

Chief Officer Decision

[Written Statement – Regulation 13(4) Local Authorities (Executive Arrangements) (Meetings and Access to Information) Regulations 2012 and the Openness of Local Government Bodies Regulations 2014]

Directorate	Environment, Culture and Customer Services
Name and title of Chief Officer ¹	Jefferson Nwokeoma, Assistant Director for Traffic, Transport and Parking
Date	27 August 2021
Title for decision	Covid-19 Transport Response – Interim Review of Streetspace Phases 1 & 2a
Key decision ²	No
Forward Plan reference ³	N/A
Decision (To be recorded as soon as practicable and be available for inspection along with all background papers that have been used to inform the decision unless exempt from publication. If exempt include details of the exemption relied on here. Decision to be retained indefinitely in accordance with Records Management aPolicy)	That the Chief Officer: <ul style="list-style-type: none"> a) Notes the Interim and Final Reviews undertaken by the independent consultant on the Streetspace schemes implemented in Phases 1 & 2a, including both the transport analysis and the consultation feedback appended to this report b) Notes the consultation feedback, data analysis and policy requirements on the Phase 1 and 2a Street Space Schemes trials appended to this report. c) Approves that the schemes set out below are made permanent through the implementation of permanent Traffic Management Orders: <ol style="list-style-type: none"> 1. Bus Lane - High Street (Brentford): eastbound near Market Place, eastbound near B455 2. Bus Lane - Twickenham Road (Isleworth): southbound near Town Field Way 3. Bus Lane - London Road (Isleworth): eastbound near Green School, eastbound near Old Meadows Lane, westbound near Bridge Road, westbound on Swift Alley 4. Bus Lane - Heston Rd (Heston): southbound south of Old Cote Drive, southbound leading to A4 5. Bus Lane - Hounslow Road (Feltham): northbound near Park Way

¹ Authorised officers are an Executive Director, Director or an officer who reports directly to a Chief Officer.

² A key decision is an executive decision which is likely to result in the council incurring expenditure or making savings that is/are significant (i.e. **£500,000 revenue or £1,000,000 capital**) having regard to the budget for the service or function to which the decision relates **OR** is significant in terms of its effects on communities living or working in an area comprising two or more wards. Key decisions apply only to executive decisions.

³ At least 28 days' notice on the Forward Plan is required where an executive decision is a key one

6. Bus Lane - Chiswick High Rd (72-22)
7. Bus Lane - Chiswick High Rd (Heathfield to Essex Place)
8. Bus Lane - Chiswick High Rd (578-466)
9. Cycle Lanes - Twickenham Rd (Telephone Exc.)
10. Access Restriction - Dan Mason Drive
11. Access Restriction - Occupation Lane
12. Access Restriction - Green Dragon Lane
13. Access Restriction - Whitestile/Challis
14. Access Restriction - Amhurst Gdns, Teesdale Ave, Teesdale Gdns
15. Access Restriction - Duke Road
16. Access Restriction - Fishers Lane
17. Access Restriction - Chestnut Ave/ Clayponds Ave
18. Access Restriction - Harvard Hill
19. Access Restriction – Strand on the Green
20. Access Restriction – Staveley Road/Park Road
21. Access Restriction – Lawford Road (banned turn)
22. Access Restriction – Hartington Road/Cavendish Road

d) Approves that the following 'School Streets' trials should be made permanent through the introduction of permanent TMOs:

1. Marlborough, Smallberry Green (London Rd)
2. Nishkam extension (Leigham Drive)
3. Sparrow Farm (Denham Road)
4. Hounslow Town
5. Springwell
6. Lionel Primary
7. Isleworth Town
8. St Pauls CofE School (Albany Rd)
9. Springwell (Speart Ln)
10. St Michael & St Martin RC Primary School (Belgrave Rd)
11. Hounslow Heath Junior School (Selwyn Close)
12. Green Dragon Primary School (North Street)
13. Fairholme Primary School (Peacock Ave)
14. Orchard Primary School (Orchard Rd)
15. Spring Grove Primary School (Star Rd)
16. Edward Pauling Primary School (Redford Close)
17. Ivybridge Primary School (Summerwood Rd)
18. Oriel Primary School (Hounslow Rd)
19. Lampton School (Lampton Ave)
20. Grove Park Primary
21. Cavendish Primary
22. St Mary's Catholic Primary School

e) Approves that the Chiswick School 'School Street' should be modified to restrict access to general traffic from 8am to 5pm, Monday to Saturday (Buses and permit holders under the Grove Park and Fauconberg Controlled Parking Zone area and Staveley Road allotment holders will be exempt).

	<p>f) Approves the introduction of a new Experimental Traffic Management Order at the Burlington Lane j/w the A316, the effect of which will be to prohibit entry from the A316.</p> <p>g) Notes that a review of the access restrictions at Fishers Lane will be undertaken in the autumn of 2021, in collaboration with the London Borough of Ealing; with a decision on the future of the scheme being made by the Chief Officer in consultation with the Lead Member.</p>								
Reasons	<p>1. On 7 May 2020, as Phase 1 of the council's Covid-19 transport response, Chief Officer Decision DDN 514 – resolved to implement, as soon as practicable, a set of traffic management changes to help provide space for social distancing and support road safety for vulnerable road users. On 29 May 2020, Chief Officer Decision DDN 524 approved further changes to the borough's road network as Phase 2a of this response. The approved changes were implemented as described in Table 1 below. Before making the changes, the council fulfilled its network management duty by assessing the likely effect on all types of highway user including ensuring the sufficiency of parking and loading facilities that remained. All changes were also assessed for their potential effect on people with one or more of the protected characteristics i.e. race, sex, disability, age, sexual orientation, religion or belief, pregnancy or maternity, marriage or civil partnership and gender reassignment. Where potential inequalities were identified, modifications were made to mitigate those effects at the design stage including the provision of dedicated blue badge parking, and the choice of access restrictions to minimise potential journey times. In so doing, the council complied with the requirements of the public sector equality duty.</p> <p>2. Schemes introduced through the Chief Officer Decisions DDN 514 and DDN 524 are detailed in Table 1 below.</p> <table border="1" data-bbox="679 1597 1430 1951"> <thead> <tr> <th colspan="2">Table 1: Schemes Implemented as Part of Streetspace Phases 1 and 2a</th> </tr> <tr> <th>Scheme</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chiswick High Rd (72-22) - extend operational hours of existing bus lanes to 7am-7pm</td> <td>22/06/2020</td> </tr> <tr> <td>Chiswick High Rd (142-114) - extend operational hours of existing bus lanes to 7am-7pm</td> <td>22/06/2020</td> </tr> </tbody> </table>	Table 1: Schemes Implemented as Part of Streetspace Phases 1 and 2a		Scheme	Date	Chiswick High Rd (72-22) - extend operational hours of existing bus lanes to 7am-7pm	22/06/2020	Chiswick High Rd (142-114) - extend operational hours of existing bus lanes to 7am-7pm	22/06/2020
Table 1: Schemes Implemented as Part of Streetspace Phases 1 and 2a									
Scheme	Date								
Chiswick High Rd (72-22) - extend operational hours of existing bus lanes to 7am-7pm	22/06/2020								
Chiswick High Rd (142-114) - extend operational hours of existing bus lanes to 7am-7pm	22/06/2020								

	Chiswick High Rd (Windmill to Duke) - extend operational hours of existing bus lanes to 7am-7pm	22/06/2020
	Chiswick High Rd (Heathfield to Essex Place) - extend operational hours of existing bus lanes to 24/7	22/06/2020
	Chiswick High Rd (578-466) - extend operational hours of existing bus lanes to 24/7	22/06/2020
	Hounslow Rd (Feltham) - extend operational hours of existing bus lanes to 24/7	22/06/2020
	Heston Rd (Aldeney Ave) - extend operational hours of existing bus lanes to 7am-7pm	22/06/2020
	Heston Rd (Old Cote Drive) - extend operational hours of existing bus lanes to 24/7	22/06/2020
	High Street (Pottery Rd) - extend operational hours of existing bus lanes to 24/7	22/06/2020
	London Rd (High St-777) - extend operational hours of existing bus lanes to 24/7	22/06/2020
	London Rd (Bridge to 795) - extend operational hours of existing bus lanes to 7am-7pm	22/06/2020
	London Rd (Star Rd) - extend operational hours of existing bus lanes to 24/7	22/06/2020
	London Rd (Green School) - extend operational hours of existing bus lanes to 7am-7pm	22/06/2020
	Twickenham Rd (Telephone Exc.) - replace London-bound bus lane with two 1-way cycle lanes	22/06/2020
	Twickenham Rd (Town Field Way) - extend operational hours of existing bus lanes to 24/7	22/06/2020
	High Street (Market Place) - extend operational hours of existing bus lanes to 7am-7pm	22/06/2020
	Bath Road (Hounslow West) - replace parking spaces with widened footway	05/06/2020
	Old Market Place Chiswick - replace parking bays with widened footway	06/01/2020
	Wellesley Rd & Stile Hall Gdns - point road closures at A205 to all motor vehicles	06/04/2020
	Dan Mason Drive - point road closure to all motor vehicles	22/05/2020
	Occupation Lane - point road closure to all motor vehicles	06/07/2020
	Green Dragon Lane - no through route for motor vehicles	23/07/2020

	Devonshire Road - no motor vehicles except (a) for access or (b) blue-badge holders	29/06/2020
	Turnham Green Terrace - no motor vehicles except for buses, taxis, and access; replace parking bays with widened footway	09/07/2020
	Whitestile/Challis – Diagonal Rd closure, no entry except HGVs	07/09/2020
	Amhurst Gdns, Teesdale Ave, Teesdale Gdns - no motor vehicles except for access	23/07/2020
	Duke Road - no entry from Chiswick High Road except for cyclists	19/07/2020
	Fishers Lane - point road closure to all motor vehicles except buses	31/07/2020
	Chestnut Avenue - point closure for all motor vehicles & no-right-turn into Clayponds Ave	21/08/2020
	Harvard Hill - no exit for motor vehicles on to A4	30/07/2020

3. For those changes which required traffic management orders, the experimental traffic management order (ETMO) process was used. For a limited number of schemes these started out as Temporary Orders to implement as swiftly as possible before we followed up with an ETMO. This allowed the council to introduce the changes quickly.
4. The experimental traffic order process enables a council to trial changes to traffic management on their highway network. Each trial can continue for up to 18 months, but if the council has in mind that it may wish the change to be made permanent then it must follow a prescribed procedure. This involves:
 - a) establishing what effect, the trial has had, and is likely to have in the future, on all types of road user, including the sufficiency of parking and loading
 - b) establishing that, were the change to be made permanent, the council would still be fulfilling its public sector equality duty and that making the change permanent would be in accordance with the council's Air Quality Action Plan
 - c) carrying out public consultation over at least the first six months of operation and considering with an open mind any objections that are received prior to deciding whether to modify the changes or to make them permanent
5. Accordingly, following the initial six months from the commencement of the trials', the council considered, for each, whether to:

- a) make any measure permanent.
- b) modify any measure.
- c) bring any trial to an end, reverting to the traffic management arrangement that existed in May 2020; or
- d) continue the experiment and schedule a further review (for a final decision by the Lead Member/ Cabinet).

The [October 2020 Cabinet report](#) (enacted in December 2020 following call in) permits the decision on informal reviews to be taken by the Chief Officer in consultation with the Lead Member.

6. On 17 May 2021, following a review of the Phases 1 & 2a Streetspace measures, [Chief Officer Decision DDN636](#) approved the progression of the majority of schemes listed in table 1 to Final Review, except the following:

- a) Footway Widening – Bath Road (Hounslow West) – this trial was discontinued following a six-week engagement with local businesses.
- b) Access Restriction – Devonshire Road – this trial was modified to reintroduce access to general traffic during the hours of 8am to 5pm, repurposed five parking bays for outdoor dining, and made provision for disabled parking.
- c) Access Restriction – Turnham Green Terrace – the trial was modified to remove the access restriction, waiting restriction, and reinstatement of the pay and display parking, while retaining the loading and disabled parking bays.
- d) Bus Lane & Access Restriction - the following Phase 1 & 2a trials were removed from the Streetspace programme as the trials have either been removed or made permanent as a result of TfL works and associated Traffic Orders:
 - Bus Lane - Chiswick High Rd (72-22)
 - Bus Lane - Chiswick High Rd (142-114)
 - Bus Lane - Chiswick High Rd (Windmill to Duke)
 - Access Restriction - Wellesley Rd & Stile Hall Gdns
- e) Footway Widening – Old Market Place - the trial was brought to an immediate end, reverting to the traffic management arrangement that existed in May 2020.

7. Funding to implement the recommendations in this report has been agreed with Transport for London as part of the 2021/22 Local Implementation Plan (LIP) settlement.

Network Management – Movement Generally of Goods and People

8. The council commissioned the consultancy practice Steer to collect and review a range of data sources to understand what effect the schemes had had on travel patterns and to analyse the consultation feedback. Their full report, provided as an Appendix to this report, have been used to inform the following officers' advice.
9. With the Secretary of State's May 2020 directive (that triggered Phase 1 and 2(a) of Streetspace) being announced after Covid-related travel restrictions were in place, there was no ability to undertake street-by-street "before" traffic surveys to establish baselines against which "after" surveys could be measured. Accordingly, it is not possible to quantify some differences before and after Streetspace schemes were introduced. Nonetheless, the data that Steer have acquired does provide some useful insight.
10. To assess what effect the schemes had on motor vehicle traffic, Steer used historic data from the global transport analytics company INRIX to compare before / after traffic patterns in the schemes' vicinity. This revealed a broad spectrum of changes in the amount of traffic and how it moves around the borough with an overall decrease in both vehicle trips and traffic volume. Steer's findings have not highlighted any significant impact on the operation of Hounslow's highway network as a direct result of the trial measures.

Network Management – Public Transport and Taxis

11. The Streetspace schemes listed in Table 1 have not affected the routing or stopping of any scheduled bus route. However, because some schemes are designed to stop through-traffic using residential side-streets, some traffic was expected to divert on to the main road network. Steer used data provided by TfL's automatic bus location system iBus to determine how bus journey times and bus reliability had been affected.
12. Based on an assessment of bus journey time changes from Jan 2020 to May 2021, Steer found an association between Streetspace schemes and increased bus journey time at three locations: Twickenham Road (increases on peaks during weekdays); High Street Brentford (Increases on weekends, potentially related to congestion due to M4 weekend closures); and Chiswick High Road (bus journey time was generally unchanged, although some small to moderate increases were observed during some time periods on weekdays). Route E3 showed increases in bus journey times on weekdays and Saturdays, possibly attributable to the temporary cycleway on Chiswick High Road.

Network Management – Walking and Cycling

13. Whereas INRIX collect reliable trip data for motorised traffic, Steer advise that no comparable data is collected in relation to walking or cycling. Whilst mobile phones apps such as Google, Strava and Kamoot collect significant amount of crowdsourced data on users' walking and cycling journeys, [research has shown](#) that data to be largely unsuitable for informing the effect that Streetspace schemes have had on these travel modes.
14. While it was the Council's intention to undertake surveys of the number of people walking and cycling in the vicinity of the schemes, this needed to be undertaken at the end of the COVID-related lockdown restrictions. Given that lockdown restrictions were only lifted on 19 July 2021, it was not practicable to undertake a survey on walking and cycling in the vicinity of the schemes considered in this report, in advance of this review.

Air Quality

15. The intrinsic relationship between traffic levels and air quality means that the data issues described above are also masking any effect Streetspace schemes are having on air pollution. Again, the suddenness of the Secretary of State's May 2020 directive meant that there was no ability to undertake "before" surveys of air quality on the roads affected by the schemes considered in this report to establish baselines against which "after" surveys could be measured. It should be recognised that following the government's advice to stop non-essential travel on 16 March 2020 and the first lockdown, which came into effect on 26 March 2020, any data collected after this point for the purposes of establishing 'before' data would not be representative of that expected post-pandemic.
16. In accordance with its Air Quality Action Plan, the council published its [Annual Status Report](#) in August 2021, which shows that since 2020 there has been a reduction in both fine particulate matter (PM_{2.5}) and nitrogen dioxide (NO₂), with levels of coarse particulate matter (PM₁₀) remaining steady. But the extent to which this is attributable to the Streetspace schemes remains unclear due to the masking effect of the pandemic.
17. Noise levels have not been measured.

Equalities

18. Decision makers should have due regard to the public sector equality duty in making their decisions. The equalities duties are continuing duties they are not duties to secure a particular outcome. The equalities impact will be revisited on each of the proposals as they are developed. Consideration of the duties should precede

the decision. It is important that the chief officer has regard to the statutory grounds in the light of all available material such as consultation responses. The statutory grounds of the public sector equality duty are found at section 149 of the Equality Act 2010 and are as follows:

- A public authority must, in the exercise of its functions, have due regard to
 - the need to:
 - (a) eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
 - (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard to the need to:
 - I. remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic.
 - II. take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - III. Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low. The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities. Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
 - i. Tackle prejudice, and
 - ii. Promote understanding.

19. Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

	<p>20. The relevant protected characteristics are:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Gender reassignment <input type="checkbox"/> Pregnancy and maternity <input type="checkbox"/> Race <input type="checkbox"/> Religion or belief <input type="checkbox"/> Sex <input type="checkbox"/> Sexual orientation <input type="checkbox"/> Marriage and Civil partnership <p>21. Consultations were held on the schemes for the 6-month period following each phase of implementation. Over 9,900 responses were received between June 2020 and June 2021. The demographic profile of respondents was based on answers to the closed questions, these questions were optional so not all respondents provided an answer. The response from those who identified as disabled have been highlighted within the consultation reports given in the Appendices.</p> <p>22. As with every traffic management scheme that the council has considered introducing since equalities legislation was first introduced, the design process for Phases 1 and 2(a) of the Streetspace programme placed due regard to the need not to disproportionately disadvantage people with one or more of the protected characteristics. Where potential for such issues was identified, mitigating measures were incorporated into the detailed designs. For example, the provision of dedicated disabled parking bays in areas where parking has removed.</p> <p>23. Nonetheless, following these schemes' implementation, responses have been received that some restrictions on motor vehicles' access and/or drivers' ability to park are disproportionately affecting people with a disability, elderly people, and pregnant women.</p> <p>24. A significant proportion of this criticism has been levelled generically across the whole of London's Streetspace programme, and specific to schemes in each London Borough, as opposed to specific schemes in the borough of Hounslow. For the schemes detailed in this report the common theme in these objections is that people with these characteristics are more likely to rely on a private motor vehicle and taxis so will be disproportionately more affected by Streetspace's restrictions on their use.</p> <p>25. Although each scheme was individually assessed, the common theme was that all the proposed changes comprised one or more of the following:</p>
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- Prohibited movement (i.e. all motor vehicles can still reach their destination but must use another route to do so)
- Prohibition on using a road as a through-route
- Prohibition on waiting or loading (all motor vehicles must park or load somewhere else)

Prohibited movement and prohibition on using a road as a through-route

26. The direct effect of prohibiting a traffic movement (e.g. “no entry”, “no right turn”, “no motor vehicles”) or prohibiting the use of a road as a through-route (e.g. “no motor vehicles except for access”) is to require a motor vehicle to take another route to reach its destination. Any additional time or cost that may be incurred in reaching that destination is experienced more heavily by those whose protected characteristic may mean that they are more reliant on this form of transport.
27. One of the Streetspace initiative’s primary objectives is that any increase in time or cost will persuade some people to undertake that journey by foot or by cycle instead thus reducing motor traffic and increasing air quality for all. Although this option of modal shift is not open to some people (e.g. those with limited mobility), they would still benefit from any subsequent reduction in motor traffic.
28. Nonetheless, in light of some boroughs (e.g. LB Ealing and LB Lewisham) recently having made holders of blue badges exempt from some prohibited traffic movements, a further equalities assessment was carried out in April 2021 for the schemes listed in Table 1. This assessment established that although someone having a blue badge was a good indicator of whether they were able to walk or cycle instead of drive, there is a challenge for an enforcement authority using this information as an exemption criterion for a moving traffic offence. The issue is that a blue badge is held by an individual and is valid whenever that individual is an occupant in any motor vehicle; the enforcement authority has nothing to link that individual to that vehicle. Thus, for a vehicle carrying a blue badge holder to be made exempt from a moving traffic offence, the holder of that badge would need to register with the enforcing authority which vehicle they are being carried in. This is how Transport for London operate their [Blue Badge holder’s discount for the Congestion Charge](#) in which, for £10, a blue badge holder can register exemption for up to two vehicles that they travel in (effectively, those two vehicles are granted a permit). Currently, there is no operationally feasible way for the council to provide exemption for blue badge holders who receive lifts from multiple people or for those who use taxis or private hire vehicles. Accordingly, it is

not feasible to simply make all holders of blue badges exempt from a prohibited movement.

29. The traffic management scheme would need to be one of granting exemption for *permit holders* as opposed to *blue badge* holders to enable enforcement of the restrictions. Although at first glance the difference may not seem significant, the challenge of ensuring that a permit system is fair, equitable and does not disproportionately disadvantage people with one or more protected characteristics is considerable. It is for this reason that the council is trialling exemption permits for the experimental School Street schemes introduced under Phase 2a of Streetspace. Having been disrupted by the second Covid lockdown, that trial is still underway, and it is not yet possible to draw conclusions. Until those findings are known it would be premature to consider introducing permits granting exemption from more prohibited movements.
30. In response to claims of inequality that were lodged against specific schemes and outlined in the consultation response Appendices, an officer panel chaired by the Interim Assistant Director of Transport and Parking was convened to re-examine the effect of the changes that were introduced. The panel identified some disproportionate impacts upon the elderly, disabled and pregnant women on the basis that they would be less likely to be in a position to change their mode of travel to walking or cycling. However, it was considered that these disbenefits were outweighed by the overall positive benefits of the scheme.
31. Whilst this consequence is largely unavoidable, the Council does offer free one-to-one cycle training sessions open to residents with learning and physical disabilities, from the age of 10 years upwards. Future, the Council is currently in the process of establishing an Equalities in Design Forum to consider what effects proposed infrastructure projects may have in equality issues. The Design Forum membership includes representatives of organisations in the voluntary and community sector who are advocates for people with one or more protected characteristics.

Effect on Local Business

32. A traffic management scheme seldom has a consistent (positive or negative) effect across all local businesses. Reducing traffic on a road, for instance, may disbenefit some by reducing passing trade yet benefit others by creating an environment that is more attractive as a destination for shopping or eating. Widening pavements may allow some businesses to increase their trading area, yet the consequential reduction in kerbside space may make it harder for others to get goods delivered.

That these effects are largely impossible to forecast is one reason that experimental schemes such as Streetspace have long been used to test the effect that traffic measurement measures have on local businesses before any decision is made on whether to make the measures permanent. However, the seismic effects that Covid has had on local businesses has meant that, as with traffic patterns, it is not possible to differentiate effects that have arisen as a result of Streetspace.

33. To understand those wider effects on London businesses, the GLA commissioned the Alan Turing Institute. Their analysis shows a number of areas in the borough of Hounslow where spend in October 2020 exceeded that in October 2019. The analysis does not identify areas where spend has reduced although a further 'deep dive' into the data is planned. Officers have requested access to this data to enable analysis at a more granular level as the effects on businesses has not been uniform.
34. In other efforts to understand effects on trading at a more detailed level, the council has worked with GLA to gather data from O2 and Mastercard. Unfortunately, the level of granularity has so far proved insufficiently detailed to provide the street-level data needed to evidence any differential effect that may have arisen due to Streetspace schemes.
35. In qualitative terms, some of the measures installed provide the opportunity for the hospitality sector to use the new space on the highway for trading purposes, to date this has not been widely adopted but enquiries are being received including on Devonshire Road.

Public Consultation

36. Conventionally, when a council is considering whether to implement a traffic management scheme it carries out targeted public consultation in advance in order to learn things it does not already know, from the people it needs to hear it from. It does this by inviting comment from a range of stakeholder groups and delivering a questionnaire to premises likely to be most affected.
37. For the reasons described in the May 2020 delegated decision reports, it was not possible to take this approach with the schemes listed in Table 1.
38. Instead, the ETMOs required to implement the schemes listed in Table 1 explained that anyone wishing to comment on a trial scheme should write to the council within six months of the ETMO coming into effect. The [StreetspaceFeedback](#) using the CitizenSpace online platform was launched to encourage responses and media releases were accompanied by articles in the [Summer, Autumn and Winter 2020 editions of Hounslow](#)

[Matters](#) (the council's magazine delivered to all local residents and businesses) encouraging readers to submit their views.

39. The period of feedback ended in June 2021. By that date, the council had received 9,900 responses to the schemes listed in Table 1. Summaries of these responses are attached as Appendices to this report.
40. The majority of those who contacted the council opposed the schemes, with the percentage varying from 57% to 92% depending on the scheme. The proportion who called for the trials to be stopped or reversed immediately varied from 50% to 88% depending on the scheme.
41. The most common reasons for objecting were:
- that the council should have carried out public consultation beforehand
 - that residents, particularly people with disabilities and the elderly, were disproportionately affected
 - that some journeys were taking longer
 - a perception that traffic levels and/or congestion and air pollution had increased on surrounding roads
 - a perception that the schemes were harming the local economy
 - a perception that measures had increased emergency services' response time
 - a perception that the scale of the Streetspace initiative was too disruptive
42. In addition to this feedback, the council received two online petitions. The first, submitted in November 2020, had 4,319 signatories and [called for all Covid-related Streetspace measures in Chiswick to be reversed](#). The second, which remains open for people to sign, currently has 10,099 signatories and [calls for Hounslow and Ealing Councils to reopen Turnham Green Terrace and Fishers Lane](#). Petitioners' concerns were amongst those listed in the preceding paragraph.
43. 6 public engagement events were undertaken virtually using Teams video conferencing between 2 – 6 August 2021. This consisted of three Councillor engagement meetings and three public engagement meetings. More than 300 people registered to attend the public meetings.
44. Two meetings were held between the Assistant Director for Traffic, Transport and Parking and a group of residents from South Chiswick to discuss an alternative plan to the Streetspace measures in their area. These meetings took place virtually using Teams video conferencing on 13 & 20 August 2021.

45. Live public engagement events were also undertaken virtually using Teams video conferencing in December 2020 and January 2021. Publicised using local media, residents' newsletters, Twitter, Facebook and Nextdoor social media platforms and Hounslow Chamber of Commerce, 548 people registered for 9 engagement events. The Council's consultant, Steer, presented findings from their analysis and sought input from attendees. Presentations, questions, and answers from those sessions are published on the council website.

Scheme	Engagement Event	Date
Hounslow Road (Feltham) Bus Lane	Bedfont, Feltham, Hanworth, Heston, Cranford, and Central Hounslow	17 December 2020
Heston Rd (Aldeney Avenue) Bus Lane		
Heston Rd (Old Cote Drive) Bus Lane		
London Rd (High Street-777) Bus Lane		
London Rd (Bridge to 795) Bus Lane		
London Rd (Star Road) Bus Lane		
Bath Road (Hounslow West) Footway Widening		
High Street (Pottery Rd) Bus Lane	Brentford	18 December 2020
High Street (Market Place) Bus Lane		
London Rd (Green School) Bus Lane		
Occupation Lane Access Restriction		
Chestnut Avenue Access Restriction		
Green Dragon Lane Access Restriction		
Whitestile Rd & Challis Rd Access Restriction	Businesses	21 December 2020 and 07 January 2021
Bath Road (Hounslow West) Footway Widening		
Turnham Green Terrace Access Restriction		
Devonshire Road Access Restriction	Chiswick North	8 and 18 January 2021
Chiswick High Rd (72-22) Bus Lane		
Chiswick High Rd (142-114) Bus Lane		
Chiswick High Rd (Windmill to Duke) Bus Lane		
Chiswick High Rd Westbound Bus Lane Heathfield Terr to Essex Place Sq		
Chiswick High Rd (578-466) Bus Lane		

	Turnham Green Terrace Access Restriction		
	Devonshire Road Access Restriction		
	Duke Road Access Restriction		
	Fishers Lane Access Restriction		
	Wellesley Road and Stile Hall Gardens Access Restriction	Chiswick South	11 and 14 January 2021
	Harvard Hill Access Restriction		
	Dan Mason Drive Access Restriction		
	Twickenham Road (Telephone Exchange) Bus Lane to Cycle Lanes	Isleworth	12 January 2021
	Twickenham Road (Town Field Way) Bus Lane		
	Amhurst Gds, Teesdale Ave & Teesdale Gardens Access Restriction		

Alignment with Council Policy and the Borough Plan

46. The objectives of these schemes are aligned to the council's Transport Strategy (the Local Implementation Plan), through measures that:

- Create safer and more attractive spaces for walking and cycling; and
- Reduce through traffic on residential roads, thereby creating low traffic neighbourhoods that are more conducive to active travel.


Conclusion

47. Whilst it is difficult to draw firm conclusions it would be reasonable to conclude there has been a limited traffic displacement effect, particularly on Burlington Lane/Sutton Court Road in Chiswick. However, the overall traffic indicates a significant reduction of traffic volumes across the majority of schemes. Bus journey times in the main have been reduced although this is not consistent across all schemes and time periods.

48. The majority of feedback that has been received expresses both objection to the schemes and clear desire for the schemes to be removed with immediate effect, but this would not accord with Council's stated policy position, nor is it supported by traffic analysis.

49. Air quality has been commissioned on a selection of specific schemes to assess their effect; the report demonstrates that the schemes' effect has been negligible.

	<p>50. It is therefore recommended that all current trial measures should be made permanent through the implementation of permanent Traffic Management Orders. It is also recommended that the proposed measures at Burlington Road and Staveley Road should be introduced under Experimental Traffic Management Orders.</p>
<p>Details of alternatives considered and rejected</p>	<p>At this juncture, the alternative to continuing these measures would be to remove or modify the schemes. Where the effects of the schemes have necessitated additional measures, such as at Burlington Lane and Chiswick School 'School Street' in Chiswick, new measures have been proposed. But there is no case for the removal of any of the measures, and this is therefore not recommended.</p>
<p>Factors taken into account (i.e. include here consideration of:</p> <ul style="list-style-type: none"> • public sector equality duty, • biodiversity duty and • crime and disorder implications of decision) 	<p>The council has to give due regard to its equalities duties, and in particular with respect to the public sector equality duty as provided in the Equality Act 2010, section 149.</p> <p>The equality factors have been considered through the Streetspace Equality Impact Assessment which is included as an Appendix to this report.</p> <p>If a restriction or prohibition in an ETMO is modified, then the council must commence a new six-month period of consultation if it is minded to consider, at the end of the trial, whether the effects of the ETMO should be made permanent. Because the maximum duration of an ETMO is 18 months, the effective deadline for the council to modify a scheme enacted under a ETMO is 12 months after the order is made. For this reason, best practice is to undertake at least one interim review ahead of any final review. A process of Interim and Final reviews and associated public engagement events was approved by Cabinet on 20 October 2020. However, due to the decision being called-in, it was not enacted until the 8 December 2020 meeting of Cabinet.</p> <p>Under section 122 of the Road Traffic Regulation Act 1984, the Authority has the duty, when exercising relevant functions, such as making Traffic Management Orders to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway. In making a decision, so far as practicable, the Authority shall have regard to (a) the desirability of securing and maintaining reasonable access to premises; (b) the effect on the amenities of any locality affected as well as the importance of regulating and restricting the use of roads by heavy commercial vehicles, (c) the national air quality strategy, (d) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles, and (e) any other matters that it considers relevant. In reaching a decision and carrying out its duties under</p>

	section 122, the Authority shall have regard to objections received in response to consultation.
Name and title of any Cabinet member consulted	<p>Cllr Hanif Khan – Cabinet Member for Transport and One Hounslow</p> <p>Cllr Katherine Dunne – Cabinet Member for Communities & Climate Emergency</p> <p>Cllr Guy Lambert – Cabinet Member for Recycling & Waste, Highways and Trading Companies</p>
Member conflict of interest	No
Comments on behalf of the Chief Financial Officer (Key decisions, where required under Financial Regulations and/or where considered by the Chief Officer in consultation with the Assistant Director Finance to be required)	<p>This report recommends that having taken into account feedback from consultations and data analysis certain schemes that formed part of the Phase 1 and 2a 'Streetspace' and 'School Streets' trails should be made permanent through the introduction of permanent Traffic Management Orders.</p> <p>It also recommends modifications to the Chiswick School 'School Street', an experimental Traffic Management Order be introduced at Burlington Lane junction with the A316 and a review of access restrictions be undertaken at Fishers Lane.</p> <p>All costs associated with the implementation of these decisions must be met from within approved budgets.</p>
Comments on behalf of the Head of Governance (Key decisions only and/or where considered by the Chief Officer in consultation with the Head of Governance to be required)	Contained within the body of the report.
Signed	
Date decision to take effect ⁴	27/08/2021

End

⁴ To allow for call in of a key decision by the Overview and Scrutiny Committee, a decision will not take effect until the eighth clear day after the date it is made.