Hackney

TITLE OF REPORT - General Exception, School Street (SS32) at Harrington Hill Primary School and Low Traffic Neighbourhood (LTN) on Mount Pleasant Lane (Experimental to Permanent) **Key Decision No - NH S075**

CABINET MEETING DATE (2021/22) 14 March 2022	**CLASSIFICATION:** Open

WARD(S) AFFECTED Springfield / Lea Bridge
CABINET MEMBER Cllr Mete Coban, Cabinet Member for Energy, Waste, Transport and Public Realm
KEY DECISION Yes **REASON** Affects two or more wards
GROUP DIRECTOR Ajman Ali, Group Director Neighbourhoods and Housing

1. CABINET MEMBER'S INTRODUCTION

1.1. Hackney was one of the first local authorities in the world to implement School Street schemes. We started our programme in 2017, by piloting School Streets outside of five schools.

1.2. Since then, the Hackney School Streets programme has continued to go from strength to strength. Hackney currently has 48 schemes in operation, covering 51 schools and benefiting about 14,000 children.

1.3. Hackney continues to make it safer to walk and cycle to school for our most vulnerable residents and is making strides towards reclaiming our streets from the dominance of motor vehicles.

1.4. The results are demonstrated in figures for 'mode of travel to school', which are collected annually by the Council. The survey showed that 69% of pupils travelled to school using active modes, our highest active travel rate recorded. The number of pupils cycling to school was also the highest rate ever recorded.

1.5. Making the School Street and Low Traffic Neighhbourhood (LTN) filter permanent will lock in the safer travel to school and traffic reduction benefits which have been delivered during the experimental period of operation, whilst maintaining access for residents and blue badge holders, carers and others who need it.

1.6. What is more, the level of acceptance of School Streets is high, with results from independent polling showing that around 7 in 10 residents want at least some of the School Streets to be made permanent.

2. GROUP DIRECTOR'S INTRODUCTION

2.1. The School Street and LTN filter on Mount Pleasant Lane was introduced in November 2020 as part of the borough's response to the transport challenges presented by the Covid 19 pandemic.

2.2. The report seeks to make permanent the two traffic orders which introduced the School Street & LTN filter at the end of the 18 month experimental period. The other recommendation is to withdraw the banned left turn restriction from Southwold Road to A107 Upper Clapton Road, to allow officers more time to carry out further investigations on any future proposals for this location.

2.3. The existing experimental traffic orders which introduced the School Street & LTN filter are due to expire on 4 April 2022. If they are not made permanent the road layout will revert to reintroduce 2 way traffic at all times. Were this to take place, the benefits which have been realised of creating a quieter

environment for local residents and school children attending Harrington Primary School will be reversed.

2.4. Furthermore, the Secretary of State for Transport has written to local authorities to remind them that decisions to remove any measures introduced in response to the Covid pandemic must be based on as robust an evidence base as decisions to keep them. This includes traffic counts, pedestrian and cyclist counts, traffic speed, air quality data, public opinion surveys and consultation responses. The report has reviewed all the available data and considers feedback received during the experimental period and the alternative options considered.

2.5. The evaluation of the experimental period shows that the scheme has succeeded in achieving its primary objectives to reduce congestion at the school gates, create a better balance between pedestrians and cyclists and vehicles, making it easier and safer to walk and cycle to school. It has also addressed the problem with rat-running traffic using Mount Pleasant Lane to divert away from congestion on Upper Clapton Road and created a more pleasant environment for active travel.

2.6. The Council has undertaken its Public Sector Equalities duty in assessing the equalities impacts of the School Street and Low Traffic Neighbourhood during the experimental period. On balance the schemes have a positive or neutral impact on groups with protected characteristics, with vulnerable groups such as children particularly benefiting. Officers have also given consideration whether it is necessary to consider amending the operation of the schemes in any way to accommodate specific cohorts.

2.7. The measures introduced are consistent with the Council's policies for introducing School Streets and Low Traffic Neighbourhoods. They have also had the positive benefit during the pandemic of providing space for social distancing by reducing the dominance of motor vehicles outside the school gate making it safer to step off the pavement to maintain social distancing.

2.8. A further recommendation to review the operation of the School Street and LTN filter will be undertaken in approximately 12 months. This will allow officers to observe how the scheme is operating under more normal traffic conditions, post coronavirus pandemic.

3. RECOMMENDATIONS

3.1. That Cabinet approve to make permanent the Harrington Hill Primary School School Street and Mount Pleasant Lane Low Traffic Neighbourhood experimental scheme on 25 March 2022, with amendments described in this report, and:

3.1.1. Authorise the Head of Streetscene to make and implement the necessary permanent traffic orders, subject to the requirements of the

Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996.

3.1.2. Authorise the Head of Streetscene to make minor adjustments to the proposals as required, following design development and feedback from key stakeholders and local residents.

3.1.3. Authorise the Head of Streetscene to implement permanent features to replace the existing temporary planters to reinforce the existence of the restrictions, improve the aesthetics of the scheme and achieve greater compliance, subject to funding and feedback from stakeholders and local residents.

4. REASONS FOR DECISION

4.1. This report contains the results of the monitoring and evaluation of the experimental scheme, including consultation responses and objections received for consideration.

4.2. Evidence from the monitoring and evaluation of the experimental scheme shows:

- Low traffic outside Harrington Hill Primary School at school opening and closing times, suggesting reduced congestion outside the gate
- Improved air quality by reducing transport emissions near the Harrington Hill Primary School entrance
- Increased road safety and accessibility for non-motorised users
- Increased walking and cycling to Harrington Hill Primary School for pupils and parents/carers
- Increased provision of space for social distancing outside the school gate and in the street/approach to the school
- Reduction of through-traffic using Mount Pleasant Lane to bypass traffic signals on Upper Clapton Road

4.3. Therefore, the proposals will help to make Hackney a more sustainable, greener and safer borough by encouraging more sustainable modes of transport, which in turn contributes to improving local air quality, reducing car dominance, reducing accidents and creating environments that prioritise walking, cycling and public transport.

4.4. The Council is also committed to its 2019 Climate Emergency Declaration to achieve a 45% reduction in emissions against 2010 levels and net zero emissions by 2040. Delivering School Streets and a reduction in the number of cars rat-running through our borough is seen as a key contributor to Hackney achieving this target.

4.5. Under the Traffic Management Act 2004, local authorities have a duty of care to all road users, including pedestrians and cyclists, and to facilitate a more

sustainable and better use of road space.

4.6. **Scheme Description**

4.7. The scheme is made up of two complementary measures: a School Street measure and a Low Traffic Neighbourhood modal filter. The location and layout of these measures is shown in Appendix 1.

4.8. **School Street:** The School Street measure is a timed 'Pedestrian and Cycle Zone' on Mount Pleasant Lane, from the junction of Bakers Hill to the LTN traffic filter on Mount Pleasant Lane at the junction of Springfield Gardens, including Harrington Hill, between 8:30am - 9:30am and 3:00pm - 4:00pm. The Pedestrian and Cycle Zone operates Monday to Friday during school term-time only.

4.9. The School Street restriction is indicated by regulatory signs that state 'Pedestrian and Cycle Zone, 8:30am - 9:30am and 3:00pm - 4:00pm, except permit holders SS32' that are placed at the entry/exit points to the School Streets zones. The signs fold to become covered when the zone is not in operation during school holidays.

4.10. The restriction is enforced by Automatic Number Plate Recognition (ANPR) cameras.

4.11. The School Street measure, in common with other School Street schemes in the borough, covers a zone that contains many properties within it. Therefore, a number of exemptions are permitted to allow access to properties within the zone:

4.11.1. Access for residents and businesses would be maintained if the vehicle is registered for an exemption

4.11.2. Parents or carers can register for an exemption to drop their children off to school if they or their child are a Blue Badge holder

4.11.3. Access would be permitted for Dial-a-ride, Emergency Services vehicles, Hatzola community ambulance and waste services vehicles

4.11.4. Two-way access for cyclists would be permitted at all times through the zone

4.11.5. Other vehicles driven by visitors, parents, delivery vehicles and school staff would not be permitted to enter the zone during the closure periods

4.11.6. All vehicles already within the zone during the operational times would be able to exit

4.12. **Low Traffic Neighbourhood (LTN) Traffic Filter:** The LTN filter element of the scheme is a prohibition of motorised traffic restriction at Mount Pleasant

Lane near the junction with Springfield Gardens and associated right turn restriction from Springfield Gardens to Mount Pleasant Lane.

4.13. A detailed map of the scheme at the junction between Mount Pleasant Lane and Springfield Gardens is shown in Appendix 2. The location of the LTN filter in context of the wider road network is also shown in Appendix 3.

4.14. The following vehicles are exempt from the restriction: ambulances, fire engines, police vehicles (used for emergency services purpose), Hackney Council refuse vehicles, and Hatzola community ambulances.

4.15. **Amendments to the scheme:** The experimental scheme design originally included a banned left turn restriction from Southwold Road into A107 Upper Clapton Road. This element was not implemented and is proposed to be withdrawn.

4.16. Hatzola community ambulances were not originally exempt at the start of the experimental period. An exemption was introduced during the experimental period and is proposed to be retained.

4.17. **Outcome of the Experimental Period**

4.18. The success of the experimental period can be measured against the original objectives of:

- Reducing the congestion in the street at school opening and closing times
- Improving air quality and reducing emissions around the school gates
- Increasing road safety and accessibility for non-motorised users
- Encouraging walking and cycling to school for pupils and parents/carers
- Providing pupils, parents/carers and staff with more space for social distancing outside the school gate and in the street/approach to the school.
- Reducing through-traffic using Mount Pleasant Lane to bypass traffic signals on Upper Clapton Road

4.19. The monitoring results for the School Street (timed Pedestrian and Cycle Zone) at Harrington Hill Primary School and Mount Pleasant Lane LTN are outlined below.

4.20. **Traffic analysis**

4.21. **Impact of School Street restriction:** School Street schemes aim to improve the environment for pedestrians and cyclists on their way to school by reducing the number of vehicles passing the school gate to a minimum at scheme operating times. To assess whether a School Street scheme is achieving its primary aim - to reduce motor traffic outside of school gates, at

school opening and closing times - changes in traffic volumes at specific times are measured. Changes to traffic volumes in a School Street scheme are usually measured through Automatic Traffic Counts (ATC) taken before and after the scheme is implemented. In the case of this scheme, pre-implementation ATC data specific to the School Streets timings was not available as the schools were impacted by Covid 19 closures immediately prior to the scheme implementation in September 2020 and general traffic patterns were disrupted. However, historic traffic counts conducted in 2010 and a traffic estimating exercise from 2018 provide a pre-implementation picture of traffic levels across an average day, but do not provide hourly data. Post-implementation automatic traffic counts were undertaken in November 2020 (approximately two weeks after implementation), May 2021 (eight months after) and February 2022 (fifteen months after) and provide some evidence as to whether the area near the school gates is dominated by motor vehicles or pedestrian and cycle friendly.

4.22. **Table 1** shows that, following implementation of the LTN and School Street, the volume of motor traffic on Mount Pleasant Lane in the one hour periods corresponding with the school-run were low.

4.23. Between November 2020 and May 2021, there was a slight increase in traffic at 8:30-9:30am, and a slight decrease in traffic at 15:00-16:00, however the number of vehicles still indicates that Mount Pleasant Lane is a low traffic environment with fewer than 1 vehicle per minute. Further monitoring will be carried out as the country emerges further from the pandemic.

4.24. The traffic counts on Mount Pleasant Lane during the School Street times show that traffic outside the school gates is low and suggest that the primary objective of the scheme - to reduce congestion at the school gates and to provide space for walking and cycling to school - has been successful.

Table 1: **Traffic Counts on Mount Pleasant Lane during School Street times (two-way 5-day average)**

	Nov 2020	**May 2021**	**Average post-scheme**	**Change between Nov '20 and May '21**
AM (08:30 - 09:30)	33	47	40	+14
PM (15:00 - 16:00)	40	38	39	-2

4.25. Traffic counts were also undertaken at two locations outside the School Street zone, on Moresby Road (where Harrington Hill Primary School has a second entrance) and Springfield to the north of the LTN restriction. This was done to assess potential displacement resulting from the School Street and the LTN traffic filter. Two-way traffic flows were used for the analysis of both locations.

4.26. **Table 2** presents traffic counts on Moresby Road, and shows that traffic flows are higher on Moresby Road than Mount Pleasant Road where the School Street operates and the LTN is located. Traffic flows after the scheme was implemented were on average between 150-160 vehicles during each of the

one hour periods in the morning and afternoon that school streets operate, this equates to 2.6 vehicles per minute.

4.27. While it was not possible to compare before and after traffic counts for the School Streets time periods to assess the impact of the School Street on Moresby Road during the School Street operational times, the relatively low level of traffic during these times suggest that any displacement impacts, if there are any, result in a situation that is acceptable. However, this will continue to be monitored as the country emerges from the pandemic.

Table 2: **Traffic Counts on Moresby Road during School Street times (two-way average)**

	Nov 2020	**May 2021**	**Average post-scheme**	**Change between Nov '20 & May '21**
AM (08:30 - 09:30)	171.2	142.5*	157	-28.7
PM (15:00 - 16:00)	168.6	138.3*	153	-31.3

*May 2021 data is only available as a two-day average on Moresby Road in the AM and as a three-day average in the PM.

4.28. **Table 3** presents traffic counts on Springfield, and shows that traffic flows are higher on Springfield than Mount Pleasant Lane where the School Street and LTN operates. Concerns were raised regarding traffic congestion on Springfield during the experimental period, in particular with regards to accessing Side by Side School on Big Hill and therefore additional traffic counts as well as site observations were conducted to monitor the situation.

4.29. Traffic counts indicate that during the School Street operating times, traffic levels on Springfield varied between a low of 53 vehicles in one hour (March 2021 PM count), and a high of 196 vehicles in a one hour period (Feb 2022 AM count).

4.30. On average, traffic levels on Springfield after the scheme was implemented were 141 vehicles, two-way, from 8:30am-9:30am and 120 vehicles, two-way, from 15:00-16:00. By comparison, this average is lower than Moresby Road although it is noted that the latest counts represent the highest recorded counts and are higher than Moresby Road. The average flow on Springfield was 2.2 vehicles per minute, the highest was 3 vehicles per minute.

Table 3: **Post-implementation traffic counts on Springfield during School Street times**

	Automatic traffic counts 26 Nov 2020 - 3 Dec*	Manual Traffic counts Nov/ Dec 2020	Manual Traffic counts 16-17 March 2021 (avg)	Automatic traffic counts 17-21 May 2021**	Feb 2022***	Average post-scheme	Change between Nov 2020 and Feb 2022
AM (08:30 - 09:30)	162	143	112	92	196	141	34
PM (15:00 - 16:00)	157	110	53	108.4	172	120	15

*Nov 2020 AM data is only available as a 3-day average, and PM as a 4-day average, on Springfield
**May 2021 data is only available as a four-day average on Springfield in the AM
*** Feb 2022 data is taken from 3-day average

4.31. Concerns were raised during the experimental period that access to Big Hill (and therefore Side by Side School) was restricted as a result of reducing the number of route options to the school by removing the option of using Mount Pleasant Lane as the approach to Big Hill. The concern was that there would be displacement from Mount Pleasant Lane onto Springfield from vehicles accessing Big Hill that previously used Mount Pleasant Lane, including vehicles accessing Side by Side School which would then get stuck in congestion on Springfield. This is expected to be offset by a greater reduction in through-traffic that was previously using Springfield and Mount Pleasant Lane to bypass Upper Clapton Road. Similar to the other locations, 'before' the scheme counts for the one hour time periods are not available to assess the impact of the scheme on traffic volumes on Springfield at specific times of day.

4.32. Traffic volumes in this order observed on Springfield would normally be considered insufficient to cause congestion concerns, however, it is recognised that hyper-local congestion on urban roads is possible even with low traffic volumes due to events such as obstructions caused by loading vehicles (i.e. waste lorries) or other temporary obstructions. And such an incident was observed during an officer visit in December 2020, when traffic was held up for 10 minutes by a larger vehicle.

4.33. However, evidence of congestion could be assessed using the traffic speeds recorded by ATCs and **Table 4** shows that over 7 days in February 2022, 99.85% of vehicles on Springfield were travelling at greater than 5mph, suggesting that widespread gridlock was not occurring.

Table 4: Recorded speeds on Springfield, 7 day totals, February 2022

Speed bins (mph)	0 - 5	5 - 10	10 -15	15 - 20	20 - 25	25 - 30	30 - 35	35 - 40	40 - 45	45 -50
Total number vehicles 7-day	**19**	**412**	**1681**	**5292**	**3680**	**917**	**218**	**45**	**14**	**13**
% of total	0.15 %	3.35%	13.66%	43.00%	29.90%	7.45%	1.77%	0.37%	0.11%	0.11%

4.34. Furthermore, Officers have contacted the school transport providers for Hackney and Haringey Councils for feedback. Neither operator has raised with the Council any difficulties experienced by their vehicles using Springfield, rather than Mount Pleasant Lane and confirm that the diversion route to Side-by-Side school (via Springfield) is not negatively impacting their journey times.

4.35. **Traffic Impact of Low Traffic Neighbourhood (LTN) Mount Pleasant Lane Traffic Filter**

4.36. The LTN filter on Mount Pleasant Lane near the junction with Springfield Gardens is a 24 hour restriction to discourage through-traffic from using neighbourhood streets and encourage people to switch local car journeys for walking and cycling, wherever possible. To monitor its impact as a 24 hour restriction, daily average traffic volumes are used.

4.37. To measure changes in daily traffic flows at Mount Pleasant Lane, ATCs were carried out in November 2020 and July 2021 and these were compared against pre COVID - 19 figures. The closest available figures were undertaken in 2010.

4.38. There are necessary caveats in using data from 2010 as the baseline data. According to Department for Transport figures, between 2008 and 2020 traffic on London's residential roads rose from 6.25 billion to 10.25 billion miles. A rise of 64% on small residential roads[1].

4.39. In Hackney, traffic had increased between 2012 and 2019 and had reached 340 million vehicle miles in 2019. Traffic by road type is not available at the borough-level, but there was no reason to suggest the London-wide trend - of the increased traffic being borne by minor roads - was being avoided in Hackney[2].

4.40. This means that traffic counts from 2010 are likely to pre-date much of the problem that the scheme is designed to address, namely, the increase in traffic on minor roads. However, these are the most recent traffic counts at these locations before the pandemic, and therefore have been used as a comparison.

4.41. The data in **Table 5** shows that (pre-implementation of the ETOs) traffic volumes on Springfield and Mount Pleasant Lane were very similar to one another, with a 7 day average of 1560 and 1587 vehicles respectively.

[1] https://roadtraffic.dft.gov.uk/regions/6
[2] https://roadtraffic.dft.gov.uk/local-authorities/122

Following the implementation of the ETO, traffic counts show a large decrease in traffic volumes on Mount Pleasant Lane and marginal increases on Moresby Road and Springfield.

Table 5: **Changes in daily traffic flows in the Mount Pleasant Lane area compared to pre-Covid Baseline**

Changes in daily traffic flows in the Mount Pleasant Lane area compared to pre covid baselines								
Location	**Pre Implementation daily traffic counts (Baseline figures) (2010)**		**During Implementation (Nov 2020)**		**Post Implementation daily traffic counts (May/ July 2021)**			
	Date	**Total**	**Date**	**Total**	**Date**	**Total**	**Diff.**	**%age**
ATC 1 - Mount Pleasant Lane	02/2010	1587	11/20	884	07/21	206	-1381	87% fall
Moresby Road	12/2010	1260	11/20	1623	05/21	1321[3]	+61	5% rise
Springfield - Outside Lea View House	02/2010	1560	11/20	1225	05/21	1340	-220	14% fall
					02/22	1668	108	7% rise
Upper Clapton Road (A107) - south of jw Rossington Street	2019 [4]	23398	11/20	21033	7/21	22224	-1174	5% fall

4.42. Overall traffic patterns across the country were affected by the Covid-19 pandemic throughout 2020 and into 2021, making direct pre and post implementation comparisons difficult. However, in the weeks in May and July 2021 when the most recent ATCs on Mount Pleasant Lane and Moresby Road were conducted, traffic levels in the country were back up to 95% of pre-pandemic levels, which could partly account for the increase in traffic between Dec 2020, when national traffic levels were approximately 80% of pre-pandemic levels and May 2021 when they were 95%.

4.43. The table shows a slight rise in traffic of 5% at Moresby Road compared to 2010 figures. The rise in traffic flows at Moresby Road could be due to the

[3] 5-day average used due to equipment failure on two days
[4] Annual Average Volume - Estimated (DfT)count south of Cazenove Road

reduced number of available options for traffic wishing to gain access to Harrington Hill Primary School using the Moresby Road end, or it could be due to vehicles using Jessam Ave and/or Moresby Road to avoid the traffic lights on Upper Clapton Road instead of Springfield and Mount Pleasant Lane. This is not considered a significant increase, however, it will be monitored annually.

4.44. The table also shows a 7% rise in traffic flows at Springfield in February 2022, which is 108 more vehicles than the baseline from 2010 and while this is an increase, it does not indicate mass displacement of traffic from Mount Pleasant Lane onto Springfield.

4.45. In addition, in 2019 the Council commissioned a study into traffic in the borough called "Through Traffic in Hackney" (2019). This project involved purchasing GPS tracking data supplied by data analytics firm Inrix, from three months in 2018 (June, September and October), then, this sample was scaled using DfT traffic counts to bring the sample up to the total traffic levels and to correct for sample bias to give an estimated daily annual flow. It is not a traffic count. This data was used to estimate the volume of traffic on Springfield in 2018. The estimate for Springfield was made using a GIS query tool which was supplied alongside the main report by Peter Davidson consultants. The 2018 estimate for Springfield is provided below, but has not been used as the baseline as it is a different methodology to the ATCs used for post-scheme monitoring. This set of data suggests Springfield had an estimated 5403 daily flow on the road in 2018. This is significantly higher than the observed 1560 in 2010. While the 2018 figure is an estimate, the large increase follows a trend during that period of increases in traffic on minor roads, predicted to be an effect of the rise of sat navs which direct drivers through minor roads to 'beat the traffic' on main roads (DfT stats show 24% increase in urban minor roads between 2010 and 2018). **Table 6** presents the Inrix Modelled data alongside the available ATC collected data.

Table 6: **Changes in daily traffic flows on Springfield, comparing Inrix Modelling and ATCs**

Location	Feb 2010 ATC	2018 Inrix modelled	Nov/ Dec 2020 ATC	May 2021 ATC	Feb 2022 ATC
Springfield - Outside Lea View House	1560	5403*	1225	1340	1668
% Change (2010 base)		+246.35%	-21.47%	-14.10%	+7%

4.46. There is no monitoring data for Southwold Road as it was withdrawn.

4.47. **Enforcement**: The School Street restriction at Baker's Hill is enforced by mobile Automatic Number Plate Recognition (ANPR) cameras that issue a Penalty Charge Notice (PCN) to any non-exempt vehicles entering the School Street zone during its operating hours. The mobile camera unit conducts spot check enforcements, and enforced the School Street in February 2022 and March 2022.

4.48. School representatives have reported that some drivers have been ignoring the restrictions and officers will continue to monitor and if further enforcement is necessary, a fixed ANPR camera can be provided, but is not proposed at this time as traffic is low outside of the school gates (as per the ATC data above).

4.49. The LTN measure was enforced by fixed ANPR camera and **Table 7** shows a total of 4225 PCNs were issued for contravening the motor vehicle prohibition at Mount Pleasant Lane between February and November 2021.

Table 7 - **PCNs issued at Mount Pleasant between February and November 2021**

Location	PCNs per month between Feb 2021 and November 2021										
	02/21	03/21	04/21	05/21	06/21	07/21	08/21	09/21	10/21	11/21	Total
Mount Pleasant Lane	1	1	191	864	738	568	489	538	400	435	**4225**

4.50. **Reduction in pollution**

4.51. Parents are increasingly concerned about poor air quality around London's schools as inhaling polluted air can affect children's health and well being. Implementing School Streets can go a long way to improving air quality and the health of children. Analysis by King's College London of Hackney's first four School Streets estimated a 74% reduction in air pollution emissions at the school gates during the School Streets operational times.

4.52. A wider monitoring study was commissioned by the Greater London Authority to investigate the air quality benefits of School Streets in London as part of the Mayor's response to the pandemic. The project's aim was to quantify the air quality benefits of introducing School Streets by measuring changes to pollutant concentrations during those times that the schemes were in operation.

4.53. A total of 30 AQMesh sensors were installed near to schools in Brent, Enfield and Lambeth. These sensors were fitted adjacent to, and at each end of sections of road that formed School Streets schemes. Comparator sensors were also installed outside schools where no School Street was in place. The selected schools had similar road layouts, traffic patterns and closure times to School Streets installed in Hackney, allowing comparisons to be drawn from the results.

4.54. The confounding effects of Covid-related travel restrictions during the monitoring period and day-to-day weather changes made it difficult to identify the precise role played by the School Streets on air quality at all the schools. However, at some sites, a clear effect has been seen. A comparison of concentration profiles at similar sites (one with a School Street, the other

without) identified average reductions in NO concentrations of 34% and NO2 concentrations of 23% during the morning closure. The morning intervention alone is thus expected to have reduced the school day average for NO by 5% and NO2 by 2%. This is unsurprising as the morning drop off coincides with the morning peak traffic period, whereas in the afternoon, pick up is well before the evening traffic peak.

4.55. The TfL Attitudinal Survey (see 5.32) highlighted that 18% of parents/ carers reported driving less as a result of their child's school having a School Street, which can reasonably be expected to have reduced pollutant emissions associated with the school run, but the precise level cannot be quantified as the actual change in car trips is not known.

4.56. Hackney has a robust Air Quality monitoring regime which includes a Diffusion Tube monitor at Harrington Hill School. Diffusion tube data becomes available annually after a centralised verification process and therefore 2021 data for Harrington Hill is not available at the time of writing, but will be available in May or June 2022 and will be published here: https://hackney.gov.uk/air-quality/.

4.57. The reduction in traffic volumes on Mount Pleasant Lane will have by extension reduced the volume of transport based emissions near the school, however, until the diffusion tube data is available, the impact of the reduction in emissions on overall concentrations of pollutants is not available.

4.58. **Increase road safety and accessibility**

4.59. In 2018 there were nearly 2,000 child casualties from road traffic collisions in London. Reducing vehicle traffic directly outside the school gates, would also reduce the risk of collisions occurring if those children arriving at school on foot and by bicycle, are forced to step into the carriageway to try and socially distance themselves.

4.60. Road traffic collision data for the School Street at Harrington Hill Primary School and LTN at Mount Pleasant Lane was analysed from the periods before and after implementation using STATS19 data.

4.61. **Casualty statistics**: The evidence for this objective is anecdotal as the number of officially recorded casualties (STATS 19 collision data) was two traffic incidents on Mount Pleasant Lane and Harrington Hill since 2015. Both incidents were categorised with a severity of 'slight'. There have been no incidents outside Harrington Hill school since 2015. At this point in time there is no post-implementation (2021) data this can be compared to.

4.62. **Encourage active travel to school**

4.63. Each year, the Council collects travel to school data using a 'Hands up' survey from every school in the borough. In 2020/21 the highest return was achieved, with 62 schools completing the Mode of Travel Survey, stating how they journey to or from school.

4.64. Advice on school travel when returning to schools in September 2020 was to encourage parents/carers, staff and pupils to walk or cycle wherever possible, only drive if absolutely necessary and avoid public transport. By comparing 2021 data with pre-Covid survey data from 2006-2019, it is possible to see if this advice has been heeded, and if and how travel patterns have changed or not.

4.65. Surveys on how pupils at Harrington Hill Primary School travel to school were conducted before and after the implementation of the scheme. Data was collected in 2006, 2007, 2010, 2011, 2015, 2016, 2019 and 2021, with no surveys being completed by the school in the years not listed.

4.66. Travel to school modal split between 2006-2019 (before the School Streets scheme was implemented) and May 2021 (post-implementation) at Harrington Hill Primary School shows (see **Figure 1**):

4.67. The percentage of pupils travelling by car has fluctuated across the survey years. The percentage of pupils travelling by car in 2011 was lower between 2007-2011 than in the following years, with very low levels of car use shown in 2011 (3.3%). Although being higher than preceding years, the percentage of pupils travelling by car has been fairly consistent (between 17.4% - 22.3%) since 2015, demonstrating no recent significant change in car use. This level of car use is above the borough primary school average of 16%.

4.68. The data shows that a high proportion of pupils at Harrington Hill travel to school on foot, with 67.2% walking to school in 2021. The percentage of pupils travelling on foot was higher between 2006-2011 than between 2015-2021. Levels of walking to school increased year on year between 2006-2011 but then fell considerably in 2015. Since 2015 the percentage of pupils walking to school has however increased from 58.8% to 67.2%.

4.69. The proportion of pupils cycling to school remained low from 2006-2021, however it has increased from 0.3% in 2016, reaching 1.2% in 2021.

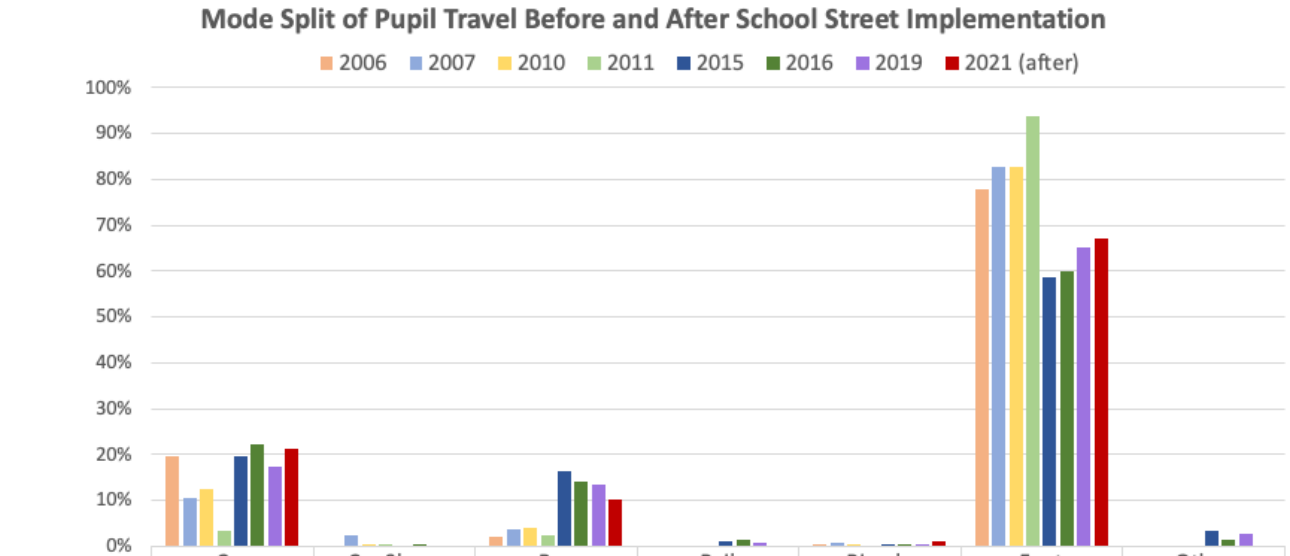
4.70. Travel to school by bus was low (2-4%) between 2006-2011, however it increased in 2015 to 16.5%. Since 2015 the proportion of pupils travelling by bus has decreased year on year, with 10.2% travelling by bus in 2021. The decrease between 2019-2021 could be attributed to concerns over covid transmission. In addition, a consistently low proportion of pupils travel to school by rail. The school is located in an area with a low PTAL rating of 2, meaning that public transport may not have been a suitable option preceding the pandemic.

4.71. Overall, the mode of travel data for Harrington Hill Primary School demonstrates that travel to school by active modes is high, with over two-thirds (68.4%) of pupils travelling by foot or by bicycle in 2021 and has increased from a low point of 59.3% in 2015. While the increase in active travel is small in terms of actual pupils, and the increase between 2019 and

2021 is marginal, it represents the continuation of a positive trend of a 15% increase since 2015.

4.72. The proportion of pupils travelling to school by car has remained fairly consistent since 2015, with levels being above the borough primary school average.

Figure 1: Percentage of pupils by mode of travel to school before and after the School Street was implemented - Harrington Hill Primary School



	Car	Car Share	Bus	Rail	Bicycle	Foot	Other
2006	19.5%	0.0%	2.0%	0.0%	0.5%	78.0%	0.0%
2007	10.6%	2.3%	3.7%	0.0%	0.9%	82.6%	0.0%
2010	12.6%	0.5%	3.9%	0.0%	0.5%	82.6%	0.0%
2011	3.3%	0.4%	2.5%	0.0%	0.0%	93.8%	0.0%
2015	19.8%	0.0%	16.5%	1.1%	0.5%	58.8%	3.3%
2016	22.3%	0.5%	14.2%	1.3%	0.3%	60.0%	1.5%
2019	17.4%	0.0%	13.4%	0.9%	0.6%	65.1%	2.6%
2021 (after)	21.3%	0.0%	10.2%	0.0%	1.2%	67.2%	0.0%

4.73. **Providing space for social distancing**

4.74. At the time of writing, there is no longer a need for space for social distancing. The current Statutory Guidance[5] includes the following, *"The removal of social distancing requirements means temporarily widened footways may no longer be needed in many places and authorities should consider removing these and reinstating the original road layout, including any parking bays. However, the potential to encourage walking and improve public spaces through retaining widened footways permanently should be carefully considered."* While this statement directly refers to widened pavements, the principle applies also to other space that had been reallocated for social distancing, such as road space outside of school gates that allowed for social distancing while social distancing requirements were in place and which do also

[5] Traffic Management Act 2004: network management to support recovery from COVID-19 Updated 30 July 2021.

encourage walking and cycling. Children and their parents/ carers need to have the confidence to walk and cycle to school safely and retaining space outside of school gates contributes to creating the conditions for walking and cycling.

4.75. **Financial Implications**

4.76. **Traffic Management Orders:** The infrastructure erected for the experimental period will be retained, so the only additional costs will be associated with the statutory process for the Traffic Management Orders for School Street and LTN traffic filter on Mount Pleasant Lane, of approximately £500.

4.77. **Traffic counts:** There will be an ongoing financial implication for monitoring traffic volumes at each School Street scheme of approx. £100 per annum per scheme.

4.78. **Enforcement**: A potential financial benefit is created by the scheme through the issuing of penalty charge notices (PCNs) to drivers of vehicles in contravention of the Traffic Management Orders at some locations where it is necessary to ensure compliance using ANPR camera operation (although it is not possible to predict the volume of these).

4.79. **Legal Implications**

4.80. A local authority is empowered under the Road Traffic Regulation Act 1984 to make an experimental traffic order ("ETO") "for the purposes of carrying out an experimental scheme of traffic control" which may continue in force for a maximum of 18 months. The order may empower an officer to modify or suspend the order.

4.81. Regulation 23 of the Local Authorities Traffic Orders (Procedure) (England & Wales) Regulations 1996 sets down the procedure for an order where "the sole effect of an order ('a permanent order'), which is not an order made under section 9 of the 1984 Act, is to reproduce and continue in force indefinitely the provisions of" an ETO or ETOs.

4.82. The statutory requirements ordinarily applicable to an order that does not solely continue in force the provisions of an ETO are disapplied on condition that the requirements in Regulation 23(3) have been complied with. The requirements imposed by Regulation 23(3) are, among other things, that the notice of making the ETO made clear that the authority would be considering making the order permanent and that any person could, within six months of the making of the ETO, object to the authority making the order permanent.

4.83. Before making a permanent order, an authority must consider all the objections that are made in response to the notice of making published in respect of the relevant ETO.

4.84. Any person may within 6 weeks apply to the High Court to question the validity of a permanent order but an order may not otherwise be questioned in any legal proceedings whatever.

4.85. In addition to the statutory framework applicable to ETOs, the network management duty in s.16 of the Traffic Management Act 2004 is a continuing duty and the authority is obliged pursuant to s.17 TMA 2004 to keep its performance of the network management duty under review.

4.86. The public sector equality duty continues to apply when making an experimental scheme permanent.

5. DETAILS OF ALTERNATIVE OPTIONS CONSIDERED AND REJECTED

5.1. Consideration was given to the following options for the School Street at Harrington Hill Primary School, LTN on Mount Pleasant Lane and banned turn from Southwold Road:

5.2. **Option: to do nothing**. The option of doing nothing was considered, by which the experimental traffic orders of the schemes would expire and the road layout would revert to previous i.e. the School Street, LTN traffic filter on Mount Pleasant Lane and banned turn at Southwold Road, would be removed and access would be restored for two way traffic at all times. Note: Government advice July 21 states that 'make schemes permanent' should be the default position unless compelling evidence is provided to do otherwise.

5.3. **Option: to make the School Street permanent, and not make permanent the LTN traffic filter on Mount Pleasant Lane or the banned turn on Southwold Road**. The option to only implement the School Street permanently, and not the LTN traffic filter on Mount Pleasant Lane or banned turn from Southwold Road was considered. As described in this report, both the School Street and LTN traffic filter on Mount Pleasant Lane have achieved the objectives set out in the experimental period, therefore removing the LTN traffic filter on Mount Pleasant Lane would revert the road layout and reverse the traffic reduction and increased road safety outcomes which the scheme has achieved in the experimental period.

5.4. **Option: to make the School Street and LTN traffic filter on Mount Pleasant Lane permanent, and modify the existing exemption criteria/policy to permit private vehicles with a special exemption to travel through the LTN traffic filter**. The option to make the School Street and LTN on Mount Pleasant Lane permanent, and modify the existing exemption criteria and policy was considered and dismissed in the ongoing review of the equalities impacts of the schemes, see section 6 of this report. Modification to the existing exemption criteria is not necessary as there are existing systems in place for dealing with requests for special exemptions from School Street schemes and to ensure that travel to school by SEND pupils in the borough is not impacted by School Streets restrictions.

BACKGROUND

6. Policy Context

6.1. The Council is committed to making Hackney's roads safer and more accessible for everyone living, working and visiting the Borough. Encouraging the use of more sustainable modes of transport, such as walking and cycling (including to and from school), is one of the Council's key transport objectives and priorities.

6.2. This can only be achieved by reducing the dominance of the private vehicle. Poor air quality resulting from vehicle emissions is recognised for the damage it inflicts upon the health of the city, with nearly 10,000 Londoners dying early every year as a result (King's College London, 2015). Even more disturbing is the direct impact it is having on our children's health with evidence proving it is directly responsible for alarming rates of asthma and other respiratory illnesses in our schools (GLA, 2008). Car engines idling around schools, during drop-off and pick-up periods also contribute to poorer local air quality. The School Street proposal will have a direct impact on reducing emission levels of vehicles passing school gates when children are entering or leaving school.

6.3. Closing the streets to vehicle traffic during set hours of operation would act as a safety measure. It would reduce the risk of accidents arising from inconsiderate parking and driving endangering other motorists, cyclists and pedestrians - especially children.

6.4. Following the successful implementation and review of the first nine School Street Zones, the Council announced in November 2019 that it would carry out assessments of all primary schools in the borough, and move forward with introducing a School Street at each one, unless they opt-out.

6.5. A School Street scheme and Low Traffic Neighbourhood (LTN) were implemented under experimental traffic orders for a maximum period of 18 months, starting in November 2020, allowing people to experience and review the full impact of the measures, before consideration is given to making the schemes permanent (see Appendix 1 for locations). The delegated powers decision report for the experimental order is available at www.hackney.gov.uk/school-streets.

6.6. The experimental schemes have proven successful in achieving traffic and congestion reduction, improved road safety and a better balance between pedestrians and motor vehicle traffic, which has created a better socially distanced environment.

6.7. Impact of the Coronavirus Pandemic

6.8. The experimental schemes were implemented in the context of a global pandemic and in light of an urgent need to provide space for social distancing

in the short term, and to prevent the risk of a car-led recovery in the medium to long term.

6.9. The schemes had only been operating for a short time before the schools were closed to most pupils as part of the national lockdown from January to March 2021. This has affected the on-going monitoring and review process, especially with regard to getting comprehensive post-implementation data on enforcement and traffic volume counts. However the results of a five school School Streets pilot study in Hackney indicated a positive overall impact with a 68% average decrease in traffic levels outside of the school gates and 74% drop in emissions at the school gate.

6.10. During the experimental period of the schemes, Covid-19 restrictions changed several times on a national as well as local level. While schools remained open following March 2021, other Covid-19 restrictions were variously implemented then removed under different names (such as 'Plan B'), with impacts on social distancing requirements and with broader impacts on travel behaviour.

6.11. Evaluating schemes within this context is challenging, however, the main reasons for the scheme remain relevant.

6.12. In May 2020, the Secretary of State for Transport issued Statutory Guidance under section 18 of the Traffic Management Act 2004, which stated (among other things) that *"Local authorities in areas with high levels of public transport use should take measures to reallocate road space to people walking and cycling, both to encourage active travel and to enable social distancing during restart…. Measures should be taken as swiftly as possible, and in any event within weeks, given the urgent need to change travel habits before the restart takes full effect. None of these measures are new – they are interventions that are a standard part of the traffic management toolkit, but a step-change in their roll-out is needed to ensure a green restart. They include: … Encouraging walking and cycling to school, for example through the introduction of more 'school streets'. Pioneered in London, these are areas around schools where motor traffic is restricted at pick-up and drop-off times, during term-time. They can be effective in encouraging more walking and cycling, particularly where good facilities exist on routes to the school and where the parents, children and school are involved as part of the scheme development."*

6.13. Transport for London arrived at similar conclusions in their London Streetspace Plan, as did Hackney Council through their own analysis which was published within 'Rebuilding a Greener Hackney - Hackney's Emergency Transport Plan'.

6.14. As the course of the pandemic changed so did the Statutory Guidance, which was updated on 23 May 2020 and 13 November 2020 and 30 July 2021. As relates to School Streets, the main thrust of the guidance remains consistent with the original guidance, although with some change in language. The current (as of January 2022) version of the guidance says, in relation to

School Streets: *"None of these measures are new – they are interventions that are a standard part of the traffic management toolkit and a step-change in their roll-out continues to be needed to maintain a green recovery. They include:.. encouraging walking and cycling to school, for example, through the introduction of more 'school streets'. These are areas around schools where motor traffic is restricted at pick-up and drop-off times, during term-time. They have been effective in encouraging more walking and cycling, particularly where good facilities exist on routes to the school and where the parents, children and school are involved as part of the scheme development."*

6.15. Government advice on school travel remains to consider options to encourage walking or cycling wherever possible, and reduce the need to drive. The risk of a car-led recovery remains a possibility and road traffic has returned to pre-pandemic levels, but public transport use remains lower and is returning at a slower rate. As of the time of writing, 'Plan B' restrictions are just being lifted and office workers are being encouraged to return to offices, but we have not seen the full impact of this latest change.

6.16. Estimates made in TfL's Streetspace Guidance suggested for Hackney there could be an increase of between 80-90% in private car trips by car owning households[6].

6.17. While Government guidance on social distancing has changed and at the time of writing is not a legal requirement, Government guidance remains to "limit close contact with other people".In practice to enable people to choose to follow this guidance at the school gates, it remains relevant to provide space for parents and children to keep some distance. This benefit of the scheme may become less important over time, but as of publication of this report, it is a relevant benefit.

6.18. The proposals outlined in this report are consistent with the Council's Transport Strategy, which commits to encouraging and promoting walking and cycling, and to reducing the impact of the school journey on the local environment. It is also consistent with the advice and guidance from both the Government and the Mayor of London, including advice provided for the short term Covid crisis.

6.19. **Hackney Council's Transport Strategy 2015 - 2025**

6.20. Hackney Council's Transport Strategy sets out a coherent set of sustainable transport policies, proposals and actions that aim to further improve walking and cycling and public transport conditions and options for all residents, visitors and people who work in the borough.

6.21. The Strategy recognises that not only does transport have a critical role to play in Hackney's continuing physical regeneration, but is also a key factor in achieving other key borough priorities such as promoting transport equality and access to jobs, training and essential services, reducing obesity levels,

[6] TfL. LSP. Interim Borough Guidance.

supporting the local economy, improving air quality and reducing carbon emissions.

6.22. There are a number of clear objectives within the Strategy, including:

- **LN3:** Improving air quality - Hackney will continue to tackle poor air quality, seeking to reduce NO2 emissions to achieve the National Air Quality objective of 40mg/m3
- **LN10:** School Clean Air Zones - Hackney Council will aim to develop and secure funding for projects to improve air quality in and around the borough's schools. School Streets is one such project, with the temporary closure of roads outside schools that coincides with school opening and closing times.
- **LN20:** School Streets - Hackney will look to develop and trial School Streets proposals where roads, upon which schools are situated, are closed during certain times of the day.
- **LN15/C33:** Filtered Streets - Reducing motor traffic on residential streets. Hackney Council will continue to work with local residents and key stakeholders to identify, trial and rollout additional filtered streets schemes across the borough in order to reduce rat-running and through motor traffic.
- **C08:** Reallocation of Road Space - The Council will continue to reallocate carriageway road space from private motor vehicles to cycle infrastructure provision, whether it be cycle parking or route provision.

6.23. The Council already has about 120 modal filters within the borough and has more planned for the current and future years. Officers are also developing a Low Traffic Neighbourhood plan for expanding this across the borough.

6.24. The Council already has 38 permanent and 10 experimental School Street schemes in the borough. Therefore this recommendation is consistent with the Council's established policy and approach to School Streets.

6.25. **Mayor's Manifesto Commitments**

6.26. The schemes also align with certain manifesto commitments made by the current Mayor of Hackney:

- 'We will make it easier and more attractive to walk and cycle to school.'
- 'We will continue our school travel plan programme, cycle training and schools' air quality monitoring and introduce at least 12 School Streets by 2022.'
- 'We will implement measures to reduce road accidents especially in relation to vulnerable road users and work towards the Vision Zero target of no deaths on London's roads.'

6.27. **Mayor of London's Transport Strategy 2018**

6.28. The central aim of the strategy – the Mayor's vision – is to create a future London that is not only home to more people, but a better place for all those people to live in. It recognises that the success of London's future transport system relies on reducing Londoners' dependency on the car in favour of increased walking, cycling and public transport use. This approach will reduce health and economic inequalities, which is especially important for young children, who need to do more physical activity to stay healthy as they grow. Children can benefit the most from street closures and from safe and accessible footpath networks and other public spaces for active and independent travel and play. The implementation of School Streets in Hackney would support the long-term delivery of the Mayor's Transport Strategy (MTS) and help attain the MTS target of 'the proportion of sustainable travel mode trips by London residents will reach 80% by 2041.'

6.29. **Vision Zero** The Mayor's Transport Strategy also commits to delivering a 'Vision Zero' approach in London to make its streets safer for all. Minimising road danger is fundamental to the creation of streets where everyone feels safe walking, cycling and using public transport. This radical change to how London approaches road danger will aim for no one to be killed in or by a London bus by 2030, and for all deaths and serious injuries from road collisions to be eliminated from London's streets by 2041.

6.30. **'Rebuilding a Greener Hackney' - Hackney Emergency Transport Plan**

6.31. Hackney's Emergency Transport Plan (ETP) outlines the borough's response to the global Covid 19 pandemic. The response is consistent with Hackney's existing Transport Strategy. Government advice in 2020 was to avoid public transport to reduce wherever possible the risk of virus transmission. This created a risk that if parents switched from public transport to the car for the school run there would be increased congestion and pollution outside of school gates. This would conflict with the need to provide additional space for social distancing by widening footways or using part of the carriageway.

6.32. The ETP was designed to prevent the potential damaging effects of a car-led recovery from the pandemic through helping with social distancing for pedestrians and cyclists outside school gates and supporting a switch to walking and cycling to school instead of private car use. It can be found here: https://hackney.gov.uk/rebuilding-a-greener-hackney.

6.33. Hackney committed to swiftly introducing 40 School Streets, being implemented in time for the school return in September 2020. This is an acceleration of the commitment to roll out School Streets across the borough over the life of the Transport Strategy to 2025.

6.34. **Department for Transport Statutory Guidance and Transport for London Streetspace Guidance - May 2020**

6.35. Hackney's Covid response was in line with specific guidance from the London Mayor and national guidance. Relevant to this report is TfL's 'London Streetspace Plan – Interim Guidance to Boroughs', which recommends TfL working with London boroughs to transform London's streets by: "Accelerating delivery of low traffic neighbourhoods and School Streets by working with boroughs to reduce through traffic on residential streets, to further enable more people to walk and cycle safely as part of their daily routine".

6.36. It also included Appendix 8 Supplementary Guidance on School Streets, which was designed specifically to support boroughs with the rapid delivery of School Streets across London.

6.37. The Government's statutory guidance on transport network management issued in May 2020 stated: ' The government therefore expects local authorities to make significant changes to their road layouts to give more space to cyclists and pedestrians. Such changes will help embed altered behaviours and demonstrate the positive effects of active travel.' (ref DfT,2020).

6.38. In addition, in November 2020, the Department for Transport allocated an additional £175 million to Councils across England to create safe space for cycling and walking. This funding was granted to specifically support the implementation of School Streets, Low Traffic Neighbourhoods, segregated cycle lanes and pedestrian improvements.

6.39. Hackney's Mayor summed up the borough's approach by stating 'We've committed to creating 40 new School Streets, ensuring that when children return to school in September, School Streets are the norm, not the exception.'

6.40. On 31 July 2021, the Secretary of State sent a letter to local authorities updating the DfT's guidance on active travel schemes supported by Government funding. He stated that: 'if these schemes are not given that time to make a difference, then taxpayers' monies have been wasted. Schemes need time to be allowed to bed in; must be tested against more normal traffic conditions; and must be in place long enough for their benefits and disbenefits to be properly evaluated and understood.'

6.41. Since these schemes were implemented in September 2020 (including SS32 Harrington Hill Primary School), there has been a period of lockdown closing schools early in 2021 and even though they have now returned, some are still operating with staggered times and different access arrangements; they are not operating under more normal traffic conditions. It is in response to this directive that Hackney seeks to make the SS32 Harrington Hill Primary School School Streets permanent at the end of the 18 month experimental period, so as to ensure that the safety and social distancing benefits to parents/carers

and children continue. A further review of the operation of the School Street will be undertaken in approximately 12 months.

7. Equality Impacts Assessment (EQIA)

7.1. Hackney Council and its decision-makers must comply with the Public Sector Equality Duty set out in Section 149 of the Equality Act (2010), which requires us to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations by reference to people with protected characteristics. As part of our decision-making process on the proposal for these schemes, due consideration has been given to the impact of School Streets on those with the following protected characteristics: disability, pregnancy and maternity, age, religion and belief, race and ethnicity, gender, gender reassignment, sexual orientation, and marriage and civil partnership. This section has also given consideration to people experiencing or at risk of poverty. Officers have ensured that all impacts on protected characteristics have been considered at every stage of the development of this proposal. This has involved anticipating the consequences on these groups and making sure that, as far as possible, any negative consequences are eliminated or minimised and opportunities for promoting equality are maximised. The EQIA was kept under review and updated throughout the experimental period and an interim Equalities Impact Review was published in October 2021 (included as Appendix 4) in light of specific equalities considerations that had been raised or otherwise come to light up to that point during the experimental period.

7.2. The scheme is found to benefit, or have neutral impact, on all protected groups at the group level, although it is accepted that some individuals within protected groups may be negatively affected. The Council has weighed the negative impacts on certain individuals against the overall positive benefits to the groups as a whole and decided that the overall outcome is a net benefit. The Impact Assessment that follows details the Council's evidence in making these conclusions and rationale taking each protected group in turn. The Council has considered whether it would be appropriate to modify or amend the scheme to mitigate the impact on the individuals identified as experiencing negative impacts (and those like them) and this report recommends a set of mitigations.

7.3. To understand the impacts of the scheme on different groups, the Council has carefully considered comments made during the course of the experimental period and consultation as well as conducting other investigations.

7.4. As an initial step, the Council considered whether there are facilities in the Springfield area that are of relevance to any of the protected groups to assess if access to these facilities is impacted (see Figure 2).

7.5. In order to check the impacts on protected groups, reference was made to destinations known to be important to local travel of protected groups. In air quality analysis these destinations are sometimes referred to as 'sensitive

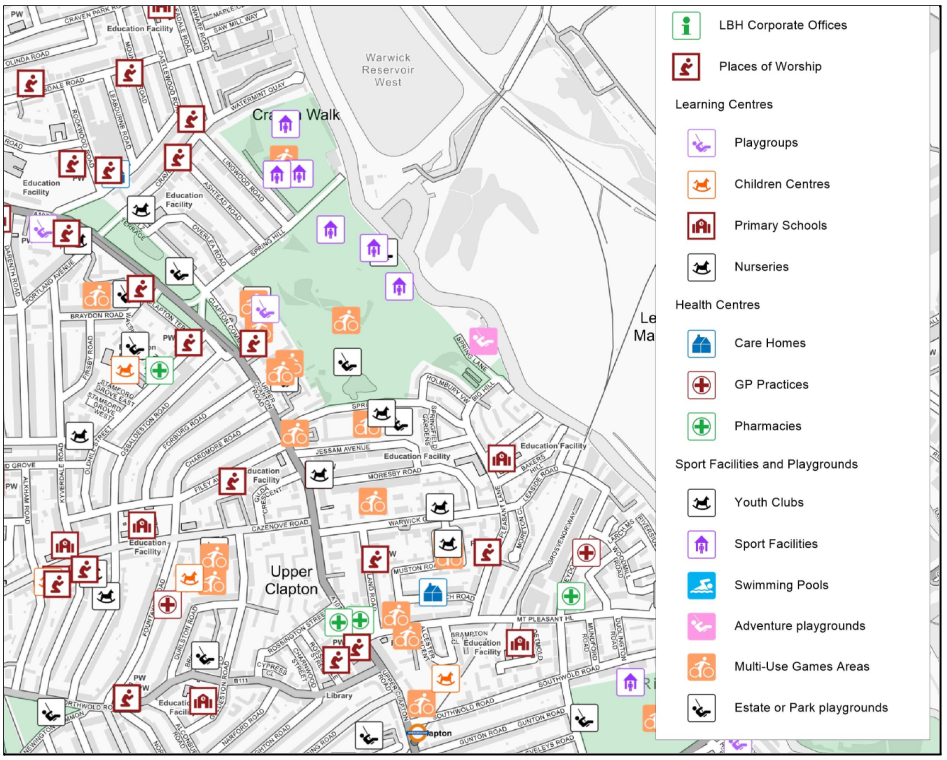
receptor' sites, but the journey from people's homes to access these sites is also important.

7.6. Certain vehicle based journeys might need to take a different route as part of the scheme. For example, buses that ferry visitors to the Kids Adventure Play[7] at the River Lee Navigation that used to get to Spring Lane via Warwick Grove and Mount Pleasant Lane will now be rerouted to Springfield.

7.7. However, as part of the proposals, all of the known important facilities remain fully accessible by foot, cycle or vehicle with the exception of Harrington Hill Primary School itself, which is the clear target of the School Street element of the scheme, and which access is permitted for Blue Badge holders.

7.8. **Figure 2** shows the places of interest in Springfield.

Figure 2 - places of interest in Springfield



7.9. **Disability**

7.10. Under the 2010 Equality Act you are a disabled person if you have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities.

7.11. While some disabled people may have impairments which are visible and immediately obvious, like using a wheelchair, other impairments like diabetes, dyslexia or mental illness are often invisible and therefore people's needs are not immediately recognisable.

[7] https://www.kids.org.uk/ (KIDS support over 13,700 disabled children, young people and their families every year by delivering over 80 services throughout England)

7.12. Disabled people encounter discrimination and disadvantage in many aspects of life:

- disabled people are more likely to experience unfair treatment at work than non-disabled people. In 2008, 19% of disabled people experienced unfair treatment at work compared to 13% non-disabled people
- around a third of disabled people experience difficulties accessing public, commercial and leisure goods and services
- 20% of households with at least one disabled person live in poverty compared to 16% of households with no disabled people
- 46% of disabled people are in employment, compared with 76.2% of non-disabled people
- around a fifth of disabled people report having difficulties accessing transport
- one in three households with a disabled person still live in accommodation that is not classed as decent

7.13. The Equality Act also protects people who are caring for a disabled child or relative as they will be protected by virtue of their association with a disabled person.

7.14. Hackney has lower than average rates of residents who identify as having a disability. In August 2019, 4,157 were in receipt of Disability Living Allowance and 3,273 were in receipt of Attendance Allowance. In October 2019, 9,760 people were entitled to Personal Independence Payments.[8]

7.15. Another measure of disability is the percentage of residents who are economically inactive because of being long term sick or disabled is which is 5.2% in Hackney as a whole compared to 3.7% in London. In the 2011 census 14.6% of Hackney respondents said they had a long-term illness that limited their daily activities in some way, compared with 13.% for London and 17.9% for England and Wales.

7.16. Hackney's own research indicates that just over 35,000 identify themselves as disabled or with a long term limiting illness. People from an Asian, Black or other ethnic background and older people are more likely to identify themselves as disabled.

7.17. **Table 8** shows the percentages of people suffering from long term illness or disability in the Springfield area compared to LB Hackney.

[8] Department for Work and Pensions, StatXplore, August 2019. Note: there might be some duplication in the numbers as people transition from receiving Disability Living Allowance to Personal Independence Payments.

Table 8: Disability in the Springfield and Leabridge wards

	Springfield	Hackney	London	England
Very Good Health	57.8%	52.2%	50.5%	47.2%
Good Health	26.4%	30.7%	33.3%	34.2%
Fair Health	10.2%	10.9%	11.2%	13.1%
Bad Health	4.1%	4.5%	3.7%	4.2%
Very Bad Health	1.5%	1.7%	1.2%	1.2%

7.18. The main modes of transport used by disabled Londoners at least once a week are walking, bus, car as a passenger and car as a driver. **Table 9** shows the proportion of disabled Londoners and the type of transport they take at least once a week.

Table 9: Proportion of disabled Londoners and the type of transport they use (source: TfL)

Proportion of disabled Londoners and the type of transport used at least once a week (in percentages) - Children under 5 not included (2016/17)					
Category	**Total**	**Age 16 - 25**	**Age 65+**	**Non Disabled all**	**Non Disabled 65+**
Base	1729	789	863	15831	1828
Walking	81	88	70	96	95
Bus	58	4	48	60	72
Car (as passenger)	42	40	41	45	41
Car as driver	24	26	25	39	52
Tube	21	30	13	43	35
National Rail	9	12	5	17	15
Overground	7	10	3	12	8
PHV - minicab	10	12	8	10	4
Taxi - black cab	3	3	3	2	2
DLR	3	5	2	5	1
Tram	2	3	1	2	2
Motorbike	-	1	-	1	1
Any public transport	61	69	52	74	78

7.19. The TfL data in table 9 shows that walking (which includes travelling on the pavement with a mobility aid or wheelchair), is the mode of transport disabled people use the most, with 81% indicating that they walk at least once a week. After that, bus travel (58%) is the most frequently used mode of transport, and after that car travel as passenger(42%) and driver (24%). It is important to note that multiple answers were possible.

7.20. There are 5,664 individuals in Hackney with companion e - Badges (blue badges), which is around 3.5%of the total residential population and 14% of disabled people. The latter figure is lower than the approximately 18.5% in London as a whole and around 20% for England. The figure for England is also around 20%. Some 86% of disabled residents in Hackney do not have a companion e - badge parking permit.

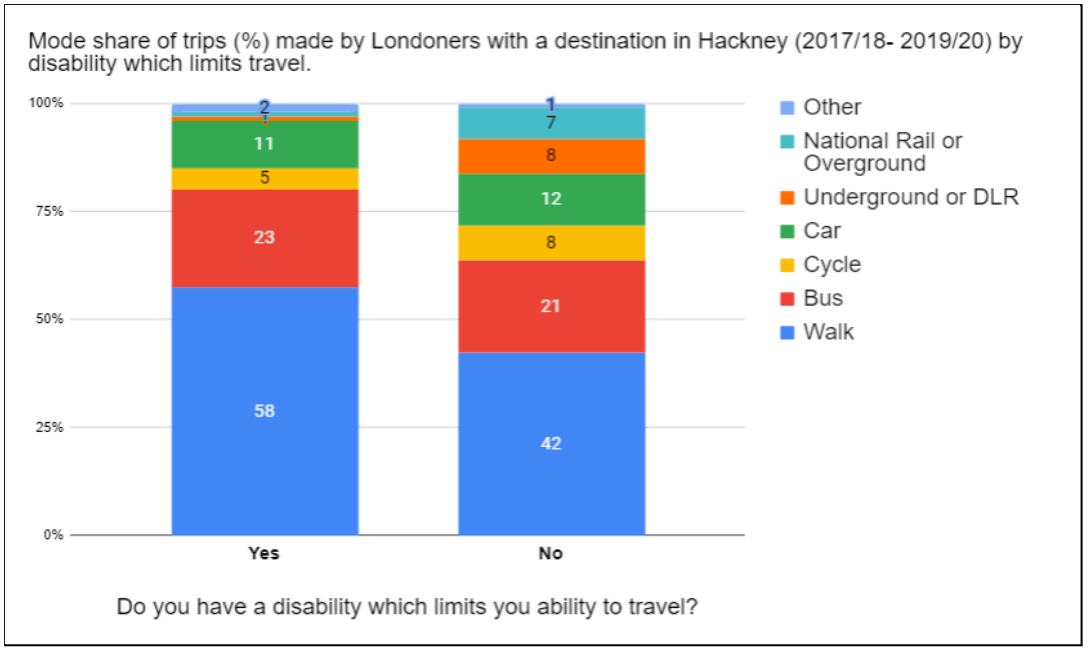
7.21. Other mobility impaired people in Hackney do not have their own car but rely on subsidised car-based Community Transport Services. One of the main schemes by which this happens is Taxicard which is a London-wide service providing subsidised London taxis, jointly funded by TfL and London boroughs, and administered by London Councils. There are currently 2,529 active Taxicard users **i**n Hackney.

7.22. The Wheels for Wellbeing annual survey[9] shows that 72% of disabled cyclists use their bike as a mobility aid, and 75% found cycling easier than walking. Survey results also show that 24% of disabled cyclists bike for work or to commute to work and many found that cycling improves their mental and physical health. Inaccessible cycle infrastructure was found to be the biggest barrier to cycling. The infrastructure introduced by this scheme which reduces traffic within the LTN will benefit disabled cyclists and could potentially encourage people with disabilities to try cycling, if their disability allows.

7.23. Analysis based on the London Travel Demand Survey for 2019/20 shows that 7% of trips originating in Hackney are made by someone who has a mental or physical disability affecting daily travel (including old age). Mode split for these trips is shown on **Figure 3**.

[9] Wheels for wellbeing annual survey 2018:
https://wheelsforwellbeing.org.uk/wpcontent/uploads/2019/04/Survey-report-FINAL.pdf

Figure 3: Mode share of trips made by Londoners with a destination in Hackney by disability which limits travel



7.24. When comparing to the LTDS mode split of trips made by those with a disability in Hackney it is perhaps counterintuitive that those with a disability are much more likely to walk compared to those without disabilities (58% of trips by disabled people compared to 42% of those without a disability which affects daily travel).

7.25. It is also interesting to note that car use by disabled people is slightly lower than by non-disabled people (making up 11% and 12% respectively of trips taken by the two groups). Disabled people are relatively more dependent on buses (23% versus 21%) and slightly less likely to cycle (5% of trips compared to 8% for non-disabled people in Hackney).

7.26. People with disabilities who rely on motor vehicles may suffer to a greater degree from any increases in journey times (and for a variety of reasons) as compared to people without disabilities. Longer journey times have negative impacts on disabled people due to:

- Increased travel times which lead to travel becoming more exhausting, expensive, complicated or difficult and may require earlier starts for medical appointments and carers needing to get clients up earlier with overall longer days and more stress.
- Prolonged travel times which increase the pain suffered by disabled people when sitting in vehicles such as arthritis sufferers.
- Prolonged travel times for visitors who provide care and support to disabled people.
- Increased costs (whether for petrol or cab fares) for people with disabilities who are more likely to have lower incomes with these costs, therefore, representing a greater proportion of their available money.

7.27. Furthermore, LTNs in general can have both positive and negative impacts for disabled people, and that sometimes disabled people cannot benefit from the positives because of other pre-existing environmental conditions (i.e. poor pavement quality making it harder to walk with a mobility aid).

7.28. No changes to designated blue badge parking spaces have been made as a result of this scheme.

7.29. It is acknowledged that not every person with a disability who relies on motor vehicles holds a Blue Badge, but may sometimes be a passenger either in someone else's private vehicle, or a Taxi (some but not all will use the Taxicard scheme) or a Private Hire Vehicle.

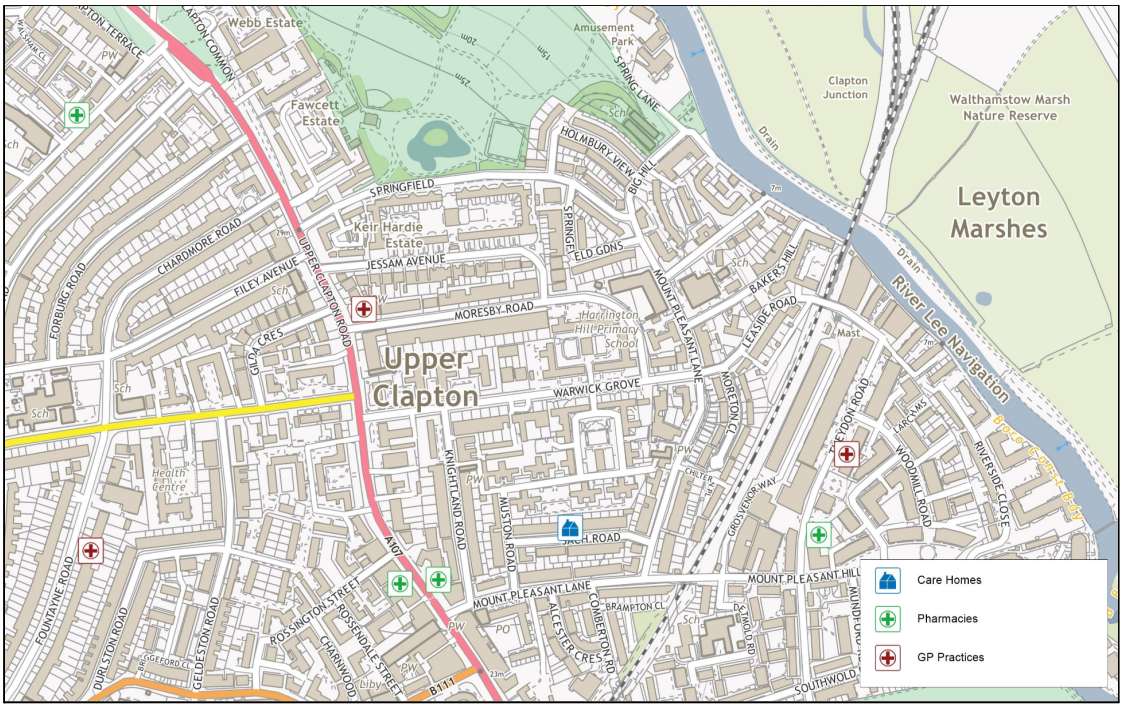
7.30. Furthermore, it is recognised that residents with a disability may rely on motor vehicle journeys made by others, such as carers, NHS, and social services and others and these journeys may become more indirect due to restrictions on through traffic.

7.31. Emergency vehicles will still be able to access the kerbside. Taxi/PHV will also be able to access the kerbside, loading bays, Blue Badge Holder bays or other locations, to pick-up and drop off passengers with disabilities at all times outside of the School Street operating hours, which are limited to 2 hrs per day, Monday to Friday, term time only.

7.32. Buses provide a fully accessible form of public transport which are used by 58% of disabled people across London. No bus routes have been diverted as a result of this scheme.

7.33. There are three important health care facilities in the Mount Pleasant area that could be important for people with disabilities, including The Clapton Surgery, Health Medical Centre and Nonoy Capina Care Home as shown on **Figure 4.**

Figure 4 - Health Centres in the Mount Pleasant area



7.34. Emergency service vehicles, such as ambulances and fire engines are supported by the scheme as they can pass through all the traffic filters.

7.35. Access to these facilities is still available but may take longer than before in some cases.

7.36. Access to all properties is maintained at all times outside of the School Street operating hours, which are limited to 2 hrs per day, Monday to Friday, term time only. While certain social care and other medical home visits may take place during these hours, the School Street zone is limited in size and the furthest property is less than 300m from the zone boundary and less than the distance to the nearest bus stop. Carers or others with mobility impairments that require regular access could be eligible for the Blue Badge exemption.

7.37. Hackney's enforcement policy allows for emergency journeys to be undertaken through the LTN filters/traffic filter. Thus, in case of an emergency visit, whether an emergency Doctor, social care worker or other clinician would be able to traverse the restrictions and appeal a PCN through the Council's system.

7.38. **Access for local disabled residents and visitors**

7.39. The scheme maintains access to all properties at all times except for the properties within the School Streets zone during the School Street operating hours, which are limited to 2 hrs per day, Monday to Friday, term time only.

7.40. The School Street zone directly affects residents living within 200 properties that are inside the zone. While these residents are eligible for an exemption for themselves, regular visitors, and carers, other irregular visitors, taxis, deliveries or other vehicles attending their property are not exempt. This represents an inconvenience that impacts disabled people who rely on vehicles more than non-disabled residents. This impact is mitigated by the restrictions being limited in time, to only 2 hours per day, Monday to Friday and term time only. The number of mobility impaired residents directly affected by the scheme in this way is estimated to be low. This is because the overall number of properties affected is low (under 200), and the number of residents living within that area who are disabled and reliant on motor vehicles will be a proportion of the total number of residents (as described earlier in this section) and therefore the number of disabled residents, living within the School Streets zone and reliant on motor vehicles is estimated to be less than 100.

7.41. As mentioned, the impact on access for disabled residents to their properties within the School Street schemes, is mitigated by way of the exemption policy which permits them to register their vehicle or carers' vehicles for exemption. Furthermore, Blue Badge holders who require access to an address within the zones as visitors, can also apply for the exemption. However, Blue Badge holders who do not register in advance or are using an unregistered vehicle may at times be unable to enter during the times of operation.

7.42. For those with limited mobility who have needed to access a property within the zone during the restricted times, and who have not registered for an exemption, the maximum walking distance from the furthest address in the zone to the edge of the zone is less than 300 metres and is shorter than the distance to the nearest bus stop.

7.43. **Access to Harrington Hill Primary School:** Prior to the scheme launch, discussions were held with Hackney Education, who provide school transport for disabled pupils, to mitigate the impact of the schemes on their journey times and provide an exemption to a School Street where no other alternatives are feasible. This also included taxis and private hire vehicles operating the service on behalf of Hackney Education. These vehicles then have access at all times both to the pupils' home address and their school if these are located inside a School Street zone.

7.44. Exemptions can also be granted to school staff and parents, who have a Blue Badge for themselves or their children, so they can enter the zone to park or access the school car park.

7.45. **Access to Side-by-Side School:** During the experimental period, concerns had been raised by Side by Side SEND School and parents of pupils attending the school. These concerns and the Council's response to them are detailed in the 'stakeholder consultation' sub-section of this report. A legal case was brought against Hackney Council on behalf of two disabled children, who challenged the validity of two Experimental Traffic Orders (ETOs) described in this report. A legal case SM v LB Hackney' was brought to the

High Court, on the grounds that the two pupils had been severely prejudiced by increased car journey times to and from the school.

7.46. The applicants argued there had been a failure to discharge the public sector equality duty, failure to consult and breach of article 8 or article 14 (read with article 8) of the European Convention on Human Rights (ECHR).

7.47. Hackney argued that it had 'properly discharged its duty to have 'due regard' to the matters specified in section 149 of the Equality Act 2010; that it was under no obligation to consult more widely than it did prior to making the ETOs; and that there was no interference, or alternatively a justified interference, with the applicants' article 8 rights and no violation of their rights under article 14 read with article 8'.

7.48. The ground of ‘a failure to discharge the public sector equality duty’, was dismissed by the Judge for the reason that Hackney had adequately performed its duty to carefully consider the impact on those with protected characteristics. This was despite that initially this did not include the impact on a particular sub-cohort of disabled children who could be adversely impacted by increased journey times, which was then included in ongoing monitoring and assessment. With regards to ground of ‘failure to consult’, it was concluded that it would not be irrational for Hackney to exclude Side by Side School from the list of regulation 6 bodies it was thought “appropriate to consult”, given the consultation with Interlink, which was a more natural candidate as a representative of members of the Orthodox Jewish community living in the area and likely to be affected by the ETOs. Notwithstanding, Hackney held a video discussion with Side by Side School staff. With regards to the third ground of breach of ‘ECHR article 8, or article 8 read with article 14’, the judge concluded that ‘if the ETOs were quashed, not just the applicants but others without special needs or any disability would once again be able to make rat runs through the back streets south of Mount Pleasant Lane and to drive through the barrier at the northern end of it. 'That would dilute and, indeed, partially defeat the impact of the ETOs and reduce the benefits they are expected to deliver’.

7.49. The interim Equalities Impact Review considered a number of potential mitigation measures (listed below), concluding that they should be kept under review for the remainder of the experimental period. The interim Equalities Impact Review concluded that it was not necessary to consider further modification of the ETOs or any amendment of the existing exemption application criteria in relation to pupils of Side by Side School during the experimental period, but that a final decision on mitigations would correspond with the decision to make permanent (or not) the scheme. However, the review also concluded that there may be a disproportionate impact on a subset of pupils attending Side by Side School, and there may be a case for considering granting special exemptions to these pupils.

7.50. This report reconsiders whether it would be necessary to implement any of the mitigation measures that were initially considered in the interim Equalities Impact Review, in light of recent evidence from continued monitoring. This will

inform the Council's decision on whether or not to make the schemes permanent, with or without changes.

7.51. The following potential mitigation measures have been reconsidered:

(a) Removal of some parking spaces on Springfield to create passing places for vehicles;

(b) Exempting school transport vehicles from the LTN restrictions on Mount Pleasant Lane;

(c) Exempting private vehicles, carrying pupils to Side by Side School, from the School Street and LTN restrictions on Mount Pleasant Lane;

(d) Extending or modifying the existing exemption criteria to include private vehicles carrying pupils to Side by Side School whose journeys originate from just southeast of the restrictions on Mount Pleasant Lane.

7.52. The following investigations were conducted to fully understand the impact of the schemes on these pupils, and inform the Council's decision on whether it is necessary to implement any of the mitigating measures described above:

(a) Monitoring the journey times in real time for the journeys to school undertaken by the pupils identified in 'SM v LB Hackney' using journey mapping software

(b) A series of Automatic Traffic Counts (ATC) - detailed in section 4 of this report

(c) A series of site visits for observation and manual traffic counts

(d) Review of the existing exemptions policy and procedure

(e) Correspondence with local authority school transport operators.

7.53. The results of these investigations and summary of mitigation measures can be found in Table 15.

7.54. **Results of the journey time monitoring**

7.55. Officers conducted journey time monitoring (see Appendix 4) to assess whether school transport vehicles using Springfield to get to Big Hill, where Side by Side school is located, were experiencing increased journey times. The interim Equalities Impact Review concluded that the difference in journey times for vehicles using Springfield was minimal. Subsequent journey time monitoring in February 2022 shows negligible change to the average journey times of vehicles using Springfield to get to Big Hill, and does not suggest vehicles are being delayed.

7.56. Officers have also continued to engage with the local authority SEND transport providers for both Hackney and Haringey. On three occasions during the experimental period, Officers had asked the SEND transport providers to provide an update on whether the SEND buses attending Side by Side School were experiencing any increased journey times or delays when using Springfield. As of February 2022, operators from both local authorities have consistently reported that they have not experienced increased journey times arising from the diversion of their route to Side by Side school from Mt Pleasant Lane to Springfield.

7.57. **Results of the traffic investigations**

7.58. Officers have investigated the assertion that the ETOs have created hyper-local traffic delays on Springfield because a) traffic has increased on Springfield as a result of the ETOs, and b) it is difficult for two vehicles travelling in opposite directions to pass each other (especially larger vehicles). This involved conducting automatic traffic count (ATC) monitoring in November/December 2020, May 2021, and February 2022, and manual traffic counts in December 2020 and March 2021, supplemented with Officer site observations and reports from school transport operators (who are using Springfield with larger vehicles).

7.59. The results of this monitoring indicate that average traffic volumes had slightly increased on Springfield between November 2020 and February 2022, but remained relatively low at 2.2 vehicles per minute, which would normally be considered insufficient to cause congestion concerns. However, the Council accepts the possibility that hyper-local congestion on urban roads is possible even with low traffic volumes, due to events such as obstructions caused by loading vehicles or other temporary obstructions, which could disproportionately impact pupils whose journey originates from further away (see Appendix 4). However, the Council's existing exemptions policy can deal with such instances.

7.60. Additional Officer site observations were conducted in February 2022 to monitor traffic congestion on Springfield, which found that vehicles were still able to pass one another without delay.

7.61. **Review of existing exemptions policy and procedure**

7.62. Journeys to Side by Side School originating from east of the school are not possible because transport links in this direction are severed by the River Lea. Journeys from immediately south of the school would have relied more on using Mount Pleasant Lane and turning right onto Big Hill prior to the implementation of the two ETOs. Such journeys may be disproportionately impacted by the School Street and LTN restrictions on Mount Pleasant Lane than journeys from the north and west.

7.63. The Council has existing systems in place for dealing with requests for special exemptions from School Streets on a case by case basis and to ensure that travel to school by SEND pupils in the borough is not significantly negatively

impacted by the restrictions. These existing systems are suitable to consider the journeys of pupils and families of Side by Side school.

7.64. The option of exempting school transport vehicles from using Mount Pleasant Lane will be retained and can be implemented in a responsive manner should the need arise at a future date.

7.65. **Engagement with Disability Community**

7.66. Hackney has introduced a number of LTNs since May 2020 on an experimental basis while encouraging residents to have their say online or by sending written comments to the Council during a full eighteen month period. Some people (including non disabled) have interpreted this as being done without consultation. In fact it offers an advantage in that it allows those who find it hard to interpret plans and drawings to make a judgement based on their knowledge and experience of how the scheme actually works in real-world conditions. It is acknowledged that this is a variation on the methods used pre-Covid, in which extensive consultation preceded a permanent decision using a design based on predicted traffic impacts. It is also clear that many people with disabilities feel that other people are speaking for them; this is discussed in the Transport For All's Pave the Way report (https://www.transportforall.org.uk/).

7.67. Local disability groups were contacted about the scheme but no feedback was received as a result of these contacts. Officers have used feedback given to other schemes to inform the scheme, for example Age UK and Disability Backup provided feedback to the Hackney Transport Strategy.

7.68. Feedback used also includes policy positions by organisations such as the RNIB and research such as the 'Pave the Way' report by Transport for All. These experiences and insights have been useful for project officers not only to adapt the designs, but also improve the planned communication activities that are part of the proposals.

7.69. The 'Pave the Way' report outlines several experiences of disabled people with the introduction of LTNs, the communication surrounding these interventions and the impacts on a spectrum of disabled people. The report provides valuable insights such as ensuring that interventions are communicated in a proper way and that changes are announced well in advance so that road users, such as taxi services, can adapt to the new routes.

7.70. However, consideration has been given to the impact on disabled residents living within the School Street Zones (including SEND pupils), and disabled visitors to the area.

7.71. **Disability Summary:** The aims of the scheme of reducing pollution, reducing traffic, and reducing road danger are of critical importance to

disabled people, who are among the worst impacted by increased pollution levels and the effects of climate change.

7.72. The main modes of transport used by disabled Londoners at least once a week are walking (78%), bus (55%), car as a passenger (44%) and car as a driver (24%), which also means that the scheme will benefit a significant proportion of disabled residents who walk or take public transport as a mode of transport.

7.73. **Pregnancy and maternity**

7.74. The positive benefits of reducing the dominance of motor vehicles would have benefited the most vulnerable road users, including mothers and children who disproportionately suffer the harmful effects of air pollution. Prams and pushchairs put children at the level of exhaust fumes when navigating the streets. Air pollution has been linked to low birth weight and underdeveloped lung capacity in children, as well as higher incidences of lung conditions such as asthma. School Street schemes are important in achieving the aims of reducing air pollution, which would have had a positive impact on mothers and children.

7.75. Encouraging children to be more active on their school journey by walking, scooting or cycling and reducing the use of the car is an important tool in combating childhood obesity.

7.76. Childcaring may not leave much time for exercising so active travel with your children on the school journey is one of the easiest and most time-efficient physical activities to undertake. Two 10 minute periods of brisk walking and cycling a day is sufficient to get the level of physical activity recommended by the Government to avoid the greatest health risks associated with inactivity.

7.77. Access to local GP Surgeries and health centres in the LTN and in the School Street zone is important to all residents including pregnant women and young children.There would be minimal impact on the services provided to pregnant women or new mothers by health and community workers, as they would be able to access any property within the zone via a short journey on foot, which should still be achievable with the necessary equipment required for midwives to carry out their roles. The likelihood of an emergency situation where a patient was attended by a midwife, but not an emergency vehicle at their home during a restricted time, is very low. In the case of an emergency, this can be handled through the PCN appeals process.

7.78. The positive benefits of reducing the dominance of motor vehicles benefits the most vulnerable road users, including mothers and children who disproportionately suffer the harmful effects of air pollution. Prams and pushchairs put children at the level of exhaust fumes when navigating the streets. Air pollution has been linked to low birth weight and underdeveloped lung capacity in children, as well as higher incidences of lung conditions such as asthma. Overall, there is a reduction in vehicle use and air pollution in the area.

7.79. **Age**

7.80. Consideration has been given to the impact of these proposals in terms of age. The scheme is very relevant to all age groups, but in particular attention has been paid to older people and young children. A summary of the impact on Age can be found in Table 15.

7.81. Hackney's population is growing rapidly; at the present rate of growth the population will reach 317,000, a growth of 43,000, by 2033. Hackney is a young borough. Some 50% of Hackney's population is aged between 20 and 44 which is one of the highest such proportions in the country and compares to just 34% in this age group nationally and 43% in London. Springfield is home to 15807 people. It has a particularly large cohort of 20-44 year olds, and fewer people aged 45 and over. Springfield has a greater proportion of children and young adults under 20, but fewer adults aged 20 – 44.

7.82. **Table 10** shows the population by age group in Springfield.

Table 10: Population by age group in Springfield

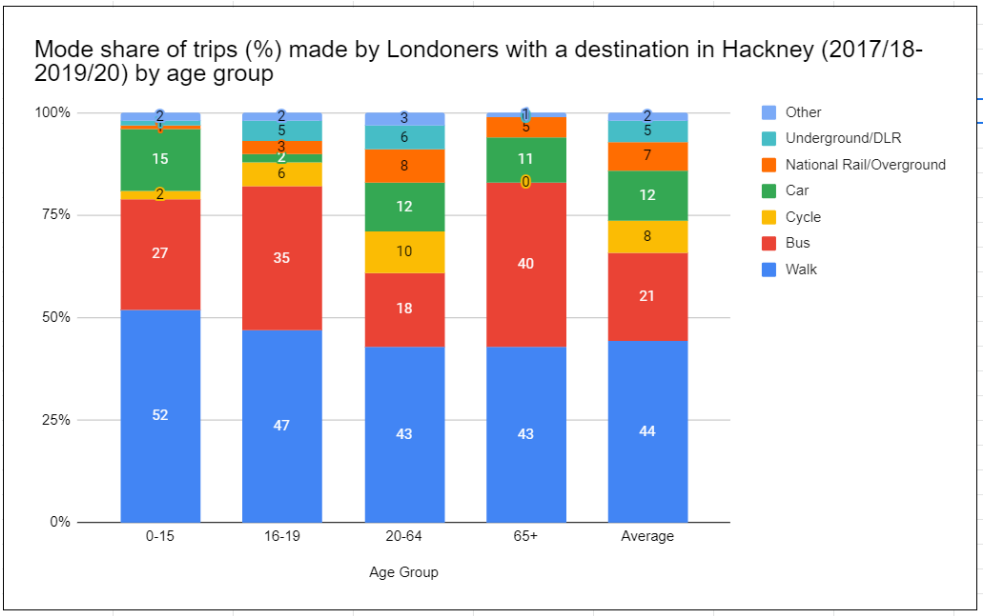
Springfield Ward population by Age Group				
Age	**Springfield**	**Hackney**	**London**	**England**
0 to 4	12.4%	7.8%	7.2%	6.3%
5 to 7	6.3%	3.9%	3.7%	3.4%
8 to 9	3.8%	2.3%	2.2%	2.2%
10 to14	8.5%	5.6%	5.6%	5.8%
15	1.7%	1.1%	1.1%	1.2%
16 to 17	2.8%	2.1%	2.3%	2.5%
18 to19	2.6%	2.2%	2.3%	2.6%
20 to 24	8.3%	8.8%	7.7%	6.8%
25 to 29	8.9%	13.7%	10.2%	6.9%
30 to 44	21.1%	27.9%	25.3%	20.6%
45 to 59	13.4%	14.4%	17%	19.4%
60 to 64	3.1%	3%	4.2%	6%
65 to 74	3.8%	3.9%	5.8%	8.6%

75 to 84	2.3%	2.3%	3.8%	5.5%
85 to 89	0.6%	0.5%	1%	1.5%
90+	0.3%	0.3%	0.5%	0.8%

7.83. The proportion of the elderly (65+) in Springfield is 7% which is equal to that of the Hackney average.

7.84. The mode share per age category of trips ending in Hackney is shown on **Figure 5**.

Figure 5: Mode share per age category of trips ending in Hackney (2019 - 20)



7.85. Those aged 65+ have a higher mode split of bus use compared to the average with about average walking and car use mode shares. There is very little cycling amongst this age group. Those aged 0 to 15 have much higher walking and bus use than the average and also slightly higher car use but lower cycling rates. Those aged 16 to 19 also have much higher usage of buses and walking than average and the lowest car use of any age group. Cycling is most popular among the working age adult population (10% of trips) but is lower in both younger and older age groups. Car use is relatively low amongst all age groups but is highest among the under 15s.

7.86. The mode share of trips by age groups ending in Hackney (2017/18 - 2019/20) is shown on **Table 11.**

Table 11: Mode share of trips made by Londoners with a destination in Hackney (2017/18- 2019/20) by age group

Mode share of trips made by Londoners with a destination in Hackney (2017/18-2019/20) by age group					
Main mode	0-15	16-19	20-64	65+	Average
Walk	52	47	43	43	44
Cycle	2	6	10	0	8
Car	15	2	12	11	12
Bus	27	35	18	40	21
Underground/ DLR	1	5	6	0	5
National Rail/ Overground	1	3	8	5	7
Other	2	2	3	1	2

7.87. Locations important to older people include local GPs, health centres and pharmacies. Access to health facilities given the operations of the LTN and School Street was described in the Disability section of this EQIA.

7.88. A reduction in traffic in the area from the implementation of the LTN and School Street will make it easier to cross the road and side streets, which can be more difficult for older people with high levels of traffic.

7.89. The scheme has ensured that local ambulances, doctors and Blue Badge Holder parking bays are not removed or changed. This is especially important for older people, who might need more frequent medical attention.

7.90. Bus services are of particular importance to older people and these have not been affected by the LTN.

7.91. It is difficult to get feedback on multiple individual schemes from all representative groups, especially those who are charities or rely on volunteers. AgeUK for example have not been able to give detailed feedback on every scheme but their feedback on previous engagements, including the Hackney Transport Strategy was used to inform project officers on individual schemes. This feedback includes removing potential conflicts between pedestrians and other road users, including cars, bicycles and micro mobility vehicles such as e-scooters.

7.92. **Recommended actions specifically to help the group protected by age**

7.93. Ensure that taxi and private hire drivers are aware that they can access closed streets for the purposes of dropping-off and picking up mobility impaired passengers, including older passengers with mobility impairments.

7.94. Continue to investigate options for allowing exemptions for very specific circumstances, such as for Taxicard holders.

7.95. This scheme positively impacts children as it is designed to create a safer and less polluted environment specifically targeting children's journeys. Children are among the most vulnerable groups in terms of road danger and pollution, and this scheme has addressed that vulnerability. Older adults are also vulnerable to road danger and air pollution and have benefited from reduced traffic dominance. However, older adults are more likely to travel by car or taxi as mobility declines with age. Older adults who live within the zone and who rely on taxis due to limited mobility may have had to either reschedule journeys to avoid the restricted times, for doorstep pickup, or walk to the edge of the zone. Pedestrian accessibility surveys have been undertaken along the walking route and any remedial action required flagged for attention.

7.96. **Religion and belief**

7.97. Consideration has been given to the impact of these proposals in terms of religion or belief. Special attention has been paid to places of faith and how these would remain accessible by all transport modes as part of the proposals.

7.98. **Table 12** shows the distribution of religion and beliefs in Springfield.

7.99. The Jewish religion has a higher percentage (32.2%) than the Hackney average of 6.3%.

Table 12: Distribution of Religion and Beliefs in Springfield

Springfield Religion and Beliefs (in percentages)			
Religion	**Springfield**	**Hackney**	**London**
Christian	29.3	38.6	48.4
Buddhist	0.5	1.2	1.0
Hindu	0.3	0.6	5.0
Jewish	32.2	6.3	1.8
Muslim	12.5	14.1	12.4
Sikh	0.7	0.8	1.5
Other Religion	0.4	0.5	0.6

No Religion	11.7	28.2	20.7
Religion Not Stated	12.4	9.6	8.5

7.100. Reducing the dominance of motor vehicles benefits all groups equally, regardless of religion.

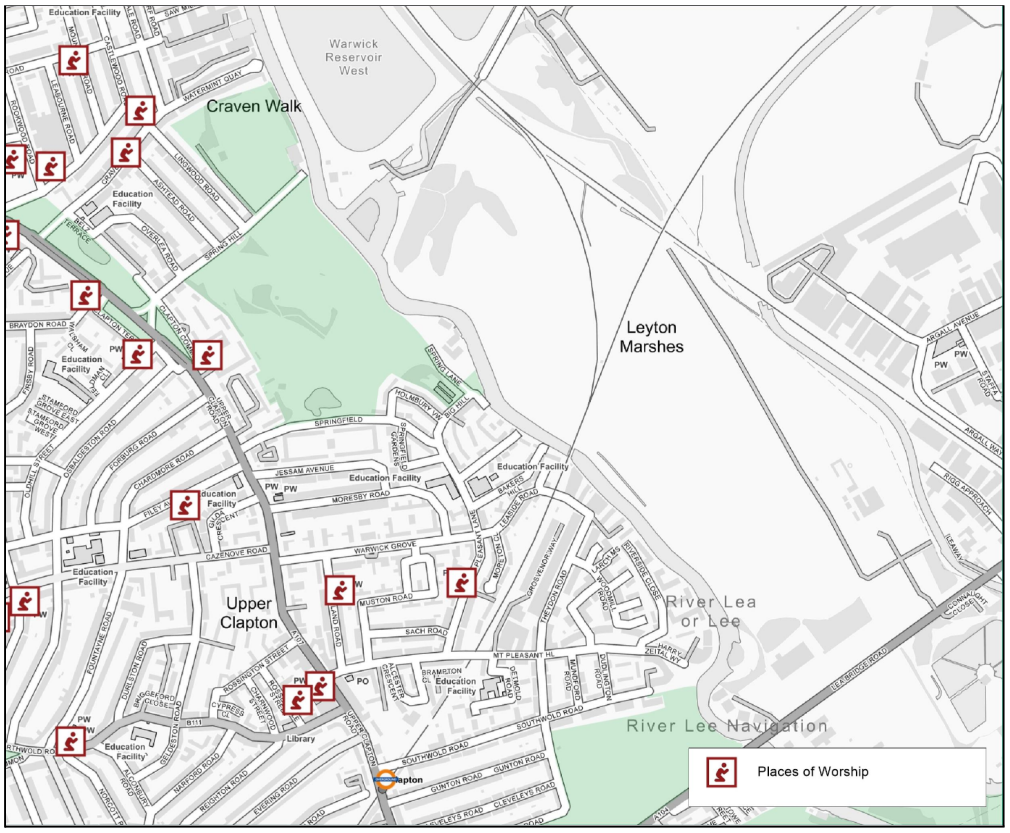
7.101. The traffic filter installed at Mount Pleasant Lane does not discriminate against any religious group, as they apply equally to all groups. There is no disproportionate impact on the Jewish, Muslim or Christian populations as residents or business owners, as the scheme does not prevent access to shops, places of faith or other cultural or religious institutions.

7.102. Routes to access these facilities might have changed as a result of the scheme, depending on the origins of the journeys.

7.103. Knightland Road Synagogue and St. Matthew's Church Of England are places of worship located at Mount Pleasant Lane to the south of Warwick Grove. Some residents wishing to visit these two places of worship may be affected by the traffic filter at Mount Pleasant Lane particularly those living to the north of the Springfield Gardens.

7.104. Places of worship in Springfield are shown on **Figure 6**.

Figure 6a: worship centres in the vicinity of the scheme



7.105. These locations will experience a positive impact of reduced traffic flows allowing worshippers to walk and cycle to their place of worship safely.

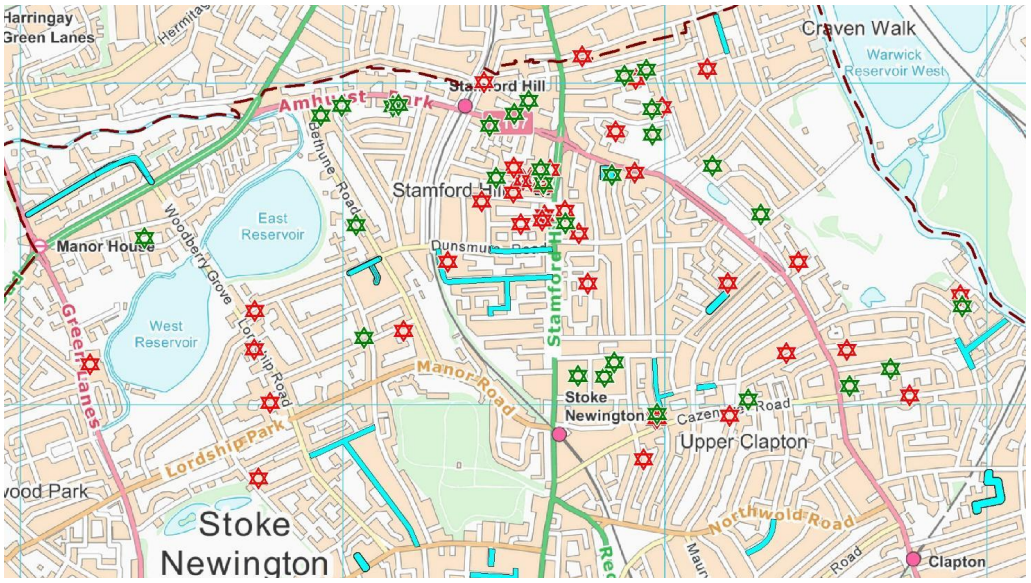
7.106. Places of worship have also been contacted as part of the wider communication strategy to enable them to submit their feedback to Hackney Council.

7.107. Consideration has been given to the impact of School Streets in terms of religion or belief. Reducing the dominance of motor vehicles has benefited all groups equally, regardless of religion and belief. The proposal in this report for a permanent School Street does not discriminate against any religious group, as they apply equally to all groups.

7.108. The extent of each School street scheme has been kept as minimal as possible in order to reduce the number of addresses within each scheme and the disruption to residents and businesses. There are locations though where places of worship fall within a School Streets scheme; people with mobility problems visiting these locations by motor vehicle can apply for a special exemption. This will enable them to get as close as possible to the entrance in their vehicle. All other visitors arriving by vehicle during the scheme operating times are required to park outside the scheme and complete their journey on foot.

7.109. Prior to implementing the School Street and LTN schemes, the Council conducted a desk-based analysis of the location of Jewish schools and community establishments to identify where there might be specific local issues to address. This impact assessment noted the presence of Side by Side School on the periphery of the School Street and LTN but that there was no direct impact on the school. No other Jewish schools or community receptors were identified in the immediate vicinity in this analysis.

Figure 6b: **Map of School Streets and Jewish Schools and Community Establishments in the Stoke Newington, Stamford Hill and Upper Clapton Area**



7.110. The impact assessment considered the demographic characteristics of the population in Springfield Ward that, similarly to other northern parts of the borough, is home to a significant Orthodox (Charedi) Jewish community. This population typically has large family groups with children attending different single-sex schools. They are therefore, in some cases, currently quite car dependent and schemes that prioritise walking and cycling over car use might not be as beneficial to this population. It is acknowledged that given these characteristics, and also for cultural reasons, behaviour change might be more difficult amongst these groups, however car dependency is not a protected characteristic in itself.

7.111. **Race and ethnicity**

7.112. The 2011 Census estimates that about 45% of Hackney's population are black and minority ethnic groups, with the largest group (around 23%) being black or black British.

7.113. **Table 13** shows the ethnic distribution of the population In Springfield.

7.114. There are proportionately more residents from other white backgrounds and fewer black residents in Springfield than the Hackney average.

Table 13: Distribution of Ethnicity in Springfield

Ethnicity in Springfield (in percentages of resident population)				
Ethnicity	Springfield	Hackney	London	England
White; English /Welsh /Scottish/ Northern Irish/ British	**35.7%**	36.2%	44.9%	79.6%
White, Irish	**1.1%**	2.1%	2.2%	1%
White; Gypsy or Irish Traveller	**0.2%**	0.2%	0.1%	0.1%
White; Other White	**20.9%**	16.2%	12.7%	4.6%
Mixed/Multiple Ethnic Groups; White and Black Caribbean	**1.6%**	2%	1.5%	0.8%
Mixed/Multiple Ethnic Groups; White and Black African	**0.7%**	1.2%	0.8%	0.3%
Mixed/Multiple Ethnic Groups; White and Asian	**0.8%**	1.2%	1.2%	0.6%
Mixed/Multiple Ethnic Groups; Other Mixed	**1.5%**	2%	1.5%	0.5%
Asian/Asian British; Indian	**3.6%**	3.1%	3.1%	2.6%

Asian/Asian British; Pakistani	**0.6%**	0.8%	2.7%	2.1%
Asian/Asian British; Bangladeshi	**1.7%**	2.5%	2.7%	0.8%
Asian/Asian British; Chinese	**0.5%**	1.4%	1.5%	0.7%
Asian/Asian British; Other Asian	**1.6%**	2.7%	2.7%	1.6%
Black/African/Caribbean/Black British; African	**9.1%**	11.4%	7%	1.8%
Black/African/Caribbean/Black British; Caribbean	**7.2%**	7.8%	4.2%	1.1%
Black/African/Caribbean/Black British; Other Black	**3.9%**	3.9%	2.1%	0.5%
Other Ethnic Group; Arab	**0.4%**	0.7%	1.3%	0.4%
Other ethnic Group; Any other Group	**9%**	4.6%	2.1%	0.6%

7.115. ***Spatial Distribution of Ethnic Groups***

7.116. In inner London, people with an ethnic minority background are minimally more likely to live on a main road or high street.

7.117. **Table 14** shows the proportions for people living on main roads or high streets versus residential streets:

Table 14: Spatial distribution of Ethnic groups

Ethnic background	Main road/high street	Residential street
White	8.1%	90.8%
Black	8.4%	90.5%
Asian	8.7%	90.1%
Mixed, Other & Arab	10.5%	87.7%

7.118. **London mode choice by ethnicity**

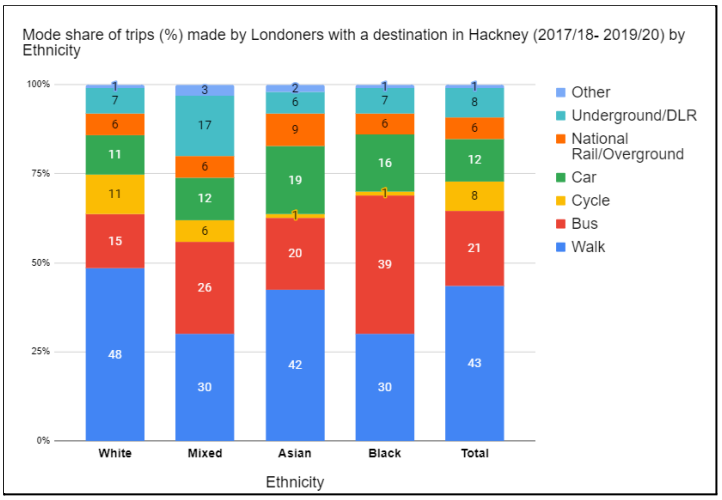
7.119. TfL data for Greater London, reported in TfLs **'Travel in London: Understanding our diverse communities 2019'** summary of research, shows that walking is the most commonly used type of transport by Black, Asian or Ethnic Minorities (BAME) Londoners.

7.120. 96% of BAME Londoners walk at least once a week, compared to 95% of white Londoners, followed by bus (65% BAME compared to 56% white).

7.121. The data also indicates that both Mixed or Multiple Ethnic groups, and Other Ethnic Groups, are much more likely to walk (48% and 45%, respectively), whilst mixed and multiple ethnic groups are more likely to cycle (7%), and Asian or Asian British are more likely to drive (6%).

7.122. The mode share by ethnic background of trips ending in Hackney is shown in **Figure 7**.

Figure 7: Mode share of trips by ethnic background of trips ending in Hackney



7.123. Based on average travel modes in journeys ending in Hackney from the 2018-19 LTDS data, Black or Black British people are much likely to use buses as a mode of transport for a trip ending or beginning in Hackney with 39% of these trips being by bus compared to the 21% average for all groups. It is 26% for the Mixed, Other and Arab ethnic Groups.

7.124. Asian people in Hackney have a higher dependency on car trips, consisting of 19% of car trips made by this group compared to the average for all ethnic groups of 12%.

7.125. This figure is 16% for Black or Black British people.

7.126. Mixed, Asian and Black people also all have a much lower level of cycling trips than people in the borough as a whole with only 1% of trips by Asian people, for example, being by bicycle compared to 8% for the borough as a whole and 11% by white people.

7.127. Walking is also less prevalent as a means of transport for Mixed/Other/Arab; Asian and Black ethnic groups. The lower use of walking as a means of transport is not as extreme as the lower cycling rates but still considerable,

for instance only 30% of Mixed/Other/Arab and Black ethnic groups' trips are by walking compared to 43% for the borough as a whole and 48% among white people. For all of the above statements, it should be noted that these percentages may not be precise due to low sample sizes.

7.128. **Scheme Impacts on Ethnicity**

7.129. Low Traffic Neighbourhood schemes are a catalyst for behaviour change.

7.130. The cost of physical inactivity is huge both in terms of physical and mental health with the cost of physical activity being estimated to cost society about £7.4bn each year.

7.131. Part of this estimated cost is the broader cost to society including NHS treatment cost for diseases associated with physical inactivity but a large part is also due to the lower quality of life experienced by populations with mental and physical illness linked to physical Inactivity. so creating a positive environment for increased active travel through travel behaviour change is a huge benefit to populations and ethnic groups.

7.132. It is admitted that Low Traffic Neighbourhoods do make certain private motorised vehicle journeys more indirect, due to the introduction of permeable filters and point closures. And this is part of the incentive to create the conditions for positive behavioural change. In the short term this is likely to have disproportionately affected those in the in ethnic groups that rely more on driving such as Asian and Black communities.

7.133. Research such as TfL's Analysis of Cycle Potential has shown that there is a greater potential for cycling for people with Culturally and Ethnically Diverse communities. Research has also shown that these groups are also disproportionately affected by Covid-19 and obesity. Therefore, a scheme improving the walking and cycling conditions in an area and enabling more social distancing in a town centre will be beneficial for all.

7.134. But to realise this potential positive impact also requires insight into and strong action to address the barriers to walking and cycling experienced by some ethnic minorities. Hackney has been at the forefront of exploring these barriers through its sponsorship of developing best practice into targeted behaviour change programmes such as its sponsorship of the London Walking and Cycling Conference which in 2020 included themes such as "Walking and cycling whilst Black: barriers, policy and progress" and in 2021 is focussed on the theme of "walking and cycling towards a fair and inclusive city".

7.135. The 2011 Census estimates that about 45% of Hackney's population are black and minority ethnic groups, with the largest group (around 23%) being black or black British. TfL data for Greater London, reported in TfLs 'Travel in London: Understanding our diverse communities 2019' summary of research,

shows that walking is the most commonly used type of transport by Black, Asian or Ethnic Minorities (BAME) Londoners (96% of BAME Londoners walk at least once a week, compared to 95% of white Londoners), followed by bus (65% BAME compared to 56% white). The data also indicates that both Mixed or Multiple Ethnic groups, and Other Ethnic Groups, are much more likely to walk (48% and 45%, respectively), whilst mixed and multiple ethnic groups are more likely to cycle (7%), and Asian or Asian British are more likely to drive (6%)[10].

7.136. School Streets may have made certain private vehicle journeys more indirect during the operational times. This may have disproportionately affected those in the ethnic groups that may have relied more on driving. The School Street proposal does not discriminate against race or ethnicity, and does not disproportionately impact residents or business owners, as the scheme does not prevent vehicle access to residential or business addresses within the School Streets zone for vehicles registered for an exemption. In addition, TfL buses are also exempt from all School Streets, so there will be no disproportionate impact on ethnic groups more likely to rely on buses.

7.137. These School Streets will continue to improve local conditions for walking and cycling, by reducing conflicts between pedestrians and motor vehicles and allocating more space for people to safely and easily walk and cycle to school. The School Street's operational times have been kept as short as possible, and the area as small as possible. Comparatively, the benefits of the School Street for people who walk, cycle, and use buses, who belong to any ethnic group, can overall be expected to greatly outweigh the negative impacts the scheme has on those who drive.

7.138. **Gender, gender reassignment, sexual orientation, and marriage and civil partnership**

7.139. The Scheme proposals apply equally to all groups, and thus they do not discriminate against any group, including gender and sexual orientation groups. That being said, it is important to identify any specific impacts on groups with these protected characteristics.

7.140. Women and people with a LGBT sexual orientation can more frequently be the subject of Anti-Social Behaviour (ASB) and crimes of a sexual nature. Under section 17 of the Crime and Disorder Act 1998, local authorities have to consider the impacts of its proposals on crime and crime prevention.

7.141. As described elsewhere, reducing traffic on streets can cause divergent impacts on the number of 'eyes on the streets'. On the one hand, vehicle traffic is decreased whilst on the other hand, enhanced cycling and walking conditions can cause more people to cycle and walk in their local neighbourhood. Together with the Community Safety Team, the impact of the

[10] TfL: Travel in London: Understanding our diverse communities 2019

proposals will continue to be monitored in terms of crime, safety and the perception of safety. Other measures may be identified through the continued monitoring of the project to improve (the perception of) safety and reduce the potential for crime. This can include altering the proposed green infrastructure or enhanced lighting in the area.

7.142. Research such as TfL's Analysis of Cycle Potential has also shown that there is a greater potential for cycling for women and research has shown that perception of cycle safety differs between women and men. Therefore, enhancing walking and cycling conditions by reducing traffic and improving road safety will be beneficial in particular for women and their cycle uptake. This will be supported by the Council's ongoing cycle training programme.

7.143. Researchers are constantly looking at patterns of street crime and violence against women, in particular. A recent study concludes, for instance that "The introduction of the Waltham Forest LTNs was associated with an overall reduction of street crime, particularly more serious crimes involving direct attacks against the person. This supports previous research (Newman 1996), and adds to evidence that LTNs can create safer, more liveable neighbourhoods.[11]

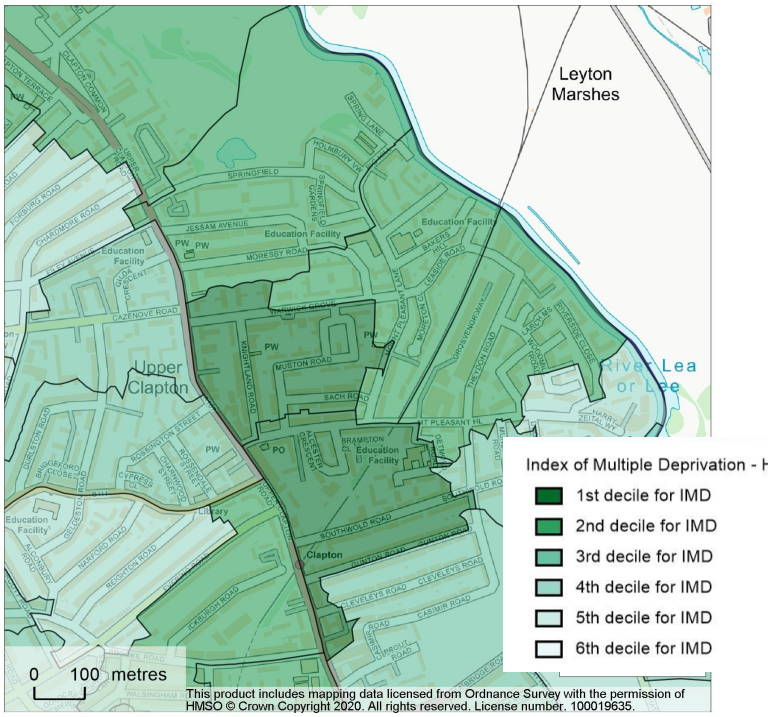
7.144. The Council will keep all LTNs and other highway schemes under review and will investigate and take appropriate action if other evidence becomes available.

7.145. **People experiencing or at risk of poverty**

7.146. Although not a protected characteristic, poverty is associated with many of them. **Figure 8** below shows how the area ranks in terms of Index of Multiple Deprivation.

[11] The Impact of Introducing a Low Traffic Neighbourhood on Street Crime, in Waltham Forest, London. https://findingspress.org/article/19414-the-impact-of-introducing-a-low-traffic-neighbourhood-on-street-crime-in-waltham-forest-london

Figure 8: Index of Multiple Deprivation



7.147. For the purpose of this report, 'poverty' will be broadly defined as not having enough money to meet basic daily needs, or not benefitting from having what most of the UK population have. Approximately 70% of households in Hackney do not own a car, compared to 44% across the whole of London[12]. While car ownership is not solely dependent on income, there is a correlation between income and car ownership. London-wide, the highest earners are almost 3 times as likely to own one car or more than the lowest earners with 78% of households on £100k or more have one or more cars vs 23% at £5k or less, 28% at £5-10k, or even 44% at £20k or less[13]. Based on these figures, measures that de-prioritise car use and generate an inconvenience to drivers could be seen to disproportionately impact those on a higher income.

7.148. Furthermore, with 70% of residents not owning a car, a significant proportion of Hackney's population relies on walking, cycling and public transport for travel and therefore benefit from this proposal regardless of income. At the latest count some 52.1% of trips were by walking or cycling.

7.149. Given that lockdown restrictions have been removed, it is important that we support the 70% of Hackney households that do not own a car to walk and cycle instead. If even a small proportion of people who used to travel by public transport switch to using private cars, the public health and road safety implications will be profound for those groups already disproportionately impacted upon by the secondary effects of motor vehicle use, including those

[12] Centre for London, Chapter 1: Car ownership, use and parking in London

[13] https://tfl.gov.uk/cdn/static/cms/documents/sfl-borough-casemaking-v1.xlsx - (accessed 5/9/20).

on low incomes, BAME groups, the elderly, and children. Therefore, the School Streets programme aims to support people experiencing, or at risk of poverty, and to mitigate the disproportionate impact a car-led recovery would have on this group.

7.150. For the purpose of this report, 'poverty' will be broadly defined as not having enough money to meet basic daily needs, or not benefitting from having what most of the UK population have. Approximately 70% of households in Hackney do not own a car, compared to 44% across the whole of London. This has been showcased in TfL's Travel in London:Understanding our diverse communities (2019).

7.151. While car ownership is not solely dependent on income, there is a correlation between income and car ownership. London-wide, the highest earners are almost 3 times as likely to own one car or more than the lowest earners, with 78% of households on £100k or more having one or more cars vs 23% at £5k or less, 28% at incomes between £5-10k. Those with incomes of between £15k and £20k have car ownership levels of 44%.[14]

7.152. Measures that de-prioritise car use and generate an inconvenience to drivers could be seen to disproportionately impact those on a higher income.

7.153. Furthermore, with 70% of residents not owning a car, a significant proportion of Hackney's population (making up 87.4% of all trips by borough residents in 2020[15]) relies on walking, cycling and public transport for travel and therefore benefits from this proposal regardless of income. At the latest count some 52.1% of trips were by walking or cycling.

7.154. Children and families attending Harrington Hill Primary School are the main beneficiaries of the scheme and 44.4% of the school community is eligible for free school meals. This figure is higher than the Hackney average, and significantly higher than the London average.

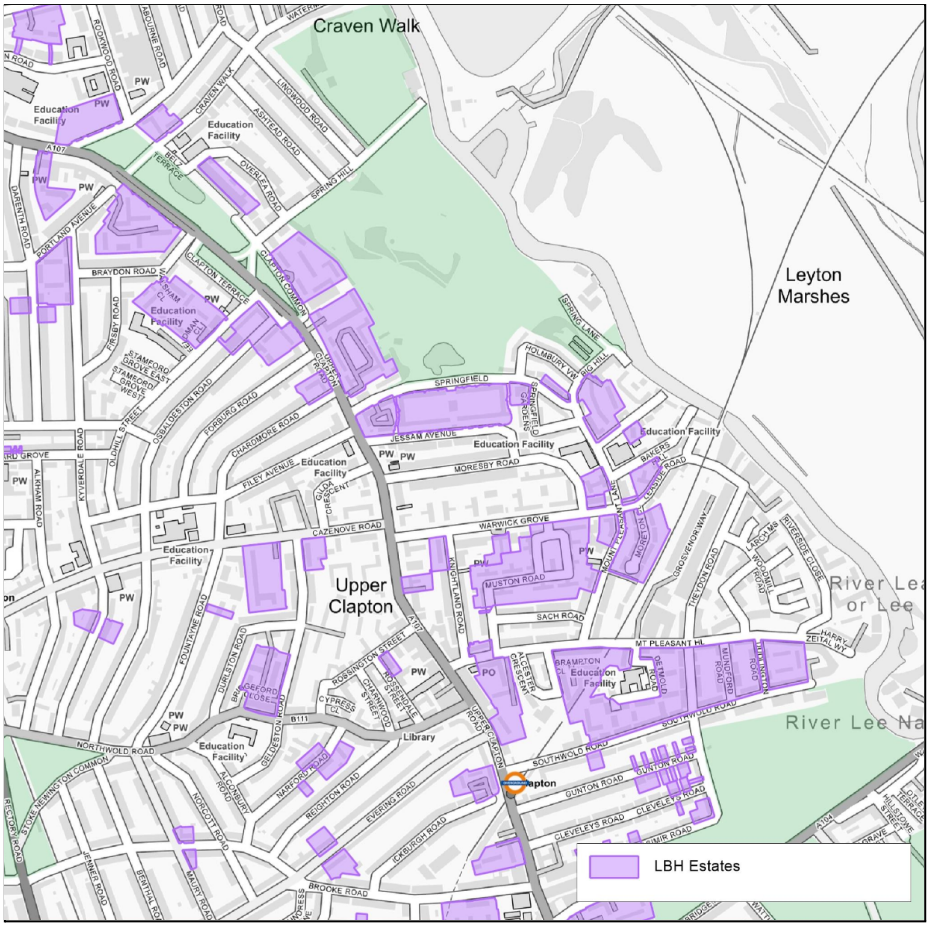
7.155. **Figure 9** indicates estates owned and operated by Hackney Housing, the Borough's largest social housing provider.

---

[14] Streetspace funding and guidance - Transport for London (tfl.gov.uk) Appendix 7 - Case-making data for boroughs accessed 1/11/21). Based on these figures, measures that de-prioritises car use and generate an inconvenience to drivers could be seen to disproportionately impact those on a higher income.

[15] LTDS 2019/20

Figure 9: Hackney Housing estates in Springfield



7.156. The map indicates large areas of social housing in the Springfield area with many estates having frontages on roads that are to benefit from a reduction of traffic. Some displacement back onto Upper Clapton Road was expected, as it was thought that vehicles were using Mount Pleasant Road to bypass traffic signals on Upper Clapton Road. However, comparing pre-pandemic DfT data from Upper Clapton Road[16] to July 2021 ATC data suggests a decrease on Upper Clapton Road from 23,398 in 2019 to 22,224 in 2021, a decrease of 5%. Therefore, some estate residents, such as those on Mount Pleasant Lane will have benefitted from traffic reduction near their home, while others such as Lea View House have seen a neutral impact as traffic has stayed at or near already low 2010 levels. Others, such as those living on Upper Clapton Road, have seen traffic levels decrease, but from a high base and this change cannot be attributed to this scheme. Therefore, in consideration of traffic levels and traffic displacement, estate residents are not disproportionately impacted by the scheme either positively or negatively compared to residents living in other types of housing.

[16] https://roadtraffic.dft.gov.uk/manualcountpoints/36668

7.157. **Equalities impact summary**

7.158. **Table 15** summarises the main equalities impacts on each of the protected groups and on balance, finds positive or neutral impacts for all groups.

Table 15: Equalities Impact Summary for the School Street and LTN traffic filter on Mount Pleasant Lane

Scheme		**School Streets**						
Age	Disability	Gender	Gender Reassignment	Race and Ethnicity	Religion and Belief	Sexual Orientation	Pregnancy and Maternity	Marriage and Civil Partnership
P	P	P	Neu	P	P	Neu	P	Neu
Key: P - Positive Impact, Neu - Neutral Impact, A- Adverse Impact								
Comments		**Age** Children and families in the area, particularly pupils walking or cycling to Harrington Hill Primary School are the main direct beneficiaries of the scheme and this relates in particular to age. This is created by a reduction in motor vehicle traffic at the school during the peak times, which has corresponding benefits in terms of air quality, walking and cycling conditions, and improved road safety, which benefits all protected groups as all require access to the same amenities. There is the potential for adverse secondary impact on young people travelling to Side-by-Side school by car, in that their route choice is reduced which could lead to longer journeys to school, which particularly impact this group due to their disabilities. On balance however, the adverse impact to children travelling to Side-by-Side is a secondary rather than direct impact and is outweighed by the positive direct impact to the many children and their families, including disabled children, travelling to Harrington Hill. Mitigations to address the adverse impact are discussed below. Similarly, as the scheme improves the environment for people walking, it is beneficial for older people and young children, who are more at risk of road danger when walking. There is some secondary adverse impact on older people who rely on motor vehicles due to their mobility, who will have longer journeys, but this is outweighed by the direct benefit of reducing road danger for this vulnerable age group. Therefore, there are some adverse impacts on certain cohorts of older and younger people, on balance, the scheme has a positive direct impact on a wider cohort of these groups that outweighs the adverse secondary impact. **Disability**						

	Road safety improvements are especially beneficial for people with disabilities to support them making local journeys and the evidence shows that more disabled people regularly walk or take public transport than rely on motor vehicles. As discussed above, there is the potential for adverse secondary impact on disabled people travelling to Side-by-Side school by car, as a result of reduced route choice which could lead to longer journeys to school, and longer journeys particularly impact this group due to their disabilities. The result of restricting route choice for pupils to and from Side by Side School is that there is a risk of an impact, however infrequent, to certain disabled children who experience detrimental impacts due to their disability. All destinations remain accessible by all modes, but the scheme has required that some journeys be rerouted. Travel to school by SEND pupils attending Side by Side School is not significantly negatively impacted by the restriction of route choice to Springfield to access the school. Other disabled people are also likely to be car dependent and may be impacted by longer journeys, or, in the case of living within the School Street zone, may be reliant on taxis, friends or other non-exempt vehicles for transport. While it is recognised that there is some adverse impact on a cohort of disabled people who rely on motor vehicles, this report shows that there are also direct benefits to people with disabilities as a group, as there are many disabled people who travel by walking or public transport that benefit from the scheme. On balance, and in light of the proposed mitigations that the overall impact of the scheme on disabled people as a group is positive, despite a small cohort of disabled people that are impacted by longer journey times. **Other groups** Data and research show that groups with protected characteristics, e.g. ethnicity or disability, are more frequently pedestrians or bus users than car passengers or drivers. But there are exceptions to this such as the slightly higher car dependency of Asian groups. In particular, women and people of Black, Asian and other non-White British communities have currently low levels of cycling and therefore higher potential for cycling, and thus benefit more from improvements to local cycling conditions that will help encourage sustainable travel. Air quality improvements in the immediate area of the scheme are beneficial to all protected groups. In particular, air quality improvements outside local primary schools and nurseries are particularly beneficial to young children and people in the maternity and pregnancy group to some extent.

7.159. **Mitigations**

7.160. The EQIA has been a live document through the experimental period of the School Street and LTN. Officers have revisited it to ensure that it is fit for purpose in light of specific equalities considerations that were raised, or came

to light, during the experimental period. As part of this process officers also gave consideration to the need for any interim modifications to the ETOs during the lifetime of their operation and if they were to be made permanent. The outcome of this process was an Interim Equalities Impact Review, which was published in full on the Council's School Streets web page (see Appendix 4), and the investigations of this review were revisited and updated in this report.

7.161. The following potential mitigation measures have been reconsidered:

7.162. **Removal of some parking spaces on Springfield to create passing places for vehicles.** Subject to the decision to implement this scheme as a permanent scheme, the Council will undertake further work to design and consult on a scheme to introduce passing places for vehicles on Springfield. This would be to mitigate the hyper-local congestion that children travelling to Side-by-Side school have reported, although it is noted that the School intends to relocate to a site not impacted by this scheme in September 2022. The proposals to introduce passing places would be subject to a review of their necessity in light of the proposed school relocation.

7.163. **Exempting school transport vehicles from the LTN restrictions on Mount Pleasant Lane.** Organised school transport vehicles will be able to register for an exemption through the Mount Pleasant Lane filter for the purpose of transporting children to Side by Side School.

7.164. **Exempting private vehicles, carrying pupils to Side by Side School, from the School Street and LTN restrictions on Mount Pleasant Lane.** This option has been considered and rejected on the grounds that the volume of vehicles this would introduce into the School Street zone outside Harrington Hill School could undermine the scheme. Given the current traffic levels outside the school gate are approximately 40 vehicles in the hour, and nearly every pupil at Side by Side School travels by motorised transport (numbered over 100), introducing an exemption for private vehicles with no upper limit could potentially double or triple traffic volumes outside Harrington Hill, during the School Streets times.

7.165. **Extending or modifying the existing exemption criteria to include private vehicles carrying pupils to Side by Side School whose journeys originate from just southeast of the restrictions on Mount Pleasant Lane.** This mitigation will be retained and the Council has updated its exemptions application process to enable requests of this nature, expected to be low, to be dealt with through the existing special exemptions policy.

7.166. Other measures have been incorporated into the scheme to mitigate against negative impacts on protected groups. These include:

- The retention of all doctor, disabled and ambulance bays in the LTN
- Taking into account emergency services feedback and ensuring that all traffic filters are navigable for emergency vehicles
- Feedback from other organisations including disability stakeholder groups has been taken into consideration

- All properties, shops and residences alike, are still accessible by vehicle
- Exempting SEND school transport buses to travel through the LTN restriction on Mount Pleasant Lane
- Consideration of very specific exemption request cases for pupils whose journey to Side by Side School originates from the south or further away
- Consideration to remove parking bays on Springfield to provide more space for vehicles to pass one another, subject to whether Side by Side School will be moving location in September 2022

7.167. **Equalities Conclusion**

7.168. The Council accepts that whilst some journeys to Side by Side School may be adversely impacted by the restrictions, the mitigating measures described above are appropriately balanced to address some of the negative impacts on this small cohort of disabled children while maintaining the traffic reduction impact from the scheme on Mount Pleasant Lane.

7.169. Balancing the positive and negative impacts, overall it is believed that the scheme will be more beneficial in terms of equalities, particularly keeping in mind the disproportionate impacts of Covid-19 on certain groups e.g. Black, Asian and other non-White British communities or older people.

7.170. The EQIA is a live document that requires continual updating and assessment. The schemes should be seen as part of a package of measures in the local area that aim to achieve the same policy goals and scheme objectives, especially in terms of promoting a modal shift towards active travel and improving local air quality.

7.171. These supporting measures include installing more residential cycle hangars, electric vehicle charging points (rapid and lamp column) and improved public realm.

7.172. To ensure that benefits are realised for all groups, the Council has a number of existing initiatives such as the ongoing cycle training programme and several publicity campaigns. To monitor the scheme and collect feedback, the Council will continue to liaise with stakeholder representatives of protected groups.

7.173. **Human Rights**

7.174. Under the Human Rights Act 1998, the Council is under a duty not to act in a way that is incompatible with any person's Convention rights. Accordingly, the order may not be made if it would give rise to a breach of a person's human rights. If a person were to be exposed to lower air quality or longer journey times as a result of the Scheme, that could constitute a breach of his or her Article 8 right to respect for his or her private life. However, it is considered that the implementation of the Scheme would constitute a

justified interference in that, for the reasons set out elsewhere in this report, it would be a proportionate means of achieving a legitimate aim.

8. Sustainability

8.1. The schemes have had a positive benefit for sustainability by reducing non-local traffic and the congestion and pollution associated with this, and creating a safer, more pleasant environment for parents and pupils travelling to Harrington Hill Primary school on foot, or by bike. The creation of safe spaces in which to socially distance has increased the confidence of parents and pupils as schools reopened after lockdown.

8.2. However, the Council is aware of concerns raised about the potential impact of the schemes on Special Educational Needs and Disability (SEND) pupil journey times, which has been considered in section 7 of this report.

9. Consultations

9.1. Consultation Process

9.2. Feedback received during the statutory consultation period is presented as common themes/issues relating to the School Street scheme and LTN scheme, which have been grouped together including Hackney's response to each.

9.3. The trial for the schemes was being implemented under an experimental traffic order (ETO) for a maximum period of 18 months. An ETO does not remove the need to consult residents and users, but instead allows them to see how the schemes work in practice before having their say. The first six months of operation is considered to be the consultation period where people can view the actual impact of the measures and respond back to the Council with their views.

9.4. The following consultation periods took place for the schemes:

- **Harrington Hill Primary School School Street (Pedestrian and Cycle Zone):** launched on 9 November 2020 with a statutory six month consultation period ending June 2021.

- **Mount Pleasant Lane Low Traffic Neighbourhood and Southwold Road banned turn at Upper Clapton Road:** launched on 28 October 2020 with a six month consultation period ending 3 May 2021.

9.5. In recommending the schemes for permanent implementation, consideration has been given to the on-line comments/objections and correspondence received during the statutory consultation periods.

9.6. The primary method of collecting data was through the online engagement platform, Commonplace[17]. This was used to gather insight from residents and interested stakeholders.

9.7. Those without online access were given the opportunity to provide their feedback offline by writing to 'Freepost Streetscene'. Respondents were also able to electronically write to streetscene.consultations@hackney.gov.uk. All emails and other correspondence arriving during this period were logged and form part of the analysis.

9.8. Feedback on the schemes was promoted by:

- Distribution of letters and maps to residents in the surrounding area (inside and outside the School Streets zones) prior to implementation
- A dedicated School Streets webpage
- Display of on-street materials e.g lamp post wraps and banners
- Emails to schools in the immediate area with information they could opt to include in newsletters and communications to parents
- Inclusion of information in the Heads Bulletin to headteachers
- Regular pieces in the Council's newspapers, Hackney Life and Hackney Today
- Posts on the Council's corporate social media channels
- Coverage in the local press

9.9. **Stakeholder Consultation**

9.10. Prior to implementing the experimental traffic order, and in line with recommendations from the Department for Transport, Streetscene officers met with a number of stakeholders.

9.11. Consultation with the Emergency Services and other stakeholders from Hackney was carried out for the LTN traffic filter at Mount Pleasant Lane.

9.12. It is noted that not all Stakeholders are able to respond to all consultations, however the Council is aware of many of the more general concerns as these are discussed across a variety of schemes over time and the principles incorporated into ongoing design work.

9.13. Emergency service vehicles have been exempted from the turning and motor vehicle restrictions.

9.14. **The Met Police**: Concerns from the MET Police included:

- Access for emergency vehicles through the LTN traffic filters
- Exception for emergency services on all turning restrictions

9.15. Emergency service vehicles have been exempted from the turning and motor vehicle restrictions.

[17] https://rebuildingagreenerhackney.commonplace.is

9.16. **London Fire Brigade (LFB):** LFB wanted to ensure the LTN traffic filters would have the minimum clearances for their vehicles to pass through without hindrances.Discussions were held with the LFB and the minimum width clearances through traffic filters were resolved.

9.17. **Waste Management Services**: Waste management services wanted to make sure that their vehicles would be exempted from the turning and motor vehicle restrictions.Discussions were held with Waste Management Services and their vehicles have been exempted from the motor vehicle and turning restrictions.

9.18. **Other Stakeholders (RNIB, Age Concern, Disability Backup)**: Not all the stakeholders responded to our stakeholder consultation for Mount Pleasant Lane LTN traffic filter. In this case, there were no responses from groups such as Age Concern, RNIB, Disability Backup, Living Streets in Hackney and London Cycling Campaign in Hackney; however, their concerns from similar schemes have been used to shape the design for this scheme.

9.19. **Side by Side School and Interlink Foundation:** Side by Side school is a Jewish SEND school located on Big Hill, north of the closure at the junction of Mt Pleasant Lane and Springfield Gardens. The Interlink Foundation is a membership organisation for Orthodox Jewish organisations.

9.20. Interlink convened two meetings, which were attended by officers, on 14 September and 26 October, prior to the implementation of the scheme. These meetings were attended by the Head and the SENCO Officer at Side by Side school and included a number of other interested parties, invited by Interlink.

9.21. The subject of exchanges at these meetings and subsequent email exchanges between the Council and the Head of Side by Side school can be found in Appendix 5, ‘a timeline of correspondence with Side by Side school.’

9.22. **Harrington Hill Primary School feedback:** The school has provided feedback on the scheme:

- ‘’We thoroughly support the introduction of School Streets at Harrington Hill and believe it has resulted in reduced congestion at the start and end of each school day. With the reduction of traffic, there is improved road safety for the school community and for families waiting outside the school gates at the start and end of each day.”

9.23. The following concern was also highlighted by the school:

- Between 5 and 10 families continue to drive up to the school entrance on Mount Pleasant Lane each day, either parking on the double yellow lines or pulling up outside the school gates and then reversing back along Mt Pleasant lane (avoiding the camera at the junction of Mount Pleasant Lane and Springfield Gardens.) This can cause momentary congestion and road safety issues.

9.24. **Ward Councillors Correspondence, Springfield Ward**

9.25. Correspondence was received from Springfield Ward Councillors prior to the implementation of the scheme.

9.26. The concerns raised by these Ward Councillors and the Council's response have been grouped thematically below.

9.27. ***Failure to engage with the public.***

9.28. **Hackney Response:** The Council has run the consultation on these School Streets schemes concurrently with their implementation under an experimental traffic order (ETO), the use which does not require pre-implementation consultation with the community. In line with the parameters of the ETO, residents were invited to have their say following the implementation of the schemes. In addition to this, the Council has engaged with organisations in the local community including Side by Side school above what is required for ETO.

9.29. ***Abuse of "emergency powers" during the Covid pandemic***

9.30. **Hackney Response:** Regarding the exercising emergency powers in the pandemic, the Council followed Statutory Guidance issued by the DfT in May 2020 to act rapidly to avoid a car-led recovery from lockdown. The Council did not use new powers, it used existing powers to implement schemes under experimental traffic orders, which allows consultation to run concurrently with the first six months of a scheme. This approach was consistent with the DfT guidance, as was the urgent need for School Streets, to help prevent a mass shift of travel habits from public transport to motor vehicles, and also to assist with the need for social distancing at the school gate.

9.31. ***Displacement of traffic on to adjacent streets, increasing journey times and slow moving vehicles***

9.32. **Hackney Response:** Traffic data comparing 2010 baseline to Automatic Traffic Counts post-scheme show a marginal increase in traffic volume on Moresby Road and Springfield, of 61 vehicles and 108 vehicles respectively over a 24 hour period. This is considered a marginal change and shows that after the scheme, traffic levels on these roads were close to 2010 levels. Upper Clapton Road saw a decrease of 5% in traffic between 2019 (pre-scheme) and 2021 (post-scheme). The Council accepts that there may be a degree of displacement onto Moresby Road and Springfield, but considers this displacement low and the benefits of the traffic reduction outside of Harrington Hill Primary School, and the overall benefits of reducing through-traffic along Harrington Hill outweigh the minor increases elsewhere.

9.33. However, regarding the impact of the recorded traffic levels on journey times and vehicle speeds, such traffic flows would normally be considered

insufficient to cause congestion concerns. However, the Council accepts the possibility that hyper-local congestion on urban roads is possible even with low traffic volumes, due to events such as obstructions caused by loading vehicles or other temporary obstructions, which could disproportionately impact pupils whose journey originates from further away (see Appendix 4).

9.34. Evidence of congestion has been assessed using the traffic speeds recorded by ATCs, which showed that over 7 days in February 2022, 99.85% of vehicles on Springfield were travelling at greater than 5mph, suggesting that widespread gridlock was not occurring. In addition, Officer site observations on Springfield have shown that on all but one occasion over the course of 9 visits during the experimental period, empty on-street parking bays allowed for vehicles to pull in and out and smooth passing of vehicles.

9.35. ***The scheme will make streets more dangerous, not safer, for cyclists and pedestrians***

9.36. **Hackney Response:** There were two 'slight' traffic incidents on Mount Pleasant Lane between 2015-2019. Verified casualty data from 2021 is not available as of the time of writing, however, no traffic casualties have been reported to the Council in the vicinity of the scheme. The scheme has shown a reduction in vehicles outside of the school gates of Harrington Hill and reduced motor traffic volumes are usually associated with reduction in road danger. Hackney has one of the highest pedestrian casualty rates in London. Reducing the number of vehicles on our streets will increase safety for cyclists and pedestrians and School Street schemes have been shown to generally increase the number of parents and pupils travelling to school by these modes (the number of children cycling to school increased by 51% across the first 4 School Streets). Mode of Travel data collected from Harrington Hill Primary School has shown a small increase of pupils both walking and cycling to school, following the implementation of the schemes.

9.37. ***Government guidance is that the safest way to travel during the pandemic by car during the pandemic***

9.38. **Hackney Response:** At the time of the decision to make the experimental TMO, Government advice to passengers was to "...help control coronavirus and travel safely by walking and cycling, if you can. Where this is not possible, use public transport or drive". In Hackney where 70% of households do not have access to a car, on many roads pedestrians would be squeezed together onto sometimes narrow pavements greatly increasing their risks of infection from the virus if we did not implement School Streets. Parents who do drive their children to school are still able to do so and complete the last part of the journey on foot to access the school and also stand to benefit from the implementation of School Streets.

9.39. ***The proposal to ban the left turn from Southwold Road into Upper Clapton Road will only cause further traffic congestion, mayhem and***

pollution, since those drivers wishing to take the left turn, will simply turn right and then immediately proceed to either do a three point turn utilising the dropped curb to the car park of the Crooked Billet or turn round utilising the forecourt of 51 to 63 Upper Clapton Road.

9.40. **Hackney Response:** The 'left turn' restriction at the Southwold Road - Upper Clapton Road junction was proposed to stop traffic using roads such as Warwick Grove, Leaside Road, Theydon Road and Southwold Road to avoid frequent traffic issues at Upper Clapton Road between the Rossington Street and Evering Road junctions. The Council acknowledges the issues raised in this comment and along with other reasons has withdrawn the banned turn restriction from the scheme.

9.41. The most commonly raised objection stated in the Commonplace survey was:

9.42. ***The traffic is being displaced to streets outside of the zone, especially on Upper Clapton Road, leading to increased congestion and air pollution.***

9.43. **Hackney Response:** Traffic volumes on Upper Clapton Road have decreased by 5% between 2019 (pre-scheme) and 2021 (post-scheme) and while this decrease cannot be attributed to the scheme, it is concluded that the scheme is unlikely to have displaced significant traffic onto Upper Clapton Road and therefore has not led to increased congestion and pollution.

9.44. Furthermore, before the scheme was implemented, Mount Pleasant Lane and Springfield was being used by non local traffic to bypass the A107, Upper Clapton Road and therefore, displacement from these roads onto Upper Clapton Road would be traffic that has detoured off of Upper Clapton Road in the first place.

9.45. If traffic has been displaced from a residential road where people live and children attend Harrington Hill school, to a major road, then there is a positive impact on residents and school children, as well as other vulnerable road users from decreased congestion and pollution.

As with any transport scheme, there can be a period of settling in while sat navs update to show the new routes.

9.46. The following comments were also mentioned in the 30 responses received via Hackney Commonplace; the School Street reduces parking availability for local residents (2), the School Street results in increased car journey times (2), the School Street shifts drop-off issues to other local roads (2), lack of consultation preceding the implementation of the School Street (2).

9.47. In addition there were 2 comments provided directly to the council, which provided feedback specifically relating to this scheme. These are outlined below along with Hackney's response.

9.48. ***Please can you confirm how car owners who reside on the High Hill Estate apply for an exemption as we do not have permit parking on our estate?***

9.49. **Hackney Response:** Officers responded directly to this question to provide further information on how the restrictions operate, explain the eligibility status of residents of the High Hill Estate and provide details of how estate residents can apply for an exemption to the School Street on Mt Pleasant Lane.

9.50. Residents of High Hill estate are exempt from the School Street restrictions. However, as they do not possess a Hackney Parking Permit they must apply for an exemption which can be done online at the School Streets webpage or by contacting the Council to request a paper application form. Residents are not exempt from the LTN restrictions.

9.51. Officers offered to add a list of resident VRMs to the exemptions list for the School Street if this was provided by the Chair of the TRA. Only one VRM was provided in response to this offer. Officers have followed up to extend this offer again, but received no response.

9.52. ***The two traffic restrictions that surround the two main access routes to the High Hill Estate are very confusing. It would be extremely helpful if a simplified letter along with exemption application forms could be sent to residents on the High Hill estate in the post as many of them don't have access to the internet. Would that be possible?***

9.53. **Hackney Response:** The Council wrote to residents at addresses inside the School Street zone SS32, including High Hill Estate, preceding the implementation of the scheme in November 2020. In response to comments above from the Chair of the High Hill estate TRA, an additional letter was provided to residents of addresses at High Hill estate in summer 2021. The letter contained detailed information about the School Street and LTN filter, including; how the restrictions work, how residents could register for an exemption and how residents could provide feedback.

9.54. **Public Consultation**

9.55. All of the public consultation discussed below was taken into consideration when analysing the traffic filters and considering the recommendations contained in this report.

9.56. **Feedback on proposals via Commonplace, emails and streetscene Freepost**

9.57. There are two main ways participants have contributed to the Commonplace platform. The first is to complete a survey. For a completed survey to appear on the site, the participant has to verify their comment via a confirmation email. The second is to add an agreement to an existing comment on the platform. Respondents can add one agreement to any comment other than

their own. Unless already logged in, they are asked to provide an email address. If they decline to provide their email address, they are treated as anonymous and comments are collected in the database but not displayed publicly.

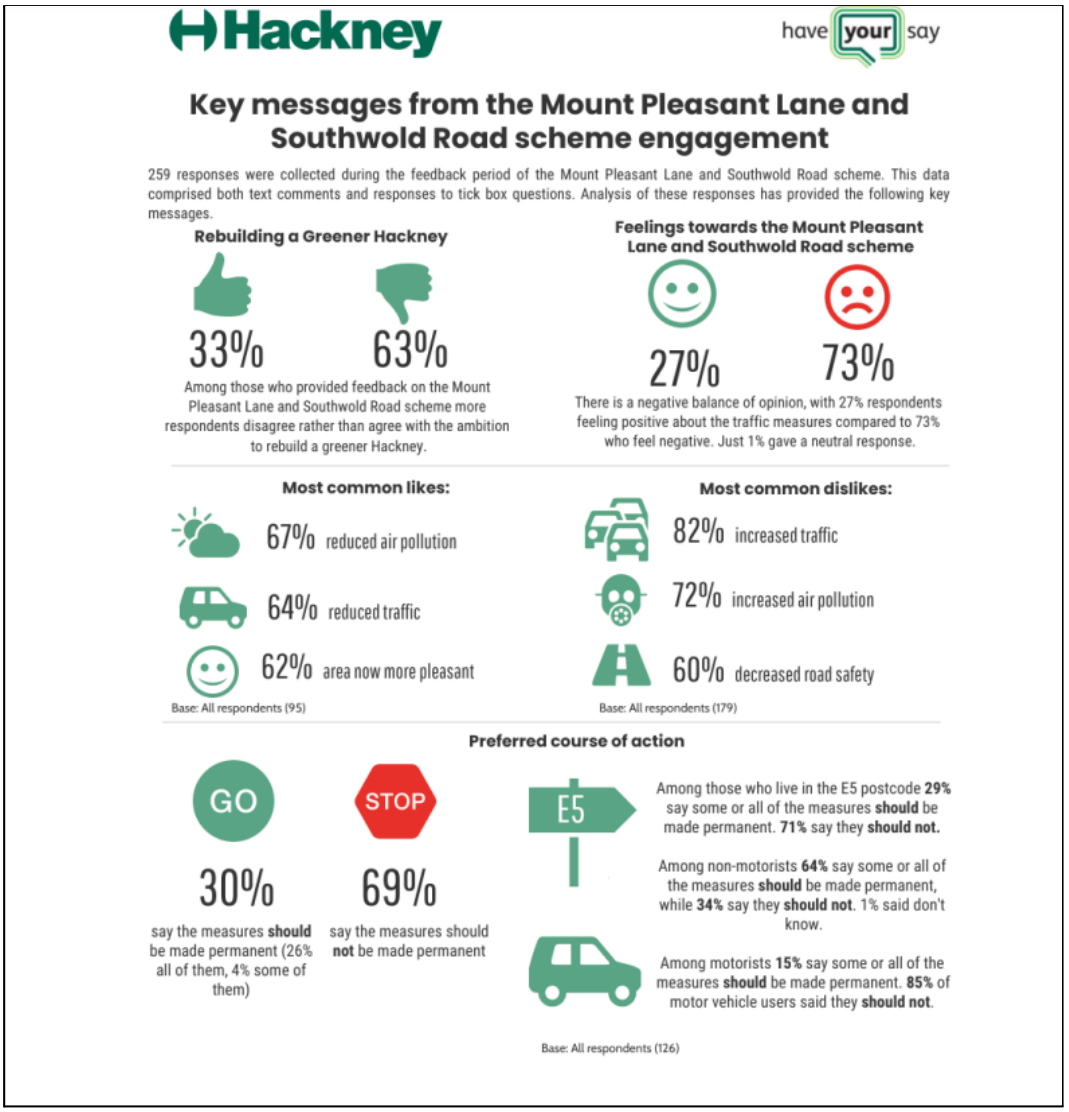
9.58. Responses from residents who wrote in using Freepost Streetscene or streetscene.consultations inbox were analysed separately by the same consultants. Analysis of all feedback and comments is included below, with Hackney's comments following toward the end of this section.

9.59. In total, 259 responses were received via Commonplace, by emails and Freepost Streetscene between 28 October 2020 and 3 May 2021. Analysis of the responses was done by M.E.L Consultants (see Appendix 6). [18]

9.60. From a sample base of 246 responses, 33% were in support of the proposals to rebuild a greener Hackney by encouraging more walking and cycling, and preventing car-use to return to pre-lockdown levels or above and 63% were against.

[18] Low Traffic Neighbourhoods - Mount Pleasant Lane and Southwold Road Feedback Report November 2021

Figure 10: **Summary of engagement process for Mount Pleasant Lane**



9.61. **Analysis of the responses that LIKED the Mount Pleasant Lane Traffic filter**

9.62. 30% wanted all or some of the measures to be made permanent and 69% did not.

9.63. Respondents were given the opportunity to record the aspects of the Mount Pleasant Lane traffic filter that they **LIKED** by responding to the question, **Overall, what do you LIKE, if anything, about the above traffic measures at Mount Pleasant Lane?**

9.64. The responses were collected through a pre-prepared list of issues/impacts and through respondents providing their own 'other' comments and the themes and percentages are shown on **Table 16**.

Table 16: themes and percentages of responses to pre prepared list of impacts / issues in the LIKE question

Theme	Percentage
Reduces air pollution	67%
Reduces traffic	64%
The area is now more pleasant	62%
Encourages me to cycle in the area	60%
Reduces rat-running	59%
Increases road safety	57%
Encourages me to walk in the area	54%
Reduces speeding	54%
Encourages me to spend time in the area	47%
More space for social distancing	39%
Encourages me to cycle to work	38%
Encourages me to shop in the area	35%
Encourages me to walk to work	27%
Other	23%
Sample Base	**95**

9.65. A statistical base of 95 for the analysis was based on the number of respondents who responded to this question as some respondents left this question blank.

9.66. **Analysis of the responses that DISLIKED the Mount Pleasant Lane**

9.67. Similarly, respondents were given the opportunity to record the aspects of the LTN that they **DISLIKED** by responding to the question **Overall, what do you DISLIKE, if anything, about the above traffic measures at Mount Pleasant Lane?**

9.68. The responses were collected through a pre-prepared list of issues/impacts and through respondents providing their own **'other'** comments. The

themes and percentages of how they polled are shown on **Table 17**.

Table 17: themes and percentages of responses to a pre-prepared list of issues/impacts in the DISLIKE question.

Theme	Percentage
Increases traffic	82%
Increases air pollution	72%
Decreases road safety	60%
The area is now less pleasant	59%
Discourages me to spend time in the area	59%
Discourages me to shop in the area	56%
Discourages me to walk in the area	41%
Discourages me to cycle in the area	31%
Increases speeding	30%
Discourages me to walk to work	27%
Discourages me to cycle to work	25%
Less space for social distancing	25%
Increases rat-running	25%
Other	13%
Sample Base	**179**

9.69. A statistical base of 179 for the analysis was based on the number of respondents who responded to this question as some respondents left this question blank.

9.70. The themes from the Other comments given in the dislike question are shown on **Table 18**.

Table 18: **Themes and percentages from Other Comments**

Theme	Percentage
Increased traffic/congestion	22%
More time in traffic/increased journey time/adds to travel	13%

distance	
More danger/safety issues/put lives in danger/can lead to accidents	13%
Increase pollution	9%
Personal stress/depression/frustration/pressure/confusion	9%
Nuisance/making lives harder/inconvenience	9%
Emergency Service access concerns	4%
Increase in equality issues highlighted e.g. disability/mobility	4%
Increase in noise	4%
More traffic on main roads	4%
Not enforced/drivers ignore/drive through	4%
Difficult to access/leave my street/property	4%
Other	22%
Sample base	**23**

9.71. Council Officers have provided comments for the individual themes as follows:

9.72. ***Increased Traffic / More traffic on roads***

9.73. Increased Traffic / congestion had the highest number of comments from residents with 22% of comments from the **Other Comments**. More traffic had 4%.

9.74. **Hackney Response:** Before and after implementation traffic surveys undertaken in the area show that there was an 87% fall in daily traffic flows at Mount Pleasant Lane and 14% fall at Springfield.

9.75. Although these traffic surveys are not extensive, the data on the available surveys shows that non local traffic is no longer using Springfield and Mount Pleasant Lane to bypass A107 Upper Clapton Road which is a positive.

9.76. ***More time in traffic/increased journey time/adds to travel distance and difficult to access / leave my property***

9.77. Concerns on **more time in traffic/increased journey time/adds to travel distance** were on 13% and 4% of the responses. These two have been combined because they deal with the same issues.

9.78. **Hackney Response:** The impact on journey times is dependent on the location of the individual resident and the journey type. Some residents living close to the traffic filter may be negatively affected by the traffic filter as direct access may not always be available however in most cases individual journeys remain unaffected.

9.79. ***More danger/safety issues/put lives in danger/can lead to accidents and Emergency access concerns***

9.80. Concerns on **danger/safety issues/put lives in danger/can lead to accidents** were on 13% and 4% of the responses. These two have been combined because they deal with the same issues.

9.81. **Hackney Response:** The Council does not accept that LTN traffic filters put lives in danger or lead to accidents. In contrast, LTN traffic filters improve safety by removing non local traffic flows making the roads safer. Emergency service vehicles can pass through traffic filters eliminating possible delays to response times.

9.82. ***Increase in pollution / Increase in noise***

9.83. Concerns on **Increase in pollution / Increase in noise** were on 9% and 4% of the responses. These two have been combined because they deal with the same issues.

9.84. **Hackney Response:** The scheme is designed to reduce traffic and therefore reduce local pollution from traffic sources, as well as indirectly reducing road based noise. Traffic counts in section 4 show reduced traffic levels on Mount Pleasant Lane, Moresby Road and minor increases on Springfield from a 2010 baseline. The Council accepts that LTN and School Streets schemes sometimes have an unequal impact geographically, with some residents benefiting from traffic reductions and not others. In the case of this scheme, the decrease in traffic and associated benefits on Mount Pleasant Lane greater benefit many residents as well as children travelling to and from Harrington Hill School, while traffic levels on Springfield are considered to have changed marginally since 2010 and therefore impacts on residents on Springfield are neutral or marginally worse. Upper Clapton Road has seen a decrease in traffic between 2019 and 2021. The Council does not consider there to be evidence of significant increases in pollution or noise in any location as a result of this scheme, but there is evidence of significant benefits.

9.85. ***Personal stress / depression / frustration / pressure / confusion and Nuisance / making lives harder / inconvenience***

9.86. Concerns on **Personal stress / depression / frustration / pressure / confusion and Nuisance / making lives harder / inconvenience** were on 9% of the responses.

9.87. **Hackney Response:** While some journeys may be inconvenienced with the implementation of the traffic filters, which may cause frustration and stress for some, the Council believes that the benefits of the LTNs outweigh these inconveniences. Low traffic neighbourhoods are a step in the right direction in improving the quality of lives for local residents. They generally promote a quieter environment where people are not intimidated by high traffic volumes and speeds. This should be the case at Mount Pleasant Lane where traffic flows have been reduced. The inconvenience of a longer journey time should be compensated for by the tranquil environment that traffic filters bring.

9.88. ***Not enforced/drivers ignore/drive through***

9.89. Comments on **Enforcement** were made on 4% of the responses.

9.90. **Hackney Reponse: Table 7** in Section 4 shows that 4225 PCNs were issued between February and November 2021. During the months of February and March only two PCNs were issued as drivers were warned of the consequences of passing through the traffic filters. Spot check enforcement using a mobile CCTV vehicle was carried out for the southern entrance to the School Street in March 2021. Traffic count data suggests that the volume of traffic through the zone is low (and some of those vehicles will be entering the zone with an exemption), and does not suggest a significant issue with non-compliance.

9.91. Illustrative comments included:

9.92. ***Increased traffic/congestion***

a. *With all these road closures, you are creating lots of traffic which has major impact on our lives*

b. *By banning a left turn onto Upper Clapton Road you are increasing traffic everywhere else made worse by the other LTNsimplemented which was introduced without consultation anyway. This change hasn't helped to make Hackney greener in fact you have made it worse. Living during the pandemic is difficult as it is but this council seems determined to make life even more difficult. This includes making people late for work when people's livelihood and jobs are at risk. This council seems determined to drive out families who have*

lived in this borough for decades

c. *These measures are only going to add to the congestion on surrounding streets!*

d. *Banning a left turn from Southwold to Upper Clapton Road does not make any sense. It is not a rat run, it is a road used by residents to leave the area. Traffic on Upper and Lower Clapton Road is usually at a standstill and moving around the area (whether by public transport, car, bike or walking) is really difficult, stressful and unpleasant. Many residents of Hackney are very unhappy with these measures and are rightly concerned about their lack of ability and right to move around, in and out of the borough (again- by public transport, car, bike or walking). It is making Hackney a really difficult and stressful place to live. Please re-think these closures and banned turns.*

e. *No left turn from Southwold Road does nothing but force more traffic to queue up Mount Pleasant Lane, the top of which is a total bottleneck already, then join Upper Clapton Road and have to join what already has recently become far busier traffic just to pass Southwold Road. It already takes too long to get out of here. I'd agree with no right turn, that would make sense and encourage people to use the right roads. All you are doing is hugely increasing traffic on Upper Clapton Road, making journeys longer, increasing pollution and stress. No, I can't stop driving as I need to get to places with no public transport options, there is a world outside of London.*

f. *The no left turn from Southwold Road will increase traffic from residents on Theydon Road and Mount Pleasant Hill will become more of a bottleneck than it already is, causing congestion, frustration and increased danger for the school children of Southwold Road. The cars waiting in what would be a perpetual traffic jam would create higher levels of pollution for those residents and children. I feel both your intention of reducing through traffic and the safety of residents could be met if residents and blue badge holders could apply for an exemption. The measures would deter people from using the Jack Watts estate as a cut through without funnelling all local residents. Turning right from Southwold Road is dangerous and slow, this would create delays on the 393 bus route (even with their bus exemption), which is the only bus route that services the estate.*

g. *The blocked left turn on Southwold Road increases traffic on Mount Pleasant all the way up the hill. It is now very dangerous at school drop off and pick up times all around the school. I cycle up and down the hill with my children every day to get to their nursery which is just off Mount Pleasant. Due to the heavy traffic on the hill and high number of parked cars on yellow lines it is no longer safe and I now*

feel we would be safer going on Upper Clapton Road! I support most LTNs but this one isn't working. It has increased traffic, pollution and danger in an already tricky area to walk and cycle.

h. *This is going to cause chaotic traffic on Mount Pleasant Lane and increase traffic on main Clapton high road when it is already choc a block. Silly proposals.*

i. *It just increases traffic on main roads and increases pollution and doubles journey times. It has no benefits.*

j. *Stop blocking the roads and forcing all traffic in the roads left open. It's not encoring any greener Hackney in fact is becoming dangerous, increasing air pollution and stressful drivers in the roads left open. Stop doing it and don't ban left turn on Southwold Road.*

k. *These LTN's simply push traffic to other areas where you increase pollution and congestion on important roads where shops and cafes are.*

l. *Please do not close any roads. This is social cleansing and making it hard for working poorer, disabled and elderly residents. Labour is meant to be for the many, not the few. This is for the few. Closing off roads turning them into virtual gated communities, this is not Hackney, The LTNs are counterproductive to air pollution by concentrating traffic on a few routes all that happens the traffic slows and causes congestion. The biggest concern is access for emergency services, time is key and could be the difference between life and death. You cannot try and model London on Amsterdam, totally different infrastructure, history and size. This is all clearly for revenue generating.*

m. *These LTNs are criminal. They are not about emissions, they are about money and they are about appeasing the minority. The majority of people will suffer, cycle lanes are empty, traffic is monumental, the affluent areas benefit while the people who live on or use the roads where traffic is being pushed onto are suffering huge amounts of pollution and a serious risk to health. The roads are no safer for cyclists as it stands.*

n. *These LTN measures simply force traffic and associated pollution to other areas and seem to be another way for Hackney and other Councils to fleece motorists.*

9.93. ***Increased pollution***

a. *The LTN is increasing pollution on the main road where many*

thousands of people live, work, shop and walk. The LTN are becoming dangerous as there is more crime.

b. *When a car journey was only 20min before this has now increased over 1hr so how does this reduce air pollution when I now stuck on the road for longer and using more petrol and now this route what's next. When we try other routes you block us again...this is wrong and needs to stop. Otherwise we just end up stuck in a car for hours with increased air pollution because we can't move!*

c. *A council study has proven that the introduction of LTN has dramatically increased pollution and it is obvious to see that it has increased congestion. For this reason the roads must be reinstated to their original forms and public spending redirected to more important things.*

d. *Get rid of them all it's an injustice of our rights and has made the area awful to move around and increased noise pollution, air pollution, increased mental health issues, the list goes on!" "Preventing left turning on Southwold Road will cause congestion and additional pollution. All traffic will have to use Mount Pleasant Lane to reach Upper Clapton Road. This is already a narrow congested road.*

e. *LTNs increase congestion and pollution on main roads, the pollution then spreads to other areas. Congestion on the remaining open main roads caused by LTNs delay public transport buses.*

f. *We are now refusing to provide our services in most areas in Hackney due to the increase in traffic, not only this, we are having to charge our customers higher rates due to the increase in our travel times which we have calculated to be 3 and sometimes 4 times longer than before these restrictions. This is not fair for our business as it incurred higher costs, reduction in productivity, low morale for staff who are travelling to customers and feel the high streets are extremely polluted.*

g. *Disaster the streets where the cars can drive are much more congested and higher air pollution.*

h. *There is now too much air pollution because of what you've done. People want their freedom back.*

i. *The air pollution is so bad now and transport is so slow it takes almost 5 times along to get anywhere. When it rains not many people walk or cycle. Businesses can't get deliveries as efficiently, builders can't get to jobs on time and the elderly and disabled can't move around as freely.*

9.94. ***More danger/safety issues***

a. *I have lived in this area for 8 years and have always enjoyed walking, more so in the last few years. Occasionally I drive. However, with it getting darker earlier, as a young female, I am worried about my safety if there are even less cars on the road. Having an active, vibrant environment is important and seeing cars on the road, especially in the evening makes me feel a lot safer. After 11, there is no bus that drives into the back roads, meaning after a night out - I could be the only person walking and this quite frankly is just not safe, if roads are closed to through traffic. Just last week Sunday (8/11) my neighbour was mugged at knife point. This happened around 7pm. This suggests that there is already serious crime in the area and with the police station on Theydon Road now closed, this is a concern. We do have a co-operative supermarket and Tesco and it is usually very busy suggesting that people shop in the area. I have seen quite a lot of people cycling and walking and do not feel that the traffic measures in place are necessary. They will not reduce pollution and will have an adverse effect on people that enjoy walking. I do agree with the school streets. However, LTNs outside this are not necessary and quite frankly will only serve one function- to make money from cameras.*

b. *I do not feel safe walking in the area anymore.*

c. *A lot of non-locals are using these roads and putting the children and pedestrians at risk. I hope with these changes the area gets a little bit safer.*

d. *You have made the roads worse! There is much more road rage since there is heavy traffic on the main roads and no back roads to get around this! This has made it very unsafe for cyclists using the main roads. Please reverse the changes and come up with a better way!*

e. *Upper Clapton Road is incredibly dangerous to cycle on and needs a segregated cycle path in both directions.*

f. *These measures are awful and affect families and businesses in the area. I walk to work but the journey has been awful as there is much more traffic on main roads and also feels less safe. I am also a carer for my father who lives nearby and it is very difficult to get to him now. The measure benefits very few and mainly new residents. It's unfair and impacts on many areas of community life.*

9.95. ***Equalities issues***

a. *Please prioritise safety for women and children. Streets without traffic*

are less safe and more intimidating.

b. *This measure is discriminatory toward all but the able bodied. Many Hackney residents, like myself, would be housebound without use of a car. These measures force more time driving, more pollution, and discriminatory exclusion from certain areas.*

c. *This is making it harder for disabled people to get around, damaging business, increasing air pollution and congestion on the main road. I am concerned about delays for emergency services. And the implementation is wholly undemocratic and an awful idea especially at a time like this. Hackney has done its residents wrong!*

d. *LTNs discriminate against elderly and disabled, many of whom cannot ride bikes. The blocked side streets are ghost towns which encourage anti-social behaviour, are a boon to those who vandalise and steal from parked cars, and also house burglars (the police cannot chase the criminals' mopeds). LTNs create unsafe areas for women to walk unaccompanied. There are no alternate routes available when one of the few remaining open roads has to be closed due to an accident or road works.*

9.96. Risk Assessment

9.97. The main risk to the Council with these proposals is reputational as the scheme is controversial, having attracted significant levels of opposition via the Commonplace consultation platform. However, it should be noted that the Commonplace results for this scheme may not be representative of overall sentiment as the number of responses received is fairly low (260) and inconsistent with representative polling that shows strong support for School Streets schemes.

9.98. However, as this report describes, the risks of taking no or minimal action are real in terms of increased risk of death or serious health impact on our residents from failing to act to mitigate motor vehicle dominance on our streets and the consequent reputational damage on the Council that those risks being realised would entail.

9.99. The mitigation to the risk of unanticipated traffic impacts was to use experimental traffic orders. This meant that Hackney Council could assess the real-world impacts of the scheme, and has found that there are positive traffic impacts on Mount Pleasant Lane, and marginal traffic increases (from a 2010) base of 61 vehicles on Moresby Road and 108 vehicles on Springfield (over 24 hours).

9.100. In 2018 there were nearly 2,000 child casualties from road traffic collisions in London. School Streets reduce the risk of accidents arising from inconsiderate parking and driving endangering other motorists, cyclists and pedestrians -

especially children. Reducing vehicle traffic directly outside the school gates, would also reduce the risk of collisions occurring if those children arriving at school on foot and by bicycle, are forced to step into the carriageway to try and socially distance themselves.

9.101. There is a slight risk that, by creating lower traffic environments, School Streets encourage pupils to view the road as car free and children think it is safe to cross or play in the road. Schools are encouraged through their Road Safety programmes to reinforce the message that the School Street is not a vehicle free zone. This can happen, for example, through classroom activities or assemblies led by the Junior Road Safety Officers.

9.102. However, this risk is outweighed by the overall benefits of the scheme and the greater risk is that removing the School Street and LTN traffic filter on Mount Pleasant Lane would revert the road layout and reverse the traffic reduction and positive road safety outcomes which the scheme has achieved in the experimental period.

10. COMMENTS OF THE GROUP DIRECTOR OF FINANCE AND CORPORATE RESOURCES

10.1. On April 4, 2022, the existing experimental traffic directives that implemented the School Street & LTN filter will expire. If they are not made permanent, the road layout will revert to always allowing two-way traffic. If this happens, the benefits of establishing a peaceful atmosphere for surrounding homeowners and Harrington Primary School students will be reversed.

10.2. The report's recommendations in section three aim to make the two traffic orders that implemented the School Street & LTN filter at the end of the 18-month trial period permanent. The other suggestion is to remove the prohibited left turn restriction from Southwold Road to A107 Upper Clapton Road, giving officers more time to investigate any future proposals for this location. The initial design of the experimental scheme featured a prohibited left turn limit from Southwold Road into the A107 Upper Clapton Road. This element has not been implemented, and it is proposed that it be removed.

10.3. All the evidence suggests the project achieved its key objectives of reducing congestion at the school gates, creating a better balance between walkers, cyclists, and cars, and making it easier and safer to walk and cycle to school, according to the review of the experimental period. It has also addressed the issue of rat-running traffic using Mount Pleasant Lane to avoid congestion on Upper Clapton Road, making the atmosphere more pleasant for active travel.

10.4. The infrastructure erected for the experimental period will be retained, which has been funded mainly by grant from TfL. There are minimal ongoing costs for the statutory process and also traffic counts for monitoring traffic volumes at each school.

10.5. School Streets aid in the protection of children at the school gates from the harmful effects of air pollution on their health. These are sections of road in the near proximity of schools where motor vehicles are not permitted to enter during the hours when the majority of students arrive and depart. Most are forbidden through physical measures (such as temporary barriers), but some rely only on traffic signs and Automatic Number Plate Recognition (ANPR) cameras to deliver a Penalty Charge Notice to offending drivers.

10.6. The residents living within the closed sections of the School Street zones who require access, will be able to apply for a virtual exemption permit for nominated vehicles to access the zone at all times without committing an offence. Resident vehicles need to be registered to an address within the School Street Zone. That vehicles nominated by resident Blue Badge holders and Blue Badge holders of the school (pupils, parents, and staff) who require access will be exempt from the zone at all times without committing an offence.

11. VAT IMPLICATIONS ON LAND & PROPERTY TRANSACTIONS

11.1. No VAT implications.

12. COMMENTS OF THE DIRECTOR OF LEGAL & GOVERNANCE SERVICES

12.1. A local authority is empowered under the Road Traffic Regulation Act 1984 to make an experimental traffic order ("ETO") "for the purposes of carrying out an experimental scheme of traffic control" which may continue in force for a maximum of 18 months. The order may empower an officer to modify or suspend the order.

12.2. Regulation 23 of the Local Authorities Traffic Orders (Procedure) (England & Wales) Regulations 1996 sets down the procedure for an order where "the sole effect of an order ('a permanent order'), which is not an order made under section 9 of the 1984 Act, is to reproduce and continue in force indefinitely the provisions of" an ETO or ETOs.

12.3. The statutory requirements ordinarily applicable to an order that does not solely continue in force the provisions of an ETO are disapplied on condition that the requirements in Regulation 23(3) have been complied with. The requirements imposed by Regulation 23(3) are, among other things, that the notice of making the ETO made clear that the authority would be considering making the order permanent and that any person could, within six months of the making of the ETO, object to the authority making the order permanent.

12.4. Before making a permanent order, an authority must consider all the objections that are made in response to the notice of making, published in respect of the relevant ETO.

12.5. Any person may within 6 weeks apply to the High Court to question the validity of a permanent order but an order may not otherwise be questioned in any legal proceedings whatsoever.

12.6. The network management duty in s.16 of the Traffic Management Act 2004 is a continuing duty and the authority is obliged pursuant to s.17 TMA 2004 to keep its performance of the network management duty under review.

12.7. The public sector equality duty continues to apply when making an experimental scheme permanent.

12.8. Within the scheme of delegation for Neighbourhoods and Housing, delegation (authority) for making permanent orders under Section 6 of the Road Traffic Regulation Act (RTRA 1984) falls under (what is currently numbered as): NH256 - Making "permanent" orders for prescribed routes, waiting and loading restrictions, bus stop and school clearways, disabled persons' parking places, doctors' parking places, free parking places, loading bays, bus and cycle lanes, pedestrian zones, weight, height and length restrictions, is delegated to Director, Public Realm and Head of Streetscene.

12.9. Whilst, the power to make Experimental Traffic Orders permanent fall within the powers delegated to the Head of Street Scene within the scheme of delegation, as the School Street (SS32) at Harrington Hill Primary School and Low Traffic Neighbourhood (LTN) on Mount Pleasant Lane affects two or more wards, and given the legal challenge to the Experimental Traffic Order, the scheme is a key decision and also falls within the remit of a Cabinet decision. Cabinet is able to approve the recommendations set out in this report.

APPENDICES

Appendix 1 - Harrington Hill Primary School School Street and Mount Pleasant Lane Low Traffic Neighbourhood measure general layout

Appendix 2 - Mount Pleasant Lane Road Closure Map

Appendix 3 - Overview of Mount Pleasant Lane, Springfield Gardens and Southwold Road

Appendix 4 - Interim Equalities Impact Review

Appendix 5 - Timeline of LBH Correspondence with Side by Side School

Appendix 6 - M.E.L. Mount Pleasant Lane and Southwold Road Consultation Report

EXEMPT

Not applicable.

BACKGROUND PAPERS

In accordance with The Local Authorities (Executive Arrangements) (Meetings and Access to Information) England Regulations 2012 publication of Background Papers used in the preparation of reports is required

Description of document (or None)

None.

Report Author	Tyler Linton - *Tel :* 0208 356 8069 Group Engineer - Sustainable Transport and Engagement tyler.linton@hackney.gov.uk
Comments of the Group Director for Finance and Corporate Resources	Nurur Rahman - Tel : 0208 356 2018 Group Accountant, Directorate Finance Team nurur.rahman@hackney.gov.uk
Comments of the Director for Legal and Governance Services	Josephine Sterakides - Tel : 0208 356 2775 Senior Lawyer, Public Realm and Litigation josephine.sterakides@hackney.gov.uk