

# LONDON BOROUGH OF CROYDON

<b>REPORT:</b>	<b>CABINET</b>	
<b>DATE OF DECISION</b>	<b>15<sup>th</sup> July 2024</b>	
<b>REPORT TITLE:</b>	<b>Report on nine Experimental Traffic Management Orders to support Healthy School Streets Schemes (Group 3)</b>	
<b>CORPORATE DIRECTOR / DIRECTOR:</b>	<b>Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration &amp; Economic Recovery</b>	
<b>LEAD OFFICER:</b>	<b>Jayne Rusbatch, Head of Highways &amp; Transport</b>	
<b>LEAD MEMBER:</b>	<b>Councillor Scott Roche, Cabinet Member for Streets &amp; Environment</b>	
<b>KEY DECISION?</b>	<b>Yes</b>	Key Decision reference: 0324SAE  REASON: Decision significantly impacts on communities living or working in an area comprising two or more Wards
<b>CONTAINS EXEMPT INFORMATION?</b>	<b>No</b>	<b>N/A</b>
<b>WARDS AFFECTED:</b>	<b>MULTIPLE (Kenley, New Addington North, Norbury Park, Park Hill &amp; Whitgift, Selhurst, Shirley North, South Norwood, Waddon, West Thornton)</b>	

## 1. SUMMARY OF REPORT

- 1.1 This report provides the Executive Mayor of Croydon and Cabinet with recommendations for the future of the nine Experimental Traffic Orders (ETOs) covering nine Healthy School Streets (Group 3) that were implemented on 23 January 2023, for a period of 18 months which included a 6-month statutory objection period, from 23 January 2023 to 23 July 2023.
- 1.2 During the first 6 months of the current experimental orders, the Council sought the views of the local community via statutory consultation and encouraged them to provide feedback through the Get Involved online survey. Monitoring the impact of the proposals was integral to the process during the experiment, and the Council carried out traffic surveys and air quality monitoring in the school streets and neighbouring streets to assess the traffic impact.

1.3 The table below lists the nine Healthy School Street schemes that form Group 3:

Ref	School	Affected Road(s)	Ward
HSS1	The Crescent Primary School and The BRIT School	The Crescent and Saracen Close	Selhurst
HSS3	South Norwood Primary School	Birchanger Road, Crowther Road and Gresham Road	South Norwood
HSS4	St Cyprians Greek Orthodox Primary School	Ingram Road and Springfield Road	Norbury Park
HSS5	Howard Primary School	Dering Place and Barham Road	Waddon
HSS6	Oasis Shirley Park	Stroud Green Way and Swinburne Crescent	Shirley North
HSS7	Good Shepherd Catholic School	Dunley Drive and Walker Close	New Addington North
HSS8	Kenley Primary School	Mosslea Road and New Barn Lane	Kenley
HSS9	Gonville Academy	Gonville Road	West Thornton
HSS10	Park Hill Junior & Infants School	Stanhope Road, The Avenue, Cotelands, Crusader Gardens and Pageant Walk	Park Hill & Whitgift

1.4 This report together with the supporting appendices presents the outcome of the engagement and statutory consultation for the nine experimental orders in the Healthy School Streets scheme areas.

## 2. RECOMMENDATIONS

For the reasons set out in the report and its appendices, and having due regard to the outcome of the consultation, the equalities considerations as set out in section 10.3 and the section 122 Road Traffic Act 1984 considerations as set out in section 5, Cabinet is recommended to agree:

2.1 To make the following eight experimental traffic orders, which form the healthy school streets schemes detailed within this report, permanent:

School	Affected road(s)	Section	ETMO Cited As	Ref
Howard Primary School	a. Dering Place; b. Barham Road	a. Entire length b. Entire length	The Croydon (Traffic Movement) (No.1) Experimental Order 2023	HOWARDSS/2023
South Norwood Primary School	a. Birchanger Road; b. Crowther Road; c. Gresham Road	a. Between Carmichael Road and Merton Road b. Between Balfour Road and Stanger Road c. Entire length	The Croydon (Traffic Movement) (No.2) Experimental Order 2023	SOUTHNORWOODSS/2023
Gonville Academy	Gonville Road	Between Limpsfield Avenue and Gonville Academy	The Croydon (Traffic Movement) (No.3) Experimental Order 2023	GONVILLESS/2023
The Crescent Primary School and The BRIT School	a. The Crescent b. Saracen Close	a. Entire length b. Entire length	The Croydon (Traffic Movement) (No.4) Experimental Order 2023	CRESCENTSS/2023
St Cyprians Greek Orthodox Primary School	a. Ingram Road b. Springfield Road	a. Between Carolina Road and Springfield Road b. Between Carolina Road and Springfield Road	The Croydon (Traffic Movement) (No.5) Experimental Order 2023	CYPRIANSS/2023
Good Shepherd Catholic School	a. Dunley Drive b. Walker Close	a. Between Leigh Crescent and Chesney Crescent b. Entire length	The Croydon (Traffic Movement) (No.6) Experimental Order 2023	GOODSHSS/2023
Kenley Primary School	a. New Barn Lane b. Mosslea Road	a. Between Beverley Road and the railway line b. Between New Barn Lane and Hillcrest Road	The Croydon (Traffic Movement) (No.8) Experimental Order 2023	KENLEYSS/2023
Oasis Shirley Park	a. Stroud Green Way b. Swinburne Crescent	a. Between north-eastern boundary of Oasis Academy, Shirley Park and Coleridge Road b. Entire length	The Croydon (Traffic Movement) (No.9) Experimental Order 2023	SHIRLEYPARKS/2023

2.2 To withdraw The Croydon (Traffic Movement) (No.7) Experimental Order 2023 effective as of 23 July 2024 in respect of the Park Hill Junior & Infant School Street in Stanhope Road, The Avenue, Cotelands, Crusader Gardens and Pageant Walk, and not to proceed to make it permanent; and to authorise the Corporate Director of Sustainable Communities, Regeneration and Economic Recovery to take steps necessary to publicise this withdrawal and remove any associated signage and other measures in place as a result of the experimental order.

2.3 Subject to approval of recommendation 2.1 above, to delegate authority to the Corporate Director of Sustainable Communities, Regeneration and Economic Recovery to undertake all measures necessary to make the eight experimental orders permanent Traffic Management Orders, including pursuant to the statutory requirements of the Road Traffic Management Act 1984 and Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 and make arrangements for the enforcement thereof.

### **3. REASONS FOR RECOMMENDATIONS**

- 3.1 For the reasons set out below and detailed within this report and supporting appendices, officers conclude that eight of the nine Healthy School Street Experimental Traffic Orders are implemented permanently and one is withdrawn.
- 3.2 The eight schemes recommended to be made permanent meet and support several of Croydon's strategic transport objectives as per the Local Implementation Plan, along with those within the Executive Mayor of Croydon's Business Plan and lastly the Mayor of London Transport Strategy.

### **4. BACKGROUND**

- 4.1 Croydon intends to ensure that the borough has a cleaner, sustainable recovery from the pandemic, encouraging healthier travel helping us to deliver the Executive Mayor of Croydon Business Plan and The Mayor of London Transport Strategy at a local level. This is aimed at addressing the challenges and opportunities coming from the pandemic around climate change, congestion, road safety issues and poor air quality.
- 4.2 The Third Local Implementation Plan (LIP3) reflects local plans and The London Mayor's strategy, including that all local Councils must help children and parents to use cars less and to walk, cycle and use public transport more.
- 4.3 Croydon's new draft Air Quality Action Plan, approved for consultation in the May 2024 Cabinet, states that air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas. The annual health costs to society of the impacts of air pollution in the UK is estimated to be roughly £15 billion. Croydon is committed to reducing the exposure of people in Croydon to poor air quality in order to improve health.
- 4.4 The Director of Public Health's Annual Report 2022 for Croydon recommends Being Active as one of the five ways to wellbeing, and measures to increase the levels of physical activity, such as school streets, would support childhood development between the ages of 6 – 11.
- 4.5 Healthy School Street Programmes are a direct result of central government enacting national policies to increase active travel through walking and cycling, in turn capturing the health benefits attributed to these sustainable modes. National policies have been adopted by regional government and local government to create a sea of change in reducing non-essential motorised travel through towns and cities. These are also linked to other policy drivers to curb the level of pollutants and to decrease the level of child obesity.
- 4.6 The roads outside of our schools are often congested with traffic, affecting air quality and road safety. The latest Department for Transport data looking at road collisions in 2023, show that Croydon has the biggest increase in road casualties across London in the last decade, and the highest increase in the capital in the last year, which is the opposite to the general trend seen across the country. In 2023, there were 1,258 road casualties in Croydon, a 15% rise compared to the previous year. Croydon also has the highest number

of recorded casualties for child pedestrians in London. Implementing Healthy School Streets across the borough would contribute to increasing road safety and reduce road casualties.

- 4.7 Healthy School Streets are not an isolated device. It supports the educational and information efforts of the Council’s Road Safety and School Travel Planners, including their coordination with the TfL Explorers (Primary Schools) and TfL Pioneers (Secondary Schools) and Living Street’s WoW Travel Tracker initiatives. TfL Explorers and Pioneers aims to inspire young Londoners to travel to school sustainably, actively, responsibly, and safely by championing walking, scooting and cycling. Living Streets is a charity that inspires the nation to walk more. WOW is a pupil-led initiative where children self-report how they get to school every day using the interactive WOW Travel Tracker.
- 4.8 For further information on the policy objectives and the evidence in support for implementation of Healthy School Streets please refer to sections 2 – 3 of the Schools Streets Traffic Management Advisory Committee Report (TMAC) dated May 2019, which can be found [here](#).

### Results of the informal consultation undertaken in 2022

- 4.9 To inform the rollout of the ongoing school street programme, an informal consultation exercise was undertaken in 2022, which is set out below. The consultation included 11 schools, of which nine were taken forward to implementation under an Experimental Traffic Order.
- a) 6,342 leaflets were posted to addresses in a defined consultation area (250m from the school street) for the nine schools as detailed in this report between 1 July 2022 and 30 July 2022.
  - b) 444 responses were received from within the consultation area. This represents a response rate of 7%, this is less than the average response rate of 10% expected for similar consultations.
  - c) The Council received 292 responses from those beyond consultation area including properties that would not have received a Council issued leaflet.
  - d) The total responses combined from both within and outside the consultation area was 736.
  - e) Across all nine HSS schemes detailed in this report, the response rate in favour from those within the consultation area was 43% (189) in support and 57% (255) not in favour. The response rate from those outside the consultation area was 42% (122) in support and 58% (170) not in favour.
- 4.10 The tables below summarise of the informal consultation outcome carried out in 2022 per scheme, for the nine school streets detailed in this report.

All 9 school proposals			Opinions		
Distance	Letters	Responses	No	Yes	Unsure
Within consultation area (250m)	6,342	444 7%	255 57%	189 43%	0 0%
Outside consultation area	-	295	170 58%	132 41%	3 1%
Total	6,342	739	425 58%	311 42%	3 0%

The Crescent Primary School			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Within consultation area (250m)	1,306	48 4%	23 48%	25 52%	0 0%	Low response rate. Respondents expressed difficulties with working parents / residents and consideration of one-way as alternative
Outside consultation area	-	55	37 67%	17 31%	1 2%	
Total	1,306	103	60 <b>58%</b>	42 <b>41%</b>	1 <b>1%</b>	

South Norwood Primary School			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Within consultation area (250m)	1,417	72 5%	56 78%	16 22%	0 0%	Low response rate. Main comments included difficulties with working parents / residents and better enforcement of existing restrictions
Outside consultation area	-	40	23 58%	17 42%	0 0%	
Total	1,417	112	79 <b>71%</b>	33 <b>29%</b>	0 <b>0%</b>	

St Cyprian Greek Orthodox Primary School			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Within consultation area (250m)	643	65 10%	46 71%	19 29%	0 0%	Main comments included congestions in side roads, pollution in side roads and difficulties with working parents / residents
Outside consultation area	-	14	8 57%	6 43%	0 0%	
Total	643	79	54 <b>68%</b>	25 <b>32%</b>	0 <b>0%</b>	

Howard Primary School			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Within consultation area (250m)	854	23 6%	14 61%	9 39%	0 0%	Respondents stated that this would cause congestion in the side roads but also that it would make it safer to travel to school
Outside consultation area	-	28	12 43%	16 57%	0 0%	
Total	854	51	26 <b>51%</b>	25 <b>49%</b>	0 <b>0%</b>	

Oasis Shirley Park			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Within consultation area (250m)	485	33 7%	18 55%	15 45%	0 0%	Respondents stated that this would cause congestion in the side roads but also that it would make it safer to travel to school
Outside consultation area	-	8	4 50%	4 50%	0 0%	
Total	485	41	22 <b>54%</b>	19 <b>46%</b>	0 <b>0%</b>	

Good Shepherd Catholic			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Within consultation area (250m)	450	28 6%	12 43%	16 57%	0 0%	Respondents stated that it would be safer to travel to school but expressed difficulties for working parents / residents
Outside consultation area	-	44	29 66%	14 32%	1 2%	
Total	450	72	41 <b>57%</b>	30 <b>42%</b>	1 <b>1%</b>	

Kenley Primary School			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Within consultation area (250m)	307	62 20%	35 56%	27 44%	0 0%	Main comments included congestion in side roads and difficulties for working parents / residents
Outside consultation area	-	25	19 76%	16 34%	0 0%	
Total	307	87	54 <b>62%</b>	33 <b>38%</b>	0 <b>0%</b>	

Gonville Academy			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Within consultation area (250m)	429	44 10%	13 30%	31 70%	0 0%	Respondents stated that it would be safer to travel to school but wanted better enforcement of existing restrictions
Outside consultation area	-	31	16 52%	15 48%	0 0%	
Total	429	75	29 <b>39%</b>	46 <b>61%</b>	0 <b>0%</b>	

Park Hill Junior & Infants School			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Within consultation area (250m)	451	69 15%	38 55%	31 45%	0 0%	Respondents stated that this would cause congestion in the side roads and wanted size of school zone to be increased
Outside consultation area	-	50	22 44%	27 54%	1 2%	
Total	451	119	60 50%	58 49%	1 1%	

## 5. DETAILS

- 5.1 The purpose of the current Experimental Orders, which are the subject of this report, was to test whether the Orders improve road safety, reduce pollution and encourage people to travel to and from school more sustainably in the nine school street scheme areas, whilst not materially negatively impacting on access to premises on the school streets. The Orders have been introduced experimentally so that the effectiveness in achieving these aims can be assessed before a decision is made as to whether to make it permanent. The Experimental Orders introduced nine separate school pedestrian zones into the roads as listed in paragraph 1.3, which prohibit any motorised vehicle (with the exception of vehicles being used for police, ambulance or fire service purposes, liveried vehicles providing a universal postal service or vehicles in the service of the local authority being used in pursuance of statutory powers or duties) entering these streets/sections of streets between 8:00am - 9.30am and between 2.00pm – 4:00pm, Monday to Friday during school term time. An exemption applies for those holding a valid permit issued by the Council for that pedestrian zone.
- 5.2 The Road Traffic Regulation Act 1984 (RTRA) and the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 (LATOPR 1996) establish the procedures for making a traffic regulation order, (including an Experimental Traffic Regulation Order).
- 5.3 Regulation 23 of the Local Authority Traffic Order which governs making an experimental order permanent, provides that the Council is able to rely on the truncated process for approval of an experimental order being made permanent provided that the requirements of Regulation 23(3) are met and the sole effect of an order ("a permanent order"), is to reproduce and continue in force indefinitely the provisions of an experimental order or of more than one such order ("a relevant experimental order"), whether or not that order has been varied or suspended under section 10(2) of the Road Traffic Regulation Act 1984.
- 5.4 The legal requirements in this regard are set out more fully in Section 10.2 below however, for these purposes, highways officers confirm that the legal requirements of regulation 23 have been met for the eight ETOs recommended to be made permanent as part of this report. Accordingly, and in light of the contents of the report and supporting appendices, the recommendation in the report is therefore to make eight Experimental Orders Permanent in compliance with Regulation 23.
- 5.5 In making the recommendations, officers have assessed the considerations which arise as a result of the Council's duties under section 122 of the Road Traffic Regulation Act 1984 ("RTRA") and officers' analysis of how and the degree to which these considerations will be met through the recommendations in this report is set out below. The Council must exercise its powers under the RTRA (including making experimental traffic orders permanent or deciding to withdraw experimental traffic orders) so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the

highway. In making decisions in this regard, the Council must have regard to:

- The desirability of securing and maintaining reasonable access to premises;
- The effect on the amenities of any locality affected and the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
- The national air quality strategy;
- The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
- Any other matters appearing to the local authority to be relevant.

5.6 For proper consideration of the above matters, the decision-maker is required to: have in mind the section 122(1) duty as set out above; then have regard to factors which may point in favour of imposing a restriction on movement of traffic and pedestrians (including all the factors in the bullet points above); and finally balance the various considerations and come to the appropriate decision.

5.7 Of particular relevance, given the aims of Healthy School Streets, are the objectives to:

- ensure safe passage for vehicles and pedestrians (road safety);
- encourage modal shift to active travel modes to improve air quality to support the Council's statutory duties in relation to the national air quality strategy; and
- secure and maintain reasonable access to premises and impact on passage of public service vehicles;

5.8 Taking in turn the statutory requirements as set out above, officers consider that the recommendations in the report support the section 122 requirements in the following respects:

- a) **Road Safety:** In general, road safety can be measured by a reduction in risk (and correspondingly in collision injuries) through measures introduced and/or reduced road danger through the reduction of traffic volume. The pedestrian zone school street restrictions at school pick up and drop off times mean that traffic is dissipated over a larger local area, and associated with this there is a reduction in road danger, as opposed to a concentration of traffic within a smaller section of road space outside of the school entrances.

The Council has carried out traffic analysis along various streets within this programme through the installation of traffic count tubes across the road to monitor two-way traffic movements and traffic speeds over a 24-hour period. Appendix B summarises these results, with the results showing a reduction of traffic volume on the school streets during the restricted times, in comparison to outside of the restricted times during the same period.

The analysis of traffic flow data in this report shows a traffic reduction for all school streets and hence a reduction in road risk.

It is expected that traffic volumes within the immediate local area to the eight school streets recommended to be made permanent, will continue to decrease over time, based on behavioural change. These behavioural changes can be difficult to quantify during an experimental period when parents may assume that measures introduced may not be made permanent especially if there is strength of feeling against specific measures. A reduction of parents dropping off their children by car in specific school



streets is not a determinant factor that behaviour has changed, it can be that parents choose to drive to neighbouring streets and walk to collect their children. Detailed research over time in collaboration with the schools is required to quantify the change in behaviour.

- b) **Reduce Pollution and national air quality strategy:** The school street pedestrian zones exclude non-permitted motorised vehicles and this could mean improvement to the air quality, due to a reduction in car borne pollutants, attributed to a reduction in the volume of traffic using a specific section of road. Caution needs to be applied to this assumption as pollution levels depend on many other factors including weather conditions, etc and are not a single source measurement over a short duration.

Air quality monitoring equipment has been installed at all school street locations, and whilst it is too early to comment fully on pollution levels indicated by recent Breathe London monitoring data analysed during October 2023 period (refer to Appendix C), an initial review demonstrates that air quality has improved following the implementation of the school streets.

- c) **Secure and maintain reasonable access to premises and facilitating passage of public service vehicles**

The school street pedestrian zone restrictions operate whilst school is in session during both the drop off period (8am to 9:30am) and pick up period (2pm to 4pm) and do not operate during school or public holidays. The Council appreciates that the restrictions may cause inconvenience and has considered the need for access to the school streets during these times. To mitigate access issues, the Council has in place a suite of permits and exemptions to provide access for various users free of charge. This includes exemptions for parents/carers of children with disabilities and builders/tradespersons visiting premises during the hours of operation. Residents are encouraged to arrange deliveries and visits outside of the operational hours. However, the Council can consider special access requests on a case-by-case basis, for example, for those with medical circumstances requiring carers during the hours of operation and/or being collected by taxis for hospital appointments. In taking decisions and bringing forward these proposals, regard should be had to the provisions of the Human Rights Act 1998 which are detailed more fully in section 10 of this report. In respect of these proposals and the proposed mitigation, highways officers do not consider that the recommended implementation of eight school streets would impede on the right of individuals to respect for private and family life either in public or on private land but that to the extent that they do, these are necessary and proportionate to achieve the aims as detailed in this report.

For some working parents that drop off their children enroute to their place of work, access to the school street itself will remain restricted. This is because safety of children who do walk and cycle to school is considered to be of a greater priority. Motorised vehicle access for parents is not permitted to minimise the number of vehicles entering/exiting the school street during busy periods, unless they are parents/carers of children with disabilities.

The are future plans for the Council to review the timings of all the Healthy School Streets across the borough to ensure that they are still effective in reducing traffic volumes and encouraging modal shift.

## 5.9 Highways officers have considered the requirements of the Regulation 9 of the Local

Authorities Traffic Orders (Procedures) (England and Wales) Regulations 1996 and are of the view that there is no statutory requirement to hold a public inquiry in light of the nature of the proposed permanent orders nor do the objections in respect of the 8 experimental orders proposed to be made permanent, indicate that such an inquiry is appropriate.

## **6. ALTERNATIVE OPTIONS CONSIDERED**

### **Option 1: not proceeding with making the eight schemes permanent.**

- 6.1 Officers are of the view that not making the eight recommended schemes permanent would be a missed opportunity to improve the quality of the environment within close proximity of schools, hence not delivering an element of the Executive Mayor of Croydon's Business Plan. The objections have all been considered and in respect of eight of the experimental schemes, it is considered that the objections are not supported by the evidence gathered by the Council and detailed within this report and supporting appendices and/or are mitigated by the measures such as the permit scheme set out above.
- 6.2 The Healthy School Street Programme is a long-term goal aimed at changing travel behaviour from motorised transport to active travel which has significant health and wellbeing benefits. Adapting to a changing environment is a personal choice and this adaptation can also be influenced by society. Policy tools can be used to drive change forward and engendering a change in behaviour. If not progressed we will miss the opportunity to sow the necessary seeds of change which can realise the aspirations of the Council, i.e. specifically Outcome 4 of the Executive Mayor of Croydon Business Plan in the long-term delivering a healthier and stronger community.

### **Option 2: Progressing HSS10 Park Hill Junior & Infants School – Stanhope Road, The Avenue, Cotelands, Crusader Gardens and Pageant Walk**

- 6.3 In respect of the Park Hill Junior & Infant School Street on Stanhope Road, The Avenue, Cotelands, Crusader Gardens and Pageant Walk, there were a significant number of objections relating to adverse traffic impacts in the local area caused by increased congestion and inconsiderate / illegal parking, indicating a dissatisfaction with the scheme under experimental traffic order. On Cotelands, there is high density housing with low car ownership and a high reliance on taxis and private hire vehicles – the Highways Team have received numerous correspondence from these residents expressing frustration that they are unable to attend / return from medical appointments due to taxis being too afraid to enter the school street zone.
- 6.4 A total of 40 objections were received for this school street, representing 50% of all the objections received. During the 2022 informal consultation, 55% of respondents within the consultation area were not in favour of the scheme.
- 6.5 Since the Section 122 RTRA justifications for the other school streets to be made permanent include securing and maintaining reasonable access to premises and facilitating passage of public service vehicles, making the Park Hill Junior & Infant School Street permanent would have an adverse impact on road safety. Although the traffic data analyses in Section 8 shows an expected decrease in traffic volumes within the school street zone, the consultation responses indicate that there is an issue with congestion in the surrounding roads, which in the long-term would reduce air quality.
- 6.6 It is therefore recommended that this scheme and its associated experimental traffic order is withdrawn.

## 7. CONSULTATION

- 7.1 Schemes introduced under an ETO invite and must allow for objections to be made for a period of 6 months from the point they come into force. Objections are permitted from anyone affected by the scheme regardless of their status. The comments received during this objection period must be considered by the Council in determining whether any changes should be made to the experiment whilst it is in force and in considering whether to proceed to a permanent TMO following the experiment.
- 7.2 Key to the success of the Healthy School Street schemes under the current Experimental Traffic Orders is comprehensive consultation and engagement with the school community and public. The Council is keen to seek the public's views when shaping highway improvement schemes.
- 7.3 To ensure that the Council has captured the views of the public carefully, the Council agreed to implement HSS schemes under Experimental Traffic Management Orders (ETOs) from 23 January 2023 which included a 6-month objection period from the start of the ETO operational date. This provided an opportunity for residents who may be directly or indirectly affected to make representations to the Council.
- 7.4 As part of the ETO process, statutory consultees were notified of the proposals. The School Streets schemes do not impact on access for any of the emergency services and the Council has not received any objections from the emergency services for any of the School Street schemes that have been implemented to date.
- 7.5 To make the process of submitting a representation as convenient as possible, the Council along with the traditional method of being able to write in, also enabled receipt of objections and comments through its 'Get Involved' web platform.
- 7.6 The Council has an active internal communications and engagement team that made announcements and publications in relation to the consultation via various means; these have been detailed below.
- Your Croydon
  - I Love Croydon Facebook page
  - I Love Croydon Instagram page
  - I Love Croydon Twitter Account
  - The Council has a dedicated Healthy School Streets website (where the consultation material was published along with background information on the Council's Healthy School Street programme)
  - A dedicated Healthy School Streets email address was set up per scheme.
- 7.7 Correspondence relating to the operation of the school streets have also been received via the following email mailboxes:
- [healthyschoolstreets@croydon.gov.uk](mailto:healthyschoolstreets@croydon.gov.uk) – general mailbox for Healthy School Street scheme queries
  - [highwayimprovements@croydon.gov.uk](mailto:highwayimprovements@croydon.gov.uk) – general mailbox for highway queries
- 7.8 The summary of findings of the 6-month statutory consultation for all nine experimental schemes is listed below.

- In total 6,342 letters were delivered across all nine schemes within the agreed 250m consultation boundary. Additionally, legal notices were placed on lamp posts in the specific school street and in the vicinity of the school street as well as published in the local press as laid out in legislation. It is important to note that although the Council chose to send letters within an agreed 250 metre boundary, anyone affected by the scheme regardless of the boundary can submit objections during the 6-month statutory objection period.
- In total 84 responses were received across all nine schemes – 69 responses were received from the Get Involved survey and 15 responses received from specific scheme email addresses – which represents a very low response rate of 1.3%. The average response rate for highway consultations in Croydon is 10%. It is worth noting that a statutory process invites representations in the form of objections only and can only consider representations made.
- The response rate for an informal consultation process can generally be higher than that of a statutory consultation stage, due to the manner in which an informal consultation process is structured and the manner in which a scheme is presented to consultees. Whereas a statutory consultation is geared at seeking representations in the form of objections and not support. It is a legal process and carried out in line with current legislation.
- The table below represents the breakdown of responses received from two sources.

Source	Objections	Support
Get Involved surveys	69	0
HSS email addresses	11	4
<b>Total</b>	<b>80</b>	<b>4</b>

- The table below shows the breakdown of objections received from individual scheme areas from the two sources.

Ref	School name	Support received	Objections received	Total responses received	Response rate
HSS1	The Crescent Primary School and The BRIT School	0	3	3	0.2%
HSS3	South Norwood Primary School	2	1	3	0.2%
HSS4	St Cyprians Greek Orthodox Primary School	0	9	9	1.4%
HSS5	Howard Primary School	0	1	1	0.1%
HSS6	Oasis Shirley Park	0	8	8	1.6%
HSS7	Good Shepherd Catholic School	0	5	5	1.1%
HSS8	Kenley Primary School	0	12	12	3.9%
HSS9	Gonville Academy	0	1	1	0.2%
HSS10	Park Hill Junior & Infants School	2	40	42	9.3%

Ref	School name	Support received	Objections received	Total responses received	Response rate
<b>Total</b>		<b>4</b>	<b>80</b>	<b>84</b>	<b>1.3%</b>

- The reason for little supportive responses is largely due to the manner in which the statutory process is set out in legislation, i.e. aimed at seeking any objections to the notice of proposal to make an experimental traffic order. In general, when a statutory process is evoked, the Council does not expect to receive support. The Council usually evaluates the level of support / opposition for any scheme through an informal consultation process which then assists in determining whether to proceed to a statutory process or not.
- HSS10 Park Hill Junior & Infant School – received a high proportion of objections totalling 40 (36 objections lodged on the online Get Involved survey and 4 emails received) out of 80 representing 50% of all objections received across the 9 Healthy School Street schemes. The objection themes were mainly impact of traffic on the local road, congestion on the surrounding roads, dangerous footway parking and difficulties for taxis and private hire vehicles entering the restricted zone, which is not addressing the Section 122 RTRA.

7.9 An analysis of responses received is outlined below. Objections received were categorised into four themes:

1. Traffic impact to a specific local road
2. Worsened traffic congestion around the school street
3. Inconsiderate or dangerous parking, including blocking of driveways
4. Inconvenience for parents
5. Displacement of traffic around the school street

7.10 The analysis was conducted taking into account all objections received for consideration (emails and Get Involved survey).

### **Analysis of objections**

7.11 Traffic impact to a specific local road

This accounted for 59% of all objections received. Respondents have identified specific local roads which have been adversely affected by traffic since the implementation of the scheme. This included increased congestion from displaced traffic and inconsiderate parking. This is addressed in 7.11 – 7.12 and 7.14.

7.12 Worsened traffic congestion around the school street

This accounted for 51% of all objections received. Residents living outside of the school street zone have expressed concern with congestion on their road. Displaced traffic is expected during the initial phases of a school street but this is expected to reduce over time as drivers' behaviours change and parents travel to school more sustainably.

7.13 Inconsiderate or dangerous parking, including blocked driveways

This accounted for 54% of all objections received and focused on vehicles parking outside of the school street zone without consideration of the local residents. This has

resulted in parking on lengths of road with waiting restrictions, pavement parking or blocking residents' driveway, often with idling engines. Whilst residents can report inconsiderate parking via the Council's Love Clean Streets app, it would not be practicable to deploy enforcement officers at all locations near school streets to carry out monitoring of poor parking behaviour and enforce illegal parking, due to limited resources within the Parking enforcement team. Often the inconsiderate drivers have driven away before the enforcement officers arrive at the reported locations.

However, using knowledge of the network and the operational issues, supplemented with the feedback received from the consultation and other customer reports, the Council will develop a schedule of targeted parking enforcement for school streets and surrounding streets. In addition, the Highways and Parking team will work jointly with the Air Quality team on issues of idling vehicles through their campaigns.

#### 7.14 Inconvenience for parents

This accounted for 32% of all objections received. Whilst the Council is aware that there will be a proportion of parents that have no choice but to drive to school, the main purpose of the scheme is to encourage more sustainable forms of travel, in particular targeting those parents that could walk to school. Parents who park outside of the school street zone would only need to walk for approximately 5 minutes to reach the school. The benefits of the school street, especially outside of the school entrances, outweighs the inconvenience of having to park slightly further away from the school.

#### 7.15 Displacement of traffic around the school street

This accounted for 33% of all the objections received and focused on traffic displacement to neighbouring roads as a direct result of the measures in place. Whilst it is accepted that the scheme has caused a degree of traffic displacement to neighbouring streets, in respect of the 8 schemes recommended to be made permanent, the displaced traffic is dissipated across a wider network of roads as parents find parking in the area. In general, during the experimental period some parents may decide to continue driving their children to school and use neighbouring streets. This behaviour may change when the schemes are made permanent as those parents who continue to use their cars may be influenced by those who walk to school and change their travel behaviour. The road safety aspect mentioned in some of the objections have been considered and in general when traffic is dissipated over a larger area there is a reduction in road danger as opposed to a concentration of traffic within a smaller section of road space near schools.

### **School Responses**

7.16 On behalf of the Council, WSP liaised with all nine schools to obtain post-trial feedback. The engagement sought insight on the school street zone, complaints or concerns, the vehicle registration portal, modal shift to more sustainable forms of transport and other general comments.

7.17 The engagement consisted of an initial phone call to the school followed by an email with a feedback form for completion.

7.18 **Question 1 – Are you satisfied with the current hours of operation with the HSS**

School name	Yes / No / Unsure	Additional comments from the school
The Crescent Primary School and The BRIT School	Yes	None
South Norwood Primary School	Yes	None
St Cyprians Greek Orthodox Primary School	Yes	None
Howard Primary School	Yes	None
Oasis Shirley Park	Yes	None
Good Shepherd Catholic School	Yes	None
Kenley Primary School	Yes	None
Gonville Academy	Unsure	2.00pm might be too early as school only finishes at 3.15pm. Therefore, 2.30pm to 3.45pm might be better hours
Park Hill Junior & Infants School	Yes	It would be better if we had more time to submit exemptions as currently, we only have until midnight each day to exempt any visitors to the school which means our workload is increased if we have visitors between 2-4pm

7.19 In general, the schools were happy with the current hours of operation. One school has suggested changes to the restricted hours to improve operation. The hours of the school streets will be reviewed at a future stage of the healthy school streets programme.

7.20 **Question 2 – Are you satisfied with the size and existing boundaries of the HSS?**

School name	Yes / No / Unsure	Additional comments from the school
The Crescent Primary School and The BRIT School	Yes	None
South Norwood Primary School	Yes	None
St Cyprians Greek Orthodox Primary School	Yes	None
Howard Primary School	Yes	None
Oasis Shirley Park	Yes	None
Good Shepherd Catholic School	Yes	None
Kenley Primary School	Yes	None
Gonville Academy	Yes	It is safer when crossing the road and we have no cars parking right outside the school gate. This has been a positive for both the school community and the school
Park Hill Junior & Infants School	Yes	None

7.21 The Group 3 schools are satisfied with the existing size of the school street zones.

7.22 **Question 3 – Have you received any concerns of complaints from parents or nearby residents regarding HSS? If yes, what has been their area(s) of concern?**

School name	Yes / No / Unsure	Additional comments from the school
The Crescent Primary School and The BRIT School	Yes	Parents complaining - easier for them to park outside school. Roads nearby are pay and display
South Norwood Primary School	Unsure	None
St Cyprians Greek Orthodox Primary School	Yes	Parents are now parking inconsiderately in Auckland Road and Wharncliffe Gardens including on the pavement and in front of houses. We have also received complaints about parents parking on the lines near the zebra crossing on South Norwood Hill'
Howard Primary School	No	None
Oasis Shirley Park	No	Some parents have noted that the signage is not big enough
Good Shepherd Catholic School	Yes	Parents parking on pavements in adjacent unaffected streets has generated complaints from local resident. This has included parents parking on driveways and blocking pavements with inconsiderate parking to drop off their children
Kenley Primary School	Yes	Yes – we have received regular complaints from nearby residents – people parking on double yellow lines – mainly around top of junction. This also causes problems for the school bus
Gonville Academy	Yes	Some parents still don't acknowledge it. Residents have explained that it took a long time to set up cameras and therefore it hasn't been in full operation
Park Hill Junior & Infants School	Yes	We have received lots of concerns about the scheme from parents, particularly working parents who drive to and from work and therefore need to drop off and collect their children during their commute, as the scheme means that side roads near the school are busier and more congested due to the restrictions and therefore, they are not able to park. We have also received lots of concerns from parents when they have received a fine and they have said that the signage is very small regarding the healthy street scheme, so they have unknowingly driven into the road during the active scheme

7.23 Most of the schools have received concerns or complaints from parents or local residents, with the key themes (*and Council response in italics*):

- Inconvenience for parents (especially working parents) who have to park further away from the school – *the purpose of the School Streets programme is to encourage parents to travel to school more sustainably. For those parents who have no option but to drive to school, the parking opportunities outside of the School Street zones are usually less than 5 minutes walk from the school entrances*
- Local residents reporting inconsiderate or illegal parking – on double yellow lines, on pavements or blocking driveways – *whilst it is disappointing to hear that drivers are parking inconsiderately and/or illegally, residents are able to report this behaviour via the Council's Love Clean Streets app, where Civil Enforcement Officers can be dispatched*
- Signage is too small and/or unclear – *at the start of the School Street zone, a Pedestrian and Cycle Zone sign is erected which meets the standards set in the Traffic Signs Manual and Generation Directions 2016 in terms of sign and text height. The Council have also installed advanced warning signs which is over and above*



*the requirements outlined in the Traffic Signs Manual*

- Cameras taking too long to be set up and therefore HSS not in full operation for the trial – *the Healthy School Street has been in operation since 23 January 2023, irrespective of when the ANPR cameras were installed. There are many examples of banned movements within the UK that are not camera enforced.*
- Congestion around the school, in particular around Park Hill Junior & Infant School – *as with most Healthy School Street schemes, there will be displacement of traffic at the initial stages as drivers avoid the restricted zone. However, the roads around Park Hill Junior & Infant School fall within the “South Permit Zone” CPZ, resulting in drivers parking on the single yellow lines and dangerously around the Stanhope Road / Chichester Road junction.*

**7.24 Question 4 – Are you aware of any modal shift from parents or staff to using more sustainable forms of transport as a result of the HSS?**

School name	Yes / No / Unsure	Additional comments from the school
The Crescent Primary School and The BRIT School	Unsure	None
South Norwood Primary School	No	None
St Cyprians Greek Orthodox Primary School	Unsure	None
Howard Primary School	No	None
Oasis Shirley Park	Unsure	None
Good Shepherd Catholic School	No	None
Kenley Primary School	No	None
Gonville Academy	Unsure	None
Park Hill Junior & Infants School	No	None

7.25 In general, the schools have been unable to determine whether there has been a modal shift to more sustainable forms of transport.

**7.26 Question 5 – Are you encouraging parents to travel to school more sustainably? If yes, what initiatives are you employing to encourage this behavioural change?**

School name	Yes / No / Unsure	Additional comments from the school
The Crescent Primary School and The BRIT School	Yes	None
South Norwood Primary School	Unsure	None
St Cyprians Greek Orthodox Primary School	Yes	We have the TFL Gold Award. We provide scooter and bike parking spaces. We promote walking to school during Walk to School Week and Weekend Walkies in KS1. In KS2 children take part in Bikeability and Walk to School Week
Howard Primary School	Yes	Active participation in following programs: Transport for London’s Travel Ambassadors, Wheels to Work, and Park and Stride

School name	Yes / No / Unsure	Additional comments from the school
Oasis Shirley Park	Yes	General encouragement to parents to park further away and walk to school
Good Shepherd Catholic School	Yes	Safe School Streets, Cycle/ Scooter Shed, Cycling Proficiency Training
Kenley Primary School	Yes	We have generally been encouraging this behavioural change
Gonville Academy	Yes	We were part of the TfL STARS programme and did do lots of travel initiatives to promote safe and healthy behaviour changes. We send out reminders to parents and pupils about safe crossing and being vigilant when walking/cycling/scooting to and from school
Park Hill Junior & Infants School	Yes	We have a scooter bay for children to park their bikes/ scooters and we encourage all parents to walk/ use public transport to school with their children if possible

7.27 Almost all the schools are generally promoting and encouraging behavioural changes towards sustainable travel and some of the schools are participating in sustainable travel programmes.

7.28 **Question 6 – Please describe your experience of using the HSS portal for registering vehicle exemptions**

School name	Working effectively?	Additional comments from the school (summary)
The Crescent Primary School and The BRIT School	No	School experienced difficulties with the portal early on in the trial. Staff were getting fines and currently still are. There has been communication with Safer Street, but the response takes 2 weeks
South Norwood Primary School	Yes	I wasn't sure how to answer that one as it does and it doesn't sometimes there is a car put in, but they sometimes still get a ticket. But Croydon are quite quick to help
St Cyprians Greek Orthodox Primary School	Not used	None
Howard Primary School	No	Following the introduction, a number of teachers were receiving warning letters and fines. Whilst this was resolved, it creates extra work for schools' office manager. The school does not have the capacity to be undertaking this additional work for Council
Oasis Shirley Park	Yes	Some staff received fines early in the process, However, Croydon Council reached out to resolve and note that there were some early teething issues with the system
Good Shepherd Catholic School	No	The portal does not work and is constantly having to deal with errors on the portal when registering visitor exemptions. Despite registering exemptions, the school regularly experiences visitors contact them to say that they have received a PCN even though they have proof that they registered the exemption on the day. The school does not have time for this additional work because of the ineffective portal. It makes them appear incompetent to visitors - as if they have not done what was promised.
Kenley Primary School	No	Staff are still receiving fines. Many of the staff registered on the first system did not carry over into the second system. You can only register a staff member for 12 months so it would be helpful to either extend this period beyond 12 months or receive a reminder when they need to renew the

School name	Working effectively?	Additional comments from the school (summary)
		registrations. Schools don't have time to undertake this admin on behalf of Council.
Gonville Academy	No	The school was not aware that they needed to re-register vehicles for new permits, leading to a negative experience for some staff members who received fines. The portal has experienced glitches when used, indicating room for improvement
Park Hill Junior & Infants School	No	There have been many instances where the portal is not working and comes up with error codes when they try to log an exemption. Staff and visitors who have already been exempted have received fines – sometimes multiple / increased fines – despite us exempting their vehicles and flagging up errors to the school street team as soon as we are notified that someone has received a penalty notice

7.29 The most common comment received from the schools relates to improvements that are required to the portal to ensure that registered vehicles do not receive PCNs and carrying over registration details onto the new portal system. The issues with the portal have since been investigated and resolved.

7.30 **Question 7 – Do you have any additional comments or feedback related to the HSS?**

School name	Additional comments from the school (summary)
The Crescent Primary School and The BRIT School	None
South Norwood Primary School	We would like visitors to do their own permit logging – we would like to find a way for them to log this with a visitors' badge as I don't want them getting a permit for longer than a day if they are visiting us
St Cyprians Greek Orthodox Primary School	None
Howard Primary School	The Healthy School Street has been a positive experience with positive feedback from parents. Parents generally quickly followed the guidance on the Healthy School Streets that was provided by the school. The HSS also created an extra bit of security/ safety for students upon entry/ exit from school
Oasis Shirley Park	None
Good Shepherd Catholic School	The trial was initially delayed for months! The signage went up but there were no cameras. Parents therefore disregarded everything and continued to drive on the school street at peak drop off and collection times. We received no communication as to the reason for no cameras being put up - despite making enquiries - until we read in the local newspaper that the cameras purchased by the Local Authority were incompatible for recording UK registration plates! We also received no notification when the cameras eventually did go up
Kenley Primary School	The main issue is that the illegal parking is causing issue for the school bus – particularly at the top of the junction
Gonville Academy	Some staff members have been late in registering their vehicles for permits, despite being employees of the school. As a result, a number of staff have received warning letters and fines for driving into school during operational hours. I believe the Council should have a better understanding and be more considerate towards employees in this regard. I personally received two fines and had to pay £130.00, even after appealing and explaining that I was a member of staff. Unfortunately, my appeal was rejected by

School name	Additional comments from the school (summary)
	Croydon Council. This is disappointing, especially considering that Gonville staff members were not aware that fines could be issued in such circumstances
Park Hill Junior & Infants School	The school street scheme has meant that we have received less concerns from parents regarding vehicles driving above the speed limit around the school and there have been no incidents of parents disagreeing with each other about parking since the scheme was introduced so the roads around the school appear to be safer for children to cross since the scheme was introduced. However, the scheme has caused a lot of additional work, demands and deadlines for administrative staff who are dealing with concerns when visitors and staff have received penalty notices incorrectly (when they have already been exempted.) The portal needs to be quicker and easier to use for staff, and there needs to be a longer window of time for staff to apply for vehicles to be exempted than the same day by midnight. The scheme has caused extra demands and work for administrative staff especially due to the amount of errors where penalty notices have been sent to staff already exempt

- 7.31 The school streets have been a positive impact for the schools, increasing safety and security for pupils. However, due to technical difficulties in the portal, there has been a greater administrative strain on the school, with staff incorrectly receiving warnings and/or PCNs.
- 7.32 The consultation report, produced by WSP, can be found in Appendix E.
- 7.33 Following the analysis of the consultation and schools feedback, the following recommendations are made for the Healthy School Streets:

School name	Recommendation
The Crescent Primary School and The BRIT School	Make permanent
South Norwood Primary School	Make permanent
St Cyprians Greek Orthodox Primary School	Make permanent
Howard Primary School	Make permanent
Oasis Shirley Park	Make permanent
Good Shepherd Catholic School	Make permanent
Kenley Primary School	Make permanent
Gonville Academy	Make permanent
Park Hill Junior & Infants School	Remove

## 8. TECHNICAL ASSESSMENTS – Do the experimental orders support the objectives which led to their introduction:

### 8.1 Road Safety

- 8.1.1 Appendix B sets out the traffic volume data for the respective school streets.
- 8.1.2 Traffic data was collected during November 2022 and September 2023 to assess the reduction in traffic volumes in the school streets.

8.1.3 An analysis of this data has been carried out to show changes in traffic volume within the school streets under the various experimental orders. The analysis shows a reduction in traffic volume in specific school streets which are the subject of this report. This reduction can be attributed to a combination of:

1. a change in travel behaviour; and
2. a transfer of traffic to neighbouring roads.

8.1.4 The table below shows the percentage decrease/increase in traffic volume in Healthy School Streets when compared with pre-restricted hours and restricted hours during the morning and restricted hours and post restricted hours during the afternoon. The percentage reduction / volume reduction is for specific roads and is bi-directional. The reduction in traffic in the eight specific school streets which are recommended to be made permanent meets the road safety objective within the Statement of Reasons in each of the ETOs. A reduction in traffic volume reduces the risk of road danger and creates a quality space for school children.

HHS ref	School	Street	AM Peak (90 mins count over 5 days)			PM Peak (120 mins count over 5 days)		
			Before	After	% diff	Before	After	% diff
HSS1	The Crescent Primary School and The BRIT School	The Crescent	2,116	594	-71.9%	2,669	1,113	-58.3%
HSS3	South Norwood Primary School	Birchanger Road	1,611	555	-65.5%	1,724	563	-67.3%
		Crowther Road	530	153	-71.1%	454	135	-70.3%
		Balfour Road	476	781	64.1%	422	742	75.8%
		Stanger Road	746	1,080	44.8%	627	998	59.2%
HSS4	St Cyprians Greek Orthodox Primary School	Ingram Road	1,743	320	-81.6%	1,757	360	-79.5%
		Springfield Road	761	256	-66.4%	688	160	-76.7%
HSS5	Howard Primary School	Dering Place	425	380	-10.6%	394	395	0.3%
HSS6	Oasis Shirley Park	Stroud Green Way	1,203	620	-48.5%	1,126	593	-47.3%
HSS7	Good Shepherd Catholic School	Dunley Drive	574	173	-69.9%	592	358	-39.5%
HSS8	Kenley Primary School	Beverley Road	1,139	1,160	1.8%	1,260	1,059	-16.0%
		New Barn Lane	228	103	-54.8%	374	101	-73.0%
HSS9	Gonville Academy	Gonville Road	819	689	-15.9%	938	870	-7.2%
HSS10	Park Hill Junior & Infants School	Stanhope Road	1,026	225	-78.1%	559	227	-59.4%
		Cotelands	580	146	-74.8%	438	190	-56.6%

8.1.4 In the table above, there have been increases in traffic on Balfour Road, Stanger Road and Beverley Road. These roads are outside of the school streets. It is recognised that there will be an element of displacement within the vicinity of the schools in the short term until travel behaviour changes over time, as more parents embrace a changed travel behaviour to more sustainable modes, such as walking, cycling and using public transport.

8.1.5 Unfortunately, data was not collected for the roads surrounding the Park Hill Junior & Infant School Street to quantify the displaced traffic. However, the consultation responses suggest that the surrounding roads are experiencing inconsiderate parking and congestion, which impacts the safe passage of public service vehicles.

8.1.6 Some respondents are opposed to changes made for the experimental school streets, as there is a perception that the Council has improved conditions outside schools, only to

create another problem in the surrounding streets, i.e. traffic displacement. It is important to note that the Council has a long-term goal across the borough to change travel behaviour to more sustainable modes through various programmes, including Healthy School Streets.

8.1.7 Road safety can be quantified through the analysis of collision data before and after implementation. In general, we have to wait for a 3-year period for any scheme to obtain robust collision statistics to quantify any safety benefits. For school streets, we can only rely on changes to traffic data over the course of the experimental period to assess the benefits of the scheme in place. The benefits being reducing the risk of exposure to traffic and hence decreasing the risk of injury collisions.

## 8.2 Air Quality:

8.2.1 Appendix C sets out the data gathered in respect of air quality impacts.

8.2.2 Air quality monitoring equipment has been installed at all the school street locations to assess any improvements in air quality following the implementation of the school streets. The Breathe London monitoring data collection commenced on 10 August 2023 and analysed for the following time periods: 16 – 20 October 2023 (term time) and 23 – 27 October 2023 (half-term). The table below summaries the average Particulate Matter (PM<sub>2.5</sub>) and Nitrous Oxide (NO<sub>2</sub>) over the two weeks for the restricted hours.

HSS	School	Street	PM <sub>2.5</sub> (µg/m <sup>3</sup> ) – average during restricted hours		NO <sub>2</sub> (µg/m <sup>3</sup> ) – average during restricted hours	
			Term time	Half term	Term time	Half term
HSS1	The Crescent Primary School and The BRIT School	The Crescent	6.2	5.9	18.5	22.6
HSS3	South Norwood Primary School	Birchanger Road	6.6	7.0	21.5	26.0
		Crowther Road	6.5	7.1	19.2	22.7
HSS4	St Cyprians Greek Orthodox Primary School	Ingram Road	4.3	4.6	18.3	19.0
		Springfield Road	6.0	6.1	21.1	22.0
HSS5	Howard Primary School	Dering Place	5.7	5.9	20.2	23.1
		Barham Road	6.0	6.1	20.9	24.1
HSS6	Oasis Shirley Park	Stroud Green Way	5.7	5.8	19.1	21.8
HSS7	Good Shepherd Catholic School	Dunley Drive	6.0	5.8	18.3	19.6
HSS8	Kenley Primary School	New Barn Lane	5.6	6.0	16.0	17.9
HSS9	Gonville Academy	Gonville Road	6.0	6.0	23.5	26.3
HSS10	Park Hill Junior & Infants School	Stanhope Road	4.3	4.6	18.3	19.0
		Cotelands	6.0	6.1	21.1	22.0

8.2.3 The table above shows that in nearly all locations, there is an improved air quality during the term time due to the school street restricted hours. However, in accordance with expert consultants working on behalf of the Council, air quality needs to be monitored over a longer timeframe than the length of an experimental order. It is also an area wide measurement not necessarily a specific street measurement given that there are weather factors which have to be taken into consideration.

## 8.3 Encouraging people to walk more:

- 8.3.1 The Napier University website <https://www.napier.ac.uk/about-us/news/school-street-closures> contains a link to the published report from where the report can be downloaded. It found an uptake of more sustainable means of travel to and from schools located in 'School Streets' thereby reducing the overall number of car journeys. Croydon formed one of the administrative study areas featured in the report. The latest available data shows that the school streets schemes installed so far have resulted in 15% to 25% reduction car use and 23% to 65% increase in active travel.
- 8.3.2 The Council has not carried out any research during the duration of the experimental period due to limited resources. In general, where the street space is relieved of high traffic volumes and congested state, there is a noticeable change in the look and feel of the road space. This could lead to a change in travel behaviour and encourage parents to walk and cycle their children to school, additionally as more parents switch to sustainable modes, increasingly it creates a chain reaction. This is also influenced by the school through various travel behaviour and road safety initiatives working collaboratively with the Council. There is also an opportunity for longer term research working collaboratively with the school communities to assess any degrees of success in terms of modal switch.
- 8.3.3 The Council will work with other boroughs who have introduced school streets within a well-established programme to look at benchmarking and best practice, including how they undertake monitoring post any decision making to make school streets permanent. Members of the Council's Highway Improvements Team will join the Pan London School Streets forum to discuss current school street issues and share best practice. This will help to inform research into and future analysis of behavioural change, shifting from car borne journeys to active travel modes and the timeline over which any change in travel behaviour has occurred. This will allow us to be more informative when we engage with our communities where we propose healthy school streets in future. It will also allow the Council to engage in a clear and informed manner with the community on matters relating to schemes where behavioural change in modal shift is a key part of the aim and objective.

## 9. CONTRIBUTION TO EXECUTIVE MAYOR'S BUSINESS PLAN

- 9.1 Healthy School Streets form an integral part of a programme within the Local Implementation Plan which delivers Outcome 4 of the Executive Mayor's business plan, i.e. ***"Croydon is cleaner, safer and healthier, a borough we can call home"***.
- 9.2 Healthy School Streets are aimed at promoting and encouraging a change in travel behaviour be it over time. Promoting active travel is key to unlock the potential to switch to sustainable travel modes in view of the on-going climatic challenges we all face. This policy tool is geared at instilling a change in travel behaviour of parents taking their children to school, equally and importantly raising awareness amongst children about the benefits of active travel on health and well-being.

## 10. IMPLICATIONS

### Financial

#### 10.1.1 Revenue and Capital consequences of report recommendations

10.1.2 The making of eight permanent Traffic Management Orders (TMOs) including officer time and the proposed removal of infrastructure for Park Hill Schools is estimated to cost £20k. The capital budget for the ETMO equipment and works is currently sitting within the Capital Parking budget (CAP39). Schemes funded by the Department for Transport's (DfT) Active Travel Fund through TfL or funded by TfL and implemented using an Experimental Traffic Order (ETO) cannot be removed using LIP funding or TfL funding.

10.1.3 If motorised vehicles, without exemption permits, were to enter the pedestrian and cycle zone they would be contravening the motorised vehicle restriction and would be subject to Penalty Charge Notice (PCN). Surplus income generated from PCNs is ringfenced for purposes detailed in Section 55 of the Road Traffic Regulation Act 1984, which includes for example transport initiatives and the Freedom Pass.

10.1.4 The delivery of the eight schemes recommended to be taken forward is consistent with the budget approved by the Council for the 2024-25 financial year.

### **10.1.5 Risks**

10.1.6 If the outcome of this report was to not proceed with the recommendations, this would result in a reduction of the projected income from 2024-25 onwards. However, this is not a relevant consideration in respect of whether or not such schemes are to be made permanent or not under the Road Traffic Regulation Act and supporting regulations. Also, it is recognised that School Street compliance will change over time, and income will therefore reduce. However, the schemes remain self-financing and bring important value through their road safety and air quality objectives.

10.1.7 Where Healthy School Streets are not made permanent the Council could be obliged to return to Transport for London the related grant income received for their development and implementation under experimental powers.

### **10.1.8 Options**

10.1.9 Substituting the proposed eight School Street schemes with an elevated physical enforcement presence by Civil Enforcement Officers and using the CCTV smart car to enforce the school zigzags would be more resource demanding and less effective – i.e. would not represent best value.

Comments approved by: Allister Bannin, Director of Finance (Deputy s151), 29/05/2024.

## **10.2 LEGAL IMPLICATIONS**

10.2.1 The Road Traffic Regulation Act 1984 (RTRA) and the Local Authorities' Traffic (Procedure) (England and Wales) Regulations 1996 (LATOPR 1996) establish the procedures for making a traffic regulation order, (including an Experimental Traffic Regulation Order). The procedural provisions for Experimental Traffic Regulation Orders are set out in Part 1 sections 9-13A of the RTRA and Regulations 22 to 24 and Schedule 2 and 5 to the LATOPR 1996. This includes details of documentation which the Council must deposit and have available for public inspection as part of the process and that any person may object within the period of 6 months from the date an experimental order comes into force, to an order making the experimental order permanent. It is incumbent on the Council to take account of any objections received to



making the experimental order permanent, and any representations made during the consultation stage must be reported back to, and considered by, the decision maker before a final decision is made. The Experimental order process also provides for amendments to be made to such orders within specified parameters under Section 10 of the RTRA, but any such amendments trigger an additional 6-month consultation period from the date the amendment is published. The maximum duration of an experimental order is 18 months (save in circumstances where the Secretary of State exercises his powers to extend to allow for a public inquiry to take place).

10.2.2 In determining whether or not to make a traffic management order, the Council is required, under Regulation 9 of the LATOPR to consider whether it is under a duty under regulation 9(3) to hold a public inquiry before making an order. Even where an inquiry is not mandated, the Council may still choose to hold an inquiry to consider objections before making any other order. The report details highways officers' consideration of these elements.

10.2.3 Regulation 23 which governs making an experimental order permanent provides that the Council is able to rely on the truncated process for approval of an experimental order being made permanent provided that the requirements of Regulation 23(3) are met and the sole effect of an order ("a permanent order"), is to reproduce and continue in force indefinitely the provisions of an experimental order or of more than one such order ("a relevant experimental order"), whether or not that order has been varied or suspended under section 10(2) of the RTRA.

10.2.4 Regulations 6 (consultation), 7 (notice of proposals) and 8 (objections) of the LATOPR 1996 shall not apply to a permanent order where the requirements specified in regulation 23 (3) have been complied with in relation to each relevant experimental order.

10.2.5 The regulation 23(3) requirements are that:

- a) the notice of making contained the statements specified in Schedule 5;
- b) deposited documents (including the documents referred to in sub-paragraphs (c) and (e)) were kept available for inspection in accordance with Schedule 2 throughout the whole of the period specified in regulation 22(4);
- c) the deposited documents included a statement of the order making authority's reasons for making the experimental order;
- d) no variation or modification of the experimental order was made more than 12 months after the order was made; and
- e) where the experimental order has been modified in accordance with section 10(2) of the 1984 Act, a statement of the effect of each such modification has been included with the deposited documents.

10.2.6 In applying regulations 10, 11 and 13 and Schedule 3 of LATOPR 1996 to a permanent order to which regulations 6, 7 and 8 do not apply by virtue of regulation 23 (2) —

- a) the notices of making published in respect of each relevant experimental order shall be treated as the notice of proposals published under regulation 7(1)(a) in respect of the permanent order;
- b) any objection made in accordance with the statement included by virtue of paragraph (3)(a) in the notice of making published in respect of a relevant experimental order shall be treated as an objection duly made under regulation 8 to the permanent order.

10.2.7 By virtue of section 122 of the Road Traffic Regulation Act 1984 (RTRA), the Council must exercise its powers under the RTRA (including making experimental traffic orders under Section 9) so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway having regard to:

- The desirability of securing and maintaining reasonable access to premises;
- The effect on the amenities of any locality affected and the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
- The national air quality strategy;
- The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
- Any other matters appearing to the local authority to be relevant.

10.2.8 The RTRA is not a fiscal measure nor is its purpose revenue raising. In considering whether or not to approve the recommendations within the report the Council must have proper regard to the matters set out at section 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision. The Court of Appeal (in *Trail Riders Fellowship v Hampshire County Council* [2019] EWCA Civ 1275 (18 July 2019)) examined the relationship between section 122 and a Council's traffic management order-making powers and established that the approach should be for the decision-maker to: have in mind the section 122(1) duty; then have regard to factors which may point in favour of imposing a restriction on movement of traffic and pedestrians (including all the factors in section 1); and finally balance the various considerations and come to the appropriate decision.

10.2.9 Section 16 of the Traffic Management Act 2004 imposes 'The Network Management Duty', requiring a local traffic authority to manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives:

- a) securing the expeditious movement of traffic on the authority's road network; and
- b) facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.

10.2.10 The action which the authority may take in performing that duty includes, in particular, any action which they consider will contribute to securing:

- a) the more efficient use of their road network; or
- b) the avoidance, elimination or reduction of road congestion or other disruption to the movement of traffic on their road network or a road network for which another authority is the traffic authority. For these purposes, 'traffic' includes pedestrians.

10.2.11 The Greater London Authority Act 1999 ("GLA 1999") places a duty on each London local authority to have regard to the Mayor of London's Transport Strategy when exercising any function. This therefore includes the exercise of its Traffic Management Duty (pursuant to s16 of the Traffic Management Act 2004) and when deciding whether to make a traffic order.

- 10.2.12 Under section 159 of the GLA 1999 Transport for London (TfL) may give financial assistance to a London local authority by way of a grant, loan or other payment, to provide safe, integrated, efficient and economic transport facilities or services to, from or within Greater London.
- 10.2.13 In exercising its powers under section 159, TfL may have regard to any financial assistance previously given and the use made by the authority of such assistance. TfL may also impose conditions on any financial assistance it provides, including conditions for repayment in whole or in part in specified circumstances.
- 10.2.14 In taking decisions and bringing forward these proposals, regard should be had to the provisions of the Human Rights Act 1998. In particular, the provisions of Article 1, of the First Protocol protection of property and Article 8, right to respect for private and family life. In relation to Article 8, right to respect for private and family life has a broad interpretation and extends to being in a public place if there is a reasonable expectation of privacy there. This right can be interfered with where lawful, necessary and proportionate to protect a number of other concerns including public safety and health. These human rights should be considered. To the extent that it is considered that they are infringed the proposals should only go ahead if it is considered that the infringement is necessary and proportionate.
- 10.2.15 When considering the Public Sector Equality Duty (PSED) under Section 149 of the Equality Act 2010, decision makers must evidence consideration of any potential impacts of proposals on groups who share the protected characteristics, before decisions are taken. This is detailed in Section 10.3 and Appendix D.
- 10.2.16 Where Automatic Number Plate Recognition (ANPR) is used, the Council must ensure it adheres to the Investigatory Powers Commissioner's Office Guidance (previously Office of the Surveillance Commissioner) and Information Commissioner Guidance, where appropriate. Officers will need to ensure that data protection matters, including the use of ANPR are addressed via the necessary data protection impact assessments.
- 10.2.17 Statutory guidance published by the Secretary of State for Transport under section 87 of the Traffic Management Act 2004 (TMA) "Statutory guidance for local authorities in England on civil enforcement of parking contraventions", October 2022 provides that for good governance, enforcement authorities (such as the Council) need to forecast revenue in advance. But raising revenue should not be an objective of civil parking enforcement, nor should authorities set targets for revenue or the number of Penalty Charge Notices (PCNs) they issue. Enforcement should run their enforcement operations (both on- and off-street) efficiently, effectively and economically. The income from on-street charging and any penalty charge payments received (whether for on-street or off-street enforcement) must only be used in accordance with section 55 (as amended) of the Road Traffic Regulation Act 1984. London authorities must keep an account of all income and expenditure in respect of on-street parking places and their functions as enforcement authorities, within paragraphs 2 and 3 of schedule 7 to the Traffic Management Act 2004. The Road Traffic Act 1984 is not a fiscal measure but if an authority makes a surplus on its on-street parking charges and on-street-and-off-street enforcement activities, it must use the surplus in accordance with the detailed legislative provisions and restrictions in section 55 (as amended) of the Road Traffic Regulation Act 1984.

10.2.18 Comments approved by Sandra Herbert Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. (Date: 02/07/2024)

### **10.3 EQUALITIES IMPLICATIONS**

10.3.1 The Equality Act 2010 introduced the Public Sector Equality Duty. This requires all public bodies, including local authorities, to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

10.3.2 An Equalities Impact Assessment (EqIA) has been completed to cover the Healthy School Streets that are recommended to be permanent and recommended to be withdrawn, and is included in Appendix D.

10.3.3 The School Streets' operational concept is unchanged since they were first introduced 2017. This project is intended to restrict access for motor traffic at the start and end of the school day except resident permit holders, cyclists, emergency services and certain other groups such as carers and those with disabilities. This would support objectives to improve air quality and would benefit the more vulnerable, such as pregnant mothers, children, those with debilitating respiratory illnesses with secondary health benefits for the wider communities.

10.3.4 Feedback from the representations received as part of the statutory objection periods has been addressed in the EqIA.

10.3.5 The EqIA has identified both positive and negative impacts for the protected characteristics, summarised below:

#### Positive impacts

- Making the eight school streets permanent would continue to provide a safer environment outside the schools, which would encourage active travel not just for school pupils and their parents/guardians, but also residents of the local community. This would provide a positive impact for all nine of the protected characteristics.
- More women accompany their children to school compared to men so would benefit more from the reduced congestion, increased road safety and improved air quality.
- There is evidence that air quality affects children and young people and therefore the Healthy School Streets would help to address this inequality. However, older people, those with disabilities and pregnant women would also benefit from improved air quality. Section 8.2 of this report demonstrates that air quality improves during the restricted time periods compared to the school holidays.
- The experimental period of the Park Hill Junior and Infant Healthy School Street created congestion and dangerous parking within the vicinity of the restricted zone.

This adversely affected the large number of elderly residents within this area who had difficulties registering their carers' vehicles for exemptions and the reluctance of taxis entering the school street for pick-up/drop-off. This Healthy School Street has been recommended to be removed and provides a positive impact for both the protected age and disability characteristics.

### Negative impacts

- Some respondents to the statutory consultation have expressed concern of not being able to drive close to the school entrance if their child was ill or has a disability. However, the Council has made provisions to the schools to request access on their behalf in such circumstances.
- There may be individuals who are not aware that they could be eligible for an exemption even in limited special circumstances. Residents who have registered carers are able to apply for a permit for the carer's vehicle. As a mitigation measure the Council will inform the public of the potential exemptions they may be able to apply for.
- People who do not speak English or have poor English skills may struggle to access information about the school street operation and how to apply for an exemption permit. The Council will ensure that there are interpreting services to support these residents.
- Pregnant residents who drive to the school but are not eligible for an exemption permit would be required to park further away and continue their journey by walking. As a mitigation measure the Council can issue temporary exemptions on a case-by-case basis if needed.

10.3.6 Comments approved by Ken Orlukwu, Senior Equalities Officer, on behalf of Helen Reeves, Head of Strategy & Policy on 02/07/2024.

## **11. APPENDICES**

**Appendix A** Consultation methodology and analysis

**Appendix B** Traffic data

**Appendix C** Air Quality data

**Appendix D** Equality Impact Assessment

**Appendix E** WSP Consultation Report

## **12. SUPPORTING DOCUMENTS**

- Report on the Results of Informal Public Consultations on 11 Healthy School Streets (Pedestrian and Cycle Zone only) - <https://democracy.croydon.gov.uk/ieDecisionDetails.aspx?ID=949>

## **13. BACKGROUND DOCUMENTS**

None