

REPORT TO:	Cabinet 12 October 2022
SUBJECT:	Report on the results of informal public consultations on 11 Healthy School Streets (Pedestrian & Cycle Zone only)
LEAD OFFICER:	Nick Hibberd – Corporate Director of Sustainable Communities, Regeneration & Economic Recovery Steve Iles - Director of Sustainable Communities
CABINET MEMBER:	Councillor Scott Roche Cabinet Member for Streets & Environment
WARDS:	Multiple

SUMMARY OF REPORT:

The implementation of further Healthy School Streets (HSS) builds on the council's commitment to making streets outside our schools safer and healthier for children, parents, and residents.

This report presents the results of the informal consultation, which sought the public's view on the possible introduction of 11 new Healthy School Streets under Experimental Traffic Management Orders (ETMOs) for a maximum period of 18 months. The consultation was carried out over a one month period between 1 July 2022 to 30 July 2022.

The informal consultation was across multiple channels, including distribution of 8,345 letters and messaging on the council's website and social media channels. However, we unfortunately received a low response rate, with only 531 responses received (representing a 6% response rate). The importance of community feedback is recognised and to ensure we are listening to the community the recommendation is that the proposed schemes are taken forward as experiments to allow the community to assess the "real" impacts of the schemes.

Although, the council consulted on 11 Healthy School Street schemes, officers are recommending to the Executive Mayor of Croydon that only 9 Healthy School Street schemes are taken forward for implementation, with 2 schemes not being taken forward, as listed in the tables below.

This recommendation is being made following comprehensive analysis of the consultation responses received together with the council's assessment on the anticipated benefits of the schemes.

9 schemes to be progressed to ETMO:

Ref:	School Name(s)	Affected Road (s)	Ward (s)
HSS 1	The Crescent Primary School & Brit School	The Crescent & Saracen Close	Selhurst
HSS 3	South Norwood Primary School	Birchanger Road, Crowther Road & Gresham Road	South Norwood

HSS 4	St Cyprians Greek Orthodox Primary School	Ingram Road & Springfield Road	Norbury Park
HSS 5	Howard Primary School	Dering Place & Barham Road	Waddon
HSS 6	Oasis Shirley Park	Stroud Green Way	Shirley North
HSS 7	Good Shepherd Catholic School	Dunley Drive & Walker Close	New Addington North
HSS 8	Kenley Primary School	Mosslea Road & New Barn Lane	Kenley
HSS 9	Gonville Academy	Gonville Road	West Thornton
HSS 10	Park Hill Junior & Infants School	Stanhope Road & The Avenue	Park Hill & Whitgift

2 schemes not being progressed to ETMO:

Ref:	School Name(s)	Affected Road (s)	Ward (s)
HSS 2	Harris Academy South Norwood	Cumberlow Avenue	South Norwood
HSS 11	Krishna Avanti Primary School	Southbridge Place	Waddon

The report further sets out the following:

1. Background information on the council's Healthy School Street programme.
2. Highways and Parking Service's agreed consultation and engagement strategy for Healthy School Streets
3. Consultation methodology and analysis
4. Details on schemes recommended to be taken forward for implementation with agreed amendments
5. Design drawings of all proposed 11 Healthy School Streets as consulted upon labelled as **Appendix A**
6. Consultation leaflets for all proposed 11 Healthy School Street schemes labelled as **Appendix B**
7. Design drawings of the proposed amendments to 1 out of the 9 schemes recommended to be taken forward for implementation labelled as **Appendix C**
8. Equalities Impact Assessment, **Appendix D**
9. Data Protection Impact Assessment, **Appendix E**
10. Consultation analysis, **Appendix F**

Should the schemes be agreed for implementation under an 18 month ETMO, officers will produce a future report outlining any objections received during the 6 month objection period and make further recommendations on whether the schemes should be made permanent or not. The report will be produced within the ETMO period (within 18 months from implementation date).

FINANCIAL IMPACT:

- The introduction of the proposed Experimental Traffic Management Orders (ETMOs) including officer time and on-street changes is estimated to be £230,000

- In addition, the cost of collecting monitoring data (both traffic and air quality data) is estimated to be £60,000

Budget to meet these costs is available from the operational capital budget for Parking.

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). The surplus income generated from PCNs is ringfenced for transport initiatives and the Freedom Pass.

The delivery of the 9 schemes recommended to be taken forward is consistent with the budget approved by the council for 2022/23 financial year.

KEY DECISION REFERENCE NO.: 4522EM The notice of the decision will specify that the decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee.

The Executive Mayor has the power to make the decisions set out in the recommendations contained within this report. The Executive Mayor agrees to the following subject to compliance with statutory requirements:

RECOMMENDATIONS:

- i. Officers from the council's Highways & Parking Service recommend to the Executive Mayor of Croydon that the following 9 Healthy School Street schemes are taken forward for implementation under ETMOs, with proposed amendments to HSS 10 scheme as detailed in this report:

Ref:	School Name(s)	Affected Road (s)	Ward (s)
HSS 1	The Crescent Primary School & Brit School	The Crescent & Saracen Close	Selhurst
HSS 3	South Norwood Primary School	Birchanger Road, Crowther Road & Gresham Road	South Norwood
HSS 4	St Cyprians Greek Orthodox Primary School	Ingram Road & Springfield Road	Norbury Park
HSS 5	Howard Primary School	Dering Place & Barham Road	Waddon
HSS 6	Oasis Shirley Park	Stroud Green Way	Shirley North
HSS 7	Good Shepherd Catholic School	Dunley Drive & Walker Close	New Addington North
HSS 8	Kenley Primary School	Mosslea Road & New Barn Lane	Kenley
HSS 9	Gonville Academy	Gonville Road	West Thornton

	HSS 10	Park Hill Junior & Infants School	Stanhope Road & The Avenue (<i>as amended</i>)	Park Hill & Whitgift
--	--------	-----------------------------------	--	----------------------

If the above recommended school streets are agreed to proceed, the following will need to form part of the decision to ensure that the experimental schemes progress smoothly during the 18-month trial period.

- i. Provide the relevant delegated authority to the Road Space Manager, Sustainable Communities Division to make the required ETMOs which will be valid for a maximum period of 18 months. The first 6 months will serve as the statutory objection period.
- ii. Authorise officers to implement relevant parking, waiting and/or loading restrictions required to support the successful operation of the experimental school street schemes.
- iii. Authorise officers to install the relevant equipment that allows the collection of traffic and air quality data for the 9 School Street sites.

1. Executive Summary

- 1.1 The purpose of this report is to outline the results of the informal consultation carried out on the introduction of 11 new Healthy School Street (HSS) schemes under Experimental Traffic Management Orders (ETMOs) for a maximum period of 18 months. Based on the outcome of the consultation, this report makes recommendations to and seeks authorisation from the Executive Mayor of Croydon to implement 9 of the 11 Healthy School Streets schemes consulted upon as detailed in this report.
- 1.2 Healthy School Street schemes help the school communities to tackle concerns around air pollution, poor health, and road danger. They are implemented by restricting motorised traffic from entering the road (s) outside the school at drop – off and pick – up times. This results in a safer, healthier, and pleasant environment for all. The intended outcomes are to achieve healthier lifestyles, active travel, and better street environment.
- 1.3 Key to the success of any Healthy School Street scheme is comprehensive consultation and engagement with the community. The council is keen to seek views when shaping highway improvement schemes.
- 1.4 The Executive Mayor’s pledge prior to his election was that he wanted to ensure the council listens to the community. To ensure we are taking on board the valuable feedback from community, the council has an agreed two step approach to implementation of these School Street schemes. The first step is the informal public consultation stage, where we seek the community’s views informally on the council’s intention to introduce Healthy School Streets.
- 1.5 Given the relatively low response rate to the informal consultation (only 6% of those consulted responded) it is important that the community can inform the council of their views on the schemes in another way. The mechanism to achieve this will be to implement the schemes as experiments and invite

comments. This will allow the community to assess the “real” impacts of the schemes. These experiments will be implemented using Experimental Traffic Management Orders (ETMOs), which include an initial 6-month statutory objection period, during which the public is invited again, to formally submit objections on the schemes.

1.6 This report together with the supporting appendices presents the results and officer findings of the above explained informal consultation to Executive Mayor of Croydon for decision making on the future of the mentioned 11 Healthy School Street schemes.

1.7 The findings of the informal public consultation have been summarised below:

- 8,345 leaflets delivered across all 11 HSS schemes within the agreed 250m consultation areas.
- 531 responses received from within the 250m consultation area. This represents a response rate of 6%, this is far less than the average response rate of 10% expected for similar consultations.
- The council received 358 responses from those beyond the 250m area that wouldn't have received a council issued leaflet.
- Total responses combined from both within and outside is 889
- Across all 11 HSS schemes the response rate in favour from those within the 250m consultation area is 40% (212) 60% (319) not in favour.
- Across all 11 HSS schemes the response rate in favour from those outside the consultation area is 39% (140), 60% (215) not in favour and 1% (3) undecided.

2. BACKGROUND

2.1 The council wants Croydon's streets to be safe spaces for the public to walk and cycle, for children to get to and from school safely, for businesses to grow and for the air that we all breathe to be cleaner.

2.2 Croydon intends to ensure that the borough has a cleaner, sustainable recovery from the pandemic encouraging healthier travel helping us to deliver Croydon's Transport Strategy and more widely the London Mayoral Transport Strategy. To help address challenges coming out of the pandemic around climate change, congestion, road safety issues and poor air quality.

2.3 The council's Parking Policy 2019-2022 aims to effectively manage parking provision across the borough in line with the Corporate Plan and the borough's growth objectives. Section 4 of this policy details the School Streets objectives, to ensure we secure a healthy and safe environment near to schools and to help children and parents use cars less and to walk, cycle and use public transport more. The school run presents a particularly harmful combination of air pollution and inactivity for our children and parents.

2.4 The Coronavirus (COVID-19) pandemic has changed how people live, study, work, and travel in Croydon. The start of the pandemic saw the public

alternating their daily routines, with a lot more people choosing to work from home and using local streets for exercise and leisure. This change in people's habits have made homes, local streets, neighbourhoods, and the local public realm more important than ever.

Evidence for Healthy School Streets:

- 2.5 The health impacts on children from air pollution and inactivity is not alleviated until a significant proportion of parents stop non-essential car use. Parents will not stop using the car until the school entrance feels safe. The causal link tells us that addressing the perception of road safety near to the school entrance can impact positively on air quality and health.
- 2.6 School street traffic at the start and end of the school day does not relate solely to the school run. In some school roads there is also an element of commuter traffic using the road as a so-called rat run. The amount of such commuter traffic is additionally influenced by the increased car ownership and use.
- 2.7 Several school roads have reached saturation point at the start and end of school days – meaning that in the most severe places there is practically no road space left for the problem to worsen. What is changing, however, is the awareness of and attitude towards air pollution. In Croydon's online public engagement survey carried out in September 2018¹, 86% of 994 respondents agreed that traffic levels are too high in Croydon and 72% agreed it should be lowered. 74% agreed they are concerned about air quality. 62% agreed they would use the car less if the alternatives were better. 57% agreed they would walk more and 39% would cycle more if conditions were right.
- 2.8 Those residents that live on a street home to a school, find their street to be exceptionally congested, polluted, and unsafe every weekday at pick up and drop off times. As a result, they struggle to enjoy the streetspace outside their home for play and active travel. School run-related traffic accounts for a quarter of cars on the road and adds 254,000 vehicles a day in London alone.
- 2.9 The council has already 14 successful permanent Healthy School Streets in place since 2017, with an additional 10 installed in April 2022 under ETMOs taking the total to 24. These schemes are welcomed by the schools and pupils they serve. Over time they do result in a shift from staff, parents and pupils relying on the motor vehicle to travel to and from school to using more sustainable forms of transport. This has a positive impact on the local street environment and the health of young children.
- 2.10 The DfT continues to expect boroughs to introduce measures that reallocates road space to people walking and cycling. The focus post-pandemic is now on devising further schemes and assessing temporary schemes installed during the pandemic with a view to making them permanent. Healthy School Streets are part of that initiative and commitment to introduce schemes that continue to encourage sustainable active travel. For those that must use a car to travel to and from school such as persons with disabilities or a need to carryout statutory

functions for which a motor vehicle is essential, the council has an agreed permit and exemption scheme in place administered by the council's Highways & Parking Service.

2.11 The table below indicates the average distance that would be travelled in minutes if pupils and parents opted to cycle or walk to and from their school. The travel time is estimated based on how far 75% of pupils in attendance live from the given school. The data used has been taken from the latest available information on: <https://maps.london.gov.uk/schools/>. Data for Krishna Avanti School and Oasis Shirley Park wasn't available as these schools were opened after the latest data had been captured.

Ref:	School Name(s)	75% of pupils live within X min walking distance	75% of pupils live with x min cycling distance
HSS 1	The Crescent Primary School & Brit School	20 minutes	8 minutes
HSS 2	Harris Academy South Norwood	20 minutes	8 minutes
HSS 3	South Norwood Primary School	12 minutes	4 minutes
HSS 4	St Cyprians Greek Orthodox Primary School	35 minutes	15 minutes
HSS 5	Howard Primary School	12 minutes	4 minutes
HSS 6	Oasis Shirley Park	No data available	No data available
HSS 7	Good Shepherd Catholic School	15 minutes	6 minutes
HSS 8	Kenley Primary School	40 minutes	18 minutes
HSS 9	Gonville Academy	12 minutes	4 minutes
HSS 10	Park Hill Junior & Infants School	10 minutes	3 minute
HSS 11	Krishna Avanti Primary School	No data available	No data available

The table above shows the following:

- 9 out of the 9 schools can be reached by bike in less than 20 minutes by 75% of pupils based on the place of abode.
- 7 out of the 9 schools can be reached by bike in less than 10 minutes by 75% of pupils based on the place of abode.
- 7 out of the 9 schools can be reached by walking in 20 minutes or less by 75% of pupils based on the place of abode.
- 5 out of the 9 schools can be reached by walking in 15 minutes or less by 75% of pupils based on the place of abode.

Why existing control measures are no longer effective:

2.12 A weakening in conventional parking control measures at schools has resulted from the Deregulation Act 2015. Prior to the Act, a camera vehicle was a strong deterrent to parking contraventions near to school entrances. A single camera

vehicle could efficiently cover many schools daily. Public opinion however perceived this method of enforcement as being over-zealous and the 2015 Act removed the powers to use camera enforcement for most parking contraventions. Camera enforcement is now mainly associated with moving traffic offences.

- 2.13 Manual enforcement, by patrolling Civil Enforcement Officers (CEO), is a weaker deterrent to parking contraventions near to school entrances. School parents tends to wait in or near to their vehicles and will simply move on once a CEO shows up and starts recording vehicle details. Most will simply drive around the block and park up again once the CEO has left the road. It is practically impossible to have permanent presence of CEO's for moving on drivers at the more than 130 schools in the borough.
- 2.14 The manual method of enforcement also regularly results in undesirable incidents of arguments and foul language from drivers, which can be intimidating and set a bad example in front of the children.

How will the council measure success?

- 2.15 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 STARS and Living Street's WoW Travel Tracker initiatives. STARS 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.
- 2.16 A formal 6-month objection period will commence from the date the ETMOs come into force. This will provide the public a further opportunity to express their views on the schemes being made permanent. Officers will review the objections made and attempt to address them during the objection period. An option to amend the schemes in response to feedback given is available to officers to better the schemes if it's found that amendments are feasible and beneficial to the local community. However, any changes to the scheme may result in a restart of the 6-month ETMO objection period.
- 2.17 The council will call on the affected schools to participate in monitoring the impacts of the scheme. The schools can support the schemes by carrying out what are known as 'Hands Up Surveys' both before and after the schemes are implemented. The surveys are conducted in the school environment whereby pupils are asked the method of travel to and from school before the scheme has been implemented a similar survey is carried out after the school street is installed to determine if the method of travel has now changed. For example, a survey conducted may show that a high number of pupils were travelling to and from school by car, but since its implementation they are now walking instead.
- 2.18 The council will carry out its own monitoring through the installation lamp column mounted sensors that monitor all types of traffic in real time 24/7 with data uploaded on a portal that can be accessed directly by officers. The data will allow

us to understand behavioural trends and interactions between transport modes. The sensors are installed before the implementation of the agreed HSS schemes to capture an accurate baseline and this is compared with the data gathered following the implementation of the scheme to identify any changes in behaviour.

- 2.19 For Air Pollution monitoring they council will be installing Breathe London Sensors. Breathe London, maps and monitors air pollution across London, with over 100 sensors installed by Breathe London alone in 2019 and further funding granted to Breathe London for a further 100 in 2021 by the Mayor of London. Using Breathe London for air pollution monitoring allows us to compare air pollution data local to Croydon to other parts of the capital. The Breathe London sensors will be installed outside the school before the scheme is installed and will be monitored throughout the experimental period to determine if the scheme has had an impact on air pollution. Its anticipated a reduction in air pollution will be observed during school street operational hours.
- 2.20 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 by clicking [here](#).

3. PROPOSALS

- 3.1 The council consulted on 11 Pedestrian and Cycle Zone only schemes, more commonly known as Healthy School Street schemes. The council proposed all the 11 Healthy School Street schemes operate between the hours of 08.00 – 9.30am and 2-4pm Mon – Fri during school term time only. Several agreed permits or exemptions are made available to permit access during the periods of restriction for those that need it as detailed below. The operational times and agreed exemptions are consistent with those that apply to the existing 24 Healthy School Street schemes in operation across the borough. The streets selected for a proposed School Street scheme were because both the school and residents had reported to the council problems with traffic, congestion, noise and air pollution during pick up/drop off times.

- 3.2 The table below set out the scheme proposals consulted on and the roads that the zone would affect:

Ref:	School Name(s)	Affected Road (s)	Ward (s)
HSS 1	The Crescent Primary School & Brit School	The Crescent & Saracen Close	Selhurst
HSS 2	Harris Academy South Norwood	Cumberlow Avenue	South Norwood
HSS 3	South Norwood Primary School	Birchanger Road, Crowther Road &	South Norwood
HSS 4	St Cyprians Greek Orthodox Primary	Ingram Road & Springfield Road	Norbury Park

Ref:	School Name(s)	Affected Road (s)	Ward (s)
HSS 5	Howard Primary	Dering Place &	Waddon
HSS 6	Oasis Shirley Park	Stroud Green Way	Shirley North
HSS 7	Good Shepherd Catholic School	Dunley Drive & Walker Close	New Addington North
HSS 8	Kenley Primary School	Mosslea Road & New Barn Lane	Kenley
HSS 9	Gonville Academy	Gonville Road	West Thornton
HSS 10	Park Hill Junior & Infants School	Stanhope Road & The Avenue	Park Hill & Whitgift
HSS 11	Krishna Avanti Primary School	Southbridge Place	Waddon

4. INFORMAL PUBLIC CONSULTATION

- 4.1 The informal consultation stage is an early engagement for purpose of gauging opinions and receiving feedback to verify the initial assumptions for a proposal. It is an invitation to residents, businesses and occupiers/operators of amenities in the locality to contribute their first-hand experiences and observations that are otherwise not obviously available to the local authority officers. The consultees were invited to propose changes to the initially suggested zone layout. The engagement effectively enables people in the locality to co-design the scheme.
- 4.2 The consultation launched on 1 July 2022 and expired at midnight on 30 July 2022. It was published on all digital platforms in tandem with announcements made about the consultation through a council press release and newsletter. In total 8,345 leaflets were delivered, and 531 responses were received, representing a response rate of 6%, the average response rate from consultations in Croydon 10%. All 11 consultation leaflets issued have been appended to this report labelled as Appendix B. Note: the response rate is based on the number of leaflets delivered to those within the consultation area (250 metre boundary) and responses received from the same only.
- 4.3 **250metre consultation boundary:** To fully understand and appreciate the consultation analysis as presented in this report, it is important to note the consultation boundary, its definition and categorisation.
- 250metre boundary: the council has chosen to consult properties that fall within 250metres of the extents of the proposed healthy school street scheme by sending them a consultation leaflet. This is consistent with the method use previously when consulting on the existing 24 school streets.
 - The distance of 250 metres is measured as road length from the various entry points to any one scheme.
 - For analysis purposes those properties that fall within 250metres from the extents of the school street proposal that would have received a consultation leaflet are categorised as responses from properties “**Within the area**”. Those responses received from persons beyond the 250metre consultation

boundary are categorised as responses from “**Outside the area**”, this could be responses from those live, work, study anywhere in Croydon and beyond it is an undefined area as anyone who feel that they may be impacted by the proposals can respond.

Analysis of responses from those **within** the consultation boundary and those from **outside** is important because depending on how close they live, work or study to the proposals, the impacts you feel or perceive could vary, therefore the feedback given will be different.

In line with good practice the council installed street notices in the vicinity of the school. 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 with links to the relevant publications:

- 1) Your Croydon: <https://news.croydon.gov.uk/croydon-proposes-11-new-healthy-school-street-schemes-consultation-launches-today/>
- 2) I Love Croydon Facebook page
- 3) I Love Croydon Instagram page
- 4) I Love Croydon Twitter Account:
<https://mobile.twitter.com/yourcroydon/status/1547651390935166981>
- 5) The council has a dedicated Healthy School Streets website (www.croydon.gov.uk/school-streets), where the consultation material was published along with background information on the councils Healthy School Street programme
- 6) A dedicated Healthy School Streets email was set-up for enquiries – healthyschoolstreets@croydon.gov.uk

The tables below provide summary results across the 11 schemes:

All 11 School Proposals			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	8345	531 6%	319 60%	212 40%	-
Outside consultation area	-	358	215 60%	140 39%	3 1%
Total	8345	889	534 60%	352 40%	3 0%

The Crescent Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	1306	48 4%	23 48%	25 52%	-
Outside consultation area	-	55	37 67%	17 31%	1 2%
Total	1306	103	60 58%	42 41%	1 1%

Harris Academy South Norwood			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	884	13 1%	10 77%	3 23%	-
Outside consultation area	-	5	2 40%	3 60%	-
Total	884	18	12 67%	6 33%	-

South Norwood Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	1417	72 5%	56 78%	16 22%	-
Outside consultation area	-	40	23 58%	17 42%	-
Total	1417	112	79 71%	33 29%	-

St Cyprian Greek Orthodox Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	643	65 10%	46 71%	19 29%	-
Outside consultation area	-	14	8 57%	6 43%	-
Total	643	79	54 68%	25 32%	-

Howard Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	854	23 61%	14 39%	9	-
Outside consultation area	-	28	12 43%	16 57%	-
Total	854	51	26 51%	25 49%	-

Oasis Shirley Park Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	485	33 7%	18 55%	15 45%	-
Outside consultation area	-	8	4 50%	4 50%	-
Total	485	41	22 54%	19 46%	-

Good Shepherd Catholic Primary			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	450	28 6%	12 43%	16 57%	-
Outside consultation area	-	44	29 66%	14 32%	1 2%
Total	450	72	41 57%	30 42%	1 1%

Kenley Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	307	62 20%	35 56%	27 44%	-
Outside consultation area	-	25	19 76%	6 34%	-
Total	307	87	54 62%	33 38%	-

Gonville Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	429	44 10%	13 30%	31 70%	-
Outside consultation area	-	31	16 52%	15 48%	-
Total	429	75	29 39%	46 61%	-

Stanhope Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	451	69 15%	38 55%	31 45%	-
Outside consultation area	-	50	22 44%	27 54%	1 2%
Total	451	119	60 50%	58 49%	1 1%

Krishna Avanti Primary School			Opinions		
Distance	Letters	Responses	No.	Yes	Unsure
Within consultation area (250m)	1119	74 7%	54 73%	20 27%	-
Outside consultation area	-	58	43 74%	15 26%	-
Total	-	132	97 73%	35 27%	-

4.4 In summary the results overall show that those responded are opposed to the introduction of HSS schemes, however officers believe this is primarily attributed to the following 3 elements:

- 1) Low response rate – the consultation only received an average response rate of 6%, suggesting further engagement is required. Given the relatively low response rate to the informal it is important that the community can inform the council of their views on the schemes in another way. The mechanism to achieve this will be to implement the schemes as experiments and invite comments. This will allow the community to assess the “real” impacts of the schemes. These experiments will implemented using Experimental Traffic Management Orders (ETMOs), which include an initial 6-month statutory objection period, during which the public is invited again, to formally submit objections on the schemes.

- 2) Displacement of traffic on surrounding roads – there is a perception that this will occur, but is not a given. Officers will measure the impacts of the scheme through extensive monitoring as described in this report, if the schemes are agreed to be implemented under ETMOs.
- 3) Access issues for deliveries etc – the council operates a flexible permit exception scheme. Several exemptions are offered and can be applied for in situations where legitimate access is needed.

4.5 As a result of the consultation analysis presented above and based on the council's own assessment of the schemes, officers recommend to the Executive Mayor of Croydon to proceed with all schemes to implementation under ETMO except for HSS 2 & HSS 11 for the following reasons:

4.6 **HSS 2 Cumberlow:** the school responded to say that pupils access the school primarily for the South Norwood High Street. The access on Cumberlow Avenue is used for deliveries and teachers, installing school street scheme here will not benefit the school or pupils, in fact it will have the opposite impact making it difficult for deliveries. South Norwood High Street, home to several businesses, several bus routes and a key access road cannot be converted into a school street.

4.7 **HSS 11 Southbridge Place:** the school responded to say that whilst it appreciates the council intention to implement a school street scheme, the school is not supportive of one, but instead would like the council to install other supplementary measures such as zebra crossing. The council's engineers have reviewed Southbridge Place and found that the road is one way, has a signed speed limit of 20mph, traffic calming is in place in the form of road humps. Narrow footways along Southbridge Place and the presence of parking bays mean that installation of zebra crossing is not feasible without a significant loss of on street parking and extensive engineering works to widen the footway to install a zebra crossing. As several traffic calming measures are already in place the council will not be installing further supplementary measures.

4.8 All the responses have been placed into 32 different themes; the following 10 themes have been identified as the most common:

Theme	Number of responses
The scheme will cause displacement of traffic and congestion	294 (55%)
The scheme will make it difficult for working parents, visitors, and residents	267 (50%)
The scheme will make it safer to go to school	172 (33%)
There should be better enforcement of existing restrictions	114 (21%)
The scheme is unnecessary	79 (15%)
The scheme will create unsafe surrounding roads	78 (14.55%)
The scheme will impact access for delivery vehicles and traders	74 (14%)
The scheme will cause additional pollution on side roads	69 (13%)

Extend scheme boundary	68 (12.8%)
Consider one way, no entry etc. as an alternative to proposal	60 (11%)

4.9 Whilst the above table lists out the top 10 response themes officers have focused on the top 4 most common re-occurring themes and provided a response to each one which is as follows:

4.10 Officer response to **Theme 1 – The scheme will cause displacement of traffic and congestion:** the schemes recommended for implementation will be installed under an Experimental Traffic Management (ETMO), this allows both the public and the council to realise and monitor the impacts of the schemes while they are in operation on the public highway. Some of other key benefits of installing schemes in this way are:

- Allows for an extended objection period. (6 months)
- Allows the council to make amendments to better the scheme in response to objections received during the 6-month statutory objection period.
- Allows the council to assess and monitor the impacts of a scheme on for example air quality and traffic.
- Allows decision makers to review the objections received and monitoring data during the experimental period before reaching a decision on retaining, replacing, or removing the experimental scheme before the end of the 18-month period.

4.11 The council will be installing traffic and air pollution equipment at all sites to monitor the impacts on traffic and pollution and report back on its findings. It is accepted that in the short term there may be a slight increase in displaced traffic to other roads as motorists get used to the new schemes and alter their choice of travel. School Streets do not simply shift traffic from one place to another. Instead, we see an overall reduction in the numbers of motor vehicles on roads, as people reduce the number of car journeys they make, take different routes, and replace some vehicle journeys with walking or cycling. This is known as ‘traffic evaporation’ and has been observed in numerous similar schemes around London. A study (carried out by Edinburgh Napier University and Sustrans) based on existing school streets implemented by various administrative authorities across the UK, showed that there is not significant displacement of parking near to school streets. The 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.

4.12 In addition to carrying out our own monitoring through on street equipment, the council will engage directly with the schools during the experimental period to determine if the benefits of the scheme have been felt by the school, its staff, and pupils. Schools are requested to carry out what are known as ‘hands up surveys’ asking pupils how they travel to and from school. There are compared with previous similar surveys carried out before the introduction of a scheme to determine if the school street has resulted in a change in the travel behaviour. As explained section 1 of this report installing schemes under a ETMO allows for

further engagement and provides another opportunity for those impacted by the scheme to voice their views through the statutory consultation mechanism. 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.

- 4.13 Officers acknowledge that several respondents have said that the scheme may cause dangerous driving on roads adjacent to the schemes. However, officers are of the view that a large concentration of motor traffic outside or close to the school gates where there is likely to be a high density of children is more dangerous heightening the risk of collision. Motor traffic spread over a large area or multiple streets is viewed to be better than traffic concentrated in one area or road causing congestion and air pollution. As explained above, during the first few weeks of a new traffic scheme being installed often short-lived disruption is observed overtime as motorists become accustomed to the scheme, they often find alternative routes or move to using more sustainable forms of travel. If a significant number of school related commuter traffic shifts from using motor vehicles to sustainable modes of travel the risk of collisions can be reduced further.
- 4.14 Officer response to **Theme 2 – The scheme will make it difficult for working parents, visitors, and residents:** The council has in place a suite of permits and exemptions to provide access for various users as detailed in the proposals section of this report. In certain circumstances, the exemptions can be extended to deliveries and visitors.
- 4.15 The council appreciates that the scheme may cause inconvenience to some working parents that drop off their children as well as reach their place of work in a short space of time during peak periods, however the safety of children who do walk and cycle to school is of a greater priority. 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 scheme are only operational for short periods during weekdays and do not operate during school or public holidays. Residents are encouraged to arrange deliveries and visits outside of the operational hours. However, the council's Highways & Parking Service endeavour to accommodate a special access request on a case-by-case basis.
- 4.16 Officer response to **Theme 3 – the scheme will make it safer for children and the school:** Officers acknowledge this, and this is one of the key objectives of the scheme, it is encouraging to note that many respondents agree that the proposal will make it safer.
- Officer response to **Theme 4 - better enforcement of existing parking restrictions is needed:** this comment was found to be in two contexts both of which have been combined to create this theme. The context was:

- 1) Those that agreed with the scheme but also said that the council needs to better enforce other parking restrictions already in place.
- 2) Those that disagreed with the scheme and suggested that the council should better enforce existing parking restrictions already in place rather than coming up with new proposals.

Whilst the council would like to carry out more enforcement, limited resource means enforcement of all restrictions especially during peak periods across the borough can be challenging. The available resource is deployed in areas where there is a significant parking compliance concern or related road safety issue. School Street schemes will not take away precious resource as they are self-enforcing through automated cameras. As part of scheme installation officers will refresh line marking and introduce new parking restrictions where needed.

5. OFFICER CONCLUSION

- 5.1 The School Street schemes were proposed in response to calls by the local schools and residents to address concerns around poor air quality, traffic congestion and road safety on the named roads during school pick up/ drop off times. The council is leading on addressing the impacts of climate change, road safety and congestion outside schools by the introduction of series of school streets, with the first launched in 2017 and more recently an additional set of ten installed in April 2022. The council acknowledges that during the first few months of the school streets becoming operational there is likely to be some local disruption to normal travel patterns and behaviour, however studies show that as the scheme has an opportunity to bed in often the early disruption dissipates and a focus turns into the benefits of such schemes. For schemes where concerns around access and enforcement of existing restrictions have been raised, officers will remind residents of the suite of exemptions/permits available to them. For enforcement of existing restrictions officers will request this and refresh line markings to aid better parking practice.

6. OPTIONS CONSIDERED AND REJECTED

- 6.1 Option 1 not proceeding with the implementation of the 9 schemes under ETMO: officers are of the view that this would be a missed opportunity to relieve children, parents and residents from obstruction, road safety, air quality and inactivity problems resulting from traffic and parking. As explained previously installing the schemes under ETMOs will allow both the public and the council to appreciate and assess the true impacts of the schemes, providing those affected with a further opportunity to express their opinions views through statute. Officers have the option open to them to amend the schemes during the 18-month experimental period to better them or address any objections that come forward at this second stage.
- 6.2 Option 2 better enforcement in place of implementing school street schemes: increasing the conventional presence of Civil Enforcement Officers (CEOs) at peak times, as an alternative to the School Street, are demonstrated to be

insufficient in resolving the chaotic and, at times, hostile traffic conditions, which occurs in the space where children and cars co-exist. CEOs do not have powers to direct or enforce traffic with regards to resolving congestion and discouraging car use. It is practically impossible to provide a daily presence at each the 130 schools in the borough. The Council, and the London Mayor's office, are already working with schools and parents in other ways to encourage less car use; but nothing has yet emerged as equally effective as the combination School Street, in helping to reverse the trend of the many more children being driven to school.

7. REASONS FOR RECOMMENDATION

- 7.1 For the reasons set out in Section 2, 3 & 4 of this report officers conclude that 9 new Healthy School Streets are implemented under ETMOs with amendments made to 1 out of the 9 schemes. The new ETMOs are proposed to be made effective from January 2023 after the Christmas and New Year holidays, the 6 months consultation period will commence from said date.
- 7.2 The Council has reviewed and tried various options to reduce parking stress and improve safety around schools. The School Street schemes introduced to date have been successful as described in this report, so the recommendation is to introduce more such schemes where appropriate.
- 7.3 The schemes meet and support several of Croydon's transport objectives and priorities along with those within the Mayor of London's Transport Strategy. These are the reasons why officers recommend their implementation so that their effectiveness can be fully assessed.
- 7.4 Officers are of the view that information gained through the public's representations is highly valuable and will assist in officers improving the schemes especially in relation to enforcement.

8. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

8.1 Revenue and Capital consequences of report recommendations

The introduction of the proposed Experimental Traffic Management Orders (ETMOs) including officer time and on-street changes is estimated to be £230,000. In addition, the cost of collecting monitoring data (both traffic and air quality data) is estimated to be £60,000.

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). The surplus income generated from PCNs is ringfenced for transport initiatives and the Freedom Pass.

The delivery of the 9 schemes recommended to be taken forward is consistent with the budget approved by the council for 2022/23 financial year.

8.2 The effect of the decision

The making of the ETMOs and the implementation of the schemes and associated monitoring equipment to support them will incur expenditure as set out above, with budget available from the existing operational capital budgets for Parking (CAP39).

8.3 Risks

Revenue from parking charges (including ANPR enforcement) is a key source of income for the council. If the outcome of this report was to not proceed with the recommendation, this would result in a reduction of the projected income from 2022/23 onwards. Also, it is recognised that School Street compliance will change over time, and revenue is continually reducing. However, the schemes remain self-financing and bring important value through their road safety and air quality objectives.

8.4 Options

Substituting the proposed 9 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. is financially less efficient.

Approved by: Alan Layton, Interim Head of Service, on behalf of the Director of Resources & S151 Officer.

9. LEGAL CONSIDERATIONS

9.1 The Head of Litigation and Corporate Law and Deputy Monitoring Officer comments on behalf of the Director of Legal Services and Monitoring Officer as follows.

9.2 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 regulations 22 and 23 and Schedule 5 to the LATOPR 1996. . 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.

9.3 By virtue of section 122 of the Road Traffic Regulation Act 1984, the Council must exercise its powers under that Act (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.

9.4 High Court authority confirms that the Council must have proper regard to the matters set out at s122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.

9.5 Where ANPR is used, the Council must ensure it adheres to the Surveillance Commissioner Guidance and Information Commissioner Guidance, where appropriate. The council's Parking Enforcement Team has carried out separate Data Protection Impact Assessments (DPIAs) for each camera and site.

(Approved by Mark Turnbull, Interim Corporate Solicitor on behalf of the Director of Legal Services and Monitoring Officer)

10. HUMAN RESOURCES IMPACT

10.1 There are no immediate HR impact issues in this report. If any should arise these will be managed under the Council's Policies and Procedures. Implementation of the recommendations should ensure continued transport investment funding to the Council from TfL/central government.
(Approved by: Dean Shoesmith, Chief People Officer)

11. EQUALITIES IMPACT

11.1 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.

11.2 An Equalities Impact Assessment (EqIA) has been completed for the introduction of the new ETMOs for the School Streets, and is included in Appendix D.

11.3 The School Streets operational concept is unchanged since they were first introduced 2017. This project is intended to restrict access for motor traffic

- except resident permit holders, cyclists, emergency services and certain other groups such as carers and those with disabilities. The impact will benefit the more vulnerable – such as pregnant mothers, children, those with debilitating respiratory illnesses with secondary health benefits for the wider communities:
- 11.4 Feedback from the representations received as part of the statutory objection periods on the previous and ongoing ETMOs has not raised any new or emerging equalities issues. The implementing team has considerable practical experience of operating School Streets since 2017 and will bring forward during this experimental phase lessons learned in its operation. The intent being to inform any final decision on continuity.
- 11.5 The EqIA has identified some negative impact in regards to Age, Disability & Pregnancy & Maternity however, the team has in place mitigation to address these including making provision for schools to request temporary access if necessary.
- 11.6 Should the proposed experiment prove successful a full and extensive EqIA review will be carried out based around the project plan as part of any long term changes to the operational methods or in response to any feedback or concern.

(Approved by: Denise McCausland, Equalities Manager)

12. ENVIRONMENTAL IMPACT

- 12.1 The School Street schemes are expected to reduce car use, which in turn will contribute to reducing congestion and air pollution in a wider area. The zone signs are designed to meet the Department for Transport specification and will naturally fit the street scheme. The addition of signs and cameras within the public realm is compensated for by reducing the visual impact of congested traffic and parking.

13. CRIME AND DISORDER REDUCTION IMPACT

- 13.1 Hostile behaviours are presently daily occurrences experienced by driving parents other road users, school staff residents and parking enforcement. This disorderly behaviours can be intimidating and sets a bad example to children. The School Street schemes can significantly reduce and disperse such disorder away from the school entrance where a concentration of children exists.

14. DATA PROTECTION IMPLICATIONS

- 14.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

YES

The need for a DPIA has been identified as the project will involve the receiving of statutory objections and representations and using this data

collected during the Objection Period *will* be used to make an informed decision on the future of the schemes

14.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

YES

Attached copy in Appendix E of this report.

(Approved by: Olawale Adebambo on behalf of the Director of Legal Services and Monitoring Officer)

CONTACT OFFICER: Jayne Rusbatch – Head of Highways and Parking jayne.rusbatch@croydon.gov.uk & Tabrez Hussain – Principal Engineer, Highway Improvements Team

APPENDICES TO THIS REPORT:

1. Appendix A: Design drawings of all proposed 11 Healthy School Streets as consulted upon
2. Appendix B: Consultation leaflets for all proposed 11 Healthy School Street schemes
3. Appendix C: Design drawings of the proposed amendments to 1 out of the 9 schemes recommended to be taken forward for implementation
4. Appendix D: Equalities Impact Assessment
5. Appendix E: Data Protection Impact Assessment (DPIA)
6. Appendix F: Consultation analysis

BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972

1. <https://www.croydon.gov.uk/transportandstreets/policies>
2. <https://www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities/traffic-management-act-2004-network-management-in-response-to-covid-19>
3. <https://tfl.gov.uk/travel-information/improvements-and-projects/streetspace-for-london>
4. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716075/vehicle-licensing-statistics-2017-revised.pdf
5. <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/birthsummarytablesenglandandwales/20>

6. <https://www.sciencedirect.com/science/article/pii/S0048969701007586>
7. <https://www.mumsforlungs.org/resources>
8. <https://democracy.croydon.gov.uk/documents/s17358/Equality%20Analysis%20V3.pdf>
9. Healthy School Streets – Proposed New Experimental Traffic Management Orders at 10 locations; Traffic Management Advisory Committee 21 March 2022
<https://democracy.croydon.gov.uk/documents/s36942/Report%20for%20new%20ETMOs.pdf>.
10. School Streets; Traffic Management Advisory Committee 8 July 2020 [https://democracy.croydon.gov.uk/documents/g2262/Public reports pack 08th-Jul-2020 18.30 Traffic Management Advisory Committee.pdf?T=10](https://democracy.croydon.gov.uk/documents/g2262/Public%20reports%20pack%2008th-Jul-2020%2018.30%20Traffic%20Management%20Advisory%20Committee.pdf?T=10)