

REPORT OF THE LIVING IN HACKNEY SCRUTINY COMMISSION		
Review into Air Quality Living in Hackney Scrutiny Commission– 10th July 2017 Cabinet – 18 th September 2017 Council - TBC	Classification Public	Enclosures Appendix 1 - Notes of focus group discussions on road closure and filtered permeability schemes

1. FOREWORD

The reason for selecting air quality as our substantive review for 2016/17 was clear. Many areas of Hackney and London see levels of air pollution which are beyond legal – let alone safe – levels. It is the cause of ill health and early death.

Transport is the main cause of air pollution both in the borough and the areas surrounding it. It was right therefore that this area took significant focus. We explored two areas that there is significant interest in – work to filter traffic from narrow residential roads and the approach of the Council to parking management in terms of establishing controlled parking zones.

On filtered permeability we reach a view that well thought out and designed schemes need to be supported. Evidence shows that these can reduce traffic (and therefore pollution) on an overall level, and move remaining vehicles onto roads where the effects of their emissions are less impactful. We have also been convinced of wider health and environmental benefits that schemes can deliver.

This view is reached despite us having heard first hand from residents the detrimental impacts that schemes can deliver for some. We have real concerns around these – in particular where residents living on similar roads to those which have been ‘treated’ have suffered from significant displacement of traffic onto their roads. This has impacted on the quality of life of some of our residents and this needs to be fully acknowledged. We support the work of the relevant Cabinet Member in seeking solutions.

On parking, we reach a view that the presence of uncontrolled parking in a small area of the borough is likely to have detrimental air quality impacts; both in the uncontrolled area and on the routes that are used to access them. The lack of parking controls in some areas coupled with the much stronger transport links now available can encourage some to use these uncontrolled areas as park and ride stops in their movement to locations inside the borough and beyond it. Greater parking control would help to address this issue. We have also been convinced that it would help to deliver wider health benefits in addition.

Our review found some gaps in other areas which recommendations in the report seek to address. Whilst the Council promotes a system alerting subscribers to high

pollution levels and delivers marketing of a range of initiatives relevant to the air quality agenda, we found that there was no overarching communications approach in place.

On Planning, whilst the Council has strong range of policy apparatus in place, we found that there was room for greater collaboration between services to better ensure that air quality considerations play a full part in the decisions made.

Our review has shown that the Council can and does contribute to tackling air quality.

However, it has struck me just how much the making of substantial progress is reliant on change at a London and national level. We are supportive of the transport related initiatives which the London Mayor has announced although we do make recommendations that the Council lobbies him to go further. On a national level, action by Government appears to be severely lacking. Their funding of a diesel scrappage scheme and policy change to enable London to apply greater environmental pricing to road tax charges would be a start towards turning this around.

Cllr Sharon Patrick
Chair, Living in Hackney Scrutiny Commission

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1. INTRODUCTION

- 1.1. Air pollution levels in many parts of Hackney and London exceed legal limits.
- 1.2. 31% of the borough is found to have concentrations of NO₂ which are above National Air Quality Objective levels, although the Council suspects this to be an under estimation¹. Levels in parts of the borough are significantly above legal limits.
- 1.3. The health impact of the issue is significant. It is estimated that it caused the equivalent of up to 9,400 deaths in London in 2010. Hackney specific data on health impacts are limited. However it is estimated that long term exposure to particulate matter (PM2.5) alone is attributable to 5.6% of mortality in the borough. This is 39% higher than the UK average and ranks as the 8th worst in London².
- 1.4. Children are one of the groups most vulnerable to the effects of air pollution.³ It is estimated that 443 schools in the capital are in areas exceeding safe air quality levels.
- 1.5. There are a number of drivers of air pollution in Hackney (and other similar inner city areas). These include Domestic and Commercial gas systems and construction activity. However, road transport is (at least currently) the key cause⁴. Within transport, diesel vehicles are the most polluting.
- 1.6. Delivering the significant air pollution reductions needed to make our air safe will require change on a London wide and national level.
- 1.7. Whilst traffic is the largest contributor to air pollution in Hackney, data suggests that Hackney motorists are not the main cause. Evidence points to the majority of traffic in the borough originating from outside the area. Rates of car ownership and (despite recent population growth) the number of vehicles registered here have fallen. The great majority of our residents do not use a car to get to work.
- 1.8. Initiatives such as greater charging for or banning of polluting vehicles from entering polluted areas, road pricing, and scrappage schemes facilitating the removal of polluting vehicles without unfairly penalising consumers, will be required to deliver the sea change needed. These initiatives cannot be delivered by Hackney Council in silo.

¹ 2013 data sourced from Hackney Council Air Quality Action Plan and reported to the Commission - <http://mginternet.hackney.gov.uk/documents/g3749/Public%20reports%20pack%2017th-Nov-2016%2019.00%20Living%20in%20Hackney%20Scrutiny%20Commission.pdf?T=10>

² Public Health Outcomes Framework benchmark tool source referenced in submission to the Commission - <http://mginternet.hackney.gov.uk/documents/g3749/Public%20reports%20pack%2017th-Nov-2016%2019.00%20Living%20in%20Hackney%20Scrutiny%20Commission.pdf?T=10>

³ Air pollution: outdoor air quality and health NICE guideline, Draft for consultation, December 2016 - www.nice.org.uk/guidance/GID-PHG92/documents/draft-guideline . Other groups most vulnerable are older people, and people with chronic health problems

⁴ Within both Greater and Central London transport it is the largest source of Nitrogen Dioxide (NO₂) and Oxides of Nitrogen (NO_x) and particulate matter (PM10) emissions. For Hackney, modelling suggests that 55% of NO_x emissions in the borough are emitted from major and minor roads.

- 1.9. Given the need for regional and national action, this review does seek to explore the extent to which the GLA and the UK Government are taking up the mantle, and anything that the Council can do to encourage this.
- 1.10. However, as a group of local Councillors we did want to focus predominantly on areas in which the Council has a direct role to play.
- 1.11. We were already aware of some of the broad range of work being done to affect change on a local level to the extent that this is possible. This includes initiatives to severely limit the number of additional motor vehicles which new housing development might otherwise bring into the borough, working with businesses to reduce their transport-related emissions as a result of their operations, and by continuing to improve cycling infrastructure. There are many others and we will not do justice to them all by listing them.
- 1.12. We feel that these and other schemes have helped contribute to changes regarding car ownership levels and modes of travel. We feel that this work is likely to have lessened the overall levels of air pollution that there otherwise would be.
- 1.13. However, for the purposes of this review, we decided to focus mainly on two areas within transport – on filtered permeability and on parking management. These were selected due to an awareness from our roles as local Councillors that there has been recent and significant public interest in them.
- 1.14. Filtered permeability (or those being considered within this review) schemes work within a concept that networks for walking, cycling and or public transport should be more permeable than the road network for motor vehicles. They include schemes which close roads to through motor traffic whilst allowing movement through by bike or foot.
- 1.15. Reallocating space from general traffic can, it is argued, encourage walking and cycling by offering a more attractive environment for these modes. They can help create areas that are safer and free from motor traffic, and help to give cleaner methods of transport a time and convenience advantage over car driving.
- 1.16. Our review was being carried out at the same time that the Council (with Transport for London (TfL)) was live trialling two significant filtered permeability schemes in the De Beauvoir and Wordsworth Road area. As a group made up of local Councillors the Commission was aware that these schemes were the subject of contrasting views from the local community as to whether they were beneficial to the area.

- 1.17. We also noted that the Council's Transport Strategy⁵ sets out filtered permeability as a vehicular restraint tool which it will use as one of the measures to help mitigate the road-related impacts that population and employment growth in this area and others will have. The Liveable Neighbourhoods Plan⁶ within the Strategy also commits the Council to investigating feasible additional locations for schemes. This is to help progress the aim of creating environments which are more free of through traffic and rat-running, which facilitate sustainable travel behaviour, and which are safe, healthy and pleasant to live in, work and visit.
- 1.18. Within an exploration of air quality, this review set out to explore the capacity of filtered permeability schemes to help answer the traffic-related air pollution problems in the borough. Part of the reasoning for selecting this was due to concerns raised around a previous scheme proposed by the Council in the London Fields area around it having negative impacts on pollution levels.
- 1.19. We also wanted to investigate how decisions on schemes are made and (given the debate existing within the community regarding them) the approaches of the Council and TfL to engaging with those who they would affect, and to gain an indicative insight into the experiences of those supportive and not supportive of schemes in their areas.
- 1.20. Regarding parking, Parking Zones are areas where all kerbside space is controlled by either yellow lines or parking places. Parking Zones are the avenue through which the Council delivers controlled parking.
- 1.21. With some exceptions, vehicles parking in bays are required to display a parking permit. Permits are generally made available to residents living within the zones but not those living outside of it⁷. The majority of the borough is now covered with controlled parking, with uncontrolled areas mainly restricted to some wards in the north.
- 1.22. The Council states that parking zones have been introduced to 'improve parking conditions for local residents and businesses' and to 'help traffic, pedestrians and cyclists move safely in the borough'. We were also advised that dialogue continued with residents living in remaining areas with uncontrolled parking was also linked with aims to improve air quality by reducing unnecessary vehicle movements, including commuting.
- 1.23. We wanted to explore this aspect further. This was to gauge any available evidence on the impact or not of controlled parking on levels of traffic, and therefore air pollution. With data suggesting that the majority of the borough's traffic may not be generated from Hackney itself, we wanted to explore

⁵ www.hackney.gov.uk/media/7004/Hackney-transport-strategy-2015-2025/pdf/Transport-Strategy-2015-25

⁶ www.hackney.gov.uk/media/7009/Liveable-neighbourhoods-plan/pdf/Transport-Strategy-2015-25-LIVEABLE

⁷ The Council's Parking Enforcement Plan gives fuller detail on the different types of controlled parking operating in Hackney - <http://www.hackney.gov.uk/pep>

whether restricting more parking areas to residents could have impacts on pollution levels in the areas concerned and wider areas also.

- 1.24. In addition, and in a similar vein to the exploration around road closure schemes, we aimed to explore decision making processes around parking control schemes, and the items of evidence which are used to inform this.
- 1.25. While focusing mainly on transport, the Commission wanted to touch on two further areas; exploring the extent to which the Council communicates to residents on the issue of air pollution, and around how it ensures that air quality considerations play a key part in processes within the planning system.
- 1.26. On communications, the IPPR during an evidence session used to help shape the focus of our review, said that the engagement of local people on air quality was vital, and that local authorities had a strong role to play in this. They felt that there had been an increase in the awareness of the issue and of the causes but that communication needed to continue. Draft National Institute for Health and Care Excellence (NICE) guidance also recommends Councils to give consideration as to how awareness can be raised among residents, businesses, and at risk groups.⁸ With reductions in pollution likely to be reliant on significant levels of behaviour change – particularly around modes and methods of transport – we were keen to explore how the Council is helping to make the case for this change.
- 1.27. Finally, and in regards to Planning, our review was set in a context where the Council was consulting on a new borough-wide local planⁱ. This plan, known as LP33, will be the key document to direct development in the borough up to 2033.
- 1.28. The plan is being shaped in a context of rapid population growth; up by over 30% since 2001, and predicted to rise to 317,000 people from the current 269,000 by 2033. This brings a need for new homes in an already densely populated area; the equivalent of 1,758 additional units per annum^[1]. It also puts increased pressure on existing and brings the need for more services, facilities and economic opportunities.
- 1.29. We wanted to explore the processes through which the Council ensures that air quality considerations play a full part in individual planning decisions. In a wider context, we also wanted to gauge the Council's readiness to mitigate and reduce any detrimental effects on air quality of the further significant development that is needed in the borough.

⁸ Air pollution: outdoor air quality and health NICE guideline, Draft for consultation, December 2016 - www.nice.org.uk/guidance/GID-PHG92/documents/draft-guideline

^[1] Hackney Local Plan 2033 Direction of Travel document - mginternet.hackney.gov.uk/documents/s50202/CDM-17156409-v1-Appendix_1_LP33_21_6_16_Final.pdf

2. SUMMARY, RECOMMENDATIONS AND OUTCOMES

Summary

Filtered Permeability

- 2.1. The Council has a long track record in the delivery of filtered permeability schemes. 80 road closures are already in place in the borough. Its Transport Strategy sets out an approach of delivering more.
- 2.2. In terms of their impact on air quality, only very recent schemes in Hackney have been the subject of air quality monitoring.
- 2.3. Measuring the impact of schemes on the numbers of vehicles in an area can be used as a valid proxy measure for its effects on pollution levels. However, previous schemes in the borough have also not had traffic monitoring carried out.
- 2.4. This means that we have been unable to measure the air quality impact that schemes have had or to estimate this from data on their impact on traffic levels.
- 2.5. We are supportive of the Council having moved to monitor the impact of its more recent schemes. We are also supportive of the pragmatic approach being taken towards this monitoring. This is in regard to the use of monitoring tubes combined with traffic and cycle counts. Monitoring tubes are open to greater margins of error than other forms and do not give an insight into hour by hour fluctuations in air quality. However they are vastly more affordable than other options and - along with traffic and cycle counts - will offer an indicative insight into impact.
- 2.6. While supportive of the current approaches to monitoring, we make a recommendation that (depending on the size of the scheme) they might sometimes go further. This is with particular relation to expanding the monitoring to have a greater focus on people as well as vehicles. This would better enable the identification of any health benefits⁹ gained from modal shift and - for larger schemes - more nuanced measuring of any impact on visitor numbers to an area¹⁰.

⁹ The Transport & Public Realm Public Health Specialist giving evidence to the Commission said that it was possible to quantify health benefits of each journey which was shifted from a car to another mode. She said this meant that counts of pedestrians and or people walking in an area pre and post the implementation of a scheme be used as a tool to help assess its overall health impact. In a context where air quality monitoring is expensive and open to inaccuracy, we feel that pedestrian counts could be another means through which the impacts of schemes are monitored.

¹⁰ The '*Disappearing traffic? The story so far*' study which we cite a number of times in this report recommends that scheme monitoring includes exploring the impacts that schemes have had on the movement of people overall, and is not focused only on vehicle counts.

- 2.7. This review has not been able to determine the impact of filtered permeability schemes on air quality in Hackney. However, wider evidence shows that as part of a range of measures they can help address transport related air pollution when they are delivered in areas like this one.
- 2.8. With motorised forms of transport the key driver of air pollution, filtered permeability could be shown to help tackle the issue if it had the effect of reducing traffic and or car use in an area, on an overall level.
- 2.9. National and international research suggests that they can. A study¹¹ drawing on (among other items of evidence) 62 case studies of schemes which reallocated roadspace to improve conditions for pedestrians, cyclists, buses or other high-occupancy vehicles, and which had been subject to traffic monitoring, on both the roads which had been treated and the roads surrounding them.
- 2.10. It found that a large majority (82%) of these schemes delivered a percentage reduction in traffic in the overall area. The authors acknowledge that traffic monitoring is open to significant margins of error. However, it deems the shares of schemes having seen reductions and the scale of the reductions themselves, to show the trend to be a real one.
- 2.11. Informed by the 62 case study schemes and wider evidence, the study seeks explanations as to the determinants of whether schemes are likely to deliver traffic reductions.
- 2.12. In short, the study identifies three types of responses by drivers to the introductions of filtered permeability schemes. Which ones of these are present in responses to an individual scheme was found to depend on the extent to which that scheme had reduced space for vehicles (capacity) in the treated area, and the extent to which there is spare capacity in the surrounding area to offset the reductions in capacity in the area treated.
- 2.13. Where schemes had not reduced capacity in the treated space as they may have intended, or where capacity existed in the surrounding areas to offset capacity reductions delivered by a scheme, common responses by drivers were to continue using the treated space or to use the spare capacity in the surrounding area.
- 2.14. However, case studies of schemes which had delivered a real reduction of capacity in the route treated, and which were delivered in areas where there was not adequate additional capacity available elsewhere, showed that there had been a wider range of responses. This did include continuing car use in the treated area or in that surrounding it. However, responses in these cases also included changing modes of travel from the car and others which would reduce traffic levels.

¹¹ Disappearing traffic? The story so far, Cairns, S; Atkins, S; Goodwin, P
<http://discovery.ucl.ac.uk/117869/>

- 2.15. Evidence suggests that the environment in Hackney is one matching the conditions in which schemes are evidenced to reduce traffic.
- 2.16. London is suffering from significant and increasing levels of congestion¹². As an inner city borough, we deem it unlikely that spare capacity is available to offset the capacity reducing impact of schemes delivered here.
- 2.17. In addition, the high shares of car journeys which cover very short distances and the proximity of local services and amenities to people's homes, mean that many journeys are amenable to walking or cycling. The significant improvements delivered to public transport and to cycling and walking infrastructure mean that alternative options are accessible and available.
- 2.18. We note that in a context of rapid population and employment growth, both in Hackney and in surrounding areas, filtered permeability schemes may only help to contain growth in traffic without wider interventions on a London wide and national level. This means that we cannot say definitively that delivering filtered permeability schemes in Hackney will lead to reductions in traffic, and therefore increases in air quality.
- 2.19. However, we reach a view that filtered permeability schemes when delivered in environments like Hackney, can play a part in the response to the issue of air pollution by reducing overall levels of traffic which would be present without them.
- 2.20. We look forward to the Council completing their analysis of the traffic and air quality impact of its recent major schemes. This is likely to be some time away; only after allowing schemes to bed in for a significant period can full insight be gathered on their true impact.
- 2.21. Upon completion of the analysis, we ask that the Council uses this and other evidence (including the findings of this review) to produce a report on the impact of the Cycle Superhighway 1 (CS1) De Beauvoir and Wordsworth Road area schemes, the successes in their delivery, and lessons learnt. We see these as innovative schemes which could help inform approaches in other areas.
- 2.22. We have been persuaded of wider ranging health benefits that schemes to reduce avoidable car use and traffic can deliver. This is with regard to better providing an environment in which adults and children are able to choose healthy options.
- 2.23. Significant shares of the population – 8 out of 10 children in London and 46% of adults in Hackney – are doing less exercise than recommended. 43.5% of Year 6 children in Hackney and 62.9% of adults in England are overweight or obese.

¹² Data drawn from London Assembly Transport Committee report 'London stalling - Reducing traffic congestion in London'

- 2.24. We have been persuaded that by authorities working to better ensure that the healthy travel option is the easiest and most attractive one, they can better enable people to build exercise into their day to day lives.
- 2.25. Reducing car use and car prevalence will also have a virtuous circle affect. It will make the environment safer and freer of noise pollution, intimidation, and difficulty in crossing roads. This will further enable more people of any age or ability to travel and or play actively.
- 2.26. Part of the evidence gathering for this review involved the Commission holding focus group sessions with samples of residents who had been affected by a recent filtered permeability scheme introduced in their area.
- 2.27. Discussions with residents who were supportive of the scheme showed how the benefits mentioned above were being felt directly by some of those living in the area, and the positive impacts on quality of life that these had had.
- 2.28. This review has evidenced the capacity of filtered permeability schemes to help mitigate air pollution issues and to deliver wider health and environmental benefits in addition. However, it has also made clear that schemes are likely to deliver disbenefits.
- 2.29. Our focus group session with residents opposed to a scheme in their area highlighted the significantly detrimental personal impact that these can have and we have real concerns around these.
- 2.30. The principal disbenefit of schemes is the displacement of shares of the traffic previously using roads that have been closed, to surrounding ones remaining open. This is an issue which brings questions around equality; depending on the locations of their homes, some residents will see environmental improvements to their streets, while some will see detrimental effects.
- 2.31. We have reached a view that the extent to which displacement may be legitimately tolerated as a disbenefit of a scheme, is dependent on the characteristics of the roads experiencing the displacement. We have reached a view that schemes delivering a movement of traffic from narrower residential roads to busier main roads, deliver greater levels of benefit than disbenefit.
- 2.32. This is due to main roads having broader road and pavement widths. These characteristics mean that pollutants do not deliver as much harm to pedestrians and people occupying the buildings running along them. Reducing exposure by a few metres can significantly reduce exposure levels and moving traffic away from narrow roads onto main roads is likely to enable this.
- 2.33. Where we have greater concern is around schemes displacing traffic from smaller roads onto other smaller roads.

- 2.34. Our focus group discussion with residents opposed to a scheme in their area highlighted the significantly detrimental impacts that schemes can have in terms of displacement. This very much included narrow residential streets adjacent to some of those closed.
- 2.35. Evidence shows that dispersal issues from schemes are generally likely to reduce as they bed in. This is not to say that we are taking for granted that this will be the case in the schemes recently delivered in Hackney, and we support the work of the Cabinet Member to ensure there is ongoing dialogue with those who have been adversely affected in order for solutions to be found.
- 2.36. However, despite the concerns that we have around disbenefits – and findings summarised further below which suggest points of learning for both TfL and the Council from recent schemes delivered here – we have still reached a view that we are supportive of the use of filtered permeability schemes to help address transport and public health related challenges in the area.
- 2.37. We recommend that the Council continues to use these schemes as part of a range of measures to help reduce avoidable car use and to better facilitate other transport options.
- 2.38. In addition to looking at the impact of filtered permeability schemes, we explored the types of evidence which inform decisions on the design and delivery of them, the weight that these different considerations account for in decisions, and the content of consultation documentation regarding schemes.
- 2.39. We are supportive of how the Council approaches its design and development of schemes. This is in regards to its engagement of a range of interest groups (including those seeking to better facilitate walking, cycling, and accessibility for people with disabilities) in order that they can help mould schemes. We are also supportive of its early liaison with statutory bodies and local Councillors.
- 2.40. We reviewed the engagement and consultation process and are supportive of the approach taken.
- 2.41. This includes intensive consultation of those living within catchment areas of proposed schemes with paper copies of documents being sent to households and (for larger proposals) drop in sessions for residents to speak to officers directly. In recognition that residents living in areas adjacent to schemes and those accessing the area from further afield may also be affected by schemes, the Council also works to make the documents accessible online, and to advertise them in the local press.
- 2.42. The analysis of consultation results generally includes an exploration of support levels among those living in the immediate area of a scheme, in addition to support levels overall. This depth of analysis mitigates the risk of the views of those who are most effected by schemes being masked by high numbers of responses from those living outside.

- 2.43. TfL delivered the consultations for a number of the recent schemes proposed (and then implemented) in Hackney. We did not question TfL directly on the approaches taken but from desk research we have found similar approaches to have been followed to those above. We are again supportive of these.
- 2.44. In addition to the processes of consulting, we explored samples of previous consultation documents themselves. Opinions towards schemes are very divided. We feel that setting out in consultation documents the wider context within which schemes are being considered, the purpose of individual schemes, and the benefits and disbenefits that they are expected to achieve, can be one route towards more clearly sharing with residents our reasoning for them.
- 2.45. We were positive about the contents of the Council consultation documentation which we reviewed. It showed the Council to have set out the reasoning for proposing changes for the area and the wider range of benefits that encouraging cleaner and greener transport could have. It listed a range of benefits.
- 2.46. However we do suggest that this information be expanded on. This is in particular relation to air quality, the need for action to be taken to mitigate the impact of population growth here and elsewhere, and the other related actions that the Council is taking to facilitate options other than car ownership.
- 2.47. Our focus group discussions suggested that even engaged residents are not necessarily aware of the context in which the Council was delivering these initiatives nor the range of initiatives which were being delivered alongside them¹³. We understand that the consultation documentation is being reviewed currently and we make a recommendation with suggestions to feed into this.
- 2.48. We feel that there was room for more significant improvement in the consultation materials produced by TfL for the recent CS1 schemes in Hackney.
- 2.49. Unlike in the Hackney-produced documents that we reviewed, these did not make reference to the wider environment in which schemes were being considered.
- 2.50. We also feel that they would have been stronger if they contained clearer information of any foreseen likely disbenefits of the schemes, in addition to the positive expected impacts. This would give fuller assurance to residents that schemes had been developed in a thorough and well thought out way, and that proposals were only being made after all the likely advantages and disadvantages of a scheme had been weighed against one another.

¹³ Although the consultation for the scheme that our focus group residents were affected by was delivered by TfL, rather than the Council, we still see the lack of information that even a particularly engaged group had demonstrates the need for these consultations to give as greater depth of information as possible.

- 2.51. We make a recommendation that - in the event of similar consultations being delivered by TfL in the borough in future – the Council works with TfL to try to secure improvements to levels of information given in consultation documents.
- 2.52. In terms of the weight given to consultation results, we very much support the Council using these to help decide on whether schemes should go ahead, and to inform any modifications or changes which can help to improve them.
- 2.53. This said, there is evidence to support the Council using these findings as part of a range evidence to inform final decisions, rather than treating them as a set of findings which on their own should establish the way forward.
- 2.54. In three examples shared with us, response rates to consultations on filtered permeability schemes have been between 10 and 16%.
- 2.55. In another case that we reviewed in more detail, a total of 122 responses appear to have been received from the 1522 people living on the roads which would be most affected by a scheme. More than a third of the total number of responses were submitted by an organisation which had organised a campaign regarding the proposals.
- 2.56. This highlights the need to fully consider higher level consultation results and the comments within them. However, not giving other considerations an equal weighting would not be valid.
- 2.57. We agreed with Officers around more needing to be done to address misconceptions in the community generally around consultations acting as referendums.
- 2.58. We support the work to review consultation documentation to make it more clear that results would help inform approaches rather than fully determine them. We ask for an update in this work.
- 2.59. Our review has highlighted the importance of maintaining dialogue and communications after the point of schemes being introduced. We feel that there is learning for the Council from recent schemes in terms of the extent which residents were communicated with after they had gone live.
- 2.60. This is in regards to updating residents on how the effects of schemes are being monitored and any early results of this monitoring, giving guidance on how feedback (in particular during live trials of schemes) can be given and how this will be taken into account, and on any immediate actions that the Council has or will take in response to this.
- 2.61. Monitoring the impacts / key issues of schemes and making this information quickly available will enable debate around the impacts of schemes to be well informed. We make recommendations around dedicated information

webpages being created for any future permeability schemes which are introduced.

- 2.62. We feel that these webpages should also give assurance to residents that the Council is being as responsive as it can be to their concerns. This is through updates being made during periods of live trials, with summaries of responses received, any early action that has been taken in response to these, and explanations where issues can only practically be considered at the end of a trial period.

Parking Controls

- 2.54 As with filtered permeability schemes, the Council has not previously carried out monitoring exploring the impacts of new controlled parking schemes on air pollution levels. We support its move to now do so.

- 2.55 However, indirect evidence suggests a significant impact. Parking levels in streets in Hackney have been shown to have halved upon controls being introduced to them. This reduced parking stress indicates a removal of some of the vehicles (and their emissions) previously accessing the area, and a reduction in the emissions expended by cars continuing to access it but spending less time searching for a space.

- 2.56 Whilst bringing parking controls to areas decreases parking stress levels and the number of vehicles entering them, any nearby areas without controls in place are likely to see disbenefits in mirror form. Traffic displaced from newly controlled areas will be moved to these areas. This will cause increased emissions from the higher numbers of vehicles, and escalations of already high levels of parking stress. We have full sympathy with residents suffering from these issues and we welcome the work of the relevant Cabinet Member in further engaging those living in the few areas of the borough without controls in place.

- 2.57 We have found that the presence of uncontrolled parking in the borough is likely to have detrimental air quality impacts on the wider borough in addition to the uncontrolled areas themselves.

- 2.58 This is through the facilitation of more (often short) journeys by car into and within the borough than would be facilitated if all of the borough was controlled. These journeys will detrimentally affect pollution levels in the uncontrolled parking areas, and on the routes that are used to access them.

- 2.59 We have particular concerns around the issue of commuting into the borough by car, and what we feel to be high shares of these vehicles parking in uncontrolled areas. Members noted what they felt to be a prevalence of this activity and evidence can be used to give an indicative insight into its scale.

- 2.60 Around 17,000 of people who work in the borough travel to work by car. With the majority workers in Hackney living outside the area, it is reasonable to estimate that large shares of the 17,000 travelling by car to work also come from

outside of it¹⁴. We feel it is likely that many of these vehicles currently choose to park in uncontrolled areas. These journeys will cause pollution in both the immediate areas in which they park, both in the areas where parking is taking place and on the roads forming routes to them.

2.61 Where we have perhaps even greater concern is reported instances of drivers from outside the borough using uncontrolled parking areas as 'park and ride' commuting options for their journeys further afield. This takes the form of people parking in these areas before accessing the improved public transport links nearby (for example Clapton station in the north of the borough) to complete the remainder of their journey. This was reported as an issue by the relevant Cabinet Member, the Parking Service, and Members of the Commission also.

2.62 Evidence points to the majority of traffic in the borough originating from outside of it. This highlights the need for change at a London level if levels of traffic and congestion are going to significantly reduced. However, we also feel that the presence of areas of uncontrolled parking which better enable car trips from outside of the borough to end within it, are likely to contribute in a small way to the volumes of traffic (and the air quality issues associated with them) which we see here.

2.63 Parking Controls also enable wider progressive measures to tackle transport related air pollution.

2.64 On parking permits for on street parking, the Council sets an incremental pricing structure according to the emission levels of vehicles. Diesel vehicles incur an additional levy within the scheme. Electric vehicles incur a zero charge. Permit pricing to influence environmentally purchasing decisions would not be possible if parking controls were not in place. We are supportive of emissions-related charging and feel that the same principles should apply to pricing for permits on the Council's estates. We also ask that the Council works to encourage Registered Housing Providers to follow a similar approach.

2.65 For new housing developments, and in order to help mitigate levels of car ownership which growth pressures might otherwise bring, the Council applies Car Free conditions to the majority of applications which it approves. The attachment of car free conditions to approvals for new developments would be meaningless if the delivery of them took place in areas within or very close to, uncontrolled parking areas.

2.66 We also understand that for developments being delivered in uncontrolled parking areas, the Council is generally unable to insist on car free clauses being attached to approvals which could then take affect from any point that a CPZ is introduced¹⁵.

¹⁴ This is also supported by the low levels of car ownership which exist among Hackney residents, and the low shares of our residents who travel to work (whether this is inside or outside of the borough) by car.

¹⁵ <http://mginternet.hackney.gov.uk/mgAi.aspx?ID=27960>

- 2.67 As with filtered permeability schemes, we have been persuaded that controlled parking can deliver benefits beyond improving air quality. This is along the same lines as the benefits of filtered permeability; making the environment more conducive to walking, cycling and physical activity generally for adults and children, and by making driving less convenient than other options.
- 2.68 The Faculty of Public Health in their guidance to local authorities recommends the introduction of more CPZs as one of the ways that local authorities should manage the impact of cars on health¹⁶.
- 2.69 We are in agreement with this, and feel that an evidence base is in place to support the borough becoming an area wholly covered by parking controls¹⁷.
- 2.70 The Council's Parking Enforcement Plan¹⁸ sets out that decisions to implement controlled parking can be made according to six factors. This includes consultation responses, and environmental and air quality impacts of parking and traffic¹⁹.
- 2.71 No formal weighting is applied to these factors in terms of the contribution that each makes to informing final decisions. However, in practice, responses to consultations proposing parking controls for an area appear play a very fundamental role in the decision to go ahead or not with them, with the Council not generally delivering schemes where there is not significant support for them among the roads that were consulted with²⁰.
- 2.72 We feel that the weight which – in practice – is given to responses to consultations on parking controls in making decisions whether to move forward with schemes, should be revisited. Response rates to consultations of 15-20% are the norm. We do not feel that these responses should trump all other evidence.

¹⁶ *Local action to mitigate the health impact of cars*, Hunter and Saunders, UK Faculty of Public Health, July 2016

¹⁷ It is important to note that our support is for separate, zone by zone controlled parking schemes which in their totality cover the full borough. This approach would discourage journeys by car into the borough from outside, without encouraging any increases in car journeys within the area. The Commission would not support a borough wide, single zone scheme.

¹⁸ <https://www.hackney.gov.uk/pep>

¹⁹ In addition to this, the Plan sets out the legal duty of the Council to consider traffic management grounds before public opinion. This might play out by the Council including some roads within a scheme where there was not majority support for it, in order to be able design a final scheme informed by traffic management considerations.

²⁰ A paper to the Commission - <http://mginternet.hackney.gov.uk/documents/s53212/Paper%206%20-%20Parking%20Zone%20Implementation%20process.pdf> confirmed that in no cases have the Council gone ahead with implementing a scheme where there has not been majority support on any of the roads consulted with. The Parking Service in discussions has also confirmed that while some schemes have been delivered where the streets within them have not (on a street by street basis) been supported by a majority, that this is a rare occurrence, and that most schemes have been implemented only after a majority of streets covered within it have expressed support.

- 2.73 With the Parking Enforcement Plan giving a mandate to the Council to implement controlled parking on environmental and air quality grounds, and evidence available demonstrating the pollution impact of retaining uncontrolled areas of parking in the borough (both on the uncontrolled area and borough more widely), we suggest that this factor should be given a weighting that is at least proportionate to that given to consultation results drawn from the immediate area.
- 2.74 We note points made to us around the streets with uncontrolled parking falling in areas with lower pollution levels than elsewhere in the borough and the view that this would make implementation of parking controls on these grounds difficult. We note the view that the relatively higher air quality in these areas means that air quality considerations would be difficult to justify as meeting the 'exceptional circumstances' threshold set out in Recommendation 2.1 of the plan within which schemes may be introduced without majority support.
- 2.75 We challenge this view. The whole of the borough is designated as an Air Quality Management Area. While the uncontrolled areas (like some of the controlled areas nearby which also see lower levels of pollution) benefit from being geographically placed at further points from the city, this in no way points to parking stress and traffic related to it not contributing to the pollution levels which do exist there, nor it not having a detrimental effect on levels in other more polluted areas through the encouragement of car movement through them.
- 2.76 That the uncontrolled streets are in areas with overall lower levels of air pollution is – in our view - despite the lack of controls being in place and not in any way because of it. This, combined with data on the health impacts of air pollution could, we feel, be seen to meet the 'exceptional circumstances' criteria.
- 2.77 We ask that the Council seeks to implement borough wide, zone by zone controlled parking coverage, on the grounds of environmental and air quality considerations.
- 2.78 Whilst feeling an evidence and policy base to be in place for the Council to pursue controlled parking across the borough, we do not discount the importance of consultation. As with responses received from consultations around filtered permeability schemes, findings from parking consultations are used to help lead to improvements to them. We also see them as being a key avenue through which the Council can lay out a range of information to residents.
- 2.79 This is largely already being done and we support this. We only ask that the detail incorporated into the documentation is expanded to include the wider context in which controlled parking is being proposed, and the options aside from car ownership which are available.

Communications with residents on air quality issues

- 2.80 A wide range of evidence and guidance highlights a key role for local authorities in communicating with residents on air pollution.

- 2.81 This is with regards to giving warnings and advice when levels are particularly high, information on the health effects of exposure and how this can be reduced, the causes, and the changes needed to help to address it.
- 2.82 The topic areas that we have covered in this report – around the use of filtered permeability schemes and controlled parking zones – are ones which partly involve encouraging behaviour change by our residents. Very polarised views exist towards them.
- 2.83 We see communications as a vital step towards helping to explain our reasoning for supporting schemes and to help persuade more residents that they are needed. We can also work to make the case for changes delivered on a wider level.
- 2.84 Current communications activities on air quality are limited to general and targeted promotions of airTEXT (a service providing warnings and advice if air pollution in people's areas are expected to reach moderate, high or very high levels), and general promotion of activities, many of which are relevant to the air quality agenda.
- 2.85 We see the need for a wider communications activity dedicated specifically to air pollution. We feel that this could better create an environment which enables residents to make positive choices and to be more informed of the reasoning for the Council's approaches (for example around supporting filtered permeability and controlled parking schemes). This is in addition to better preparing residents for London wide initiatives such as the introduction of the Ultra Low Emissions Zone. We feel that there should be an overarching approach in place, and that this should be defined as one of the actions that the Council is taking to address air pollution issues.

Planning and air pollution considerations made in new developments

- 2.63. Through its adherence to national and regional policy and guidance and the establishment of extensive policy at a local level, the Council operates within a framework enabling air quality considerations to play a significant role in planning decisions. The further-developing London and local planning policy environment may soon enable it to go even further in the standards it demands.
- 2.86 Current arrangements through which the Council ensures that that air quality considerations play a full part in planning decisions involve dialogue between two service areas of the Council. Within this arrangement, the Environment and Waste Strategy Service reviews planning applications from an air quality viewpoint, and gives any advice and recommendations to the Planning Service. This regards whether applications should – on air quality grounds – be accepted or refused, or accepted subject to particular conditions being attached.
- 2.87 From discussions with representatives from both services, we reached a view that there was room for greater collaboration between the two. The services appear to have agreed on there being a need for improvement, and work is now

progressing towards achieving this. We support the work and ask for an update on the impact of it.

National and London level change

2.88 This Council can and does contribute to tackling air quality. However, substantial progress will only be made through action on a national and local level to reduce traffic generally and the use of the most polluting vehicles in particular.

2.89 At the point of this review starting, the London Mayor was consulting on a set of proposals to improve air quality.

2.90 With this consultation now having ended the Mayor has confirmed the introduction of an Emissions Surcharge (also known as the T-Charge). This – from the 23rd October 2017 – will require cars, vans, minibuses and heavy vehicles driving in the current congestion charge zone in Central London (between 7am and 10pm) not meeting minimum emissions standards to pay a £10 daily charge in addition to the Congestion Charge.

2.91 The Mayor has also announced his intention to go ahead with the bringing forward of the Ultra Low Emission Zone (ULEZ) scheme to the 8th April 2019. This will involve the most polluting cars, vans and motorbikes having to pay £12.50 to drive through (residents living within the zone will be exempt until 2022) central London at any time of the day or night, while buses, coaches and HGVs will pay £100. Emissions standards will be strengthened from those set out by the previous Mayor with standards being set on particulate matter emissions for diesel vehicles²¹.

2.92 We are supportive of the action being taken but would like it to go further.

2.93 The consultation involved the seeking of views towards the scheme covering a greater area (extending from Central London up to the North and South Circular roads). However - whilst the Mayor has now set down an intention to consult at later stages on the extension of the zone to nearly all of Greater London for heavy diesel vehicles from 2020, and to the North and South Circular Roads for light vehicles from 2021 - the scheme in April 2019 will see the ULEZ implemented in the current congestion zone and not more widely.

2.94 We are disappointed that the ULEZ will not in the first instance be brought to a wider area than the current congestion zone. We look forward to the release of future consultations on expansions. However, we feel that consultations should go further still and seek views on widening coverage beyond the North and South Circulars for lighter vehicles in addition to heavier ones. We would be supportive of a scheme covering London as a whole.

2.95 Our review was also set in a context where Mayors in a number of European cities had set out to deliver full bans of diesel vehicles by 2025. We appreciate

²¹ <https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-2>. These proposals are now subject to statutory consultation.

the arguments for London following its current approach rather than matching the announcements of these cities.

- 2.96 However, we still call for the setting out of an approach to incrementally phase out the use of diesel vehicles in London. They account for around 40% of both NO_x and PM₁₀ emissions²². Emerging research continues to question the extent to which testing conditions in which emissions standards are measured mask the true emissions which will be expended on the road²³.
- 2.97 As a final note on a London level, we support calls for greater use of road pricing. The Central London Congestion Charge introduced in 2003 is somewhat of a blunt instrument. The charging structure does not take into account the distances travelled within the zone and the extent of usage of the most congested areas at the most congested times.
- 2.98 We see the need for the design of infrastructure to facilitate the new ULEZ arrangements as an opportunity to explore the potential for a road pricing scheme to operate alongside it, as a replacement of the now dated Congestion Charge.
- 2.99 At a national level the action taken to tackle air pollution is strongly lacking. The Hackney-based Client Earth²⁴ has been instrumental in shining a light on this.
- 2.100 On a number of occasions, ClientEarth has brought legal proceedings challenging the government's approach to the discharge of its duties in relation to air quality. Most recently, ClientEarth secured an Order from the Supreme Court requiring that the government publish its draft Air Quality Plan after the recent local elections. It is understood²⁵, that ClientEarth intends to issue legal proceedings challenging the approach taken by the government in its draft Air Quality Plan (which was published on 9 May 2017) and the subsequent consultation.
- 2.101 Initial viewing of these plans suggests that they are vague and non-committal. They do not commit to two practical steps which would enable more tackling of the issue.
- 2.102 We join the call for the funding of a diesel scrappage scheme to facilitate the removal of the most polluting vehicles from the roads without penalising those who bought them in response to government advice and incentives.
- 2.103 We also support the need for vehicle excise duty to be devolved to the London level. This is in order to greater support cleaner transport initiatives in the capital

²² www.ippr.org/publications/lethal-and-illegal-londons-air-pollution-crisis

²³ Research by the [Emissions Analytics](#) found a number of manufacturers to have delivered models in 2016 with NO_x emissions that are far higher than the official lab-based test when driven in real-world conditions.

²⁴ www.clientearth.org

²⁵ <https://www.clientearth.org/clientearth-challenges-uk-governments-air-pollution-consultation/>

and for the extent of differential pricing applied according to vehicle emissions to be partly informed by discussions with local people.

Recommendations

We make 17 recommendations

Recommendation 1 – That the Council uses pedestrian and people focused counting to help inform the impact of filtered permeability and road closure schemes.

We are supportive of the Council carrying out air quality and traffic monitoring (including cyclist counts) to assess the impact of its filtered permeability and road closure schemes.

We also support its use of tools (the Health and Economic Impact Assessment tool for Cycling and Walking and the Healthy Streets Check) to enable a wide range of health and environmental factors to inform findings on the results of schemes.

However, we also ask that the Council draws any learning from the ‘Disappearing traffic? The story so far’ study and from the evidence given to the Commission by Transport & Public Realm Public Health Specialist around the further monitoring in which it might engage. This is in regards to further ensuring that monitoring includes exploring the impacts that schemes have had on people movements generally.

We ask that the Council works to ensure that assessments of any change to pedestrian activity, and the extent of people taking of journeys by foot before and after the changes is used to measure the impact of all schemes.

This would better enable the Council to gauge any health benefits of schemes in terms of any modal shift from the car for journeys taken, and for more nuanced monitoring of the impact of schemes on visitor numbers to an area.

Recommendation 2 – That the Council rolls out a programme of filtered permeability schemes

We have reached a view that filtered permeability schemes should be used as one of the Council’s responses to the transport related challenges around growth.

We are convinced that they are likely to reduce levels of traffic and pollution on an overall level, and to deliver wider ranging health and environmental benefits in addition.

We ask that the Council sets out a programme of future schemes.

Recommendation 3 – That the Council publishes a report on the impact of the CS1 De Beauvoir and Wordsworth Road schemes

We look forward to the Council completing their final analysis of the traffic and air quality impact of its recent major schemes.

Upon completion of the analysis, we ask that the Council uses this and other

evidence (including the findings of this review) to produce a report on the impact of the CS1 De Beauvoir and Wordsworth Road schemes, the successes in their delivery, and lessons learnt.

We see these as innovative schemes which could help inform approaches in other areas.

Recommendation 4 – greater context being given in consultation documents for filtered permeability or road closure scheme proposals.

The content of the supporting documents for the London Fields area traffic management options consultation from January 2016 evidences that for some time the Council has laid out the reasoning for proposed schemes and the wider benefits that they are expected to deliver.

This has included notes around improvements to air quality, road safety, personal mobility that delivering reductions in car use will achieve, and the issues from growth in Hackney and London generally which schemes will help to manage.

However, we ask that the information offered (at least for larger schemes) is more detailed.

We ask that the information sets out:

- That schemes as per the ones proposed have been evidenced to help reduce traffic and avoidable car use in areas similar to Hackney.
- That road transport is shown to be the key current cause of air pollution in Hackney (backed up by a statistical example such as one submitted to the Commission showing the high shares of pollution that road transport accounts for).
- In a clear way the challenge that the borough is facing in terms of managing growth. Using statistics around recent and expected population growth in Hackney and London to highlight this.
- How these schemes are one of the ways that the Council is trying to facilitate travel clean and green travel through the borough in a context of growth in surrounding areas.
- That these schemes are one of a range of measures being taken to enable residents to travel differently.
- Any expected disbenefits of schemes (greater traffic levels on sections of main roads for example) and explanations as to why the benefits are felt to outweigh these

Recommendation 5 – For the Council to work with TfL to seek improved levels of information being given in the consultation documentation they deliver.

We feel that there is learning for TfL from recent consultations delivered for CS1

related schemes proposed for areas in Hackney.

The two consultation documents that TfL produced for the schemes in the Wordsworth Road²⁶ De Beauvoir Road²⁷ areas, contained a range of useful information.

However, unlike in the documentation for the Hackney-led consultation, there was not reference to the wider environment in which schemes were being considered.

The challenge of managing growth in Hackney and London generally was not mentioned. Whilst a reduction in motor traffic was stated as the aim of the scheme, the impact of traffic on air quality was not given.

This - in tandem with the finding from our focus group that residents living in one of these areas were not aware of the wider challenges that schemes were aiming to address – again leaves us with a view that consultation documents should set this out.

We also feel that clearly setting out the foreseen disbenefits of schemes in addition to the expected benefits would give fuller assurance to residents that schemes had been developed in a thorough and well thought out way.

In the event of similar consultations being delivered by TfL in future, we ask that the Council works with TfL to try to secure improvements to levels of information given in consultation documents.

We ask that the Council seeks for TfL led consultations for schemes in Hackney set out:

- That schemes as per the ones proposed have been evidenced to help reduce traffic and avoidable car use in areas similar to Hackney.
- That road transport is shown to be the key current cause of air pollution in Hackney (backed up by a statistical example such as one submitted to the Commission showing the high shares of pollution that road transport accounts for).
- In a clear way the challenge that the borough is facing in terms of managing growth. Using statistics around recent and expected population growth in Hackney and London to highlight this.
- How these schemes are one of the ways that the Council is trying to facilitate travel clean and green travel through the borough in a context of growth in surrounding areas.
- That these schemes are one of a range of measures being taken to enable residents to travel differently.

²⁶ https://consultations.tfl.gov.uk/cycling/cs1-wordsworth-road/user_uploads/cs1-wordsworth-consultation-report-final.pdf

²⁷ https://consultations.tfl.gov.uk/cycling/cs1-de-beauvoir/user_uploads/cs1-de-beauvoir-consultation-report.pdf

- Any expected disbenefits of schemes (greater traffic levels on sections of main roads for example) and explanations as to why the benefits are felt to outweigh these

Recommendation 6 – The Council to report back to the Commission on the results of the review of consultation documentation, and the making more clear that the results will be considered along with a range of other evidence.

We heard from the Council that whilst consultation responses were analysed and the findings used to help shape and inform final decisions, that they were not treated as referendums. This means that the Council's decision to go ahead or not was not fully dependent on whether a majority supported proposals or not.

We support the Council in using consultation findings as part of the evidence to inform final decisions. We agree that the findings (while being very useful) should not be used in isolation to establish the way forward.

Recent consultations on schemes have drawn response rates of between 10% and 16%²⁸. This gives further credibility to these not acting as the trump card in decision making.

We support the use of a range of evidence – the input of interest groups, the views of statutory agencies and relevant services, along with the findings of the consultation analysis – to help design, shape and make a final decision on schemes.

We thank Officers for their acknowledgement that they needed to do more to ensure that consultation materials were clear in explaining that results would be considered along with a wider range of evidence, and that majority opposition would not necessarily lead to the abandonment of a scheme.

We were advised that documentation was being reviewed to make it clear that results to consultations would form part and not the only item of evidence on reaching final decision.

We support this work. We ask for an update on its completion.

Recommendation 7 – that information webpages are available for new filtered permeability and road closure schemes.

We ask that for any future permeability schemes the Council creates webpages detailing the monitoring taking place to assess the impact of a scheme, how (if applicable) residents can feed back their experiences and suggested improvements for consideration, and how these will be taken into account.

Upon the monitoring being completed, we ask that this data is made available on the webpage at the earliest possible point.

Recommendation 8 – that information webpages for schemes give updates on

²⁸ Based on response rates shared with the Commission on three Hackney-led schemes

feedback received, and the Council's response to this.

We ask that the information webpages created as part of recommendation 5, are updated during any live trial of schemes.

We ask that these updates summarise the views and concerns received, and the response of the Council to these. Where it is not practical for the Council to take immediate action on the basis of the view or concern, we ask that explanations are given to this. We appreciate that there is unlikely to be capacity for updates to be made upon any new comment or view being received. However, we suggest that updates are added for each month that a live trial is in place.

Recommendation 9 – that the Council introduces environmental pricing to estate parking permits

The Commission is supportive of the Council using emissions-related charging for on street parking permits. We feel that this is a welcome initiative to help tackle air pollution.

However, we also note that permits for parking on the Council's housing estates are charged at a standard rate, and do not take vehicle emissions levels into consideration.

We ask that the Council applies emissions-related charging to its estate parking permits. We also ask that it encourages Registered Providers operating in Hackney to do the same.

Recommendation 10 - That the Council seeks to implement borough wide, zone by zone controlled parking coverage, taking account of air quality, environmental and other pertinent considerations

That the Council reassesses its view that air quality considerations may not meet the 'exceptional circumstances' threshold set out in Recommendation 2.1 of the Parking Enforcement Plan, within which controlled parking schemes may be introduced without a majority being in favour.

That the Council seeks to implement borough wide, zone by zone controlled parking coverage, taking account of air quality, environmental and other pertinent considerations.

That it does so in light of evidence showing the beneficial impacts on air pollution environmental and other pertinent factors which controlled parking can help deliver.

Recommendation 11 - greater context being given in consultation documents for controlled parking proposals

Information documented in recent parking consultation documents show that the Council gives a range of useful and insightful information. We ask that this is built on to also include:

- That road transport is shown to be the key current cause of air pollution in Hackney (backed up by a statistical example such as one submitted to the Commission showing the high shares of pollution that road transport accounts for).
- The challenge that the borough is facing in terms of managing growth. Using statistics around recent and expected population growth in Hackney and London to highlight this.
- How these schemes are one of the ways that the Council is trying to facilitate clean and green travel to and through the borough in a context of growth in surrounding areas.
- Details of the options that are open to people wishing to continue driving in way which does not require a permit (in particular information on car club options), and details of other non-car travel options (cycle loan scheme).

Recommendation 12 – That the Council develops and maintains an Air Quality Communications Plan and includes this as a dedicated action within the Council’s Air Quality Action Plan.

We ask that Public Health in conjunction with the Communications and Consultation service leads on developing a plan to increase public awareness of air pollution.

This is with regard to the high levels of air pollution, the harm that it does, its causes, the actions that the Council is taking to respond to it and how these will help, and how residents and businesses can contribute towards achieving better air quality.

We ask that this action is named in the Council’s Air Quality Action Plan as one of the measures being taken to address pollution in the borough.

Recommendation 13 – That the Commission receives an update from the Environment and Waste Strategy and Planning Services on their work to improve joint arrangements ensuring air quality considerations play a full part in planning decisions, and its impact.

Current arrangements through which the Council ensures that that air quality considerations play a full part in planning decisions involve dialogue between two service areas of the Council. Within this, the Environment and Waste Strategy Service reviews planning applications from an air quality objective. Advice and recommendations are then given as to whether applications should – on air quality grounds – be accepted or refused, or accepted subject to particular conditions being attached.

From discussions with representatives from both services, we reached a view that there was room for greater collaboration between the two. This would better ensure that the advice provided around air quality related conditions which should be applied to applications is ambitious but also securable. It would also better enable challenge to the Planning Service in any cases where recommendations and advice have not been reflected in determinations.

The services appear agree on there being a need for improvement and as a result of our review have instigated joint work to improve the effectiveness and efficiency of how air quality matters are secured within planning applications.

We support this work, although we are keen to explore its impact.

We ask that an update is given to the Commission on the progress made.

Recommendation 14 – That the Council lobby the Mayor of London for the ULEZ to cover all of London for both heavy and light vehicles.

Recommendation 15 – That the Council lobby the Mayor of London for establishing an incremental approach to ban diesel vehicles in London.

Recommendation 16 – That the Council lobbies the Mayor of London for establishing a road pricing scheme as a replacement for the current Central London Congestion Charge

Recommendation 17 – That the Council lobbies Central Government to introduce a diesel scrappage scheme and to devolve excise duty for London to the GLA.

3. FINANCIAL COMMENTS

- 3.1. The review makes seventeen recommendations that have a direct impact primarily on services within Neighbourhoods and Housing Directorate. Some of these recommendations have no direct financial implications, however some will have a resource impact. Officers involved in the services within the scope of the review are aware of the recommendations of this report and are assessing the potential resource and financial implications.
- 3.2. The Council continues to face significant financial challenges and budget reductions are expected to continue over the medium term. Recommendations will need to be progressed within existing budgetary constraints, with full consideration of future potential budgetary reductions. Any specific proposals/service changes that are generated as a result of this report which have direct financial implications will need to be considered separately, as necessary.

4. LEGAL COMMENTS

- 4.1. Recommendations 2 and 10 provide that the Council consider taking forward Filtered Permeability programmes and additional Controlled Parking Zones. If the Recommendations are approved by the Commission and subsequently adopted by Cabinet, officers will be authorised to investigate the feasibility, consult and implement those proposals provided that doing so is lawful taking

into account compliance with the statutory framework, the results of such consultations, the public sector equality duty contained in section 149 of the Equality Act 2010 and the outcome of any Inquiries that might be required to be held.

- 4.2. Implementation of Recommendations 2 and 10 would entail the making of one or more Traffic Management Orders, which could restrict access to some roads by vehicular or other types of traffic as well as on-street parking. The framework for the making of such orders is regulated by the Road Traffic Regulation Act 1984, sections 6, 122, Schedules 1 and 9 as well as by Part II of the Road Traffic Act 1991. The procedures to be followed are contained in Regulations made under those Acts.
- 4.3. Traffic Management Orders can be made for any of the purposes set out in sections 1(1)(a to g), 6 and Schedule 1 of the 1984 Act, which includes public safety, environmental and air quality considerations amongst other matters.
- 4.4. The legislative framework sets out details as to the considerations and duties that a Traffic Authority must take into account when making such orders, which includes –
 - the desirability of securing and maintaining reasonable access to premises;
 - the effect on the amenities of any locality affected and the importance of regulating and restricting the use of roads by heavy commercial vehicles so as to preserve or improve the amenities of the areas through which the roads run;
 - the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
 - any other matter appearing to the local authority to be relevant.
- 4.5. In considering implementation of Filtered Permeability and or Controlled Parking Zones, the Council may also have regard to the provisions of its Parking Enforcement Plan, Transport Strategy and any other relevant considerations.

5. FINDINGS

5.1. Filtered Permeability and Road Closures

[Recent filtered permeability schemes and an intention by the Council to do more](#)

- 5.1.1 Our review was being carried out at the same time that the Council (with Transport for London) was live trialling two significant filtered permeability schemes in the borough – in the De Beauvoir and Wordsworth Road areas. As a group made up of local Councillors the Commission was aware that these

schemes were the subject of contrasting views from the local community as to whether they were beneficial to the area.

- 5.1.2 We also noted that the Council's Transport Strategy²⁹ sets out filtered permeability as a vehicular restraint tool which it will use as one of the measures to help mitigate the road-related impacts that population and employment growth in this area and others will have³⁰.
- 5.1.3 As well as aiming to reduce traffic in an area, the use of filtered permeability schemes is meant to help progress other planned responses that the Transport Strategy sets out – making improvements to the walking environment, delivering new cycle routes, reallocating road space to pedestrians, cyclists and bus users, and enabling modal shifts to these forms.
- 5.1.4 For example, the De Beauvoir and Wordsworth Road schemes were developed with Transport for London as part of a programme with aims to double the amount of people cycling over the next ten years.

Already a wide range of schemes already in place.

- 5.1.5 As well as being committed to using schemes to help manage current and future pressures, it is important to note that the Council has a long track record in the delivery of schemes.
- 5.1.6 There are currently 80 road closures established in the borough. Figure 2 below was produced for the benefit of the Commission and marks out the spread of schemes already in place³¹.

Figure 2 – spread of road closure schemes in Hackney at January 2017.

²⁹ www.hackney.gov.uk/media/7004/Hackney-transport-strategy-2015-2025/pdf/Transport-Strategy-2015-25

³¹ Map tabled at the Commission meeting 9th January 2017. At the time of production 79 road closures were in place. <http://mginternet.hackney.gov.uk/documents/s53239/Minutes%20Appendix%201D%20-%20Map%20of%20road%20closure%20schemes%20in%20the%20borough.pdf>



Capacity to improve air quality – limited data on a Hackney level

5.1.7 We have found that data on the direct impact of local filter permeability schemes on air quality is limited. This is despite the large range of schemes that have been delivered in Hackney.

5.1.8 Most existing schemes have not had air quality monitoring carried out gauging pollution levels before and after the implementation of changes, neither in the roads which have had filtered permeability applied to them or in the roads surrounding them³².

³² The impacts of a scheme which moved bus traffic from the Narrow Way (following on from previous moves to remove general traffic) onto Amhurst Road was measured in terms of air quality, and unsurprisingly showed decreases in nitrogen dioxide concentrations in the road closed to buses and increased concentrations in the road upon which they were diverted. However, this is the only scheme that we are aware of in Hackney which has had air quality impact analysis completed.

- 5.1.9 An alternative to measuring pollution levels pre and post a scheme would be to gauge the impact on traffic flows of schemes. Motorised vehicles are the largest contributor to air pollution in Hackney (as elsewhere in London). Therefore, evidence on any extent to which a scheme had reduced vehicle traffic could be used to indicatively show its impact on air pollution.
- 5.1.10 However, while the Council has carried out pre and post traffic flow analysis for the larger traffic management schemes it (and TfL) has implemented, it has not done so for the types of filtered permeability schemes this review gives consideration to.
- 5.1.11 The Commission notes that for its more recent schemes – in particular those in the De Beauvoir and Wordsworth Road areas and in Middleton Road – the Council is engaging in air quality and traffic impact analysis. This is being carried out on the streets which have had permeability applied to them and those surrounding them.
- 5.1.12 We understand that the traffic analysis will include an assessment of the impact schemes have had on levels of cycling in the area³³.
- 5.1.13 Due to these schemes being in their infancy however, and with the need for them to have bedded in before final impacts can be gauged, information on the results of schemes were not available to the Commission at the point of its review.
- 5.1.14 This considered, we are unable to consider any data gauging the direct impact of local filtered permeability schemes on air pollution levels or traffic flows.
- 5.1.15 We support the Council now producing an evidence base around the impact of schemes.
- 5.1.16 Later in this report we cite externally produced advice for local authorities and other bodies introducing such schemes (*Disappearing traffic? The story so far*) on the need to monitor and make available information around their impact to ensure that debate following their introduction can be fully informed. We support the Council moving towards a position in which it will be able to do this.

Prohibitive costs of high-accuracy air quality monitoring

- 5.1.17 Whilst supporting the air quality monitoring underway, we have gained an appreciation that the data produced is likely to be indicative rather than fully accurate.
- 5.1.18 Equipment to very accurately measure air quality is expensive. An air monitoring station at Old Street which the Council part funds involves total costs of £15,000 per year, including maintenance of the station and

³³ See records of oral evidence given to the Commission in the meeting of the 9th January 2017 - <http://mginternet.hackney.gov.uk/mgAi.aspx?ID=27498> – para 4.44

management and ratification of the data produced³⁴. In early 2017 the Council procured for use a mobile monitoring device which delivers a high level of accuracy. This brings a £5,000 - £10,000 annual cost³⁵.

5.1.19 As an alternative to these more expensive options, the Council is monitoring the air quality impact of new schemes through the use of nitrogen dioxide tubes and Air Quality Mesh monitors. These bring significantly less cost than the options mentioned above. However, whilst these have the capacity to identify general trends in air quality, they bring a wide margin of error – at around 20%³⁶.

5.1.20 We are supportive of the Council using this methodology along with traffic monitoring to reach an indicative view on schemes, and would not recommend that the Council follows significantly more expensive alternatives.

5.1.21 However, we feel that the current arrangements around monitoring might sometimes (depending on the size of the scheme) go further. This is with particular relation to expanding the monitoring to have a greater focus on people as well as vehicles.

5.1.22 The '*Disappearing traffic? The story so far*' study which we cite a number of times in this report recommends that scheme monitoring includes exploring the impacts that schemes have had on the movement of people overall, and is not focused only on vehicle counts.

5.1.23 The study found that without doing this, schemes can sometimes appear to have delivered negative results when this is not the case.

5.1.24 It cites a set of measures within Oxford which led to a 20% reduction in traffic entering the centre of the area. This could have led to disbenefits being associated with the scheme around a reduction in visitor numbers.

5.1.25 However, due to the monitoring having included counts of the number of people travelling by bus to the area pre and post the changes, the assessment produced evidence that the overall numbers of people visiting the centre had actually increased after the changes had been introduced. We feel that there could be lessons for the Council here around any future monitoring of more

³⁴ See records of oral evidence given to the Commission in the meeting of the 9th January 2017 - <http://mginternet.hackney.gov.uk/mgAi.aspx?ID=27498> – bullet points under 4.11 and para 5.49

³⁵ Drawn from table on pages 14-15 of paper submitted to the Commission - http://mginternet.hackney.gov.uk/documents/s52672/CDM-17883543-v1-AQ_Scrutiny_-_Road_Closure-Filtering_V3.pdf
<http://mginternet.hackney.gov.uk/documents/g3751/Public%20reports%20pack%2009th-Jan-2017%2019.00%20Living%20in%20Hackney%20Scrutiny%20Commission.pdf?T=10>

³⁶ Drawn from information on two separate papers. Margin of error for tubes -pages 14-15 of paper submitted to the Commission - http://mginternet.hackney.gov.uk/documents/s52672/CDM-17883543-v1-AQ_Scrutiny_-_Road_Closure-Filtering_V3.pdf Comparable accuracy of Air Quality mesh Monitors – page 14 of paper submitted to the Commission - <http://mginternet.hackney.gov.uk/documents/g3749/Public%20reports%20pack%2017th-Nov-2016%2019.00%20Living%20in%20Hackney%20Scrutiny%20Commission.pdf?T=10>

significant schemes in the town centre areas; in particular the planned removal of the Stoke Newington gyratory.

5.1.26 In addition, we feel that the monitoring of schemes could benefit from including assessments of any change to pedestrian activity, and the extent of people taking of journeys by foot before and after the changes³⁷.

5.1.27 This would better enable the Council to gauge any health benefits³⁸ of schemes in terms of any modal shift from the car for journeys taken, and for more nuanced monitoring of the impact of schemes on visitor numbers to an area.

Recommendation 1 – That the Council uses pedestrian and people focused counting to help inform the impact of filtered permeability and road closure schemes.

We are supportive of the Council carrying out air quality and traffic monitoring (including cyclist counts) to assess the impact of its filtered permeability and road closure schemes.

We also support its use of tools (the Health and Economic Impact Assessment tool for Cycling and Walking and the Healthy Streets Check) to enable a wide range of health and environmental factors to inform findings on the results of schemes.

However, we also ask that the Council draws any learning from the ‘Disappearing traffic? The story so far’ study and from the evidence given to the Commission by Transport & Public Realm Public Health Specialist around the further monitoring in which it might engage. This is in regards to further ensuring that monitoring includes exploring the impacts that schemes have had on people movements generally.

We ask that the Council works to ensure that assessments of any change to pedestrian activity, and the extent of people taking of journeys by foot before and after the changes is used to measure the impact of all schemes.

This would better enable the Council to gauge any health benefits³⁹ of schemes in terms of any modal shift from the car for journeys taken, and for more nuanced monitoring of the impact of schemes on visitor numbers to an area.

³⁷ In response to questions Council Officers confirmed that pedestrian counts did not currently form part of the assessment of schemes.

³⁸ The Transport & Public Realm Public Health Specialist giving evidence to the Commission said that it was possible to quantify health benefits of each journey which was shifted from a car to another mode. She said this meant that counts of pedestrians and or people walking in an area pre and post the implementation of a scheme be used as a tool to help assess its overall health impact. In a context where air quality monitoring is expensive and open to inaccuracy, we feel that pedestrian counts could be another means through which the impacts of schemes are monitored.

³⁹ The Transport & Public Realm Public Health Specialist giving evidence to the Commission said that it was possible to quantify health benefits of each journey which was shifted from a car to another mode. She said this meant that counts of pedestrians and or people walking in an area pre and post the implementation of a scheme be used as a tool to help assess its overall health impact. In a context

The capacity for filtered permeability to improve air quality – wider evidence

5.1.28 As set out above this review has not been able to determine the impact of filtered permeability schemes on air quality in Hackney.

5.1.29 However, a wider range of evidence suggests that filtered permeability as part of a range of measures can help address transport related air pollution in areas with the characteristics of this borough.

Capacity to reduce traffic

5.1.30 With motorised forms of transport the key driver of air pollution, filtered permeability could be shown to help tackle the issue if it had the effect of reducing traffic and or car use in an area, on an overall level.

5.1.31 National and international research suggests that they can. A 2002 paper (*Disappearing traffic? The story so far*, Cairns, S; Atkins, S; Goodwin, P)⁴⁰ drew on 72 case studies of schemes which reallocated roadspace to improve conditions for pedestrians, cyclists, buses or other high-occupancy vehicles, and a collation of opinions from over 200 transport professionals worldwide.

5.1.32 The paper cites 62 of the case studies where traffic levels were monitored on the road on which space had been reallocated, and on surrounding roads, both before the introduction of the scheme and afterwards.

5.1.33 Taking into account changes to vehicle flows on the routes/area which had been treated, and those on parallel or alternative routes the study found 51 (82%) of these schemes to have delivered a percentage reduction in traffic in the overall area. 11 (12%) showed that there had been a traffic increase.

5.1.34 The study acknowledges that for many of the studies with this data available, the results are open to margins of error / levels of unreliability. For example, even monitoring done over long periods might not always make up for the fact that there is always a natural variability to traffic levels.

5.1.35 However, the study also states that – in light of the high quality of the monitoring delivered in most of the cases, the very high share of them which saw overall reductions in traffic, and the scale of the changes seen - that the overall findings are very unlikely to be down to statistical anomalies.

5.1.36 Taking all of the schemes cited, the average finding was a traffic reduction of 21.9%. The median figure – which given the variability of the results across schemes was seen as the more insightful measure to use – showed that in more than half of the case studies, at least 11% of the vehicles previously using the treated area could not be found in the treated or surrounding area after the roadspace had been reduced.

where air quality monitoring is expensive and open to inaccuracy, we feel that pedestrian counts could be another means through which the impacts of schemes are monitored.

⁴⁰ <http://discovery.ucl.ac.uk/117869/>

5.1.37 This leads them to the finding that ‘traffic reduction is a real phenomenon that occurs when roadspace for cars is reduced’.

Environments / circumstances in which schemes can have a traffic – reducing affect

5.1.38 The ‘Disappearing traffic? The story so far’ study seeks to reach an understanding of how – perhaps against general expectations – decreasing roadspace for motorised vehicles can lead to reductions in traffic.

5.1.39 The authors suggest that there is a general assumption that roadspace reallocation schemes will not prompt people from using their cars and that they will always seek another way around and or wait longer in traffic if necessary.

5.1.40 However, it finds that behavioural responses to these changes are more complex. It identifies a three-level model of behaviour. Which ones of these are triggered depends on the scheme, the extent to which it actually delivers reduced capacity in the affected area, and the extent to which there is spare capacity in the wider area.

5.1.41 Firstly, it finds schemes in which drivers have in general continued to drive but have adapted their behaviour to ‘overcome’ the changes which roadspace reallocations have delivered. It cites an example of a scheme which introduced less green times to traffic lights in a city centre but was found to have seen more cars getting through the lights – presumably because of changes in behaviour around drivers accelerating quickly through lights when they were given opportunity.

5.1.42 Secondly, it identifies schemes which have delivered real capacity reduction in a treated area but which have generally not prevented driving in the wider area. In these cases, driving in the wider area was not reduced due to there being adequate spare capacity on other routes and or drivers finding that this spare capacity existed for them if they retimed their journey.

5.1.43 Schemes which were found to have led to a wider range of responses were those which had delivered a real reduction of capacity in the route treated, and where there was not adequate additional capacity available elsewhere.

5.1.44 There were responses to these schemes of rerouting or retiming trips by car. However – there were a wider range of responses also. This included changing their modes of travel and other actions which would reduce car use.

Environments and Circumstances in Hackney

5.1.45 The evidence cited above suggests that when delivered in particular environments, filtered permeability schemes have the potential to reduce traffic and car use (and therefore air pollution).

5.1.46 The environments where there is the potential for schemes to have this affect are those where there is not spare capacity elsewhere to mitigate the impacts of the schemes, and where other viable transport options are available.

5.1.47 Evidence suggests that this environment is present in Hackney.

5.1.48 This is with regards to congestion levels meaning that alternative capacity is limited, the high shares of car journeys which would be amenable to other forms of travel, and the range of alternatives to the car which are available.

5.1.49 **Traffic Congestion** - Levels of traffic congestion in London suggest that little spare capacity exists to offset the impact of schemes. Data shows the significant levels of congestion in London to be getting worse. Minutes lost to traffic delays are increasing⁴¹. Journey times are less reliable⁴². Inner London boroughs like Hackney suffer from greater delays than areas in Outer London.

5.1.50 **Nature of car use** – Evidence suggests that the types of journeys that are taken by car in London would, in many cases, be conducive to other forms of travel. More than a third of car trips could be walked in under 25 minutes. Two thirds of car trips could be cycled in under 19 minutes. The majority of car trips by car in the capital involved distances of 5 kilometres or less⁴³. Local service and amenities in London unlike in many other areas are generally within walking distance from people's homes.

5.1.51 **Alternative options** – Recent years have seen significant improvements to **public transport** in the borough.

5.1.52 On rail, this has included four new London Overground stations, the completion of the full orbital Overground East London route, and an upgrade of the North London line with refurbished stations and improved comfort, reliability and capacity thorough the delivery of new rolling stock.

5.1.53 On buses, improvements have been delivered through increased frequencies, and the extensions of some routes⁴⁴.

⁴¹ Data drawn from London Assembly Transport Committee report 'London stalling Reducing traffic congestion in London', sourced from Total vehicle delay for London 2014-15, Transport for London, 2016

⁴² Data drawn from London Assembly Transport Committee report 'London stalling Reducing traffic congestion in London', *TfL's quarterly finance, investment and operational performance reports: Quarter 4, 2015/16*, Transport for London, 2016; *Operational and Financial Performance Report: Fourth Quarter, 2012/13*, Transport for London, 2013

⁴³ Drawn from oral evidence given to the Commission by Lucy Saunders, Public Health Specialist – Transport & Public Realm, TfL and GLA

⁴⁴ Points 5.1.48 and 5.1.49 both drawn from the Hackney Transport Strategy, 2015-2025, Public Transport Plan. Regarding point 5.1.49, it should be noted that the Strategy acknowledges that while there have been general improvements to the bus network, that there have been frequency reductions in some cases. Bus provision was also covered within a Commission question time session with the relevant Cabinet Member in April 2017. This included acknowledgements that some bus services were being reduced, and that journey times were increasing. However the overall view of the Commission is that there has been a general significant improvement in bus services in recent years.

5.1.54 On active forms of travel, the Council has been very active for some time in the delivery and facilitation of a wide range of schemes to improve **cycling conditions and cycling infrastructure** in the borough.

5.1.55 Filtered permeability techniques have already played a part in the delivery of improved **cycling conditions**; for example at Goldsmiths Row. Other examples are the delivery of shared paths, dedicated routes (for example three Olympic Greenway Routes), and cycle contraflows enabling bicycles to move in both directions on one way roads for traffic.

5.1.56 **Cycling infrastructure** improvements delivered include significant increases in cycle parking availability in residential streets and at new housing developments, town centres and transport hubs, the delivery of cycle training, the establishment of a cycle loan scheme and working with TfL to install Santander cycle docking stations.

5.1.57 The vast majority of trips taken by Hackney residents are made by foot and the Council has worked to make the environment further conducive to **walking**. Improvements to parks to better facilitate quiet travel, pedestrian crossings, street cleanliness and the public realm generally have all had a role in this.

Capacity for filtered permeability to help tackle air pollution in Hackney

5.1.58 The evidence detailed above suggests that filtered permeability schemes when delivered in environments like Hackney, can play a part in the response to the issue of air pollution.

5.1.59 This is in regards to a reduction (or at least helping the containing of an increase in) in traffic in the immediate and surrounding areas which schemes delivered in already congested areas can deliver.

5.1.60 With a high share of journeys in London covering short distances, and with a number of other, less polluting options being available, we have reached a view that filtered permeability can - when designed in the right way – reduce (or contain increases in) traffic.

5.1.61 This said, our review is being delivered in an environment of rapid population and employment growth, both in Hackney and in surrounding areas. This means that in reality and without wider interventions on a London wide and national level, filtered permeability measures may only help to contain growth in traffic and the air pollution associated with it.

5.1.62 The number of people living in Hackney has increased by over 30% since 2001. Levels are predicted to rise by a further 18% by 2033 to stand at 317,000⁴⁵. For London, projections suggest growth from 8.54 million people in 2014 to between 10.5 and 10.9 million by 2041, a rise of up to 28%.

⁴⁵ Hackney Local Plan 2033 Direction of Travel document - mginternet.hackney.gov.uk/documents/s50202/CDM-17156409-v1-Appendix_1_LP33_21_6_16_Final.pdf

Significant and employment growth is also expected in the North and East sub-regions and in the South East.

5.1.63 An explicit risk of this growth is that increasing numbers of people will need to travel through Hackney to reach opportunities relating to this growth. With road transport the key cause of air pollution in the borough we feel that wider action will be needed to help ensure that the extra movement associated with these changes have as minimal an impact on pollution levels as possible. We can only suppose that without this wider action congestion of polluting vehicles will increase.

5.1.64 This considered, we cannot say definitively that filtered permeability schemes in Hackney will help to lead to reductions in traffic, and therefore increases in air quality.

5.1.65 However, we can say that we see them having a role in helping to reduce the overall shares of people using cars unnecessarily by making other travel options more attractive. We feel that schemes can help persuade people to change their current habits and to encourage those new to the area to use alternatives from the start.

Wider benefits of permeability in relation health and environment

5.1.66 Whilst aiming to explore filtered permeability in the context of its potential to help tackle air pollution and its impact on health, this review has heard evidence of how schemes can help deliver other, wider ranging, health benefits.

5.1.67 This is with regard to better providing an environment in which adults and children are able to choose healthy options.

5.1.68 We heard that along with smoking and drinking too much alcohol, energy dense diets in conjunction with doing too little physical activity are the greatest causes of poor health⁴⁶. This has helped lead to guidelines being released around the amounts of physical activity that people from different age groups should do⁴⁷.

5.1.69 Significant shares of the population in Hackney are not completing this exercise. 46% of adults are doing less than that recommended (2 and a half hours of moderate intensity exercise such as cycling or walking). 29% are deemed inactive, doing less than 30 minutes of this per week. This data is coupled with data for England showing 62.9% of adults were overweight or obese in 2015⁴⁸.

5.1.70 For children and young people the data is even more concerning. On a London level, 8 in 10 are not getting the minimum amount of physical activity

⁴⁶ Drawn from oral evidence given to the Commission by Lucy Saunders, Public Health Specialist – Transport & Public Realm, TfL and GLA

⁴⁷ City and Hackney health and wellbeing profile, Lifestyle and Behaviour, Section 1

⁴⁸ https://www.noo.org.uk/NOO_about_obesity/adult_obesity/UK_prevalence_and_trends

recommended⁴⁹. In 2015/16 24.6% of children in Reception school age in Hackney and the City were overweight or obese. This stood at 42.5% for pupils in Year 6⁵⁰.

5.1.71 We heard that by authorities working to better ensure that the healthy travel option was the easiest and most attractive one, the health benefits of the exercise associated with this could be achieved⁵¹. This could help achieve a 'healthy weight environment' in which walking, cycling and public transport use is prioritised⁵².

5.1.72 Reducing car use and car prevalence would make environments safer and more attractive, and better enabling of anyone of any age or ability to travel actively. This would better enable people to incorporate recommended levels of physical activity into everyday life (which Chief Medical Officers of the United Kingdom have stipulated as being the easiest and most acceptable form of physical activity for most people)⁵³. People in the public realm would be less likely to experience noise pollution, intimidation, and difficulty in crossing roads. The ability for children, disabled and infirm people to travel independently would be increased⁵⁴.

5.1.73 Regarding children specifically, avoidable car use was helping to create an environment in which it was easier to be inactive than it was to be active. The physical and cultural environment was one which did not enable children to play outside and to be active through play⁵⁵. Reducing car usage would better allow children to be active outside, and for adults to improve their connectedness by getting to know their neighbours⁵⁶.

5.1.74 People in cars would suffer from less pollution (we note evidence suggesting that the impact of air pollution on those in cars may be worse than for

⁴⁹ Drawn from oral evidence given to the Commission by Lucy Saunders, Public Health Specialist – Transport & Public Realm, TfL and GLA

⁵⁰ National Child Measurement Programme (NCMP) data drawn from a submission to Children and Young People's Scrutiny Commission by Public Health - http://mginternet.hackney.gov.uk/documents/s51926/CDM-17729897-v1-CYPS_OS_Childhood_Obesity_Update_1116.pdf

⁵¹ Drawn from oral evidence given to the Commission by Lucy Saunders, Public Health Specialist – Transport & Public Realm, TfL and GLA

⁵² Description of a healthy-weight environment within the Town and Country Planning Association's report 'Planning Healthy-Weight Environments (2014) cited in Faculty of Public Health briefing statement Local action to mitigate the health impacts of cars, July 2016

⁵³ Faculty of Public Health briefing statement Local action to mitigate the health impacts of cars, July 2016

⁵⁴ Drawn from oral evidence given to the Commission by Lucy Saunders, Public Health Specialist – Transport & Public Realm, TfL and GLA

⁵⁵ Drawn from oral evidence given to the Commission by Lucy Saunders, Public Health Specialist – Transport & Public Realm, TfL and GLA

⁵⁶ Faculty of Public Health briefing statement Local action to mitigate the health impacts of cars, July 2016

pedestrians and cyclists sharing the environment⁵⁷). Car drivers also suffer from noise pollution and from a limiting of their physical mobility.

5.1.75 We heard that filtered permeability had a role in achieving these improvements, and were recommended by the Faculty of Public Health as one of the measures which local authorities can introduce to restrict the through flow of motor traffic.

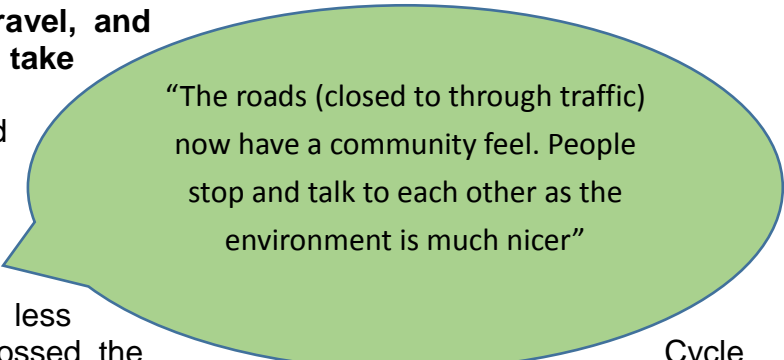
5.1.76 Part of the evidence gathering for this review involved the Commission holding focus group sessions with samples of residents who had been affected by a recent filtered permeability scheme introduced in their local area. One was held with a group who were supportive of the changes and one with those who were against.

5.1.77 During the discussion with residents who supportive of the scheme we heard how the wider benefits mentioned above were being felt directly by some of those living in the local area.

Extract of notes of focus group discussions on road closure and filtered permeability schemes.

Safer for active forms of travel, and encouraging residents to take alternatives to cars

We heard that cycling had been made safer as a result of the changes. One resident said that the move to close a number of streets to through traffic meant that there were less points through which cars crossed the Superhighway. Parents found that trips to and from schools were easier, safer and more pleasant.



“The roads (closed to through traffic) now have a community feel. People stop and talk to each other as the environment is much nicer”

Cycle

One resident living on a street closed to through traffic had seen more people walking than previously. Another felt that there had been a marked reduction in heavy traffic in the area generally.

Cleaner and quieter

The streets closed to through traffic felt cleaner and safer. There was a sense that public space had been retaken by residents.

We heard of the individual-level benefits felt by some residents living on roads which had been closed. Residents could leave their windows open at night without being woken by traffic and horns. Two said that they could hear birdsong in the morning for the first time for years. One said that he was now able to work at home

⁵⁷ Atmospheric Environment Volume 41, Issue 23, July 2007, Pages 4781–4810 - <http://www.sciencedirect.com/science/article/pii/S1352231007001343>

without constant noise disruption.

Disbenefits

- 5.1.78 We have reached a view that filtered permeability schemes in Hackney have the potential to help tackle (or contain exacerbations of) air pollution issues related to transport, and to also deliver a wider range of health and environmental benefits.
- 5.1.79 However, a range of evidence shows that schemes are likely to deliver disbenefits also. Our focus group session with residents opposed to a scheme in their area highlighted the significantly detrimental personal impact that these can have.
- 5.1.80 The principal disbenefit of schemes takes the form of displacement of shares of the traffic previously using roads that have been closed, to surrounding ones remaining open. This is an issue recognised by those advocating schemes as beneficial on an overall level⁵⁸.
- 5.1.81 The issue of displacement is one that brings questions around equality; both evidence that we have heard from the relevant Cabinet Member of the Council, officers and external experts has confirmed that depending on the locations of their homes, some residents will see direct environmental improvements to their streets, while some will see detrimental effects.
- 5.1.82 We have reached a view that the extent to which displacement may be legitimately tolerated as a disbenefit of a scheme, is dependent on the characteristics of the roads experiencing the displacement.
- 5.1.83 We understand that there is significant focus by the Council on using filtered permeability to help reduce the negative impacts of through traffic and rat running on more minor residential roads⁵⁹.
- 5.1.84 This focus is consistent with the use of filtered permeability schemes generally; the representative of TfL giving evidence to this review advised the Commission that schemes were commonly designed to move away traffic from residential roads, with those continuing to drive needing to use busier main roads.
- 5.1.85 We heard convincing evidence that this was an appropriate approach due to the characteristics of main roads meaning that pollutants did not deliver as much harm as they would in minor roads.

⁵⁸ Whilst finding that a majority of case studies schemes to have reduced traffic, the *Disappearing traffic? The story so far* study still found that schemes could increase problems on surrounding streets. Council Officers and external experts giving evidence to us directly have all stated that even well thought out and designed schemes will see some displacement affect.

⁵⁹ Informed from a paper submitted to the Commission by Streetscene paragraphs 4 and 5 - [http://mginternet.hackney.gov.uk/documents/s52672/CDM-17883543-v1-AQ_Scrutiny -
_Road_Closure-Filtering_V3.pdf](http://mginternet.hackney.gov.uk/documents/s52672/CDM-17883543-v1-AQ_Scrutiny_-_Road_Closure-Filtering_V3.pdf)

5.1.86 This was due to their wider road and pavement areas, and this meaning that pedestrians and buildings were further away from the pollutants emitting from vehicles than pedestrians and buildings were on main roads.

5.1.87 We were cited evidence given to the City of London Health and Wellbeing Board on Air Pollution that increasing the distance of a source of pollution (which is usually traffic) from those who are breathing it can significantly reduce their exposure levels. Reducing exposure by a few metres could reduce exposure by 20 – 50%.

5.1.88 We can appreciate that the displacement of traffic onto major roads following the delivery of schemes in residential streets is likely to be a significant disbenefit. This is particularly the case in London and Hackney, which we suspect contain higher prevalence's of residential homes. However, we have reached a view that if the disbenefits of a scheme are limited to dispersal to main roads, then it could not be seen to outweigh the benefits delivered in terms of reduced traffic on more minor roads, and on an overall level.

5.1.89 Where we have greater concern is around schemes displacing traffic from smaller roads onto other smaller roads.

5.1.90 We heard from TfL that schemes needed to be given time to bed in and that further to this, dispersal would be reduced. The representative pointed to the Mini Hollands scheme delivered in Waltham Forest some time previously. Whilst there had been issues in the roads close to the effected ones, these had dissipated to a large extent.

5.1.91 Hackney's Council's Cabinet Member with oversight of schemes in the borough said that it was important to acknowledge that there would be dispersal onto minor roads in addition to major ones, at least for the shorter term.

5.1.92 The Cabinet Member explained to the Commission that the Council had worked on the basis of gauging the overall impact on the area of new schemes before decisions were made. Alongside this, there was pre and post discussion with residents who had been adversely affected in order that solutions could be found to these issues.

5.1.93 Our focus group discussion with residents opposed to a scheme in their area highlighted the significantly detrimental impacts that schemes can have in terms of displacement. This very much included narrow residential streets adjacent to some of those closed.

Extract of notes of focus group discussions on road closure and filtered permeability schemes.

Disbenefits

Dispersal onto residential roads – creating safety issues, anti-social behaviour and pollution

Residents living on two roads local to those closed to through traffic – Walford Road and Brighton Road – described significant dispersal from the scheme.

The issues which had been resolved on streets that had been closed to through traffic had become more pronounced on those remaining open.

“8 routes through side roads available between the A10 and Islington before the changes. Now there are 2, and our streets are taking the impact”.

Dispersal was having an impact on driver behaviour.

Both roads were narrow with cars parked on both sides. The added congestion meant that gaps to get through were fewer and drivers sought to make the most of opportunities by speeding through. Passing places were inadequately sized and spread. Pedestrians and cyclists were having difficulty navigating streets in this setting.

Stand offs between drivers not willing to give way were common, with residents suffering from the resulting car horn noise and other anti-social behaviour. Motorcyclists unable to squeeze through traffic on the roads mounted pavements.

“Our roads are narrow. Now nearly every time you open your front door there is a traffic jam right in front of you. I now have asthma and it feels like it is related to the increased traffic”.

A resident often witnessed minor accidents.

The roads which had remained open were felt to be suffering from higher pollution levels.

Disbenefits were expected to continue

When asked, residents who were against the schemes said that they did not feel the volume of dispersed traffic on their roads to have reduced since the scheme was first implemented. They felt that in many cases drivers continued to look for cut-throughs rather than to use main roads. The traffic included work vans (including HGVs), minicabs and school vehicles. Both groups said that with satellite navigation systems directing drivers down the route which would be quickest at any one time, this issue would continue if changes were not made.

There was scepticism among residents against the scheme that it would lead to less car usage.

Disbenefits were a source of inequality

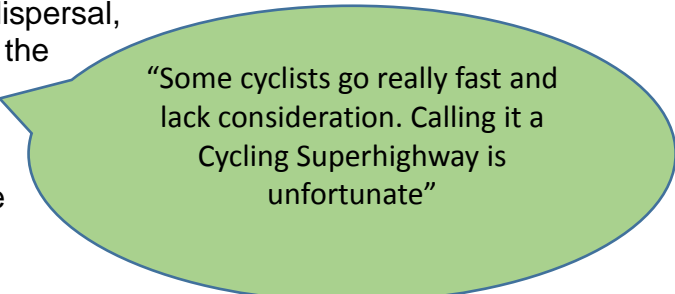
A resident said that she felt that the way the scheme had been designed had created a polarised set of experiences. The 6 roads which had been

“There was an equal distribution of traffic along 8 roads. Now 6 roads are very nice and 2 are a bottleneck...this does not fit in with Hackney a Place for Everyone strategy”.

changed were now quieter and nicer places. However, closing so many and leaving only 2 open meant that those remaining had suffered very heavy consequences. She said that closing fewer roads would have been a fairer approach. Walford Road and Brighton Road had high levels of pollution and traffic flow before the changes which were similar to the largest of the closed roads, and this had now got worse.

The same resident pointed out that the more major roads where traffic was encouraged onto – the A10 and Crossway – had high densities of social housing and already had high levels of pollution in advance of the changes. The impact of the scheme would therefore be felt disproportionately by lower income groups.

5.1.94 In addition to disbenefits around dispersal, there was a common view that the scheme affecting them – the traffic reduction scheme in the Wordsworth Road area as part of the CS1 – had helped to enable poor behaviour from some cyclists.



“Some cyclists go really fast and lack consideration. Calling it a Cycling Superhighway is unfortunate”

5.1.95 Both groups were supportive of general steps to make roads more conducive to cycling. However, both reported issues with the speeds travelled by some. This issue could make it difficult for pedestrians to cross roads within the scheme and neighbouring it. Both said that calming measures were needed.

The Commission’s view on filtered permeability and road closure schemes, and our support for future schemes.

5.1.96 We are concerned about the disbenefits of schemes.

5.1.97 However, we have reached a view that an increase in traffic on main roads should be treated as a tolerable disbenefit of schemes reducing traffic on narrow minor roads. This is due to the characteristics of main roads meaning that pollutants do not deliver as much harm as they would in minor roads.

5.1.98 Where we have greater concern is around schemes which have had a dispersal effect on streets with similar characteristics to the treated ones - so narrow residential roads – at least in the short term.

5.1.99 Our focus group with residents living on minor roads who were suffering the effects of dispersal highlighted how detrimental these could be, and we are very sympathetic to this.

5.1.100 We support the work of the relevant Cabinet Member in ensuring that there is ongoing discussion with residents who had been adversely affected by schemes in order that solutions can be found to the issues.

5.1.101 In addition, we feel that there are learning points for both TfL and the Council from recent schemes which have been delivered here. Recommendations 3 to 7 reflect this.

5.1.102 However – after weighing up the range of evidence - we have still reached a view that we are supportive of the Council’s previous and future use of filtered permeability and road closures to help address transport and public health related challenges in the area.

Recommendation 2 – That the Council rolls out a programme of filtered permeability schemes

We have reached a view that filtered permeability schemes should be used as one of the Council’s responses to the transport related challenges around growth.

We are convinced that they are likely to reduce levels of traffic and pollution on an overall level, and to deliver wider ranging health and environmental benefits in addition.

We ask that the Council sets out a programme of future schemes.

Recommendation 3 – That the Council publishes a report on the impact of the CS1 De Beauvoir and Wordsworth Road schemes

We look forward to the Council completing their final analysis of the traffic and air quality impact of its recent major schemes.

Upon completion of the analysis, we ask that the Council uses this and other evidence (including the findings of this review) to produce a report on the impact of the CS1 De Beauvoir and Wordsworth Road schemes, the successes in their delivery, and lessons learnt.

We see these as innovative schemes which could help inform approaches in other areas.

Considerations, communications and consultation on schemes prior to decision

5.1.103 This review aimed to explore the types of evidence which inform decisions on the design and delivery of schemes, and the weight that these different considerations are given.

5.1.104 Within this, we have gained an insight into the consultation processes followed by the Council and the information contained within them as part of the process. We have also reviewed the details of a consultation delivered by Hackney and another delivered by TfL (for a scheme delivered in Hackney).

5.1.105 **Considerations and engagement prior to finalisation of proposals for new schemes.** In most cases the Council will engage a number of interest groups during the development stage of new proposals. This is in order that they can help mould the actual design and approach of the scheme⁶⁰

⁶⁰ Records of discussion at Commission meeting of 8th February 2017 and from tabled paper both available via - mginternet.hackney.gov.uk/mgAi.aspx?ID=27748

5.1.106 Groups liaised with include groups aiming to better facilitate walking (Living Streets⁶¹), cycling (London Cycling Campaign⁶²) and the influencing of change by disabled people living in the borough (Hackney Disability BackUp⁶³)⁶⁴.

5.1.107 In addition and prior to the finalisation of any proposals, the Council will liaise with statutory bodies including the police, ambulance service, TfL buses in order to seek their views and to gauge any concerns around detrimental impacts on Hackney residents and those travelling through the borough. They also engage Councillors of the Ward which will immediately affected by a scheme, and the Lead Cabinet Member. This dialogue enables the service to accommodate / address concerns before proposals are finalised and published⁶⁵.

5.1.108 We are supportive of the Council's approach in involving a wide range of groups in the development and design of schemes.

5.1.109 **Engagement and consultation at the point that designs are finalised.** Upon Council-designed schemes being finalised, consultation documents are created. These are made available online.

5.1.110 For those living within the catchment area of the proposed scheme (generally defined as the roads in which the scheme's measures would be situated and surrounding roads including those which traffic dispersed from a scheme would be expected to be diverted onto), paper copies of these documents are provided by post, with freepost envelopes which can be used to send back responses for consideration⁶⁶.

5.1.111 As an example, Figure 3 below is a map marked by the defined catchment area for a proposed range of traffic management options which the Council proposed in the London Fields Area. More than 10,000 paper consultation documents were delivered to addresses within this area.

5.1.112 In addition to posting packs, for larger proposed schemes, the Council will arrange and advertise drop in sessions for residents to speak to officers directly.

Figure 3 – London Fields Traffic Management option proposals - map of defined catchment area⁶⁷

⁶¹ www.livingstreets.org.uk/who-we-are/our-organisation

⁶² lcc.org.uk/pages/about-us

⁶³ www.disabilitybackup.org.uk

⁶⁴ Records of discussion at Commission meeting of 8th February 2017 and from tabled paper both available via - mginternet.hackney.gov.uk/mgAi.aspx?ID=27748

⁶⁵ Ibid (as above)

⁶⁶ Ibid (as above)

⁶⁷ Drawn from London Fields Traffic Management Research Report (consultation.hackney.gov.uk/streetscene/london-fields-middleton-road-traffic-management-sc/results/london-fields-consultation-report.pdf)



5.1.113 The Council recognises that residents living in areas adjacent to schemes and those accessing the area from further afield may be affected by the results of them.

5.1.114 Whilst we understand that due to cost factors postal packs are restricted to those in the immediate area, we heard how the Council works to make the documents accessible online, and to advertise them in the local press (in the London Fields example, the consultation featured in Hackney Today with press releases being sent to local media and ethnic press). This, and the engagement of the groups mentioned earlier – is seen by the Council as being the most pragmatic and effective way of engaging as broadly as possible.

5.1.115 We feel this approach of engagement to be a reasonable one.

5.1.116 **TfL led consultations.** It is important to note that for a number of the recent schemes proposed (and then implemented) in Hackney – in particular the CS1 De Beauvoir and Wordsworth Road area schemes - consultation

processes were managed by TfL. This review has not questioned TfL directly on the processes that they follow. However, reports on the consultation findings for schemes show them to have followed a similar approach to the Council.

5.1.117 For example, for the Wordsworth road area proposals, 9,000 paper copies of consultation documents were sent to addresses within a defined catchment area. The survey was made available online and publicised by TfL through emails being sent to 50,000 people known to cycle, drive or use public transport in the area, and to 1,000 stakeholders. Drop in sessions were held in the local area⁶⁸. The Commission was also advised that the Council helped promote the consultations by advertising them online and in the press.

5.1.118 **Content of Council consultation documents.** The Commission was interested to explore the range of information that the Council provides within its consultation documents. Papers provided to us said that information leaflets accompanying consultation questionnaires would provide the details on the purpose of schemes, the benefits that they would deliver, and their impact.

5.1.119 We are supportive of an approach that provides a wide range of information. Our discussions within this review and outside of it as part of our role as local Councillors has highlighted the divided opinions towards schemes. We feel that setting out in consultation documents the wider environment in which schemes are being considered, the purpose of individual schemes, and the benefits and disbenefits that they are expected to achieve, can be one route towards more clearly sharing with residents our reasoning for them.

5.1.120 As part of this review we reviewed the information provided in the consultation document for the London Fields area scheme⁶⁹.

5.1.121 This document shows the Council to have set out the reasoning for proposing changes for the area (focusing on the creation of one of a set of backstreet / park / waterway routes to better enable cycling by those wanting to use quieter, low-traffic routes).

5.1.122 It sets out the wider range of benefits that encouraging cleaner and greener transport (in particular walking and cycling) could have. Benefits listed included the helping to manage demand on the road network and public transport network in the context of a growing London, improving road safety and air quality, improving personal mobility, and creating safer, cleaner and more pleasant neighbourhoods.

⁶⁸ Drawn from CS1 Wordsworth Road area – Consultation Report (consultations.tfl.gov.uk/cycling/cs1-wordsworth-road/user_uploads/cs1-wordsworth-consultation-report-final.pdf)

⁶⁹ https://consultation.hackney.gov.uk/streetscene/london-fields-middleton-road-traffic-management-sc/supporting_documents/PJ61347_Quietway%202%204pp%20A4%20Leaflet_v5.pdf

5.1.123 The range of benefits that schemes can bring which are detailed in the consultation documentation are consistent with those that the Commission has heard about during this review. We support the Council sharing this information in its communications.

5.1.124 However – we would suggest that this information be expanded on, in particular relation to air quality, the need for action to be taken to mitigate the impact of population growth here and elsewhere, and the other related actions that the Council is taking to facilitate options other than car ownership.

5.1.125 This view has been reached in part from a discussion with residents affected by the Wordsworth road area scheme.

5.1.126 Despite being engaged with the topic of road closures and filtered permeability, neither group had been made aware of the context in which the Council was delivering these initiatives. They had not been made aware of the population and employment growth factors in Hackney, London and the South East which was further driving the need to encourage vehicles away from areas and to facilitate alternatives.

5.1.127 There was not an awareness either of the range of initiatives which were being delivered alongside them; greater availability of car club vehicles, encouraging cleaner vehicle types, for example.

5.1.128 Although the consultation for this scheme was delivered by TfL rather than the Council, we still see the lack of information that even a particularly engaged group had demonstrates the need for these consultations to give as greater depth of information as possible.

Recommendation 4 – greater context being given in consultation documents for filtered permeability or road closure scheme proposals.

The content of the supporting documents for the London Fields area traffic management options consultation from January 2016 evidences that for some time the Council has laid out the reasoning for proposed schemes and the wider benefits that they are expected to deliver.

This has included notes around improvements to air quality, road safety, personal mobility that delivering reductions in car use will achieve, and the issues from growth in Hackney and London generally which schemes will help to manage.

However, we ask that the information offered (at least for larger schemes) is more detailed.

We ask that the information sets out:

- That schemes as per the ones proposed have been evidenced to help reduce traffic and avoidable car use in areas similar to Hackney.
- That road transport is shown to be the key current cause of air pollution in Hackney (backed up by a statistical example such as one submitted to the Commission showing the high shares of pollution that road transport accounts

for).

- In a clear way the challenge that the borough is facing in terms of managing growth. Using statistics around recent and expected population growth in Hackney and London to highlight this.
- How these schemes are one of the ways that the Council is trying to facilitate travel clean and green travel through the borough in a context of growth in surrounding areas.
- That these schemes are one of a range of measures being taken to enable residents to travel differently.
- Any expected disbenefits of schemes (greater traffic levels on sections of main roads for example) and explanations as to why the benefits are felt to outweigh these

5.1.129 **Content of TfL consultation document.** We also feel that there is learning for TfL from the consultations that they delivered for CS1 schemes proposed for areas in Hackney.

5.1.130 The two consultation documents that TfL produced for the schemes in the Wordsworth Road⁷⁰ De Beauvoir Road⁷¹ areas, contained a range of useful information.

5.1.131 This included the reasoning for the proposals (the making of areas safer and more pleasant places in which to live, walk and cycle through the reduction of non-local motor traffic using some residential streets). Detail was given on the range of measures which would be delivered within the schemes, and the beneficial impacts of each of these.

5.1.132 However, unlike in the documentation for the Hackney-led consultation, there was not reference to the wider environment in which schemes were being considered. The challenge of managing growth in Hackney and London generally was not mentioned. Whilst a reduction in motor traffic was stated as the aim of the scheme, the impact of traffic on air quality was not mentioned.

5.1.133 This - in tandem with the finding from our focus group that residents living in one of these areas were not aware of the wider challenges that schemes were aiming to address – again leaves us with a view that consultation documents should set this out.

5.1.134 As an additional point and as mentioned earlier, we heard about the significant disbenefits that the scheme had had. Principally, this was around the dispersal of some traffic to narrow residential roads adjacent to the roads

⁷⁰ https://consultations.tfl.gov.uk/cycling/cs1-wordsworth-road/user_uploads/cs1-wordsworth-consultation-report-final.pdf

⁷¹ https://consultations.tfl.gov.uk/cycling/cs1-de-beauvoir/user_uploads/cs1-de-beauvoir-consultation-report.pdf

treated in the Wordsworth Road area, although we also heard about dispersal to main roads with already high levels of pollution.

5.1.135 We feel that the consultation documents would have benefitted from containing clear information of any foreseen likely disbenefits of the scheme, in addition to the positive expected impacts.

5.1.136 We feel that this would give fuller assurance to residents that schemes had been developed in a thorough and well thought out way, and that proposals were only being made after a consideration of all the likely advantages and disadvantages of a scheme were weighed against one another.

Recommendation 5 – For the Council to work with TfL to seek improved levels of information being given in the consultation documentation they deliver.

We feel that there is learning for TfL from recent consultations delivered for CS1 related schemes proposed for areas in Hackney.

The two consultation documents that TfL produced for the schemes in the Wordsworth Road⁷² De Beauvoir Road⁷³ areas, contained a range of useful information.

However, unlike in the documentation for the Hackney-led consultation, there was not reference to the wider environment in which schemes were being considered. The challenge of managing growth in Hackney and London generally was not mentioned. Whilst a reduction in motor traffic was stated as the aim of the scheme, the impact of traffic on air quality was not given.

This - in tandem with the finding from our focus group that residents living in one of these areas were not aware of the wider challenges that schemes were aiming to address – again leaves us with a view that consultation documents should set this out.

We also feel that clearly setting out the foreseen disbenefits of schemes in addition to the expected benefits would give fuller assurance to residents that schemes had been developed in a thorough and well thought out way.

In the event of similar consultations being delivered by TfL in future, we ask that the Council works with TfL to try to secure improvements to levels of information given in consultation documents.

We ask that the Council seeks for TfL led consultations for schemes in Hackney set out:

- That schemes as per the ones proposed have been evidenced to help reduce traffic and avoidable car use in areas similar to Hackney.

⁷² https://consultations.tfl.gov.uk/cycling/cs1-wordsworth-road/user_uploads/cs1-wordsworth-consultation-report-final.pdf

⁷³ https://consultations.tfl.gov.uk/cycling/cs1-de-beauvoir/user_uploads/cs1-de-beauvoir-consultation-report.pdf

- That road transport is shown to be the key current cause of air pollution in Hackney (backed up by a statistical example such as one submitted to the Commission showing the high shares of pollution that road transport accounts for).
- In a clear way the challenge that the borough is facing in terms of managing growth. Using statistics around recent and expected population growth in Hackney and London to highlight this.
- How these schemes are one of the ways that the Council is trying to facilitate travel clean and green travel through the borough in a context of growth in surrounding areas.
- That these schemes are one of a range of measures being taken to enable residents to travel differently.
- Any expected disbenefits of schemes (greater traffic levels on sections of main roads for example) and explanations as to why the benefits are felt to outweigh these

Analysis of survey results

5.1.137 We heard that for Council schemes, and following the closure of a consultation, the responses are analysed and the findings presented in a report. This report gives a factual summary of the responses, exploring the balance between those who were supportive of it and those who were against, and the information received from qualitative questions.

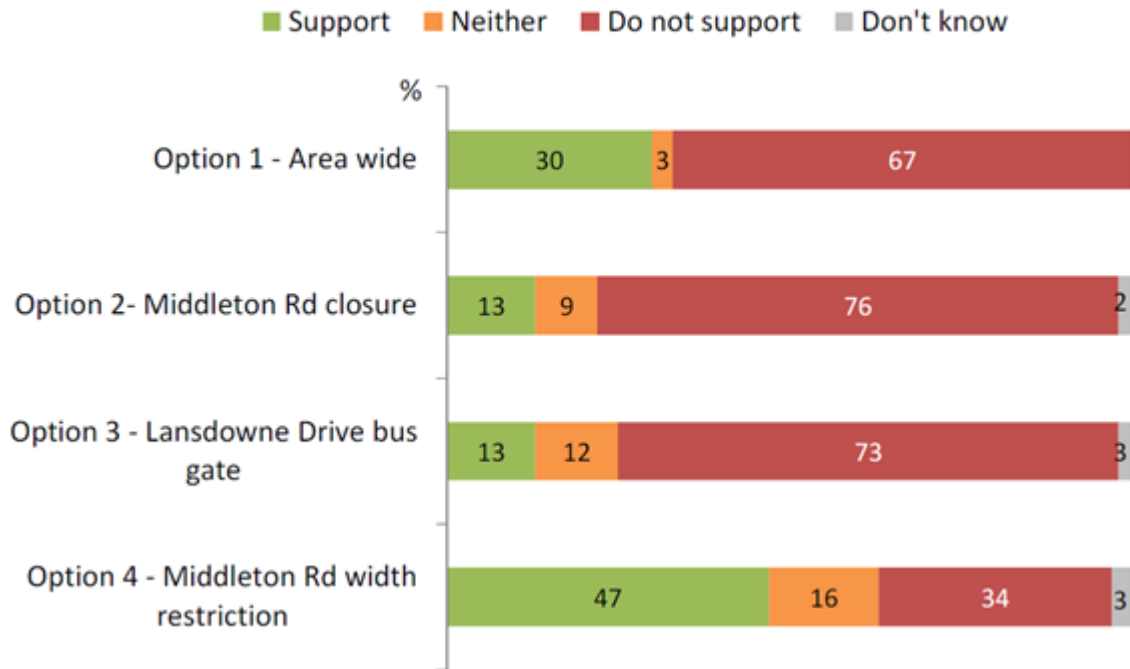
5.1.138 As well as giving the overall results in terms of levels of support for schemes, the analysis of survey findings will generally include an exploration of views among those living in the immediate area of a scheme, compared to the views of those responding to the consultation who live outside of it. Figures 4 and 5 show examples of this.

5.1.139 We are supportive of this depth of analysis and it gave us assurance to our questions around whether there was a risk of the views of those who are most effected by schemes, being masked by high numbers of responses from those living outside.

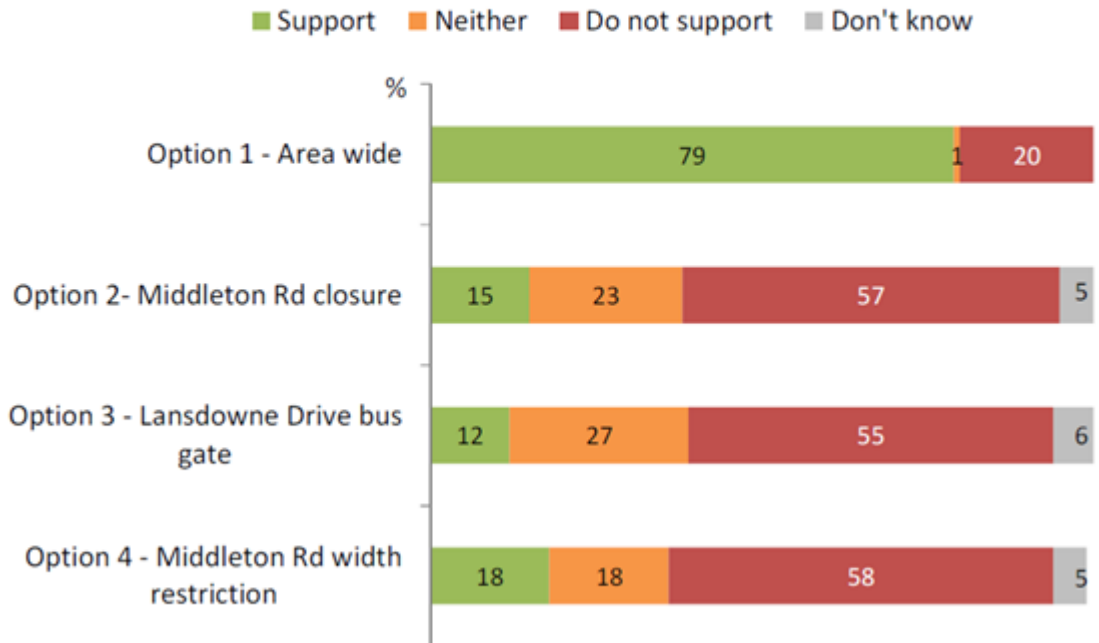
Figures 4 and 5 – charts drawn from the report on the findings of a consultation on a number of traffic management options in the London Fields area⁷⁴.

⁷⁴ consultation.hackney.gov.uk/streetscene/london-fields-middleton-road-traffic-management-sc/results/london-fields-consultation-report.pdf

Level of Support or Opposition for each Option
 – responders in London Fields catchment area



Level of Support or Opposition for each Option
 – responders outside London Fields catchment area



5.1.140 We understand that the report produced will in general lay out the way forward that has been decided upon, following the analysis that has been carried out⁷⁵.

Weight given to items of evidence – consultation results not the only determinant.

5.1.141 We heard from the Council that whilst consultation responses were analysed and the findings used to help shape and inform final decisions, that they were not treated as referendums. This means that the Council's decision to go ahead or not was not fully dependent on whether a majority supported proposals or not.

5.1.142 This was due to the results of consultations forming only one of the items of information to inform a final decision. The Council advised that a range of other factors were taken into account in the final decision. This included any benefits that the scheme had been identified as having, and the responses from statutory bodies to the proposals.

5.1.143 Officers acknowledged to the Commission that they needed to do more to ensure that consultation materials were clear in explaining that results would be considered along with a wider range of evidence, and that majority opposition would not necessarily lead to the abandonment of a scheme. We were advised that the Council had found that there were misconceptions in the community generally around the results of consultations establishing the definite way forward, and that in light of this documentation was being reviewed to make it clear that results to the consultation would be one item of the evidence considered.

5.1.144 We value the role of consultation in the area of road closures and filtered permeability. In particular, schemes can be modified and improved following feedback being received on proposals.

5.1.145 However, we also support the Council in using these findings as part of the evidence to inform final decisions, rather than treating them as a set of findings which on their own should establish the way forward. We support the use of a range of evidence – the input of interest groups, the views of statutory agencies and relevant services, along with the findings of the consultation analysis – to help design, shape and make a final decision on schemes.

5.1.146 Our research of some of the results of consultations on filtered permeability proposals has reinforced this view.

5.1.147 In 3 examples shared with us of Hackney-led scheme consultations, each drew response rates of between 10% and 16%.

⁷⁵ The London Fields scheme which we have used as an example in this report did not do so. This was due to the consultation analysis being carried out by an external provider rather than the Council directly. The Council then used this BDRC Continental produced report to make a decision which it reported on separately.

5.1.148 Our more intensive exploration of the results of another consultation – that delivered by TfL for the CS1 Wordsworth Road area scheme - again showed that the great majority of those who would be affected by scheme (and others) did not respond. It also showed significant shares of the responses which were received to have been submitted via a single organisation which had organised a campaign regarding the proposals. Appendix two sets out these findings in detail. Figure 6 below sets out the key facts as we see them.

Figure 6 Overview of responses to TfL for the CS1 Wordsworth Road area scheme

- 9,000 properties based 400 metres or less from the scheme were sent consultation forms
- More than 51,000 people on TfL’s road user contact list and 1000 defined stakeholders were emailed details of the consultation.
- Of the (approximately) 61,000 consulted, a total of 486 responses were received.
- More than a third (173) of these were provided via a single local organisation which campaigned against the proposals.
- Records show 1522 electors⁷⁶ to live in the minor roads TfL identified as being directly affected by the schemes. 122 responses were received from residents living on these roads. This suggests a response rate among those most affected of 8%.

5.1.149 Whilst we would very much expect the Council to consider the views of those responding to the consultations and to use this feedback to reach final decisions on whether schemes should go ahead and on any modifications which could improve them, we feel that the low response rates give further credibility to the approach of using other items of evidence also.

Recommendation 6 – The Council to report back to the Commission on the results of the review of consultation documentation, and the making more clear that the results will be considered along with a range of other evidence.

We heard from the Council that whilst consultation responses were analysed and the findings used to help shape and inform final decisions, that they were not treated as referendums. This means that the Council’s decision to go ahead or not was not fully dependent on whether a majority supported proposals or not.

We support the Council in using consultation findings as part of the evidence to inform final decisions. We agree that the findings (while being very useful) should not

⁷⁶ Based on Council Elections data

be used in isolation to establish the way forward.

Recent consultations on schemes have drawn response rates of between 10% and 16%⁷⁷. This gives further credibility to these not acting as the trump card in decisionmaking.

We support the use of a range of evidence – the input of interest groups, the views of statutory agencies and relevant services, along with the findings of the consultation analysis – to help design, shape and make a final decision on schemes.

We thank Officers for their acknowledgement that they needed to do more to ensure that consultation materials were clear in explaining that results would be considered along with a wider range of evidence, and that majority opposition would not necessarily lead to the abandonment of a scheme.

We were advised that documentation was being reviewed to make it clear that results to consultations would form part and not the only item of evidence on reaching final decision.

We support this work. We ask for an update on its completion.

Communications and engagement with affected residents after go live

5.1.150 Our discussions with residents affected by a filtered permeability scheme and our review of other evidence have demonstrated to us the importance of the Council maintaining dialogue and communications after the point of schemes being introduced.

5.1.151 We feel that residents should be updated on how the effects of schemes will be monitored and any early results of this monitoring.

5.1.152 We also see the need for clear guidance being available on how residents can provide feedback (in particular during live trials of schemes), how this will be taken into account, and on any immediate actions that the Council has or will take in response to this.

5.1.153 From its review of case studies, the *'Disappearing traffic? The story so far'* study found that in addition to ensuring that schemes were well designed, the management of public and media perceptions towards them was an important element towards ensuring their success.

5.1.154 It found that this could be achieved by monitoring the impacts / key issues of schemes and making this information quickly available so that it could enable debate around the impacts of a scheme to be well informed.

5.1.155 As mentioned earlier, this review has found that previous schemes delivered by the Council have not generally had impact analyses carried out. We are supportive of the Council now carrying out both air quality and traffic count impact analysis of schemes.

⁷⁷ Based on response rates shared with the Commission on three Hackney-led schemes

5.1.156 However, we do feel that there is learning from the Council from recent schemes in terms of the extent which residents were communicated with, after they had gone live.

5.1.157 While preparing for the discussion with residents affected by the scheme delivered in the Wordsworth Road area as part of this review, we noted that there was no clear information on the Council website around the monitoring which was being carried, how residents could feedback on their experiences, and how and when the evidence would be brought together to inform a decision on the way forward. This was despite this having been at a time when a statutory consultation was open.

5.1.158 We feel that the process could have benefitted from a dedicated webpage for the scheme giving this information, and any initial responses by the Council to the dispersal issues which were being reported by residents at this time. We also feel that this webpage could have impact monitoring data added to it at the point of it being made available. We feel that this would have better enabled the Council to be at the forefront of discussion and dialogue.

Recommendation 7 – that information webpages are available for new filtered permeability and road closure schemes.

We ask that for any future permeability schemes the Council creates webpages detailing the monitoring taking place to assess the impact of a scheme, how (if applicable) residents can feed back their experiences and suggested improvements for consideration, and how these will be taken into account.

Upon the monitoring being completed, we ask that this data is made available on the webpage at the earliest possible point.

5.1.159 **Being responsive and being seen to be responsive to concerns raised.** We feel that having dedicated webpages for schemes could be an avenue through which the Council can assure residents that it is as responsive as it can be to their concerns.

5.1.160 During the discussions with residents affected from the scheme delivered in the Wordsworth Road area we heard suggestions of improvements which could be made. This included ones around how the detrimental impacts on surrounding residential roads might be mitigated.

5.1.161 We do not have the expertise to give a view on whether the suggested actions would lead to an improvement to the scheme. However, we feel that the process could have benefitted from the Council working to keep dedicated webpages for schemes updated with summaries of responses received, and any early action that they could take in response to these.

5.1.162 Where issues could only practically be considered at the end of a trial period and at the point of a decision being made as to whether to make them permanent, then we feel that an explanation could be given as to why this is the case.

Extract of notes of focus group discussions on road closure and filtered permeability schemes.

Suggested improvements to the scheme

Scale back

Those against the scheme felt that it should be fully rethought and made smaller. Reducing the numbers of roads closed to through traffic would mean that the dispersal issues caused would be better spread.

Expand

Those supportive of the scheme felt that the dispersal affects should be managed by exploring solutions for those detrimentally affected.

Signage

There was a common view among both groups that signage of the scheme should be improved. Although the experimental scheme had been in place for some time drivers continued to turn into roads that they then found to have barriers on. This and their reversing back onto main roads caused safety issues. It was felt that signage on the main roads in advance of these roads would help this issue.

A suggestion was made that the signage should advise drivers that a road closure scheme was in operation, and that they should follow main roads.

Making main roads taking the traffic more flow-friendly

Part of the congestion on Crossway was due to drivers being able to turn right onto the A10. This held up traffic behind vehicles turning right. The turn right option should be removed.

Reviewing provision of the size and spread of passing places and the locations of cycle hangers on the open roads

Those against the scheme wanted more significant change than improving fluidity in the open roads. However, both groups mentioned that a cycle hanger was inappropriately located at one of the junctions of Walford Road which exacerbated the issues caused by dispersal. Both the size and spread of passing places should be reviewed to better allow traffic to move through.

Recommendation 8 – that information webpages for schemes give updates on feedback received, and the Council's response to this.

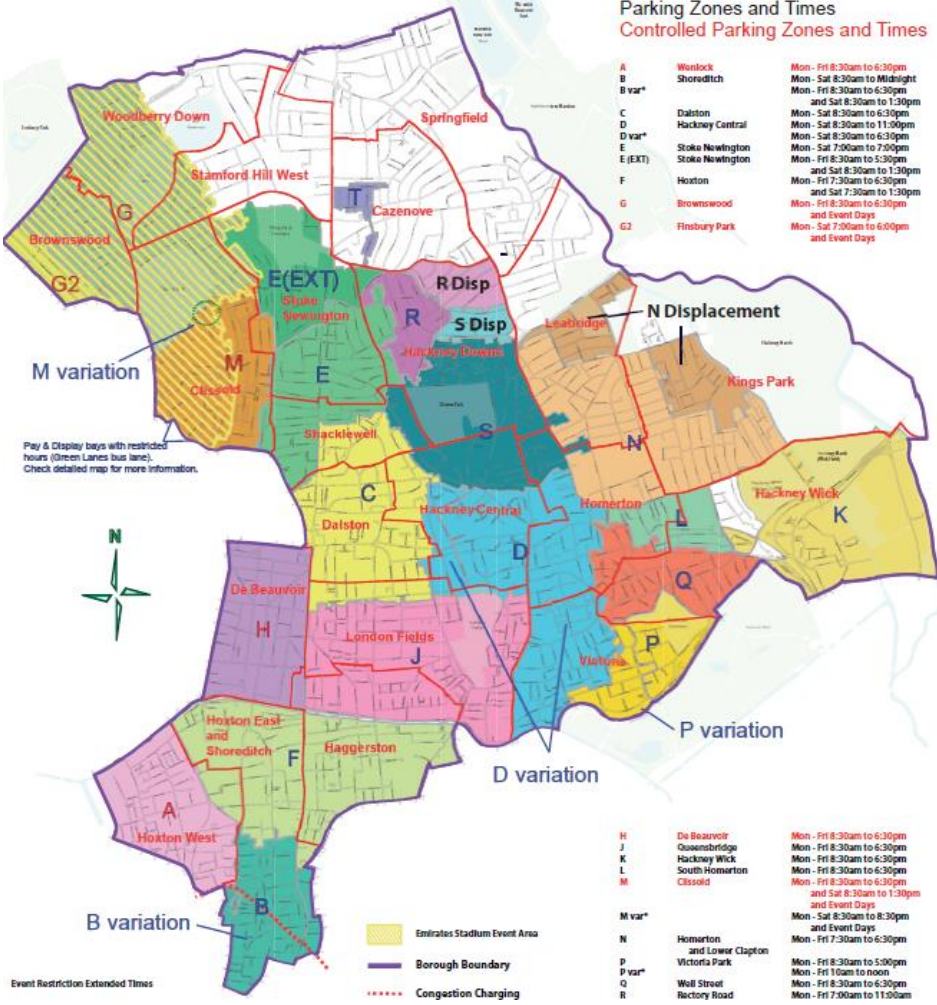
We ask that the information webpages created as part of recommendation 7, are updated during any live trial of schemes. We ask that these updates summarise the views and concerns received, and the response of the Council to these. Where it is not practical for the Council to take immediate action on the basis of the view or concern, we ask that explanations are given to this. We appreciate that there is unlikely to be capacity for updates to be made upon any new comment or view being received. However, we suggest that updates are added for each month that a live trial is in place.

5.2 Controlled Parking in relation to air quality

5.2.1 Parking Zones are areas where all kerbside space is controlled by either yellow lines or parking places. Parking Zones are the avenue through which the Council delivers controlled parking.

5.2.2 With some exceptions, vehicles parking in bays are required to display a parking permit. Permits are generally made available to residents living within the zones but not those living outside of it⁷⁸.

Figure 7 – Controlled Parking coverage in Hackney



5.2.3 The Council states that parking zones have been introduced to ‘improve parking conditions for local residents and businesses’ and to ‘help traffic, pedestrians and cyclists move safely in the borough’.

5.2.4 This said, we were advised that ongoing dialogue with residents in the borough who live in areas with currently uncontrolled parking is also linked with aims to improve air quality by reducing unnecessary vehicle movements, including commuting.

⁷⁸ The Council’s Parking Enforcement Plan gives fuller detail on the different types of controlled parking operating in Hackney - <http://www.hackney.gov.uk/pep>

5.2.5 We wanted to explore this aspect further. This was to gauge any available evidence on the impact or not of controlled parking on levels of air pollution. With data suggesting that the majority of traffic in some areas is not generated from Hackney itself, we wanted to explore whether restricting more parking areas to residents could have impacts on pollution levels in the areas concerned and wider areas also.

Capacity to help address pollution

Air Quality monitoring

5.2.6 As with filtered permeability schemes, the Council has not previously carried out air quality monitoring before and after the introduction of new controlled parking zones.

5.2.7 Also as with filtered permeability projects it has now moved to do so, with pre and post monitoring (through the use of monitoring tubes) planned for areas where CPZs were to be introduced. This is in order to build a dataset which might evidence more categorically the role that CPZs can play in the tackling of emission levels. We support this work⁷⁹.

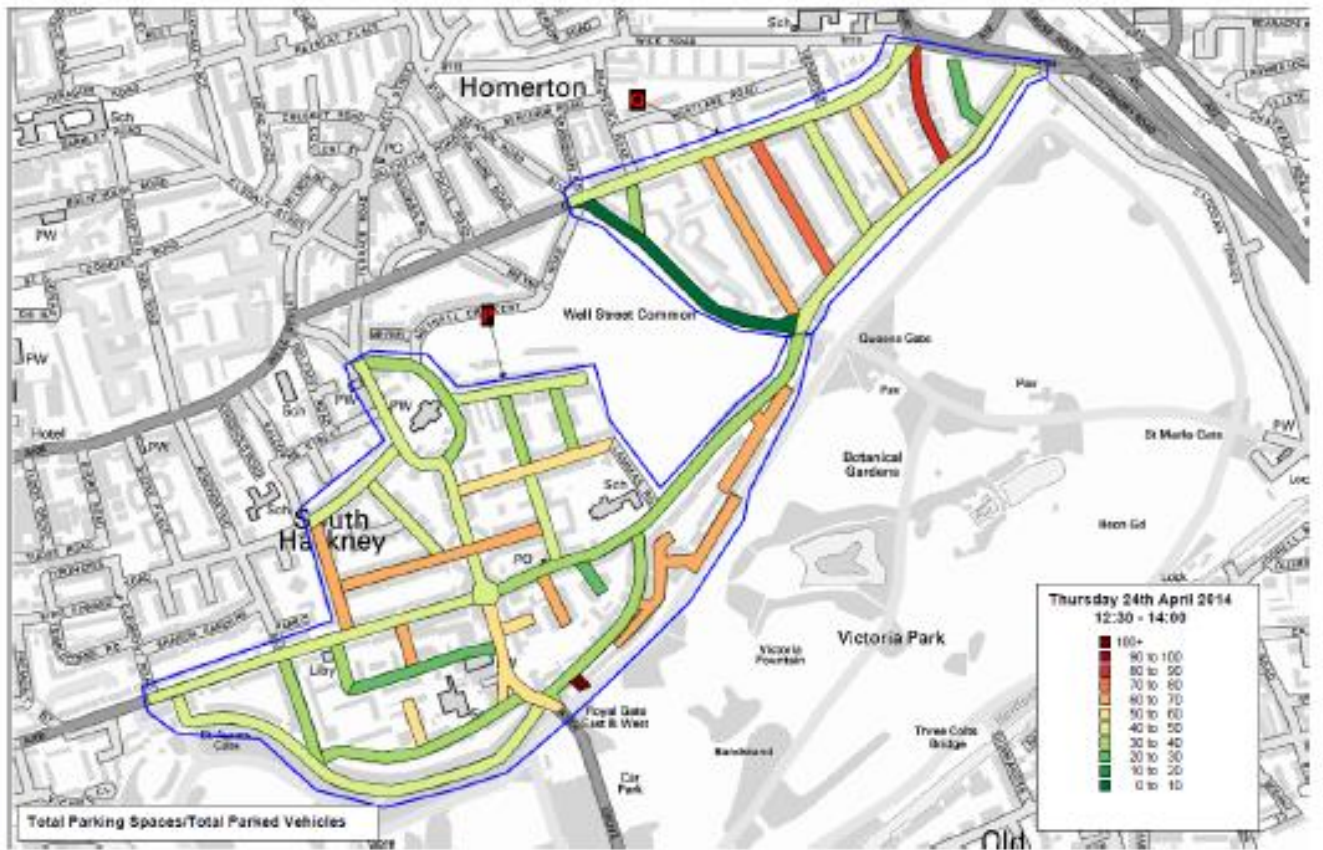
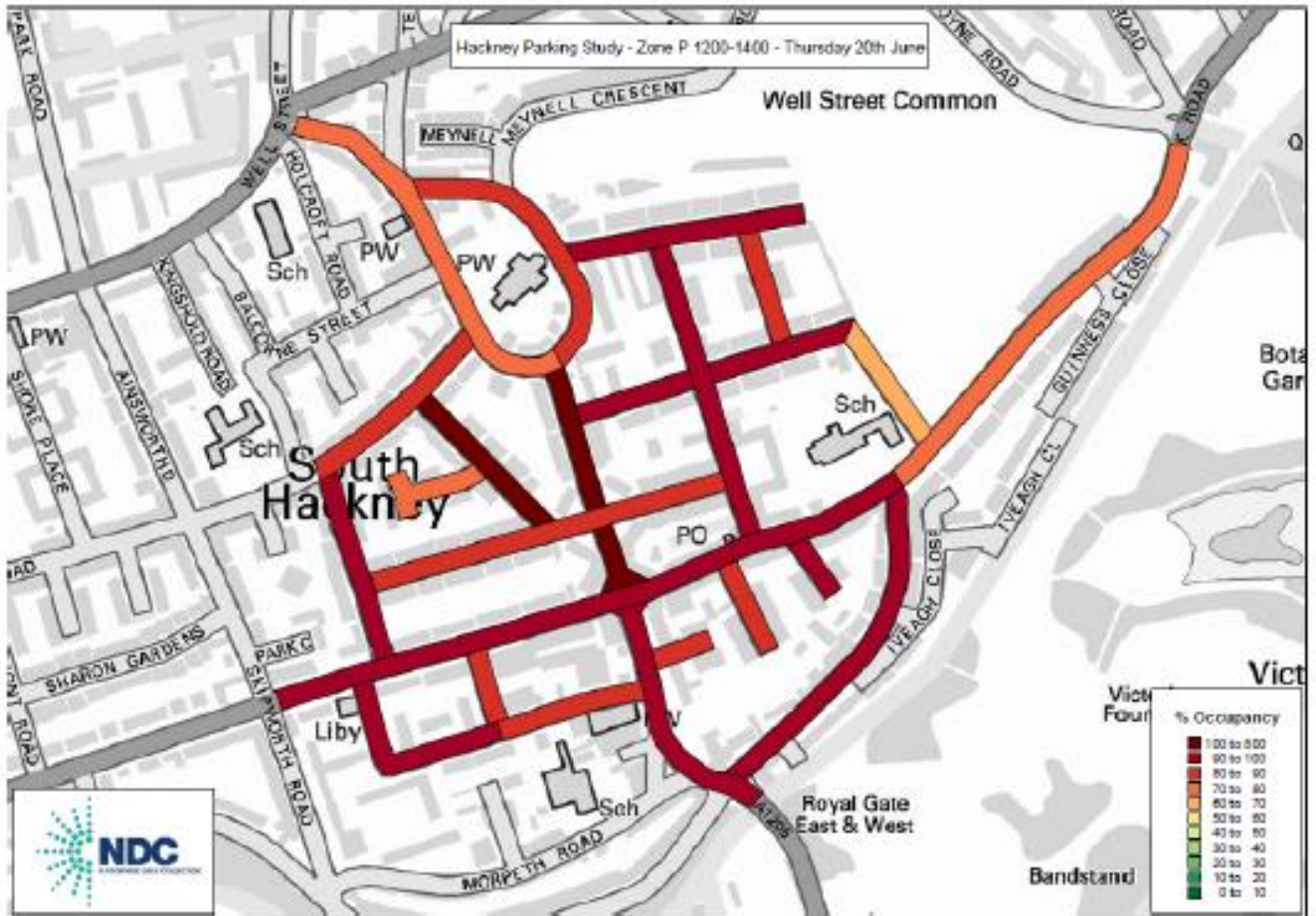
Impact on parking stress

5.2.8 Whilst not previously carrying out air quality monitoring on the impact of introducing controlled parking, the Council has gathered other evidence around vehicle presence in areas before and after the delivery of schemes.

5.2.9 The two maps below depict levels of parking stress in an area of Hackney before and after the introduction of a parking zone. They show that for most streets in the area, parking levels halved after parking controls were installed within them.

Figure 7 – map of parking occupancy levels in an area of the borough before and after the introduction of a CPZ

⁷⁹ Paper submitted to the Commission by the Parking and markets Service-
<http://mginternet.hackney.gov.uk/documents/s52674/Item%20-%20-%20Air%20Quality%20Reivew%20-%20Submission%20from%20Parking.pdf>



- 5.2.10 The paper provided to the Commission advised that the reduction in parking activity in the area demonstrated 'hundreds of few car journeys into and out of the borough each day, with corresponding reductions in pollutants⁸⁰'.
- 5.2.11 We do not agree that the maps can be used to definitively demonstrate this as they do not give consideration to any dispersal to other (uncontrolled) areas of the borough (or those just outside of it) caused by the scheme and any corresponding increases pollution levels in these areas resulting from this.
- 5.2.12 However, we certainly feel the maps demonstrate that areas in which schemes are delivered are used less as an end point for parking ('trip-ends'). This means that for the areas in which they are introduced, pollution levels can be seen to be lowered due to a lower number of motorised vehicles accessing them.
- 5.2.13 We were also persuaded that reducing 'trip-ends' in an area delivers air quality benefits in addition those associated with the removal of emissions from vehicles no longer entering it. This is in relation to lower levels of parking stress making it far easier for those who are eligible to continue parking in the area (generally those with a permit), to find a parking space.
- 5.2.14 The map above shows that parking occupancy rates in most streets within an area pre the introduction of a CPZ were 90% or above. Reducing these rates to more reasonable levels reduces the length of driving time that is spent searching for a space, and the emissions expended as a result.

Parking Controls as a platform for other progressive measures to tackle air pollution

- 5.2.15 Some of the policies that the Council has implemented which have roles to play in the improvement of air quality, are intrinsically reliant on controlled parking being in place.
- 5.2.16 On parking permits, since September 2016 the Council has amended its charging policy for street permits, with prices set incrementally according to the emission levels of vehicles. Diesel vehicles incur an additional levy within the scheme. Electric vehicles incur a zero charge.
- 5.2.17 For new housing developments, and in order to help mitigate levels of car ownership which growth pressures might otherwise bring, the Council applies Car Free conditions to the majority of applications which it approves.

⁸⁰ Paper submitted to the Commission by the Parking and markets Service-
<http://mginternet.hackney.gov.uk/documents/s52674/Item%205%20-%20Air%20Quality%20Reivew%20-%20Submission%20from%20Parking.pdf>

- 5.2.18 The measures around parking permits which have been taken in order to help influence environmentally purchasing decisions, would not be possible if parking controls were not in place.
- 5.2.19 The attachment of car free conditions to approvals for new developments would be meaningless if the delivery of them took place in areas within or very close to, uncontrolled parking areas.
- 5.2.20 In addition, we understand that for developments being delivered in uncontrolled parking areas, the Council is generally unable to insist on car free clauses being attached to approvals which could then take affect from any point that a CPZ is introduced⁸¹.
- 5.2.21 The use of emissions-related charging for parking permits (and pay-and-display) and car free development clauses are approaches recommended by the Faculty of Public Health as ways that the health impact of cars can be mitigated at a local level⁸².
- 5.2.22 We are persuaded of the merits of these approaches, and note the existential role that parking controls have in their delivery.
- 5.2.23 Indeed, we feel that the approach of emissions-related charging is one which should also be applied to pricing of permits for parking on the Council's estates; they are currently set at one standard rate. To enable more consistency we also ask that the Council encourages Registered Housing Providers to follow the same approach on the estates that they manage.

Recommendation 9 – that the Council introduces environmental pricing to estate parking permits

The Commission is supportive of the Council using emissions-related charging for on street parking permits. We feel that this is a welcome initiative to help tackle air pollution.

However, we also note that permits for parking on the Council's housing estates are charged at a standard rate, and do not take vehicle emissions levels into consideration.

We ask that the Council applies emissions-related charging to its estate parking permits. We also ask that it encourages Registered Providers operating in Hackney to do the same.

- 5.3 On parking permits for on street parking, the Council sets an incremental pricing structure according to the emission levels of vehicles. Diesel vehicles incur an additional levy within the scheme. Electric vehicles incur a zero charge. Permit pricing to influence environmentally purchasing decisions would not be possible

⁸¹ <http://mginternet.hackney.gov.uk/mgAi.aspx?ID=27960>

⁸² <http://www.fph.org.uk/uploads/Local%20action%20to%20mitigate%20the%20health%20impacts%20of%20cars.pdf>

if parking controls were not in place. We are supportive of emissions-related charging and feel that the same principles should apply to pricing for permits on the Council's estates. We also ask that the Council works to encourage Registered Housing Providers to follow a similar approach.

Implications on air quality of current non borough wide coverage – on areas remaining uncontrolled and on routes used to get to them.

- 5.3.1 There are affects linked with the borough containing areas of uncontrolled parking which are likely to be detrimental to levels of air quality. These affects are not fully restricted to the uncontrolled areas themselves.
- 5.3.2 **Displacement and inequality.** This review heard acknowledgement from the Cabinet Member and from Officers around the detrimental impact that greater coverage would have on the lives of residents living in the fewer areas where controls were not in place. This was in terms of parking stress brought by the displacement of traffic from the now controlled areas⁸³.
- 5.3.3 A deputation recently heard at Council highlighted this, with concerns raised by local residents regarding the effects that a new scheme was having on the parking situation on surrounding uncontrolled streets⁸⁴. This included concerns around the time taken to find spaces, which as covered earlier is likely to lead to longer vehicle movement, and increased pollution.
- 5.3.4 **Commuter travel.** During the review some Members noted what they felt to be a prevalence of commuter parking activity in areas of the borough where controlled parking had not been introduced.
- 5.3.5 The Cabinet Member confirmed that a presence of uncontrolled parking increased the amount of car journeys into the borough from outside. This was in particular relation to journeys to work. We heard that uncontrolled areas were being used as 'park and ride / walk' locations for commuters coming into Hackney and moving further afield.
- 5.3.6 There is data to evidence the extent to which car is used as a method of transport to places of work in the borough.
- 5.3.7 2011 Census data estimated the Hackney workforce population (the number of people working in the area) to be 103,604. Of these, 17,438 travelled to their place of work by car or van⁸⁵.
- 5.3.8 The majority (60%) of the Hackney workforce was found to be travelling into the borough from outside. We would therefore expect high shares of the 17,438 travelling to work in Hackney by car, to be accounted for by those living outside the area. This view is also supported by the very low shares of

⁸³ <http://mginternet.hackney.gov.uk/mgAi.aspx?ID=27750>

⁸⁴ <http://mginternet.hackney.gov.uk/ieListDocuments.aspx?CId=112&MIId=3802&Ver=4>

⁸⁵ 2011 Census data drawn from Nomis

Hackney residents who use a car or van to get to work (approximately 15%)⁸⁶, and generally low levels of car ownership in the borough.

5.3.9 We deem it to be very likely that uncontrolled parking areas are currently used by significant shares of the 17,438 travelling to work through car or van. This is in particular regard to those travelling from outside of the borough who are unlikely to be ineligible for permits for any controlled parking area of the borough.

5.3.10 During the review Members also gave accounts of drivers from outside the borough using uncontrolled parking areas in the borough as 'park and ride' commuting options for their journeys further afield. This took the form of people parking in these areas before accessing the improved public transport links nearby (for example Clapton station in the north of the borough) to complete the remainder of their journey.

5.3.11 The Parking Service and the Cabinet Member confirmed that they shared concerns on this issue, in an environment where areas south of Hackney were generally covered by parking controls. They reported that the issue was exacerbated by new information tools available showing parking availability in areas, including on any uncontrolled streets.

5.3.12 We have not received evidence on the prevalence of this activity, although we have been persuaded of its existence. We are also of the view that this issue is likely to be having a detrimental impact on levels of air pollution in the borough, both in the areas where parking is taking place and on the roads forming routes to them.

5.3.13 Modelling data suggests that significant majorities of the traffic on the main roads in the borough, originate from outside of the borough⁸⁷. This highlights the need for change at a London level if levels of traffic and congestion are going to significantly reduced.

5.3.14 However, we also feel that the presence of uncontrolled parking areas of the borough which enable trips from outside of the borough to end within it, are likely to contribute in a small way to the volumes of traffic (and the air quality issues associated with them) which we see here.

Wider benefits of controlled parking schemes.

5.3.15 The evidence above demonstrates that controlled parking has a role to play in the improvement of air quality.

5.3.16 In addition to this, we have been persuaded of wider ranging benefits that schemes can deliver. This is along the same lines as the health benefits which filtered permeability can achieve by making the environment more conducive

⁸⁶ Data cited in paper to Commission - <http://mginternet.hackney.gov.uk/documents/s51963/CDM-17690659-v1A-Briefing%20Note%20on%20Air%20Quality%20in%20Hackney%20-%20Scrutiny%2017-...pdf>

⁸⁷ TfL modelling of one of Hackney's major roads (Hackney Road) estimated that 27% of traffic present on one road in Hackney originated from the borough.

to walking, cycling and physical activity generally for adults and children, and by making driving less convenient than other options.

5.3.17 We heard that the Faculty of Public Health in their guidance to local authorities recommend the introduction of more CPZs as one of the ways that local authorities should manage the impact of cars on health⁸⁸.

The Commission’s view on parking control and our support parking controls to be in place in all areas of the borough.

5.3.18 Evidence shows parking controls to help deliver reduced parking stress and end trips into an area, which will have corresponding impacts on levels of air pollution.

5.3.19 Parking controls enable the Council to take a wider set of actions recommended by external organisations in order to reduce the health impacts of cars.

5.3.20 Evidence suggests that uncontrolled areas in the borough facilitate significant levels of commuting by car and van into the borough, by both people working in Hackney and beyond. This will account for shares of air pollution in the uncontrolled areas and on the routes leading to them. As local Councillors we are fully aware of the significant dispersal and the detrimental effects of these which residents on the few remaining uncontrolled areas, are suffering from.

5.3.21 We feel that an evidence base is in place to support the borough becoming an area wholly covered by parking controls⁸⁹.

Evidence informing decisions on controlled parking

5.3.22 The Council’s Parking Enforcement Plan⁹⁰ is the document setting out the policy bases on which decisions on parking controls are made.

5.3.23 This sets out that decisions to implement controlled parking can be made according to the six factors below:

- support from public responding to a consultation (petitions are not factored into the percentage support)
- road safety
- traffic flow
- supply and demand for parking
- the environmental and air quality impacts of parking and traffic.

⁸⁸ Drawn from oral evidence given to the Commission by Lucy Saunders, Public Health Specialist – Transport & Public Realm, TfL and GLA and from – Local action to mitigate the health impact of cars publication.

⁸⁹ It is important to note that our support is for separate, zone by zone controlled parking schemes which in their totality cover the full borough. This approach would discourage journeys by car into the borough from outside, without encouraging any increases in car journeys within the area. The Commission would not support a borough wide, single zone scheme

⁹⁰ <https://www.hackney.gov.uk/pep>

5.3.24 As noted in the paper provided to the Commission by the Parking Service⁹¹, no formal weighting is applied to these factors in terms of the contribution that each make to informing final decisions.

5.3.25 However the paper provided to us and previous decisions demonstrate that in practice, responses to consultations proposing parking controls for an area play a very fundamental role in the decision to go ahead or not with them.

5.3.26 The Parking Enforcement Plan sets out that by law the Council must consider traffic management grounds before public opinion. This might play out by the Council including some roads within a scheme where there was not majority support for it, in order to be able design a final scheme informed by traffic management considerations. For example, roads might be included in order for a scheme to have clear and logical boundaries and to best discourage displaced parking.

5.3.27 However, while some roads may be ascribed as part of a zone without majority support in order to make schemes viable on an overall level, the Council will not generally deliver schemes where there is not significant support for them among the roads that were consulted with⁹².

A view that excess weight is given to consultation results in light of wider evidence of benefits (to both the area consulted and that outside of it) and response rates to consultations.

5.3.28 We feel that the weight which – in practice – is given to responses to consultations on parking controls in making decisions whether to move forward with schemes, should be revisited.

5.3.29 At present consultation results appear to play a determining role.

5.3.30 This is despite the Parking Enforcement Plan giving a mandate to the Council to implement controlled parking on a number of grounds, in addition to consultation findings.

5.3.31 With these grounds including environmental and air quality considerations and evidence available demonstrating the pollution impact of retaining uncontrolled areas of parking in the borough (both on the uncontrolled area and borough more widely), we suggest that this factor should be given a weighting that is at least proportionate as that given to consultation results drawn from the area.

⁹¹ <http://mginternet.hackney.gov.uk/documents/s53212/Paper%206%20-%20Parking%20Zone%20Implementation%20process.pdf>

⁹² A paper to the Commission - <http://mginternet.hackney.gov.uk/documents/s53212/Paper%206%20-%20Parking%20Zone%20Implementation%20process.pdf> confirmed that in no cases have the Council gone ahead with implementing a scheme where there has not been majority support on any of the roads consulted with. The Parking Service in discussions has also confirmed that while some schemes have been delivered where the streets within them have not (on a street by street basis) been supported by a majority, that this is a rare occurrence, and that most schemes have been implemented only after a majority of streets covered within it have expressed support.

5.3.32 We do note from a paper given to the Commission that the streets with uncontrolled parking fall in areas with lower pollution levels than elsewhere in the borough. However, while the uncontrolled areas (like some of the controlled areas nearby which also see lower levels of pollution) benefit from being geographically placed at further points from the city, this in no way points to parking stress and traffic related to it not contributing to the pollution levels which does exist here, nor it not having a detrimental effect on levels in other more polluted areas. That the uncontrolled streets are in areas with overall lower levels of air pollution is – in our view - despite the lack of controls being in place and not in any way because of it.

5.3.33 We also note that the Parking Enforcement Plan sets out the recommendation below. The service highlighted this recommendation as the key paragraph of the plan in regards to the grounds on which decisions to implement controlled parking would be made⁹³.

Recommendation 2.1 in the PEP 2015-2020

“A PZ (Parking Zone) will be introduced taking into account whether there is majority support, which is taken to be where the majority of respondents are in favour of the PZ. The Council may, in exceptional circumstances need to introduce a PZ without a clear majority for reasons of road safety, traffic flow, supply and demand for parking and the environmental impact of parking.

The need for a logical boundary may also result in some roads or parts of roads receiving controls without majority support.”

5.3.34 The Commission was advised that the relatively high air quality in the areas of the borough without controls meant that air quality considerations would be difficult to justify as meeting the ‘exceptional circumstances’ threshold set out in Recommendation 2.1, within which schemes may be introduced without a majority being in favour.

5.3.35 We would challenge this view. As set out above, we feel that air quality and other environmental disbenefits can be evidenced to stem from uncontrolled parking being in place in these areas. This is in relation to both the uncontrolled areas and those surrounding them. The evidence very much suggests that the relatively better air quality in the uncontrolled areas compared to some of the controlled ones, is despite the lack of controls rather than because them.

5.3.36 This and the evidence highlighting the impact of uncontrolled parking on wider areas, combined with data on the health impacts of air pollution could, we feel, be seen to meet the ‘exceptional circumstances’ criteria.

5.3.37 Our view that consultation results are given excess weighting is perhaps supported by the shares of households whose views are represented in responses. The Parking and Markets service cites response rates of 15-20%

⁹³ See text under section heading ‘Decision to implement a PZ’ on page 4 of paper submitted to Commission - <http://mginternet.hackney.gov.uk/documents/s53212/Paper%206%20-%20Parking%20Zone%20Implementation%20process.pdf>

of households as the norm for consultations seeking views towards the introduction of controls in an area⁹⁴.

Recommendation 10 - That the Council seeks to implement borough wide, zone by zone controlled parking coverage, taking account of air quality, environmental and other pertinent considerations

That the Council reassesses its view that air quality considerations may not meet the 'exceptional circumstances' threshold set out in Recommendation 2.1 of the Parking Enforcement Plan, within which controlled parking schemes may be introduced without a majority being in favour.

That the Council seeks to implement borough wide, zone by zone controlled parking coverage, taking account of air quality, environmental and other pertinent considerations.

That it does so in light of evidence showing the beneficial impacts on air pollution environmental and other pertinent factors which controlled parking can help deliver.

Content of Council consultation documents.

5.3.38 Whilst feeling that an evidence and policy base to be in place for the Council to pursue controlled parking across the borough, we do not discount the importance of consultation.

5.3.39 As with responses received from consultations around filtered permeability schemes, findings from parking consultations are used to help lead to improvements in scheme design and operational arrangements within them.

5.3.40 In addition, and again along similar lines with filtered permeability schemes, we see consultations for parking controls being a key opportunity for the Council to lay out a range of information. This is in regards to the wider environment in which the introduction new controlled parking is being considered, the benefits and any disbenefits that it will deliver, and initiatives the Council is taking to better enable active travel and also more cost effective and sustainable car use.

5.3.41 This is largely already being done and we support this. During the review we were advised that Stage 1 Consultations (consultations gauging levels of public support for the introduction of new parking controls) set out information including on the reasons for schemes, how they will work and a summary of permit types and their prices.

5.3.42 Reviewing an information sheet attached to a (at the time of writing) live consultation evidences this level of information being given. On reasoning for schemes, it covers the management of parking supply and demand and the prioritisation of space according to need (including the priority of local

⁹⁴ Drawn from Delegated report drawing on the findings of Stage 1 consultations citing 15-20% response rates as the norm for similar consultations. www.hackney.gov.uk/media/6922/Zone-Dn-Zone-E-and-Zone-N-displacement-areas-Stage-1-Delegated-Report/pdf/Delegated-Authority-Report-Zones-Dn-E-and-N-disp-areas

residents from non-local commuters), improving road safety, reducing parking stress and congestion, improving the local environment and air quality through the reduction of unnecessary car use. It explains the permit pricing structure and the setting of fees according to levels of emissions⁹⁵.

5.3.43 We only ask that the detail incorporated into the documentation is expanded to include the wider context in which controlled parking is being proposed, and the options aside from car ownership which are available to them.

Recommendation 11 - greater context being given in consultation documents for controlled parking proposals

Information documented in recent parking consultation documents show that the Council gives a range of useful and insightful information. We ask that this is built on to also include:

- That road transport is shown to be the key current cause of air pollution in Hackney (backed up by a statistical example such as one submitted to the Commission showing the high shares of pollution that road transport accounts for).
- The challenge that the borough is facing in terms of managing growth. Using statistics around recent and expected population growth in Hackney and London to highlight this.
- How these schemes are one of the ways that the Council is trying to facilitate clean and green travel to and through the borough in a context of growth in surrounding areas.
- Details of the options that are open to people wishing to continue driving in way which does not require a permit (in particular information on car club options), and details of other non-car travel options (cycle loan scheme).

5.4 Communications with residents on air quality issues

The need for communications.

5.4.1 Evidence suggests that local authorities have a key role in communicating with residents on air pollution.

5.4.2 This is with regards to giving warnings and advice when levels are particularly high, information on the health effects of exposure and how this can be reduced, the causes, and the changes needed to help to address it.

5.4.3 The IPPR's Lethal and Illegal - London's air pollution crisis report⁹⁶ sets out the steps and policy changes needed at European, national and London level in order for pollution to be tackled. However, the co-author of the report giving

⁹⁵ Drawn from information in Zone L Displacement (South Homerton) –

www.consultation.hackney.gov.uk/parking-services/zone-l-disp/supporting_documents/HDS2393%20Zone%20L%20displacement_12pp%20X%20A42_WE_B.pdf

⁹⁶ www.ippr.org/publications/lethal-and-illegal-londons-air-pollution-crisis

evidence to the Commission said that local authorities had key roles in helping to persuade residents of the need for wider change.

- 5.4.4 We heard that while there had been an increase in the awareness of the issue and transport (and within this diesel engines) being a key cause, communications messages needed to continue, and would need to progress to ones where it was made clear that all petrol vehicles were causing unacceptably high levels of health issues⁹⁷⁹⁸.
- 5.4.5 The need for communications by local authorities is reflected in a range of guidance material for local authorities. Draft guidance by the National Institute for Health and Care Excellence (NICE) recommends that consideration is given to how awareness can be raised among residents, businesses, and at risk groups.⁹⁹ Recent guidance produced by Public Health Registrars in London also highlights the need for communications by local authorities, and states that Public Health professionals are well placed to carry out a role which raises awareness. They signpost to a tool kit produced by Defra which can be used to aid this¹⁰⁰.
- 5.4.6 During the evidence sessions for this review, the Council's Director of Public Health also agreed on the need for this work, and felt that these should be focused on how people could best avoid exposure to air pollution, how they should respond when pollution reached particularly high levels (particularly those with existing respiratory problems), and also on improving awareness around the causes.¹⁰¹
- 5.4.7 The topic areas that we have covered in this report – around the use of filtered permeability schemes and controlled parking zones – are ones which partly involve encouraging behaviour change by our residents. From this review and from our roles as local Councillors, we are aware that very polarised views exist towards them. We see communications as a vital step towards helping to explain our reasoning for supporting schemes and to help persuade more residents that they are needed.

Current communications by the Council

- 5.4.8 In terms of alerting people to air pollution we support the Council's promotion of airTEXT. This is a service which provides (those signed up) warnings and advice if air pollution in people's areas are expected to reach moderate, high

⁹⁷ It should be noted that the IPPR also saw the need for direct action on a local level. They gave support for the range of measures already being taken in Hackney and said that pollution levels on a Hackney and London level would further benefit from other boroughs following these approaches. The Commission welcomes this external validation of the approaches of the Council and the recognition that these are at the forefront of other areas.

⁹⁸ <http://mginternet.hackney.gov.uk/mgAi.aspx?ID=27130>

⁹⁹ Air pollution: outdoor air quality and health NICE guideline, Draft for consultation, December 2016 - www.nice.org.uk/guidance/GID-PHG92/documents/draft-guideline

¹⁰⁰ Air pollution: a threat to everyone's health, yet a threat everyone can help to address, May van Schalkwyk and Emera O'Connell

¹⁰¹ <http://mginternet.hackney.gov.uk/mgAi.aspx?ID=27959>

or very high levels. The Council works to promote the service to those groups who are most vulnerable to the harmful effects of air pollution.

5.4.9 This service is now complemented by the London Mayor's introduction of a system of issuing air quality alerts at bus stops, tube stations and roadsides in instances when pollution levels are particularly high. This was enacted for the first time in December 2016.

5.4.10 The Council also directly communicates and promotes the range of its initiatives which are relevant to the air quality agenda. For example, this has included advertising its exercise programmes, the Low Emissions Neighborhoods project and the electrical vehicle charging infrastructure which has been made available. They also promote healthy activities which are linked, for example cycling and walking.

5.4.11 However, we do see the need for a wider communications activity dedicated specifically to air pollution. We feel that this could better create an environment which enables residents to make positive choices and to be more informed of the reasoning for the Council's approaches (for example around supporting filtered permeability and controlled parking schemes). This is in addition to better preparing residents for London wide initiatives such as the introduction of the Ultra Low Emissions Zone.

5.4.12 Officers from the Communications and the Public Health areas confirmed that there had not been any dedicated campaigns or communications in this area.

5.4.13 We feel that there should be an overarching approach in place, and that this should be defined as one of the actions that the Council is taking to address air pollution issues.

Recommendation 12 – That the Council develops and maintains an Air Quality Communications Plan and includes this as a dedicated action within the Council's Air Quality Action Plan.

We ask that Public Health in conjunction with the Communications and Consultation service leads on developing a plan to increase public awareness of air pollution. This is with regard to the high levels of air pollution, the harm that it does, its causes, the actions that the Council is taking to respond to it and how these will help, and how residents and businesses can contribute towards achieving better air quality.

We ask that this action is named in the Council's Air Quality Action Plan as one of the measures being taken to address pollution in the borough.

5.5 Planning and air pollution considerations made in new developments

5.5.1 Through its adherence to national and regional policy and guidance and the establishment of extensive policy at a local level, the Council operates within a

framework enabling air quality considerations to play a significant role in planning decisions¹⁰².

- 5.5.2 National legislation sets air quality as a material consideration within planning applications. It requires Local Plans to address the issue.
- 5.5.3 On a regional level, the London Plan sets out how development proposals should not lead to further deteriorations of air quality.
- 5.5.4 The Council also has a range of relevant policies on a local level. Its Core Strategy and Development Management Local Plan set out policies and principles around development not adversely impacting on air pollution levels. It states the need for good design to reduce emissions and improve energy efficiency, and for developments to promote and enable sustainable transport.
- 5.5.5 The developing wider planning policy environment in which it is operating may enable it to go even further in the standards it demands; the new London Mayor has set out a direction (to be expanded upon as existing strategies are reviewed) of going further, with a requirement for new buildings to be air quality positive contributing to a reductions in emissions in London.
- 5.5.6 The Council is also developing a new Local Plan, which will form the key document to direct development in the borough up to 2033. This is being shaped around a theme of rapid population growth the borough; up by over 30% since 2001, and predicted to rise to 317,000 people from the current 269,000 by 2033. This brings a need for new homes in an already densely populated area; the equivalent of 1,758 additional units per annum. It brings the need for more services, facilities and economic opportunities.
- 5.5.7 We heard that policies emerging in the plan will include steps to further reduce emissions during construction periods and to use more sustainable technologies to reduce emissions over time.
- 5.5.8 Current arrangements through which the Council ensures that that air quality considerations play a full part in planning decisions involve dialogue between two service areas of the Council. Within this, the Environment and Waste Strategy Service reviews planning applications from an air quality objective, and gives any advice and recommendations to the Planning Service. This regards whether applications should – on air quality grounds – be accepted or refused, or accepted subject to particular conditions being attached.
- 5.5.9 From discussions with representatives from both services, we reached a view that there was room for greater collaboration between the two.
- 5.5.10 The service giving advice felt that – while the policy apparatus was in place allow for air quality factors to be given a considerable weighting in planning decisions – the extent to which this fed through into final determinations (either

¹⁰² Drawn from presentation given to Commission - <http://mginternet.hackney.gov.uk/documents/s54223/Air%20Quality%20Slidesv3.pdf>

in terms of applications being refused or conditions being applied to approvals). Planning Officers have challenged this view.

5.5.11 We appreciate that the Planning Service needs to consider a wide range of factors in the decisions that it reaches. Air Quality is one of these along with a range of others. We also appreciate that the extent to which they are able to act on advice to refuse applications or to apply conditions to them will depend on its judgement of whether these would be reasonably upheld in the event of an appeal.

5.5.12 However, the dialogue with the services did suggest that levels of collaboration could be improved. This would better ensure that recommendations and advice around air quality considerations is ambitious but also securable. It would better enable challenge to the service in cases where recommendations and advice have not been reflected in determinations.

5.5.13 The services appear to have agreed with the need for improvement.

5.5.14 A paper provided to us that there has been collaborative work towards improving the effectiveness and efficiency of how air quality matters are secured within planning applications. The paper lists a set of conditions relevant to air quality which can be applied to planning permissions of particular development / application types. We understand that this list of conditions has been produced to better enable officers to have ease of access to details on what sort of conditions can be reasonably secured on applications.

5.5.15 The paper also states that further actions are planned, including joint training ventures and updating documentation to secure key information early in the development process.

5.5.16 We support this work, although we are keen to explore its impact. We ask that an update is given to the Commission on the progress made.

Recommendation 13 – That the Commission receives an update from the Environment and Waste Strategy and Planning Services on their work to improve joint arrangements ensuring air quality considerations play a full part in planning decisions, and its impact.

Current arrangements through which the Council ensures that that air quality considerations play a full part in planning decisions involve dialogue between two service areas of the Council. Within this, the Environment and Waste Strategy Service reviews planning applications from an air quality objective. Advice and recommendations are then given as to whether applications should – on air quality grounds – be accepted or refused, or accepted subject to particular conditions being attached.

From discussions with representatives from both services, we reached a view that there was room for greater collaboration between the two. This would better ensure that the advice provided around air quality related conditions which should be applied

to applications is ambitious but also securable. It would also better enable challenge to the Planning Service in any cases where recommendations and advice have not been reflected in determinations.

The services appear agree on there being a need for improvement and as a result of our review have instigated joint work to improve the effectiveness and efficiency of how air quality matters are secured within planning applications.

We support this work, although we are keen to explore its impact.

We ask that an update is given to the Commission on the progress made.

5.6 National and London level change

5.6.1 This review has been predominantly focused on areas on which the Council has a direct role to play.

5.6.2 However, it is also clear that while local actions can help contribute to tackling air quality, substantial progress will only be made through action on a national and local level.

5.6.3 This is supported by a range of evidence.

5.6.4 Modelling suggests that significant shares of harmful pollution in the borough is generated from outside the area¹⁰³.

5.6.5 In terms of the emissions generated from transport (the key contributor to air pollution) which are generated inside the borough, evidence points to the majorities of vehicles emitting them coming from outside the area. Congestion is getting worse in Hackney in a context where rates and counts of car ownership have fallen.

5.6.6 Delivering filtered permeability schemes helping to encourage other travel options and reducing the scope for trip-ends through parking restraint will help address the issue. However, it will not deliver the sea changes needed.

5.6.7 Significant change will only be achieved through London wide and national action to reduce traffic and the use of the most polluting vehicles in particular.

5.6.8 This was part of our reasoning to gaining contributions to the review by the GLA and by DEFRA. This also came after the Commission held discussions with one of the co-author's of the IPPR's Lethal and Illegal Report. The work sets out the extent and key causes of air pollution in London, and the steps which would (evidenced by modelling) reduce air pollution to acceptable and lawful levels. It makes recommendations for policy changes at the European, national and London. These discussions have helped us reach a view towards the current proposals by the London Mayor and National Government.

Approaches at a London Level

¹⁰³ Modelling by the Council suggests the majority of particulate matter (PM10 and PM2.5) in the borough is generated from outside.

- 5.6.9 At the point of this review starting, the London Mayor was consulting on a set of proposals to improve air quality.
- 5.6.10 With this consultation now having ended, the Mayor has announced that he will be going ahead with the introduction of an Emissions Surcharge (also known as the T-Charge). This – from the 23rd October 2017 – will require cars, vans, minibuses and heavy vehicles driving in the current congestion charge zone in Central London (between 7am and 10pm) not meeting minimum emissions standards to pay a £10 daily charge in addition to the Congestion Charge.
- 5.6.11 The consultation also sought views on how the the Ultra Low Emission Zone (ULEZ) decided upon by the previous London Mayor, might be improved. Under the current arrangements, this was set to come into effect at the end of 2020. Operating 24 hours a day 7 days a week, the scheme would involve vehicles not meeting minimum emissions standards paying a charge to enter the congestion charge zone, in addition to the congestion charge.
- 5.6.12 The new Mayor sought views around bringing implementation forward to 2019, for the scheme to cover a greater area (extending to the Central London up to the North and South Circular roads), and for emissions standards to be strengthened.
- 5.6.13 Following the consultation, the Mayor has now announced his intention to go ahead with the bringing forward of the scheme to the 8th April 2019. This will involve the most polluting cars, vans and motorbikes having to pay £12.50 to drive through (residents living within the zone will be exempt until 2022) central London, while buses, coaches and HGVs will pay £100. Emissions standards will be strengthened from those set out by the previous Mayor with standards being set on particulate matter emissions for diesel vehicles¹⁰⁴.
- 5.6.14 This said, in terms of the area coverage, April 2019 will see the ULEZ implemented in the current congestion zone and not more widely. The Mayor has set down an intention to consult at later stages on the extension of the zone to nearly all of Greater London for heavy diesel vehicles from 2020, and to the North and South Circular Roads for light vehicles from 2021.
- 5.6.15 We are supportive of the intention to bring forward implementation of the ULEZ. We are also supportive of the actions to better protect people from the harm of diesel vehicles through the setting of standards on particulate matter in addition to those on nitrous oxide.¹⁰⁵
- 5.6.16 However, we are disappointed that the ULEZ will not in the first instance be brought to a wider area than the current congestion zone. We look forward to

¹⁰⁴ <https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-2>. These proposals are now subject to statutory consultation.

¹⁰⁵ The ULEZ scheme approved by the previous Mayor set emission standards for diesel vehicles to meet Euro 6/VI NOx emissions. However, there are up to 430 vehicles registered in London that meet Euro 6 diesel standards for NOx but emit up to six times the Euro 6 standard for PM.

the release of future consultations on expansions. On this point, we feel that consultations should seek views on widening coverage beyond the North and South Circulars for lighter vehicles in addition to heavier ones. We would be supportive of a scheme covering London as a whole.

Recommendation 14 – That the Council lobby the Mayor of London for the ULEZ to cover all of London for both heavy and light vehicles.

Views on banning diesel

5.6.17 While the Mayor of London has announced a range of measures to help improve air quality through transport initiatives, we note the move by the Mayors of Paris, Mexico City, Madrid and Athens to deliver full bans of diesel vehicles by 2025.

5.6.18 We appreciate the arguments against London following its current approach rather than matching the announcements of these cities.

5.6.19 There is currently little detail around how the changes announced will be funded and operated, and around any exemptions which may be necessary. We also note that these schemes are for implementation in 2025 compared to the London Mayor taking steps beginning in 2017 (with the Emissions Surcharge) which will work to restrict the flow of the most polluting vehicles (including older diesels) into the capital. We also note that the newer diesel vehicles meeting emissions standards set by the ULEZ are cleaner than the older vehicles not meeting these. The approach of the ULEZ means less of a blanket approach.

5.6.20 However, we still feel that the setting out of an approach to incrementally phase out the use of diesel vehicles in London is warranted.

5.6.21 Diesel vehicles account for around 40% of both NO_x and PM₁₀ emissions in London¹⁰⁶. Emerging research continues to question the extent to which testing conditions in which emissions standards are measured mask the true emissions which will be expended on the road¹⁰⁷.

5.6.22 We feel that this incremental approach could start with the current plans to insist on Euro 6 standards for diesel cars within the new ULEZ (extending the reach of the zone would also feed into this). However, we feel there should at this point be a further announcements at this point and with timings attached on intentions to make these vehicles eligible for charging within the ULEZ arrangements, moving to a full ban on diesel vehicles.

Recommendation 15 – That the Council lobby the Mayor of London for establishing an incremental approach to ban diesel vehicles in London.

¹⁰⁶ www.ippr.org/publications/lethal-and-illegal-londons-air-pollution-crisis

¹⁰⁷ Research by the [Emissions Analytics](#) found a number of manufacturers to have delivered models in 2016 with NO_x emissions that are far higher than the official lab-based test when driven in real-world conditions.

Road Pricing

5.6.23 We support calls from this Council¹⁰⁸, the IPPR and the London Assembly's Transport Committee (among others) for greater use of road pricing.

5.6.24 The Central London Congestion Charge introduced in 2003 charges vehicles a defined charge for entering a zone of central London within a defined time range of the day.

5.6.25 However, with this charging not taking into account the distances travelled within the zone and the extent of usage of the most congested areas at the most congested times, it is somewhat of a blunt instrument.

5.6.26 We see the need for the design of infrastructure to facilitate the new ULEZ arrangements as an opportunity to explore the potential for a road pricing scheme to operate alongside it, as a replacement of the now dated Congestion Charge.

Recommendation 16 – That the Council lobbies the Mayor of London for establishing a road pricing scheme as a replacement for the current Central London Congestion Charge

Approaches at a National Level

5.6.27 At a national level the action taken to tackle air pollution is strongly lacking. The Hackney-based Client Earth¹⁰⁹ has been instrumental in shining a light on this.

5.6.28 On a number of occasions, ClientEarth has brought legal proceedings challenging the government's approach to the discharge of its duties in relation to air quality. Most recently, ClientEarth secured an Order from the Supreme Court requiring that the government publish its draft Air Quality Plan after the recent local elections. It is understood¹¹⁰, that ClientEarth intends to issue legal proceedings challenging the approach taken by the government in its draft Air Quality Plan (which was published on 9 May 2017) and the subsequent consultation.

5.6.29 Initial viewing of these plans suggests that they are vague and non-committal. They do not commit to two practical steps which would enable more tackling of the issue.

5.6.30 A range of commentators – including the IPPR and the London Mayor - have called for a diesel scrappage scheme. This is in order to facilitate the removal of the most polluting vehicles from the roads whilst not penalising those who bought them in response to government advice and incentives (through

¹⁰⁸ The Cabinet Member for Neighbourhoods, Transport and Parks confirmed that the Council in its Transport Strategy was supportive in principle of a move to London wide road pricing.

¹⁰⁹ www.clientearth.org

¹¹⁰ <https://www.clientearth.org/clientearth-challenges-uk-governments-air-pollution-consultation/>

vehicle excise duty and company car tax) for diesel vehicles to be chosen over petrol alternatives. The proposals do not commit to this.

5.6.31 The IPPR also evidences the need for vehicle excise duty to be devolved to the London level. We note evidence from the GLA suggesting that none of the £500 million raised yearly in London from this source is invested in the road network in the capital¹¹¹. We have also heard that nationally-set charging structures for excise duty do not go far enough in incentivising moves away from polluting vehicles. We feel that a transfer of duties to the GLA could enable the extent to which differential pricing is applied according to vehicle emissions, to be partly informed by discussions with local people.

Recommendation 17 – That the Council lobbies Central Government to introduce a diesel scrappage scheme and to devolve excise duty for London to the GLA.

6. CONCLUSION

- 6.1. As an inner London borough, Hackney is suffering from high and often illegal levels of air pollution.
- 6.2. Road transport is currently the key cause, and we are supportive of the broad range of work by the Council to affect change locally. This includes initiatives to limit the number of additional motorised vehicles which new development might otherwise bring, work with businesses to reduce their transport-related emissions, and the delivery of continued improvements to cycling infrastructure. There are many others.
- 6.3. Our review explored two topics around transport on a local level – filtered permeability and parking controls.
- 6.4. On filtered permeability, we found that when delivered in areas like Hackney, schemes are likely to reduce (or – in the context of growth – at least help contain increases in) traffic and therefore bring air quality benefits. They are likely to deliver wider benefits in addition. We support the Council using filtered permeability as part of a range of measures to help reduce avoidable car use and to better facilitate other transport options.
- 6.5. This said, there are disbenefits also. We heard first-hand accounts of the impact that these can have, and we support the work of the Council to continue dialogue with those affected.
- 6.6. On parking controls, evidence suggests that rationing parking availability can have significant impacts on air pollution levels. Parking stress has fallen in the areas in which controls have been introduced. This indicates a removal of some of the vehicles (and their emissions) previously accessing the area, and a reduction in the emissions expended by cars continuing to access it but

¹¹¹ <http://www.ippr.org/files/publications/pdf/lethal-and-illegal-solving-londons-air-pollution-crisis-Nov2016.pdf>

spending less time searching for a space. Parking controls can also enable further progressive measures to incentivise the purchasing of lower emission vehicles over higher emitting ones, and to minimise the increase in vehicles which new development will otherwise bring. They also bring a wider range of health related benefits.

- 6.7. The introduction of parking controls brings air quality benefits to beyond the immediate area. This is through lessening the facilitation of journeys by car into and within the borough, and by lowering pollution levels on the routes leading to previously uncontrolled areas.
- 6.8. The caveat to parking controls bringing wider benefits, are the disbenefits felt by residents living in uncontrolled areas experience when controls are brought to areas nearby. Bringing controlled parking to these areas would address this, while delivering further air quality benefits to the borough generally.
- 6.9. We feel that an evidence base is in place to support the borough becoming an area wholly covered by parking controls. We challenge points made to the Commission around current policies not allowing for this, and urge the Council to pursue it.
- 6.10. In addition to transport-related topics, we explored two other Council-managed areas – around how it communicates to residents on air pollution, and, in a Planning context, how it ensures that air quality considerations play a full part in the planning process.
- 6.11. On Communications, a wide range of evidence and guidance highlights a key role for local authorities in communicating with residents on air pollution. However, while the Council works to promote an alerting service, and also carries out communications on a wide range of initiatives relevant to the air quality agenda, there is no overarching approach in place.
- 6.12. We see the need for a wider communications activity dedicated specifically to air pollution. We feel that this could better create an environment which enables residents to make positive choices and to be more informed of the reasoning for the Council's approaches (for example around supporting filtered permeability and controlled parking schemes). This is in addition to better preparing residents for London wide initiatives such as the introduction of the Ultra Low Emissions Zone.
- 6.13. Regarding Planning, national, regional and local policy gives the Council a framework enabling air quality considerations to play a significant role in planning decisions¹¹². The further-developing London and local planning policy environment may soon enable it to go even further in the standards it demands.

¹¹² Drawn from presentation given to Commission - <http://mginternet.hackney.gov.uk/documents/s54223/Air%20Quality%20Slidesv3.pdf>

- 6.14. Current arrangements through which the Council ensures that that air quality considerations play a full part in planning decisions involves dialogue between two service areas of the Council. It has been identified that there is room for greater collaboration and closer working between these services. This will better ensure that recommendations and advice around air quality considerations are ambitious whilst also securable. It will better enable challenge to the Planning service in any cases where recommendations and advice provided by those with air pollution expertise has not been reflected in determinations. We welcome the work which has been instigated by the services as a result of our review, and we look forward to further updates on this.
- 6.15. Our review makes a number of recommendations for change at a local level. However, without transport related action on a London and national level substantial progress will not be made.
- 6.16. This Commission supports the action by the London Mayor in confirming the introduction of an Emissions Surcharge and announcing an intention to go ahead with the bringing forward of the Ultra Low Emission Zone (ULEZ) scheme to the 8th April 2019.
- 6.17. However, we would like to see him go further.
- 6.18. We would like the reach of the ULEZ to be extended, at an earlier point.
- 6.19. Our review was set in a context of a number of European cities announcing plans to deliver full bans of diesel vehicles by 2025. While appreciating the arguments for London following its current approach rather than matching the announcements of others, we still call for the setting out of an approach to incrementally phase out the use of diesel vehicles in London.
- 6.20. As a final note on the need for change at a London level, we support calls for greater use of road pricing. The Central London Congestion Charge is somewhat of a blunt, and now dated, instrument. We see the design of infrastructure to facilitate the new ULEZ arrangements as an opportunity to explore the potential for a road pricing scheme to operate alongside it. This would help tackle traffic by basing charges on distances travelled within the zone and the extent of usage of the most congested areas at the most congested times.
- 6.21. At a national level, the lack of action is more concerning. Court cases brought by a Hackney based group have shown the Government to be ignoring their responsibilities to deal with the air pollution issues. Plans they were forced to make to do so were then shown to be illegally poor. Guidance released in response to that finding appear on first reading to be vague.
- 6.22. We call for two opening coherent points of action.
- 6.23. Government should fund a diesel scrappage scheme to facilitate the removal of the most polluting vehicles from the roads without penalising those who

bought them in response to government advice and incentives. They should also

- 6.24. They should also devolve vehicle excise duty to the London level. This is in order to greater support cleaner transport initiatives in the capital and for the extent of differential pricing applied according to vehicle emissions to be decided at a local level.

7. CONTRIBUTORS, MEETINGS AND SITE VISITS

The review's dedicated webpage includes links to the terms of reference, findings, final report and Executive response (once agreed). This can be found at www.hackney.gov.uk/air-quality-review

Meetings of the Commission

The following people gave evidence at Commission meetings or attended to contribute to the discussion panels.

17th November, 2016¹¹³ -

External Guests:

- Laurie Laybourn-Langton, Research Fellow, IPPR

From Hackney Council:

- Councillor Feryal Demirci, Cabinet Member for Neighbourhoods, Transport and Parks
- Paul Bowker, Group Engineer Networks and Transportation
- Mark Griffin, Head of Environment and Waste Strategy
- Robert Tyler, Principal Pollution Control Officer
- Laura White, Sustainable Transport Planner

9th January, 2017¹¹⁴

External Guests:

- Brian Deegan, Principal Technical Specialist, TfL
- Lucy Saunders, Public Health Specialist, Transport and Public Realm, Greater London Authority (GLA) and TfL

From Hackney Council:

- Councillor Feryal Demirci, Cabinet Member for Neighbourhoods, Transport and Parks
- Seamus Adams, Head of Parking, Markets & Street Trading
- Andrew Cunningham, Head of Street Scene
- Robert Tyler, Principal Pollution Control Officer
- Laura White (Sustainable Transport Planner)

20th March, 2017

From Hackney Council:

- Dr Penny Bevan, Director of Public Health

¹¹³ <http://mginternet.hackney.gov.uk/ieListDocuments.aspx?CId=119&MIId=3749&Ver=4>

¹¹⁴ <http://mginternet.hackney.gov.uk/ieListDocuments.aspx?CId=119&MIId=3751&Ver=4>

- Steve Fraser-Lim, Senior Planning Officer
- Joe Sheeran, Strategic Communications Adviser
- Jacob Tong,
- Keung Tsang, Regeneration & Planning Policy Officer
- Robert Tyler, Principal Pollution Control Officer

Focus Groups

Part of the evidence gathering for this review involved the Commission holding focus group sessions with samples of residents who had been affected by a recent filtered permeability scheme introduced in their local area. One was held with a group who were supportive of the changes and one with those who were against.

The written records of this discussion are available in Appendix 1 of this report.

8. MEMBERS OF THE SCRUTINY COMMISSION

- Councillor Sharon Patrick (Chair)
- Councillor Will Brett (Vice Chair)
- Councillor Kam Adams
- Councillor Michelle Gregory
- Councillor Ian Rathbone
- Councillor Vincent Stops

Overview and Scrutiny Officer: Tom Thorn ☎ 020 8356 8186

Legal Comments: Benita Edwards ☎ 020 8356 3126

Financial Comments: Deirdre Worrell ☎ 020 8356 7350

Lead Group Director: Kim Wright ☎ 020 8356 7290

Relevant Cabinet Member: Councillor Feryal Demirci ☎ 020 8356 3270

9. FURTHER READING

9.1 The agenda for the Commission meetings on [17th November 2016](#), [9th January 2017](#), [8th February 2017](#) and [20th March 2017](#) on the Hackney Council website contain minutes of the evidence session and background briefings/papers submitted.

9.2 The following documents have also been relied upon in the research

National

- *Government Consultation, Improving air quality: reducing nitrogen dioxide in our towns and cities, DEFRA, May 2017 - www.gov.uk/government/consultations/improving-air-quality-reducing-nitrogen-dioxide-in-our-towns-and-cities*
- *Air pollution: a threat to everyone's health, yet a threat everyone can help to address, May van Schalkwyk and Emera O'Connell, Public Health Registrars, 2017*

- *Lethal and illegal: Solving London's air pollution crisis*, Laurie Laybourn-Langton, Harry Quilter-Pinner and Helen Ho, IPPR, November 2016 - www.ippr.org/publications/lethal-and-illegal-solving-londons-air-pollution-crisis
- *Local action to mitigate the health impact of cars*, Katie Hunter and Lucy Saunders, UK Faculty of Public Health, July 2016
www.fph.org.uk/uploads/Briefing%20statement%20-%20Impact%20of%20cars.pdf
- *Air pollution: outdoor air quality and health NICE guideline, Draft for consultation*, December 2016 - www.nice.org.uk/guidance/GID-PHG92/documents/draft-guideline
- *Disappearing traffic? The story so far*, Cairns, S; Atkins, S; Goodwin, P, UCL, 2002
<http://discovery.ucl.ac.uk/117869/>

Local / sub regional

- *London stalling - Reducing traffic congestion in London*, London Assembly Transport Committee, 2017
- *Cycle Superhighway 1: Motor traffic reduction scheme for the Wordsworth Road area (Hackney)*, Consultation Report, TfL, July 2016
https://consultations.tfl.gov.uk/cycling/cs1-wordsworth-road/user_uploads/cs1-wordsworth-consultation-report-final.pdf
- *Cycle Superhighway 1: Motor traffic reduction scheme for the De Beauvoir Road area (Hackney)*, Consultation Report, TfL, July 2016
- https://consultations.tfl.gov.uk/cycling/cs1-de-beauvoir/user_uploads/cs1-de-beauvoir-consultation-report.pdf
- *Proposals to improve air quality, Report to the Mayor on consultation*, TfL consultation, February 2017
https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-two/user_uploads/report-to-mayor---final.pdf-1
- *Have your say on changes to the central London Ultra Low Emission Zone*, TfL consultation, April 2017
<https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-2>
- *Local Plan 2033 (LP33), A New Local Plan for the Borough*, Hackney Council, 2016
http://mginternet.hackney.gov.uk/documents/s50202/CDM-17156409-v1-Appendix_1_LP33_21_6_16_Final.pdf
- *London Fields Traffic Management Research Report*, Hackney Council and BDRC Continental, 2016
<https://consultation.hackney.gov.uk/streetscene/london-fields-middleton-road-traffic-management-sc/results/london-fields-consultation-report.pdf>

- *Hackney transport strategy 2015-2025, Hackney Council, November 2015*
<https://www.hackney.gov.uk/transport-strategy>
- *Air quality action plan 2015-19, Hackney Council, 2015*
www.hackney.gov.uk/media/3054/draft-air-quality-action-plan-2015-19/pdf/Draft-air-quality-action-plan

Appendix 1

Notes of focus group discussions on road closure and filtered permeability schemes.

13th March 2017

Members in attendance:

Cllr Sharon Patrick (Chair), Cllr Vincent Stops, Cllr Michelle Gregory

Introduction and format of discussion

Two separate focus group discussions were held by the Commission. Both were with residents who had been affected by the motor traffic reduction scheme delivered in the Wordsworth Road area as part of the Cycle Superhighway Route 1 (CS1).

The first discussion was attended by two residents who were against the changes, and who had reported being adversely affected by them.

The second was attended by four residents who saw the effects to have been positive.

Both groups were asked the same set of open questions while also being invited to make any further comments. These are available for reference at the bottom of the paper.

The unequal balance in terms of the numbers attending each session was unfortunate; this was partly down to one resident planning to attend the first session later finding that they were not able to. This resident's written submission which we are grateful for has been incorporated into this analysis.

It should be noted that the residents reporting detrimental impacts had not had their roads closed to through motor traffic, whilst the residents seeing the changes as positive lived on roads which had been made access only for motor vehicles.

Format of document

This single document covers both discussions. It is separated into 4 themes emerging from the discussions, with subsections within each of these.

1. Awareness of objectives and wider context

Awareness that the scheme related to CS1

Both groups were aware that the scheme was related to the CS1 initiative, and that initial plans to change access to one road had been expanded to include more.

Awareness of objectives

Both groups saw the scheme in Wordsworth as having been intended to reduce traffic (in particular rat running) and car use generally, and to make roads more conducive to safe cycling.

Both groups said that schemes were associated with aiming to make journeys to schools safer and more pleasant for parents and children. One said that they had an aim of reducing pollution in roads around schools.

A resident in favour of the scheme felt that it fitted in with general aims around being a greener borough.

On what she felt were the broader aims of the scheme – to reduce cars and to make cycling and walking safer - a resident said that she had only heard this as a result of her networks in the local community and not through information given to her by the Council or TfL as a local resident. She said that she was supportive of these aims, but that the scheme had failed to deliver this in her area, and had worked to make things more unsafe.

Despite being engaged with the topic of road closures and filtered permeability, neither group had been made aware of the context in which the Council was delivering these initiatives. They had not been made aware of the population and employment growth factors in Hackney, London and the South East which was further driving the need to encourage vehicles away from areas and to facilitate alternatives. There was not an awareness either of the range of initiatives which were being delivered alongside them; greater availability of car club vehicles, encouraging cleaner vehicle types, and reducing commuting by car for example.

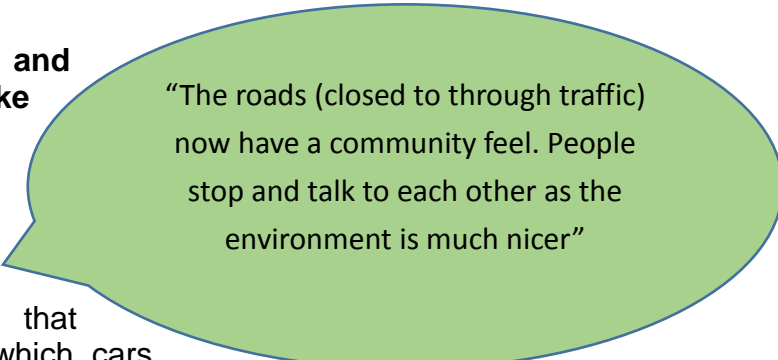
2. Benefits, Disbenefits and Personal Impact

We heard very powerful accounts of the advantages that the scheme had delivered for some residents, and also very concerning accounts of the negative impact that others had seen.

2.1 Benefits

Safer for active forms of travel, and encouraging residents to take alternatives to cars

We heard that cycling had been made safer as a result of the changes. One resident said that the move to close a number of streets to through traffic meant that there were less points through which cars crossed the Cycle Superhighway. Parents found that trips to and from schools were easier, safer and more pleasant.



“The roads (closed to through traffic) now have a community feel. People stop and talk to each other as the environment is much nicer”

One resident living on a street closed to through traffic had seen more people walking than previously. Another felt that there had been a marked reduction in heavy traffic in the area generally.

Cleaner and quieter

The streets closed to through traffic felt cleaner and safer. There was a sense that public space had been retaken by residents.

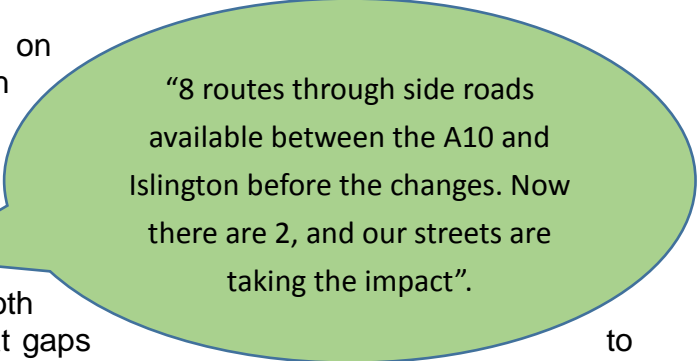
We heard of the individual-level benefits felt by some residents living on roads which had been closed. Residents could leave their windows open at night without being woken by traffic and horns. Two said that they could hear birdsong in the morning for the first time for years. One said that he was now able to work at home without constant noise disruption.

2.2 Disbenefits

Dispersal onto residential roads – creating safety issues, anti-social behaviour and pollution

Residents living on two roads local to those closed to through traffic – Walford Road and Brighton Road – described significant dispersal from the scheme.

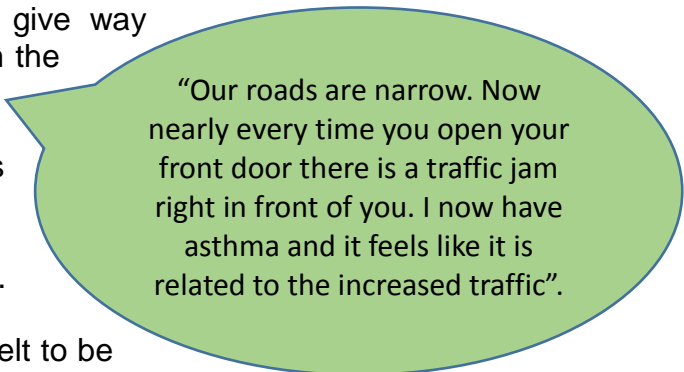
The issues which had been resolved on streets that had been closed to through traffic had become more pronounced on those remaining open.



“8 routes through side roads available between the A10 and Islington before the changes. Now there are 2, and our streets are taking the impact”.

Dispersal was having an impact on driver behaviour. Both roads were narrow with cars parked on both sides. The added congestion meant that gaps to get through were fewer and drivers sought to make the most of opportunities by speeding through. Passing places were inadequately sized and spread. Pedestrians and cyclists were having difficulty navigating streets in this setting.

Stand offs between drivers not willing to give way were common, with residents suffering from the resulting car horn noise and other anti-social behaviour. Motorcyclists unable to squeeze through traffic on the roads mounted pavements.



“Our roads are narrow. Now nearly every time you open your front door there is a traffic jam right in front of you. I now have asthma and it feels like it is related to the increased traffic”.

A residents often witnessed minor accidents.

The roads which had remained open were felt to be suffering from higher pollution levels.

Disbenefits were expected to continue

When asked, residents who were against the schemes said that they did not feel the volume of dispersed traffic on their roads to have reduced since the scheme was first implemented. They felt that in many cases drivers continued to look for cut-throughs rather than to use main roads. The traffic included work vans (including HGVs), minicabs and school vehicles. Both groups said that with satellite navigation systems directing drivers down the route which would be quickest at any one time, this issue would continue if changes were not made.

There was scepticism among residents against the scheme that it would lead to less car usage.

Disbenefits were a source of inequality

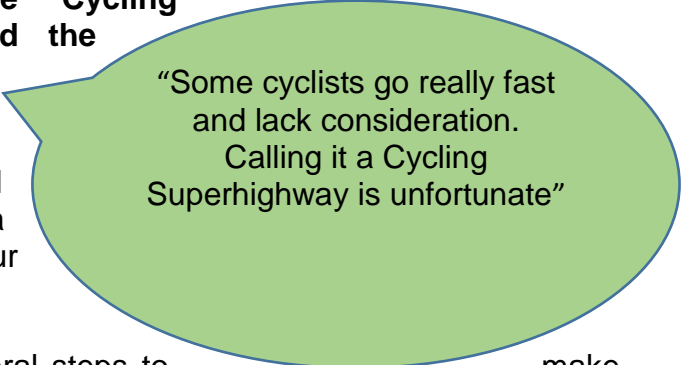
A resident said that she felt that the way the scheme had been designed had created a polarised set of experiences. The 6 roads which had been changed were now quieter and nicer places. However, closing so many and leaving only 2 open meant that those remaining had suffered very heavy consequences. She said that closing fewer roads would have been a fairer approach. Walford Road and Brighton Road

had high levels of pollution and traffic flow before the changes which were similar to the largest of the closed roads, and this had now got worse.

The same resident pointed out that the more major roads where traffic was encouraged onto – the A10 and Crossway – had high densities of social housing and already had high levels of pollution in advance of the changes. The impact of the scheme would therefore be felt disproportionately by lower income groups.

Some cyclists not using the Cycling Superhighway responsibly – and the name not conducive to encouraging this

A common issue identified by both those in favour of the scheme and those against was that there was a greater need to address the behaviour of some cyclists.



“Some cyclists go really fast and lack consideration. Calling it a Cycling Superhighway is unfortunate”

Both groups were supportive of general steps to make roads more conducive to cycling. However, both reported issues with the speeds travelled by some. This issue could make it difficult for pedestrians to cross roads within the scheme and neighbouring it. Both said that calming measures were needed.

Both groups felt that the name Cycle Superhighway suggested itself to being a route which cyclists should use at speed.

3. Consultation processes and forecasting the impact of proposed schemes

A view that the consultation was not transparent and did not include all that it should have done.

People who were against the scheme felt that there were lessons to learn from the consultation.

One said that an impression had been left in the community that the process had not been transparent, and that some residents had had greater influence in shaping the final proposals than others.

The resident said that the move to expand the scheme from that initially planned was due to residents of streets which would see significant displacement as a result of the original plan, lobbying for changes which would remedy this. This was done in a meeting which was not widely advertised.

She sympathised with the concerns that residents had but said that the impact of this lobbying had meant that residents living on some other roads had been significantly disadvantaged.

She said that more could have been done to secure the engagement of all groups in the consultation; in particular residents living in the social housing which was heavily prevalent on the more major roads where traffic was being dispersed to. She said that Tenant and Resident Associations representing those in these units were not identified as a living stakeholder contacted as part of the consultation.

“There was an equal distribution of traffic along 8 roads. Now 6 roads are very nice and 2 are a bottleneck...this does not fit in with Hackney a Place for Everyone strategy”.

A view that the impact of the schemes should have been better recognised and communicated

Residents against the scheme felt that it should – at design and consultation stage – have better and more accurately predicted the impact that it would have on the wider area roads not being closed, and made this clear on consultation documents. The scheme which went live should have included within it measures to mitigate the displacement impact.

Without this, schemes could not claim to be well thought out.

4. Suggested improvements to the scheme

Scale back

Those against the scheme felt that it should be fully rethought and made smaller. Reducing the numbers of roads closed to through traffic would mean that the dispersal issues caused would be better spread.

Expand

Those supportive of the scheme felt that the dispersal affects should be managed by exploring solutions for those detrimentally affected.

Signage

There was a common view among both groups that signage of the scheme should be improved. Although the experimental scheme had been in place for some time drivers continued to turn into roads that they then found to have barriers on. This and their reversing back onto main roads caused safety issues. It was felt that signage on the main roads in advance of these roads would help this issue.

A suggestion was made that the signage should advise drivers that a road closure scheme was in operation, and that they should follow main roads.

Making main roads taking the traffic more flow-friendly

Part of the congestion on Crossway was due to drivers being able to turn right onto the A10. This held up traffic behind vehicles turning right. The turn right option should be removed.

Reviewing provision of the size and spread of passing places and the locations of cycle hangers on the open roads

Those against the scheme wanted more significant change than improving fluidity in the open roads. However, both groups mentioned that a cycle hanger was inappropriately located at one of the junctions of Walford Road which exacerbated the issues caused by dispersal. Both the size and spread of passing places should be reviewed to better allow traffic to move through.

Questions asked:

- Can you tell us your understanding of the council's objectives in closing streets to through traffic?
- Can you tell us what you think are any local benefits?
- Can you tell us what you think are any local disbenefits?
- Do you think the policy is beneficial /problematic for the wider area / borough. Please tell us the reasons for your answer?
- How have the road closures affected you personally?

ⁱ Local Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment, adapting to climate change and securing good design. They set out what is intended to happen over the life course of the plan, and where and how this will occur.ⁱ