London Borough of Southwark (LBS) <u>Dulwich Streetspace Review</u>

Technical Evaluation - June 2021

Prepared for:

The Dulwich Alliance

by:

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1. Introduction

In 2019 and 2020 the London Borough of Southwark (LBS) commenced a multi-phase consultation into the use of roads and traffic in the Dulwich area.

With the advent of the Covid-19 pandemic in Spring 2020, LBS introduced a number of Experimental Traffic Orders (ETMOs) to support social distancing and to reflect the need to promote cycling and pedestrian safety. The results of the first three consultation phases were used to support the introduction of these measures.

A further and final stage of consultation is now underway (Dulwich Streetspace Review) with a deadline (online) of 11th July 2021.

The Dulwich Alliance (an area-wide alliance of local residents' associations, business organisations, health centres, care service providers, societies and organisations) has formally complained to LBS about the methodology used for the consultation review. I have been asked to provide a technical evaluation of all aspects of this methodology. I do so with the benefit of more than 50 years' experience in market and social research – further information on my credentials is provided in an appendix to this report.

2. The scope of a consultation exercise

In this section I suggest the essential characteristics and inclusions of a consultation concerned with changes or potential changes in the use of streets and traffic routes. The term 'traffic' covers all forms of movement by those affected, including, but not limited to, walking, cycling, the use of private vehicles and of public transport.

<u>First</u>, it is of course essential to specify the relevant <u>'universe'</u> of individuals, or households and/or businesses and/or schools likely to be affected. This process may identify more than one such universe – for example residents in the core area and fringe residents, which need to be separated both for contact and the analysis of results. In case of individuals a minimum age definition will be required.

Having established this, the <u>second</u> requirement is to use all possible efforts to achieve a valid <u>representation</u> of the universe(s). This will normally be achieved by selecting a sample, for instance from the electoral roll, or from the PAF (Postal Address File). Only with a properly constructed systematic sample can any degree of confidence be placed in the survey findings. There must also be effort to maximise the response rate (meaning the proportion of eligible participants who provide usable responses), overall and between different universes or universe segments.

The <u>third</u> issue concerns the <u>behavioural information</u> to be collected. My view is that this should be a combination of <u>'hard'</u> and <u>'soft'</u> data. The 'hardest' information is likely to be quantitative traffic count data. This is out of scope of this evaluation, but I would expect this to be provided to assess the impact of any experimental changes on traffic flows, and of course, pollution levels, <u>both</u> on the roads which are the subject of the schemes <u>and</u> other adjacent routes which may have an increased vehicle load. Such data cannot of course be attached to individuals and this is where survey information becomes vital, starting with claimed behaviour, in as much detail as possible. A 'pre-post' design is optimal; if this is not possible we must rely on questioning to establish the claimed or perceived extent of any changes and their impact on participants. This is 'softer' but the ability to associate it with sub-groups within the universe is invaluable.

We now move on to the <u>fourth</u> area - <u>qualitative data</u> which will necessarily be 'softer'. This may include questions on general attitudes about the topic under consultation as well as opinions on specific proposals. There are a variety of issues affecting how questions of this type should be developed and presented, and the aim should be to ensure that they are:

- * unambiguous
- * objective
- * relevant
- * in 'consumer language'

The choice of responses should also be carefully considered, especially where qualitative scales are used – of 'agreement', or of 'satisfaction', for instance. In some cases, it may be necessary to establish the importance of an issue to a participant, as well as her/his attitude towards it.

The <u>fifth</u> area consideration concerns what is normally termed <u>classification</u> information. Typically, this will include gender, age, an indicator of socio-economic status, but additional variables will often be added to reflect the issue under investigation. An example in this case might be availability and frequency of use of various private transport modes, for example: e-bike/scooter, bicycle, motor cycle, car/van. It is also important to limit this section to essential questions, both with regard to questionnaire 'load' and sensitivity.

Before moving to examine each of the six issues I will briefly summarise my understanding of the Dulwich Streetspace Review methodology.

3. Summary of the LBS consultation methodology

This evaluation is divided into sections which correspond with the LBS document 'Dulwich Streetspace Review – Engaging with the public' states that:

'The primary tool for public engagement will be a consultation form that will be available online at www.southwark.gov.uk/dulwichstreetspacereview - we are encouraging everyone who has an interest in the subject to complete the form, as this will give us the clearest possible understanding of the views and needs of the whole community.'

The consultation form referred to is the survey questionnaire. This, it will be noted, can be completed by anyone visiting the specified section of the LBS website. People who completed the Review registration form have been notified of the start of the consultation, and a paper version of the questionnaire has been delivered or is available to anyone on request.

The document identifies a very wide range of individuals and organisations that LBS is 'particularly keen to hear from' including residents of different categories, businesses and organisations and staff, parents and children of local schools. There are 11 such groups in all.

I note that there have been/will be engagement meetings held on-line as well as face-to-face (I believe) meetings for 'key stakeholders, businesses and schools and young people'. It is not clear if 'young people' means schoolchildren or young adults.

The consultation form (questionnaire) is comprised of the following sections:

- * About You
 - Name/email/ response capacity/postcode/street
- * Overview
 - Introduction/purpose of road schemes/consultation purpose/online meetings
- * General Questions
 - Attitudes to road schemes (11)/changes in travel mode(5+4)/reducing car use (8) A majority use five point scales
- * People with protected characteristics
 - Questions relating to disabilities/age/questions relating to older people
- * Businesses and the Community
 - Change in usage of local businesses mainly five point scales
- * Road changes section by section
 - For each of the seven schemes:
 - Success of the measure (6)/preference remove, retain, other (open)
 - The 'success' questions use five point scales.

(cont.)

* Equalities questions (optional)
Ethnicity/sex-gender-orientation/religion/pregnancy/household income/
employment status/education/home tenure/invitation to join mailing lists

4. Evaluation

This section is divided into sub-sections which correspond to the five characteristics and requirements I suggested in section 2, as components of a consultation process of the kind under examination.

4.1 Definition of stakeholder universe(s)

LBS uses the term 'stakeholder' in places and it is a convenient umbrella term for the various groups who may or will be affected by, and interested in the Streetspace schemes.

The 11 groups of such stakeholders identified by LBS and referred to in the previous section, cover every conceivable group (with some inevitable duplication) and no attempt is made in any LBS documentation I have seen to suggest what importance may be given to answers from the various groups. (Possibly the Council has working documents which address this point).

In any event, it is clear that there has been no attempt to structure the consultation so as to be able define the various stakeholder groups, or to establish the importance of each of these groups.

This takes us on to the second issue.

4.2 Representation of the universe(s)

Whilst, as shown in the previous section, the Council is keen for all to complete the form/questionnaire, the Streetspace review methodology is essentially 'pull': i.e. any would-be participant has to take action in order to obtain the form/questionnaire. To be of real value consultation methodology has to be 'pushed', requiring:

- a defined universe or series of universes (residents, business establishments etc.)
- a systematic sampling procedure for each universe
- an appropriate contact methodology
- measures to encourage response follow up, incentives etc.
- data to allow correction of any skews within the achieved sample

There are various methods which might be possible – face to face interviewing, telephone (though difficult for residents). There might be email databases for some groups; and a 'push to web' approach – a mailing to residents/households etc., directing them to an online consultation questionnaire, which appears to have

applied to some households but not all groups.

The LBS Streetspace Consultation has:

- * no control over who completes the questionnaire, or if the person who completes it is who they say they are
- * no way to validate their claimed capacity for completing it
- * no process for encouraging and maximising the response rate

It is very likely that the results will be distorted by differential response rates, for instance by geography. I note that in Phase 2 there were a disproportionate number of completed forms from Calton Avenue residents with regard to the Dulwich Village Traffic Filter. This is not surprising given the topic. It is not for me to suggest what weight those responses should be given. There are just under 70 households in Calton Avenue. If we allow for 2.5 adults aged 18+ per household (above the national average) that gives a total of 170 electors, which is about 0.2% of the Village Ward electorate.

Children are included in the groups to be consulted, presumably through the face-to-face school meetings mentioned in the Engagement document. The specific method/structure of this consultation is not stated. The UK research industry has a Code of Conduct maintained by the Market Research Society. Under this code, children aged 15 or under must not provide personal information without the agreement of a 'responsible adult'. A teacher <u>may qualify</u> as such a person in some circumstances, but in view of the topic I wonder if this would be one of those.

The review methodology makes no serious attempt at systematic contact with would-be participants in the various stakeholder groups, or to maximise response rates or to ensure that different groups with a universe are adequately represented.

4.3 Behavioural information

I have seen references to traffic counts in LBS documents and I assume they have been analysed and published, including any effect on traffic flows and pollution levels on streets/routes likely to be used by the traffic displaced by the various closure schemes.

A significant weakness of the review questionnaire is that <u>it does not include any</u> <u>meaningful</u> <u>questions on people's behaviour or the effects of the closures on such behaviour.</u>

Question 3 of the 'General Questions' section asks:

(see over)

To what extent have you or your household changed the way you travel particularly for local journeys, including taking children to school – compared with how you travelled in 2019 or earlier?

Participants are asked to say whether 'I/we' use/travel by: car; walking; cycle/scoot; public transport; taxi/car share etc. using a 5 point scale – 'much more' to 'much less' + n/a

These are <u>not</u> meaningful behavioural questions. Moreover 'local' is not defined and it is left to the participant to decide if the response is individual or for the household. The two year recall period is far too long to be likely to provide accurate responses; those trying to respond are likely to assume that some change is expected of them since this time-frame fits the dates of the road changes made or proposed by Southwark.

4.4 Qualitative information

As the summary of the review methodology (see section 2 above) shows, the overwhelming bulk of questionnaire involves questions on attitudes and opinions, mainly in the form of five-point scales covering the extent of 'agreement', 'success' etc.

Prior to the General Questions section the Overview describes the objective of the schemes – with a list of 10 intended benefits. No mention is made of any 'trade-offs' which may have to be made if the schemes are accepted/made permanent.

Question 1 asks participants how much they agree with 11 statements. All 11 are presented in the 'positive', and many of them contain two separate 'issues' – for example:

Improving air quality and road safety on my street or road is very important

Given the Council's introduction participants are likely to find it difficult to disagree; and their responses will be deemed to cover both pollution and road safety which have been bundled together.

Some of the questions are incredibly difficult to answer with any degree of confidence, for example:

The trial measures are helping the Council to tackle the Climate Emergency and reduce air pollution by 2030

I believe that most people will have insufficient information available on the projected effectiveness of the schemes to provide a rational answer, so given that

tackling the emergency is the right thing to do, will tend to give LBS the benefit of the doubt and agree.

Question 5 says that:

Southwark Council aims to reduce the number of journeys made by motor vehicles, particularly petrol and diesel vehicles. What measures would help you use a car less often? What would you like to see more of?

The measures presented are heavily weighted towards bikes/cycling and again some contain multiple ideas or suggestions, for instance:

More streets prioritised for walking and cycling with planters and benches

'Prioritised' is not consumer language. Do I respond for walking or cycling? What is the purpose of the benches compared with that of the planters?

In the 'People with Protected characteristics section', the questions on respondent disability and age are followed by a series of related questions with the inevitable five-point scales.

It appears that <u>all</u> participants should answer these and express views on for example:

How have the road changes affected older people?

- It has made me feel more connected to my friends and neighbours and
- Made it easier to get around by bike or scooter/mobility scooter

The former is both leading and essentially meaningless. Depending on the Council's unstated definition of 'older people' it seems unlikely that the latter question will be relevant to many!

There are various other examples of poor question routeing and poor question/scale design. But the fundamental problem with these questions is that it is very difficult to disagree with any of them given LBS's stated objectives, and the way they are presented. There is no attempt to provide 'balance' either in the introductory section or in the range and structuring of the statements. Most or perhaps all of them, will seem to be beneficial, in the abstract.

Of course life isn't like that. Almost all actions, however worthy, involve trade-offs and the Review makes absolutely no attempt to identify these or to assess the balance of opinions on this basis.

Participants are presented with a range of questions and scales which given the Council's stated aims are almost impossible to disagree with.

A section of the Review is concerned specifically with attitudes to the seven road changes. Participants can choose which schemes if any they will respond to. A five-point 'success' scales is used for participants to respond on the following issues:

- safe routes for walking & cycling
- reducing traffic volumes
- improving the public realm (my italics)
- safer environment for children
- good trading environment
- healthier streets

The points I have made above again apply – it is difficult to disagree with them as they are presented. They are in the main, too wordy, overlap and will, in my view, not encourage serious responses. 'Public realm' may be a relevant terminology for a local authority but I believe it will mean little or nothing to most participants.

A final question, for each of the schemes, asks:

Overall what would your preference be for the future of this measure?

a return it to its original state

b retain it as it is

c install a different kind of measure

d retain the measure but modify/enhance it with other features

Those responding c or d, are asked to explain what they would like.

This question is clearly of central importance, and its design and construction is not satisfactory. Those responding are faced with three options for retention against a single one for removal. The first objective should be to establish whether a participant would like traffic restrictions to continue. So for instance:

a return it to its original stateb retain it as it is or with some modifications

Then – if a respondent answers **b**:

x would you like to retain it as it is, or

y keep it but with some changes, please choose from the list below or write in your own suggestion

The options for **y** would vary between the schemes and LBS should make every effort to specify those which are possible. It is very difficult for people to respond to an open question as in **c** and **d**, and also extremely difficult to code and summarise such responses.

<u>The Review's approach falls far short of what should be expected of a serious attempt to establish stakeholders' views.</u>

4.5 Classification information

There is not much to say on this. The form collects a wide range of classification data – the most relevant of which are likely to be <u>participant street/postcode</u> and <u>reason/capacity for responding</u>. The 'Equalities questions' section collects a wide range of classification data:

- sex
- ethnicity
- gender at birth
- sexual orientation
- religion
- pregnancy/maternity leave
- household income
- employment status
- education level
- housing tenure

(Age and Disability were collected in a separate section of the questionnaire).

Despite reference to 'children' at points in the questionnaire/form, <u>no information</u> on presence of children in the household has been asked for.

It is not clear to me why much of this information has been collected. Whilst the Council may wish to demonstrate that they have sought information from all sections of the community, including 'at risk' groups, the survey design does not provide a basis for demonstrating this. People responding to the Review are essentially self-selecting – they do not constitute a representative sample of any universe.

5. Conclusions

This report is not concerned with the merits or otherwise of the road changes the London Borough of Southwark has made in Dulwich. Nor does it seek to address whether these changes should be subject to consultation.

It is focussed solely on whether the consultation methodology associated with the Dulwich Streetspace Review will provide an objective and meaningful picture of stakeholders' views.

My assessment is that both the overall methodology, and the 'form' (questionnaire) itself, fall far short of the standard which should be expected from a serious public consultation exercise on issues which impact on the lives of residents and businesses. In my view the Council will not be able to draw any valid conclusions from it.

The overall approach does not:

- * define the relevant universe(s) to be included
- * use a systematic methodology for contacting any groups in which there is interest
- * have any mechanism for validating the sources of response
- * include any systematic provision for encouraging participation

Whilst we do not yet know how many responses will be forthcoming, it is almost inconceivable that anything like a representative sample of the residential universe will be achieved.

The questionnaire itself is poorly designed, with phrasing which is frequently vague or difficult to interpret.

Specifically it does not to attempt <u>any meaningful behavioural information</u> – how people travel for various purposes and what effect the measures have had on this.

Instead it relies on a large battery of <u>attitudinal questions and scales</u>. These are almost uniformly expressed in 'positive' mode leading to a likely skew in responses towards agreeing with the Council's objectives. I point out a few of these in section 4.4. Separate issues are sometimes bundled together in a single question making it very difficult to answer. Some of the terminology is more suited to local authority committees than residents.

There is no attempt to ask participants to evaluate 'trade-offs' (e.g. between reduced pollution and increased journey times). Having read the Council's introduction which describes the objectives and the action taken, in my view it will

be difficult if not impossible for participants to disagree with many of the questions. They are wordy and leading and, like 'motherhood and apple pie', to be disagreed with at your peril.

The question-set on the specific schemes is also unbalanced – participants are offered three 'retain' options, against just one for a return to the former arrangement. I have suggested how those questions <u>should</u> be asked.

As I have set out above, it is clear that the Review will fail to provide a fair and proper analysis on the acceptability of the Streetspace schemes to those affected by them. Given this it is reasonable to continue to press for the Review to be withdrawn or fundamentally modified.

Such modification would in essence take the form of a high-quality sample survey, as a precursor to which there would need to be agreement on the various universes to be included in it. A balanced set of behavioural and attitudinal questions would be included, and there would be appropriate 'routeing' to ensure that participants are only asked to respond to questions relevant to them. There are professional market and social research organisations who could design and undertake such work.

Appendix 1: Roger Gane's experience and qualifications

I have worked in the market research industry for more than half a century. From the 1960s to the early '90s I worked for a number of research companies and large client organisations.

In 1992 I was appointed managing director of RAJAR (Radio Joint Audience Research). There, I oversaw the launch of the radio audience measurement service for the BBC and commercial radio trade association (currently known as RadioCentre). In my 5 years at RAJAR I played a major role in its establishing it as the 'currency' for the radio market.

In 1997 I joined Ipsos UK (now part of Ipsos MORI). As joint MD of the company I was responsible for the company's wide range of market, public sector and media projects and services. Later I took specific charge of Ipsos's media division – where I had both business and research accountability for major contracts and services conducted on behalf of the broadcast and print media industries.

Then in 2004 I joined RSMB as Research Director; this is a relatively small company specialising in high-level research, statistical consultancy and quality control for major media companies.

Since retiring from full-time employment in 2011, I have run a consultancy focussing principally on technical 'auditing' of audience measurement services. This has allowed me to continue my interest in dealing with the challenges of accurate data collection and analysis; in addition to UK consultancy projects, I have also undertaken work in Hong Kong, Ireland, Turkey and South Africa.