructure targets for 2030, i.e. the expected end of CWIS3, as a milestone towards the long promised but still totally unspecified world class active travel network by 2040. We don't need cycling towns in same way as electric bus towns, there's already Cambridge etc. for that. But besides a bigger spread of network infrastructure, might be worth having an e-bike (sub-)region, testing out potential for continental style super cycleways linking built up areas.

Widening the tools and levers for local authorities not restricting them - i.e. as code to criticise DfT's announcement last Friday that it is no longer funding Low Traffic Neighbourhoods, but also to consider more radical changes to highways rules, as the UK is decades behind continental countries. Given how far we are off the 2030 target, we need to find more ways to pick up pace.

RIS3

Doubt you'll have had time to look at this new mega-consultation, I'll try to share a briefing next week but thought that might be too late. Initial headlines are

The rhetoric of doing all they can on climate is nonsense. There's still no user carbon target (beyond the economy wide 2050 net zero), despite the acknowledgement that 98.3% of network emissions are from users. Such a target was proposed in RIS1 in 2014. A 2030 RIS3 user carbon target should be your top ask. NH had proposed 30% in its Net Zero Highways plan but DfT rejected that. Need to recalculate what might be needed to credibly meet the 2030 NDC, given lack of progress in other sectors, 60%??

The claim to focus on small schemes is as much spin as the NPS PR that said the draft took climate seriously (while telling decision makers to ignore scheme climate impacts). The reality is most RIS3 enhancement spend is delayed RIS2 schemes. There are also 31 schemes in the RIS3 pipeline (developed in RIS2) that haven't been cancelled and may be moved into RIS4.

The thrust of the small schemes proposed are pinchpoint schemes and dualling masquerading as road safety. Beyond that there is a restatement of the RIS1 expressway aspiration to dual all single carriageway trunk roads. Indeed some regional papers are now describing such ambitions as small!

The documents are full of inconsistencies, e.g. saying we must explore all alternative options to road-building then that routes need to be consistent (i.e. dualled all the way with grade-separated junctions). The rhetoric on considering no-build alternatives as part of PAS2080 sounds good but then that would require radical change to the NNNPS (not least many things TAN is asking for) as well as cancelling current schemes, especially as they have massive cumulative impacts while traffic and construction is still so high carbon.

The combination of finishing existing schemes and dualling single carriageways would have a huge price tag as well as carbon impact. This does all make the claims of a shift to support active travel and public transport even less credible as there simply won't be funding left over. Moreover the route strategies published alongside are really poor, still failing to integrate other modes' needs (beyond generic safety concerns). We've been promised NH widening travel choice since 2014, how will it ever happen while big road schemes wag the tail?

On freight, still only proposing to start rolling out solutions from 2030, by which time the EU will have rolled out HGV charging every 60km on key routes. Though there's multiple promises of an electric motorway trial, something Logistics UK was keen on at Innovation Zero conf yesterday, NH's director Adam Simmons then denied they had any plans to actually do this and instead would simply watch Europe.

In short it's a lot more greenwash, the leopard certainly has not changed its spots to stripes. To be fair, some academics do acknowledge NH is a leader on PAS2080 in terms of assessing its construction, maintenance and renewals (i.e. the 1.7% of emissions). But if traffic was cut by 20%, there would not be the same need for resurfacing let alone new schemes, so that would have a bigger impact even for that 1.7%.

I've also attached TAN's evidence for the Transport Committee inquiry - please also treat as confidential, until it is published, likely to be early June. Appreciate it's rather long but the key content for you is

conclusions and recommendations at the front

q 1 & 5

para 62 on cumulative impacts

Hope that's helpful, do let me know if you have any questions or comments,

all the best

[Name redacted]

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## Email chain 2

From: [Name redacted] <[email redacted]>

Sent: 21 June 2023 17:08

To: [Name redacted] <[email redacted]>

Cc: [Name redacted] <[email redacted]>; [Name redacted] <[email redacted]>

Subject: RE: Modal shift estimate question for the CCC progress report

Hi [Name redacted],

No problem at all with you getting in touch directly – we're always happy to help out where we can.

The short answer to your question is no – next week's Progress Report will not include any updated quantified estimate of the amount of traffic reduction/modal shift that will be required to meet the Sixth Carbon Budget pathway. We are, however, beginning our analysis for our advice on the Seventh Carbon Budget (due in 2025), which will consider this question in detail.

Now for a slightly longer answer ... The focus in the Progress Report is on three things in main: (1) The Government's revised emissions pathways presented in its Carbon Budget Delivery Plan (CBDP), and how these compare to our view on what is needed; (2) An update of our delivery monitoring indicators to highlight where things are/are not progressing at the pace needed; and (3) An assessment of the credibility of the Government's proposed policies to deliver against its pathway. As you would expect, these points will highlight a number of the points you've mentioned below, but the most relevant here are as follows:

- We will be highlighting the fact that much of the emissions reduction that the Government had attributed to modal shift in its Net Zero Strategy has been removed from their quantified pathway in the CBDP, instead being included in a separate table of unquantified measures. We will emphasise that this reduces our confidence in the Government's commitment to these policies and that our assessment is that it is crucial that clearer policies (and quantified ambition) for modal shift should be developed in order to meet the Sixth Carbon Budget and realise a range of co-benefits.
- We will observe that car traffic post pandemic seems to be levelling out at around 8% below 2019 levels, but that in the absence of any policies to build on this, long-standing trends towards traffic growth are likely to resume, undermining the emissions savings that this has driven (and likely falling off-track compared to our pathway).
- We will be critical of the substantial risks that we see from the policy landscape around travel demand, arising from missing policies, delays to key decisions, and counterproductive actions. These include:
  - o In general, the Government appears reluctant to develop clear policy on reducing car traffic growth (despite having stated this as an aim). Therefore, their delivery pathway is heavily technology-focussed, which we have highlighted as increasing delivery risks, potentially increasing costs, and risking falling short of the sector's contribution to the Sixth Carbon Budget.
  - o Delays to issuing guidance to local authorities on the development of local transport plans and how these should deliver quantifiable carbon reductions. These could have been (and perhaps could still be) fundamental to achieving meaningful modal shift in practice, but the substantial delays (we're now two years on from the Transport Decarbonisation Plan's commitment) have put this at considerable risk.
  - o The public transport system is currently not providing the appealing alternative that is needed (strikes, service cuts, fare costs), and despite isolated positive actions (e.g. the £2 bus fare cap) there appears to be no cross-cutting vision for how the

transport system as a whole (encompassing public, active, and shared modes) can provide a credible alternative to car travel.

- We do also highlight some positives, notably the early steps taken by Active Travel England and the success of various low-traffic neighbourhoods. But these too frequently are accompanied by negatives as well – in this case, the cuts to the active travel budget and the Government's reluctance to endorse various local traffic/emissions reduction schemes (most notably the ULEZ).

Your interpretation of the figures in the Sixth Carbon Budget report is correct – these were the percentage reductions in car travel that we assessed as being reasonably possible to achieve. This was based on an assessment of what share of the various types of journey being made by car (using the National Travel Survey dataset) could credibly switch given a moderately supportive policy and cultural landscape. These were then the assumptions that were used within our Balanced Pathway. A more ambitious set of assumptions (reflecting more supportive policy or a more engaged and proactive public) was applied in our Widespread Engagement scenario.

Since this analysis was conducted, EV market share has actually tracked ahead of our assumed pathway, although the market has been suppressed by semiconductor shortages meaning that total EV volumes are only roughly in line with where we expected. Meanwhile, there has been very little progress on policy to reduce car demand (see above), but there has been a pandemic, which means that car-kilometres are also roughly on track relative to our assumed pathway. However, without action this will likely quickly fall off track, and other impacts of the pandemic (most notably impacts on local bus services) may now make our modal shift scenarios harder to achieve. We will be considering how to reflect all of this in our updated analytical pathways for the Seventh Carbon Budget. We're about to start the thinking on these, likely starting off with a few roundtable-type discussions over the next 6-8 weeks – if you'd be interested, I'd be very interested to hear your/colleagues' thoughts at one of these.

Best,

[Name redacted]

[Name redacted]

[Role redacted]

Climate Change Committee

m [Tel redacted]

[theccc.org.uk](https://theccc.org.uk) | [@theCCCuk](https://twitter.com/theCCCuk)

From: [Name redacted] <[email redacted]>

Sent: 21 June 2023 16:28

To: [Name redacted] <[email redacted]>

Cc: [Name redacted] <[email redacted]>; [Name redacted] <[email redacted]>

Subject: Modal shift estimate question for the CCC progress report

You don't often get email from <[email redacted]>. [Learn why this is important](#)

Hi [Name redacted],

We met at a couple of NGO events recently, hope you don't mind the direct approach.

I'm aware the CCC's next progress report will be published next Wednesday. My question is: can you say whether this will include an updated estimate of how much traffic reduction/modal shift is required to meet the balanced pathway?

Figure A3.1.a on p. 46 in the 6<sup>th</sup> carbon budget report showed that: "Compared to baseline growth, we assume that approximately 9% of car miles can be reduced (e.g. through increased home-working) or shifted to lower-carbon modes (such as walking, cycling and public transport) by 2035, increasing to 17% by 2050."

Am I correct that this is the estimate of what *can* be achieved rather than what is *actually needed* to meet the balanced pathway?

My sense is that, since this was published in December 2020, EV uptake has not been as fast as hoped due to the cost of living and supply issues, and the ZEV mandate was not as ambitious as needed, therefore making the required traffic reduction even greater. But we don't have a definitive number of traffic reduction needed. Will the progress report provide that?

I am aware that Greg Marsden's recent 'Reverse Gear' report did an analysis of where we are, given the latest government data and policies. This suggested "the only pathways which align with the CCC's assessment of the necessary contribution from surface transport include a 20% traffic reduction by 2030". But it would be very helpful to have the CCC's calculation of this.

Would you be able to let me know whether this might be coming in the report in advance, so we can prepare a suitable response?

Thanks,

[Name redacted]

[Name redacted]

[Role redacted]

M: [Tel redacted]

@[personal social media account redacted]

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**Email chain 3**



From: [Name redacted] <[email redacted]>  
Sent: 29 June 2023 09:21  
To: [Name redacted] <[email redacted]>  
Subject: Low Traffic Neighbourhood research

You don't often get email from <[email redacted]>. [Learn why this is important](#)

Good morning

Congratulations on your latest report, it is an impressive and important document although depressing that there hasn't been more progress.

As a sustainable transport academic, I was interested to see you mention low traffic neighbourhoods (LTNs) as one type of intervention that can reduce transport carbon emissions. In addition to the study you cite, you may be interested in this even more recent piece of work, which estimates that residents inside LTNs reduced their annual motor vehicle mileage by 6% relative to a control group. It speaks directly to your point that these measures are one way to reduce total surface transport emissions (alongside bringing, as you note, important health cobenefits).

<https://findingspress.org/article/75470-the-impact-of-2020-low-traffic-neighbourhoods-on-levels-of-car-van-driving-among-residents-findings-from-lambeth-london-uk>

All the best

[Name redacted]

[Name redacted]

Department for Population Health

London School of Hygiene and Tropical Medicine

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#### Email chain 4

From: [Name redacted] <[email redacted]>  
Sent: 25 July 2023 18:04  
To: [Name redacted] <[email redacted]>  
Cc: [Name redacted] <[email redacted]>; [Name redacted] <[email redacted]>  
Subject: Feedback from sector teams on policy support questions

Hi [Name redacted],

As promised here some feedback on questions that sector temas would like to see included in polls around policy support. I am also copying in suggestions around wording of existing questions, but I appreciate that this may not be relevant if you can't change existing questions (but probably also useful going forward). I hope this is useful.

Best,

[Name redacted]

Existing questions with suggested changes in colour:



1. Making vegetarian and vegan options mandatory in canteens and restaurants → Question 1 could also specifically ask about vegetarian/vegan options being mandatory in public sector settings such as schools and hospitals.
2. Shifting subsidies away from meat production to plant or grain producing agriculture → Shifting subsidies away from meat production to plant or grain producing agriculture crop production
3. Encouraging research on alternative meat sources such as lab grown meat → Funding more research...", since encouraging research would essentially just mean providing more funding to research centres – so it's a bit clearer
4. Introducing food labelling systems that show the carbon emissions of food products → Question 4 in this sense maybe tricky as it suggests food ghgs are valued over wider biodiversity or other environmental pressures, when really a holistic approach to the food system is needed.
  - a. I personally probably disagree with making survey questions that complex and think it makes more sense to ask about carbon labelling specifically as you do, but have included it as feedback as well
5. Increasing the price of meat products → ask more specifically about tax on meat (as a policy, rather than price)?
6. Stopping airport expansions
7. Reducing road space for cars and increase space for cycling and walking → I wonder if "Reducing road space for cars and increase space for cycling and walking" could have an example of what this might mean (e.g. is this referring to stopping car use in certain areas like a Low Traffic Neighbourhood, introducing cycle lanes by reducing road space, creating bigger pavements etc?)
8. Introducing higher road charges that would be used to improve public transport
9. Phasing out the sale of petrol and diesel cars in favour of electric or hybrid ones → should hybrid be included? I'm wondering as this statement makes it seem as though hybrid cars are as environmental as electrics – but these will be phased out by 2030 too. + I would also favour just saying "in favour of electric ones" rather than including hybrids, as hybrids (of some form, still TBC) will only continue to be allowed for five years beyond 2030 (and we have made the argument that it would be better if this five year exemption were not allowed). Focussing just on electric cars would give more insight into people's support for the long-term solution.
10. Phasing out the sale of gas/coal boilers in favour of heating systems using renewable energy → this should probably be gas/oil boilers?
11. Building regulations to force developers to install low carbon heating and cooling systems in new homes
12. Subsidies to help people insulate their homes → It'd be great if (12) could be broken down into the perception of grants vs tax discounts (stamp duty discount, council tax discounts) for energy efficiency improvements in home. If breakdown isn't possible different wording?: Access to grants or tax discounts (e.g. Stamp Duty Discount, Council Tax Discount) to help people insulate their homes

13. Changing product pricing to reflect how environmentally friendly products are (e.g. lower prices for low carbon products)
14. Regulations to require products to be more reusable, repairable, and recyclable

Policy options that teams would like to see questions on:

- Applying a frequent flier levy
- Would be great if there could be broader questions on flying, e.g. do you support increasing the cost of flying to reflect emissions impact (again with an explanation of how this doesn't currently happen). The frequent flyer levy question could be expanded to a preference question e.g. options for increasing the cost of flying, ranked in order of preference.
- Something about private flying (e.g. should it be more transparent or limited?)
- Would relatable consumer information on emissions at the point of booking for different forms of travel help inform decisions?
  - o I guess this one could be phrased as a policy option or explored differently in other projects
- Putting in place schemes that encourage active travel (e.g. cycle hire schemes)
- It might be nice to add something about support for local transport schemes – e.g. support for a low-traffic neighbourhood in their area.
- Another question which would be interesting would be something around flexibility, i.e. how variable tariffs might influence how people use energy
- Something on reducing the cost of rail travel might also be useful + I agree that something on public transport fares/affordability could be valuable. The challenge is framing it as a meaningful question – if you simply ask about support for reducing fares, then everyone will say yes!

Wider comments:

- Something I'm interested in is the social contagion of behaviours relating to household energy use. So questions like "Do you know someone who has insulated their home in the past year?" or "Have you heard news stories about heat pumps in the past year" could potentially tell us more about public understanding of these things
  - o I know we have spoken about this and I remember that a question about it was included in one of your other projects. I will also try to find it and send the results on to the buildings team (if already published), who made this suggestions. But good to know that this is of interest
  - o From [Name redacted]: In the past, I've used measures of "information exposure" behaviours to capture this – e.g. you'd ask someone how many times in the past 3 months that they had heard/ come across information about heat pumps from various sources (newspaper, friends & family, online news, billboards, social media, work colleagues etc). You can then see the breakdown of information sources, or make a total "exposure" score.

- You could also ask them about “information seeking” behaviours, using the same questions just asking how many times they had specifically sought out information about something, from various sources.
- I'm unfamiliar with their work, but it will be important to ensure the interventions they include in the survey are properly explained, e.g. what a frequent flyer levy is (if included).
- feedback comes with an assumption that questions will be set in a way that the respondents have an accurate picture of what they are being asked about.
- It would be really helpful to get a sense of public opinion of the outcomes we'd hope to see as a result of diet change – for example landscape change to increasing tree cover where it had previously been sparse, support for the rewilding of land and/or large-scale restoration of ecosystems, and the use of agriculture land for renewables. This would be helpful as we explore the tensions between climate, farming and nature, and what society expects from land.
- Testing harder actions would probably tell us more about where attitudes are right now (ie. Framing questions in terms of funding, obligations, bans, etc

[Name redacted]

[Role redacted]

Climate Change Committee

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#### Email chain 5

From: Stark, Chris <[email redacted]>

Sent: 28 July 2023 11:11

To: Social and Environmental Justice <[email redacted]>; [Name redacted] <[email redacted]>

Cc: Office, Private <private.office@theccc.org.uk>; [Name redacted] <[email redacted]>

Subject: Re: Your recent report

Thanks [Name redacted]. I've copied to [Name redacted], who leads our transport work.

We don't tend to undertake studies ourselves - we're more reliant on published work - but this has still been a useful exchange in framing some of the work that will feature in our advice on the new UK emissions pathway (due in 2025).

Chris Stark

Chief Executive, Climate Change Committee

@ChiefExecCCC | [Tel redacted]

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**From:** Social and Environmental Justice <[email redacted]>  
**Sent:** Friday, July 28, 2023 7:10 am  
**To:** Stark, Chris <[email redacted]>  
**Cc:** Office, Private <[private.office@theccc.org.uk](mailto:private.office@theccc.org.uk)>; [Name redacted] <[email redacted]>  
**Subject:** Re: Your recent report

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Dear Chris,

Thank you for your detailed response.

What I think is still missing is in-depth research into the impact of LTNs on total mileage driven which of course is the critical thing for climate emissions. Goodman's study attempted to do this but it was a small study based in Inner London which may not be typical of the rest of the country.

Total mileage driven would not necessarily be captured by what is happening on boundary roads. It would need to look at wider traffic patterns. I believe it would be a useful study to do in view of the fact that car ownership is increasing within many LTNs and in the light of the Department for Transport's view that LTNs are not designed to reduce overall mileage travelled.

I don't know if this is the sort of work the CCC might be interested in doing.

Best regards,

[Name redacted]

On 27/07/2023 20:37 BST Stark, Chris <[Email redacted]> wrote:

Dear [Name redacted],

Thank you for your email. My apologies, but I don't believe I received your first email.

As you have noted, we observed in our recent Progress Report that local schemes such as low-traffic neighbourhoods may have contributed to maintaining some of the traffic reduction seen during the pandemic. This is based on an emerging body of evidence, including - but not limited to - the Possible study you mention, which shows that LTNs reduced traffic and improved local air quality.

The Possible study assessed traffic levels in and around 46 LTN schemes across London and found average reductions in traffic within the schemes of around 33-47%. By contrast, traffic levels on the boundary roads studied were found to have remained relatively constant on average. We felt this provided strong evidence of a reduction in overall traffic levels, and was supported by other studies such as [this study](#) which concluded that residents in Lambeth reduced their driving after their area became an LTN and [this study](#) which found overall traffic reductions both within and on the boundary of three schemes in Islington. The Centre for London article you linked below also concludes that there is strong evidence that LTNs can reduce motor traffic.

We agree that in some cases some traffic can be displaced onto boundary roads. This is evident in the Possible study, which notes substantial variation in changes in boundary road traffic. However, this does not occur for all schemes, with some LTNs also seeing decreases along boundary roads and the average boundary impact being relatively flat, while the Centre for London research concludes that any displacement tends to reduce in the medium-term as the total number of car journeys is reduced.

These are local schemes whose effectiveness will vary based on the local context. We would agree that it is important that this context is taken into

account when designing schemes, to ensure that the impacts of any displacement are minimised to thereby maximise the emissions and air quality benefits resulting from the scheme's implementation.

I hope this has been a useful reply.

Chris

Chris Stark

Chief Executive, Climate Change Committee

@ChiefExecCCC

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From: Social and Environmental Justice <[Email redacted]>

Sent: Wednesday, July 26, 2023 9:46 am

To: Stark, Chris <[Email redacted]>

Subject: Re: Your recent report

You don't often get email from <[Email redacted]>. [Learn why this is important](#)

Dear Chris Stark,

I understand you have been on holiday.

We look forward to a reply to our email.

Regards,

<[Name redacted]>

On 03/07/2023 11:08 BST Social and Environmental Justice <[Email redacted]> wrote:

Dear Chris Stark,

We are concerned that your endorsement of Low Traffic Neighbourhoods in your recent report was based on a single analysis of LTNs, commissioned by Possible. This took a broad brush view of LTNs schemes and did not appear to take into account that in many cases significant volumes of traffic are displaced onto boundary roads and wider areas:

(<https://www.smarttransport.org.uk/whitepapers/latest-whitepapers/changes-in-motor-trafficinside-london-s-ltns-and-on-boundary-roads>)

The Centre for London published a report in 2022 which stated:

Overall the evidence shows big reductions in car traffic inside LTNs, but the picture is more mixed for boundary roads – some seeing increases in traffic and others seeing decreases. How much traffic is displaced onto nearby roads can vary hugely – not only from scheme to scheme but from street to street. In some cases boundary roads have seen big increases in traffic. No matter how effective low-traffic neighbourhoods are, they can't remove our reliance on the private car alone. Although they suit local streets, they do little to reduce the traffic on main roads, and in some circumstances can displace traffic into them. They also do not facilitate longer trips that may be challenging to make by public transport or active travel. (<https://www.centreforlondon.org/wp-content/uploads/2022/06/CFL-StreetShift-LTNs-Final.pdf>)

We have concerns about the environmental & climate justice impacts of this displacement as some LTNs relocate traffic from affluent areas of high car ownership into deprived neighbourhoods.

As (to our knowledge) neither the government nor councils are measuring total mileage driven across LTN areas, it is not possible to gauge whether they are effective in reducing greenhouse emissions at this stage.

We would appreciate the opportunity to discuss this with you or one of your team.

Yours sincerely,

SEJ directors

Social and Environmental Justice

[socialenvironmentaljustice.co.uk](https://socialenvironmentaljustice.co.uk)

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