

Independent Review of Public Engagement on Low Traffic Neighbourhoods in Ealing

Final Report, September 2021

This report, by Urban Movement Ltd, has been commissioned to review how Ealing Council has engaged with residents and other local stakeholders in connection with the Low Traffic Neighbourhoods that it implemented in the summer and autumn of 2020. The purpose of the review is to provide an independent assessment and to enable the Council to learn lessons that will guide future public engagement on similar and other transport schemes.

To that end, this review also reflects on the processes of public engagement that the Council has adopted for comparable schemes in the past, and brings forward recommendations for future practice in the light both of experience in Ealing and of an understanding of best practice from the work of others. For the purposes of this review, 'best practice' should be understood as meaning the activities and processes most likely to achieve the best outcomes, not merely those required to meet legal obligations.

The review process has involved interviews with Council officers and elected members having different roles, responsibilities and perspectives; and has also involved examination of published reports, guidance and other relevant documentation.

The report is presented in six sections. The first three cover three sequential times periods: prior to the COVID-19 pandemic; between the beginning of the pandemic and the implementation of the LTN schemes; and the period since the implementation of the LTN schemes. The fourth section presents a summary of sources best practice guidance in relation to public engagement on schemes like LTNs; the fifth takes the opportunity to reflect generally on the preceding sections; and the final section presents recommendations for future practice.

A Ealing practice prior to the COVID-19 pandemic, and some general themes

- 1 Prior to March 2020, there were no guidelines or other formal standards/approaches for public engagement on transport and related proposals in Ealing. The nature and quality of engagement varied from project to project according to (a) the views and experience of the projects leader(s) in the specific context, (b) the requirements of project funders (specifically TfL), (c) the resources available – both time and money, and (d) whether or not there were informal engagement protocols for the specific type of project in question.
- 2 CPZs were, in practice, the only type of project in category (d). That there was established working practice for CPZs (if no formal guidelines) relates to the fact that they are quite straightforward and homogenous in character and that officers have become familiar with implementing them over the years. In short, they have become quite routine.
- 3 For the same reasons, CPZs have become the only kind of transport-related scheme with which the public at large in Ealing has developed any real familiarity in relation to public engagement. (This factor assumed significant importance during the pandemic – see B27.)
- 4 By contrast with CPZs, other types of transport-related scheme are more diverse, complex and context-sensitive. Accordingly, the public engagement that accompanies them is usually customised to the requirements of the specific case. This is not necessarily a problem, as there are good reasons why design and engagement should be context sensitive. However, it can easily become a problem if there are no adopted general principles to guide specific engagement exercises.
- 5 Overall, reflecting on the consultation/engagement exercises associated with a range of pre-pandemic transport schemes in Ealing, it would be reasonable to describe the majority as technocratic (i.e. top-down, based on technical expertise). Other than in the cases of the ongoing West Ealing Liveable Neighbourhood initiative, and the prior engagement (in 2019) to support the funding bid to Transport for London (TfL) for the Ealing Town Centre Liveable Neighbourhood

scheme, the extent of co-design or co-creation in the Council's recent approaches to public engagement in the area of transport and highways has been limited. The cross-council project Let's Go Southall, which aims to increase physical activity and incorporates active travel measures such as cycle training and loan of bicycles, is also a good example of collaboration with a wider partnership group.

- 6 The Council's Transport Strategy (adopted 2019), though exemplary in many respects, makes no direct reference to consultation or engagement practice. While it does recognise the importance of better communication with the public, and other stakeholders, this does not feed into any specific proposals for action in respect of engagement; and the references that are made to communications could be construed as reinforcing the technocratic approach. Section 6.3 (Stimulating Mode Shift to Active Travel Modes) states that:

"Many people are currently choosing car travel for their journeys because of the real and perceived benefits from car travel in terms of time, cost, comfort, reliability and image. The transport strategy must therefore address these factors to encourage behaviour change to more efficient travel choices. However, it is recognised this will not be easy, as... progress to incorporate change has been slow mainly due to fear that public attitudes and behaviours will not tolerate anti-car measures. This is borne out by... the results of public consultations on transport projects where the single biggest reason for objection to proposals is loss of car parking. However, the time has come for change, and this means that public policy also has to be stronger and better communicated."
- 7 Section 7.3 (Provide a More Efficient and Safe Transport Network: By Reducing Traffic Congestion) states that "Where the Council can help is to provide a consistent message of the benefits of active travel and the issues with excessive car journeys. A communications/marketing plan has already been developed for the Council's "Get moving" campaign, and this transport messaging will piggy-back on that".
- 8 Policy Goal 1 of the Transport Strategy is 'To increase active travel modes within the Borough through improved infrastructure for walking and cycling and behavioural change activities'. Only one of the thirteen Policy Actions for this Goal relates to public engagement, and this again relates to communications, rather than participation: 'To utilise the Council's and partners' marketing and communications to extoll the benefits of active travel to residents and businesses'.
- 9 Communicating effectively with the public about the 'Why?' of change is indeed very important (see later in sections B and D) and it is for this reason that the Council was, in the early spring of 2020, actively seeking to appoint a comms officer with specific responsibility for transport, highways and climate change initiatives.
- 10 As important as good communications are, however, they are only a part of the public-facing engagement activity needed if the best outcomes are to be achieved. If the rationale for/benefits of schemes is only 'handed down' by the Council, and if there is no opportunity for people to ask what they think are reasonable questions, or for people meaningfully to engage in the 'What?' (i.e. the schemes/options themselves) that follows from the 'Why?', then opportunities to design measures in the light of local knowledge, and to build public consent/support for those measures, will be missed.
- 11 It is worth reflecting on the concern, often expressed in the past few years, that the public has come to lose its respect for 'experts'. This concern was, at least in part, triggered by Michael Gove's comment, in the run-up to the 2016 Brexit referendum, that "people in this country have had enough of experts". Whether or not he was being disingenuous in later qualifying this comment, it may well be that the issue is less that people have had enough of experts *per se*, than that they do not like being talked down to by people who assert (or seem to) that "We know best".

- 12 This factor relates to the first of the following three themes, in familiar the fields of behavioural economics and change management, which are relevant to public engagement on schemes like LTNs:
- *The Pratfall Effect* – short-hand for the fact that people generally prefer authenticity from their experts and respond better to technical professionals who don't come across as 'know-it-alls'.
 - *Loss Aversion* – the fact that people generally feel loss far more intensely than they feel gain, meaning that they value what they're sure are disbenefits over the benefits they're promised.
 - *Social Proof* – which refers to the fact that people who aren't sure what position to take on a given issue tend to adopt that already taken by others; meaning that a 'groundswell of popular opinion' can easily stem from the early, vocal position taken by just a few individuals.
- 13 Each of these three themes can be seen to be active in the public response to the implementation of LTNs (in Ealing and many other places) in 2020. In Ealing, these themes had far-reaching effects partly because public engagement practice prior to the pandemic had not generally sought active public participation (co-design) in scheme development, and partly because – despite good intentions – communication with the public on the need for travel behaviour change had, up to that point, been limited.

B Engagement and related activity from the start of the pandemic to the implementation of the LTNs

- 14 On 16th March 2020, as a measure to limit the spread of COVID-19, the Prime Minister announced a ban on all non-essential travel. The following week, on 23rd March, he ordered what became known as a national ‘Lockdown’. Amongst many other things, these announcements meant the following.
- The opportunity for data collection to provide a clear baseline/‘before’ case for any transport schemes had, for the time disappeared.
 - The need for measures to enable active travel and promote social distancing, in the context of the immediate crisis and the planned recovery suddenly accelerated.
 - The ability to engage directly with the public became seriously compromised, with online tools being a poor and (in the early months) poorly understood substitute for in-person events on site. (These tools were also, and remain, difficult or impossible for some to access reliably.)
 - The ability for officers to collaborate with one another – e.g. on scheme definition, scheme design, engagement protocols and a supportive communications strategy – became a significant practical challenge at precisely the time that the most seamless collaboration was required. (The use of online tools required rapid changes in working practices, and even though familiarity with the use of Microsoft Teams grew rapidly, they did and do hamper the natural flow of discussion, the ability to raise quick points of clarification, the opportunity to ask quiet questions on the way out, and the chance to ‘pop round’ to a colleague’s desk for follow-up afterwards.)
- 15 In short, the need for officers to work in the best-informed and most joined-up manner possible, under unprecedented pressures and at unprecedented speeds, coincided with circumstances that worked against each of these requirements.
- 16 In addition, it is important to bear in mind (a) that many officers had a range of completely new responsibilities arising from the pandemic, all of them pressing, and (b) that the funding, and timing of funding, for transport schemes became highly uncertain.
- 17 In respect of the latter, on 1st May, TfL was obliged to suspend all previously-agreed Local Implementation Plan (LIP) funding for local transport schemes. Although a revised funding programme, the London Streetspace Plan (LSP), was established shortly afterwards, this inadvertently became something of a time-pressured ‘money-grab’.
- 18 Interim Guidance to Boroughs on the LSP was issued on 15th May, and this made plain that boroughs’ bids for schemes to be funded by the new LSP funding pot should cover the following three objectives: reallocation of road space (to enable social distancing); delivery of strategic cycle routes (using temporary materials/‘light segregation’ and traffic restrictions; and LTNs. The Interim Guidance also emphasised the need for speed: “All projects that form part of this programme must demonstrate an urgent and swift response to the crisis and should be implemented as soon as possible”. The total LSP funding pot was later clarified to be £45m for the period April-September, and councils were urged to submit bids for schemes that met these objectives.
- 19 On 1st June, Ealing made its first application for funding, although this did not include any LTNs. On 4th June, boroughs received an update letter from TfL stating that £6.3m of the £45m had already been allocated to 10 councils and that, further bids totalling £35m had been received from 16 boroughs. The letter re-emphasised the general need both for speed and for schemes to be cheap to install, stated that TfL would now be moving to a weekly allocation of funding, and advised that “If we collectively underspend, across London this may well influence the DfT (Department for Transport) thinking on the next rounds of financial discussion”.
- 20 This, unsurprisingly, had an undesirable effect in relation to the amount of time that was given to the detail of what the money the Council bid for would actually be spent on.

- 21 Furthermore, and at broadly the same time (during May), the government/DfT issued a number of announcements concerning revised guidance (much of it statutory) relating to such important matters as changes to how Traffic Regulation Orders could be advertised and to the requirement for local authorities to take measures to reallocate road space to people walking and cycling, both to encourage active travel and to enable social distancing. Amongst the measures specified in updated statutory guidance for local authorities entitled 'Reallocating road space in response to COVID-19' (Traffic Management Act 2004: network management to support recovery from COVID-19) issued on 9th May were:
- “Modal filters (also known as filtered permeability); closing roads to motor traffic, for example by using planters or large barriers. Often used in residential areas, this can create neighbourhoods that are low-traffic or traffic free, creating a more pleasant environment that encourages people to walk and cycle, and improving safety.”
- 22 Funding for COVID-related active travel schemes was potentially available from three principal sources: (a) the LSP, via TfL; (b) the DfT's Emergency Active Travel Fund; and (c) The Reopening High Streets Safely Fund, via the MHCLG. Each of these funds were of different sizes, were potentially for different types of measure, and had different bidding criteria and timescales. The funding environment for active travel measures in May/June 2020 was complex and somewhat arcane.
- 23 All of these changes in relation to working practices and to the nature and speed of work required, added to the general and specific (funding) uncertainty, made the definition, design and public engagement on schemes like LTNs extremely challenging even for the best resourced and best prepared local authorities.
- 24 Prior to the pandemic, a small number of London Boroughs (such as Hackney, Lambeth, Waltham Forest and Camden) were ahead of others in terms of their previous experience of having implemented LTNs (or similar schemes) and/or the number of such schemes that were already under active consideration. Accordingly, these Councils had more in the way of tried-and-tested general practice for public engagement for LTNs and, for many schemes under active consideration, had undertaken data collection exercises before March 2020.
- 25 In many respects, Ealing wasn't far behind. For example, consultation for what became LTN08 (Olive Road) was about to be launched just as the pandemic arrived, and a good deal of relevant data had already been collected. In West Ealing, exemplary public engagement on the Liveable Neighbourhood proposals was well advanced with, again, a comprehensive data collection exercise having been undertaken.
- 26 Unfortunately, COVID-19 coincided almost exactly with the beginning of a financial year that would have seen LIP-funded feasibility studies and surveys undertaken for a number of LTNs and other active travel schemes. Not only were many of these schemes suddenly required to be accelerated, both in terms of design and engagement, they had to be progressed in the absence of the detailed data collection that would otherwise have been undertaken to establish a baseline from which monitoring and measuring of impacts could be made.
- 27 This combination of circumstances was obviously, as has been said, extremely challenging. Ealing's response to the challenge – specifically with respect to engagement with the public on the proposed LTNs – was further affected by the following:
- The Council had no formal corporate guidance on undertaking engagement exercises that sought to *work with* local communities to achieve change. Accordingly, engagement has been undertaken on a project-by-project basis as deemed appropriate by the responsible officers.
 - Despite having acknowledged the likelihood of opposition to schemes like LTNs, it did not have sufficient corporate experience of effectively and consistently communicating the benefits of measures that would require people to change their travel habits.

- There was a failure to recognise that, in so far as there was public knowledge of any consistent approach to Council engagement on transport issues, this related primarily to that adopted for Controlled Parking Zones (CPZs).
- This, in turn, meant that there was limited foresight that people might consider the form of consultation adopted for the LTNs – a trial scheme supported by an Experimental Traffic Order (ETO) – to be unreasonable. (“You usually ask us; but now you’ve just done it without asking.”) This allowed the idea that the measures had been imposed ‘undemocratically’ – though untrue – to gain credibility.
- There was lack of clear responsibility for different parts of the programme and overall leadership at officer level in what rapidly became a very hostile and challenging environment. The work involved officers from both the Transport and Highways teams, who though they had very good working relationships, were located in different Directorates (one responsible for developing policy and one for implementation). The diverse nature of the work needed to define, design and implement the LTNs was spread across both teams, as is the situation for most transport related schemes, but neither was charged with overall responsibility. The Director of Place Delivery came into post during the first Lockdown, as part of a review across the Place Directorate. A subsequent restructure within Place Delivery saw the post of Assistant Director Transport, Highways & Parking established at the end of 2020, overseeing both policy and implementation. This role was covered by an interim until the recruitment of a permanent post-holder.
- The work of the Transport and Highways teams was not embedded in the work programme of the Council’s Communications team to enable forward planning at a time when there were competing priorities and with the urgent need for the Communications team to focus on a variety of immediate tasks related to the pandemic. A focus by officers from all teams on the immediate tasks before them meant that the communications aspect of engagement on the implementation of the LTNs was not given the level of co-ordinated attention it required.

28 Although the word ‘unprecedented’ quickly became over-used as a description for the circumstances under which we all lived after the arrival of the pandemic, it is nevertheless also entirely apt as a description of the circumstances related to the funding, design and delivery of the Council’s transport and highways programme, and to the constraints on associated public engagement, that existed from May 2020 onwards. The key events that unfolded in May, June and July 2020 therefore need to be understood in the context that officers were required to do more and implement more quickly with less money, little or no baseline data, and no opportunity for public meetings.

29 The suspension of TfL’s LIP funding programme on 1st May (B17) was followed on 4th by a meeting of Ealing officers to discuss the implications and, on the 6th, by the official launch of TfL’s London Streetspace Plan. On 9th May, the government issued new statutory guidance for local authorities (B21) which stated that,

“The government... 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... 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.”

The measures in question explicitly included LTNs. The new statutory guidance was followed by a related announcement from the Secretary of State for Transport on 11th May and a letter from the DfT on 12th May.

30 Between 12th and 22nd May, several internal technical officer meetings took place to consider which schemes could be brought forward to comply with the government guidance and with the LSP Interim Guidance to Boroughs (B18).

- 31 It should be noted that although TfL's Interim Guidance acknowledged that TfL needed to work with Boroughs to "ensure that local residents and community stakeholders are informed, brought into the recovery approach, and contribute knowledge and feedback" and stated that "decisions to award projects funding will (consider) the level of community support and engagement", it was silent on advice as to how meaningful public engagement could be undertaken in the context of the need to "demonstrate an urgent and swift response to the crisis".
- 32 On 21st May, all Councillors were sent an email with a brief description of the new LSP arrangements and stating that officers had been working on a list of some 200 potential projects across the Borough and were about to start prioritising these and applying to TfL for funding. The email invited members to help identify further schemes and to pass on any suggestions they received from residents that the members believed might fit the criteria. It also noted that some councillors had already sent in a few ideas. The email closed by saying that, "Over the coming weeks, officers will be e-mailing you with measures which you may want to comment on prior to the application".
- 33 On 1st June, officers submitted the Council's first LSP funding application to TfL and, on 2nd June, officers briefed the Council Leader and the portfolio holder for Environment and Transport on progress to date. Both were consistently supportive of the implementation of the programme of emergency active travel measures.
- 34 On 4th June, the Council received the letter from TfL that prompted an acceleration by officers of the scheme selection and funding bid process (see B19 above). The second LSP funding application was subsequently sent to TfL on 8th June, and this included bids for nine separate LTNs. Six of these had not been the subject of any specific investigation prior to the pandemic, and three covered areas where there had been some previous work.
- 35 The six schemes in the first category were
- LTN30 Loveday Road
 - LTN32 Junction Road
 - LTN33 East Acton Golf Links
 - LTN34 Bowes Road
 - LTN35 Mattock Lane
 - LTN48 Adrienne Avenue
- and the three schemes in the second category were
- LTN08 Olive Road
 - LTN20 West Ealing North
 - LTN21 West Ealing South
- 36 As mentioned above (B25), public engagement for the Olive Road area was due to commence as the pandemic struck, while LTN20 and part of LTN21 were covered by the previous work on the West Ealing Liveable Neighbourhood. The other six schemes were brought forward through a process of long-, medium- and short-listing that had its genesis in a high-level exercise previously undertaken to inform the Councils bid for LIP funding for 2020/21.
- 37 This initial borough-wide desktop exercise had sought to identify where LTN-type measures could potentially be feasible in terms of their likely effects on the wider transport networks and of their value in creating a cohesive walking and cycling network. The LTNs considered most potentially valuable from this long-list were placed on a 'medium'-list of LTNs that was part of Appendix A to a 16th June 2020 Cabinet report, 'Active travel and social distancing measures in response to Covid-19 and to aid economic and social recovery from the Covid-19 pandemic'. A caveat noted that the scheme list was "a working document that will evolve over time" not least because "suggestions by councillors and residents have and continue to be welcomed and are being considered as part of the

programme; and some schemes may be found to be more difficult than first thought as it progresses through the assessment and design process, so may drop off the list”.

- 38 A funding application featuring nine schemes had been submitted to TfL a week before the Cabinet report was considered and that some proposed schemes had different names in the funding application and the Cabinet report due to submission deadlines. The LTN medium-list had, clearly, already been resolved into a shorter list through a further desktop exercise by officers, incorporating local knowledge of opportunities and constraints and a review of previous and more recent requests for traffic management measures from members, ward forums and individual residents. These short-listed LTN schemes were then subject to an initial design exercise by the officers in order to identify how many filters would be needed, and where, to create an effective LTN.
- 39 On 17th June, Councillors in the proposed LTN wards were sent an email briefly setting out the background and saying that “we have submitted a funding bid to carry out several Low Traffic Neighbourhoods, one of which is in your ward – please see the map attached for further details”. There was a caveat that the map (of the initial design) was “not a technical drawing so individual locations and positions of barriers may alter slightly”. The email closed by inviting queries but stating that “the intention is to implement the scheme unless you have any strong objections”.
- 40 Though a good idea in principle, especially under circumstances that prevented rich public engagement, this briefing had unintended consequences that proved to be extremely unfortunate in relation to the public response to the LTN proposals. The provisional plans were shared with local residents and, unsurprisingly, a focus on specifics provoked adverse responses from people who could easily grasp that some of their existing car journeys would be made less convenient but were unclear, sceptical or otherwise unaccepting about the gain that might justify the pain (see *Loss Aversion* in A12).
- 41 It was at this point that the Council can be said to have lost control of the public narrative on Ealing’s LTNs. The negative reaction dominated discourse on social media and in other local media and, regrettably, the Council had not prepared any material that could be used either to explain the need for or benefits of the LTN proposals or to counter the concerns being expressed.
- 42 Notwithstanding the largely negative public discourse that had begun, the release of provisional scheme details did also have the intended positive effect of generating constructive comments that enabled designs to be modified. These related to relatively minor details and to higher order issues such as whether it should be impossible to drive through an LTN or whether indirect routes through some of the larger LTNs should be permitted. Perhaps unsurprisingly, people who lived on possible through routes did not like the idea, fearing that their streets would become busier, not quieter, partly because of the effect of route-finding apps like Waze. The decision was taken that the final designs should completely exclude all through traffic.
- 43 On 22nd July the first LTN (LTN48 Adrienne Avenue) was implemented with the second (LTN34 Bowes Road) following on 23rd July. That was also the day when the relevant Ward Councillors were sent details of the final designs for the other LTN(s).
- 44 Returning to the matter of the public perception of the LTNs from 17th June onwards, a number of factors can be seen to have come into play, and all relate in some way to the fact that the Council failed to frame a convincing narrative in the public domain. For example, exacerbating the issues of perception associated with the premature release of the initial design drawings was the fact that some of them contained simple errors (e.g. street names and misplaced landmarks). There was also the fact that an LTN initially proposed for the Airedale Road and Bramley Road area was withdrawn by the Council because of concerns that planned roadworks associated with gasworks would lead to too much traffic being displaced onto other roads. This raised questions about basic competence (“If you knew the roadworks were happening, why did you propose the scheme in the first place?”) and,

at the same time, seemed to suggest that the Council also recognised an issue that detractors had also raised – that of the simple displacement of traffic from some streets onto others. Queries were also raised about the rationale for LTN33 (East Acton Golf Links) somehow dropping off the list while LTN25 (Acton Central) seemed to appear out of nowhere.

- 45 Despite the Council having had advance warning that the implementation of the LTNs would likely be met with loud and hostile opposition, the programme of implementation went ahead more or less as originally planned and with no concerted effort to regain control of the narrative. Although there were numerous mitigating circumstances (see B27 and B28 in particular), the Council could have been more proactive in addressing the concerns that had been raised. Specifically, since the Council was required to send a letter to each address in every LTN, as part of its duties in relation to the relevant Experimental Traffic Order (ETO, see B27), this could have been used as an opportunity to give all residents a comprehensive information pack about what was proposed and why, including FAQs and addressing any misinformation that had been circulating.
- 46 As it was, what residents of all LTNs received was a two-page letter, identical but for the name of the LTN, that was entitled “Temporary measures to improve public safety” and accompanied by a basic black-and-white diagram of the LTN. This was posted to them exactly a week before their LTN was due to be implemented – the legal minimum notice required by the ETO.
- 47 Although it attempted to make a basic case for LTNs, the letter did so without conviction and without producing evidence of the stated benefits. In addition to the fact that the letter constituted information, rather than engagement, there were a number of avoidable weaknesses in its content. One was the emphasis laid on ‘rat-running’, despite the fact that many streets in the larger LTNs carried little or no such traffic. Related to this was the impression given that LTNs are a kind of one-size-fits all response, when the truth is that each one is different, sometimes markedly so, and that the justification for and benefits of each are therefore also different.
- 48 As an example, LTN48 (Adrienne Avenue) is comparatively small and has a very simple purpose: to prevent through traffic using Adrienne Avenue and one of three other streets (Woodstock Avenue, Kenilworth Gardens and Neal Avenue) to avoid having to queue northbound on Lady Margaret Road to turn left onto Ruislip Road. There are only two other streets in the LTN48 (Coraline Close and Frensham Close). By contrast, LTN21 (West Ealing South) was very large and only a small proportion of its streets could be said to have had an appreciable ‘rat-running’ problem. However, the very size of LTN21 offered far greater potential in terms of the wider objectives of LTNs. By making such a large area much safer and more pleasant to walk and cycle in, and less convenient to undertake short car trips to/from, LTN21 had the power to achieve a meaningful shift to active travel modes by residents within it. The case/narrative for the Adrienne Avenue and West Ealing South LTNs were therefore entirely different; but this was not at all reflected in the material distributed before their implementation.
- 49 The letter also failed to acknowledge and then address the concerns that some had already expressed that the implementations of LTNs was ‘undemocratic’ because people had not had a prior opportunity to say yes or no to them. The material could have explained that LTNs are comparatively complex schemes designed to achieve important policy goals – not merely to enable residents to be able to park more easily, and this meant that introducing trial schemes under ETOs made best sense in terms of everyone being able to take a view based on experience rather than on hopes or fears.
- 50 Furthermore, for the more complex schemes, the simple black and white map was inadequate in terms of enabling residents to work out how they should change the routes they followed to get to and from their home. This problem was magnified for drivers of delivery vehicles or taxis seeking to reach local addresses and not being able to take what had previously been the most direct route.

- 51 Other weaknesses with the letter included the fact that it seemed to lean too hard on the pandemic as a core justification for the LTNs, without addressing the predictable concern that many people would have along the lines of “You’re making it harder for me to get around by car at just the time we fear to use public transport”. Neither did the letter directly address another issue that could have been foreseen, and had previously been raised in the context of the putative Airedale/Bramley LTN (B44), that many people think of traffic as a ‘zero sum’ game: that there is a fixed amount of it (i.e. that mode shift will not happen) and that if it’s excluded from some streets it will all inevitably be distributed onto neighbouring streets.
- 52 The letter distributed to LTN residents did little more than the very minimum in terms of enabling the public to change with the need for and the effects of each LTN, and this must be considered a missed opportunity. The dissemination of the draft LTN plans after June 17th got LTNs off to a bad start in terms of public perception, and this should have been a prompt to the Council to take concerted action to try and regain the initiative. However, although there was then a month until the first of the LTNs was implemented, and over two months in the case of the majority, this time was not used effectively in terms of the public engagement or communications aspects of the LTN programme. At the time, the Council was involved in significant reactive work rather than being focused on a more proactive approach to communications and engagement.
- 53 Prior to the posting to residents of the leaflet in mid-November (see C60), the only information that the Council provided about LTNs was on its website. Although much of this information was well drafted in its own right, it required people to take the initiative to click through to it somehow, and this process, together with the visual aspects of the web pages themselves cannot be said to be especially user-friendly. In terms of formal channels by which residents and others could engage with the Council directly, this was limited to email communications. Two different email addresses were provided for this purpose, another example of a process that was technically correct but failed to meet people’s expectations. (Only one email address was used from November 2020.)
- 54 In closing this section, it is appropriate to observe that the hostility of opposition to LTNs on the part of some people manifested itself in often vitriolic discourse on social media and in numerous acts of vandalism, focused on the traffic filters. Bollards were stolen, planters were overturned, plants were destroyed, slogans were daubed, and oil was even spilled on one occasion. This naturally created an environment in which people feared openly to voice supportive or constructive views.

C Engagement and related activity from the implementation of the LTNs to date

- 55 This review has focused on the process and events covered in section B, in the light of the background presented in section A, because it was in the months from May to July/August that the main mistakes can be observed, in terms of public engagement and communications, and from which the principal lessons can therefore be learned. However, it is also worth exploring the events of the past 12 months to see what else can be learned. Because these events were fewer and less intricately linked, these can be covered more briefly than those in section B.
- 56 Each LTN was the subject of a separate ETO which allowed the LTN to be operational for up to 18 months before needing to be made permanent or removed. The two-page letter distributed to residents a week in advance of implementation stated that “Unlike our normal schemes, the statutory consultation will take place during the first 6 months after the temporary scheme is installed”. However, the fact that LTNs as a whole had become a controversial topic, meant that the Council needed somehow to respond to the public criticism, and to the reasonable demands for evidence of success, within a common time-frame.
- 57 While the need for evidence of success (or failure) was clear to all, whether supportive of or antagonistic to the schemes, a number of key factors worked against the Council’s ability to inform the case for success/failure. These include the following.
- The only baseline (‘before’) data that existed was for those LTNs that had, fully or partly, been under previous consideration.
 - The numerous effects of the pandemic on travel behaviour, the frequent changes in ‘lockdown’ levels, and the partial/full re-opening/closing of schools, made it impossible to establish a meaningful post-implementation (‘after’) scenario to compare with the baseline.
 - It was similarly impossible to obtain data in the ‘after’ period that could be used to make a case that conditions had become better or worse.
 - There was a particular gap in the knowledge of levels of walking and cycling before the pandemic, arising from the fact that these are simply harder to measure and that conventional traffic surveys tend to focus on motorised traffic flows. This meant any new counts of walking and cycling could not be used to compare pre- and post-LTN activity.
 - The Council had not established any clear ‘key performance indicators’ for LTNs from the outset.
- 58 Notwithstanding these challenges, the Council began to obtain the best evidence available, bringing together as much pre-pandemic traffic data as it could find, including from TfL and DfT sources, and purchasing other relevant traffic data from third party sources (telematics providers). This data was to be used to inform an interim report on the LTNs to be considered by the Cabinet on 8th December 2020.
- 59 In addition to traffic data, the interim report would cover the views of the public on the LTNs. To augment the comments that were received by email, the Council set up a new, interactive engagement portal using the Commonplace platform, and this went live on 23rd October. While a far superior means of engaging meaningfully with the public than the static email process, it still did not allow the Council to understand the extent to which the views expressed were representative of the population at large. This is a concern that can only be addressed through randomised interview surveys.
- 60 In mid-November, the Council began distributing an information leaflet – ‘Low Traffic Neighbourhoods: Less Traffic, Better Streets’ – to all addresses within all LTNs. This was professionally and attractively put together, made a much better case for LTNs than the original two-page letter, and included much better and more useful maps of each LTN area. It would have been very helpful if something along these lines had been produced and distributed prior to the implementation of the LTNs.

- 61 Indeed, had it been possible, the type of information within the leaflet could have formed two prior leaflets. The first could have made the general case for LTNs and other active travel measures in the context both of the Council's established policy (on climate change, sustainable transport, public health, etc.) and of the special circumstances of the pandemic. The second, released later, could have shown the proposals for the specific area in appropriate and explained the likely pros and cons, along with an explanation of a trial scheme as the best form of engagement.
- 62 Just before this leaflet was distributed, on 13th November, the government published a further update of its statutory guidance for local authorities entitled 'Reallocating road space in response to COVID-19'. Responding to widespread adverse reaction to the implementation of emergency active travel measures across the country, this update strengthened the government's advice on consultation and engagement. This advice was then incorporated in the 'Guidance for engagement and consultation on new LSP schemes' published by TfL on 18th December. It will be recalled that the original Interim Guidance to Boroughs on LSPs published on 15th May did not provide any specific guidance on these aspects (see B31).
- 63 This new document outlined the approach that TfL and boroughs should take when engaging and consulting with the public and relevant stakeholders about new LSP scheme, and the guidance stated that "this approach applies to new Streetspace schemes introduced by London boroughs and TfL after 1 January 2021". With hindsight, it would have been helpful were such guidance contained in the May 2020 document.
- 64 The interim report was duly considered at the Cabinet meeting on 8th December. This presented the summary of public responses to LTNs shown in the following table.

Method Received	Support	Opposition
COVID Transport inbox	177	491
Traffic Notices Inbox	363	818
Commonplace ³	994	3422

Although this presents a picture of opposition outweighing support, it was not possible to report on how representative the views expressed were of the population at large. The report noted the vast majority of the feedback received was not specific to a particular LTN or to the operation or design of the LTNs, but rather related to general opposition to or support for the principle of LTNs.

- 65 The five most common general concerns/objections raised by members of the public were:

- Lack of prior consultation
- Impacts on emergency service vehicles
- Impacts on boundary roads (specifically on making both congestion and air quality worse)
- The potential effects on people with disabilities
- Longer car journeys and journey times

Such evidence that people cited in support of these objections was very largely subjective and/or anecdotal. Many of the assertions made did not tally with the objective evidence that the Council had obtained, and which was presented elsewhere in the report.

- 66 The interim report contained a number of recommendations for changes, the most far-reaching were those to replace the removable bollards at each traffic filter within all LTNs with camera enforcement, and to exempt blue badge holders from camera enforcement within the LTN that they live in. These changes were accepted, with the latter requiring a modification to all the ETOs affected.
- 67 Subsequently, the Council prepared new ETOs, with the same new start date, for each LTN area. A letter entitled 'Proposed Changes to LTNxx' was then delivered to all addresses within all LTNs on

19th January 2021. Following implementation of the changes in February, the six month review date for the new ETOs was set as mid-August.

- 68 In March, TfL issued two new guidance documents: ‘Interim guidance for delivery using temporary and experimental schemes’ and ‘Interim monitoring guidance for boroughs’. Throughout the spring, the efforts of officers remained focused on gathering evidence and, while the email and Commonplace channels for public commentary remained open, there were no new communications or engagement initiatives.
- 69 Reflecting on events in 2020, officers prepared plans to undertake representative interview surveys and stakeholder focus group sessions to better understand public attitudes and the wider benefits of streetspace schemes, including concerns from specific groups. These plans were subsequently paused pending further review.
- 70 On 18th May, a new Council Leader was elected and a new Cabinet formed. On 21st May, LTN21 (West Ealing South) was removed without prior notice. Although there had been criticism of LTN21 through the email and Commonplace channels, the reason given for removing the scheme was that Hounslow Council was closing Swyncombe Avenue to eastbound traffic on 24th May for at least two months for road works.
- 71 In announcing the removal of LTN21, the new Leader stated that the Council promised to listen to local people’s views on active travel initiatives like LTNs, and that the remaining LTNs would be subject to a ‘CPZ style’ consultation, with a vote for local people on whether they think the LTNs will work in their neighbourhoods. The Leader reiterated the Council’s commitment to tackling the climate emergency and enabling active travel and cycling, while also stating a commitment to “giving local people control over change in their neighbourhoods” and commenting that “we know we must take people with us”.
- 72 In keeping with the above, the Council launched a new consultation exercise on LTNs, using the Survey Monkey Tool, which ran from 1st to 23rd July. This invited local people and businesses from the areas of the eight remaining LTNs “to have their say through a final non-statutory consultation” on whether to make the schemes permanent; and also on whether to reintroduce the north-western part of what had been LTN21 (the Deans Road and Montague Avenue area) on a permanent basis.
- 73 The Council announced the findings of this consultation on 16th August. The table below summarises the responses received.

LTN AREA	Residents of LTN		Boundary roads		Others		All responses	
	Support	Oppose	Support	Oppose	Support	Oppose	Support	Oppose
Olive Road LTN08	34%	63%	10%	90%	16%	83%	19%	80%
West Ealing North LTN20	21%	79%	13%	87%	12%	87%	13%	86%
Acton Central LTN25	16%	82%	5%	92%	12%	87%	13%	86%
Loveday Road LTN30	25%	73%	31%	67%	14%	85%	20%	79%
Junction Road LTN32	31%	67%	7%	92%	13%	86%	18%	81%
Bowes Road LTN34	33%	58%	50%	50%	13%	86%	14%	85%
Mattock Lane LTN35	25%	70%	24%	75%	14%	85%	15%	84%
Adrienne Avenue LTN48	70%	27%	20%	80%	12%	88%	14%	85%
Deans/Montague (part of former LTN21)	61%	38%	6%	93%	15%	84%	22%	77%

- 74 In responding to these findings, the Council announced that it proposed to move forward with making permanent the two LTNs that were supported by a majority of residents who live within the area in question: LTN48/Adrienne Avenue and Deans Road/Montague Avenue. In noting that the other trial LTNs were not supported by a majority of residents who live within those areas, the Council said that a final decision on those schemes would likely be taken at the Cabinet meeting in September, “once full data has been gathered to meet new Government requirements which were only introduced at the end of July”.

- 75 These “new Government requirements” were introduced on 30th July. The chief document in this regard was the latest update to statutory guidance: Traffic Management Act 2004: network management to support recovery from COVID-19. In the Foreword to this, the Secretary of State for Transport wrote that:

Remarkable work has been done by many authorities, achieving significant change in a short period. A few, however, have removed or watered down schemes, sometimes within a few weeks or days, or without notice, or both. Of course, not every scheme is perfect, and a minority will not stand the test of time. But we are clear that schemes must be given that time. They must 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.

We have no interest in requiring councils to keep schemes which are proven not to work. But that proof must be presented. Schemes must not be removed prematurely or without proper evidence. And any decisions on whether to remove or modify them must be publicly consulted on with the same rigour as we require for decisions to install them. This guidance lays out new standards for consultation, including the use of objective methods, such as professional polling, to provide a genuine picture of local opinion, rather than listening only to the loudest voices.

In this way, we will do what is necessary to ensure that transport networks support recovery from the emergency and provide a lasting legacy of greener, safer travel.

- 76 This new statutory guidance was accompanied by a letter to all local authorities from the Minister of State for Transport. This included a reminder that, in his letter of 13th November 2020, the Secretary of State had stated that, since the peak of the emergency had passed, the government now expected local authorities to consult more thoroughly. It also reminded authorities that the November 2020 update to the statutory Network Management Duty guidance stated that measures should be “taken as swiftly as possible, but not at the expense of consulting local communities”, and that “local residents and businesses should... be given an opportunity to comment on proposed changes” to schemes. The Minister then added, “Please note these requirements also apply as much to the removal or modification of existing schemes as to the installation of new ones. In many cases where schemes have been removed or modified, there appears to have been little or no consultation”.
- 77 Of direct relevance to the present situation regarding Ealing’s LTNs, the Minister concluded his letter as follows:

Premature removal of schemes carries implications for the management of the public money used in these schemes and for the Government's future funding relationship with the authorities responsible. The Department will continue to assess authorities’ performance in delivering schemes and, following the precedent we have already set, those which have prematurely removed or weakened such schemes should expect to receive a reduced level of funding.

We are also publishing updated Network Management Duty guidance on this subject (see C75), describing in more detail the obligations of authorities to allow adequate time to evaluate schemes and to engage with local people and protected groups using professional opinion surveys, including on any proposed removal. Authorities which are proposing to remove or weaken schemes should not proceed with their plans unless they are satisfied that they have had regard to the guidance.

- 78 It follows that the time period during which it is desirable for the Council to learn lessons from a review of its public engagement practice as it relates to the 2020 LTNs, and to act upon them, is now much shorter than that envisaged when this review was commissioned.

D Sources of best practice guidance on public engagement for LTNs and similar schemes

79 Other than the guidance provided by the government and TfL in relation to the LSP (see C62), there are relatively few published sources of guidance and information concerning public engagement on schemes like LTNs. Those that have been consulted to date as part of this review are:

- a) How to Talk to People about the Future of Their Streets (rethinking public engagement to deliver better streets for all) – London Cycling Campaign & Urban Movement, July 2020
https://s3.amazonaws.com/lcc_production_bucket/files/13729/original.pdf?1596021956
- b) A Guide to Low Traffic Neighbourhoods – Living Streets & London Cycling Campaign, May 2018
<https://www.livingstreets.org.uk/media/3844/lcc021-low-traffic-neighbourhoods-detail-v9.pdf>
- c) An Introductory Guide to Low Traffic Neighbourhood Design – Sustrans
<https://www.sustrans.org.uk/for-professionals/infrastructure/an-introductory-guide-to-low-traffic-neighbourhood-design/>
- d) Active Neighbourhoods: Advice Note – Transport for Greater Manchester, Sept 2019
- e) Stakeholder Engagement in an Emergency: Lessons from Low Traffic Neighbourhoods – Local Government Association, May 2021
<https://www.local.gov.uk/publications/stakeholder-engagement-emergency-lessons-low-traffic-neighbourhoods>

80 The title of the LCC-UM document – How to Talk to People about the Future of Their Streets – is, in itself, a good summary of the approach it promotes: one that is intentional in engaging local people in scheme formulation, not one that is technocratic/top-down. Such a ‘co-design’ approach is not only likely to produce schemes that better fit the local circumstances but is also likely to increase levels of local buy-in/public consent for whatever scheme is decided upon. The document sets out the following ‘Ten Steps for Better Engagement and Consultation’:

- Step 1: Brief and purpose
- Step 2: The team
- Step 3: Data, data, data
- Step 4: Ask the residents (and businesses)
- Step 5: Create principles
- Step 6: Create scheme options
- Step 7: Engage
- Step 8: Create a final scheme
- Step 9: Build, monitor, benefits
- Step 10: Rapid mitigation and roll-out

Amongst other things, the guide includes a note about the use of trial schemes as a form of consultation, and addresses key issues such as the danger of consultation events been seen and treated as referendums, the importance of asking local people questions they’re properly equipped to answer, and the need to listen to all voices.

81 The LS-LCC Guide also emphasises the importance of genuine community engagement in the specific case of LTN proposals, and promotes the following actions under the heading ‘How to Get a Low Traffic Neighbourhood’, noting that taking these can help deliver higher levels of support and less controversy (and that these actions are useful for consultations in general).

- Do an entire area
- Start a real conversation
- Make it a genuine conversation
- Ensure communication/engagement expertise

- Build support
- Emphasise community wide benefits
- Remove all through traffic
- Be ready to handle controversy
- Consider a live trial
- Don't make it a yes or no vote
- Get data
- Stay strong and get political buy in
- Use your success to build more

82 Although the Sustrans guide is far more focused on LTN design than engagement, it nevertheless stresses the importance of making a strong, evidence-based case for their implementation. The TfGM advice note, for what it calls 'Active Neighbourhoods', adapts the action points from the LS-LCC guide while also setting out the following seven-step methodology for implementation.

- Step 1: Identification
- Step 2: Stakeholder mapping
- Step 3: Site visit and data gathering
- Step 4: Community workshop
- Step 5: Trial measures workshop and assessment of community ideas
- Step 6: Design options and concept feasibility
- Step 7: District (i.e. Borough) negotiation and completion of application (for funding)

83 The LGA report, which also reflects on LTN engagement practice during the pandemic, sets out its lessons learned under the following headings:

- It pays to invest in doing engagement well
- The whole community has valuable expertise to contribute
- Representative and/or considered views can be very valuable
- Principles first, then details
- Narratives matter
- Trials have a great deal to offer, when done properly
- An accessible and responsive council will earn trust
- Transparency remains the best policy
- Good schemes take time

E Reflections

- 84 Had the Council a greater depth of pre-existing experience in public engagement related to major policy change, together with established protocols/guidance for engagement of complex transport schemes, it would have been better able to foresee the need for, and to ensure, good engagement and communications, despite the extraordinary challenges that the pandemic imposed.
- 85 It can reasonably be concluded that the reason the Council did not have this experience or protocols/guidance was because the public engagement aspects of transport and related projects had not, in the past, always been given the necessary priority. This is reflected in the fact that many previous approaches to engagement can reasonably be described as technocratic/top-down. Comprehensive efforts to co-design schemes with the local community seem only to have occurred recently in the cases of the West Ealing Liveable Neighbourhood scheme, the development of proposals for an Ealing Town Centre Liveable Neighbourhood, and the active travel components of Let's Go Southall.
- 86 Despite having an adopted Transport Strategy that provides a very sound policy basis for necessary action, and despite the strategy referring to the need for better communication of the need for travel behaviour change, the Council does not currently have co-ordinated travel behaviour change strategy backed by pro-active communications.
- 87 However, in so far as these are failures, they cannot reasonably be simply laid at the door of the Transport and Highways teams. Just as transport is predominantly a means, not an end in itself, so the need for travel behaviour change isn't just because people need to travel differently for its own sake. The pressing need for travel behaviour change is because reducing the use of cars and other motor vehicles is vital in achieving the Council's policies in relation to climate change, air and noise pollution, public health, congestion (economic efficiency), social inclusion and just transition. Furthermore, policies on housing and transport are inextricably linked.
- 88 These priorities, and their importance, demands a joined-up, embedded, Council-wide approach to proactive public engagement and communications, of which transport is just one dimension. Meaningful public engagement, involving the active participation of local people and excellent communications concerning the Why (the need/justification/case-making) and not merely the What (the schemes/initiatives themselves, including options) must become formally integrated in practice across all Council departments. This is so that the whole – the overall outcomes in respect of the quality of life for all – will be greater than the sum of the parts – the outputs from individuals initiatives. In the context of LTNs and other active travel schemes, public engagement and communications practice should be undertaken according to adopted guidance.
- 89 Guided by established principles, public engagement and communications activity on transport initiatives must be appropriate to the initiatives in question. It can, for example, be appropriate to use simple yes/no 'referendum style' techniques on matters, such as parking controls, when what is at stake is the question of whether or not people want to pay a modest fee in order to find it more convenient to park near where they live. However, when what is at stake is the achievement of key corporate priorities, supported by robust evidence, the character of related engagement and communications needs to focus on the matters of How, not If.
- 90 That said, even in the case of the most urgent corporate priorities, such as measures to address the climate emergency, it is clear that building public support is vital. This isn't simply in order to create a supportive environment for the implementation of Council initiatives. It's because engaging people in the need for change can prompt and enable them to choose to change their own behaviour, towards the same ends, in contexts where the Council's ability to influence is minimal or non-existent. For example, LTNs themselves can lead to people walking or cycling short journeys instead of going by car; but an effective engagement programme concerning the benefits of LTNs can also mean people

make a number of other changes to their lifestyles that reduce their carbon footprint, enhance road safety, support local businesses, etc.

- 91 The potential for good public engagement to add value in this way places further emphasis on the need for the Council to take a proactive lead, and to commit the necessary resources to an engagement and communications and strategy that ‘sells’ the initiatives in question, rather than merely offering them.
- 92 The objective importance of some of the Council’s policy objectives – about which it is far from neutral – should rule against approaches to scheme delivery that do not take every reasonable step to ensure that these objectives are achieved. While such proactivity is an undoubted challenge to conventional local authority practice, it is justified by the issues at stake. “We’ve declared a climate emergency: should we sit on our hands or not?” is plainly not a question that the Council should (or will) ask. But the notion brings into focus the extent to which local people should be given control over change in their neighbourhoods, as opposed to being given genuine opportunities to participate in, and shape, the change in their neighbourhood that is needed to achieve vital societal goals.
- 93 The time and resource costs (staff and money) that are required for meaningful engagement are often cited as justifications for not undertaking such engagement. However, as Ealing’s recent experience has shown, failures in respect of public engagement commonly lead to additional costs – not just in time and resources, but also to reputation.
- 94 In closing this section, and in the light of the guidance described in section D, it is fair to say that the ways in which the Council has engaged (and failed to engage) with local people over the implementation and the future of Ealing’s LTNs has been far from best practice.
- 95 It needs to be re-emphasised that the pandemic plunged members and officers alike into entirely uncharted territory, and that there became an urgent need to do more with less over a very short timescale without the ability to engage with local people in the usual ways. Nevertheless, it was a mistake to present and conduct the introduction of the LTNs as more or less a *fait accompli* – to say to people, in effect, “Trust us, this needs to be done, and it’s both for your good and the greater good”. Despite the circumstances of the first few months of the pandemic, there was time to do a much better job of communicating the need for the LTNs and of seeking feedback on the principles prior to going public with the specifics.
- 96 Despite, indeed because of, the fact that the Council had lost control of the public narrative around LTNs in mid-June 2020, it could and should have rapidly turned its attention to addressing the public engagement deficit once the LTNs had been implemented. However, while it was a positive step to launch the Commonplace platform in October, this did not enable the Council to be any more clear than it had been as to the extent to which the responses provided were representative of the public at large. Additionally, apart from the publication of a single leaflet in November, the Council remained silent on an issue that its adopted policies (and indeed the administration’s 2018 manifesto commitment) suggest it should have been proactive about, not passive.
- 97 Subsequently, in March 2021, the Council prepared plans to undertake surveys of public opinion and convene focus groups, but these were paused. When a public consultation exercise was launched in July 2021, this was in the form of a Survey Monkey questionnaire which, while intended to bring clarity, also raised some new questions. For example, perceived by many as a CPZ-style ‘referendum’ on the LTNs, it is unclear why the views of people from outside the LTNs were sought if only those of people living within the LTNs have been given appreciable weight. (If ‘All Responses’ are considered, opposition is far greater than support in every instance – see C73.) Other concerns relate to technical aspects of the consultation, such as that respondents were not required to give their name and that it was therefore possible for one person to submit multiple responses for each LTN. This may or may not have happened, but the fact that it could bring the credibility of the process into question.

- 98 A week after the consultation closed, the government published new statutory guidance which stated that:

Consultation and community engagement should always be undertaken whenever authorities propose to remove, modify or reduce existing schemes and whenever they propose to introduce new ones. Engagement, especially on schemes where there is public controversy, should use objective methods, such as professional polling to British Polling Council standards, to establish a truly representative picture of local views and to ensure that minority views do not dominate the discourse. Consultations are not referendums, however. Polling results should be one part of the suite of robust, empirical evidence on which decisions are made.

Notwithstanding that there might be a political dimension to this guidance, it is nevertheless broadly consistent with that set out in section E.

F Recommendations

- 99 The over-arching recommendation arising from this review is that **a pro-active public engagement and communications strategy on transport initiatives should be established. This should be fully integrated within a Council-wide approach to enabling citizens and businesses to participate in shaping policy and the actions arising.** This is especially important in the case of key areas of policy – such as climate change – that necessitate a genuinely joined-up approach across all Council departments.
- 100 To achieve this outcome will require **strong, clear and consistent leadership at both member and officer levels** to ensure that many and diverse actions are directed towards the same ends and to embed the importance of co-design within corporate practice. It is understood that a review of the Council's culture and actions in relation to public engagement is currently underway and the findings in this report should be used to help inform that process.
- 101 **Appropriate training and development, both for officers and members,** should be part of this wider initiative, to ensure that their capacity to engage effectively is built and maintained. This should include learning from the experience of other local authorities in specific areas (e.g. LTNs and other active travel schemes).
- 102 **Excellent working relationships between all technical officers and their colleagues in Communications are a necessity** for achieving open and informative communications as part of scheme design and delivery, going forward. This may involve additional Comms officers with specific responsibilities for technical areas so that experience can be more easily shared and the capacity of all built over time. One of the clearest messages from this review of recent experience is that people need (and deserve) to receive clear messages – to be able to understand the narrative – about what is being proposed and why.
- 103 **The preparation of an engagement and communications plan should be a priority early task in the development of any transport/ highways scheme.** Milestones for initial and ongoing messaging/updates should be integral parts of the overall project programme.
- 104 **Effective engagement and communications should be based on stakeholder mapping** adapted for each scheme/exercise. This should ensure that all relevant and properly constituted groups are engaged but also that seldom-heard voices are actively sought out. This will, in turn, require that the tools of communication used, and the places and times where people are able to engage (real or virtual), reflect the needs of the communities in questions. Broadly-based, project-specific focus groups should be considered.
- 105 **The tools of engagement and communication used should enable the Council to be clear about the extent to which the views expressed are representative of the community at large.** Such tools include representative surveys of public opinion and context-appropriate focus groups.
- 106 **There should be consistent corporate messaging of the pressing need for change in travel habits,** so that the association of personal action with beneficial outcomes is increasingly clear. As things stand, it is – for example – more than possible for people who consider themselves concerned about climate change or traffic pollution to have failed to join the dots between the general goals they aspire to and the specific response required from them.
- 107 It is understood that the Council is contemplating engaging with the people of Ealing concerning a Charter for Active Travel (working title). As part of this process, **a Citizens Panel for Active Travel in Ealing should be considered.**
- 108 **Co-design – proactively working with local people in scheme development – should replace the technocratic/top-down approach** that has tended to characterise public engagement on transport initiatives in recent years. In this regard, the Council (officers and members) should resist presenting

itself as infallible or as a know-it-all. While professional judgement and expertise is very much still to be valued, the views and knowledge of local people should not be undervalued. The Council Leader is on record as recognising the importance of being honest about what works and what doesn't, and this is entirely consistent with the more open and inclusive approach to scheme design, implementation and monitoring that is required.

- 109 In accordance with the above, **appropriate budgetary provision for engagement and communications, and the necessary allowance of time, should be understood as fundamental components of transport schemes** – their development, implementation and monitoring.
- 110 **A clear monitoring strategy should be established from the outset.** The purpose of any given transport scheme is to achieve specified objectives (outputs and outcomes) that will have been part of the case for investment and will have influenced scheme design. It is therefore very important to know to what extent the objectives have been met, for the purposes both of feeding back to the public about the success (or otherwise) of the scheme in question and of guiding future investment and communications. It follows that, if at all possible, there must be robust prior data collection as a basis for subsequent comparison. Timescales for monitoring should be established from the outset, and clearly communicated, and these should be appropriate to the amount of time over which it might reasonably be expected to observe material change arising from the scheme in question.
- 111 **Undertaking an Equalities Impact/Analysis Assessment is an essential task within the co-design process.**
- 112 **A review of the Council's 2019 Transport Strategy should be undertaken in the light of recent experience,** with the revised version incorporating a stronger focus on public engagement and communications. This, in turn, should reflect the outcomes of Council-wide initiatives currently underway (see F100 and F106).
- 113 This stronger focus on public engagement within **the updated Transport Strategy should include a clear statement of standard public engagement principles that officers will follow for all schemes.** The process adopted by Ealing should be determined on the basis of a review of best practice (see section D) and consideration of specific aspects of local experience. As a reminder, the ten-step process recommended by 'How to Talk to People about the Future of Their Streets' (D80) is:
- Step 1: Brief and purpose
 - Step 2: The team
 - Step 3: Data, data, data
 - Step 4: Ask the residents (and businesses)
 - Step 5: Create principles
 - Step 6: Create scheme options
 - Step 7: Engage
 - Step 8: Create a final scheme
 - Step 9: Build, monitor, benefits
 - Step 10: Rapid mitigation and roll-out