

LONDON BOROUGH OF CROYDON

| | | |
|---------------------------------------|---|--|
| REPORT: | CABINET | |
| DATE OF DECISION | 27 SEPTEMBER 2023 | |
| REPORT TITLE: | Report on 10 Experimental Healthy School Streets Schemes (Group 2) | |
| CORPORATE DIRECTOR / DIRECTOR: | Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration & Economic Recovery | |
| LEAD OFFICER: | Jayne Rusbatch, Head of Highways and Transport | |
| LEAD MEMBER: | COUNCILLOR SCOTT ROCHE, CABINET MEMBER FOR STREETS & ENVIRONMENT | |
| KEY DECISION? | Yes | Key Decision reference: 1923EM REASON: Decision significantly impacts on communities living or working in an area comprising two or more Wards |
| CONTAINS EXEMPT INFORMATION? | No | |
| WARDS AFFECTED: | MULTIPLE (Bensham Manor, Broad Green, Crystal Palace & Upper Norwood, Norbury Park, Old Coulsdon, Purley Oaks & Riddlesdown, Sanderstead, South Croydon, Woodside) | |

1. SUMMARY OF REPORT

This report provides the Executive Mayor of Croydon and Cabinet with recommendations for the future of the 10 Experimental Traffic Orders (ETOs) covering 10 Healthy School Streets (Group 2) that were implemented on April 25, 2022, for a period of 18 months which included a 6-month statutory objection period, from 25 April 2022 to 25 October 2023.

This group of Healthy School Streets were originally introduced in 2020, following an informal consultation exercise, and to provide context, the results of this exercise are included in this report. Following this informal exercise, this group of schemes was introduced as an ETO in October 2020, and due to the impacts of Covid and lack of supporting data were reintroduced under new ETOs in April 2022.

During the first 6 months of the current experimental order, 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.

The table below lists the 10 Healthy School Street schemes:

| Ref | School | Affected Road(s) | Ward |
|--------|--|---------------------------------|--------------------------------|
| HSS 1 | Ecclesbourne Primary School | Atlee Close | Bensham Manor |
| HSS 2 | St Thomas Becket Catholic Primary School | Dickenson's Lane | Woodside |
| HSS 3 | Harris Primary Academy Haling Park | Haling Road | South Croydon |
| HSS 4 | Keston Primary School | Keston Avenue | Old Coulsdon |
| HSS 5 | Downsview Primary School | Marston Way | Norbury Park |
| HSS 6 | Christ Church CofE Primary School | Montpelier Road | Purley Oaks & Riddlesdown |
| HSS 7 | Oasis Academy Ryelands | Sandown Road & Oakley Road | Woodside |
| HSS 8 | Ridgeway Primary School | Southcote Road | Sanderstead |
| HSS 9 | Harris Primary Academy Croydon | Thomson Crescent & Chapman Road | Broad Green |
| HSS 10 | St Joseph's Catholic Junior School | Woodend | Crystal Palace & Upper Norwood |

This report together with the supporting appendices presents the outcome of the engagement and statutory consultation for the 10 experimental orders in the Healthy School Streets schemes.

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, the Executive Mayor in Cabinet, is recommended:

- 2.1 To make the following 9 experimental traffic orders, which form the healthy school streets schemes (No. 1-3 and 5-10) detailed within this report, permanent:

| School | Affected Road | Section | ETMO Cited As | Ref |
|---|----------------------------------|--|--|---------|
| Ecclesbourne Primary School | Atlee Close | Entire length of | The Croydon (Traffic Movement) (No.2) Experimental Order 2022 | 2022/19 |
| Harris Primary Academy Croydon | Thompson Crescent and Chapman Rd | Chapman Road Between Kingsley Road and Fairmead Road, Thomson Crescent Between Kingsley Road and Euston Road | The Croydon (Traffic Movement) (No.3) Experimental Order 2022 | 2022/20 |
| St Thomas Beckett Catholic Primary School | Dickenson's Lane | Entire length of road | The Croydon (Traffic Movement) (No.4) Experimental Order 2022 | 2022/21 |
| Harris Primary Academy Haling Park | Haling Rd | Between the north to south arm of Haling Road and Selsdon Road | The Croydon (Traffic Movement) (No.5) Experimental Order 2022 | 2022/22 |
| Downsview Primary School | Marston Way | Entire length of road | The Croydon (Traffic Movement) (No.7) Experimental Order 2022 | 2022/24 |
| Christ Church CofE Primary School | Montpellier Rd | Between Brighton Road and the common boundary of Nos. 84 and 86 Montpelier Road | The Croydon (Traffic Movement) (No.8) Experimental Order 2022 | 2022/25 |
| Oasis Academy Ryelands | Sandown and Oakley | Oakley Road entire length of, Sandown entire length of | The Croydon (Traffic Movement) (No.9) Experimental Order 2022 | 2022/26 |
| Ridgeway Primary School | Southcote Rd | southcote Rd: between The Ridgeway and the westernmost junction with Ellenbridge Way | The Croydon (Traffic Movement) (No.10) Experimental Order 2022 | 2022/27 |
| St Joseph 's Catholic Primary Junior School | Woodend | Entire length of road | The Croydon (Traffic Movement) (No.11) Experimental Order 2022 | 2022/28 |

- 2.2 To withdraw The Croydon (Traffic Movement) (No.6) Experimental Order 2022 effective as of 21 October 2023 in respect of the Keston Healthy School Street in Keston Avenue 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 9 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 9 of the 10 Experimental Traffic Orders comprising 9 Healthy School Streets are implemented permanently and 1 is withdrawn.
- 3.2 The 9 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 1) the Mayor of Croydon Business Plan and 2) The Mayor of London Transport Strategy at a local level. This is aimed at addressing the challenges and opportunities coming out of the pandemic around climate change, congestion, road safety issues and poor air quality.
- 4.2 The overarching policy objectives for School Streets and their source references are documented in the Parking Policy 2019-2022. In summary:
- 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.
 - The Director of Public Health's annual report 2017 called for action on air pollution and inactivity. It identifies that Croydon has the highest rate of hospital admissions for childhood (0-9 years) asthma and the third highest number of asthma deaths in London. 205 premature deaths in Croydon are linked to air pollution. There are further health concerns associated with 40% of children and 60% of adults in Croydon being overweight.
 - The level of Croydon residents who regularly travel by active modes (walking and cycling) is lower than in each of our neighbouring 6 boroughs. Only 26% of

Croydon residents undertake the minimum 20 minutes of active travel each day needed to stay healthy.

- 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.

4.3 Several school streets have reached saturation point at the start and end of school days – meaning that in the most severe places there is 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 conducted 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.

4.4 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.

4.7 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 2020

4.8 To inform the rollout of the ongoing school street programme, in 2020 an informal consultation exercise was undertaken, which is set out below.

- a) 2679 leaflets were posted to various addresses for the batch of 10 schools as detailed in this report between 9 January 2020 and 5 February 2020 within a 300 metre distance from each school.
- b) In brief 457 letters were received by the council giving a response rate of 17%. The analysis identified that within the zone of influence of the schools, that is from the specific school streets, 87% of all those who responded were supportive and 13% opposed.
- c) Outside of the zone (i.e. beyond the school streets locations) only 35% were supportive and 65% against due to potential traffic displacement. On the basis of the outcome of this informal consultation, a decision was taken to put in place 10 experimental traffic

orders in order to test whether or not the orders could deliver the desired outcomes for the 10 healthy school street schemes.

Specific to Keston School the informal consultation indicated the following:

- d) Within the proposed scheme area: 75% response rate with 100% in favour
 Outside of the proposed scheme area: 25% response rate and 72% strongly opposed.
 Those who strongly opposed the scheme were from Court Avenue where there is a perceived traffic problem without the proposed scheme, and that introduction of a scheme would add to their issues of rat running.

The table below outlines details of the informal consultation outcome carried out in 2020 per scheme.

| All 11 school proposals | | | Opinions | | |
|-------------------------|---------|------------|------------|------------|---------|
| Distance | Letters | Responses | No | Yes | Unsure |
| Inside Zone | 616 | 160 26% | 21 13% | 139 87% | 0 0% |
| Less than 100m outside | 702 | 94 13% | 57 61% | 35 37% | 2 2% |
| More than 100m outside | 1361 | 203 15% | 130 64% | 69 34% | 4 2% |
| Total | 2679 | 457 17% | 208 46% | 243 53% | 6 1% |

| Christ Church CofE Primary | | | Opinions | | | Summary of responses |
|----------------------------|---------|-----------|----------|-----------|---------|--|
| Distance | Letters | Responses | No | Yes | Unsure | |
| Inside Zone | 68 | 15 22% | 2 13% | 13 87% | 0 0% | Respondents from addresses both inside and outside the zone are in favour of a School Street. Low response rate from addresses outside the suggested zone. Some concern about a conflict with the temporary one-way system (due to end June 2020). |
| Less than 100m outside | 85 | 6 7% | 2 33% | 4 67% | 0 0% | |
| More than 100m outside | 142 | 8 6% | 4 50% | 4 50% | 0 0% | |
| Total | 295 | 29 10% | 8 28% | 21 72% | 0 0% | |

| Downsview Primary School, Marston Way | | | Opinions | | | Summary of responses |
|---------------------------------------|---------|-----------|-----------|-----------|---------|--|
| Distance | Letters | Responses | No | Yes | Unsure | |
| Inside Zone | 126 | 20 16% | 5 25% | 15 75% | 0 0% | Relatively low response rate, with just 5 respondents from outside the zone (vs 20 from inside). There are strong expressions of support from inside the suggested zone. There are equally strong opposition from outside the zone, although the statistically lower significance should be noted. |
| Less than 100m outside | 26 | 4 15% | 3 75% | 1 25% | 0 0% | |
| More than 100m outside | 17 | 1 6% | 1 100% | 0 0% | 0 0% | |
| Total | 169 | 25 15% | 9 36% | 16 64% | 0 0% | |

| Ecclesbourne Primary School | | | Opinions | | | Summary of responses |
|-----------------------------|---------|-----------|----------|-----------|---------|--|
| Distance | Letters | Responses | No | Yes | Unsure | |
| Inside Zone | 52 | 13 25% | 4 31% | 9 69% | 0 0% | Respondents from addresses both inside and outside the zone are significantly in favour of a School Street; but with just 7 respondents from the outside the suggested zone. |
| Less than 100m outside | 80 | 2 3% | 1 50% | 1 50% | 0 0% | |
| More than 100m outside | 132 | 5 4% | 1 20% | 4 80% | 0 0% | |
| Total | 264 | 20 8% | 6 30% | 14 70% | 0 0% | |

| Harris Academy Purley Way | | | Opinions | | | Summary of responses |
|---------------------------|---------|-----------|----------|-----------|---------|--|
| Distance | Letters | Responses | No | Yes | Unsure | |
| Inside Zone | 64 | 8 13% | 0 0% | 8 100% | 0 0% | Low response rate overall. Respondents refer to wider parking issues in the Propeller Crescent off-street parking place. |
| Less than 100m outside | 14 | 0 0% | 0 0% | 0 0% | 0 0% | |
| More than 100m outside | 54 | 3 6% | 1 33% | 2 67% | 0 0% | |
| Total | 132 | 11 8% | 1 9% | 10 91% | 0 0% | |

| Harris Primary Academy Hailing Park | | | Opinions | | | Summary of responses |
|-------------------------------------|---------|-----------|----------|-----------|----------|--|
| Distance | Letters | Responses | No | Yes | Unsure | |
| Inside Zone | 27 | 14 52% | 1 7% | 13 93% | 0 0% | High response rate and strongly in favour from within the proposed zone. Majority of responses outside the proposed zone are in favour; but with a relatively low response rate. |
| Less than 100m outside | 98 | 9 9% | 3 33% | 5 56% | 1 11% | |
| More than 100m outside | 27 | 1 4% | 0 0% | 1 100% | 0 0% | |
| Total | 152 | 24 16% | 4 17% | 19 79% | 1 4% | |

| Keston Primary School | | | Opinions | | | Summary of responses |
|------------------------|---------|-----------|-----------|-----------|---------|---|
| Distance | Letters | Responses | No | Yes | Unsure | |
| Inside Zone | 12 | 9 75% | 0 0% | 9 100% | 0 0% | Very high response rate and 100% in favour from within the suggested zone. Relatively high response rate from outside the zone and strongly against. Residents in Court Avenue accounts for half the responses from outside the zone and they raise the concern that traffic and parking conditions are already intolerable. 14% of Court Avenue respondents said they would support the scheme if it is extended to their road. This is discussed below. |
| Less than 100m outside | 90 | 25 28% | 21 84% | 3 12% | 1 4% | |
| More than 100m outside | 234 | 56 24% | 37 66% | 17 30% | 2 4% | |
| Total | 336 | 90 27% | 58 64% | 29 32% | 3 3% | |

| Kingsley Primary Academy | | | Opinions | | | Summary of responses |
|--------------------------|---------|-----------|-----------|-----------|---------|---|
| Distance | Letters | Responses | No | Yes | Unsure | |
| Inside Zone | 55 | 6 11% | 0 0% | 6 100% | 0 0% | Overall low response rate. Respondents from outside the suggested zone complain about commuter parking from the nearby industrial Factory Lane and they are concerned about additional displacement from a School Street. 10% of respondents (all living within 300m distance) commented that they must drive their child to Kingsley Primary school for road safety reasons. |
| Less than 100m outside | 103 | 7 7% | 5 71% | 2 29% | 0 0% | |
| More than 100m outside | 196 | 22 11% | 15 68% | 7 32% | 0 0% | |
| Total | 354 | 35 10% | 20 57% | 15 43% | 0 0% | |

| Oasis Academy Ryelands | | | Opinions | | | Summary of responses |
|------------------------|---------|-----------|-----------|-----------|---------|--|
| Distance | Letters | Responses | No | Yes | Unsure | |
| Inside Zone | 134 | 40 30% | 7 18% | 33 83% | 0 0% | Highly favourable response rate from within the suggested zone. Neighbouring Watcombe Road and Ferndale Road have 14% high response rate and are 76% against a scheme. Residents in the 2 roads complain that traffic and parking conditions are already intolerable and they are concerned about displacement. 12% of Ferndale Road respondents said they would support the scheme if it is extended to their road. 7% of respondents have stated the area also needs controlled parking. |
| Less than 100m outside | 79 | 3 4% | 2 67% | 1 33% | 0 0% | |
| More than 100m outside | 193 | 26 13% | 20 77% | 6 23% | 0 0% | |
| Total | 406 | 69 17% | 29 42% | 40 58% | 0 0% | |

| Ridgeway Primary School | | | Opinions | | | Summary of responses |
|-------------------------|---------|-----------|-----------|-----------|---------|---|
| Distance | Letters | Responses | No | Yes | Unsure | |
| Inside Zone | 13 | 11 85% | 1 9% | 10 91% | 0 0% | Very high response rate and 91% in favour from within the suggested zone. High response rate from outside the zone and overall against. Respondents from Ellenbridge Way and Elmfield Way in particular are concerned about displacement and several respondents express a dislike for traffic restrictions in general. |
| Less than 100m outside | 27 | 20 74% | 12 60% | 8 40% | 0 0% | |
| More than 100m outside | 158 | 56 35% | 36 64% | 18 32% | 2 4% | |
| Total | 198 | 87 44% | 49 56% | 36 41% | 2 2% | |

| St Joseph's Catholic Junior School | | | Opinions | | | Summary of responses |
|------------------------------------|---------|-----------|-----------|------------|---------|--|
| Distance | Letters | Responses | No | Yes | Unsure | |
| Inside Zone | 26 | 11 42% | 0 0% | 11 100% | 0 0% | High favourable response rate from within the suggested zone. Mixed response from outside the zone. Bradley Road has a history of rat running and its respondents say the pre-existing one-way system is complicated enough. 18% of opponents in Bradley Road say they would support the School Street if it was extended to Bradley Road. |
| Less than 100m outside | 53 | 15 28% | 7 47% | 8 53% | 0 0% | |
| More than 100m outside | 153 | 18 12% | 10 56% | 8 44% | 0 0% | |
| Total | 232 | 44 19% | 17 39% | 27 61% | 0 0% | |

| St Thomas Becket Catholic Primary | | | Opinions | | | Summary of responses |
|-----------------------------------|---------|-----------|----------|-----------|---------|---|
| Distance | Letters | Responses | No | Yes | Unsure | |
| Inside Zone | 39 | 13 33% | 1 8% | 12 92% | 0 0% | High favourable response rate from within the suggested zone. Low response rate overall opposed from outside the zone. Respondents in Birchanger Road are concerned about pre-existing school time problems and displacement. |
| Less than 100m outside | 47 | 3 6% | 1 33% | 2 67% | 0 0% | |
| More than 100m outside | 55 | 7 13% | 5 71% | 2 29% | 0 0% | |
| Total | 141 | 23 16% | 7 30% | 16 70% | 0 0% | |

4.9 The schemes were originally introduced through a single Experimental Traffic Management Order published on 1 September 2020 that expired on 28 February 2022. The council was of view that upon the expiry of the first ETO in February 2022 it was not possible for the council to take a decision on the future of the mentioned 10 schemes for the following key reasons:

- The 6-month statutory consultation period coincided with the closure of schools during periods of COVID lockdown from 13 December 2020 to 8 March 2021.
- The schemes did not coincide with "business as usual" traffic conditions due to the ongoing pandemic and resulting lockdowns during the experimental period.
- Enforcement of the schemes was sporadically suspended.
- Infrastructure delays resulted in some of the school street signage not being implemented in time for the ETO go live date without which the ETO is rendered invalid.

4.10 For the above reasons the council took the decision on 21 March 2022 to re-run the 10 experiments under new ETOs from April 2022 as the council was of the view that those affected by the experiments may not have had sufficient opportunity to experience their true effects. Further information in relation to the decision made and background can be found by viewing the committee papers [here](#).

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 walk more in the 10 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 10 separate school pedestrian zones into the roads as listed in paragraph 2.1, 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 8am and 9.30am and between 2.00pm and 4pm, Monday to Friday during school term time. An exemption applies for those holding a valid permit issued by the Council for that pedestrian zone including blue badge holders.
- 5.2 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 Management 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.
- 5.3 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;
- 5.4 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, and Vivacity Artificial Intelligence (AI) traffic monitors to determine changes in traffic on surrounding roads. 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 reduction in road risk) with the exception of Court Avenue. Keston Primary has a secondary school entrance on Court Avenue, where we have seen recorded traffic volumes increase in the AM Peak period. Whilst in other locations school and local traffic could dissipate across the wider local area, for Court Avenue the surrounding road network is such that it forms an alternative route between Coulsdon Road and Keston Avenue, meaning that traffic displaced from the restricted section of Keston Avenue is concentrated in Court Avenue, thereby increasing road danger risk.

It is expected that traffic volumes within the immediate local area to the 9 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 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 collected during the last week of July 2023 (refer to Appendix C), an initial review shows that levels are as would be expected at the 15 monitoring sites, with data seeming to be reliable and accurate. Under the Environment Act 2021 the government has set a target to reduce Particulate Matter (PM2.5) to an annual mean concentration target for PM2.5 of 10 µg/m³ across England by 2040. Recorded pollution levels in the school street monitoring locations are initially indicated to be well within this UK objective for Particulate Matter (PM2.5). Given the complexities of air quality monitoring, further monitoring over a longer period (ideally 12 months) will be undertaken before any conclusive and extensive opinion can be given. However, given the increase in traffic volumes in Court Avenue which are not dissipated across the

network in the same way as for the other 9 school street schemes, there is potential for there to be a detrimental impact on air quality, and this further supports the removal of the school street scheme for Keston School.

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 (0800 to 0930) and pick up period (1400 to 1600) 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, blue badge holders 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.

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.

- 5.5 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 9 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 9 schemes permanent.

- 6.1 Officers are of the view that not making the 9 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 9 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 HSS4 Keston Avenue

6.3 In respect of Keston Avenue, there was a significant number of objections all relating to traffic displacement indicating a huge dissatisfaction with the scheme under experimental traffic order.

6.4 The analysis of the objections detailed within the consultation section has indicated the following:

- Of the 100+ residences in Court Ave 53 objections were received from both emails and Get Involved survey
- Keston School (HSS4) accounts for 39% of all objections received to the statutory consultation
- Keston School (HSS4) accounts for 60% of all objections received in the Traffic Displacement theme or category

It is worth noting that the 2020 informal consultation process indicated 72% of those who responded (from outside of the scheme area, i.e. Court Avenue) were strongly opposed to the proposal to introduce a Healthy School Street in Keston Avenue. Included in the report is also a testimonial from Keston School, indicating the Head Teacher's concerns about the scheme.

6.5 Having regard to the historical outcome of the 2020 informal consultation, the current overwhelming level and nature of objections received from the statutory consultation and the evidence of displacement of traffic into Court Avenue as a result of implementation of the Experimental Order at this site as illustrated in Appendix B, it is recommended that this scheme and its associated experimental order should be 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, and the re-running of the ETOs supported this approach.

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 25 April 2022 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 councils Healthy School Street programme
- A dedicated Healthy School Streets email address was set up per scheme.

7.7 The summary of findings of the 6-month statutory consultation for all 10 experimental schemes is listed below.

- In total 5,635 letters were delivered across all 10 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 145 responses were received across all 10 schemes; 116 responses were received from the Get Involved survey and 29 responses received from specific scheme email addresses which represents a very low response rate of 2.5%. 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, this is because of 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 | 112 | 4 |

| | | |
|---------------------|-----|---|
| HSS email addresses | 24 | 5 |
| Total | 136 | 9 |

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

| HSS | School | School Street | Total number of responses received | Total number of support received | Total number of objections received |
|-----|---|---------------------------------|------------------------------------|----------------------------------|-------------------------------------|
| 1 | Ecclesbourne Primary school CR7 7FA | Atlee St | 13 | 0 | 13 |
| 2 | St Thomas Becket Catholic Primary School SE25 5BN | Dickenson's Lane | 5 | 0 | 5 |
| 3 | Harris Primary Academy school CR2 6HS | Haling Rd | 14 | 3 | 11 |
| 4 | Keston Primary School CR5 1HP | Keston Ave | 53 | 1 | 52 |
| 5 | Downsview Primary School SE19 3XE | Marston Way | 8 | 1 | 7 |
| 6 | Christchurch CofE Primary School CR8 2BS | Montpelier Rd | 14 | 1 | 13 |
| 7 | Oasis Academy Ryelands SE254XG | Sandown Rd & Oakley Rd | 12 | 3 | 9 |
| 8 | Ridgeway Primary School CR2 0EQ | Southcote Rd | 9 | 0 | 9 |
| 9 | Harris Primary Academy Croydon CR03JT | Thomson Crescent and Chapman Rd | 8 | 0 | 8 |
| 10 | St Joseph's Catholic Junior School | Woodend | 9 | 0 | 9 |
| | | | 145 | 9 | 136 |

- The reason for the low number of 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 a traffic management order. In general, when a statutory process is evoked, the council does not expect to receive support. The council seeks level of support / opposition for any scheme through an informal consultation process which then decides whether to proceed to a statutory process or not. A few respondents have chosen to send their support to the statutory process. Hence the very low level of support in comparison to the informal consultation carried out in 2020 when the response rate was 17%
- HSS 4 Keston Avenue** received a high proportion of objections totalling 52 (37 objections lodged on the online Get Involved survey and 15 emails received) out of

145 representing 38.8% of all objections received across the 10 Healthy School Street schemes. Nearly all the objections received were from Court Avenue, which is a link from Keston Avenue to Coulsdon Road. The objections' theme was mainly traffic displacement related.

7.8 An analysis of responses received is outlined below. Objections received were categorised into 4 themes:

- 1) traffic displacement,
- 2) Access problems,
- 3) Money making scheme and
- 4) other (inadequate signage, restrictions too long, against in principle).

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

7.10 Analysis of objections:

7.10.1 Traffic displacement: This accounts for 50% of all objections received. The objections received 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 9 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.

As a result of the outcome of the statutory consultation, objectors raised concerns in certain streets about vehicles using neighbouring streets which are left idling, parents parking on yellow lines and also blocking driveways. Due to limited resources within the Parking enforcement team, 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. 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.

7.10.2 Access issues during the hours of operation which accounts for 19% of all objections received.

The majority of objections under this category relate to:

- a) access for family and friends visiting,
- b) access for tradesperson/ builders carrying out repairs,
- c) having grocery deliveries,
- d) access for carers for their elderly parents or for the elderly in general,

e) organising taxis for hospital appointments, etc.

The council has in place a suite of permits and exemptions to provide access for various users. The Council has published information online which includes how the permit system works and eligibility for access during the operational hours. The information is very comprehensive and should assist residents in meeting some of their essential needs. The scheme also caters for family, carers, builders/ tradespersons visiting premises during the hours of operation through the issuance of temporary permits free of charge. There is also sufficient flexibility within the permit system for the council to 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. The delivery of groceries and other types of deliveries such as online shopping can be planned for outside of the operational hours. In general deliveries of parcels by Amazon and other couriers can be redirected to specific shops or shopping areas where lockers exist for such arrangements. The web site information detailing the permit system can be accessed [here](#).

7.10.3 **“This is a money-making scheme” accounting for 7% of all objections received:**

The council does not profit from traffic filter fines. Any revenue generated from any camera-controlled restrictions anywhere in the borough is re-invested into improving parking, highways and road safety in the borough. This is in line with current legislation governing income generation from enforcement of parking and traffic regulations.

7.10.4 **Other categories such as inadequate signage, restriction hours too long, against the idea of road closure and similar schemes in principle etc accounting for 28% of all objections received.**

The signage in place for the schemes are in line with the Traffic Sign Regulation and General Direction (TSRGD) and in general some signs are authorised by the Department for Transport if they are deemed to be outside of the current sign regulations. For the purpose of enforcement signs have to comply with current DfT regulations and special attention is given during the design stage to ensure signage compliance with DfT sign regulations.

Some objectors have suggested reducing the hours of operation of the school street to one hour during the morning and afternoon similar to some school street schemes in a few boroughs. The rationale for their suggestions was that the shorter hours would ease their perceived access problems. Some residents have stated that they avoided the school streets during the operational hours due to ANPR enforcement and use other neighbouring streets to access their properties. However, the permit system allows for resident access and their family and friends for up to 3 permits.

Whilst consideration has been given to having shorter operational hours, in light of the nature of the objections and officers' consideration of those objections as detailed within this report, officers consider that this is not warranted in the current circumstances and would potentially encourage parents to drive to the school street earlier and park in order to maintain their usual school run journeys. This possibility has been borne out by other London Boroughs with whom we have informally discussed the issue. This would defeat the key objective of reducing non-essential car borne trips for school run to create a quality space for school children and to encourage walking.

The table below provides a summary of the number of responses received in objection or support, with response rate for each scheme.

| All 10 school Proposals | | | Opinions | |
|-------------------------|--------|-----------|----------|-------|
| Distance | Letter | Responses | No | Yes |
| Get Involved Survey | 5635 | 116 | 112 | 4 |
| | | 2.1% | 96.6% | 3.4% |
| Emails/Letters | | 29 | 24 | 5 |
| | | 0.5% | 82.8% | 17.2% |
| Total | | 145 | 136 | 9 |
| | | | 93.8% | 6.2% |

| Ecclesbourne Primary School | | | Opinions | |
|-----------------------------|--------|-----------|----------|------|
| Distance | Letter | Responses | No | Yes |
| Get Involved Survey | 450 | 13 | 13 | 0 |
| | | 2.9% | 100.0% | 0.0% |
| Emails/Letters | | 0 | 0 | 0 |
| | | 0.0% | 0.0% | 0.0% |
| Total | | 13 | 13 | 0 |
| | | 2.9% | 100.0% | 0.0% |

| St Thomas Beckett Catholic Primary | | | Opinions | |
|------------------------------------|--------|-----------|----------|------|
| Distance | Letter | Responses | No | Yes |
| Get Involved Survey | 509 | 4 | 4 | 0 |
| | | 0.8% | 100.0% | 0.0% |
| Emails/Letters | | 1 | 1 | 0 |
| | | 0.2% | 100.0% | 0.0% |
| Total | | 5 | 5 | 0 |
| | | 1.0% | 100.0% | 0.0% |

| Harris Primary Academy Haling Park | | | Opinions | |
|------------------------------------|--------|-----------|----------|--------|
| Distance | Letter | Responses | No | Yes |
| Get Involved Survey | 719 | 12 | 11 | 1 |
| | | 1.7% | 91.7% | 8.3% |
| Emails/Letters | | 2 | 0 | 2 |
| | | 0.3% | 0.0% | 100.0% |
| Total | | 14 | 11 | 3 |
| | | 1.9% | 78.6% | 21.4% |

| Keston Primary | | | Opinions | |
|---------------------|--------|-----------|----------|------|
| Distance | Letter | Responses | No | Yes |
| Get Involved Survey | 500 | 38 | 37 | 1 |
| | | 7.6% | 97.4% | 2.6% |
| Emails/Letters | | 15 | 15 | 0 |
| | | 3.0% | 100.0% | 0.0% |
| Total | | 53 | 52 | 1 |
| | | 10.6% | 98.1% | 1.9% |

| Downsview Primary School | | | Opinions | |
|--------------------------|--------|-----------|----------|-------|
| Distance | Letter | Responses | No | Yes |
| Get Involved Survey | 305 | 7 | 6 | 1 |
| | | 2.3% | 85.7% | 14.3% |
| Emails/Letters | | 1 | 1 | 0 |
| | | 0.3% | 100.0% | 0.0% |
| Total | | 8 | 7 | 1 |
| | | 2.6% | 87.5% | 12.5% |

| Christ Church CoE Primary School | | | Opinions | |
|----------------------------------|--------|-----------|----------|------|
| Distance | Letter | Responses | No | Yes |
| Get Involved Survey | 528 | 11 | 10 | 1 |
| | | 2.1% | 90.9% | 9.1% |
| Emails/Letters | | 3 | 3 | 0 |
| | | 0.6% | 100.0% | 0.0% |
| Total | | 14 | 13 | 1 |
| | | 2.7% | 92.9% | 7.1% |

| Oasis Academy Ryelands | | | Opinions | |
|------------------------|--------|-----------|----------|-------|
| Distance | Letter | Responses | No | Yes |
| Get Involved Survey | 1295 | 7 | 7 | 0 |
| | | 0.5% | 100.0% | 0.0% |
| Emails/Letters | | 5 | 2 | 3 |
| | | 0.4% | 40.0% | 60.0% |
| Total | | 12 | 9 | 3 |
| | | 0.9% | 75.0% | 25.0% |

| Ridgeway Primary School | | | Opinions | |
|-------------------------|--------|-----------|----------|------|
| Distance | Letter | Responses | No | Yes |
| Get Involved Survey | 209 | 8 | 8 | 0 |
| | | 3.8% | 100.0% | 0.0% |
| Emails/Letters | | 1 | 1 | 0 |
| | | 0.5% | 100.0% | 0.0% |
| Total | | 9 | 9 | 0 |
| | | 4.3% | 100.0% | 0.0% |

| Harris Primary Academy Croydon | | | Opinions | |
|--------------------------------|--------|-----------|----------|------|
| Distance | Letter | Responses | No | Yes |
| Get Involved Survey | 927 | 8 | 8 | 0 |
| | | 0.9% | 100.0% | 0.0% |
| Emails/Letters | | 0 | 0 | 0 |
| | | 0.0% | 0.0% | 0.0% |
| Total | | 8 | 8 | 0 |
| | | 0.9% | 100.0% | 0.0% |

| St Joseph's Catholic Junior School | | | Opinions | |
|------------------------------------|--------|-----------|----------|------|
| Distance | Letter | Responses | No | Yes |
| Get Involved Survey | 193 | 8 | 8 | 0 |
| | | 4.1% | 100.0% | 0.0% |
| Emails/Letters | | 1 | 1 | 0 |
| | | 0.5% | 100.0% | 0.0% |
| Total | | 9 | 9 | 0 |
| | | 4.7% | 100.0% | 0.0% |

7.11 School Responses

Integral to the statutory consultation we received responses from 4 schools within the batch of 10. Whilst 4 schools provided comments as to whether they felt the experimental schemes were of benefit or not, other schools did not respond.

Response 1: HSS 1 – Ecclesbourne Primary School, Attlee Close – *“This scheme has been very positive for pupils, parents and staff at the school and we wholeheartedly endorse the scheme being continued permanently. We now have more children walking to school as the road is safer to cross. Parents are no longer reluctant to walk to school as they know that there won't be lots of cars jammed in Atlee Close with aggressive or dangerous driving. The number of staff cycling to work has also increased which may be because of reduced traffic flowing into the area.”* Head of School.

Response 2: HSS8 - Ridgeway Primary School – *“The Healthy Street Scheme has enabled a safer and cleaner environment around the immediate area of our school. Children and families are safer as our school opens onto a road which previously would have been busy with the congestion of parents/carers collecting and dropping off. Parents are no longer able to pull over in the middle of the road outside of school to drop off (while watching their child enter school) which is also much safer for all. Due to the reduction of vehicles moving along this road during drop off and collecting times parents and children have more space to spread out enabling staff a clearer visibility of parents and carers during collecting times and parents/carers clearer visibility of their children.”* Co-Headteacher

Response 3: HSS 9 – Harris Primary Academy Haling Park – *“The school street at Harris Primary Academy Haling Park has had a huge impact on the safety of our community. Since the school street was reinstated following a short suspension last academic year we have seen:*

Huge decrease in traffic on Haling Road at pick up and drop off times, Decrease in the amount of vehicles using Haling Road as an access route (often at high speed) between Brighton Road and Selsdon Road; Less pollution outside the school due to idling vehicles.

The School street is a necessary safety measure to keep the children and families at HPAHP safe. During the time it was suspended last year we were in great danger of seeing a child knocked over.

The School Street has had an impact on neighbouring roads due to parking. Requests have been made to the council to support the school with managing this. We have been told that this is not possible, via parking enforcement, as there are higher needs in the borough. I think it would be worth making the bottom end of Haling Road a one way loop to reduce this problem.” Head of Academy

Response 4: HSS 4 – Keston Primary School Keston Avenue – *“I can say that mostly, the street scheme works well, in terms of the traffic directly outside school is better. However, in the surrounding area, traffic flow is terrible. The scheme has shifted the problem so to speak. Our parents are aware of the scheme, however, those who are unaware, (delivery drivers/visitors etc) are incurring fines despite the signage. The signage turning off of the Coulsdon Road into Keston Ave, once seen, is too late to turn back as it is right on top of the turning.”* Keston Primary School

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 between 20-24 February 2023 on neighbouring roads using Vivacity AI Smart Sensors to assess the extent of diverted traffic as a direct result of the restricted times where school streets exist. We do not have any smart traffic sensors in the vicinity of Downsview Primary School and St Joseph Catholic Junior School and therefore were not able to collect data. However, we were able to collect traffic data using Automatic Traffic Counters.
- 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 % reduction / volume reduction is for specific roads and is bi-directional. The reduction in traffic in the 9 specific school streets which are recommended to be made permanent meets the road safety objective of the Statement of Reasons in the ETO. A reduction in traffic volume reduces the risk of road danger and creates a quality space for school children.

| Traffic Analysis in Healthy School Streets | | | | | | | |
|--|--|---------------------------------|--|---|--|---|--|
| HSS Ref | Schools | Healthy School street | Road Safety | | % Traffic Reduction (-ve)/ Increase PM (+ve) bi-directional per hour | Represent a reduction of xx vehicles during morning from two directions | Comments |
| | | | % Traffic Reduction (-ve)/ Increase AM (+ve) bi-directional per hour | Represent a reduction of xx vehicles during afternoon from two directions | | | |
| HSS1 | Ecclesbourne Primary school | Atlee Close | -27% | -13 | -26% | -11 | Very low volume in two directions |
| HSS2 | St Thomas Becket Catholic Primary School | Dickenson's Lane | -19% | -3 | -31% | -5 | Very low volume in two directions |
| HSS3 | Harris Primary Academy Haling Park | Haling Road(one way eastbound) | -82% | -63 | -84% | -111 | Historically a rat run which is significantly reduced outside |
| HSS4 | Keston Primary School | Keston Ave | -87% | -79 | -86% | -71 | low volume in traffic terms in two |
| | | Court Ave | 71% | 49 | 2% | 2 | Increase in traffic volume in Court Avenue is considered significant during the AM peak as this road forms a link between Keston Avenue and Coulsdon Road. |
| HSS5 | Downsview Primary School | Marston Way | -30% | -8 | -37% | -10 | Very low volume in two directions |
| | | Biggin Way | -71% | -84 | -63% | -40 | low volume in traffic terms in two |
| HSS6 | Christ Church CofE Primary School | Montpelier Rd | -68% | -56 | -47% | -23 | Very low volume in two directions |
| HSS7 | Oasis Academy Ryelands | Sandown Rd (one way eastbound) | -59% | -17 | -74% | -42 | Very low volume in two directions |
| | | Oakley Rd | -33% | -6 | -57% | -17 | Very low volume in two directions |
| HSS8 | Ridgeway Primary School | Southcote Rd | -71% | -25 | -78% | -31 | Very low volume in two directions |
| HSS9 | Harris Primary Academy Croydon | Thomson Crescent | -69% | -27 | -77% | -34 | Very low volume in two directions |
| | | Chapman Rd | -54% | -13 | -27% | -4 | Very low volume in two directions |
| HSS10 | St Joseph's Catholic Junior School | Woodend(one way north bound) | -6% | -1 | -58% | -18 | Very low volume in two directions |

8.1.4 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. The data in respect of the 9 experimental orders recommended to be made permanent does not demonstrate that the displacement across the area around the school streets to be significant in traffic terms. The data is assessed from the graphs shown in Appendix B of the report and focuses on the worst-case scenario during the morning and afternoon, i.e. at 0830am and 3.00pm. It is envisaged that the current displacement in the 9 school streets recommended to be made permanent, will reduce over time as more parents embrace a changed travel behaviour to more sustainable modes, i.e. walking, cycling and using public transport.

8.15 The majority of objections were received from the Keston Primary School scheme (HSS4) where traffic displacement in Court Avenue was the key issue raised. The Council carried out traffic counts using tubes across the road (Automatic Traffic Count) to measure two-way traffic movements in Court Avenue. These were installed between 22 and 28 May 2023 and collected data continuously 24 hours per day over this 7-day period. In analysing this data, we look at the 5-day average over a 12-hr period (Monday-Friday 7am -7pm).

The analysis identified the following:

| HSS | Court Avenue Traffic data 0700-0800am 2 ways | Court Avenue During Restricted times 0800-930am 2 ways | Court Avenue During restricted times 0200-0400pm 2 ways | Court Avenue After restricted times 0400-0500pm 2 ways |
|-----------------------|---|---|--|---|
| Keston Primary School | 69 (35 one way) | 118 (59 one way) | 93 (46 one way) | 91 (45 one way) |

8.1.5 The traffic analysis shows an increase in traffic in Court Avenue when a comparison is made between the volume of traffic from 0700am to 0800am and from 0800am - 0930am. Court Avenue is approximately 380 metres in length in comparison to the Keston Avenue School Street which is 140 metres. Court Avenue has historically been a route used by drivers as it links Keston Avenue to Coulsdon Road. The Automatic Traffic Counter used only takes into account vehicles passing over a set of rubber tubes in both directions. The survey is not able to identify drivers passing and parking. So, the data captured is the total volume of traffic passing a specific point where the tubes were placed. This traffic flow is a combination of:

- 1) drivers habitually using Court Avenue to head to its junction with Coulsdon Road and
- 2) parents driving to Court Avenue to park. There are numerous crossovers in Court Avenue and no parking restrictions resulting in availability of road space for parking.

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, in general we have to wait for a 3-year period for any scheme to look at the collision statistics as a result of any improvements to quantify any safety benefits via this means. In the case of 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 school street locations, and whilst it is too early to comment fully on pollution levels indicated by recent Breathe London monitoring data collected during the last week of July 2023 (refer to Appendix C), an initial review shows that levels are as would be expected at the 15 monitoring sites, with data seeming to be reliable and accurate.
- 8.2.3 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 and is an area wide measurement not necessarily a specific street measurement given that there are weather factors which have to be taken into consideration. What we have been able to deduce from the measurements taken, is that the air quality is in accordance with the mean objectives set within the UK legal limits. As such we are not able to make any comparison with before data unless we can look at historical data across London.
- 8.2.4 Under the Environment Act 2021 the government has set a target to reduce Particulate Matter (PM2.5) to an annual mean concentration target for PM2.5 of 10 µg/m³ across England by 2040. Recorded pollution levels in the school street monitoring locations are initially indicated to be well within this UK objective for Particulate Matter (PM2.5). Given the complexities of air quality monitoring, further monitoring over a longer period (ideally 12 months) will be undertaken before any conclusive and extensive opinion can be given. However, given the increase in traffic volumes in Court Avenue which are not dissipated across the network in the same way as for the other 9 school street schemes, there is potential for there to be a detrimental impact on air quality, and this further supports the removal of the school street scheme for Keston School.

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. That said, 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 in itself is a prompt to change 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. 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 COUNCIL PRIORITIES

- 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

10.1.1 Revenue and Capital consequences of report recommendations

The making of 9 permanent Traffic Management Orders (TMOs) including officer time is expected to cost approximately £10,000.

The capital budget for the ETMO equipment and works is currently sitting within the Capital Parking budget (CAP39) where currently £1.833m of budget was approved as part of the March 2023 Council Budget Report.

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 2023/24 financial year.

10.1.2 The effect of the decision

The making of the TMOs will incur expenditure as set out above, with budget available from the existing operational capital budgets for Parking (CAP39).

10.1.3 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 2023/24 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.

If these Healthy School Streets are not made permanent the council will be obliged to pay back Transport for London the sum of money allocated and spent for their development and implementation under experimental powers. Given the current financial situation and ongoing financial constraints it would be in the council's interest to approve these schemes being made permanent.

10.1.4 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: Allister Bannin, Director of Finance (Deputy S151 Officer), 15/9/23

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 and 23 and Schedule 5 to the LATOPR 1996. Once an experimental order is in force, any person may object to it becoming permanent within the period of 6 months from the date an experimental order comes into force. If the experimental order is amended, objections may be made within 6 months of that amendment coming into force. The statutory consultation responses received and set out in this report include the objections received pursuant to these provisions, to which the Council must have due regard in making its decisions.

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

10.2.9 The Greater London Authority Act 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.

10.2.10 Where 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.

Comments approved by Sandra Herbert Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. (Date 13/09/23)

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 for the introduction of the ETOs for the School Streets, 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 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.

10.3.4 Feedback from the representations received as part of the statutory objection periods on the previous and ongoing ETOs has not raised any new or emerging equalities issues. The implementing team has considerable practical experience of operating School Streets since 2017.

10.3.5 The EQIA has identified some negative impact in regards to Age, Disability, Pregnancy and Maternity however, the team has in place mitigation to address these including making provision for schools to request temporary access if necessary.

10.3.6 Comments approved by Denise McCausland Equalities Programme Manager (15/08/2023).

11. APPENDICES

Appendix A: Consultation methodology and analysis

Appendix B: Traffic data analyses

Appendix C: Air Quality data analysis

Appendix D: Equality Impact Assessment

Appendix E: DPIA

12. BACKGROUND DOCUMENTS

None.