



**CABINET
AGENDA**
for the meeting
on
7 June 2021 at
6.30 pm

To: Croydon Cabinet Members:

Councillor Hamida Ali, Leader of the Council
Councillor Stuart King, Deputy Leader (Statutory) and Cabinet Member for Croydon Renewal
Councillor Muhammad Ali, Cabinet Member for Sustainable Croydon
Councillor Janet Campbell, Cabinet Member for Families, Health & Social Care
Councillor Alisa Flemming, Cabinet Member for Children, Young People & Learning
Councillor Patricia Hay-Justice, Cabinet Member for Homes
Councillor Oliver Lewis, Cabinet Member for Culture & Regeneration
Councillor Manju Shahul-Hameed, Cabinet Member for Communities, Safety and Business Recovery
Councillor Callton Young OBE, Cabinet Member for Resources & Financial Governance

Invited participants:
All other Members of the Council

A meeting of the **CABINET** which you are hereby summoned to attend, will be held on **Monday, 7 June 2021** at **6.30 pm** in **Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX**

JACQUELINE HARRIS BAKER
Council Solicitor and Monitoring Officer
London Borough of Croydon
Bernard Weatherill House
8 Mint Walk, Croydon CR0 1EA

Victoria Lower
020 8726 6000 x14773
victoria.lower@croydon.gov.uk
www.croydon.gov.uk/meetings
27 May 2021

Residents are able to attend this meeting in person, however we recommend that you watch the meeting remotely via the following link:

<https://webcasting.croydon.gov.uk/croydon/meetings/12339>

If you would like to attend in person please note that spaces are extremely limited and are allocated on a first come first served basis. If you would like to attend in person please email democratic.services@croydon.gov.uk by 5pm the working day prior to the meeting to register your interest.

If you would like to record the meeting, we ask that you read the guidance on the recording of public meetings [here](#) before attending.

The agenda papers for all Council meetings are available on the Council website www.croydon.gov.uk/meetings

If you require any assistance, please contact Victoria Lower 020 8726 6000 x14773 as detailed above.

AGENDA – PART A

1. Apologies for Absence

2. Disclosure of Interests

In accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, Members and co-opted Members of the Council are reminded that it is a requirement to register disclosable pecuniary interests (DPIs) and gifts and hospitality to the value of which exceeds £50 or multiple gifts and/or instances of hospitality with a cumulative value of £50 or more when received from a single donor within a rolling twelve month period. In addition, Members and co-opted Members are reminded that unless their disclosable pecuniary interest is registered on the register of interests or is the subject of a pending notification to the Monitoring Officer, they are required to disclose those disclosable pecuniary interests at the meeting. This should be done by completing the Disclosure of Interest form and handing it to the Democratic Services representative at the start of the meeting. The Chair will then invite Members to make their disclosure orally at the commencement of Agenda item 3. Completed disclosure forms will be provided to the Monitoring Officer for inclusion on the Register of Members' Interests.

3. Urgent Business (If any)

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

4. Financial Performance Report - Month 1 April 2021 (Pages 7 - 24)

Cabinet Member: Cabinet Member for Croydon Renewal, Councillor Stuart King and Cabinet Member for Resources & Financial Governance, Councillor Callton Young
Officer: Interim Director of Finance, Investment & Risk, Chris Buss
Key decision: no

5. Croydon Renewal and Improvement Plan - Performance Reporting Framework & Measures (Pages 25 - 50)

Cabinet Member: Leader of the Council, Councillor Hamida Ali
Officer: Interim Assistant Chief Executive, Elaine Jackson
Key decision: no

6. Report in the Public Interest - Quarter 1 Update (Pages 51 - 136)

Cabinet Member: Leader of the Council, Councillor Hamida Ali
Officer: Interim Executive Director Resources, Asmat Hussain
Key decision: no

7. **Addressing the costs of care and support for unaccompanied asylum seeking children and young people in Croydon (To Follow)**
Cabinet Member: Cabinet Member Children, Young People & Learning, Councillor Alisa Flemming
Officer: Interim Executive Director Children, Families & Education, Debbie Jones
Key decision: no
8. **Autism Strategy (To Follow)**
Cabinet Member: Cabinet Member for Families, Health & Social Care, Councillor Janet Campbell and Cabinet Member for Children, Young People & Learning, Councillor Alisa Flemming
Officer: Director of Operations – Health, Wellbeing & Adults, Annette McPartland
Key decision: yes
9. **Recommendations from the Croydon Climate Crisis Commission (Pages 137 - 244)**
Cabinet Member: Cabinet Member for Sustainable Croydon, Councillor Muhammad Ali
Officer: Interim Executive Director Place, Sarah Hayward
Key decision: no
10. **YourCare (Croydon) Options Appraisal (Pages 245 - 260)**
Cabinet Member: Cabinet Member for Resources & Financial Governance, Councillor Callton Young
Officer: Interim Executive Director Resources, Asmat Hussain
Key decision: no
11. **Crystal Palace and South Norwood Low Traffic Neighbourhood**
- a) **Call-in Referral to Cabinet: Crystal Palace & South Norwood Low Traffic Neighbourhood (Pages 261 - 798)**
Cabinet Member: Cabinet Member for Sustainable Croydon, Councillor Muhammad Ali
Officer: Interim Executive Director Place, Sarah Hayward
Key decision: no
- b) **Response to Call-In Report: Crystal Palace & South Norwood Low Traffic Neighbourhood Response to Concerns of the Scrutiny & Overview Committee (Pages 799 - 812)**
Lead Member: Chair of Scrutiny & Overview, Councillor Sean Fitzsimons
Officer: Interim Executive Director Resources, Asmat Hussain
Key decision: no

12. Investing in our Borough (Pages 813 - 822)

Cabinet Member: Cabinet Member Resources & Financial Governance,
Councillor Callton Young

Officer: Interim Executive Director Resources, Asmat Hussain

Key decision: no

a) **Variation to extend Best Start contracts (Pages 823 - 838)**

Cabinet Member: Cabinet Member Children, Young People & Learning,
Councillor Alisa Flemming

Officer: Interim Executive Director Children, Families & Education,
Debbie Jones

Key decision: yes

13. Exclusion of the Press and Public

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

“That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended.”

This page is intentionally left blank

Agenda Item 4

REPORT TO:	Cabinet 7 June 2021
SUBJECT:	Financial Performance Report – Month 1 April 2021
LEAD OFFICER:	Chris Buss, Interim Director of Finance , Investment and Risk (S151 Officer)

SUMMARY OF REPORT:

This report provides the Council's annual forecast as at Month 1 (April 2021) for the Council's General Fund (GF) and Housing Revenue Account (HRA). The report forms part of the Council's financial management process of publically reporting financial performance against its budgets.

FINANCIAL IMPACT

This report provides the Council's annual forecast as at Month 1 (April 2021) for the Council's General Fund and Housing Revenue Account.

The Month 1 position is currently indicating a nil variance against budget, however this is before taking into account further risks and compensating mitigations which may materialise if not managed. In total, £12.407m of further risks (of which £1.491m relates to approved savings) are identified against which £8.748m of potential risk mitigations are identified and set out in the body of the report. Section 3 provides for these risks and risk mitigations and further discusses the impact on the General Fund if these were to materialise.

The HRA is indicating an overspend of £2.117m against budget. This overspend is further detailed within Section 3 of the report.

FORWARD PLAN KEY DECISION REFERENCE NO.: This is not a key decision

1. RECOMMENDATIONS

- 1.1 Cabinet are asked to note the General Fund is projecting a net nil variance as at Month 1. Service departments are indicating a £3.451m overspend with this being netted off against £3.451m underspend from a one off Covid Grant confirmed to Croydon Council for 21/22 by MHCLG as part of the Local Government Finance Settlement.
- 1.2 Note that a further number of risks and compensating opportunities may materialise which would see the year-end variance change and these are reported within Section 3 of this report. Should these risks materialise or the mitigations not be effective the Council could overspend by £3.659m.

- 1.3 Note the Housing Revenue Account (HRA) is projecting a £2.117m overspend for 21/22. If no further mitigations are found to reduce this overspend the HRA will need to drawdown funding from the HRA Reserve account.
- 1.4 Note, the above figures are predicated on forecasts from Month 1 to the year end and therefore could be subject to change as forecasts are refined and new and updated information is provided on a monthly basis. Forecasts are made based on the best available information at this time.
- 1.5 Note that whilst the Section 114 notice has been lifted a, the internal controls established as part of the S114, such as the Spend Control Panel remain. However, restrictions have been lifted for ring-fenced accounts such as the Pensions Fund, Housing Revenue Account and Coroner's Costs as these do not impact on the financial position of the General Fund. The Spending Control Panel which was set up at the beginning of November 2020 continues to meet on a daily basis.

2. EXECUTIVE SUMMARY

- 2.1. This reports sets out the Council's current General Fund revenue budget projected outturn as at Month 1, April 2021.
- 2.2. This is the first financial monthly Cabinet update report for the 2021/22 financial year 114. This is the first time the Council is reporting on a monthly basis to Cabinet and more so one of the very few local authorities in the country that is providing an update at Month 1. Most authorities do not normally produce a month 1 forecast due to the low level of transactions and the fact that finance staff are engaged in closing the council's accounts at this time.
- 2.3. The Financial Performance Report (FPR) will be presented to each Cabinet meeting and provides a detailed breakdown of the Council's financial position and the challenges it faces. It covers the GF and HRA and ensures there is transparency in our financial position, enables scrutiny by both members and the public, and hopefully offers reassurance as regards the commitment by chief officers to more effective financial management and disciplines.
- 2.4. The 2020/21 financial year was a very difficult year for the Council. The former Director for Finance, Risk and Insurance (Section 151 Officer) had to issue the Council's very first S114 notice in November 2020.
- 2.5. A further S114 notice was issued on the 2 December 2020 as the budget remained unable to be balanced. Since 8th March 2021 the S114 notice has been lifted as the Council received confirmation of a Capitalisation Direction from MHCLG of up to £70m for 2020/21 and £50m for 2021/22.
- 2.6. The Council has had the benefit of a number of recommendations from various stakeholders and scrutiny panels such as the external auditor's Report in the Public Interest. These recommendations have been taken on board and the Croydon Renewal Plan has been developed which will over the medium term

financial strategy period restore the Council's finances to balance and develop a more effective system of internal control.

- 2.7. This report forms a part of the reporting on the delivery of the Croydon Renewal Plan by ensuring the delivery of the council's budget is reported monthly and transparently. As indicated in paragraph 2.2 this is the first FPR report for 2021/22.
- 2.8. The Council is still working with the external auditors on finalising the 2019/20 audit of accounts and is in the process of completing the 2020/21 outturn position. The 2020/21 outturn will be reported to Cabinet in July 2021. Both of these events are not likely to affect the financial position of the Council as indicated in this report however, it may impact on the Council's balance sheet and reserves position. Members will be advised of any matters at the time of reporting.

3. FINANCIAL POSITION

- 3.1. The FPR shows that the Council is forecast to have a nil variance on its General Fund (after utilisation of an earmarked reserve before additional risks and mitigations, whilst the HRA is projecting a £2.117m overspend before risks mitigations. The current financial forecast is based on the known position at the time of writing this report.
- 3.2. In 2020/21 the monitoring forecasts presented details of Covid funding that the Council had received from Central Government, however the Government has not provided any further indication that it seeks to continue to fund Local Government in relation to Covid pressures and thus this section has been removed from Month 1 of 2021/22.
- 3.3. The position of the General Fund is shown below in Table 1.

Table 1 – Month 1 Projection per Directorate

Month 1 2021/22	Forecast Variance	Change from previous month	Non-Delivery of Savings	Other Pressures
Service Units	(£,000's)	(£,000's)	(£,000's)	(£,000's)
Children's Families and Education	-	-	-	-
Health, Wellbeing and Adults	1,600	-	-	1,600
Place	1,043	-	-	1,043
Resources	808	-	-	808
Departmental Total	3,451	-	-	3,451
Corporate Items	(3,451)	-	-	(3,451)
Total General Fund	-	-	-	-

- 3.4. Overspends within the services budgets have been further broken down into savings non-delivery and other pressures. Non-delivery of savings relates to non-achievement of the approved MTFS Savings whilst other pressures are as a result of new and external pressures not previously provided for within the Council's 21/22 Budget. Further explanations of these over spends are provided within Section 4 of this report.

Risks and Risk mitigations

- 3.5. As mentioned within paragraph 3.1 the forecast has been reported excluding further potential risks and risk mitigations. Risks and Risk mitigations are split into quantified and unquantified items.
- 3.6. As with the forecast set out in Table 1 and paragraph 3.5, risks are separately reported for those elements that relate to potential under-delivery of approved savings, and those that are new and not directly related to agreed savings plans.
- 3.7. Table 2a below provides for details of MTFS savings risks with a brief commentary of the projects that are at risk of delivery and Table 2b provides a list of quantified and unquantified other risks. Where risks are quantified currently these are based on high level information and departmental experiences of the service. At this stage, services are sufficiently confident in being able to manage or mitigate these risks that they are not included as part of the present forecast year-end position. However, the figure has been provided to indicate to Cabinet the likely financial impact on the budget and therefore the need to take action to deal with the risk.

Table 2a – MTFS Savings Risk

MTFS Savings Ref	MTFS Savings Description	Savings at risk
		(£,000's)
CFE Sav 03	Reconfiguration of Adolescent Services	200
CFE Sav 07	Improve Practice System Efficiency	177
CFE Sav 09	Review Children's Centres Delivery Model	223
CFE Sav 10	Additional Education Savings	16
CFE Sav 14	Cease Family Group Conference Service	60
CFE Total		676
HWA Total		-
PLA Sav 08	Public Protection and Licensing Highways & Parking Services merger	50
PLA Sav 09	Reviewing provision of Household Reuse and Recycling Centres (HRRCs)	11
PLA Sav 24	Parking charges increase 30p/30min	754
Place Total		815
Resources Total		-
Total Savings at Risk		1,491

- 3.8. Table 2a indicates that there are potential £1.491m worth of savings that may not be achieved, however services are currently carrying out further work to ensure these can be delivered or otherwise mitigated. So far no specific mitigations have been identified. Directorates are working up proposals to bring these savings at risk back on track.
- 3.9. Future FPR reports will update progress of these at risk savings. If these savings are deemed to be definitely non-deliverable they will be factored into the monthly forecast and incorporated into the forecast outturn position provided in Table 1. The services have been instructed to find mitigations for all savings that cannot be delivered to meet their budgetary total per directorate. .

Table 2b – Other quantifiable and unquantifiable risks

Quantified Risks	£'000	
CFE	5,113	<p>£0.099m To attract more Social Workers (SW) to Croydon (to cover the increasing vacancy rate), possible increase to SW rate for 20 SWs to £40 / hour for six months, at an additional cost (over and above the current number of agency SW at £35 / hour)</p> <p>£4.571m Asylum Seekers increase in children in Croydon care. (PLEASE NOTE: there is a report @ the same Cabinet – June on Asylum Seekers and this estimated risk quantum may need to be updated to ensure consistency across the two reports)</p> <p>£0.133m Emergency Duty Team – unsocial hours payments and contribution from Adults and Housing</p> <p>£0.150m Children with Disabilities, based on budget disaggregation proposals</p> <p>£0.160m Education Psychologist – traded services</p>
HWA	3,260	<p>Housing £1.8m increase in homeless accommodation costs above inflationary increases due to increased demand</p> <p>Housing £0.76m Increase in bad debt provision on arrears due to adverse economic climate</p> <p>Adults Social Care £0.7m further costs in relation to transitions care package costs of 18-25 aged clients – the budget for which has recently transferred from CFE.</p>
Place	2,253	<p>Environmental Health, Trading Standards & Licensing RISK £2.253m Covid related as delay in the Secretary of State not approving the new Selective Licensing 5 year Landlord Scheme in Jan 2021. For 2021/22 this scheme has not yet been approved by MHCLG.</p>
Resources	290	<p>Revs and Benefits - Complaints recharge of £0.290m in Revenue and Benefits team due for which the budget in service areas is insufficient to fully recharge.</p>
Total Quantified Risks	10,916	
Un-Quantified Risks		
CFE		<p>Children Social Care -Placement costs – validation of growth approved currently being completed</p>
HWA		<p>Housing - Additional unquantified risk related to landlord eviction ban being lifted at the end of May 2021 leading to a significant increase in demand for homeless services.</p> <p>Adult Social Care - The effects of Covid on the provider market. The effects of long Covid on the residents of Croydon</p>

Place		<p>Waste Collection and Street Cleansing. We have not received April's invoice yet from Veolia and it is expected that the pressure will relate to inflation which is likely to be above the corporate inflationary provision</p> <p>SEN Pressure- Some routes split due to Covid social distancing role, No Travel Training occurring over the last 12 months, this potentially has an impact of around £1million/year, Addington Valley Academy additional students, Single students attending schools, Changes to contractors providing services in year, due to performance issues.</p>
Resources		None

3.10. Table 3 provide a list of quantified and unquantified risk mitigations. These are potential risk mitigations that will require further assurance to be included within the forecast. Services managers have identified these as potential mitigations to the risks identified in paragraphs 3.8 to 3.10. Any additional risk mitigations also help the overall financial position of the Council as these would help generate a larger underspend that can be put away into reserves to support future MTFS gaps.

Table 3 - Quantifiable and unquantifiable risk mitigations

Quantified Risk mitigations	£'000	
CFE	(312)	Staffing underspend due to reduction in posts identified as part of the January VR scheme. Exits were not confirmed until after the Budget for 2021/22 was set.
HWA	(73)	Staffing underspend due to reduction in posts identified as part of the January VR scheme. Exits were not confirmed until after the Budget for 2021/22 was set.
Place	(422)	Staffing underspend due to reduction in posts identified as part of the January VR scheme. Exits were not confirmed until after the Budget for 2021/22 was set.
Resources	(142)	Staffing underspend due to reduction in posts identified as part of the January VR scheme. Exits were not confirmed until after the Budget for 2021/22 was set.
Corporate	(7,799)	Underspend due to Covid pressure that were provided within corporate not materialising as forecasted.
Total Quantified Risk mitigations	(8,748)	
Un-Quantified Risk mitigations		
CFE		None
HWA		None
Place		Highways –Street Lighting Team liaising with Commissioning & Procurement to consider options to mitigate the risks from increased rates.
Resources		Revs and Benefits - Recharge to HRA for some Complaints costs to bring income to GF.
Corporate		None

3.11. As at Month 1, if all risks and risk mitigations were taken into account, along with the forecast reported in Table 1 the Council would be overspending by £3.659m. However, budget holders at this stage of the financial year tend to be over cautious in terms of identifying potential under-expenditure whilst being more aware of budget pressures. The situation will be clarified as the year progresses and the monthly budget reports show more detail on the patterns of income and expenditure and the longer term impact of Covid on Council services becomes clearer. Service managers have been instructed to identify and implement mitigations to spend within their approved funding envelopes. As such compensating measures are developed the impact of the net risks is expected to decline.

4. SERVICE VARIANCE DETAIL

4.1. Children, Families and Education (CFE)

Summary

The CFE directorate is forecasting a nil variance for Month 1. This is a net position after factoring all budgeted income and expenditure within the directorate.

Whilst the forecast is nil the Directorate is indicating potential risks that could result in an overspend. Table 2a details 5 MTFs savings, totalling £0.676m, that are at risk of non-delivery. Furthermore, Table 2b indicates that there is a further £5.113m of other risks which could materialise through this financial year and Table 3 is projecting an opportunity of £0.312m.

4.2. Health, Wellbeing and Adults (HWA)

Summary

The HWA directorate are forecasting an overspend of £1.60m. This overspend entirely relates to the transitions service within Adult Social Care. This service moved from Children's, Families and Education to Adult Social Care on 1 April 2021. The forecast is based on the 2020/21 outturn, with adult social care projecting the same level of demand but this is higher than the available budget. The service is working to reduce demand and costs to bring this area to budget as a priority. The housing service, which is also part of HWA is reporting a nil variance.

In addition to the overspend and as identified in Table 2b the service is projecting other risks of £3.260m. These risks relate to housing services and a further potential pressure for Transitions services within adult social care. The Housing services is registering a risk of £2.560m from higher demand for temporary and emergency accommodation due to the adverse economic impact from the pandemic, the ban on evictions being lifted and increased bad debt from tenants that need to contribute towards their rent.

HWA also have a potential other opportunity of £0.073m in relation to staff underspend due to the January VR scheme.

4.3. Place

Summary

The Place directorate is forecasting an overspend of £1.043m. This overspend relates to a number of items which are further detailed below:

- **Highways overspend of £0.400m** - Street Lighting additional electricity charges due to revised rates within the new contract above inflationary increases projected.

- **Waste overspend of £0.355m** - Disposal Contract due to an increase in Residual Waste Tonnage & property growth not factored in budget.
- **Licensing overspend of £0.210m** - Shortfall in Surrey Street Market income historic pressure due to vacant plots on market
- **Licensing fees £0.066m**- Shortfall in various licenses and associated fees due to premises closing during COVID (ie. street trading, temporary event notices, personal licenses and other LA03 related applications and Skips & Scaffolding Licenses) £144k.
- **Neighbourhood Safety Officers underspend £0.090m** - Public Conveniences (£55k) saving with new Cleansing Service contract. Other minor savings (£35k). Savings due to contractual re-negotiations and £35k savings due to various minor staff underspends.

In addition to the forecasted overspend the Place directorate, as indicated in Table 2a and 2b, have provided for additional risks due to non-delivery of MTFS savings of £0.815m as well as other risks of £2.253m.

Place also have a potential other opportunity of £0.422m in relation to staff underspend due to the January VR scheme.

4.4. Resources

Summary

The Resources directorate is forecasting an overspend of £0.808m. This overspend relates to the following items

- **Legal and Governance overspend of £0.533m** - establishment budget shortfall
- **Additional Costs of £0.150m** – for the Council’s proportion of additional costs recharged from the Coroner’s service in relation to the Sandilands Inquest.
- **Digital Service overspend of £0.125m** – less than budgeted income for digital advertising income due to a delay in the implementation of the proposed scheme

In addition to the forecasted overspend the Resources directorate, as indicated in Table 2b, are indicating further risks of £0.290m and further risk mitigations of £0.142m.

4.5. Corporate

The Council received a non-fenced grant of £11.250m from Central Government in relation to additional costs that may be incurred in the current

financial year as a result of Covid 19 and was announced in the December Local Government Finance Settlement. Any costs incurred by departments are expected to be met from existing service budgets and the grant is available to meet any additional service costs over expenditure. Where practicable additional costs including lost income arising from Covid will be identified and reported separately in future reports. The forecast General Fund variance of £3.451m is currently offset by utilising part of this grant – the balance being reflected as a potential opportunity to mitigate risks.

5. Housing Revenue Account (HRA)

- 5.1. Table 4 provides a summary of the HRA Month 1 monitor, which is currently indicating a £2.117m overspend. The HRA is a self-financing ring-fenced account and will need to ensure it remains within the resources available, taking into account levels of reserves.
- 5.2. The Service Finance team are currently working on the HRA business plan that will be presented to Cabinet in July 2021.
- 5.3. The forecast overspend reported in Table 4 can be contained within HRA reserves provisionally forecast at £15.4m as at 31st March 2021.

Table 4 – Housing Revenue Account (HRA) at P1

SERVICES	Projected Variance	Explanation of Variations
	£'000	
Responsive Repairs	719	<p>£119k - Higher volume of uncompleted PPP repairs work carried over from last year</p> <p>£250k - Increase in average costs due to higher value voids, due to their condition when vacated.</p> <p>£350k - Additional spend particularly linked to disrepair cases relating to damp and mould eradication works, roofing repairs, drainage, door entry repairs and plumbing.</p>
Asset Management & Involvement	-	
Homes & Schools Improvement	-	
Regeneration Growth	-	
Neighbourhood Operations	-	
Housing Renewal	-	
Housing Solutions	500	£500k - Concord, Sycamore & Windsor estimate based on 2020/21 spend
People Centralised	-	
Service Development	-	Potential risk of pressure from increase in legal costs. No forecast provided as too early in year to determine these costs and no provision has been made for any legal matters that may arise above the norm
Income & Lettings	110	£110k - Non achievable income and recharges including Council tax pressure on void properties
Neighbourhood & Tenancy Service	488	<p>£153k - CCTV recharges to the HRA</p> <p>£20k - Salary upgrade for bulk drivers and Safeguarding officer</p> <p>£95k - weekend overtime agreed for Caretakers</p> <p>£100k - Hotel costs, last year's was £54k</p> <p>£120k - Responsive repairs, last year's was £60k</p>
Emergency Accommodation	100	£100k Gillet Road Concierge charges
Leaseholder Services	-	
Tenants Income	-	
Garage and Commercial Properties	100	<p>£80k - Rent loss through voids</p> <p>£20k - shortfall in other sources of income such as recharges for lost keys, door entry cost etc.</p>
Directorate & Centralised costs	100	£100k - Executive Director for 6 months
Statement of Movement in HRA Balance	-	
Total HRA	2,117	

6. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1. Finance comments have been provided throughout this report.

Approved by Chris Buss, Interim Director of Finance, Investment and Risk (S151 Officer)

7. LEGAL CONSIDERATIONS

- 7.1. The Head of Litigation and Corporate Law comments on behalf of the interim Director of Law and Governance that the Council is under a statutory duty to ensure that it maintains a balanced budget and to take any remedial action as required in year.
- 7.2. The Council is required by section 151 of the Local Government Act 1972 to make arrangements for the proper administration of its financial affairs. The Council's Chief Finance Officer has established financial procedures to ensure the Council's proper financial administration. These include procedures for budgetary control. It is consistent with these arrangements for Cabinet to receive information about the revenue and capital budgets as set out in this report
- 7.3. The monitoring of financial information is also a significant contributor to meeting the Council's Best Value legal duty and therefore this report also complies with that legal duty.

Approved by: Sandra Herbert, Head of Litigation and Corporate Law on behalf of the interim Director of Law and Governance & Deputy Monitoring Officer.

8. HUMAN RESOURCES IMPACT

- 8.1. There are no immediate workforce implications as a result of the recommendations in this report. Any mitigation on budget implications that may have effect on direct staffing will be managed in accordance with relevant human resources policies and where necessary consultation with recognised trade unions.

Approved by: Sue Moorman, Director of Human Resources

9. EQUALITIES IMPACT

- 9.1. There are no equalities impacts as a result of this report.

Approved by: Yvonne Okiyo on behalf of the Director of Equalities

10. ENVIRONMENTAL IMPACT

10.1. There are no Environment implications.

CONTACT OFFICER: Matthew Davis, Deputy Section 151 Officer

APPENDICES: Appendix 1 – Service Budgets and Forecasts

BACKGROUND DOCUMENTS: None

SERVICE BUDGETS AND FORECASTS

	Approved Budget (£,000's)	Current Actuals* (£,000's)	% Actual v Budget (%age)	Full-Yr Forecast (£,000's)	Projected Variance (£,000's)
C1245P : CHILDREN, FAMILIES AND EDUCATION DIRECTORATE SUMMARY	10,732	55	1%	10,732	-
C1205P : QUALITY, PERFORMANCE AND IMPROVEMENT	(18)	49	-272%	(18)	-
C1210P : CHILDREN'S SOCIAL CARE	90,886	6,483	7%	90,886	-
C1220P : EDUCATION	14,069	26,750	190%	14,069	-
EDUCATION HIGH NEEDS DSG	-	-	0%	-	-
CLOSED SCHOOL	-	-	0%	-	-
CHILDRENS, FAMILIES AND EDUCATION	115,669	33,337	29%	115,669	-
	Budget (£,000's)	Actuals* (£,000's)	v Budget (%age)	Forecast (£,000's)	Variance (£,000's)
C1410P : ADULT SOCIAL CARE AND ALL-AGE DISABILITY	114,342	13,087	11%	115,942	1,600
C1415P : INTEGRATION AND INNOVATION	-	371	0%	-	-
C1662P : PUBLIC HEALTH	-	574	0%	-	-
Subtotal - HWA	114,342	14,032	12%	114,342	-
C1250P : GATEWAY SERVICES	23,298	855	4%	25,398	-
C1420P : HOUSING ASSESSMENT & SOLUTIONS	5,728	3,249	57%	5,728	-
ADULTS, HEALTH AND WELLBEING	143,368	18,136	13%	145,468	1,600

	Approved Budget (£,000's)	Current Actuals* (£,000's)	% Actual v Budget (%age)	Full-Yr Forecast (£,000's)	Projected Variance (£,000's)
C1120P : PLANNING	896	(1)	0%	896	-
C1160P : GROWTH EMPLOYMENT AND REGENERATION	1,454	550	38%	1,454	-
C1114P : CROYDON CULTURE GROWTH	11,213	242	2%	11,213	-
C1110P : PUBLIC REALM	36,346	19,866	55%	37,220	874
C1130P : VIOLENCE REDUCTION NETWORK	1,931	(15)	-1%	1,931	-
C1100P : PLACE DIRECTORATE SUMMARY	(167)	96	-57%	(167)	-
C1116P : CROYDON GROWTH FUND	40	(17)	-43%	39	(1)
C1150P : HOMES AND SOCIAL INVESTMENT	10,105	506	5%	10,275	170
C1115P : DEVELOPMENT					
C1140P : PLACE HOLDING AND SUSPENSE ACCOUNTS					
C1135P : PLACE BALANCE SHEET SUMMARY					
PLACE	61,818	21,225	34%	65,362	1,043

	Approved Budget (£,000's)	Current Actuals* (£,000's)	% Actual v Budget (%age)	Full-Yr Forecast (£,000's)	Projected Variance (£,000's)
C1900P : STRATEGY AND PARTNERSHIPS	3,578	321	9%	3,578	-
C1610P : DIRECTOR OF COMMISSIONING AND PROCUREMENT	8,484	496	6%	8,484	-
C1620P : DIRECTOR OF HUMAN RESOURCES	191	644	337%	191	-
C1655P : RESOURCES DIRECTORATE SUMMARY	(173)	11,799	-6820%	(48)	125
C1665P : DIRECTOR OF FINANCE INVESTMENT AND RISK	10,885	10,012	92%	11,035	150
C1670P : CROYDON DIGITAL SERVICE	406	793	195%	406	-

C1675P : DIRECTOR OF LAW AND GOVERNANCE	7,147	557	8%	7,680	533
C1605P : DIRECTOR OF FM AND SUPPORT SERVICES	258	10	4%	258	-
C1650P : RESOURCES SUSPENSE AND HOLDING ACCOUNTS	-	(36)	0%	-	-
RESOURCES	30,776	24,596	80%	31,584	808

** The financial system has rolled over items that relate to 20/21 accruals and these need a manual adjustment before an accurate in month figure can be monitored. This will be done once the year end accounts have been completed and outturn for 20/21 finalised. This is a standard practice on all financial system.*

This page is intentionally left blank

REPORT TO:	CABINET 7 June 2021
SUBJECT:	Croydon Renewal and Improvement Plan - Performance Reporting Framework & Measures
LEAD OFFICER:	Gavin Handford, Director of Policy & Partnership Caroline Bruce, Head of Business Intelligence, Performance and Improvement
CABINET MEMBER:	Councillor Hamida Ali, Leader of the Council
WARDS:	All

SUMMARY OF REPORT

This report provides an update on the implementation of the Council's Corporate Performance Action Plan and development of the associated performance reports as agreed at Cabinet on the 12 April 2021. The performance, finance and risk report (appendix A) will improve the corporate performance offer by providing timely and accurate performance data on programme / project status, performance against Corporate Renewal Plan KPI's, and progress against the delivery of financial savings. Monitoring of risks associated with these deliverables, as well as the impact to corporate risks, are currently being developed, and will be incorporated into future reports.

The performance, finance and risk report, appendix A, reviews performance, based on available data as at 30 April 2021. It should be noted that the 30 April is a snapshot in time and that not all data will actually relate to this time period due to time lags on data availability etc.

The creation and development of these reports is an iterative process and we will produce, build and present these reports on a monthly basis. This will mean that the contents of the reports will grow in line with the development. Therefore, the report in appendix A, is a work in progress and will continue to be developed, with a fully populated report incorporating the four areas of programmes, performance, finance and risk becoming available in September 2021.

FINANCIAL IMPACT

There are no direct financial implications arising from this report.

FORWARD PLAN KEY DECISION REFERENCE NO.: This is not a key decision

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below:

1. RECOMMENDATIONS

- 1.1 Note the progress that has taken place with regard to the development of a suite of reports in order to improve the corporate offer.

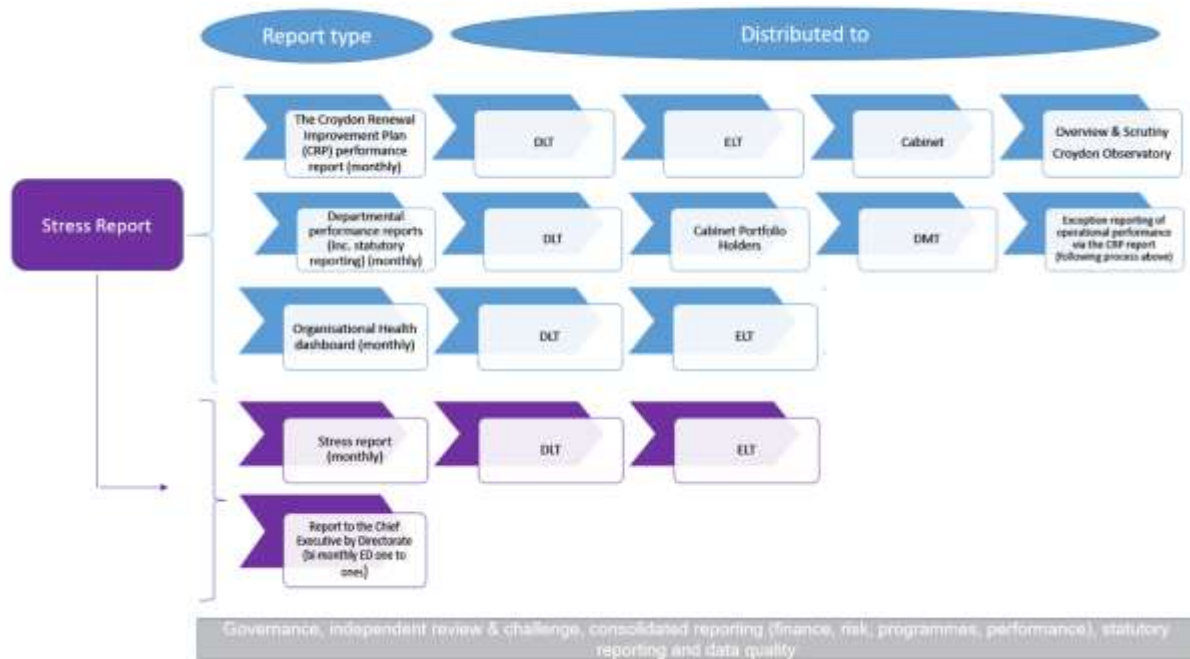
- | |
|--|
| <p>1.2 Review the corporate performance and finance report (appendix A) as at 30 April 2021 with regard to KPI's, project milestones and projected savings against target, noting that this report is still in development stage.</p> <p>1.3 Note that this report will be reviewed at General Purposes Audit Committee on the 10 June and Scrutiny and Overview Committee on the 15 June.</p> |
|--|

2. EXECUTIVE SUMMARY

- 2.1 The Croydon Renewal Improvement Plan, sets out how the Council will respond to the various reviews and recommendations that have highlighted substantial need for improvements. The Improvement Plan has also identified key areas of focus which are essential to changing the overall culture of the Council to one that is evidence led, manages resources well, and is open and transparent with stakeholders.
- 2.2 The corporate performance and finance report, detailed in appendix A of this report, reviews the areas of project and programme delivery, delivery of financial savings identified and the KPI's used to monitor delivery of the actions detailed within the CRP plan. The report reviews performance as at the 30 April 2021. It should be noted that where measures are subject to a reporting time lag the latest available data has been included; this may not correspond with the reported time period.

3. Background

- 3.1 Cabinet and Council agreed in September 2020 to the development of the Croydon Renewal and Improvement Plan (CRP) which incorporates a financial recovery plan to develop a sustainable budget over the medium term, the submission to MHCLG to secure the necessary capitalisation direction as part of that financial recovery, a corporate Improvement Plan to deliver the required changes to ensure the financial investment and rebalancing of the budget is sustainable and an Improvement Board that will oversee and ensure delivery and improvement actually takes place. A further CRP update report was presented to Cabinet 12 December 2020
- 3.2 The Report in the Public Interest which forms part of the CRP, found that due to a weak performance culture within the organisation, corporately the council has been lacking in reports which provide timely and accurate performance data highlighting areas which need improving. As part of this work, the Council's current performance management arrangements, its Data Culture, Data Capability and Data Quality have been reviewed.
- 3.3 On 12 April 2021 a report was presented to, and approved by cabinet, detailing a suite of actions to create a corporate performance framework as detailed below. This reporting mechanism will ensure that what the data is telling us is visible to everyone and open to challenge.



4. The reports

4.1 Corporate performance, finance and risk report.

4.2 This report will review our performance against the delivery of the actions within the Croydon Renewal Plan providing Members, the Executive Leadership Team, Directors, Overview & Scrutiny and Residents with high-quality information on the performance of major programmes and projects, delivery of financial savings, progress of Key Performance Indicators (KPI's) and risks associated to non delivery. This report, by exception, will highlight if the projects and programmes are not running on time, and within budget, progressing against delivery of expected savings to time, or not meeting performance against KPI's. The report is produced on a monthly basis commencing with latest performance data available as at April 2021. The creation and development of this report is an iterative process and we will produce, build and present these reports on a monthly basis. This will mean that the contents of the reports will grow in line with the development. A full report is expected to be available from September 2021

4.3 The report is composed of four parts

4.3.1 **Key Performance Indicators (KPI's)** - Regular review and monitoring against the agreed performance measures. Impact performance will have against finance, risk and programme deliverables.

4.3.2 There are currently 119 KPI's within the Corporate Performance Dashboard. Some KPI's continue to be in a development stage where we are clarifying the methodology to be used and where the data can be sourced. Where targets have been set, a RAG status has been applied. KPI's which are at target will receive a green status, those within 10% of target an amber status and those which are operating below target by more than 10% a red status. Where a

measure has no target, either because it is not appropriate to set one or we are still benchmarking the measures, the RAG status will be shown as grey. Where a measure has not data or target at the moment, the RAG status will be shown as black. Please see the Croydon corporate performance dashboard of Appendix A for detailed performance data where it is available.

4.3.3 As detailed in this report, the development of this performance dashboard and the KPI's within it, is an iterative process and where measures are yet to be set with a target, methodology is under development or we are in the process of identifying a data source, this should all be in place by September 2021. Housing specific measures are to be agreed with the new Executive Director of Housing and will form part of the next report.

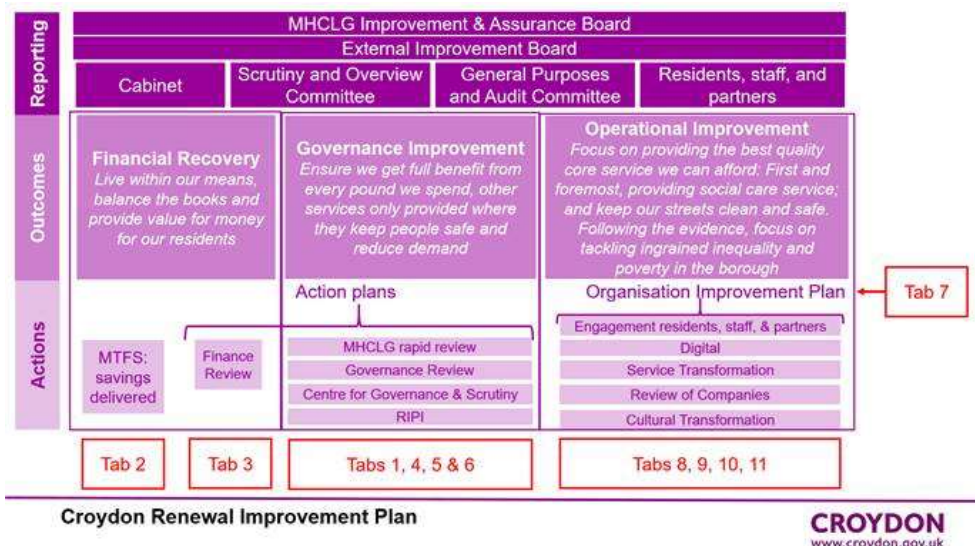
4.3.4 **Project & Programmes** - Monitoring of milestones, deliverables and issues

4.3.5 The council has established, and intends to grow, a central Programme Management Office (PMO). The purpose of the PMO is to ensure oversight and governance of delivery of the individual projects that make up the Croydon Renewal Plan (CRP).

4.3.6 Initially, there were 11 programmes of work that made up the Croydon Renewal Improvement Plan, created from all the recommendations that external and internal groups provided:

- Medium Term Financial Strategy
- Report in the Public Interest
- Adult Social Care Improvement Plan
- Children, Families & Education Plan
- Croydon Finance Review
- Governance Review
- Centre for Governance & Scrutiny Review
- Cultural Transformation
- Organisational Improvement Plan
- MHCLG Rapid Review
- Council investment, asset management, and divestment activities and relationship with its third party companies

4.3.7 Within these 11 programmes there were in excess of 600 CRP recommendations that could be treated as individual projects. These were collated into one spreadsheet that displays one tab per Programme within the CRP as detailed in the diagram below.



4.3.8 This spreadsheet formed part of the application for the Capital Directive made to MHCLG on 15th December, 2020. Between the submission date and the end of the first week of January, 2021, the projects were reviewed line by line so that any duplicate actions could be removed. This de-duplicated action list was then uploaded in to Croydon’s programme management software: “LBC Delivery Tracker”, with corresponding MS Teams cards to track progress at a granular task level. The LBC Delivery Tracker allows for centralised, regular, monitoring of both progress and confidence in delivering the projects that make up the programmes of the CRP.

4.3.9 **Three year Croydon Renewal Plan - April 2021 to March 2023**

- 633 actions initially identified for three year recovery
- 470 actions after initial de-duplication
- Approximately 380 actions after consolidation of similar actions
 - Within the tracker, there are now 481 actions, this is due to a request from Finance to split the generic 15% staff savings delivered last year by team, rather than department.

4.3.10 **Action status across full three year programme:** A detailed breakdown of each project can be found in section 2 Appendix A of this report

- Post de-duplication/consolidation 86 actions complete, representing £13,186,000 (finance confirmation pending)
- 51.3% of all actions are in progress
- Actions not yet underway have defined start dates across the full three years of the programme

4.3.11 The PMO have established a RACI Framework that clearly explains which individuals are **R**esponsible, **A**ccountable, **C**onsulted, and **I**nformed with regard to the delivery of projects within the CRP. The PMO meet with those responsible and accountable for delivering projects regularly, and ensure that the LBC delivery tracker provides an accurate reflection of the current project status, covering the following areas:

- Delivery progress

- Financial progress
 - Risks, issues and associated mitigations
- A Community of Practice within the Council has been established, where best practice, training, key messages for project and programme managers can be shared.
 - Developed a new Project initiation process.
 - Met with Essex County Council, the LGA, Waltham Forest, Camden and other local authorities, to discuss delivery assurance and governance. Essex CC in particular have shared their best practice documentations and given feedback on the Croydon process.

4.3.12 **Financial savings** - Savings and growth targets as identified in the Croydon Renewal Action

4.3.13 The Financial Monitoring Report for period one of the 2021/22 financial year, presented to Cabinet on the 7 June 2021 details projects that are at risk of delivery. Table 2a of the Financial Monitoring Reports provides full details of MTFs savings risks with a brief commentary of the projects that are at risk of delivery. To date, the total savings at risk are £1.65m

4.3.14 The Financial Monitoring Report for period 2 which will be presented to cabinet on the 12 July will update progress of these at risk savings. If these savings are deemed to be definitely non-deliverable they will be factored into the monthly forecast and incorporated into the forecast outturn position.

4.3.15 **Risk** - This report will monitor the risk to the delivery of the CRP actions and savings and the potential impact against corporate risks and mitigation in place. This section of the report remains under development and it is anticipated that the report to cabinet in September will contain risk updates

5. **Departmental and statutory performance reporting** – as detailed in the report of the 12 April, these reports will include a suite of measures from the CRP report, operational performance reports and statutory measures. These reports will be presented at monthly Departmental Leadership Team meetings to allow a process of review, check and challenge by the Executive Director with their Directors. Executive Directors / Directors will be responsible for discussing the contents of departmental and statutory performance reports with the relevant Cabinet Member to ensure line of sight and accountability. The first of these reports were presented to DLT's on the 12 May. Presentation of these reports to DLT's will take place on a monthly basis, having formed a standing item on DLT agenda's.

6. **Organisational Health Dashboard** – This dashboard contains detailed information relating to the organisations workforce and residents, specifically looking at areas of agency spend, sickness, staff turnaround and satisfaction, complaints, FOI requests and so on. Further development work is taking place and we are currently developing two additional modules to the current

dashboard to include Health and Safety and Equalities measures. Data from this dashboard, which can be accessed in real time outside of the reporting framework, will be reported to Cabinet, DLT's, and ELT on a monthly basis, by exception, with the developed modules becoming part of the suite from September 2021.

7. **Stress report** – as detailed in the report of the 12 April, the Stress report will be used to support the Executive Leadership Team to scan for;
- unintended consequences as a result of the changes the council needs to undertake over the next three years;
 - Potential increased demand, population demographics, risks, expenditure and the impact these may have to the council and its journey, and the impact on residents;
 - Areas of continued underperformance in areas of the council - as identified via Departmental Leadership and service reports;
 - Areas of performance where the current direction of travel is in a downward trajectory – as identified via Departmental Leadership and service reports;
 - Areas of high spend low output;
 - Ensuring there are 'no surprises' and always for informed and planned decision making;
 - Ensuring the use of robust data, including financial and benchmarking to support the delivery of the new priorities for the council.

7.1 Work is currently under way in the development and design of this report and it is anticipated that production will commence in July 2021 with a full version of the report complete for monthly dissemination to ELT from September 2021.

8. **Report to the Chief Executive** – These reports will focus on the data from the suite of reports as detailed above, with the focus being on one department per report. This will allow for informed one to one sessions between the Chief Executive and the relevant Executive Director. Developmental work continues on this report.

9. **Frequency of reporting**

9.1 As agreed at the 12 April Cabinet meeting, once the framework is fully established and implemented, performance reporting will take place at different frequencies as deemed appropriate (monthly, quarterly, annually) depending on the type of report and audience. Performance reports to Cabinet will be presented on a monthly basis, with frequency of reporting being reviewed in November 2021.

9.2 Reporting to ELT, DLT and Cabinet Members will take place on a monthly basis and will be aligned with the financial reporting timetable. The first of these reports were presented to DLT's on the 12 May and to ELT 18 May 2021, and are now a standing item on DLT and ELT agenda's.

10. Creation of an internal control board – performance management

- 10.1 As part of the Council's improvement programme, a series of control boards will be established. It is proposed that an Internal Control Board for Performance is created with members from all parts of the organisation such as HR, CDS, Finance, Performance, System Leads, and Subject Matter Experts (statutory). This will strengthen operational oversight of performance and data across all areas of the organisation. This control board will be developed as part of the Eco System work.

11. Data Not Received (DNR) reporting

- 11.1 In order to support the culture change toward performance management across the whole organisation, where data has not been received / input into relevant systems to allow for the data to be extracted in time for report production, reports will contain a section detailing areas where we have been unable to report. This will allow accountable offers to investigate why data has not been input into the relevant system in a timely manner, which can then be addressed.

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 12.1 It is essential that the Council takes steps to ensure that a robust performance management plan and framework are in place, alongside the work of the Programme Management Office, Finance and Risk. Delivery against the actions in the CRIP and sustainable improvements in services are unlikely to happen without it.

13. OPTIONS CONSIDERED AND REJECTED

- 13.1 None.

14. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 14.1 There are no direct financial implications arising from this report. There will be financial implications associated with the delivery of the projects and actions within the Croydon Renewal and Improvement Plan which have been factored in to the Medium Term Financial Strategy. The delivery of these projects and actions, and the resulting savings is essential. It is therefore critical that effective monitoring and reporting is in place.

Approved by: Matthew Davis, Head of Finance, (Deputy S151 Officer)

15. LEGAL CONSIDERATIONS

- 15.1 There are no direct legal implications arising from the recommendations in

this report. Any legal implications arising in relation to individual actions will be dealt with as projects and decisions come forward for approval.

Approved by: Sandra Herbert Head of Litigation and Corporate Law for and on behalf of the interim Director of Law and Governance and Deputy Monitoring Officer.

16. HUMAN RESOURCES IMPACT

- 16.1 Key to delivery of the Croydon renewal and Improvement Plan will be to retain and invest in a skilled workforce, who are enabled and engaged through a positive organisational culture. The council's workforce strategy is aligned to the Croydon Renewal & Improvement Plan and supports building the workforce skills and capacity for the future.
- 16.2 Any planned service changes through informed review, will be subject to the council's organisational change procedure and consultation with staff and trade unions.

Approved by: Sue Moorman, Director of Human Resources.

17. EQUALITIES IMPACT

- 17.1 In April 2011 the Equality Act (2010) introduced the public sector duty which Extends the protected characteristics covered by the public sector equality duty to include age, sexual orientation, pregnancy and maternity, and religion or belief.
- 17.2 Section 149 Equality Act 2010 requires public bodies to have due regard to the need to:
- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
 - advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
 - foster good relations between people who share a protected characteristic and people who do not share it.
- 17.3 Having due regard means consciously thinking about the three aims of the Equality Duty as part of the process of decision-making. This means that decision makers must be able to evidence that they have taken into account any impact of the proposals under consideration on people who share the protected characteristics before decisions are taken. Equalities impact assessments will be a key part of our governance framework for the Improvement Board, with direct input from the Council's Equality & inclusion Manager.

Approved by: Gavin Handford, Director of Policy & Partnership.

18. DATA PROTECTION IMPLICATIONS - WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

18.1 **NO** - The Director of Policy & Partnership comments that there are no data protection implications arising from the contents of this report

Approved by: Gavin Handford, Director of Policy & Partnership.

19.0 REASONS FOR RECOMMENDATIONS/ PROPOSED DECISION

19.1 It is essential that the Council takes steps to address the necessary improvements required to enable Croydon Council to be a financially sustainable council delivering value for money efficient and effective services.

CONTACT OFFICERS:

Caroline Bruce, Head of Business Intelligence, Performance and Improvement
Craig Ferguson, Business Insight Manager

APPENDICES TO THIS REPORT:

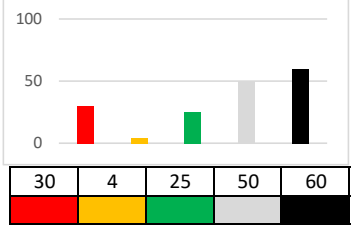
Appendix A – Corporate performance and finance report

BACKGROUND PAPERS:

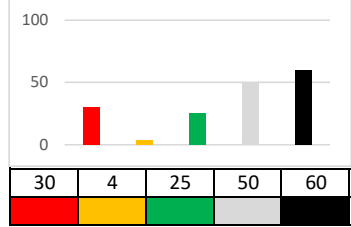
Croydon Renewal and Improvement Plan

PERFORMANCE FRAME

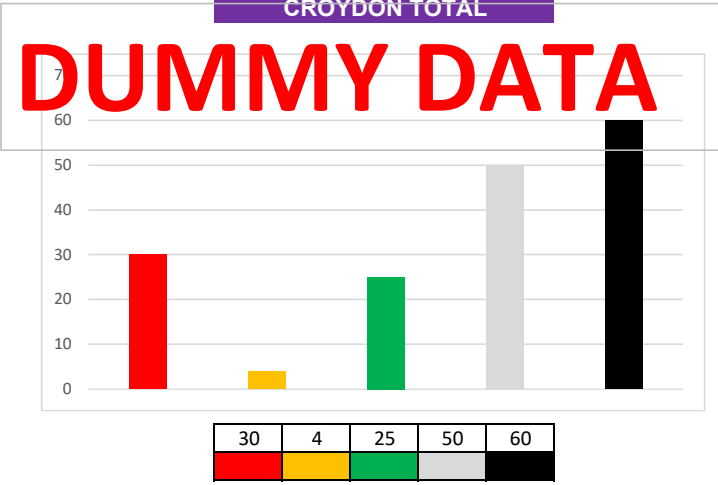
PLACE



CFE

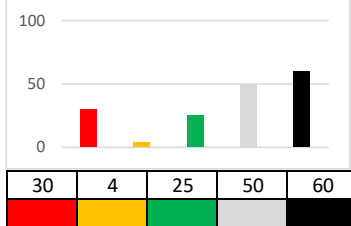


CROYDON TOTAL

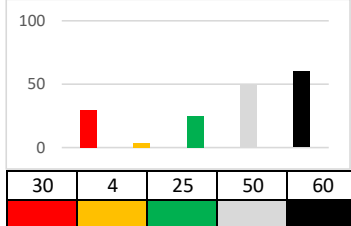


Red Amber Green Data but no target No data and no target

RESOURCES



HWA



APPENDIX A - THIS A DRAFT REPORT IN PRODUCTION

Corporate performance, finance & risk report overview (KPI's)

GOING WELL

Going well will review performance in areas that have made an improvement, compared to past performance. It will also, where possible, benchmark on performance compared to other London LA's, and / or national average.

ONES TO WATCH

Ones to watch will monitor performance where, from a strong position, performance is being to deteriorate to enable decision makers to make informed choices as to how to manage / improve performance in a timely manner. It will also, where possible, benchmark on performance compared to other London LA's, and / or national average.

THINGS TO DO BETTER

Things to do better will highlight performance that is not meeting the expected standard / target, and the potential consequences the organisation could face as a result. It will also, where possible, benchmark on performance compared to other London LA's, and / or national average.

This section of the report will be populated when monthly comparative data is available

CROYDON CORPORATE PERFORMANCE DASHBOARD



Latest Update: APRIL 2021

APPENDIX A - THIS A DRAFT REPORT IN PRODUCTION

REF.	INDICATOR	LATEST DATA						PREVIOUS DATA		NOTES
		Frequency	Timeframe	Target	Croydon position	Change from previous	RAG	Timeframe	Croydon position	

PLACE

PUBLIC REALM

PL PR 19	Number of Park Patrols	Monthly	Apr-21							This figure will not be available until mid May
PL PR 20	Number of District Centre Patrols	Monthly	Apr-21							This figure will not be available until mid May
PL PR 23	% of household waste sent for reuse recycling and composting	Quarterly	Q3 2020/21		44.2%					
PL PR 25	Missed Bins per 100k	Monthly	Apr-21		98					
PL PR 28	% of Streets below grade rectified in time	Monthly	Apr-21		99.7%					
PL PR 30	Street lighting performance and maintenance (% of lights in light)	Monthly	Apr-21	99%	99.75%					If performance target is not met then financial adjustment are applied to Service Provider under PS2.
PL PR 32	Parks and open space Volunteer Days per month	Quarterly								
PL PR 33	Street champion Volunteering days per month	Quarterly								
PL PR 53	% of Licence applications to be processed within statutory timescales	Quarterly								
PL PR 56	% of applications with representations are referred to licensing sub committee within statutory timescales	Quarterly								

Page 37

CROYDON CORPORATE PERFORMANCE DASHBOARD



Latest Update: APRIL 2021

APPENDIX A - THIS A DRAFT REPORT IN PRODUCTION

REF.	INDICATOR	LATEST DATA						PREVIOUS DATA		NOTES
		Frequency	Timeframe	Target	Croydon position	Change from previous	RAG	Timeframe	Croydon position	
PL PR 59	% of contaminated land assessments are conducted within service standards/statutory timescales	Quarterly								
PL PR 62	% of air quality monitoring conducted within service standards/statutory timescales	Quarterly								
PL PR 65	% of complaints about nuisance are responded to within service standards/statutory timescales	Quarterly								
PL PR 66	Private Sector Housing Service Requests concerning conditions - % initial responses within 24 hours	Quarterly								
PL PR 67	Private Sector Housing Service Requests concerning conditions - % visits within 48 hours	Quarterly								
PL PR 68	Private Sector Housing Service Requests - % initial responses within 3 days	Quarterly								
PL PR 69	Private Sector Housing Service Requests - % visits within 10 days	Quarterly								

PLANNING AND STRATEGIC SUPPORT

PL PS 03	% of Major applications processed in time (13 weeks)	Monthly		60%	0.00%					
PL PS 06	% of Minor planning applications processed in time	Monthly		65%	59.78%					
PL PS 09	% of Other planning applications processed in time	Monthly		80%	79.61%					
PL PS 10	Major Planning applications determined in time over a rolling 2 year period	Monthly		60%	85.71%					
PL PS 11	Non- Major Planning applications determined in time over a rolling 2 year period	Monthly		70%	75.95%					

CULTURE

CROYDON CORPORATE PERFORMANCE DASHBOARD



Latest Update: APRIL 2021

APPENDIX A - THIS A DRAFT REPORT IN PRODUCTION

REF.	INDICATOR	LATEST DATA						PREVIOUS DATA		NOTES
		Frequency	Timeframe	Target	Croydon position	Change from previous	RAG	Timeframe	Croydon position	
PL CUL 01	Footfall in libraries	Monthly								
PL CUL 02	Book issues in Libraries	Monthly								
PL CUL 03	Digital issues in Libraries	Monthly								

RESOURCES

CROYDON DIGITAL SERVICE

Page 39	RE CDS 01	Number of Major incidents	Monthly	Mar-21	N/A	15					Data shows Priority level 1 & 2 incidents across all suppliers.
	RE CDS 02	Number of Major incidents resolved within SLA	Monthly	Mar-21	SLA	15					Various SLAs are in place across suppliers listed in O167. Target to resolve all issues within set standards.
	RE CDS 03	Number of total incidents	Monthly	Mar-21	N/A	2,886					Includes all major and minor incidents including Priority levels 1, 2, 3 & 4
	RE CDS 05	% of issues first time fix (IT Service Desk)	Monthly	Mar-21	80%	86%					Percentage of total incidents resolved first time
	RE CDS 06	Average website uptime	Monthly	Apr-21	100%	100%					
	RE CDS 07	Number of total website visits	Monthly	Apr-21	compare to avg monthly visits	42,899					Covers the whole www.croydon.gov.uk website Data shows total traffic to the website, i.e. the number of website sessions by unique and repeat visitors. The current position figure is based on the new website. Future KPI updates will report on comparison to a monthly average figure from usage of the new website to ensure comparison on a like for like basis. After a full

CROYDON CORPORATE PERFORMANCE DASHBOARD



Latest Update: APRIL 2021

APPENDIX A - THIS A DRAFT REPORT IN PRODUCTION

REF.	INDICATOR	LATEST DATA						PREVIOUS DATA		NOTES
		Frequency	Timeframe	Target	Croydon position	Change from previous	RAG	Timeframe	Croydon position	
RE CDS 08	Number of active MyAccount users	Monthly	Apr-21	compare to avg monthly log-in	27,693 log-ins to My Account in the last 4 weeks					Baseline of 149,196 is the number of active MyAccount accounts.
RE CDS 09	Number of projects in Delivery	Quarterly	Apr-21	N/A	71					
RE CDS 10	Number of project Queued	Quarterly	Apr-21	N/A	86					
RE CDS 11	Number of projects completed year to date	Quarterly	Jan - April 2021	N/A	48					

HUMAN RESOURCES

RE HR 01	Recruitment process - % people shortlisted declared as female									
RE HR 02	Recruitment process - % people appointed declared as female									
RE HR 03	Recruitment process - % people shortlisted declared as Black, Asian, Mixed, and White ethnic minority groups									
RE HR 04	Recruitment process - % people appointed declared as Black, Asian, Mixed, and White ethnic minority groups									
RE HR 05	Recruitment process - % people shortlisted declared as LGBT									
RE HR 06	Recruitment process - % people appointed declared as LGBT									
RE HR 07	Recruitment process - % people shortlisted declared as disabled									
RE HR 08	Recruitment process - % people appointed declared as disabled									

Page 40

CROYDON CORPORATE PERFORMANCE DASHBOARD



Latest Update: APRIL 2021

APPENDIX A - THIS A DRAFT REPORT IN PRODUCTION

REF.	INDICATOR	LATEST DATA						PREVIOUS DATA		NOTES
		Frequency	Timeframe	Target	Croydon position	Change from previous	RAG	Timeframe	Croydon position	
RE HR 09	% of staff who are agency									
RE HR 10	% of new joiners rate their corporate induction experience as good or excellent									
RE HR 14	% formal employee relations cases that are resolved within 12 weeks									
RE HR 15	% LBC workforce declared as female	Annual			66.20%					
RE HR 16	% LBC workforce declared as Black, Asian, Mixed, and White ethnic minority groups	Annual			44.70%					
RE HR 17	% LBC workforce declared as LGBT	Annual			4.90%					
RE HR 18	% LBC workforce declared as Disabled	Annual			8.70%					
RE HR 19	% LBC workforce who have declared their gender	Annual			100%					
RE HR 20	% LBC workforce who have declared their ethnicity	Annual			68%					
RE HR 21	% LBC workforce who have declared their sexual orientation	Annual			64%					
RE HR 22	% LBC workforce who have declared if they have a disability	Annual			66%					
RE HR 23	Number of sick days per FTE	Monthly	Rolling Year to Apr 21	5.6	5.38					
RE HR 24	% participating in staff surveys									

CROYDON CORPORATE PERFORMANCE DASHBOARD



Latest Update: APRIL 2021

APPENDIX A - THIS A DRAFT REPORT IN PRODUCTION

REF.	INDICATOR	LATEST DATA						PREVIOUS DATA		NOTES
		Frequency	Timeframe	Target	Croydon position	Change from previous	RAG	Timeframe	Croydon position	
RE HR 25	% participating in temperature checks									
RE HR 26	% of people who have stated in temperature checks "I am proud to work for the council"									

LAW AND GOVERNANCE

RE LG 17	% of FOIs responded to within statutory time line	Monthly	Feb-21	90%	57%					
RE LG 20	% of SARs responded to within statutory timeline	Monthly	Feb-21	90%	65%					

PAYMENTS, REVENUES AND BENEFITS

RE PRB 03	Council Tax Collection as a percentage of the Net Collectable Debt	Monthly	Apr-21	10.96%	10.70%					
RE PRB 06	Business Rates Collection as a percentage of the Net Collectable Debt	Monthly	Apr-21	13.3%	14.6%					

COMMUNICATIONS

RE CM 01	Intranet news page views	Monthly	5th April - 2nd May 2021		8205					
RE CM 04	Increase in subscribers to YC Weekly e-bulletin from previous month	Monthly	Apr-21	100	640					
RE CM 06	Increase in subscribers to corporate social media accounts from previous month – FB	Monthly	Apr-21	To increase	46					
RE CM 08	Increase in subscribers to corporate social media accounts from previous month – Twitter	Monthly	Apr-21	To increase	126					
RE CM 10	Increase in subscribers to corporate social media accounts from previous month – Instagram	Monthly	Apr-21	To increase	72					
RE CM 15	Digital news hub – visits to site/click through	Monthly	Apr-21	25000	19865					Top three stories visited: 1) A message from Rachel Flowers; 2) Covid-19 update from Rachel Flowers; 3) Regina Road update

CROYDON CORPORATE PERFORMANCE DASHBOARD



Latest Update: APRIL 2021

APPENDIX A - THIS A DRAFT REPORT IN PRODUCTION

REF.	INDICATOR	LATEST DATA						PREVIOUS DATA		NOTES
		Frequency	Timeframe	Target	Croydon position	Change from previous	RAG	Timeframe	Croydon position	

DEMOCRATIC SERVICES

RE DS 01	Percentage of Draft minutes produced within 10 working days;									
RE DS 02	Number of reports published after the statutory deadline									
RE DS 03	Percentage of information requests from the Scrutiny Committee responded to within the statutory timescale									

COMMUNITY EQUIPMENT SERVICE

RE CES 03	% of CES delivery/collection/maintenance/repairs within the agreed timeframe	Monthly	Mar-21	95%	95.4%					
-----------	--	---------	--------	-----	-------	--	--	--	--	--

CHILDREN FAMILIES AND EDUCATION (CFE)

EARLY HELP AND CHILDREN'S SOCIAL CARE

CFE CSC 02	Percentage of Early Help cases that were stepped up to CSC (EH 9)	Monthly	Apr-21		31%					Target to be agreed
CFE CSC 03	Percentage of CSC referrals that were stepped down from CSC into Early Help (EH 25)	Monthly	Apr-21		0%					
CFE CSC 04	Percentage of re-referrals (front door) within 12 months (FD 8)	Monthly	Apr-21		33%					Target to be agreed
CFE CSC 05	Rates of adolescents entering/leaving care				To be developed					Measure to be developed

Latest Update: APRIL 2021

APPENDIX A - THIS A DRAFT REPORT IN PRODUCTION

REF.	INDICATOR	LATEST DATA						PREVIOUS DATA		NOTES
		Frequency	Timeframe	Target	Croydon position	Change from previous	RAG	Timeframe	Croydon position	
CFE CSC 08	Percentage of CIN* for who had review on time (those allocated to CWD teams) (CIN 7)				86%					Measure to be developed
CFE CSC 10	Net current expenditure per child on CLA placements				To be developed					Measure to be developed with finance
CFE CSC 12	Rate of local CLA per 10,000 under 18 population (CLA 2a)	Monthly	Apr-21		48.0					
CFE CSC 13	Number of UASC CLA (CLA 4)	Monthly	Apr-21		205					
CFE CSC 14	Percentage of the under 18 population who are UASC	Monthly	Apr-21		0.22%					
CFE CSC 15	Number of care leaver population formerly USAC				To be developed					Measure to be developed
CFE CSC 16	Percentage of care leaver population formerly USAC				To be developed					Measure to be developed
CFE CSC 19	Number of young people who have Appeals Rights Exhausted				To be developed					Measure to be developed

CROYDON CORPORATE PERFORMANCE DASHBOARD



Latest Update: APRIL 2021

APPENDIX A - THIS A DRAFT REPORT IN PRODUCTION

REF.	INDICATOR	LATEST DATA						PREVIOUS DATA		NOTES
		Frequency	Timeframe	Target	Croydon position	Change from previous	RAG	Timeframe	Croydon position	
CFE CSC 21	Average Caseload per Worker (W 1)	Monthly	Apr-21		16.7					Target to be agreed
CFE CSC 23	Number of staff in post after 3 years				To be developed					Measure to be developed with HR
CFE CSC 25	Percentage of Child Protection Children subject to a plan for a second or subsequent time (CP 11)	Monthly	Apr-21		26%					

EDUCATION

Page 45

CFE E 02	Children's centre activity measure (s) to be agreed				To be developed					Measure to be developed
CFE E 10	Percentage of children with an EHCP educated in-borough mainstream schools				To be developed					
CFE E 11	Average caseload per SEN caseworker				To be developed					

HEALTH WELLBEING AND ADULTS (HWA)

HWA 1	Number of clients (18-64) in: Day Care	Monthly	Apr-21		261					
-------	--	---------	--------	--	-----	--	--	--	--	--

CROYDON CORPORATE PERFORMANCE DASHBOARD



Latest Update: APRIL 2021

APPENDIX A - THIS A DRAFT REPORT IN PRODUCTION

REF.	INDICATOR	LATEST DATA						PREVIOUS DATA		NOTES
		Frequency	Timeframe	Target	Croydon position	Change from previous	RAG	Timeframe	Croydon position	
HWA 2	Number of clients (18-64) in Dom Care	Monthly	Apr-21		479					
HWA 3	Number of clients (18-64) in: Nursing	Monthly	Apr-21		51					
HWA 4	Number of clients (18-64) in: Residential Care	Monthly	Apr-21		371					
HWA 5	Number of clients (18-64) in Supported Living	Monthly	Apr-21		289					
HWA 6	Number of clients (18-64) in Respite	Monthly	Apr-21		10					
HWA 7	Number of clients (65+) in: Day Care	Monthly	Apr-21		95					
HWA 8	Number of clients (65+) in: in Dom Care	Monthly	Apr-21		1094					
HWA 9	Number of clients (65+) in: Nursing	Monthly	Apr-21		278					
HWA 10	Number of clients (65+) in: Residential Care	Monthly	Apr-21		347					
HWA 11	Number of clients (65+) in: Supported Living	Monthly	Apr-21		27					

CROYDON CORPORATE PERFORMANCE DASHBOARD



Latest Update: APRIL 2021

APPENDIX A - THIS A DRAFT REPORT IN PRODUCTION

REF.	INDICATOR	LATEST DATA						PREVIOUS DATA		NOTES
		Frequency	Timeframe	Target	Croydon position	Change from previous	RAG	Timeframe	Croydon position	
HWA 12	Number of clients (65+) in: in Respite	Monthly	Apr-21		25					
HWA 13	Number of clients on the waiting list									
HWA 14	% of Carers receiving direct payments									
HWA 16	Total number of Long Term Clients - 18-64									
HWA 18	Total number of Long Term Clients - 65+									
HWA 20	Total number of Short Term Clients - 18-64									
HWA 22	Total number of Short Term Clients - 65+									
HWA 24	% of concluded Section 42 enquiries where a risk was identified, the reported outcome was that risk was reduced or removed									
HWA 25	% Clients on Waiting List for 6 weeks or more									
HWA 26	% Annual Reviews completed on time									

Latest Update: APRIL 2021

APPENDIX A - THIS A DRAFT REPORT IN PRODUCTION

REF.	INDICATOR	LATEST DATA						PREVIOUS DATA		NOTES
		Frequency	Timeframe	Target	Croydon position	Change from previous	RAG	Timeframe	Croydon position	
HWA 27	% Annual Reviews more than 6 months overdue									
HWA 28	Number of Direct Payments (total)									
HWA 29	Caseload numbers (per locality team)									
HWA 30	Number of contacts received by the Front Door									
HWA 31	% of contacts received that result in a statutory support package									

Corporate performance, finance & risk report overview (Projects & Programmes)

GOING WELL

Going well will review projects that have made an improvement, compared to past performance

ONES TO WATCH

Ones to watch will monitor projects where, from a strong position, performance is being to deteriorate to enable decision makers to make informed choices as to how to manage / improve performance in a timely manner.

THINGS TO DO BETTER

Things to do better will highlight projects that are not on-target to deliver milestones as expected.

This section of the report will be populated when monthly comparative data is available

This page is intentionally left blank

For General Release

REPORT TO:	CABINET 7th June 2021
SUBJECT:	Report in the Public Interest – Quarter 1 Update
LEAD OFFICER:	Asmat Hussain, Interim Executive Director of Resources
CABINET MEMBER:	Councillor Hamida Ali, Leader of the Council
WARDS:	All

COUNCIL PRIORITIES 2020-2024

This covering report provides an overview of the work that has been progressed to achieve the recommendations as set out in the Report in the Public Interest. It focuses on the actions that have been progressed since the update that went to Cabinet on the 12th April 2021. Specifically on the 24 actions that were set between April and May 2021 and the 30 progressed actions to be completed by the end of June 2021.

The Action Plan for the Report in the Public Interest has been incorporated into the Croydon Renewal Plans and represents one of the 11 programmes of work being delivered.

The action plan covers a wide range of areas including financial management, governance, staff training, assets and budget development all of which are core elements of any strategy to ensure services are delivered in a responsive manner with a focus on value for money for our residents.

FINANCIAL IMPACT

This report will have no direct financial impact on the borough as its focus is on updating against the recommendations as accepted by the Council in November 2020. Some of the recommendations implemented will have an attached financial cost. This will be included in the costs of the overall improvement plan being developed for the Council and will be reported to Members when these are fully known. This will need to be contained within the existing approved budget for 2021/22.

The external auditor’s costs have totaled £65,000 to date.

FORWARD PLAN KEY DECISION REFERENCE NO.: This is not a key decision

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

The Cabinet is recommended to

- 1.1 Note and agree the progress the Council has made in regard to achieving the recommendations set out by external auditor in the Report in the Public Interest (appendix 1) with 55 out of 99 actions complete;

- 1.2 Note the beginning of work to properly evidence what has been achieved so far and the intention to carry out an internal audit of actions delivered to provide full assurance to members and residents on the change achieved;
- 1.3 Agree the refreshed action plan for the recommendations including actions marked complete, new actions and amended deadlines; and
- 1.4 Agree that this updated report and action plan go to Full Council in place of the previously agreed April 12th Cabinet Report as it is more up to date.

2. EXECUTIVE SUMMARY

- 2.1 On 23rd October 2020 the Council’s external auditor, Grant Thornton, issued a Report in the Public Interest (RIPI) concerning the Council’s financial position and related governance arrangements. In line with the statutory framework for the RIPI, the Council held an Extraordinary Council meeting on 19th November 2020 to discuss the report and the proposed action plan to address it.
- 2.2 The previous update, approved by Cabinet on the 12th April, provided a comprehensive progress update across all recommendations and also agreed the refreshed RIPI Action Plan having incorporated views from both the Scrutiny and Overview Committee (SOC) and General Purposes and Audit Committee (GPAC). This covering report represents the first quarterly Update on the RIPI response based on activity this financial year. It focuses on actions that were set to be complete by close of April and May 2021, as well as updating against actions set to be delivered by the end of June 2021.
- 2.3 This report also sets out the current approach to reporting for the remainder of this financial year. Cabinet is to note the reporting schedule as agreed previously across GPAC, SOC, Cabinet and Council. Additionally, Cabinet should note the ongoing discussions to review this reporting schedule to assess the best approach to provide effective updates to Council members as appropriate whilst limiting duplication. This is being aligned with the current review of the Council’s current meeting governance.

3. HIGH LEVEL UPDATE ON THE ACTION PLAN

- 3.1 Statistics on the number of actions complete and outstanding are below. Full detail can be seen in appendix 1.

Number of actions	Number of actions completed	Number of actions outstanding
99	55	44

- 3.2 The Council has completed 55 Actions to date with 20 delivered since the April 12th Cabinet report. Further actions have been progressed as required however, the Council acknowledges that achieving the desired outcome (e.g. co-creating a working environment that respects and values all our staff and take positive action to ensure that this is the case” LBC 4 – IV) will be a long-

term process and the Council is therefore committed to providing updates in further quarterly reports and keeping the actions open. A further 11 actions are set to be finalised by the end of June. Progress updates have been provided against all of these and all other outstanding actions (appendix 1).

3.3 Whilst good progress has been made, the Council cannot lose sight on the 44 actions that still need to be completed and has to continue to monitor actions delivered previously to ensure momentum is maintained and they have the impact expected. The Council will continue to drive to ensure actions are completed by deadline and any concerns escalated are mitigated against.

3.4 The table below sets out the actions identified as high priority by the external auditor with a RAG rating.

High Priority Action	Actions Completed/Total Actions	Rag
R1a Children's Social Care	5/5 (was 1/5 per 12 th April Update)	<p>Actions are now complete with monthly Finance, Performance & Risk reports scheduled for Cabinets going forward.</p> <p>The RAG rating has therefore been shifted to green following on from the April 12th update.</p>
R1b Adult Social Care	8/9 (was 4/9 per 12 th April Update)	<p>The outstanding action relates to the offer and deliver of training to members. Whilst an initial training offer has been compiled, work is still ongoing to approve the training offer. The meeting to approve is expected to be arranged by the end of June at the latest.</p> <p>There is potential this will slip into amber therefore in the future due to the risk of delay.</p>
R2 Adequacy of Council Reserves	2/4	<p>The outstanding actions relate to the offer and deliver of training to members. Whilst an initial training offer has been compiled, work is still ongoing to approve the training offer. The meeting to approve is expected to be arranged by the end of June at the latest.</p>

		There is potential this will slip into amber therefore in the future due to the risk of delay.
R3 Use of Transformation Funding	1/2 (was 0/2 per 12 th April Update)	<p>The outstanding action relates to the offer and deliver of training to members. Whilst an initial training offer has been compiled, work is still ongoing to approve the training offer. The meeting to approve is expected to be arranged by the end of June at the latest.</p> <p>There is potential this will slip into amber therefore in the future due to the risk of delay.</p>
R9 Budget Challenge/Rigour	5/5 – Marked complete in 12 th April Update	
R12 Revolving Investment Fund	3/3 – Marked complete in 12 th April Update	
R14 Treasury Management	2/2– Marked complete in 12 th April Update	
R18 Ongoing investment in Brick by Brick	1/1– Marked complete in 12 th April Update	
R20 Governance of subsidiaries	0/9	<p>A task and finish group has now been established with Legal and Finance to work through the existing list of companies that the Council has an interest in.</p> <p>The group has been operating since April 2021 and is undertaking work around the governance process, directorships, status and relationship with its third party companies as well as assist in elements of the wider asset management review.</p>

		This recommendation will continue to be marked as amber. Work has progressed across all actions however, no actions have yet been fully delivered. (see 4.3 for further details)
--	--	--

3.5 To ensure aligned with the wider Croydon Renewal Plan activities the following criteria was utilised as developed by the PMO Steering Group.

Rag Definitions used:

Green - no known blockers to delivery

Amber - blockers to delivery with mitigations in place/planned

Red - blockers to delivery with no resolution identified

4. KEY MILESTONES ACHIEVED THIS UPDATE

4.1 A comprehensive summary of actions taken to date across all recommendations is contained within the refreshed action plan in appendix 1. This section provides some additional information on key achievements delivered since the April 12th Cabinet paper

4.2 At Cabinet on June 7th the Council will be presenting the first iteration of its monthly Corporate Finance, Performance and Risk report. These reports are being introduced to improve the corporate performance offer across the Council and provide updates on key performance indicators to monitor the delivery of actions against the Croydon Renewal Plan. The June 7th iteration will provide a final set of CRP measures, and targets set to date, as well as a further update on the work streams in place to produce a full set of corporate performance reports by September 2021 Cabinet.

4.3 RIPI recommendation 20, in particular, is a complex and resource intensive task. A working group has been established with representatives from finance and legal to review the Council's arrangement with its subsidiaries and companies it has an interest in. This group meets fortnightly and is currently established as a task and finish group with the aim of gathering information and recommending future governance arrangements. An initial review of Council registered companies has taken place to attain an understanding of the scope of work to be undertaken. A list of Council Companies has been created, which is in the process of being assessed. This task involves various officers across service areas reporting to the working group in respect of companies they are involved with. In parallel to the auditing work, the working group is considering future governance arrangements including benchmarking and best practice. It is envisaged that the working group will need to continue its work for the foreseeable future before the governance arrangements, including training, can be commenced. Further updates will be offered each quarter.

4.4 The Cost of Care tool, referred to in recommendation 1b (VIII), was procured a few years ago to enable adult social care to review how change in activity and

- service models might effect the budget. It was utilised as part of the October 2020 budget development analysis to help adult social care in its forecast of activity and spend to support budget setting. In future years the tool is superseded by the budget development advice provided through the Local Government Association. A separate tool called CareCubed is in the process of being acquired. It is a benchmarking tool that allows adult social care to acquire an indicative cost of placing an individual aligned with their assessed care and support needs. This indicative amount is then used to aid contract negotiations with providers. The tool has successfully enabled savings in other Council's and will be tested in Croydon over the next 12 months. (Recommendation 1b),
- 4.5 A training offer for Councillors has been compiled with reference to the RIPI Action Plan to ensure all aspects have been picked up. Following approval at the relevant Council meeting, action will quickly be taken to schedule and deliver training over the course of this financial year. Work is ongoing to approve the training offer, this is expected to be arranged by the end of June at the latest. A further refreshed training programme for members will be prepared later in the year for 2022, to ensure members have a framework of learning to support Council decision-making.
- 4.6 The Council has revised the approach to transformation funding to ensure that it is compliant with regulations issued by MHCLG. The guidance requires Full Council to approve the council's scheme, which is being drafted in line with Statutory guidance. Bids for transformation funding have been requested from departments and are currently being assessed against the statutory guidance. Following assessment they will be presented to cabinet for approval (recommendation 4).
- 4.7 On March 26th the Council held a virtual Croydon Renewal Conference. The purpose of the sessions delivered on this day was to share with all staff the challenges facing the Council and the core priorities that were to be achieved by September 2021. In addition, the sessions established that achieving the improvement journey facing the Council was the responsibility of all staff and everyone had to contribute to the process and cultural changes necessary to drive the Council to where it needs to be. Further to the conference, the Interim CEO and Assistant Chief Executive have continued to engage with staff, through 14 staff roadshows attend by nearly 530 people, to allow them to give feedback on the direction of the organisation and share any concerns. An engagement strategy until October 2021 has been set out regarding the Croydon Renewal Plan to maintain momentum and ensure the Council continues to be open with staff about its situation and progress (Recommendation LBC 4) .
- 4.8 Children's Services have made progress managing the sustained financial challenge resulting from Croydon being a national point of entry for Unaccompanied Asylum Seeking Children. The service has met with central government partners including the Home Office, Department for Education and MHCLG to secure practical support to relieve the financial pressures. These discussions have delivered cost savings for Croydon including full cost recovery for the age assessment team and the Duty Team at Lunar House (approximately £595k per annum agreed over 2021-22). The Council has also lobbied London Boroughs successfully to extend the pan-London rota to offer

same day placements to all newly arrived Children at Lunar House for a period of 3 months whilst a longer term solution is agreed with central government. A paper will be presented to Cabinet on June 7th providing a detailed update on the work carried out and setting out potential next steps (recommendation 6 and 7).

5. FUTURE UPDATES ON THE REPORT IN THE PUBLIC INTEREST

- 5.1 The RIPI action plan has been incorporated into the wider Croydon Renewal Plan and forms 1 of the 11 programmes of work aiming to support the Council's financial recovery, improve governance arrangements and drive operational improvement. The Croydon Renewal Plan currently consists of nearly 400 recommendations which are to be delivered within the next 5 years.
- 5.2 Per the action plan (appendix 1), quarterly RIPI updates are to be provided to GPAC, SOC, Council and Cabinet. This update will be presented directly to GPAC on the 10th June, SOC on the 15th June and Full Council on the 5th July.
- 5.3 The dates for the remaining updates this financial year are in the table shown below

5.4

RIPI Update Report	SOC	Cabinet Date	Full Council	GPAC
Q.2 Update	7 th Sept	13 th Sept	11 th October	16 th Sept
Q.3 Update	8 th February	24 th January	31 st January	3 rd Feb
Q.4 Update	29 th March	21 st March	28 th March	3 rd March

- 5.5 The RIPI action plan is closely aligned with the Corporate Finance, Performance and Risk reporting. From June 2021, these are set to come to GPAC, SOC and Cabinet on a monthly basis.
- 5.6 It is recognised that the above schedule consists of levels of duplication and the Council is reviewing mechanisms and alternative reporting structures that will increase efficiency whilst providing adequate oversight to members on progress made delivering the action plan. Any such alternative approaches will need to give due regard to the role of our external partners and the wider community.
- 5.7 The review of how both the RIPI and Corporate Finance, Performance and Risk Reporting will be reported across Council meetings will be finalised by August 2021 with the intention to implement a new approach by September 2021.

6. EVIDENCING CHANGE

- 6.1 An Internal audit of the actions marked complete in the RIPI action plan has commenced. Officers will be reviewing a sample of completed actions to give reasonable assurance that they have indeed been fully delivered. The first outcomes from this review will be shared via the Q.2 RIPI Update set for September Cabinet.
- 6.2 Beyond simply ensuring that an action is completed the audit will be evaluating the effectiveness of the delivery and focusing in part on the culture change the RIPI recommendations were set to drive. The RIPI represents only part of the wider Croydon Renewal Improvement Plan and it is recognised that the Council will need to continually promote a good culture and change old working practices well beyond the action plan's completion to embed the changes needed.
- 6.3 The internal audit will be completed in stages, actions marked complete in the April 12th Cabinet Report have been initially provided for checking (appendix 2).

7. CONSULTATION

- 7.1 The action plan has been previously reviewed by both GPAC and the SOC who made recommendations to enhance what was being progressed. These changes were approved by Cabinet on 12th April 2021. Services have been directly engaged with to ensure updates were recorded accurately and contained the most up to date information.

8. PRE-DECISION SCRUTINY

- 8.1 The latest update is set to be presented at the SOC on June 15th to allow attending Councillors to review work to date and give input. The SOC has previously given input to the development of the RIPI Action Plan in a committee on the 18th January.

9. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 9.1 To date, the external auditor's costs have totalled £65,000 as updated in the April 12th paper.
- 9.2 The Council is working to deliver the overarching improvement plan, of which the RIPI action plan forms a key part. Costs will be incurred delivering many of the actions contained within the plan and these will be presented to Members as the Council's Improvement Journey progresses. Any costs will need to be contained within existing budget provisions .

Approved by: Chris Buss Interim Director of Finance , Investment and Risk

10. LEGAL CONSIDERATIONS

- 10.1 The Report in the Public Interest (“the Report”) dated 23 October 2020 was issued under the provisions of the Local Audit and Accountability Act 2014 (“the Act”). The Council must comply with the requirements of the Act in responding to the Report.
- 10.2 Under the provisions of paragraph 5(5) and (6) of Schedule 7 to the Act, the Council must decide within a period of one month whether the Report requires the authority to take any action or whether the recommendations are to be accepted. It must also decide what, if any, action is to be taken in response to the Report and its recommendations. The Report was considered at the Council meeting on 19 November when all of the Report’s recommendations R1 – R20 and additional recommendations LBC1 – LBC3 were agreed together with an Action Plan in response to each of the recommendations. A further recommendation LBC4 was added following additional consultation. Paragraph 7 goes on to provide that the authority’s functions under paragraph 5 are not to be the responsibility of the executive.
- 10.3 Paragraph 10(1) of the Act provides that after considering the Report and its response to it, the Council must notify the external auditor of its decisions, and publish a notice on its website containing a summary of those decisions which has been approved by the external auditor.
- 10.4 At the time of writing this report, all of the relevant requirements of the Act have been complied with.
- 10.5 Any additional legal considerations arising from individual workstreams will be assessed as projects and actions come forward.

Approved by: Sandra Herbert Head of Litigation and Corporate Law for and on behalf of the interim Director of Law and Governance and Deputy Monitoring Officer.

11. HUMAN RESOURCES IMPACT

- 11.1 There are no human resource impacts arising directly from the recommendations in this report. However, there will be impacts associated with the delivery of the improvement plan. The improvement plan is part of a range of measures relating to improving the Council’s financial position and it is inevitable that this will ultimately impact on the Council’s workforce, when the Council’s agreed Human Resources policies and procedures will be followed.
- 11.2 Human resources impacts will be appropriately reported to the relevant decision-making bodies as individual actions from the plan are implemented.

Approved by: Sue Moorman, Director of HR

12. EQUALITIES IMPACT

- 12.1 There are no equality impacts arising directly from the recommendations in this report. As such, an equality analysis has not been undertaken following the initial response to the external auditor's report. However, there will be impacts associated with the delivery of the improvement plan. The improvement plan is part of a range of measures relating to improving the Council's financial position and it is inevitable that this will ultimately impact on the Council's workforce and the communities it serves.
- 12.2 Consideration will be given as each of the individual actions included in the Action Plan are implemented as to whether they are relevant to equalities and will require an equalities impact assessment undertaken to ascertain the potential impact on vulnerable groups and groups that share protected characteristics.
- 12.3 Any improvements to governance that arise from the implementation of the recommendations in the action must pay due regard to ensuring that all residents in Croydon are able to understand the actions the Council takes in their name, the decisions it makes to spend resources on their behalf, and who is accountable for that action.
- 12.4 Close attention will need to be paid to ensure the Council is as transparent as possible and is as open and engaging with all its local communities through this process of improvement and afterwards in the new governance practices that are established.

Approved by: Yvonne Okiyo, Equalities Manager

13. ENVIRONMENTAL IMPACT

- 13.1 There are no positive or negative impacts on the environment as a result of any of the recommendations of this report.

14. CRIME AND DISORDER REDUCTION IMPACT

- 14.1 There are no implications in this report that would have an impact on crime prevention or reduction.

15. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 15.1 To ensure that Cabinet has confidence that the RIPI recommendations are being progressed and to escalate any concerns.

16. OPTIONS CONSIDERED AND REJECTED

- 16.1 No other options were considered

17. DATA PROTECTION IMPLICATIONS

17.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

NO

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

NO, as the report contains no sensitive/personal data

Approved by Asmat Hussain; Interim Executive Director of Resources

CONTACT OFFICER: Henry Butt, Strategic Support Officer to the CEO, 14767

APPENDICES TO THIS REPORT: Appendix 1 – RIPI Action Plan
Appendix 2 – RIPI Action Plan – Closed actions as of 12th April 2021 Cabinet report

BACKGROUND DOCUMENTS: None

This page is intentionally left blank

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

1. The Council has fully accepted all recommendations made by the external auditor (R1-R20)
2. The Council has added additional recommendations LBC1-4
3. There are 9 high priority recommendations from the external auditor for the Council to urgently address:

High Priority Actions	High Priority Actions
R1a Children's Social Care	R12 Revolving Investment Fund
R1b Adult Social Care	R14 Treasury Management
R2 Adequacy of Council Reserves	R18 Ongoing investment in Brick by Brick
R3 Use of Transformation Funding	R20 Governance of subsidiaries
R9 Budget Challenge/Rigour	

Overall accountability for the action plan rests with the Interim Chief Executive

Recommendation 1a – HIGH PRIORITY The Executive Director Children Families and Education needs to address the underlying causes of social care overspends in children’s social care and take effective action to manage both the demand and the resulting cost pressures.				
Cabinet Member Accountability: Councillor Flemming, Cabinet Member for Children, Young People and Learning				
Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) Develop a strategy for managing demand and expected impact / outcome and set up panels to manage activity and cost: <ul style="list-style-type: none"> - Weekly care panel to divert children from care - Bi-weekly Children Looked After review panel to identify children who can be supported to be reunited with families from care, and to systematically review higher cost placements 	February 2021	The Care Panel was established in February 2021. Outcomes from the care panel & new entries to care are monitored weekly at DLT. To build on this work further process maps are being refreshed to formalise challenge, authorisation and decision making for children in care or at risk of care. A scoping workshop to enhance multi-agency partnership provision has also been delivered in March 2021.	COMPLETE	Interim Director, Early Help and Children’s Social Care
ii) Develop a monthly Corporate Finance, Performance and Risk report to progress, track and measure activity. Specifically for Children’s social care, this will monitor the effectiveness of actions to reduce the number of local children in care. This progress report will bring together data on the monthly movement in numbers of children in care, the achievement of care outcomes, the financial impact	Monthly Departmental Leadership Team (DLT) meetings whilst Corporate Finance, Performance & Risk report is developed with	The June 7 th Corporate Finance, performance & Risk report iteration will provide a final set of CRP measures, and targets set to date, as well as a further update on the work streams in place to produce a full set of corporate performance	COMPLETE – first iteration of report now developed and shared. updates	Interim Executive Director, Children Families and Education to ensure accurate data incorporated into monthly Performance reporting.

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

<p>including full year forecast, and benchmarking against best practice.</p>	<p>target date for May 2021</p>	<p>reports by September 2021 Cabinet.</p> <p>The monthly reports will develop over time as recommendations are progressed.</p>	<p>are scheduled to come to Cabinet monthly</p>	
<p>iii) The progress report will be routinely presented to the Children’s Improvement Board, Executive Leadership Team, Cabinet, General Purposes and Audit Committee and Scrutiny & Overview Committee which will bring a greater level of control and transparency (see Recommendation 5 which will also be incorporated into this process). The first report to members will be accompanied by detail outlining the statutory and non-statutory areas of service and the impact of demand management across the service.</p>	<p>March 2021</p>	<p>The Corporate Finance, Performance and Risk report will provide an update on improvement actions across the Council including Children’s. (1a-ii)</p> <p>Training will be offered to members on the nature of statutory and non-statutory service (See LBC3 – i)</p>	<p>COMPLETE – first iteration of report now developed and shared. updates are scheduled to come to Cabinet monthly</p> <p>Training offer to be picked up under Recommendation LBC-3</p>	<p>Interim Executive Director, Children Families and Education to ensure accurate data incorporated into monthly Performance reporting.</p>
<p>iv) Secure independent external challenge through the Partners in Practice programme to enable valid judgements to be made about the correct level of funding to meet the needs of Croydon’s children in care.</p>	<p>January 2021</p>	<p>Report from LB Camden received under Partners in Practice Programme – December 2020</p> <p>Independent Financial Adviser commissioned by the DFE to provide expert challenge and support commenced on 22/2/21 for a period of 9 months.</p>	<p>Complete</p> <p>Ongoing support until November 2021</p>	<p>Interim Executive Director, Children Families and Education</p>
<p>v) Data set used to inform progress report to be collated, updated and shared with GPAC to allow members to</p>	<p>New recommendation</p>	<p>Dataset developed and being progressed further.</p>		<p>Interim Executive Director, Children Families and Education</p>

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

<p>monitor progress on managing demand within social care.</p>		<p>The Corporate Finance, Performance and Risk report draws upon this data and provides GPAC with the relevant information per this action.</p>	<p>COMPLETE - first iteration of report now developed and shared. updates are scheduled to come to Cabinet monthly</p>	
--	--	---	--	--

Recommendation 1b – HIGH PRIORITY
 The Executive Director Health, Wellbeing and Adults needs to address the underlying causes of social care overspends in adults social care and take effective action to manage both the demand and the resulting cost pressures.

Cabinet Member Accountability: Councillor Campbell, Cabinet Member for Families, Health and Social Care

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) Commission a diagnostic of spend and opportunities to be carried out by the Local Government Association (LGA) National Care & Health Improvement Adviser Finance and Risks to inform future shape of transformation opportunities.	COMPLETED October 2020	This was carried out and used during November 2020 to inform development of the Adult Social Care Improvement Plan	COMPLETE	Executive Director Adult Social Care
ii) Review the current service delivery models of adult social care and gateway services to right size the budget and delivery model to benchmark with comparator Councils in relation to population and service outcomes.	December 2020	Data has been collected which provides benchmarking of Croydon ASC care spend vs other Councils, this was factored in to the Adult Social Care Improvement Plan. Budget modelling has been agreed for ASC for 21/22 budget. Service modelling forms part of adult's improvement plan.	COMPLETE	Executive Director Adult Social Care
iii) To create a placements board to challenge the Council on current cost of placements, managing demand for new placements and ensuring value for money in procurement of placements	January 2021	Placements boards have been implemented in the Council to challenge placements and reduce expenditure. Daily challenge panel has been in place since S114. All spend is then promoted to the Spend Control Panel, as agreed with then S151 Officer. Placements programme is in place with an agreed scope. Funding	COMPLETE	Executive Director Adult Social Care

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

		also agreed for Care Cubed placements tool agreed at ELT on 8 March 21.		
iv) Use the output from the diagnostic review to remodel financial implications to help shape the Medium Term Financial Strategy (MTFS)	December 2020	Diagnostic review and benchmarking data has been used to shape the Adult Social Care Improvement plan. Croydon Adults Improvement plan has been fully developed and aligned to budget as signed off at March Cabinet. LBC delivery tracker being updated fortnightly.	COMPLETE	Director of Finance, Investment & Risk
v) Develop a monthly Corporate Finance, Performance and Risk report to progress, track and measure activity. This will include monitoring of the new service delivery model to track progress and challenge effectiveness of the plan.	Monthly DLT meetings whilst wider Finance, Performance & Risk Report is developed with target date for May 2021	The June 7 th Corporate Finance, performance & Risk report iteration will provide a final set of CRP measures, and targets set to date, as well as a further update on the work streams in place to produce a full set of corporate performance reports by September 2021 Cabinet. The monthly reports will develop over time as recommendations are progressed.	COMPLETE - first iteration of report now developed and shared. updates are scheduled to come to Cabinet monthly	Executive Director Adult Social Care to ensure accurate data incorporated into monthly Performance reporting.
vi) Progress will be governed by reporting to the Executive Leadership Team, Cabinet, General Purposes and Audit Committee and Scrutiny & Overview Committee which will bring a greater level of control and transparency. The first report to members will be accompanied by detail outlining the	May 2021	The Corporate Finance, Performance and Risk report will provide an update on improvement actions across the Council including HWA's (1b-v).	COMPLETE – First iteration of report now developed and	Executive Director Adult Social Care to ensure accurate data incorporated into monthly Performance reporting.

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

<p>statutory and non-statutory areas of service and the impact of demand management across the service.</p>		<p>Training will be offered to members on the nature of statutory and non-statutory service (See LBC3 – i)</p>	<p>shared. updates are scheduled to come to Cabinet monthly</p>	
<p>vii) Ensure that cost of care tool is used effectively to track all case expenditure to improve financial control, identify areas of focus for further improvement and to enable better decision making.</p>	<p>December 2020</p>	<p>The Cost of Care tool referred to in has been utilised to help accurately forecast its spend to support budget setting, improve financial management and identify opportunities for further savings.</p> <p>A separate tool called called CareCubed is in the process of being acquired. It is a benchmarking tool that allows adult social care to acquire an indicative cost of placing an individual aligned with their assessed care and support needs. This indicative amount is then used to aid contract negotiations with providers.</p> <p>The tool has successfully enabled savings in other Council's and will be tested in Croydon over the next 12 months. Training for staff to use tool is in planning.</p>	<p>COMPLETE</p>	<p>Executive Director Adult Social Care</p>
<p>viii) Training to be provided to members to understand the budget for Adult Social Care and share rationale for persistent overspend in service. Training to also inform members on the complex health and care landscape in the borough.</p>	<p>May 2021</p>	<p>A Training offer has been compiled referencing the RIPI to ensure aspects of the action plan are picked up. Following approval at the relevant Council meeting,</p>	<p>May/June 2021</p>	<p>Executive Director Adult Social Care</p>

		<p>action will quickly be taken to schedule and deliver training over the course of this financial year. Work is ongoing to approve the training offer, this is expected to be identified and arranged by the end of June at the latest.</p> <p>A further refreshed training programme for members will be prepared later in the year for 2022, to ensure members have a framework of learning to support Council decision-making.</p>		
<p>IX) Data set used to inform progress report to be collated, updated and shared with GPAC to allow members to monitor progress on managing demand within social care</p>	<p>New recommendation</p>	<p>A finance and performance workstream has been established and meets fortnightly. The key objectives for this workstream are to ensure dashboards are developed to enable the senior management team to track activity against the benchmarking forecasts set out in the adults improvement plan; and against the move towards both London (younger adults) and England (older adults) averages.</p> <p>Bettergov have been commissioned to help finalise dashboard and benchmarking modelling. 2 dashboards are to be</p>	<p>COMPLETE</p>	<p>Executive Director Adult Social Care to ensure accurate data incorporated into monthly Performance reporting.</p>

		<p>utilised one focused on activity which is complete and another on finances which is in development.</p> <p>The MTFS tracker is currently updated weekly.</p> <p>The Corporate Finance, Performance and Risk report draws upon this data and provides GPAC with the relevant information per this action.</p>		
--	--	---	--	--

Recommendation 2 – HIGH PRIORITY

The Council (including Cabinet and Scrutiny and Overview Committee) should challenge the adequacy of the reserves assessment which should include a risk assessment before approving the budget.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) Develop a reserves strategy as part of the Medium Term Financial Strategy (MTFS) and present it for approval with the Budget reports to Cabinet and Full Council. This needs to incorporate a clear assessment of risks and liabilities that demonstrate all current and future exposure has been thought through and factored into the recommendations. Strategy to map the financial governance process around agreeing additions to reserves to be included to reduce risk of duplication and that there were no gaps in approach.	February/March 2021	The MTFS and 21/22 Budget agreed on 8 th March contains a clear strategy for growing the reserves base up to a level which by 23/24 would give a general fund reserve in excess of £60 million	COMPLETE	Interim Director of Finance, Investment and Risk
ii) In considering future budget reports, Cabinet will assure itself that all risks and liabilities have been properly considered by requesting that the Scrutiny & Overview Committee and the General Purposes and Audit Committee review the adequacy of the strategy and its relationship to the MTFS prior to Cabinet taking a decision.	February/March 2021	From April 2021 Financial Monitoring reports will be provided to Cabinet on a monthly basis to ensure Members have increased oversight on any emerging pressures or movements. The 21/22 Budget was reported to Scrutiny on 16 th February 2021 and comments were verbally reported to cabinet on 8 th March 2021. Future year's timescales will need to include time for both this and reference to GPAC and Scrutiny	COMPLETE	Interim Director of Finance, Investment and Risk

<p>iii) Training to be delivered to relevant members to raise understanding of reserves</p>	<p>New Recommendation – May 2021</p>	<p>Cross reference to LBC rec 3 as this will form part of the wider Member Development Programme to be developed and agreed.</p> <p>A Training offer has been compiled referencing the RIPI to ensure aspects of the action plan are picked up. Following approval at the relevant Council meeting, action will quickly be taken to schedule and deliver training over the course of this financial year. Work is ongoing to approve the training offer, this is expected to be identified and arranged by the end of June at the latest.</p> <p>A further refreshed training programme for members will be prepared later in the year for 2022, to ensure members have a framework of learning to support Council decision-making.</p>	<p>May/June 2021</p>	<p>Director of HR/ Head of Democratic Services</p>
<p>iv) Council to identify the most appropriate mechanism for the Scrutiny & Overview Committee to monitor and assess progress made against delivering the budget throughout the year. As a part of this any update would need to provide reassurance that effective budget controls are in place to mitigate against potential pressures.</p>	<p>New Recommendation – June 2021</p>	<p>The Council has taken steps to give all members further regular insight into the status of its financial performance. For the 2021/22 financial year the Council will begin reporting to members on financial performance on the in year budget (first period report June 7th 2021).</p>	<p>June 2021</p> <p>First period updates now delivered and shared.</p>	<p>Interim Director of Finance, Investment and Risk</p>

<p>Furthermore, the Council is to consider approach to providing reassurance to Members that effective budget controls were in place to mitigate against potential risks to the delivery of the budget</p>		<p>This will be done via a new report structure, each month through the Cabinet process as opposed to the current quarterly process. These papers will be published for Scrutiny to review, call in and challenge where they feel appropriate.</p> <p>The Council has already implemented a number of controls to mitigate against potential budget risks. This includes the continued operation of our Spending Control Panel, existing budget tracker, the development of finance training to increase financial literacy in the Council and the ongoing work to improve our financial control system.</p> <p>A forensic financial audit has been commissioned to be finalised by end of June.</p>	<p>Updates are scheduled to come to Cabinet monthly. RIPI Quarterly updates will continue to comment and share progress on improvements to our financial monitoring.</p>	
--	--	--	--	--

Recommendation 3 – HIGH PRIORITY
 The Chief Executive should oversee a review of the outcomes achieved from the use of transformation funding to demonstrate that the funding has been applied in accordance with the aim of the scheme.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) A review of all schemes previously funded from transformation capital receipts be undertaken and a report produced that assesses whether the funding has been applied in accordance with the scheme.	January 2021	This work is completed following discussions with the external auditor. An update will be made to GPAC as part of the report on the 2019/20 accounts.	COMPLETE	Interim Director of Finance, Investment & Risk
ii) Training to be delivered to relevant members on transformation funding to raise understanding.	New Recommendation - May 2021	Cross reference to LBC rec 3 as this will form part of the wider Member Development Programme. A Training offer has been compiled referencing the RIPI to ensure aspects of the action plan are picked up. Following approval at the relevant Council meeting, action will quickly be taken to schedule and deliver training over the course of this financial year. Work is ongoing to approve the training offer, this is expected to be identified and arranged by the end of June at the latest.	May/June 2021	Interim Director of Finance, Investment and Risk Director of HR Head of Democratic Services

		A further refreshed training programme for members will be prepared later in the year for 2022, to ensure members have a framework of learning to support Council decision-making.		
--	--	--	--	--

Recommendation 4
The s151 officer should set out the strategy for applying capital receipts for transformation annually as part of the budget setting process.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal

Page 76

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) A strategy for funding transformation to be incorporated into the budget setting process using the current Ministry of Housing, Communities and Local Government (MHCLG) Flexible Use of Capital Receipts Scheme.	January 2021	Following extension of the Flexible Use of capital receipts scheme. Proposals for the use of up to £5 million of capital receipts, subject to availability of receipts will be drafted and agreed by ELT. This should be received in w/c 7 th June	COMPLETE	Interim Director of Finance, Investment & Risk
ii) In the absence of any national capital receipts for transformation scheme, the strategy for funding transformation will set out how future schemes will be funded using invest to save principles using rolling investment that is set aside and supported by business cases that demonstrate return. Any business case will have to demonstrate governance of the programme to assure the section 151 officer and Cabinet that the deliverables are being met.	February 2021	See 4i above.	COMPLETE	Interim Director of Finance, Investment & Risk

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

<p>All schemes approved for funding under this strategy will be assessed individually and against the overarching risk exposure and affordability for the Council.</p>				
<p>iii) There will be an annual report to the Scrutiny & Overview Committee and GPAC on the use of transformation funding and the delivery of schemes. A corporate strategy needs to be developed to assess future transformation projects prior to funding. This should include a requirement to identify the intended outcomes, risk exposure, ongoing affordability, how success will be measured, how progress will be tracked, and any interdependencies with other projects and any wider benefits.</p>	<p>December 2021</p>	<p>Report to be prepared at the end of each financial year from 21/22 onwards</p>	<p>June 2022</p>	<p>Interim Director of Finance, Investment & Risk</p>

Page 78

Recommendation 5
 The General Purposes and Audit Committee should receive reports on the actions being taken to address the Dedicated Schools Grant deficit and challenge whether sufficient progress is being made.

Cabinet Member Accountability: Councillor Flemming, Cabinet Member for Children, Young People and Learning

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) The Dedicated Schools Grant recovery plan should be presented to General Purposes and Audit Committee and Scrutiny and Overview Committee for review and agreement to ensure that it is adequate to meet objectives and timelines that have been set.	February 2021	Reviewed at GPAC 4 March 2021	COMPLETE	Interim Director of Education
ii) Special Educational Needs Finance Board to be established and chaired by the interim Director of Education to oversee the delivery of the Dedicated Schools Grant recovery plan.	COMPLETED October 2020	Initial meetings held with further meetings to be scheduled to update on the progress of the DSG recovery plan.	COMPLETE	Interim Director of Education
iii) Training to be provided to members to ensure the committee possess a working understand of education funding and budgets	New Recommendation	DSG training has been delivered to members of Scrutiny Committee, Labour Group and Conservative Group	COMPLETE	Interim Director of Education /Head of Learning &OD

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

<p>iv) Implement the ‘New Approach to Special Educational Needs delivery’ strategy working with schools to ensure that more of our Special Educational Needs pupils are educated in mainstream provision to include:</p> <ul style="list-style-type: none"> • Developing more capacity within the post-16 provision • Opening of new Special Educational Needs free schools 	<p>Early adopter Locality areas from September 2020</p> <p>Ongoing discussions with current provider (Croydon College) for 2020/21 academic year Opened September 2020 in temporary location and from September 2021 in substantive location</p>	<p>Report delivered to School’s Forum on Monday 26th April and full approval given to widen the project to two further locality areas.</p> <p>1% increase in CYP with an EHCP being educated in a Mainstream school.</p>	<p>Review June 2021</p>	<p>Interim Director of Education</p>
<p>v) Progress against the recovery plan to be included in the monthly budget monitoring report to Children’s, Families and Education Department Leadership Team, the Executive Leadership Team, the Children’s Improvement Board and the quarterly Cabinet, General Purposes and Audit Committee and Scrutiny & Overview Committee which will bring a greater level of control and transparency.</p>	<p>Quarter 3 report to Cabinet February 2021</p>	<p>Progress update included in the monthly budget monitoring to Education SLT and CFE DLT.</p>	<p>COMPLETE</p>	<p>Interim Executive Director, Children Families and Education Head of Finance - CFE</p>
<p>vi) Progress on Dedicated Schools Grant recovery plan to be reported to the Schools’ Forum on a termly basis</p>	<p>December 2020</p>	<p>Included in the forward plan of agenda items for Schools’ Forum</p>	<p>Complete and ongoing</p>	<p>Interim Head of Finance, Children, Families and Education</p>

Recommendation 6				
The Executive Director Children, Families and Education needs to review the services provided to UASC and to identify options to meet their needs within the grant funding provided by the Home Office.				
Cabinet Member Accountability: Councillor Flemming, Cabinet Member for Children, Young People and Learning				
Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) Complete a forensic review of grant income against the total expenditure for unaccompanied asylum seeking children and care leavers over the past 3 years, including the co-ordination of pan-London arrangements	December 2021	Review completed and is informing Council's approach to UASC support offer.	COMPLETE	Interim Head of Finance, Children, Families and Education
ii) Negotiate with the Home Office and Department for Education to secure the same financial support provided to other port of entry authorities such as Kent		Meetings have been held with senior officials in the Home Office and Department for Education,		Interim Executive Director, Children Families and Education

<p>and Portsmouth to cover the exceptional overhead costs caused by the volume of unaccompanied asylum seeking children received in the Borough.</p> <ul style="list-style-type: none"> • Full cost recovery for exceptional overheads provided by Croydon such as age assessments, the social care duty service at Lunar House and legal fees. Due to volumes in the Borough from its port of entry position, these cannot be absorbed within normal overhead cost as per all other local authorities. • Increased funding for children cared for over and above the voluntary national rate to match the funding of Croydon’s children in care. 	<p>Initial meeting had in November 2020</p>	<p>underpinned by forensic review and modelling of additional costs.</p> <p>Agreement of full cost recovery for the age assessment team and the Duty Team at Lunar House for one year. This will cover costs of approximately £595k per annum agreed over 2021-22</p> <p>A Cabinet report on the Council’s approach to UASC will be going to Cabinet in June 2021.</p>	<p>Ongoing – review for October 2021</p>	
<p>iii) Work with London local authorities to safely transfer responsibility for an agreed number of children in Croydon’s care to reduce disproportionate burden on Croydon.</p>	<p>Initial meeting held October 2020</p>	<p>Home Office Officials, Home Office and London Regional UASC Strategic Lead have secured agreement to the transfer of the care costs of 21 UASC to other London Councils.</p> <p>The Interim Chief Executive has written to all London Chief Executives to support the extension of the pan-London protocol to under 16 for a period of 3 months. 24 Councils have agreed to date.</p>	<p>Review June 2021</p>	<p>Interim Executive Director, Children Families and Education</p>
<p>iv) Introduce a needs based approach to withdrawing services to young people whose appeal rights are exhausted alongside earlier, robust triple planning as part of their pathway at 16 plus. This will assist and support a planned, safe voluntary return when all legal routes to remain have been exhausted and avoid a forced detention and removal when young people have no recourse to public funds, limited access to NHS and education and cannot work legally in UK.</p>	<p>December 2020</p>	<p>Feb 21 – 50 SW’s trained in HRA Assessment Practice. First 20 in cohort identified</p> <p>Since December 2020 have completed 29 Human Rights Assessments.</p>	<p>Review June 2021</p>	<p>Director Early Help and Children’s Social Care</p>

Recommendation 7
 The Executive Director Children, Families and Education needs to identify the capacity threshold for the numbers of UASC that it has the capacity to deliver safe UASC services to.

Cabinet Member Accountability: Councillor Flemming, Cabinet Member for Children, Young People and Learning

Page 82

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) Draw on the analysis and review at 6 (i) to develop options to establish a capacity threshold for Croydon for unaccompanied asylum seeking children that is commensurate with other Local Authorities and in line with the nationally agreed standards and funding.	December 2020	The voluntary national rate is the equivalent of 0.07% of the child population. In Croydon that equates to 66 children. This underpins the forensic review and modelling completed in 6i	COMPLETE	Interim Executive Director, Children Families and Education
ii) Present options for the Council to deliver safe services within the capacity threshold to the Children’s Improvement Board, Cabinet and General Purposes and Audit Committee and Scrutiny & Overview Committee to increase levels of control and improve transparency.	February 2021	A Cabinet paper on the Council’s approach to caring for UASC will be presented on June 7 th 2021.	COMPLETE	Interim Executive Director, Children Families and Education

Recommendation 8
 The Cabinet reports on the financial position need to improve the transparency of reporting of any remedial action taken to address in year overspends.

Cabinet Member Accountability: Councillor Young, Cabinet Member for Resources and Financial Governance and Councillor King, Cabinet Member for Croydon Renewal

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
Page 83 i) A review of financial reporting best practice is to be undertaken and the results used to design reports and a system of reporting that will improve its approach to managing finance, performance and risk to introduce a greater level of transparency and better grip of expenditure. All departments will be required to report against their budgets to the Departmental and Executive Leadership Teams on a monthly basis.	September 2021	A process for monthly reporting is being developed with the period 1 report to come to Cabinet June 7 th 2021. These reports will develop iteratively over the coming months. See recommendation 8 – ii for further information on performance monitoring.	COMPLETE	Interim Director of Finance, Investment & Risk
ii) The Council will develop a new corporate framework for monthly reporting that includes finance, performance and risk. This will report to the Executive Leadership Team, Cabinet, General Purposes and Audit Committee and Scrutiny and Overview Committee as appropriate.	April 2021	The Council has developed a new Corporate framework to deliver monthly Corporate Finance, Performance and Risk update reports. These monitor implementation of improvement	COMPLETE – first iteration of report now developed and shared.	Interim Chief Executive

<p>The new framework will include progress against service delivery, departmental actions plans, savings opportunities and actions contained within the Croydon Renewal Plan. All actions will be assigned to accountable people (including relevant cabinet member) and will be tracked through a central reporting team to ensure that the process is joined up, consistent and timely. This will be a recognised Programme Management Office function using savings and actions trackers</p>		<p>actions across the Council (including those contained in the RIPI and as part of the CRP) and set out KPIs and accountable officers.</p> <p>The PMO presented an approach to monthly Corporate, Finance, Performance Risk Reporting to Cabinet on April 12th.</p> <p>The June 7th Corporate Finance, performance & Risk report iteration will provide a final set of CRP measures, and targets set to date, as well as a further update on the work streams in place to produce a full set of corporate performance reports by September 2021 Cabinet.</p> <p>The monthly reports will develop over time as recommendations are progressed.</p>	<p>updates are scheduled to come to Cabinet monthly</p>	
<p>iii) A review of the capacity within the Finance Team to ensure there is adequate support for departmental cost centre managers to fulfil their responsibilities as budget holders.</p>	<p>November 2020 (update to May 2021)</p>	<p>A proposed structure for the finance team to ensure the service has the right support for departmental cost centre managers was developed in November 2020.</p> <p>This will be reviewed as part of the financial forensic audit which is due to be finalised at the end of June.</p>	<p>Review June 2021</p>	<p>Interim Director of Finance, Investment & Risk</p>

Recommendation 9 – HIGH PRIORITY				
The Council (including Cabinet and Scrutiny and Overview Committee) need to show greater rigor in challenging underlying assumptions before approving the budget including understanding the track record of savings delivery.				
Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal/ Callton Young, Cabinet Member for Resources and Financial Governance				
Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) To support the Annual Budget setting process Budget Development Meetings will be held for each department and will be attended by Executive Directors, Corporate Leadership Team and Members with accountability for their service area and staff who are responsible for service delivery that understand what impact growth and savings plans will have on the services. To support this process Members will be provided with a clear set of proposals that demonstrate cost pressures (growth) and savings opportunities with narrative and comparators on budget and outcomes delivered to describe the impact of the decisions that are required to be taken.	October / November 2020	Proposals were provided to members with a formal decision in November Cabinet. Saving opportunities for 21/22 were set out across all services and have been incorporated into delivery of Croydon Renewal Plan. The Council recognises further savings will be necessary to achieve a sustainable budget in the long term. Discussions for further savings next year will be scheduled starting from April 2021.	COMPLETE	Interim Director of Finance, Investment & Risk
ii) To support the budget exercise the Council will seek external support to test the draft budget proposals,	December 2020	Various support from external sources has been utilised to date to offer capacity and advice. This	COMPLETE	Interim Director of Finance, Investment & Risk

Page 85

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

<p>seek ideas and good practice and will take the same approach by seeking support for the scrutiny process.</p>		<p>includes the LGA, Council peers and CIPFA. The Council will continue to use such opportunities moving forward.</p>		
<p>iii) Develop a budget savings tracker that profiles savings by month to enable Members to track that savings are on target. This will need to correlate with the finance, performance and risk reporting that Council will introduce.</p>	<p>January 2021</p>	<p>An in year savings tracker has been developed to monitor identified savings and escalate any delivery challenges. In year savings are rag rated based on confidence in delivery.</p>	<p>COMPLETE</p>	<p>Interim Director of Finance, Investment & Risk</p>
<p>iv) To increase understanding of the choices Cabinet Members are making with regards to the emerging budget and to effectively challenge budget assumptions, Scrutiny and Overview Committee Members to receive regular briefings on the progress of budget setting.</p>	<p>January 2021</p>	<p>Budget Discussions were conducted across January and February 2021. This included focused discussion on the 21/22 budget for specific directorates. Discussion took place at Children and Young People Sub-Committee, Health & Social Care Sub-Committee, at Scrutiny, Streets, Environment & Homes sub-committee and finally the Scrutiny & Overview Committee.</p> <p>The Council will continue to keep Scrutiny committees sighted on budget matters.</p>	<p>COMPLETE</p>	<p>Interim Director of Finance, Investment & Risk</p>
<p>v) To review the budget setting-timetable to ensure that the Scrutiny & Overview Committee has the time to digest and review the budget proposals and underlying assumptions and for Cabinet to respond fully to any challenge or comments and for Cabinet to be able to consider changing its proposals.</p>	<p>April 2021</p>	<p>The Council is taking action to ensure budget discussions happen at an earlier date and more opportunities are offered to members to offer input into the budget and review its management. These actions include finalisation of Council meetings forward plan up until April 2022 with dates marked for policy</p>	<p>COMPLETE</p>	<p>Interim Director of Finance, Investment & Risk</p>

		<p>discussions and monthly financial performance updates at Cabinet.</p> <p>Additionally, budget developments meetings will begin in Spring 2021 as opposed to Autumn meaning savings will be identified and shared with members earlier in year.</p>		
--	--	---	--	--

Recommendation 10

The General Purposes and Audit Committee must challenge officers on the progress in implementing the Financial Consultant’s recommendations to improve the budget setting, monitoring and reporting process and actions to address the Head of Internal Audit’s concerns on internal controls.

Member Accountability: Councillor Karen Jewitt, Chair of General Purposes and Audit Committee

Page 87

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
<p>(j) Delivery of the Financial Consultant’s recommendations and the Head of Internal Audit’s concerns will be reported to the General Purposes and Audit Committee and to the Improvement Board as part of the Croydon Renewal Plan.</p>	<p>October 2020</p> <p>Update to be provided in June 2021</p>	<p>Phase 1 of the review have been established and the work on the 75 recommendations in the initial review is ongoing. A progress update on the implementation of these recommendations went to GPAC in April. This included notice on completion of the Capital Programme review, Updated MTFS and new financial governance arrangements.</p> <p>Further updates on these will be presented to GPAC, with a date set for September.</p>	<p>Review June 2021 –ongoing</p> <p>The next update on the Finance Review is scheduled for GPAC September 2021</p>	<p>Interim Director of Finance, Investment & Risk</p>

		<p>In March ELT agreed a renewed Internal Audit Governance Framework. The agreed framework states the Head of internal Audit is to regularly prepare reports for DLTs and ELT (4 times a year for each) to ensure visibility on existing concerns and mitigating actions in place,</p> <p>The Head of Internal Audit is regularly attending GPAC and can use the meeting as an opportunity to provide updates on concerns and the management actions being delivered to address the concerns.</p>		
<p>ii) That a piece of work be undertaken to clarify the roles of GPAC and Scrutiny to reduce duplication and ensure right things are being reviewed at the right time</p>	<p>New Recommendation</p>	<p>Updates on phase 1 of the Finance Review are currently scheduled on the GPAC work plan up until September including updates on phase 1. It is suggested that it remain this way but Scrutiny call in as they feel appropriate to ensure correct level of challenge.</p> <p>Phase 2 and 3 of the finance review have been paused to prioritise other pieces of work.</p>	<p>September 2021</p>	<p>Interim Executive Director of Resources</p> <p>Interim Director of Finance, Investment & Risk</p>

Recommendation 11
 The s151 officer needs to revisit the Growth Zone assumptions following the pandemic and make recommendations to Cabinet and Council for the continued investment in the scheme.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal

Page 88

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) The Council have commissioned PwC to undertake a strategic review of the Growth Zone with completion expected November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	December 2020	PwC report to cabinet made recommendations on future of GZ. These are now being implemented	COMPLETE	Interim Director of Finance, Investment & Risk
ii) Revised financial model profile to be presented alongside budget review in February 2021 to Cabinet, General Purposes and Audit Committee and the Scrutiny and Overview Committee.	February 2021	The March cabinet report sets out a direction of travel, with 1 year of capital expenditure. Considering the current macro-economic climate (i.e. impact of pandemic) and challenges facing Croydon and its economy, this means that the financial model will need updating throughout this calendar year. Dates for GPAC and	Progressed – further update December 2021	Interim Director of Finance, Investment & Risk

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

		Scrutiny & Overview Committee are being scheduled. An update on the report will go to Cabinet in December 2021.		
iii) Cabinet paper with revised profile and recommendations to be issued March 2021.	March 2021	See 11ii	COMPLETE	Interim Director of Finance, Investment & Risk
iv) The Council needs a mechanism in place to review projects to use the learning to inform any future work. This should be extended across all areas of the Council, with learning retained centrally as a corporate resources.	New recommendation	Project closure process in place as part of the governance of all projects.	COMPLETE	Interim Director of Finance, Investment & Risk

Recommendation 12 – HIGH PRIORITY

The s151 officer should review the financial rationale and associated risks and make recommendations to Cabinet and Council on whether the Revolving Investment Fund should continue.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) The Council have commissioned PwC to undertake a strategic review of the Revolving Investment Fund with completion expected in November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	December 2020	Report by PwC on governance & strategic review delivered in November 2020 to Cabinet. Treasury Management strategy updated 1st March 2021 limits new lending under the RIF to BBB working capital loans only	COMPLETE	Interim Director of Finance, Investment & Risk
ii) Recommendations to be presented alongside budget review in Feb 2021 to Cabinet, General Purposes and Audit Committee and Scrutiny and Overview	February 2021	See recommendation 12i	COMPLETE	Interim Director of Finance, Investment & Risk
iii) Cabinet paper with recommendations to be issued March 2021.	March 2021	See recommendation 12i	COMPLETE	Interim Director of Finance, Investment & Risk

Recommendation 13
 The s151 officer should review the purchase of Croydon Park Hotel to identify lessons learned to strengthen future due diligence arrangements.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal

Page 91

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) The Council have commissioned PWC to undertake a strategic review of assets that have been purchased with completion expected in November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	December 2020	On February 18 th Cabinet agreed the approach set out in the Interim Assets Strategy. This included, in the appendices, options for an approach on the future of Croydon Park Hotel. An update with a decision on the future of Croydon Park Hotel is provisionally scheduled for September 2021.	COMPLETE	Interim Director of Finance, Investment & Risk
ii) Recommendations, including lessons learned, will inform changes required to governance arrangements and training/development that might be required. These recommendations to be presented alongside budget review in February 2021 to Cabinet, General Purposes and Audit Committee and Scrutiny and Overview.	January 2021	Under Treasury management strategy changes no new investments will be made. Lessons learned paper to be prepared.	September 2021	Interim Director of Finance, Investment & Risk

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

iii) Review and re-write the asset investment strategy that was approved by Cabinet in October 2018 incorporating advice from each of the Strategic Reviews. The review will explicitly consider best practice from the sector and lessons learned from other local authorities, the external auditor and the National Audit Office on effective investment practice.	March 2021	Interim Asset Strategy has been approved at February 18 th Cabinet to fast track income generation and achieve “quick wins.” A 3 year 21-24 Asset Strategy is being developed provisionally set for January 2022 Cabinet.	COMPLETE	Interim Director of Finance, Investment & Risk / Executive Director of Place
iv) Cabinet paper with recommendations to be issued March 2021. Update to be provided at Scrutiny on 9 th February	March 2021	The Interim Assets Disposal Strategy, was discussed at both Cabinet and Scrutiny & Overview Committee in February.	COMPLETE	Interim Director of Finance, Investment & Risk

Recommendation 14 – HIGH PRIORITY

The Cabinet and Council needs to re-consider the Treasury Management Strategy for ongoing affordability of the borrowing strategy, the associated risks and identify whether alternative options can reduce the financial burden.

Cabinet Member Accountability: Councillor Young, Cabinet Member for Resources and Financial Governance and Councillor King, Cabinet Member for Croydon Renewal

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) The Treasury Management Strategy will be reviewed as part of the budget setting for 2021/22 and will take into consideration the outcome of the strategic reviews to factor in the overall financial position and best practice from other local authorities. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	February 2021	Treasury Management strategy updated and agreed by Council on 8 th March 2021	COMPLETE	Interim Director of Finance, Investment & Risk
ii) The outcome of the strategic reviews that the Council have commissioned will inform the Treasury Management Strategy for 21/22 onwards and any changes in governance that may be required.	February 2021	See recommendation 14i	COMPLETE	Interim Director of Finance, Investment & Risk

Recommendation 15
 The Chief Executive should arrange detailed Treasury Management training to assist Members to better understand and challenge the long-term financial implications of matters reported within the Treasury Management Strategy.

Cabinet Member Accountability: Councillor Young Cabinet Member for Resources and Financial Governance

Page 93

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) Members to attend training sessions facilitated by the Local Government Association to cover treasury management to enable better and effective financial leadership.	January 2021	Treasury management training was offered to all members on the 3 rd March 2021. Session was recorded and will be distributed to all Members and all budget managers.	COMPLETE	Interim Chief Executive

Recommendation 16
 The s151 officer should revisit the Minimum Revenue Provision policy to demonstrate that a prudent approach is being taken.

Cabinet Member Accountability: Councillor King Cabinet Member for Croydon Renewal

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) Link Asset Management has been commissioned to carry out a review of the Minimum Revenue Position policy. The report with recommendations will be discussed with General Purposes and Audit Committee and then on to Cabinet.	December 2020	Minimum Revenue Provision Policy Statement 2020/21 went to Cabinet 1 st March as part of the Treasury Management Strategy.	COMPLETE	Interim Director of Finance, Investment & Risk

page 94

Recommendation 17
 The Cabinet and Council should reconsider the financial business case for continuing to invest in Brick by Brick before agreeing any further borrowing.

Cabinet Member Accountability: Councillor Hamida Ali, Leader of the Council

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) PwC has been commissioned to undertake a strategic review of Brick by Brick with completion expected in November 2020. The report with recommendations regarding the financial business case will be reviewed by the Scrutiny and Overview Committee prior to being presented to Cabinet.	December 2020 (updated to May 2021)	<p>This specific action is complete however, ongoing activity with regard to BBB still needs to be taken hence further updates suggested.</p> <p>Phase 1 of the Strategic Review set out a number of options around BBB. This was received at Cabinet in November 2020 and it was agreed by members for further work to be carried out to advice on the best approach for BBB.</p> <p>The additional paper went to Cabinet in February 2021. It recommended an approach to build out of sites by Brick by Brick combined with a sale of sites under construction whilst still considering</p>	Progressed - Next Update in September 2021	Interim Chief Executive

		<p>the option of a sale of the business, with a further report to Cabinet in June 2021.</p> <p>A further progress report was provided May 17th Cabinet 2021. Further reports including a decision on BBB's future are provisionally scheduled for July Cabinet.</p>		
<p>ii) Council to review the risks relating to Brick by Brick to ensure they are appropriately listed on the risk register</p>	<p>New Recommendation</p>	<p>The Risks for Brick by Brick have been reviewed and are as follows per the Corporate Risk Register:</p> <ol style="list-style-type: none"> 1. Investigation or ownership taken on all activities that the Council undertakes by the Executive Leadership Team, Cabinet and all Scrutiny Committees (including GPAC). 2. There is no effective challenge, review, investigation or ownership taken on all activities that the Council undertakes by the Executive Leadership Team, Cabinet and all Scrutiny Committees (including GPAC). <p>**These risks specifically relate to financial strategy, treasury management strategy (including borrowing), capital investment strategies and appropriateness of</p>	<p>COMPLETE</p>	<p>Interim Director of Finance, Investment & Risk</p>

		<p>continuing investment and association with BBB**</p> <p>The Corporate Red Risk Register is reviewed monthly at ELT to review and update risks where necessary.</p>		
--	--	---	--	--

Recommendation 18 – HIGH PRIORITY

The Cabinet and Council should review and reconsider the ongoing financial rationale for the Council in the equity investment arrangement with Brick by Brick.

Cabinet Member Accountability: Councillor King Cabinet Member for Croydon Renewal

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
<p>i) PwC has been commissioned to undertake a strategic review of Brick by Brick. The report and recommendations will consider the ongoing financial rationale and equity invested and will detail options for the Council that will be considered by the Scrutiny & Overview Committee Cabinet prior to being presented to Cabinet.</p>	<p>December 2020</p>	<p>This paper went to Scrutiny & Overview Committee and Cabinet in February 2021.</p> <p>The Cabinet paper noted that the Council has never made any equity payments, as planned, and is not in the financial position to do so. It was noted BBB sales proceeds were meant to be placed in an account for the Council to apply interest repayment and, if excess, to substantive loan repayment. Unfortunately, this process has not occurred and instead sale proceeds were retained by BBB effectively replacing the Council’s equity share.</p> <p>The Council needs to review existing arrangement, change the current</p>	<p>COMPLETE</p>	<p>Interim Chief Executive</p>

		<p>agreements or replace it with fresh loans.</p> <p>It is recommended that the current arrangements continue but in a modified way to give Brick by Brick capacity to have working capital to ensure that funds are available to build out units on site</p>		
--	--	---	--	--

Recommendation 19
 The s151 officer and monitoring officer should monitor compliance with loan covenants with Brick by Brick and report any breaches to Members.

Cabinet Member Accountability: Councillor King Cabinet Member for Croydon Renewal

Page 98

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
<p>i) Loan covenants are within scope of the PwC strategic review and will be considered as part of the overall recommendations.</p> <p>A review of the existing loan covenants and their governance is to be undertaken. Learning from this review, a new system of control for all loan agreements entered into by the Council will be presented to Members and this will form part of the new Corporate Finance, Performance and Risk reporting system.</p> <p>The review and the proposed new system for loan covenants will be presented to GPAC & Scrutiny and Overview Committee prior to being presented to Cabinet for approval.</p>	<p>January 2021</p>	<p>Loan agreements to be redrafted to provide a comprehensive single agreement</p> <p>The February Cabinet report agreed that detail of the revised loan scheme be delegated to the Chief Executive after consultation with the leader and appropriate lead members.</p>	<p>COMPLETE</p>	<p>Interim Executive Director of Resources</p> <p>Interim Director of Finance, Investment & Risk</p>

--	--	--	--	--

Recommendation 20 – HIGH PRIORITY
 The Cabinet and Council should review its arrangements to govern its interest in subsidiaries, how the subsidiaries are linked, and the long-term impact of the subsidiaries on the Council’s financial position and how the Council’s and taxpayers’ interest is safeguarded.

Cabinet Member Accountability: Councillor Young, Cabinet Member for Resources and Financial Governance

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) An audit of the Council’s approach to membership of each subsidiary board will be undertaken. The audit will involve officers of the Council and any Chairs/Members of company boards.	March 2021	<p>A working group has now been established with Legal and Finance to work through the existing list of companies that the Council has an interest in. Checks are also being undertaken to ensure that this list is as complete as possible.</p> <p>The group has been operating since April 2021 and is currently established as a task and finish group undertaking work around the governance process, directorships, status and relationship with its third party companies as well as assist in elements of the wider asset management review. Relevant officers and Directors of company boards are invited to present a paper at each of the working group</p>	<p>Update to be provided June 2021</p> <p>(A further update will come through September 2021)</p>	<p>Interim Executive Director of Resources</p> <p>Interim Director of Finance</p>

		meetings to discuss the company/companies they are involved with.		
ii) As part of this review the membership balance of the boards will be considered in aggregate in regard to best practice for achieving diversity, skill set, sectoral knowledge and Croydon Council representation.	March 2021	At present, the working group has been established as a task and finish group in order to undertake the audit exercise described above and consider future governance for onward recommendation. The working group has been comprised of legal and finance so that any immediate financial or legal risks can be addressed as soon as possible. The recommendations for future governance is already underway and will consider (ii).	Update to be provided June 2021 (A further update will come through September 2021)	Interim Executive Director of Resources Interim Director of Finance
iii) External guidance on best practice will be sought. Roles, responsibilities and legal requirements for local authority company directors and guidance on skill set will be sought and this will include the best way to assess the competence of Members and Chief Officers for these roles.	March 2021	This will be considered as part of the future governance recommendations.	Update to be provided June 2021 (A further update will come through September 2021)	Interim Executive Director of Resources Interim Director of Finance
iv) Process for identifying gaps in knowledge and or experience will be brought forward to include training considerations. If necessary interim arrangements will be made to remove risks and ensure effective governance.	March 2021	This will be considered as part of the future governance recommendations.	Update to be provided June 2021 (A further update will come through September 2021)	Interim Executive Director of Resources Interim Director of Finance

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

<p>v) Essential mandatory training will be undertaken on an annual basis and the retention of the director role for each Councillor and Council official will rely on completion of the recommended training.</p>	<p>March 2021</p>	<p>This will be considered as part of the future governance recommendations.</p>	<p>Update to be provided June 2021 (A further update will come through September 2021)</p>	<p>Interim Executive Director of Resources Interim Director of Finance</p>
<p>vi) The impact of these changes will need to be reflected in the Council's Constitution and relevant protocols.</p>	<p>March 2021</p>	<p>This will be considered as part of the future governance recommendations.</p>	<p>Update provided June 2021 (A further update will come through September 2021)</p>	<p>Interim Executive Director of Resources Interim Director of Finance</p>
<p>vii) Support for the effective governance of the Council's subsidiaries and retaining a corporate overview of activity of individual companies and the whole group of companies is to be developed.</p>	<p>March 2021</p>	<p>This will be considered as part of the future governance recommendations.</p>	<p>Update provided June 2021 (A further update will come through September 2021)</p>	<p>Interim Executive Director of Resources Interim Director of Finance</p>
<p>Viii) Raise awareness of the timing of the Annual General Meetings of subsidiaries amongst Members.</p>	<p>New Recommendation</p>	<p>This will be considered as part of the future governance recommendations.</p>	<p>Update provided June 2021 (A further update will come through September 2021)</p>	<p>Interim Executive Director of Resources Interim Director of Finance</p>

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

<p>IX) Cost effective mechanism to publish Board membership of Council subsidiaries to be investigated</p>	<p>New Recommendation</p>	<p>This will be considered as part of the future governance recommendations.</p>	<p>Update t provided June 2021 (A further update will come through September 2021)</p>	<p>Interim Executive Director of Resources Interim Director of Finance</p>
--	---------------------------	--	---	---

LBC Recommendation 1
 Given the challenges ahead there will need to be improvement of the Council’s approach to risk management to enable a satisfactory turnaround of the financial position.

Cabinet Member Accountability: Councillor King Cabinet Member for Croydon Renewal

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) An externally led review of the Council’s appetite for risk needs to be undertaken with Members and Officers to ensure that the council’s financial capacity for managing risk is fully understood.	January 2021	Cabinet risk management session has been carried out which will need to have a follow up session during the 21/22 financial year. A similar exercise for Corporate Management team to be developed.	Sept 2021	Interim Director of Finance, Investment & Risk Director of HR Head of Democratic Services
ii) Corporate Finance, Performance and Risk management to be combined into one reporting function to remove silo thinking and increase the rigour to enable delivery of services, savings plans and the overarching Improvement Plan. This will require one new unified system of corporate reporting.	February 2021	PMO developing initial Corporate Finance, Performance and Risk report. These reports will be developed monthly and will provide updates from across the Council on key KPIs. A Cabinet report on the process of reporting was provided on April 12 th 2021. The June 7 th Corporate Finance, performance & Risk report iteration will provide a final set of CRP measures, and targets set to date, as well as a further update on the work streams in place to produce a full set of corporate performance reports by September 2021 Cabinet.	COMPLETE	Interim Executive Director of Resources

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

		The monthly reports will develop over time as recommendations are progressed.		
iii) Risk considerations to be made at the outset of all new decisions will ensure the Council has capacity, capability and financial resources needed to deliver. The assessment of risk is on the individual decision and its impact on the whole of the Council.	November 2020	All new programmes of work will be subject to sign off at the Programme Steering Group who will be able to provide a council wide view and ensure that risks have been considered. This process is in evolutionary phase so too soon to record as complete.	Sept 2021	All Executive Directors
iv) Develop training for Members and Officers to understand effective risk management.	January 2021 (updated to May 2021)	<p>Cross reference to LBC rec 3 as this will form part of the wider Member Development Programme.</p> <p>A training offer has been compiled referencing the RIPI to ensure aspects of the action plan are picked up. Following approval at the relevant Council meeting, action will quickly be taken to schedule and deliver training over the course of this financial year. Work is ongoing to approve the training offer, this is expected to be identified and arranged by the end of June at the latest.</p> <p>A further refreshed training programme for members will be prepared later in the year for</p>	June 2021	<p>Interim Director of Finance</p> <p>Director of HR</p> <p>Head of Democratic Services</p>

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

		2022, to ensure members have a framework of learning to support Council decision-making.		
v) The Council to review the terms of reference in regards the General Purposes and Audit Committee and Scrutiny & Overview Committee with regards to risk management to ensure there are no gaps in governance, to remove silo thinking and that both committees have a clear understanding of their responsibilities. This will include new guidance and joint training	March 2021	This is part of the review undertaken by Centre for Governance & Scrutiny to identify gaps in governance.	June 2021	Interim Executive Director of Resources
vi) Councillors to be provided overview of Council risk function and how risks are constantly monitored and updated in the organisation	New Recommendation	Cabinet training workshop took place in January 2021. The action is complete therefore but will need to be developed further to ensure that proper attention to changing financial position is considered throughout the year. Officers will look at opportunities to provide key learning to members through refreshed work programme for 2022.	COMPLETE	Interim Executive Director of Resources

LBC Recommendation 2				
Clarifying member and officer roles to support good governance arrangements				
Cabinet Member Accountability: Councillor Young Cabinet Member for Resources and Financial Governance				
Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) The Council will need to undertake a review to consider its operating model to ensure it has capacity and specialist skills required to deliver the financial and operational improvements that are needed to deliver.	February 2021	The Interim Chief Executive has begun a consultation on the management arrangements for the council which is paused but due to recommence in near future.	September 2021	Interim Chief Executive
ii) The Member/Officer protocol is to be reviewed to ensure that it gives clarity on the respective roles and responsibilities for both Members and officers. The protocol should also explicitly place the seven principles of public life, known as the Nolan principles, at its heart. https://www.gov.uk/government/publications/the-7-principles-of-public-life . Training will be held for all Councillors and senior officers to develop good practice.	March 2021	On May 26 th a report reviewing the TOR of Ethics Committee went to the Committee and consequently a new work plan was adopted. A Training offer has been developed for all members including where appropriate, specific training for committee members. Following approval at the relevant Council meeting, action will quickly be taken to schedule and deliver training over the course of this financial year. Work is ongoing to approve the training offer, this is expected to be identified and arranged by the end of June at the latest.	Update on progress in June 2021	Interim Executive Director of Resources Head of Democratic Services

Page 106

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

<p>iii) A review of the member and officer Codes of Conduct will be undertaken to incorporate any learning from recent events and to ensure that they explicitly include the seven principles of public life, known as the Nolan principles, as the basis of the ethical standards expected of elected and appointed public office holders.</p>	<p>March 2021</p>	<p>The Local Government Association Code of Conduct 2020 was reported into Ethics Committee in February 2021. Members asked for a gap analysis to come back to the committee in April to inform any potential future changes.</p> <p>This Gaps Analysis was provided to Councillors at the May 26th Ethics Committee.</p> <p>This is linked to LBC2 - ii.</p>	<p>COMPLETE</p>	<p>Interim Executive Director of Resources</p>
<p>iv) Development sessions for Members and officers to better understand each other's respective roles.</p>	<p>March 2021</p>	<p>See LBC Recommendation 2 ii and iii.</p>	<p>June 2021</p>	<p>Interim Executive Director of Resources</p>
<p>v) Review the level of support and advice Scrutiny & Overview Committee and the General Purposes and Audit Committee receives from the Head of Paid Services, Section 151 Officer and Monitoring Officer to ensure that the advice is in line with their statutory responsibilities. With this include clarification on the ability and process for members to request information.</p>	<p>March 2021</p>	<p>Meetings have been held between the Head of Paid Service, S151 officer, Monitoring Officer and Scrutiny Chairs to provide opportunity for regular discussion and planning.</p> <p>The Scrutiny and GPAC Workplan is being are also being linked in to the Council's forward plan.</p> <p>On the 30th March the Centre for Governance and Scrutiny presented</p>	<p>April 2021 – Action progressed</p> <p>Further update to be provided September 2021</p>	<p>Interim Executive Director of Resources</p>

		<p>a Scrutiny Improvement Review to the Scrutiny & Overview committee.</p> <p>An Information Sharing Protocol has been at Ethics Committee on the 26th May to set out clearly what information Councillors can access and how.</p> <p>The CFGS is supporting the Council to benchmark and identify how GPAC can be developed to strengthen its role in the Council's governance.</p>		
<p>vi) Review the capacity of the organisation to support the Scrutiny & Overview Committee and the General Purposes and Audit Committee so that activity is prioritised within the financial resources for these functions.</p>	<p>Commenced October 2020</p>	<p>This needs to be considered in conjunction with LBC Recommendation 2 V. See above therefore.</p>	<p>April 2021 – Action progressed</p> <p>Further update to be provided September 2021</p>	<p>Interim Executive Director Resources</p>

LBC Recommendation 3
 Ensuring that Members are appropriately trained across all aspects of the Council’s financial duties and responsibilities

Cabinet Member Accountability: Councillor Young, Cabinet Member for Resources and Financial Governance

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) A detailed training and development programme is being designed to enable all Members to fulfil their roles in regard to their role with sufficient rigour. The programme being developed will cover: <ul style="list-style-type: none"> • Financial management to include the importance of effective budget setting, a robust Medium Term Financial Strategy and rigorous budget monitoring (Add reserves) • Understanding funding sources, eg general fund, housing revenue account and direct schools grant • The role of Audit and the external auditor • Treasury management and capital strategies and the Council’s approach to subsidiaries • Risk assessment • Commercial Investment • Mentoring • Commissioning and Procurement Process • ASC Budget • Transformation Funding • Statutory and non-statutory services 	December 2020	A Training offer has been developed for all members including where appropriate, specific training for committee members. Following approval at the relevant Council meeting, action will quickly be taken to schedule and deliver training over the course of this financial year. Work is ongoing to approve the training offer, this is expected to be identified and arranged by the end of June at the latest. Some training has been carried out during the latter part of 2020 early 2021. This includes Finance, Treasury Management, Risk but this needs to form part of a wider programme of work that is being drawn up for agreement with Members. The Council will need to consider how it reports against attendance and records training on Mod.gov. A further refreshed training programme for members will be prepared later in the year for	Training offer Through relevant approval route latest June 2021 Further update to be provided September 2021	Interim Chief Executive Interim Executive Director of Resources Director of HR Head of Democratic Services

		2022, to ensure members have a framework of learning to support Council decision-making.			
ii)	Further work on Cabinet development will be undertaken to support members to explore priorities for the new Cabinet, agree how the Members will work together to make the most of shared skills and consider individual and collective leadership styles and ways of working.	January 2021	LGA have carried out a facilitated session for Cabinet members	COMPLETE	Interim Executive Director of Resources
iii)	<p>Target support to be provided for Cabinet Members, Scrutiny & Overview Committee Members and General Purposes and Audit Committee Members to strengthen the approach to reviewing the emerging plans, actions and risks that are being developed as part of the Croydon Renewal Plan, Financial recovery and progress against the Report in the Public Interest. In particular the training will include:</p> <ul style="list-style-type: none"> • The role of Scrutiny and Overview in relation to finance and General Purposes and Audit Committee • Developing an effective culture of scrutiny and key questioning skills • Maintaining a ‘big picture’ view of the financial pressures affecting the council • Assessing effectively budget and financial plans, budget monitoring, reserves approach • Challenging how resources are allocated • Scrutinising partnership arrangements • Key finance issues for Scrutiny and Overview Committee to consider 	December 2020	<p>An information Sharing Protocol has been written and provided to the Ethics Committee on the 26th may 2021 setting out clear guidelines for members to attain information.</p> <p>A Training offer has been developed for all members including where appropriate, specific training for committee members. Following approval at the relevant Council meeting, action will quickly be taken to schedule and deliver training over the course of this financial year. Work is ongoing to approve the training offer, this is expected to be identified and arranged by the end of June at the latest.</p>	Progressed – Further Updates to be provided Quarterly	Interim Executive Director of Resources

LBC Recommendation 4				
The Council develops an improvement programme that has the necessary elements for it to function effectively and within its financial resource.				
Cabinet Member Accountability: Councillor Hamida Ali, Leader of the Council				
Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) Implement new Council management arrangements that ensure: <ul style="list-style-type: none"> • the delivery of high quality statutory services • finances are appropriately managed and controlled • a sound understanding of risk management is at the heart of the organisation 	April 2021	<ul style="list-style-type: none"> • Process for Monthly finance updates established and to be implemented • £1m investment for additional capacity in Finance. • Risk Review • Corporate management restructure (to be re-commenced in near future) • Council meeting Ecosystem in process of being reviewed • Financial Control System developing • Priorities outlined to be achieved by September 2021. • Interim Assets Strategy delivered 	Update on next phase of work September 2021	Interim Chief Executive Officer
ii) Working with local residents, rebuild the trust with their local Council by focussing on effective delivery of core services, responding promptly and appropriately to queries and complaints and learning from good practice as well as failures and from each other.	April 2021	A Cabinet paper on Croydon Renewal Community Engagement to establish a Community Panel went to May Cabinet with operating principles and outcomes defined. The Panel is seen as a key element on our journey to becoming more transparent, open and honest in our ways of working.	Ongoing – To be updated every quarter	Interim Executive Director of Resources

		<p>The Panel will also represent a link between our communities and the delivery of the wider Croydon Renewal Improvement Plan.</p> <p>Rebuilding trust with residents will be an ongoing process with residents as we improve our cultures and systems to be the Council our resident’s needs. An update will continue to be provided against this action for the foreseeable future therefore.</p>			
iii)	<p>Introduce a new system of internal control focussed on finance, performance and risk to manage financial expenditure, risk management, service performance and the delivery of Council priorities. This will follow a monthly cycle of Departmental Leadership Teams, Executive Leadership Team, Cabinet and Scrutiny & Overview as appropriate.</p>	<p>April 2021</p>	<p>The Council is accelerating work to deliver a renewed financial control system and a review and refresh of our internal meetings structure. Work on these is ongoing with delivery and full compliance by staff expected in September 2021.</p> <p>The Council has already developed processes that will ensure monthly reporting on its financial performance and on Corporate Finance, Performance and Risk.</p>	<p>Next Update September 2021</p>	<p>Interim Chief Executive Officer</p>
iv)	<p>Building on the work done to date and listening to staff concerns about equality and diversity in the workplace, co-create a working environment that respects and values all our staff and take positive action to ensure that this is the case.</p>	<p>April 2021</p>	<p>The Council has launched a Guardians Programme in order to provide its staff a safe space to share concerns and have conversations around working issues</p>	<p>Ongoing – To be updated every quarter</p>	<p>Interim Executive Director of Resources Director of HR</p>

		<p>including potential problems related to bullying or discrimination.</p> <p>The Leader & Interim CEO have participated in roadshows/staff engagement sessions attended by several hundred staff not only to share corporate priorities but to hear directly from staff on their views and experiences.</p> <p>The Council held a whole staff conference in March, to initiate such staff engagement and to start to create a working environment where staff are listened to and involved in priority setting process. The Council recognises it will take time to build staff trust and confidence.</p>		
v)	Create a new system of staff performance appraisal, co-created with staff and agreed with the trade unions.	<p>April 2021</p>	<p>The Council has implemented a light touch solution to appraisals for 2020/2021 to recognise the sheer level of work and commitment staff have shown in the last year.</p> <p>Further work on re-developing appraisals in the longer term is ongoing.</p>	<p>Next update January 2022</p> <p>Interim Executive Director of Resources Director of HR</p>
vi)	By working with Council staff, co-create an environment that is open to listening, free from fear, built on trust and openness and reflects the diverse borough that we serve.	Commenced with appointment of Interim Chief Executive	See recommendation LBC 4 iv	<p>Ongoing – To be updated every quarter</p> <p>Interim Executive Director of Resources Director of HR</p>

<p>vii) Agree a training programme for Council staff that includes finance for non-financial managers, Business Case Development, understanding risk, project management and the Council’s own governance processes.</p>	<p>January 2021</p>	<p>The Council training budget will be held centrally to assist with developing a corporate approach to staff training that creates consistency and efficiency in the way this is managed and delivered. The more specific approach to these areas for training will be agreed once the forensic financial exercise is complete.</p> <p>The forensic audit will now not be completed until the end of June. The deadline has been moved therefore.</p>	<p>September 2021</p>	<p>Interim Executive Director of Resources</p>
<p>viii) Ensure the actions contained in this plan are supported by a corporate programme office that can provide assurance to Members.</p>	<p>Complete</p>	<p>A PMO office has been established dedicated to coordinating and supporting the delivery of key improvement actions across the Council. This includes recommendations in the MHCLG Rapid Review, the RIPI and the Croydon Renewal Plan.</p>	<p>COMPLETE</p>	<p>Interim Executive Director of Resources</p>
<p>ix) Corporate level sponsorship to be allocated to all projects to ensure clarity of responsibility for delivery.</p>	<p>New Recommendation</p>	<p>ELT members already allocated across all actions. Further project managers to be identified to deliver the recommendations.</p>	<p>COMPLETE</p>	<p>Interim Chief Executive</p>
<p>x) Work needs to be undertaken as a priority to understand the future model of the Council, which would inform the direction of travel in the improvement journey.</p>	<p>New Recommendation</p>	<p>A restructure had been proposed and consulted on however, this was paused. The restructure is expected to recommence in the near future.</p> <p>A review of the Council’s Meeting Ecosystem is ongoing.</p>	<p>September 2021</p>	<p>Interim Chief Executive</p>

ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST – June 2021 UPDATE

Appendix 1

xi) Council is to provide appropriate officer support is given to Scrutiny in order that it can fulfil its role.	New Recommendation	See recommendation LBC 2 V	April 2021 – Action progressed Further update to be provided September 2021	Interim Executive Director Resources
--	--------------------	----------------------------	--	--------------------------------------

This page is intentionally left blank

ARCHIVED ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST

Appendix 2

1. The Council has fully accepted all recommendations made by the external auditor (R1-R20)
2. The Council has added additional recommendations LBC1-4
3. There are 9 high priority recommendations from the external auditor for the Council to urgently address:

High Priority Actions	High Priority Actions
R1a Children's Social Care	R12 Revolving Investment Fund
R1b Adult Social Care	R14 Treasury Management
R2 Adequacy of Council Reserves	R18 Ongoing investment in Brick by Brick
R3 Use of Transformation Funding	R20 Governance of subsidiaries
R9 Budget Challenge/Rigour	

This document contains all actions marked complete and therefore archived as per the April 2021 RIPI Cabinet update.

Overall accountability for the action plan rests with the Interim Chief Executive

Recommendation 1a – HIGH PRIORITY
 The Executive Director Children Families and Education needs to address the underlying causes of social care overspends in children’s social care and take effective action to manage both the demand and the resulting cost pressures.

Cabinet Member Accountability: Councillor Flemming, Cabinet Member for Children, Young People and Learning

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
IV) Secure independent external challenge through the Partners in Practice programme to enable valid judgements to be made about the correct level of funding to meet the needs of Croydon’s children in care.	January 2021	Report from LB Camden received under Partners in Practice Programme – December 2020 Independent Financial Adviser commissioned by the DFE to provide expert challenge and support commenced on 22/2/21 for a period of 9 months.	Ongoing support until November 2021 - Marked complete in April 12 th Cabinet report	Interim Executive Director, Children Families and Education

Recommendation 1b – HIGH PRIORITY
 The Executive Director Health, Wellbeing and Adults needs to address the underlying causes of social care overspends in adults social care and take effective action to manage both the demand and the resulting cost pressures.

Cabinet Member Accountability: Councillor Campbell, Cabinet Member for Families, Health and Social Care

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) Commission a diagnostic of spend and opportunities to be carried out by the Local Government Association (LGA) National Care & Health Improvement Adviser Finance and Risks to inform future shape of transformation opportunities.	COMPLETED October 2020	This was carried out and used during November 2020 to inform development of the Adult Social Care Improvement Plan	Marked complete in April 12 th Cabinet report	Executive Director Adult Social Care
ii) Review the current service delivery models of adult social care and gateway services to right size the budget and delivery model to benchmark with comparator Councils in relation to population and service outcomes.	December 2020	Data has been collected which provides benchmarking of Croydon ASC care spend vs other Councils, this was factored in to the Adult Social Care Improvement Plan. Budget modelling has been agreed for ASC for 21/22 budget. Service modelling forms part of adult's improvement plan.	Marked complete in April 12 th Cabinet report	Executive Director Adult Social Care
iii) To create a placements board to challenge the Council on current cost of placements, managing demand for new placements and ensuring value for money in procurement of placements	January 2021	Placements boards have been implemented in the Council to challenge placements and reduce expenditure. Daily challenge panel has been in place since S114. All spend is then promoted to the Spend Control Panel, as agreed with then S151 Officer.	Marked complete in April 12 th Cabinet report	Executive Director Adult Social Care

ARCHIVED ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST

Appendix 2

		<p>Placements programme is in place with an agreed scope. Funding also agreed for Care Cubed placements tool agreed at ELT on 8 March 21.</p>		
<p>iv) Use the output from the diagnostic review to remodel financial implications to help shape the Medium Term Financial Strategy (MTFS)</p>	<p>December 2020</p>	<p>Diagnostic review and benchmarking data has been used to shape the Adult Social Care Improvement plan.</p> <p>Croydon Adults Improvement plan has been fully developed and aligned to budget as signed off at March Cabinet. LBC delivery tracker being updated fortnightly.</p>	<p>Marked complete in April 12th Cabinet report</p>	<p>Director of Finance, Investment & Risk</p>

Recommendation 2 – HIGH PRIORITY
 The Council (including Cabinet and Scrutiny and Overview Committee) should challenge the adequacy of the reserves assessment which should include a risk assessment before approving the budget.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) Develop a reserves strategy as part of the Medium Term Financial Strategy (MTFS) and present it for approval with the Budget reports to Cabinet and Full Council. This needs to incorporate a clear assessment of risks and liabilities that demonstrate all current and future exposure has been thought through and factored into the recommendations. Strategy to map the financial governance process around agreeing additions to reserves to be included to reduce risk of duplication and that there were no gaps in approach.	February/March 2021	The MTFS and 21/22 Budget agreed on 8 th March contains a clear strategy for growing the reserves base up to a level which by 23/24 would give a general fund reserve in excess of £60 million	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment and Risk
ii) In considering future budget reports, Cabinet will assure itself that all risks and liabilities have been properly considered by requesting that the Scrutiny & Overview Committee and the General Purposes and Audit Committee review the adequacy of the strategy and its relationship to the MTFS prior to Cabinet taking a decision.	February/March 2021	From April 2021 Financial Monitoring reports will be provided to Cabinet on a monthly basis to ensure Members have increased oversight on any emerging pressures or movements. The 21/22 Budget was reported to Scrutiny on 16 th February 2021 and comments were verbally reported to cabinet on 8 th March 2021. Future year’s timescales will need to include time for both this and reference to GPAC and Scrutiny	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment and Risk

Recommendation 5
 The General Purposes and Audit Committee should receive reports on the actions being taken to address the Dedicated Schools Grant deficit and challenge whether sufficient progress is being made.

Cabinet Member Accountability: Councillor Flemming, Cabinet Member for Children, Young People and Learning

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) The Dedicated Schools Grant recovery plan should be presented to General Purposes and Audit Committee and Scrutiny and Overview Committee for review and agreement to ensure that it is adequate to meet objectives and timelines that have been set.	February 2021	Reviewed at GPAC 4 March 2021	Marked complete in April 12 th Cabinet report	Interim Director of Education
ii) Special Educational Needs Finance Board to be established and chaired by the interim Director of Education to oversee the delivery of the Dedicated Schools Grant recovery plan.	COMPLETED October 2020	Initial meetings held with further meetings to be scheduled to update on the progress of the DSG recovery plan.	Marked complete in April 12 th Cabinet report	Interim Director of Education
iii) Training to be provided to members to ensure the committee possess a working understand of education funding and budgets	New Recommendation	DSG training has been delivered to members of Scrutiny Committee, Labour Group and Conservative Group	Marked complete in April 12 th Cabinet report	Interim Director of Education /Head of Learning &OD

Recommendation 6
 The Executive Director Children, Families and Education needs to review the services provided to UASC and to identify options to meet their needs within the grant funding provided by the Home Office.

Cabinet Member Accountability: Councillor Flemming, Cabinet Member for Children, Young People and Learning

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) Complete a forensic review of grant income against the total expenditure for unaccompanied asylum seeking children and care leavers over the past 3 years, including the co-ordination of pan-London arrangements	December 2021	Review completed and is informing Council's approach to UASC support offer.	Marked complete in April 12 th Cabinet report	Interim Head of Finance, Children, Families and Education

<p>Recommendation 7 The Executive Director Children, Families and Education needs to identify the capacity threshold for the numbers of UASC that it has the capacity to deliver safe UASC services to.</p>				
<p>Cabinet Member Accountability: Councillor Flemming, Cabinet Member for Children, Young People and Learning</p>				
Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
<p>i) Draw on the analysis and review at 6 (i) to develop options to establish a capacity threshold for Croydon for unaccompanied asylum seeking children that is commensurate with other Local Authorities and in line with the nationally agreed standards and funding.</p>	<p>December 2020</p>	<p>The voluntary national rate is the equivalent of 0.07% of the child population. In Croydon that equates to 66 children. This underpins the forensic review and modelling completed in 6i</p>	<p>Marked complete in April 12th Cabinet report</p>	<p>Interim Executive Director, Children Families and Education</p>

Recommendation 9 – HIGH PRIORITY
 The Council (including Cabinet and Scrutiny and Overview Committee) need to show greater rigor in challenging underlying assumptions before approving the budget including understanding the track record of savings delivery.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal/ Callton Young, Cabinet Member for Resources and Financial Governance

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) To support the Annual Budget setting process Budget Development Meetings will be held for each department and will be attended by Executive Directors, Corporate Leadership Team and Members with accountability for their service area and staff who are responsible for service delivery that understand what impact growth and savings plans will have on the services. To support this process Members will be provided with a clear set of proposals that demonstrate cost pressures (growth) and savings opportunities with narrative and comparators on budget and outcomes delivered to describe the impact of the decisions that are required to be taken.	October / November 2020 -	Proposals were provided to members with a formal decision in November Cabinet. Saving opportunities for 21/22 were set out across all services and have been incorporated into delivery of Croydon Renewal Plan. The Council recognises further savings will be necessary to achieve a sustainable budget in the long term. Discussions for further savings next year will be scheduled starting from April 2021.	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk
ii) To support the budget exercise the Council will seek external support to test the draft budget proposals, seek ideas and good practice and will take the same approach by seeking support for the scrutiny process.	December 2020	Various support from external sources has been utilised to date to offer capacity and advice. This includes the LGA, Council peers and CIPFA. The Council will continue to use such opportunities moving forward.	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk
iii) Develop a budget savings tracker that profiles savings by month to enable Members to track that savings are on target. This will need to correlate with the finance, performance and risk reporting that Council will introduce.	January 2021	An in year savings tracker has been developed to monitor identified savings and escalate any delivery challenges. In year savings are rag	Marked complete in April 12 th	Interim Director of Finance, Investment & Risk

ARCHIVED ACTION PLAN IN RESPONSE TO THE REPORT IN PUBLIC INTEREST

Appendix 2

		rated based on confidence in delivery.	Cabinet report		
iv)	To increase understanding of the choices Cabinet Members are making with regards to the emerging budget and to effectively challenge budget assumptions, Scrutiny and Overview Committee Members to receive regular briefings on the progress of budget setting.	January 2021	<p>Budget Discussions were conducted across January and February 2021. This included focused discussion on the 21/22 budget for specific directorates. Discussion took place at Children and Young People Sub-Committee, Health & Social Care Sub-Committee, at Scrutiny, Streets, Environment & Homes sub-committee and finally the Scrutiny & Overview Committee.</p> <p>The Council will continue to keep Scrutiny committees sighted on budget matters.</p>	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk
v)	To review the budget setting-timetable to ensure that the Scrutiny & Overview Committee has the time to digest and review the budget proposals and underlying assumptions and for Cabinet to respond fully to any challenge or comments and for Cabinet to be able to consider changing its proposals.	April 2021	<p>The Council is taking action to ensure budget discussions happen at an earlier date and more opportunities are offered to members to offer input into the budget and review its management. These actions include finalisation of Council meetings forward plan up until April 2022 with dates marked for policy discussions and monthly financial performance updates at Cabinet.</p> <p>Additionally, budget developments meetings will begin in Spring 2021 as opposed to Autumn meaning savings will be identified and shared with members earlier in year.</p>	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk

Recommendation 11 The s151 officer needs to revisit the Growth Zone assumptions following the pandemic and make recommendations to Cabinet and Council for the continued investment in the scheme.				
Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal				
Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) The Council have commissioned PwC to undertake a strategic review of the Growth Zone with completion expected November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	December 2020	PwC report to cabinet made recommendations on future of GZ. These are now being implemented	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk
iii) Cabinet paper with revised profile and recommendations to be issued March 2021.	March 2021	See 11ii	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk
iv) The Council needs a mechanism in place to review projects to use the learning to inform any future work. This should be extended across all areas of the Council, with learning retained centrally as a corporate resources.	New recommendation	Project closure process in place as part of the governance of all projects.	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk

Recommendation 12 – HIGH PRIORITY
 The s151 officer should review the financial rationale and associated risks and make recommendations to Cabinet and Council on whether the Revolving Investment Fund should continue.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) The Council have commissioned PwC to undertake a strategic review of the Revolving Investment Fund with completion expected in November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	December 2020	Report by PwC on governance & strategic review delivered in November 2020 to Cabinet. Treasury Management strategy updated 1st March 2021 limits new lending under the RIF to BBB working capital loans only	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk
ii) Recommendations to be presented alongside budget review in Feb 2021 to Cabinet, General Purposes and Audit Committee and Scrutiny and Overview	February 2021	See recommendation 12i	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk
iii) Cabinet paper with recommendations to be issued March 2021.	March 2021	See recommendation 12i	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk

Recommendation 13
 The s151 officer should review the purchase of Croydon Park Hotel to identify lessons learned to strengthen future due diligence arrangements.

Cabinet Member Accountability: Councillor King, Cabinet Member for Croydon Renewal

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) The Council have commissioned PWC to undertake a strategic review of assets that have been purchased with completion expected in November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	December 2020	On February 18 th Cabinet agreed the approach set out in the Interim Assets Strategy. This included, in the appendices, options for an approach on the future of Croydon Park Hotel. An update with a decision on the future of Croydon Park Hotel is provisionally scheduled for September 2021.	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk
iii) Review and re-write the asset investment strategy that was approved by Cabinet in October 2018 incorporating advice from each of the Strategic Reviews. The review will explicitly consider best practice from the sector and lessons learned from other local authorities, the external auditor and the National Audit Office on effective investment practice.	March 2021	Interim Asset Strategy has been approved at February 18 th Cabinet to fast track income generation and achieve “quick wins.” A 3 year 21-24 Asset Strategy is being developed provisionally set for January 2022 Cabinet.	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk / Executive Director of Place
iv) Cabinet paper with recommendations to be issued March 2021. Update to be provided at Scrutiny on 9 th February	March 2021	The Interim Assets Disposal Strategy, was discussed at both Cabinet and Scrutiny & Overview Committee in February.	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk

Page 29

Recommendation 14 – HIGH PRIORITY
 The Cabinet and Council needs to re-consider the Treasury Management Strategy for ongoing affordability of the borrowing strategy, the associated risks and identify whether alternative options can reduce the financial burden.

Cabinet Member Accountability: Councillor Young, Cabinet Member for Resources and Financial Governance and Councillor King, Cabinet Member for Croydon Renewal

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) The Treasury Management Strategy will be reviewed as part of the budget setting for 2021/22 and will take into consideration the outcome of the strategic reviews to factor in the overall financial position and best practice from other local authorities. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	February 2021	Treasury Management strategy updated and agreed by Council on 8 th March 2021	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk
ii) The outcome of the strategic reviews that the Council have commissioned will inform the Treasury Management Strategy for 21/22 onwards and any changes in governance that may be required.	February 2021	See recommendation 14i	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk

Recommendation 15 The Chief Executive should arrange detailed Treasury Management training to assist Members to better understand and challenge the long-term financial implications of matters reported within the Treasury Management Strategy.				
Cabinet Member Accountability: Councillor Young Cabinet Member for Resources and Financial Governance				
Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) Members to attend training sessions facilitated by the Local Government Association to cover treasury management to enable better and effective financial leadership.	January 2021	Treasury management training was offered to all members on the 3 rd March 2021. Session was recorded and will be distributed to all Members and all budget managers.	Marked complete in April 12 th Cabinet report	Interim Chief Executive

Recommendation 16
 The s151 officer should revisit the Minimum Revenue Provision policy to demonstrate that a prudent approach is being taken.

Cabinet Member Accountability: Councillor King Cabinet Member for Croydon Renewal

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) Link Asset Management has been commissioned to carry out a review of the Minimum Revenue Position policy. The report with recommendations will be discussed with General Purposes and Audit Committee and then on to Cabinet.	December 2020	Minimum Revenue Provision Policy Statement 2020/21 went to Cabinet 1 st March as part of the Treasury Management Strategy.	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk

Recommendation 17
 The Cabinet and Council should reconsider the financial business case for continuing to invest in Brick by Brick before agreeing any further borrowing.

Cabinet Member Accountability: Councillor Hamida Ali, Leader of the Council

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
ii) Council to review the risks relating to Brick by Brick to ensure they are appropriately listed on the risk register	New Recommendation	The Risks for Brick by Brick have been reviewed and are as follows per the Corporate Risk Register: <ol style="list-style-type: none"> 1. Investigation or ownership taken on all activities that the Council undertakes by the Executive Leadership Team, Cabinet and all Scrutiny Committees (including GPAC). 2. There is no effective challenge, review, investigation or ownership taken on all activities that the Council undertakes by the Executive Leadership Team, Cabinet and all Scrutiny Committees (including GPAC). **These risks specifically relate to financial strategy, treasury management strategy (including borrowing), capital investment strategies and appropriateness of continuing investment and association with BBB**	Marked complete in April 12 th Cabinet report	Interim Director of Finance, Investment & Risk

Recommendation 18 – HIGH PRIORITY
 The Cabinet and Council should review and reconsider the ongoing financial rationale for the Council in the equity investment arrangement with Brick by Brick.

Cabinet Member Accountability: Councillor King Cabinet Member for Croydon Renewal

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
i) PwC has been commissioned to undertake a strategic review of Brick by Brick. The report and recommendations will consider the ongoing financial rationale and equity invested and will detail options for the Council that will be considered by the Scrutiny & Overview Committee Cabinet prior to being presented to Cabinet.	December 2020	<p>This paper went to Scrutiny & Overview Committee and Cabinet in February 2021.</p> <p>The Cabinet paper noted that the Council has never made any equity payments, as planned, and is not in the financial position to do so. It was noted BBB sales proceeds were meant to be placed in an account for the Council to apply interest repayment and, if excess, to substantive loan repayment. Unfortunately, this process has not occurred and instead sale proceeds were retained by BBB effectively replacing the Council's equity share.</p> <p>The Council needs to review existing arrangement, change the current agreements or replace it with fresh loans.</p> <p>It is recommended that the current arrangements continue but in a modified way to give Brick by Brick capacity to have working capital to ensure that funds are available to build out units on site</p>	Marked complete in April 12 th Cabinet report	Interim Chief Executive

LBC Recommendation 3				
Ensuring that Members are appropriately trained across all aspects of the Council’s financial duties and responsibilities				
Cabinet Member Accountability: Councillor Young, Cabinet Member for Resources and Financial Governance				
Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
ii) Further work on Cabinet development will be undertaken to support members to explore priorities for the new Cabinet, agree how the Members will work together to make the most of shared skills and consider individual and collective leadership styles and ways of working.	January 2021	LGA have carried out a facilitated session for Cabinet members	Marked complete in April 12 th Cabinet report	Interim Executive Director of Resources

LBC Recommendation 4
 The Council develops an improvement programme that has the necessary elements for it to function effectively and within its financial resource.

Cabinet Member Accountability: Councillor Hamida Ali, Leader of the Council

Action	Original Deadline	Progress made to date	Updated Deadline	Accountability
VII) Ensure the actions contained in this plan are supported by a corporate programme office that can provide assurance to Members.	Complete	A PMO office has been established dedicated to coordinating and supporting the delivery of key improvement actions across the Council. This includes recommendations in the MHCLG Rapid Review, the RIPI and the Croydon Renewal Plan.	Marked complete in April 12 th Cabinet report	Interim Executive Director of Resources
IX) Corporate level sponsorship to be allocated to all projects to ensure clarity of responsibility for delivery.	New Recommendation	ELT members already allocated across all actions. Further project managers to be identified to deliver the recommendations.	Marked complete in April 12 th Cabinet report	Interim Chief Executive

Page 136

For General Release

REPORT TO:	CABINET 7 JUNE 2021
SUBJECT:	Recommendations from the Croydon Climate Crisis Commission
LEAD OFFICER:	Sarah Hayward, Interim Executive Director of Place Steve Iles, Director of Public Realm
CABINET MEMBER:	Councillor Muhammad Ali, Cabinet Member for Sustainable Croydon
WARDS:	All
COUNCIL PRIORITIES 2021-2024	
<p>The Council's suggested approach in furthering work to reduce carbon emissions is aligned with the the need for the Council to remain within budget. The work on energy efficiency in homes will help to reduce fuel poverty and work on improving air quality in the borough will help to tackle the underlying causes of environmental injustice and keep streets clean and safe.</p>	
FINANCIAL IMPACT	
<p>There is no immediate financial impact arising from the recommendations of this report.</p>	
FORWARD PLAN KEY DECISION REFERENCE NO.: This is not a key decision	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1 RECOMMENDATIONS

The Cabinet is recommended to

- 1.1 Welcome the report and recommendations of Croydon Climate Crisis Commission and record the Council's thanks to the Commission and the New Economics Foundation for their thorough and committed work in challenging circumstances.
- 1.2 Note the actions the Council has already taken to combat climate change.
- 1.3 Note that a detailed, costed delivery plan will be developed in autumn 2021 to implement the Commission's recommendations, provided that this can be done within the Council's existing budget or utilising external funding resources.
- 1.4 Note that a copy of the Climate Crisis Commission report will be shared with the Chairs of relevant Council Committees to consider how their committee work can support the Climate Crisis work undertaken by the Council.

2 EXECUTIVE SUMMARY

- 2.1 This report presents the Croydon Climate Crisis Commission's report, the findings of online engagement on its draft recommendations, and the Commission's final recommendations to enable the borough of Croydon to become carbon neutral by 2030. The actions identified are wide-ranging, with implications for many areas of council activity including planning, housing, economic growth, commissioning and transport.
- 2.2 The Council declared a climate change and ecological emergency in July 2019. Already a wide range of actions are underway in Croydon to combat climate change, from the environmental requirements the Council makes of its suppliers, to its programmes to install 400 electric vehicle charging points and develop more cycle routes. Requirements in Croydon's current Local Plan ensure the sustainable design and construction of new buildings, and the Council gives advice and help to access grants to improve energy efficiency in existing private housing, and runs a retrofit programme for council stock. An Air Quality Action Plan is being implemented to tackle air pollution in the borough.
- 2.3 Compared to the other London boroughs, Croydon's emissions are above the median. The Council is committed to deliver as many of the Commission's recommendations as possible. There are multiple benefits to be gained from measures to reduce carbon emissions: lower energy costs, warmer homes and a lower carbon footprint can go hand in hand; measures to reduce traffic and increase active travel reduce air pollution and improve health. The Council can help to drive a green economic recovery by identifying green jobs in Croydon and enabling local people to gain the skills needed and access them, and by working with local anchor institutions, such as colleges and NHS trusts, to buy more goods and services from local suppliers. The Council can help to green our neighbourhoods by extending cycle routes and the 'school streets' programme, seeking funding to increase the number of public, residential and rapid charging points for electric vehicles, and working to increase the number of electric cars in car club fleets. Croydon's Local Plan Review will look to embed further the policy context for the vitality, viability and sustainability of District Centres, Neighbourhood Centres and Shopping Parades, supporting the concept of the 15-minute city. The Council can also seek funding to increase the installation of solar panels in the borough and increase the energy efficiency of council homes.
- 2.4 On its own, the Council cannot achieve the scale of change required in the borough. It will therefore build a broad alliance of partners to address the climate and ecological crisis together, involving residents, unions, businesses, civil society organisations, further education and skills providers, and other anchor organisations. The Council's financial circumstances mean that staffing and financial resources available to implement the recommendations are limited. Along with its internal available resources, and Section 106 carbon offset funding, it will seek and pursue all available opportunities from external sources at a local, regional and national level for resources available to local government and also work with partner organisations that can access funding streams not directly accessible to the public sector. The next steps therefore involve the development of a detailed and costed delivery plan and applications

for external funding to resource implementation actions. The detailed delivery plan will be presented to a future meeting of Cabinet in autumn 2021.

3 CONTEXT

- 3.1 In 2019 domestic emission sources in Croydon, notably heating and powering homes, made up approximately 46% of CO₂ emissions in Croydon – and without action, this share is expected to increase to 60%. Transport emissions made up approximately 24%, and industry and commercial emissions made up approximately 30% of the borough's CO₂ emissions. Not including consumption emissions, Croydon's current rate of carbon emissions is estimated at around 1.08 million tonnes (CO₂ equivalents) per year.
- 3.2 Croydon Council declared a climate change and ecological emergency on 15 July 2019 and set a target for the Council to become carbon neutral by 2030 (minute item 53/19). The Council commissioned the Campaign Company, to recruit, facilitate and report back on the work of Croydon Citizens' Assembly on Climate Change, and the New Economics Foundation (NEF) to set up and support an independent climate crisis commission. Croydon Climate Crisis Commission was launched in March 2020, shortly before the country entered lockdown in response to the Covid-19 pandemic, and built on the work of the Citizens' Assembly that had taken place in January and February 2020.
- 3.3 The vision of the Commission is to drive rapid reductions in the carbon emissions from activities in the borough of Croydon, with the intention of becoming carbon neutral by 2030. The Commission aims to ensure the transition to zero carbon happens in a fair and just way, providing good quality jobs, improving wellbeing, and reducing inequality. Its short term purpose was to identify priority areas for action, developed with the people of Croydon, to show how the borough of Croydon can become carbon neutral by 2030.

Impacts of COVID-19 Pandemic and the Council's financial situation

- 3.4 The work of the Commission was impacted both by the COVID-19 Pandemic and by the Council's financial situation:
 - **Context of Commission's recommendations:** The context in which the Commission is making recommendations and the challenges faced have changed as a result of the pandemic. The Commission's focus has shifted slightly to recognise that it is now making recommendations in the context of a financial downturn and is considering how its recommendations can support economic recovery in a way that moves towards the carbon neutral target.
 - **Timeframe:** The Commission launched days before the national lockdown and a short period was needed to review ways of working and identify the best options to continue its work by moving meetings online. This meant that the first Commission meeting took place in May 2020 rather than at the end of March as originally intended. As a result the timetable has been extended by several months and a higher concentration of work was planned for after the public engagement.

- **Availability of resources:** Prior to the lockdown, the Council had been seeking to recruit to a role to provide additional capacity and administrative and coordination support to the Commission, as agreed with NEF as part of the proposal. A recruitment freeze removed this option and NEF has sought to provide this additional capacity at no additional cost to the Council.

New Economics Foundation

- 3.5 NEF were brought on as consultants to support the Commission and ensure that it remained independent from the Council. They provided continuous support to the Commission and working groups, and acted as the secretariat for the Commission, facilitating meetings, supporting the chairs of the working groups and providing administrative support.
- 3.6 NEF has been instrumental for this work and the Council takes this opportunity to thank them for their commitment, understanding and support during these unprecedented times.
- 3.7 Council officers participated in the working groups to provide expertise and join up with other work streams around the Council wherever possible.

4 CONSULTATION

- 4.1 Once the working groups had identified key themes and outcomes for recommendation, the Council undertook engagement with residents, businesses and young people to ensure that they were given the opportunity to input and have their voices heard consistently.
- 4.2 Initially, the Council planned engagement activities which involved a series of five workshops in November / December 2020 and an online survey. However, due to the Council's financial situation, this was reduced to an online survey only.
- 4.3 The Council conducted the survey to collect views on the Commission's initial recommendations during a two week period between January and February 2021. The survey was publicised by social media (Twitter), Council website banners, as well as the Commission's website and Twitter. It was also distributed by email to the Council's partners, and the Commission sent it to the commissioners and their working groups and their networks.
- 4.4 More than 400 people responded: 69% were residents of Croydon, with the majority of the remaining group either working in Croydon or living nearby.
- 4.5 Respondents came from most of Croydon's wards; however, 54% of respondents came from just two wards: Crystal Palace and Upper Norwood, and South Norwood. Respondents who reported their demographic data were slightly more likely to be female (60% of respondents) and most likely to be middle aged. Only 4% of respondents were aged 30 and under, and only 4% were aged 71 and over.

- 4.6 As data from 2019 suggests that 38% of Croydon's population is under the age of 30, and around 9% are aged 70 and over, the respondent sample cannot be treated as a statistically representative sample of the Croydon population.
- 4.7 Ten out of 12 recommendations received overwhelmingly positive feedback. Summary feedback is provided against the recommendations in Appendix 1. Recommendations receiving strong support included:
- Better understanding and measuring progress on emissions reduction, and embedding climate change action in Council activities,
 - Delivery of good quality green homes in the borough, tougher standards for new homes, and retrofit in existing homes,
 - Cheaper, safer and more accessible public transport and active travel facilities,
 - Roll out of public and private electric vehicles and related infrastructure,
 - Creation of green jobs in the borough, and harnessing the power of anchor institutions and community wealth building to strengthen the local economy and accelerate its green transition,
 - Tree planting and restoring local green spaces.
- 4.8 The survey also highlighted the need to get consultation and community engagement right when planning changes in local areas.

5 RECOMMENDATIONS FROM THE CLIMATE CRISIS COMMISSION

- 5.1 The recommendations from the Croydon Climate Crisis Commission are grouped into five priority areas for action:

1. Getting the groundwork right:

- Rebuild trust with residents, community groups, trade unions and businesses.
- Develop an alliance of partners to drive a green economic recovery
- Establish oversight and accountability
- Tackle climate adaptation risks
- Establish measures to chart progress
- Embed climate adaptation and carbon reduction actions in the plans of the Council and its partners
- Contribute to a broader knowledge exchange.

2. Driving a green economic recovery - through [community wealth building](#), which aims to cultivate local businesses that are generative creators of social value, reinvesting their wealth back into the communities they serve:

- Promote green jobs and skills
- Strengthen the local and foundational economy, working with anchor organisations
- Continue progress towards a circular economy.

3. Greening our Neighbourhoods:

- Increase renewable energy production and demand
- Develop a pipeline of retrofit projects to decarbonise and improve the energy efficiency of commercial and residential buildings
- Develop local retrofit delivery capacity

- Adopt the 15-minute city model, and embed it into the Local Plan to localise Croydon
- Promote public transport and active travel to become the natural first choice – including pilot approaches to Low Traffic Neighbourhoods
- Provide the infrastructure to promote the use of electric cars.

4. Getting people and businesses involved:

- Develop a positive borough-wide campaign – with high profile school campaigning
- Promote action at scale.

5. Achieving the scale of change - lobby GLA and central government on:

- Appropriate long-term funding to support delivery of climate adaptation and Net Zero actions
- Extending the Ultra-low Emissions Zone
- Affordable public transport
- Distance-based road pricing.

5.2 Further detail of the recommendations can be found in Appendix 2.

6 CURRENT COUNCIL PROGRAMMES TO TACKLE THE CLIMATE CRISIS

6.1 Croydon Council already runs several programmes to tackle the climate crisis, both to adapt to the climate crisis and reduce emissions.

6.2 In some areas the Commission's recommendations build on the Council's current activity and future plans. Examples of current actions are set out under the relevant priority area for action identified by the Commission.

1. Getting the groundwork right

- [Social value framework](#) seeks benefits from the Council's procurement expenditure, including reduced air pollution and carbon footprint, and increased biodiversity.
- Actions supporting climate adaptation include:
 - The introduction of climate control to council-run passenger vehicles for temperature reduction in hot weather
 - The Council has started to actively collect rainwater to remedy the ecological risk of periods of drought and dry weather
 - The Council's highways team are training more drivers of gritting vehicles and introducing a three shift system to increase standby capability and flexibility
 - Where appropriate, planning conditions can be attached to planning consents to ensure sustainable development, including appropriate soft landscaping and provision of green roofs.

- All new council stock incorporates climate change adaption features, for example flood resilience
- Promotion of the use of heat wave action plans for businesses and communities.

2. Driving a green economic recovery:

- An obligation is placed on the Council, when tendering, to make provision in the relevant tendering and contract documents to require contractors to pay the London Living Wage. Local businesses are encouraged to commit to paying the London Living Wage, and the Council will promote the Mayor's Good Work Standard.
- Strategic partnerships are being built with housing associations and developers to identify future green jobs.
- Workers are offered opportunities to upskill and retrain to access growing work sectors.
- An employment and skills forum, comprising universities, colleges, private providers and users, is mapping existing provision and working together to source external funding – this can help to reduce green skills gaps.
- There is support for local groups to access external funding.
- £20,000 business recovery and innovation grants are conditional on businesses meeting community wealth building priorities of buying and employing local, and reducing their carbon footprint.
- The South London Waste Plan (2019) sets out the boroughs' approach to reduce waste and create a circular economy, with options to reuse, repair or re-manufacture the things we buy. One of the Council's Household, Reuse and Recycling centres will have a ReUse shop later this year.

3. Greening our Neighbourhoods

- [The Croydon Local Plan 2018](#) has measures to tackle the climate crisis. Most notably, Policy SP6 Environment and Climate Change seeks to ensure energy efficiency and emission reductions through sustainable design and construction. The policy also contains provisions for flood risk management and sustainable waste management. The Local Plan is applied in tandem with the London Plan 2021, in particular Chapter 9, which addresses sustainable infrastructure. The Local Plan supports the concept of the 15-minute city with policy encouraging and preserving the vitality, viability and sustainability of the borough's District Centres, Neighbourhood Centres and Shopping Parades.
- The Council's Healthy Homes Scheme provides energy advice and help for vulnerable and fuel poor households to access grants to improve the energy efficiency of their private sector homes.

- Decarbonisation of social housing is underway, with a retrofit programme and heat pump installation. A feasibility study of installation of solar photovoltaic panels on council homes was completed – third party capital funding is needed.
- Local colleges are already working with employers and planning how to provide retrofit training.
- The Mayor’s construction academy in Croydon College is providing training and upskilling of current construction workers.
- Installation of 400 electric vehicle charging points by 2022 is underway.
- Scaling the cost of parking permits and pay and display parking, providing discounts for less polluting and greener vehicles.
- Increasing the proportion of electric, hydrogen and ultra-low emission vehicles in car clubs.
- A programme to develop cycle routes is underway.
- A pilot Low-Traffic Neighbourhood in Crystal Palace to promote active travel.
- A School Streets initiative encourages the use of cycling and walking by placing restrictions on road travel during pick-up and drop-off times on streets near certain schools.
- Commitment to plant 3,500 trees by 2023, including installing 60 new planting bays alongside roads in the borough’s neighbourhoods.
- Producing an Air Quality Action Plan to tackle air pollution in the borough.
- Changes to waste collections services in 2018 increased the amount of household waste being recycled from 38% to 50%, putting Croydon in the top quartile in London.

4. Getting People and Businesses involved

- A Business Low Emission Neighbourhood in London Road, West Croydon, is working with local businesses to reduce emissions.
- Cleaner Air Champions - volunteer programme empowers local people to raise awareness and understanding of problems around air quality and promote activities for people to do to help improve their local air quality.
- Air quality monitoring at all schools, with air quality audits being carried out at schools in 2021/22.

7 COUNCIL'S RESPONSE TO THE RECOMMENDATIONS

- 7.1 The Council's current financial situation limits the funding and staffing resources available to implement several of the recommendations. Nevertheless, it is strongly committed to reducing carbon emissions as much as possible and some recommendations build on existing council programmes to reduce emissions. The Council can help to drive a green economic recovery by identifying current and future green jobs in Croydon and enabling local people to gain the necessary skills and access them, and by working with local anchor institutions, such as colleges and NHS trusts, to buy more goods and services from local suppliers. The Council will help to green our neighbourhoods by extending the 'school streets' programme, by seeking funding to extend cycle routes and increase the number of public, residential and rapid charging points for electric vehicles, and by working to increase the number of electric cars in car club fleets. The Council will also seek funding to increase the installation of solar panels in the borough and increase the energy efficiency of council homes. A single webpage will be developed providing all the details on the Council's response to the Climate Emergency.
- 7.2 What is needed going forward is to forge alliances with a diverse range of groups and stakeholders across the borough: education, skills providers, and wider public sector organisations, businesses, employees and trade unions, the community and voluntary sector, and local residents. The Commission's recommendations are for Croydon as a whole and the Council as a local leader will convene partners to co-design activities to achieve the common purpose of becoming a sustainable borough by 2030. It will also explore partnership with local authorities in the South London Partnership, who share a commitment to sustainability and tackling climate change, and the Greater London Authority.
- 7.3 The recommendations will inform the development of plans in areas such as Croydon's economic renewal, housing and transport. A copy of the Climate Crisis Commission report will be shared with the Chairs of relevant Council Committees to consider how their committee work can support the climate crisis work undertaken by the Council. With regard to planning, the important role the borough's District Centres, Neighbourhood Centres and Shopping Parades can play in a sustainable future for the borough has become more important and understood since the adoption of the Local Plan 2018. Therefore, the Local Plan Review will look to embed further the policy context for the vitality, viability and sustainability of these centres, which aligns with the 15-minute city concept.
- 7.4 Some recommendations will influence the shape and delivery of existing council programmes and plans, such as commissioning, and have few financial implications in themselves. However, other recommendations do have financial implications, and will therefore only be implemented if the resources required are accessed externally. Given its financial position, the Council will not be able to support measures that reduce its own rental or parking income, or increase spending or risk, for example by developing a council owned energy company or providing new funding for initiatives from its own resources, although it can review the eligibility criteria for its existing programmes or obtain support from external sources.

- 7.5 While the Commission recommends that the Council ensure that its pension investment strategies are in line with their declaration of a climate emergency, it should be noted that the Council acts as the Pension Fund's administering authority (a separate statutory entity from the Council). The current Pension Investment Strategy states at paragraph 6.3: 'The Fund will only invest in investments with a strong environmental [policy]... The Fund will disinvest from existing fossil fuel investments in a prudent and sensible way that reflects the fiduciary responsibility due to stakeholders. Furthermore, where this is consistent with the agreed investment strategy, the Fund will invest in assets that positively address these issues. Examples of this approach include investing in renewable energy projects...' The Pensions Committee is reviewing the Pension Investment Strategy Statement to ensure that it is compliant with the latest guidance and regulations and considering how to respond to the Task Force on Climate Related Disclosures and targets set by the 2015 Paris Agreement. The outcome of this review is expected in September 2021. In due course, the Committee will also consider targets emerging from the UN Climate Change Conference to be held in Glasgow in November 2021.
- 7.6 The Council is directly responsible for between 2 and 5% of the borough's carbon emissions, depending on how the Council's emissions are defined. The Council's carbon emissions baseline will be defined and established, against which to measure reductions.
- 7.7 A detailed and costed delivery plan will be developed to implement with local and regional partners as many of the Commission's recommendations as practicable and affordable. As part of this work, potential future external funding to support implementation will be identified. Development work will also note Government measures set out in the Energy White Paper (December 2020) for heat pumps, addressing fuel poverty, raising standards for new homes and enabling savings on bills and the provisions of the Environment Bill that proposes a framework for legally-binding environmental targets and measures for recycling, tackling air pollution, securing water supplies and wastewater services, and protecting nature and biodiversity through the planning system. The Council will also consider forthcoming sector strategies, including Heat and Buildings, the Transport Decarbonisation Plan, and the comprehensive Net Zero Strategy for transitioning to a net zero economy by 2050.
- 7.8 A range of national and regional funding programmes are available, some of which the Council has already accessed, that could potentially support the implementation of recommendations from this report. Department for Education funding for adult education and Department for Work and Pensions funding for upskilling and retraining, may be supplemented by companies with apprenticeship levy funds available. Department for Business Energy and Industrial Strategy provides funding for business grants and the Ministry of Housing, Communities and Local Government provides the Future High Streets fund. There is also funding from the Mayor of London's Office, for example the London Recovery Board and the Mayor's Air Quality Funding, and from Transport for London's Local Implementation Plan for active travel initiatives. Electric vehicle charging points are funded by the Department of Transport and Innovate UK, Transport for London. Charging points and other initiatives are also funded by developers through Section 106 carbon offset funding.

- 7.9 The 2020 Spending Review made a number of announcements in this regard: £1.9bn of investment in electric vehicle charging infrastructure and grants for zero and ultra-low emission vehicles until 2024-25, including £275m for charge point installation at homes, workplaces and on-street locations, and a commitment to spend £3bn on building decarbonisation, including retrofitting homes and public buildings with energy efficiency upgrades and making them cheaper to heat with low-carbon energy, and support for the creation of clean heat networks. Budget 2021 announced the Levelling Up Fund and Community Renewal Fund, though it is noted that Croydon is, respectively, in category 2, and is not regarded as a 'priority place'.
- 7.10 Following closure of both the Green Homes Grant voucher scheme for homeowners and landlords and the Domestic Renewable Heat Incentive in March 2021, the government announced £300m of extra funding for energy efficiency and low carbon heating schemes for low income households, to be distributed via local authorities.
- 7.11 We will also explore how our partners may contribute to the borough-wide effort to address the climate and ecological crisis by attracting funding from other sources not available to the Council, such as sponsorship, loans from the UK Infrastructure Bank, or ethical green financing. VCS organisations can access government funding specifically for the sector, such as the Community Ownership Fund announced in the budget. Long-term sustainable external funding will be essential to enable the Council to help achieve our carbon neutral target.

8 PRE-DECISION SCRUTINY

- 8.1 The Leader of the Council submitted a report on Croydon Climate Crisis Commission to the Scrutiny Streets, Environment & Homes Sub-Committee on [29 September 2020](#). The committee's recommendations for the Commission focused on:
- Ensuring officers gave consideration as to how to measure success in order to ensure that the Council was on target to meet commitments to be Carbon neutral by 2030
 - The Commission and officers making sure that engagement on the Climate Action Plan and recommendations was managed well using existing council resources, such as the Citizens' Assembly if possible
 - The Council embedding sustainability in all its processes and major decisions including engaging with the Commission on the Medium Term Financial Strategy.

9 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 9.1 There are no financial implications arising directly from this report.

- 9.2 The Commission's recommendations will be costed and a detailed implementation plan will be developed to deliver them within existing resources. Where additional resources are required to implement them, it will be obtained through bids via external sources of funding.

Approved by Geetha Blood, Interim Head of Finance, Place and Resources on behalf of Director of Finance, Investment and Risk, S151 Officer

10 LEGAL CONSIDERATIONS

- 10.1 The Head of Litigation and Corporate Law comments that the Climate Change Act 2008 commits the UK government to reducing greenhouse gas emissions. The Act provides for the setting of legally binding 'carbon budgets'. The Act also puts in place a policy framework in the UK to promote adaptation to climate change in five yearly cycles. The Government has pledged to introduce a legally binding target for the UK to have net-zero greenhouse gas emissions.
- 10.2 The European Union Air Quality Directive 2008/50/EC has been transposed into English law as the Air Quality Standards Regulations 2010.
- 10.3 In January 2018 the government published a 25 Year Environment Plan which sets out the government's goals for improving the environment within a generation. The Plan's broad goals are clean air, clean and plentiful water, thriving plants and wildlife, a reduced risk of harm from environmental hazards such as flooding and drought, using resources from nature more sustainably and efficiently, enhanced beauty, heritage and engagement with the natural environment, mitigating and adapting to climate change, minimising waste, managing exposure to chemicals and enhancing biosecurity.
- 10.4 In May 2018 under changes made by the Localism Act 2011 to the Greater London Authority Act 1999 ('GLA Act') the Mayor of London published a London Environment Strategy. Section 351A of the GLA Act provides that the Strategy must contain provisions dealing with the Mayor's policies and proposals in relation to each of the following matters in relation to Greater London — biodiversity, municipal waste management, climate change mitigation and energy, adaptation to climate change, air quality and ambient noise. The London Environment Strategy also contains a general assessment of London's environment. In addition, the GLA Act also requires environmental policy to be reflected in other strategies published by the Mayor such as the London Plan, the Transport Strategy and the Police and Crime Plan.
- 10.5 In relation to air quality the Council must have regard to the air quality provisions within the Mayor's London Environment Strategy when exercising its local air quality management functions. .
- 10.6 To address climate change mitigation and energy as a borough Planning Authority the Council is responsible for enforcing the low carbon and energy efficient building design and operation of standards of development set out in the London Plan.
- 10.7 When considering adapting to climate change the Council is a Lead Local Flood

Authority with respect to surface water and groundwater flooding. The Borough Director of Public Health is responsible for implementing Public Health England's national heatwave plan in order to manage population health and well-being.

Approved by Sandra Herbert, Head of Litigation and Corporate Law, on behalf of the Director of Law and Governance & Deputy Monitoring Officer

11 HUMAN RESOURCES IMPACT

11.1 There is no human resources impact arising directly from this report.

Approved by: Sue Moorman, Director of Human Resources

12 EQUALITIES IMPACT

12.1 While climate change will impact everyone, people who are more socially vulnerable could potentially experience a greater impact from its effects. Relevant factors include age and health, the quality of housing and proximity to green space, and social and institutional factors, such as inequality, social capital and social cohesion. People with limited mobility, older people, people with poor health, people living in disadvantaged areas and from black, asian and ethnic minority groups are therefore likely to be more impacted.

12.2 Commissioners for the Climate Crisis Commission were appointed from diverse backgrounds to ensure that the needs of Croydon's diverse population were adequately considered in recommending any action the Council should take regarding climate change and sustainability.

12.3 The recommendations of Croydon Climate Crisis Commission aim to assist the adaptation to climate change as well as reduce carbon emissions. They are designed to ensure that the transition to zero carbon happens in a fair and just way, improving wellbeing, reducing inequality and providing good quality jobs. They support a green economic recovery from the impact of the Covid lockdown. The measures contained in this report should therefore have a positive impact on all residents, including those who share protected characteristics.

12.4 An improvement in air quality will benefit all ages but especially those suffering with childhood and lifelong asthma. Croydon has more than 17,000 fuel poor households. Measures to improve the energy efficiency of homes will enable more people to live in warm homes, reducing fuel poverty, and particularly benefit those older people, people with disabilities and people in poor health who spend more time at home and live on lower incomes, as well as people who live in disadvantaged areas.

12.5 Commission recommendations advocate less travel by car through a reduction of parking spaces (as well as more public transport and active travel). While this could have negatively impacted some people with a disability who need to use a car, the Council will not make any further reduction in car parking spaces,

but will instead encourage people to get low emission vehicles and car clubs to use electrical vehicles through pricing policy.

- 12.6 The Equality Analysis of the recommendations summarized above is attached at Appendix 3.

Approved by: Yvonne Okiyo, Equalities Manager

13 ENVIRONMENTAL IMPACT

- 13.1 All works carried out to date are expected to have a beneficial impact on the Council's carbon footprint as well as on the greening of our borough and the air quality.
- 13.2 This report sets out the next steps for implementing the recommendations of Croydon Climate Crisis Commission. The recommendations themselves range over many areas of activity, including planning, housing, transport, economic growth and skills.

14 CRIME AND DISORDER REDUCTION IMPACT

- 14.1 There is no crime and disorder impact arising from this report.

15 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 15.1 To welcome the report and recommendations of Croydon Climate Crisis Commission, thank NEF for its role in supporting and facilitating the work of the Commission, and set out the next steps to plan and resource actions that will enable the borough to become carbon neutral by 2030.

16 OPTIONS CONSIDERED AND REJECTED

- 16.1 The Council considered cancelling the Commission due to the current financial situation. This option was rejected as the Council recognises that the climate emergency still needs to be tackled wherever and whenever possible. Moreover, the work was nearing completion and it would have been wasteful to leave this project unfinished with the amount of interest and engagement from residents.

17 DATA PROTECTION IMPLICATIONS

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

NO

- 17.2 **HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN**

COMPLETED?

NO

The Director of Public Realm comments that the council's information management team have advised that there is not a high risk to the participants in the engagement survey and their data and confirmed that a DPIA would not be required in this instance.

Approved by: Steve Iles, Director of Public Realm

CONTACT OFFICER:

John Montes, Senior Strategy Officer, 020
8726 6000 Ext 61613

APPENDICES TO THIS REPORT:

Appendix 1 – Croydon Climate Crisis Commission Draft Recommendations Feedback
Appendix 2 – Croydon Climate Crisis Commission Report and Recommendations
Appendix 3 – Equality analysis

BACKGROUND DOCUMENTS:

None

This page is intentionally left blank

Engagement Overview

This document provides a summary of the engagement activities and a summary of the feedback received on the Commission's draft recommendations.

The financial situation of the Council has meant that the Council's planned engagement activities, discussed at the third Commission meeting, which involved a series of five workshops in November / December 2020 and an online survey, were reduced to an online survey only.

Commission Members have previously emphasised the need to engage a wider group of people to build support and develop the ideas for the Commission. In light of the reduced nature of the engagement activities conducted to date, Commission members may wish to consider additional recommendations related engaging individuals, groups and businesses on the recommendations going forward.

Citizens Assembly

As agreed at the outset of the project, a follow up discussion was held with former Citizens Assembly members on the draft recommendations. This online discussion was hosted by the Commission Chair on 10th February, 2021, and six former Citizens Assembly members were able to attend and share their views. Key summary points from the discussion include:

- The importance of public engagement, and need to find ways to overcome apathy and cynicism. Set this as the people's agenda not an agenda imposed by the Council. Need a vibrant engagement process to identify people / organisations to hold this agenda.
- Need to map local groups, to tap into the growing number of volunteers / people with energy and ideas.
- Low Traffic Neighbourhoods noted local opposition to road closures and how this was implemented.
- Opportunity in Schools to build on what is happening already in the borough. Noted the intention to develop a network of schools already being discussed, as a structure to introduce eco-schools.

Online Survey

The Council conducted an online survey to collect views on the initial recommendations from the Commission during a two week period (survey closed February 9th, 2021).

Of the 465 people submitting responses: around 69% are residents of Croydon, the majority of the remaining group either work in Croydon, or live very close to its administrative boundary.

Respondents came from the majority of Croydon's wards, however 54% of respondents came from just two wards, Crystal Palace and Upper Norwood, and South Norwood. Respondents who reported their demographic data were slightly more likely to be female (60% of respondents) and respondents were most likely to be middle aged. Only 4% of respondents were under the age of 30 and only 4% were over the age of 71.

As data from 2019 suggests 38% of the population of Croydon is under the age of 30, and around 9% over the age of 71 the respondent sample cannot be treated as a statistically representative sample of the Croydon population.

Ten out of 12 recommendations received overwhelmingly positive feedback. Summary feedback is provided against the recommendations below.

Headline recommendations and summary feedback

Getting the groundwork right

The Council will need to put in place the support mechanisms to drive change within the Council.

The Council should:

- 1. Establish measures to understand success**
 - Establish a clear and understandable baseline for carbon emissions in the borough and prepare a roadmap of required reductions to meet the net zero by 2030 target.
 - Create a set of simple, understandable measures and accountability indicators to chart progress in tackling the climate emergency in Croydon and make the results regularly publically available.
 - Host annual community events to review progress and enable the Community to hold the Council to account.
- 2. Establish oversight mechanisms**
 - Appoint a Councillor with responsibility for overseeing implementation of the recommendations
 - Create a senior-level resilience officer with cross-Council responsibility for implementing actions and ensuring all Council activity works to support the net zero target.
- 3. Embed carbon reduction and climate adaptation in Council activities and strategies**
 - Conduct a thorough review of all current Council activity to ensure it is working to support the carbon reduction targets. Identify quick wins and longer term changes in Council activity that can reduce the carbon footprint of the borough.
 - Conduct a thorough review of existing Council strategies and plans to ensure they support the carbon reduction roadmap, identifying co-benefits and revising those that are not aligned. This includes strengthening planning regulations to cut emissions from new developments and address adaptation risks, including on small scale builds.
- 4. Contribute to a broader knowledge exchange**
 - Engage with other councils / GLA to learn from their experience, share best practice and assess opportunities for collaboration.

Survey feedback: There was strong support for recommendations around better understanding and measuring progress on emissions reduction, and embedding climate change action in Council activities.

Climate ready homes

Retrofitting homes and commercial property to reduce their energy use across the borough is a priority. The Council can provide certainty for retrofitting businesses by creating a pipeline of work through social housing, and increase confidence for homeowners to make changes to their properties by identifying local trusted trades people

The Council should:

1. Develop a pipeline of retrofit projects

- Conduct a detailed housing stock retrofit needs analysis.
- Accelerate efforts to decarbonise social housing, providing a pipeline of work for locally-based businesses.

2. Develop local retrofit delivery capacity

- Create a one-stop-shop for private retrofit advice, trusted traders, and accessing government grants.
- Create of a retrofit academy in association with Croydon colleges that can provide good quality education leading to good quality jobs in retrofit for residents in the borough.
- Provide training and upskilling of current construction sector workers.

Survey feedback: The two most popular recommendations both related to housing and the built environment. There were strong feelings regarding the need to deliver good quality green homes in the borough, and strong support particularly for recommendations on tougher standards in new home building, and schemes which support retrofit in existing homes. There was also strong support for the development of a retrofit pipeline.

Getting around

The Council will need to both reduce the need to travel and influence the type of travel adopted by residents and businesses to achieve the carbon reduction targets.

The Council should:

1. Adopt the 15-minute city model and embed it into the Local Plan to localise Croydon

- The 15-minute city model¹ is a decentralised urban design approach which locates work, shops, and other services such as doctors within 15 minutes travel of peoples home by walking, cycling, or public transport. This approach reduces demand for private transport, and provides more opportunities for local businesses.

2. Promote public transport and active travel to become the natural first choice

- Improve and extend cycle routes to connect all of Croydon, and define lanes with green infrastructure (hedges and planters)
- Develop and pilot Low Traffic Neighbourhoods in every ward. These should be designed in consultation with residents and local businesses, and target areas with poor air quality.

3. Provide the infrastructure to promote the use of electric cars

- Ensure the current commitment of 400 public charging points by 2022 is delivered and extended to improved access to rapid public charging points.

Survey feedback: The recommendations on transport generated strong feelings in a significant subset of the respondent group. A strong message came through that Croydon Council have failed to consult residents on previous schemes relating to incentivising active travel well enough, resulting in poorly planned schemes and a general lack of confidence in the council's ability to deliver the types of schemes proposed in the Commission's

¹ A concept developed by Professor Carlos Moreno of Sorbonne University
https://www.ted.com/talks/carlos_moreno_the_15_minute_city?language=en

recommendations (e.g. the 15 minute city). On the one hand, a large number of respondents called for cheaper, safer and more accessible public transport and active travel facilities.

Among those residents who had lost confidence in the council's ability to deliver, there was an aversion to the Commission's recommendations around prioritising public and active transport, and delivering a 15 minute city. Conversely, and particularly among this same group, there was strong support for facilitating the roll out of electric vehicles, both public and private, and the related infrastructure.

Green skills and jobs

The Council need to ensure Croydon citizens have access to good quality jobs created through investments in green sectors.

The Council should:

1. Promote green jobs and skills

- Develop a medium-term plan to identify the pipeline of future green jobs in the borough, and to identify and prioritise the skills needed to open up these opportunities to local people.
- Review how the Council can best support Croydon Works², in response to the current economic crisis, and in the medium term in support of the future green jobs strategy.
- Remove barriers for businesses to support training by creating a single point of contact to speak to about skills needs and support.

2. Harness anchor institution spending to strengthen the Croydon economy

- Engage with local anchor institutions (Council, NHS, and Education Institutions) to agree a Community Wealth Building approach to ensure their procurement spending supports local businesses and employment.

Commissioner feedback: I challenged on the Jobs, Skills and Employment working group the vague reference to 'good quality jobs' without clarifying what this means. I referred Jonathan Sharrock to the ILO guidelines that include, most importantly from my perspective, trade union recognition

Survey feedback: There was very strong support for both the Commission's recommendations on supporting creation of green jobs in the borough, and harnessing the power of anchor institutions and community wealth building to strengthen the local economy and accelerate its green transition. Respondents made suggestions around the provision of seed funding to local green businesses such as bicycle cargo and solar installation companies and incentives to local businesses which are proactive in reducing the environmental impact.

Getting people and businesses involved

The headline recommendations will need buy-in and engagement from Croydon residents and businesses to make them a reality. This will require both awareness raising activities across the borough about the actions residents, business and other local organisations can take, and engagement activities to inspire people to take action.

² Croydon Works is Croydon's Job and Training Hub providing a free recruitment service, working in partnership with Job Centre Plus, Croydon College and Croydon Council <https://croydonworks.co.uk/>

The Council should:

1. Develop a positive borough-wide campaign

- Framing the climate change emergence as a challenge ‘Croydon is taking on’, and different sectors are tackling.
- Promote existing national campaigns targeting increasing awareness of action residents can take, and scale local campaigns and existing action by sharing practice across the borough.
- Support local innovation through the provision of small seed funding grants to locally-based organisations / residents to deliver creative local campaigns to promote action.

2. Promote action at scale

- Develop a high profile campaign to reduce the emissions of all schools by 2025. Providing advice and support for all schools to become Eco-schools.
- Increase the profile of local businesses taking action to reduce carbon emissions through the establishment of Croydon Green Business Awards.
- Pilot social value leases on Council owned assets to incentivise the creation of social, local economic and environmental outcomes through a reduction in rent.
- Strengthening community-based organisations to enable them to support and scale action within their communities. Council to provide a flexible range of support for community led action, led by interests of local groups, including support to access small-scale funding.

Commissioner feedback: While there are frequent references throughout the draft to the need to engage with businesses and community groups, there is no mention of the need to engage with trade unions. This omission is especially notable in the section entitled *Getting People Involved*.

Survey feedback: There was broad support for the Commission’s recommendations around developing campaigns, promoting action across the community, and changing the narrative around climate change in the borough. On these recommendation’s there a much higher rate of ambivalence (i.e. respondents neither agreeing or disagreeing), possibly indicating again a lack of confidence in the ability of the Council and its partners to deliver such a campaign but very few respondents actively disagreed that this should be a focus for local stakeholders.

The scepticism reported above, in relation to the effectiveness of a local public campaign on climate change is underscored in questions on what initiatives respondents thought would work to get local residents and businesses taking action in the borough.

From the pre-determined options respondents were presented with, only around 25% of respondents saw a creative local public campaign as likely to be successful, compared to 36% who thought a schools focused campaign would be effective, and 50% who thought both better use of existing public and community spaces and green business awards would be effective.

Among the open ended responses on effective initiatives, there was strong support for programmes involving tree planting and restoring local green spaces. Perhaps the strongest message also coming out of the open-ended responses, however, was the need to get

consultation and community engagement right, when planning changes in people's local areas.

Annex 1 – Working Group Recommendations

HOUSING AND PLANNING: Accelerating the reduction of carbon emissions from buildings across the borough								
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Financial Cost to Council (Rating)	Supporting Behaviour Change	Carbon Saving (Rating)	Co-benefits
Reducing Carbon Emission from Buildings	<p>1. Develop a high profile campaign to reduce the emissions of all schools in Croydon to zero by 2025.</p> <p>Scale existing eco-schools programme. Establish yearly targets and provide co-ordinating support for all schools in Croydon to become an Eco-School by 2025 [see Awareness, engagement and communication]</p>	X	X	1-3 years	Upfront costs are likely to be recouped over a 20-30 year lifespan	X	Low	<p>A high profile cross-community campaign to decarbonise all schools by 2025 would build momentum and public engagement.</p> <p>Long-term savings on energy bills.</p> <p>Establish leadership of the Council on the topic for this sector. Requires close collaboration with academy trusts.</p> <p>Campaign could be led by Croydon Council or another body.</p>
	<p>2. Conduct detailed housing stock retrofit needs analysis</p>	X		1 year	Low		Enabling activity	Wider understanding of emissions sources in borough
	<p>3. Accelerate efforts to decarbonise social housing.</p> <p>Providing a pipeline of activity for local businesses.</p>	X		10 years	Significant up front capital costs but these can be shared with housing associations and built into existing maintenance budgets		High	A rapid, scaled-up, plan for decarbonisation of social homes will support a reduction of fuel poverty in the borough.

	4. Engage with local businesses on commercial building retrofit – explore tax-based incentives	X		1 year	Self-financing	X	High	Close engagement with existing business networks (some of which are already progressing in this area) such as Business Improvement Districts could help scale up action in this area.
	5. Engage with residents associations and particularly owners of apartment buildings on communal retrofit	X	X	1 year	Low		High	This agenda aligns with the existing need to regenerate low quality apartment buildings, addressing safety standards and fuel poverty. Building maintenance contracts can present obstacles which a third-party support facility could help residents to navigate.
Skills and Advice	6. Creation of a one-stop-shop for private retrofit advice, trusted traders, and accessing government grants	X	X	1-2 years	Setup and running costs likely modest, might be supported by grants/external finance	X	Enabling activity	Build trust and confidence in private home-owners and landlords to invest in their own retrofit. Access to government grants
	7. Creation of a retrofit academy in association with Croydon colleges	X	X	1-3 years	Funding to be sought from external stakeholders	X	Enabling activity	The academy can provide good quality education leading to good quality jobs in retrofit for residents in the borough
	8. Provide training and upskilling of current construction sector workers Social value commitments and other procurement provisions might be utilised, alongside closer working with local providers.	X	X	1 year	Government support needed	X	Enabling activity	Ensure good quality work and keep financial flows in the local area.

<p>Planning</p>	<p>9. Strengthen planning regulations to cut emissions from new developments and address key adaptation risks, including small scale builds.</p> <p>Develop a set of principles and regulations to ensure that additional homes do not compromise the commitment to a greener, cleaner and more attractive borough.</p>	<p>X</p>	<p>X</p>	<p>1-2 years</p>	<p>Low</p>		<p>Enabling activity</p>	<p>Croydon Council is implementing standards set out in the London Plan which will improve the climate change performance of major developments. However, gaps remain in the standards required of small-scale developments.</p>
------------------------	--	-----------------	-----------------	------------------	------------	--	--------------------------	--

TRANSPORT: Promoting public transport and active travel to become the natural first choice ³ .								
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Financial Cost to Council (Rating)	Supporting Behaviour Change	Carbon Saving (Rating)	Co-benefits
Reduce Traffic	<p>1. 15-minute city incorporated into Local Plan to reduce the need to travel</p> <p>Decentralised urban design approach which locates work, shops, and other services such as doctors within 15 minutes travel of peoples home by walking, cycling, or public transport</p>	X	X	Ongoing to 2030	Low	X	High	<p>Reduce travel</p> <p>Improve air quality</p> <p>Improve wellbeing</p> <p>Increased social cohesion</p>
	<p>2. Park and ride schemes to reduce vehicles entering central Croydon</p>	X	X	2-3 years	Medium-low	X	Low-medium	Reduce traffic in central Croydon and encourage more people to travel direct using public transport
	<p>3. 'School streets' - no parking near schools</p> <p>Introduced at all schools along with campaigns to encourage parents not to drive to schools</p>	X		1-2 years	Low	X	Medium	Improve air quality
	<p>4. School bus provision</p> <p>Use data from the Covid school bus provision to assess if school buses should run all the time.</p>		X	2-3 years	Cost borne by TFL	X	Low	Improve air quality

³ <https://www.urbantransportgroup.org/system/files/general-docs/Transport%20Decarbonisation%20Plan%20-%20UTG%20consultation%20response%20%28Aug%202020%29.pdf>

	5. Low-traffic neighbourhood – piloted in every ward and developed in consultation with residents and local business ⁴	X		2-3 years	Low	X	Low-medium	Reduce motor traffic, and in doing so, reduce air pollution, noise pollution and road accidents. Residential streets more pleasant, inclusive and safer for people to walk and cycle Reduce car ownership
	6. Lobby to extend ULEZ out to M25		X	3-5 years	Low		Medium	The Ultra-Low Emissions Zone is already being extended to the north and south circular.
	7. Lobby to introduce ‘road pricing’ instead of the congestion charge and extend it across all of London		X	5+ years	Cost borne by TFL		High	Reduce motor traffic Improve air quality Road pricing means that instead of a flat rate charge people will be charged based on the length of their journey and the emissions that vehicle produces.
Increase Cycling	8. Improve and extend cycle routes	X	X	Ongoing to 2030	(To be advised))	X	Low-medium	Develop a coherent and contiguous set of cycle routes to connect all of Croydon. Consideration of running cycle lanes alongside tram routes and/or railways lines
	9. Increase access to cycle storage	X		Ongoing to 2030	Low	X	Low-medium	Increase safety for cyclists
	10. Cycle lane safety – cycle lanes to be marked with hedges / planters instead of lines of paint	X	X		Low	X	Low	Increase safety for cyclists, reduce street level pollution, improve our streetscapes

⁴ Noted that since this recommendation was developed, residents’ concerns in Crystal Palace have led to a change in approach. The Awareness Working Group discussed this intervention as an example of what can go wrong when the community is not engaged appropriately. This recommendation will be developed to clarify the engagement required. <https://wp.croydon.gov.uk/newsroom/report-recommends-replacement-low-traffic-neighbourhood-scheme/>

Public Transport	11. More affordable public transport		X	1-2 years	Cost borne by TFL and/or national government	X	Medium	Encourages people who have cars to use them less Reduces the travel costs for people.
Private Cars	12. Rapid public charging points for electric cars and vans installation - ensure current commitment of 400 public charging points by 2022 is delivered and extended to improved access to rapid public charging points. ⁵	X	X	On-going to 2022	(To be advised on current financial commitments / cost)	X	Low	Improve air quality
	13. Subsidise electric vehicles – charging, parking.	X	X	Immediate	Low		Low	Improve air quality
	14. Reduce number of parking spaces across the borough Targeting areas of low air quality first	X		Ongoing to 2030	Low		Low-medium	Less public space for parking will reduce car ownership and traffic.
	15. Increase access to electric hire car hubs		X	Ongoing to 2030	Low	X	Low-medium	Improving air quality
Measuring Progress	17. Measure air quality across borough at key intervention areas. Publically report findings	X	X	Ongoing to 2030	Low		Enabling activity	

⁵ <https://www.croydon.gov.uk/transportandstreets/charging-points-for-electric-cars-and-vans>

ENERGY: Changing energy use across the borough.

Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Financial Cost to Council (Rating)	Supporting Behaviour Change	Carbon Saving (Rating)	Co-benefits
Renewable Energy	1. Increase Croydon production of renewable energy by 10% every year Council/London-owned energy company and/or supporting individual and community renewable energy installation (e.g. Solar panels).	X	X	Ongoing to 2030	Low – Cost if Council owned installation	X	High	Skill training Job creation.
	2. Resident Switching Campaign- publicise renewable energy percentage of energy providers to inform residents/ local business switching	X		Immediate	Low	X	Enabling activity	
	3. Croydon Council switch to renewable energy only supplier across all Council owned assets	X		Immediate – 1 year (tbc if purchasing power agreements in place)			Medium	
Energy Efficiency	4. Reduce energy use in households One-stop shop advice on actions / funding sources (Insulation, boiler replacement)	X	X	Ongoing to 2030	Low	X	High	Local business Potential for job creation.

	5. Campaign to encourage resident / local business switch from gas to electricity for heating/cooking			Ongoing to 2030	Low	X	Medium	
	6. All new builds meet highest energy efficiency standards [see Housing and Planning recommendation 9]	X		Ongoing to 2030	Low		Medium to high	

JOBS, SKILLS AND EMPLOYMENT: Promoting green jobs and skills

Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Financial Cost to Council (Rating)	Supporting Behaviour Change	Impact (Rating)	Co-benefits
Skills strategy	<p>1. Council develop a medium-term plan to identify the pipeline of future good green jobs in the Borough.</p> <p>Including</p> <ul style="list-style-type: none"> • large-scale adoption of energy efficient buildings [see Housing and Planning recommendation 9] • alignment with investments in carbon neutral innovation 	X	X	1 year	Low in development. There may be a cost of implementation	X	Enabling activity	<p>Supports the delivery of green infrastructure and work, towards long term ambition.</p> <p>Provide appropriate engagement and leadership to businesses in the Borough.</p> <p>Local jobs</p>
	<p>2. Croydon Works supported to promote jobs in a changing climate, including new vacancies which are</p>	X	X	1-2 years	Low in development.		Enabling activity	

	arising in the COVID economy, and in relation to the labour market in neighbouring Boroughs				Cost of implementation			
	3. Improve skills gaps information - Including questions in business surveys to ensure Council and colleges have information about emerging skills needs and gaps.	X		1 year - ongoing	Low		Enabling activity	
Procurement	4. Harnessing anchor institution spending to strengthen the Croydon economy. Council and local anchor institutions to use procurement to support high quality, local jobs – E.g. Good Employer Charter Croydon developed to reflect sustainability ambitions.	X	X	2-3 years	Low		Medium	Local jobs
Business Training	5. Skills contact point Removing barriers for businesses to support training by creating a single point of contact to speak to about skills needs and support	X	X	2-3 years	Low	X	Medium	

ADAPTATION AND RESILIENCE: Developing a borough programme that embeds adaptation practices in all the Council's work								
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Financial Cost to Council (Rating)	Supporting Behaviour Change	Impact	Co-benefits
Adaptation Assessment	1. Conduct a thorough assessment of the current landscape for climate adaptation in Croydon , how risks will evolve in future, what are the co-benefits and issues of social justice, what is within Croydon's control and what needs national support.	X		1 year	Low		Enabling activity	
	2. Develop climate adaptation pathways for Croydon outlining current and future climate risks, and including a climate change risk assessment to understand current level of risk and vulnerabilities (e.g. including considering overseas risks), and drive action and communication	X		1 year	Low in development. There may be a cost of implementation		Enabling activity Reduce risks	
Adaptation Programme	3. Develop and implement a broad programme of activities on climate adaptation that engages widely across the Council to facilitate embedding adaptation practices in all of the Councils' work. Create a map of policies and strategies being updated in the short term as opportunities to embed adaptation. This programme should include a timeline, with clear responsibilities and	X		1 year for development Ongoing implementation Immediate	Low in development. There may be costs of implementation		Enabling activity Implementation leads to reduction of risks: flooding, high temperatures, water supply, natural capital	Reinforcing actions through Council strategies

	acknowledgement of who will cover the costs						
Best practice	4. Contribute to a broader knowledge exchange exercise with other Councils / GLA to learn from their experience, share best practice and assess opportunities for collaboration.	X		2-3 years	Low		Enabling activity

AWARENESS, ENGAGEMENT AND COMMUNICATION: Accelerating action in communities across the borough							
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Financial Cost to Council (Rating)	Supporting Behaviour Change	
Raising Awareness Across the Borough • Climate change • Action you can take	1. Positive framing borough wide campaign - the climate emergency as a challenge that we can respond to. Campaign to operate at different levels <ul style="list-style-type: none"> ○ Top level messaging – ‘Croydon is taking on the challenge’ ○ Sector level messaging promoting action on Commission recommendations e.g. Builders are taking on the challenge "We're teaching new skills to take on the challenge Community level messaging highlighting locally based organisations e.g. <ul style="list-style-type: none"> ○ Addington Community Group is taking on the climate challenge ○ Crystal Palace Transition Town is taking on the climate challenge ○ Families are taking on the climate challenge ○ Harris Academy is taking on the challenge 	X		1 year ongoing	Low	X	
	2. Croydon residents: Amplify: Promote existing national campaigns targeting increasing awareness of action you can take personally which is consistent with the borough wide campaign.		X		1 year-ongoing	Low Co-ordination costs for locally	X

	<p>Promote resident energy switching campaign to renewable suppliers</p> <p>Encourage resident / local business switch from gas to electricity for heating/cooking</p> <p>Regular reporting on borough progress using existing mechanisms in an easy accessible form (e.g. council tax bills, social media)</p> <p>Scale: Local campaigns and existing action by promoting / sharing good practice /learning between local groups.</p> <p>Innovate: Support local innovation in raising awareness through the provision of small seed-funding grants to locally-based organisations / residents to develop and deliver effective/creative local campaigns to promote action on Commission recommendations:</p> <ul style="list-style-type: none"> ○ Climate ready homes ○ Getting around ○ Green skills and jobs ○ Getting people and businesses involved 				based organisation	
	<p>3. Develop a high profile campaign to reduce the emissions of all schools by 2025</p>	X	X	1-3 years		X
	<p>4. Businesses:</p> <p>Amplify: Using existing business networks to raise awareness of the action local businesses can take.</p>					
	<p>5. Council:</p> <p>Staff insight sessions – promoting joined up strategy and improving intervention delivery. Priority areas informed by map of policies and strategies that are being updated in the short term [see Adaptation recommendation 3]</p> <p>Council co-ordination - Create a senior-level resilience officer with cross-Council responsibility for implementing actions and ensuring all Council activity works to support the net zero target.</p>	X		1-2 years	Low	

Increasing Engagement Across the Borough: <ul style="list-style-type: none"> • Getting involved • Taking action 	6. Schools: Amplify: Promote existing school schemes providing practical advice to schools to reach zero carbon ⁶ ; and education materials ⁷ Campaign to encourage parents not to drive to schools Scale: Scale existing Eco-schools programme. Establish yearly targets and provide co-ordinating support for all schools in Croydon to become an Eco-School by 2025 [see Housing and planning recommendation 1]	X	X	1-3 years	Low	X
	7. Businesses: Amplify: Green Business Award Increase the profile of local businesses taking action to reduce their carbon emissions. Innovate: Pilot social value leases on Council owned assets to incentivise the creation of social, local economic and environmental outcomes through a reduction in rent	X	X	2-3 years	Low	X
Community-based organisations	8. Support community-based organisations to promote action within their communities Scale: Council to provide a flexible range of support for community led action, led by interests of local groups, including support to access small-scale funding.		X		Low	X
Measuring and Reviewing Progress	9. Create a set of simple, understandable measures to chart progress in tackling the climate emergency in Croydon. These measures should be accessible to Croydon residents and businesses to enable the Council to be held to account for progress. 10. Establish a clear and understandable baseline for carbon emissions in the borough and prepare a roadmap of required reductions to meet the net zero by 2030 target.	X		1 year - ongoing	Low	Enabling

⁶ Ashden campaign to support all schools reach zero carbon <https://letsgozero.org/>

⁷ Education for Sustainable Citizenship
<http://www.omep.org.uk/omep-uk-early-childhood-sustainable-citizenship-award/#>

	<p>11. Community events to review progress and hold the Council to account.</p> <p>The Citizen’s Assembly allowed different groups to come together and identify recommendations, this process can be used going forward to review actions.</p>					
--	--	--	--	--	--	--

Annex 2: Examples of Awareness, Engagement and Communication interventions

Focus	Stakeholder	Amplify	Scale	Innovate
		<p>Promote existing national campaigns</p> <p>Amplify existing action in Commission recommendations:</p> <ul style="list-style-type: none"> ○ Climate ready homes ○ Getting around ○ Green skills and jobs ○ Getting people and businesses involved 	<p>Local campaigns and existing action</p> <p>Scale action in Commission recommendations:</p> <ul style="list-style-type: none"> ○ Climate ready homes ○ Getting around ○ Green skills and jobs ○ Getting people and businesses involved 	<p>Support local innovation, piloting Croydon specific interventions</p> <p>Promote innovation in Commission recommendations:</p> <ul style="list-style-type: none"> ○ Climate ready homes ○ Getting around ○ Green skills and jobs ○ Getting people and businesses involved
<p>Awareness raising:</p> <ul style="list-style-type: none"> • Climate change • Action you can take – changing behaviours 	<p>Residents</p>	<p>1. Using existing community / public space to raise awareness and provide everyday visual cues to support behaviour change E.g.</p> <p>Have a few big digital screens specifically devoted to “The future of Croydon”</p> <p>Use empty shops as venues to highlight campaigns and actions people can take.</p> <p>La mer commence ici” / “The sea starts here” – labelling on road drains and awareness materials to raise awareness of waste disposal.</p> <p>2. Support residents to identify actions they can take which are achievable. E.g.</p> <p>Identify a range of actions which are Easy, Attractive, Social and Timely. ⁸</p>	<p>8. Scale local campaigns and existing action by promoting / sharing good practice /learning between local groups. E.g.</p> <p>Map local groups and develop an online resource of groups across the borough.</p> <p>Promote existing group activities</p> <p>Develop online activities to share and document examples of good practice / lessons between groups.</p> <p>9. Develop packages of materials to support groups not currently engaged in action to discuss importance of zero carbon and actions they can take</p>	<p>11. Support local innovation in raising awareness through the provision of small seed-funding grants to locally-based organisations / residents to develop and deliver effective/creative local campaigns to promote action on Commission recommendations. E.g.</p> <p>Street art festival</p> <p>“The future of Croydon” theme</p> <p>Brit School Work on a project around the future of Croydon</p> <p>Ecoembes” App:. Every time a “green action” is taken or visit a green business points are accumulated</p>

⁸ The Little Book of Green Nudges <https://www.bi.team/wp-content/uploads/2020/09/LBGN-2.pdf>

		<p>Promoting personal action through carbon calculators which make actions clear and achievable https://www.cat.org.uk/info-resources/free-information-service/green-living/carbon-calculators-ecological-footprints/</p> <p>3. Regular reporting on borough progress using existing mechanisms in an easy accessible form. E.g.</p> <p>Using Council Tax payment forms to report on progress to carbon zero and show case examples across the borough.</p>		
	Schools	<p>4. Develop a high profile campaign to reduce the emissions of all schools in Croydon to zero by 2025.</p> <p>Engagement with schools , sharing existing resources / materials e.g.</p> <ul style="list-style-type: none"> • Ashden campaign to support all schools reach zero carbon https://letsgozero.org/ • Education for Sustainable Citizenship http://www.omep.org.uk/omep-uk-early-childhood-sustainable-citizenship-award/# • Eco schools https://www.eco-schools.org.uk/ 		
	Businesses	<p>5. Using existing business networks to raise awareness of the action local businesses can take. E.g.</p> <p>Provide business inductions and advice sessions.</p>	<p>10. Promote action taken by businesses in Croydon. E.g.</p> <p>Croydon Green Business Awards</p>	
	Council	<p>6. Promoting joined up strategy and improving intervention delivery across the Council. E.g.</p> <p>Staff insight sessions – promoting joined up strategy and improving intervention delivery. Priority areas informed by map of policies and strategies that are being updated in the short term [see Adaptation recommendation 3].</p>		

Focus	Stakeholder	Amplify	Scale	Innovate
Engagement: <ul style="list-style-type: none"> • Getting involved • Taking action 	Residents	12. Promote actions taken by residents across the borough	16. Support the development of community support infrastructure. E.g. Funding to support the infrastructure of local action groups Develop a champion network of local community activists	
	Schools	13. Promote actions taken by schools across the borough	17. Scale existing Eco-schools programme. Establish yearly targets and provide co-ordinating support for all schools in Croydon to become an Eco-School by 2025	
	Businesses	14. Promote actions taken by businesses across the borough 15. Incentivising green business behaviour. E.g. If businesses meet certain green standards they receive free advertising.		18. Pilot social value leases on Council owned assets to incentivise the creation of social, local economic and environmental outcomes through a reduction in rent



THE CROYDON CLIMATE CRISIS COMMISSION REPORT

March 2021

**Supported by the
New Economics Foundation**

CONTENTS

Chair’s foreword.....	3
Commission members	4
Executive summary.....	5
Introduction	7
State of play.....	9
Carbon emissions in Croydon.....	9
Adaptation risks in Croydon.....	111
Ecological challenge.....	133
Who is most affected?	133
Action already underway	14
Priority areas for action.....	16
Getting the groundwork right.....	17
Headline recommendation: Measures of success.....	17
Recommendations.....	17
Driving a green economic recovery	21
Headline recommendation: Community wealth building.....	21
Recommendations.....	22
Greening our neighbourhoods.....	24
Headline recommendation: Low-traffic neighbourhoods	24
Headline recommendation: 15-minute city.....	24
Recommendations.....	26
Getting people and businesses involved	29
Headline recommendation: High-profile school campaigning.....	29
Recommendations.....	30
Achieving the scale of change.....	31
Recommendations.....	31
Appendix 1: Recommendations	33
Appendix 2: The Croydon Climate Crisis Commission terms of reference	50
Appendix 3: Members of the Commission’s working groups	54

CHAIR'S FOREWORD

The work of this Commission has taken place in an extraordinary year that has turned the world as we know it upside down. It has been a stark reminder of the profound impact that natural crises can have on every aspect of our lives if we do not prepare or respond. The parallels with climate change are clear. And if there was any doubt or hesitation about the urgency to act, the last year has been a sobering wake-up call. But it has also been a source of hope and a testimony to the power of collective action in overcoming the greatest challenges. We have achieved the impossible in a year: from unprecedented levels of government support into the economy, to the scientific breakthroughs that produced vaccinations in record time, to the pace of the vaccine roll-out. And in here are profound lessons for how we must respond to tackle the climate emergency.

Against this backdrop, the task of our Commission was clear: to provide practical recommendations for delivering a step change in Croydon's transition to net zero by 2030. But the Commission was also clear that simply transitioning to net zero at pace is not enough. We need a pathway to a green future that is fair and just; one that creates jobs, lifts living standards, and improves our communities.

The urgency of the moment is clear. This is a time for bold action. But delivering this is not the remit of any one part of Croydon alone. It must be shared and owned by all parts of Croydon's resourceful and vibrant community from the Council to the health service, schools, colleges, local businesses, trade unions, and residents. This report provides a useful first step as partners in Croydon embark on this journey together.

I thank my fellow commissioners for their tremendous work – a fantastic group of people with great expertise and a belief in Croydon. They have devoted many hours to this task with great thoughtfulness, passion, and commitment. All of our work has been conducted remotely but we have come together as a team and found common ground. Thank you, too, to the amazing team at the New Economics Foundation, whose support has made this work possible.

Finally, to everyone who reads this report and joins our collective effort to reach net zero by 2030, thank you for playing your part in making this ambition a reality.

Miatta Fahnbulleh

COMMISSION MEMBERS

Members of the Croydon Climate Crisis Commission:

Chair: Miatta Fahnbulleh	Chief Executive, New Economics Foundation
Cllr Muhammad Ali	Croydon Council
Cllr Nina Degrad	Croydon Council
Dr Martin Graham	Croydon TUC
Ann-Christine Harland	Vice-Principal Finance & Resources, Croydon College
Cllr Simon Hoar	Croydon Council
Candice Howarth	Senior Policy Fellow – Place-based Climate Action Network (PCAN), Grantham Research Institute on Climate Change and the Environment, London School of Economics
Ian Morris	Croydon Voluntary Action
Nkemdilim Onyiah	Croydon Citizens' Assembly
Silvia Sanchez	Croydon Citizens' Assembly
Russell Smith	Founder, Retrofit Works
Esther Sutton	The Oval Tavern
Jonathan Sharrock	Chief Executive, Coast to Capital Local Enterprise Partnership
Peter Underwood	Croydon Friends of the Earth

The Commission thanks members of the working groups for their insights throughout the process, members of the Croydon Citizens' Assembly and Croydon residents and businesses whose comments have helped to shape the recommendations. Thanks also go to colleagues from the New Economics Foundation for their co-ordination support to the Commission and working groups.

EXECUTIVE SUMMARY

The challenge

The time for action has never been as urgent. The clock is ticking on climate change and our ability to stem the worst impacts of a warming world. As we recover from the Covid-19 pandemic, we need to ensure that we are building an economy fit for the future. In the transition to zero carbon we need to be mindful that we are designing an economy that is fair and just, providing good quality jobs, improving wellbeing, and reducing inequality for people in our communities.

As a large urban borough of London, Croydon has a key part to play in contributing to tackling the climate crisis. Croydon's emissions are above the median for London boroughs. Many residents in the borough are employed in carbon-intensive industries like freight transport and civil engineering. Simultaneously, Croydon faces climate risks such as overheating due to the urban heat island impact and flooding. The borough has a history of flooding that will likely worsen as Croydon is ranked the fourth settlement in England most susceptible to surface-water flooding. Additionally, Croydon's expanses of green and open spaces are threatened by development and growth pressures and must be protected to enhance and conserve biodiversity.

In 2019, it was estimated that for Croydon to stay within its carbon budget it would need to deliver the majority of carbon cuts over the next ten years.¹ The analysis also showed that while Croydon could close the gap between its projected emissions in 2050 and a net-zero target by 61% through the adoption of options already available, more innovative options would be required to deliver the last 39%.

In the process of simultaneously reducing emissions while preparing the borough to adapt to climate risks, the Council must remain aware of people's differing social vulnerabilities to the climate change crisis and seek to implement focused policy solutions that reflect the demographic, social, and environmental contexts of its populace.

Our recommendations

Croydon Council needs to show leadership and establish a clear route to drive rapid reductions in carbon emissions from activities in the borough of Croydon to become carbon neutral by 2030. It cannot achieve the scale of change required within the necessary timeframes without the whole system working together: education, skills, and wider public sector organisations; businesses, employees, and trade unions; the community and voluntary sector; and local residents.

Our recommendations focus on 5 interconnected priority areas for action (Figure 1), with 23 associated actions which, in some cases, are foundational steps in this journey. A summary of recommendations is provided in Appendix 1.

Figure 1: Five priority areas for action



INTRODUCTION

Independent Climate Crisis Commission

In June 2019, Croydon Council declared a climate and ecological emergency and undertook to implement a process for acting on this declaration by commissioning a climate Citizens' Assembly and developing an independent Climate Crisis Commission. The Commission was launched in March 2020 shortly before the country entered lockdown in response to the Covid-19 pandemic. Croydon Council partnered with the New Economics Foundation (NEF) to set up and support the Commission. The Commission built on the work of the Croydon Citizens' Assembly, which concluded in March 2020.

The vision of the Commission is to drive rapid reductions in the carbon emissions from activities in the borough of Croydon, with the intention of becoming carbon neutral by 2030. Critically, the Commission aims to ensure the transition to zero carbon happens in a fair and just way, providing good quality jobs, improving wellbeing, and reducing inequality. The Commission's short-term purpose was to identify priority areas for action, developed with the people of Croydon, to show how the borough of Croydon could become carbon neutral by 2030. The Commission has considered in its recommendations how an independent body can be established to hold the Council to account for the delivery of the proposed action plan.

The Commission's independence means that it sits outside the Council's formal decision-making structures. This allows the Commission to consider and challenge Council activity, as well as take a broader view of the action that is needed to achieve the carbon neutral target, which may lie outside the current powers of the Council.

The Commission had expected the Council to engage widely on the draft recommendations emerging from the discussions in the working groups before the finalisation of this report. The Covid-19 pandemic and the Council's current financial situation has meant that the engagement activities to date, namely discussions in the working groups and with Croydon Citizens' Assembly members, and an online public survey,ⁱ can only be considered the start of an engagement process to shape these recommendations for action.

Croydon Council needs to show leadership to address the climate and ecological crisis we face, but it cannot achieve the scale of change required within the necessary timeframes without a broad alliance of partners working together. What is needed going forward is to forge alliances with a diverse range of groups and stakeholders across the borough: education, skills, and wider public sector organisations; businesses, employees, and trade

ⁱ The Council conducted an online survey to collect views on the initial recommendations from the Commission during a two-week period (survey closed 9 February 2021). Of the 465 people submitting responses 69% are residents of Croydon. The majority of the remaining group either work in Croydon or live very close to its administrative boundary. Respondents came from the majority of Croydon's boroughs; however 54% of respondents came from just two wards: Crystal Palace and Upper Norwood, and South Norwood. Respondents who reported their demographic data were slightly more likely to be female (60% of respondents) and respondents were most likely to be middle aged. Only 4% of respondents were under the age of 30 and only 4% were over the age of 71. As data from 2019 suggests 38% of the population of Croydon is under the age of 30, and around 9% over the age of 71, the respondent sample cannot be treated as statistically representative of the Croydon population.

unions; the community and voluntary sector; and local residents. Throughout the recommendations the Commission has emphasised the need to co-design activities with a broad range of stakeholders in the borough. We believe that this is the only way the scale of this challenge can be addressed.

The terms of reference for the Commission are detailed in Appendix 2.

STATE OF PLAY

The declaration of a climate and ecological emergency is underpinned by scientific evidence that calls for rapid reductions in global greenhouse gases if we are to limit average levels of warming to 1.5°C, and avoid the risks associated with dangerous climate change. The Intergovernmental Panel on Climate Change (IPCC)² has stated that we are close to using up the global ‘budget’ of greenhouse gases that society must stay within to limit warming to 1.5°C and in doing so prevent catastrophic climate breakdown.

The task facing Croydon in making its contribution to tackling this global challenge is illustrated in this section focusing on carbon emissions, climate change adaptation, and the ecological status across the borough. At the time of writing this report, detailed data specific to Croydon was not available, including a baseline assessment of the borough’s carbon emissions. The need to address the lack of data on both adaptation risks and carbon emissions specific to Croydon is addressed in our recommendations.

Carbon emissions in Croydon

The widely used accounting tool for greenhouse gases is the Greenhouse Gas Protocol.³ It splits greenhouse gases into three different categories or ‘scopes’, as indicated in Table 1.

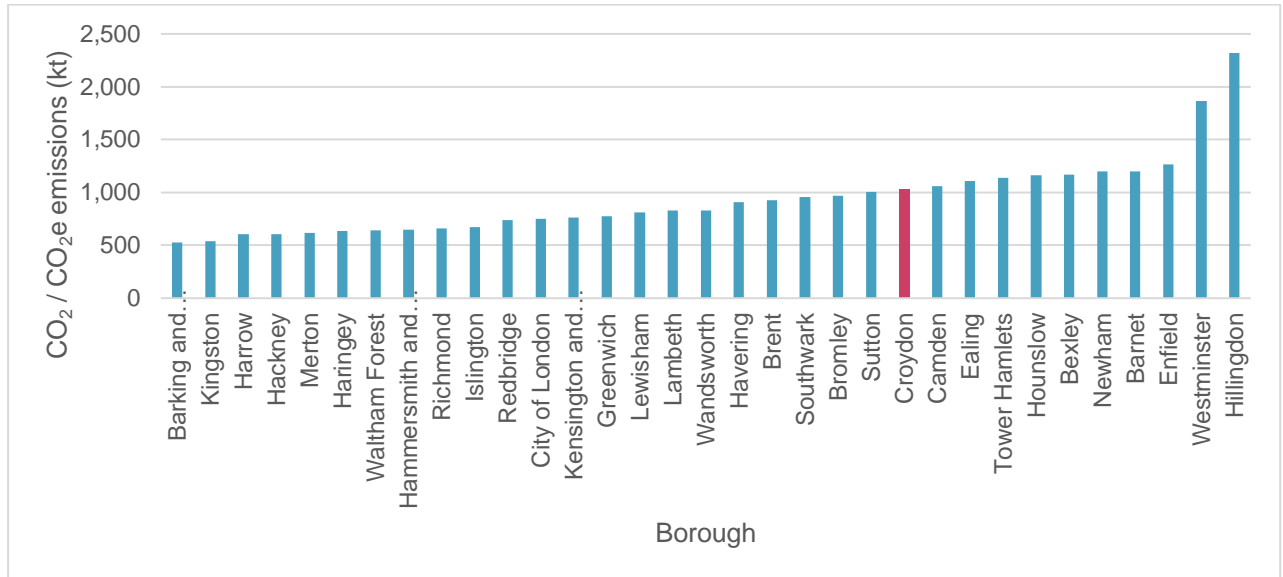
Table 1: Greenhouse Gas Protocol Scopes

Scope 1	Direct emissions from owned/controlled assets
Scope 2	Indirect emissions from purchased energy
Scope 3	Value chain emissions (eg waste disposal or transportation)

In 2019, it was estimated that, due to a combination of increasingly decarbonised electricity supply, structural change in the economy, and the gradual adoption of more efficient buildings, vehicles, and businesses, Croydon’s Scope 1 and Scope 2 emissions had fallen by 45% since 2005. However, domestic emission sources, notably heating and powering homes, still made up approximately 46% of CO₂ emissions in Croydon, transport emissions made up approximately 24%, and industry and commercial emissions made up approximately 30%. Based only on the fuel and electricity used within its boundaries, Croydon’s current rate of carbon emissions is estimated at around 1.08 million tonnes [CO₂ equivalent (CO_{2e})] per year.⁴ The majority of all carbon cuts need to be delivered in the next ten years.

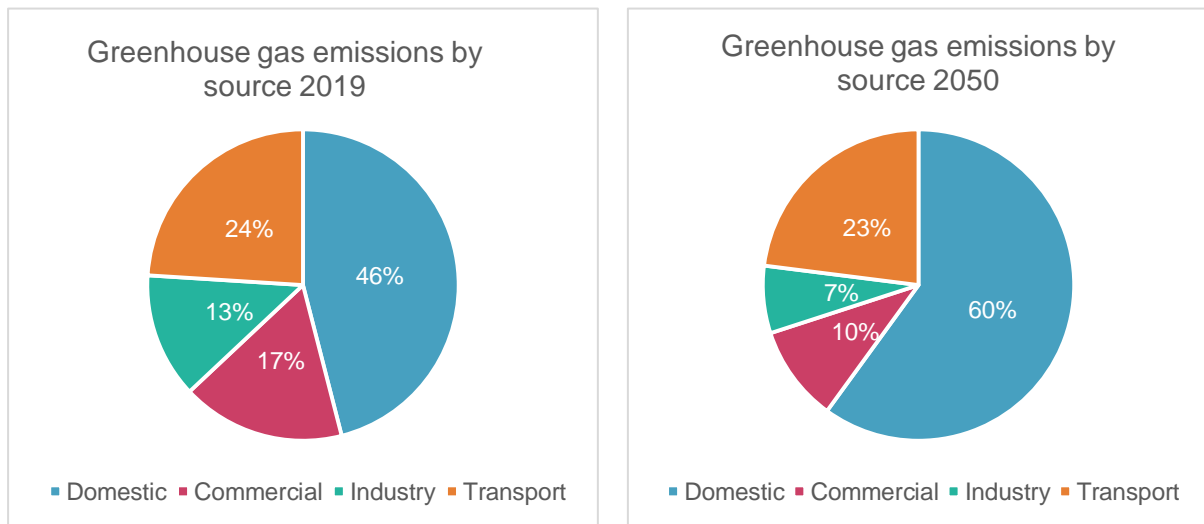
Compared to the other London boroughs, Croydon’s emissions are above the median, as Figure 2 illustrates.

Figure 2: CO₂ / CO₂e emissions by borough 2018⁵



Croydon has a significantly higher proportion of emissions from a domestic setting and a moderately higher proportion from transport, when compared to London’s total emission proportions (Figure 3).⁶ Without action, pre-existing industry trends are expected to increase the share of Croydon’s emissions associated with domestic activities to 60% by 2050, underscoring the importance of catalysing change in the residential sector.

Figure 3: Breakdown of CO₂/CO₂e emissions in Croydon⁷



A number of carbon-intensive sectors are significant employers in Croydon, as shown in Table 2. It should be noted that the distribution of the electricity sector will likely decarbonise to a degree as renewable energy capacity is expanded.

Table 2: Top six highest carbon employment sectors employing over 100 people in Croydon⁸

Sector	Total Jobs
Distribution of electricity	600
Collection of non-hazardous waste	350
Taxi operation	300
Construction of roads and motorways	150
Construction of other civil engineering projects	900
Freight transport by road	400

Gouldson, Sudmant, and Duncan (2019) found that while Croydon could close the gap between its projected emissions in 2050 and a net-zero target by 61% through the adoption of options that are already available, more innovative options would be required to deliver the last 39%.⁹

At the time of writing this report, the Council was unable to provide a breakdown for emissions across its activities and estates.

Adaptation risks in Croydon

The ambition stated in the *London Environment Strategy*¹⁰ is that “London and Londoners will be resilient to severe weather and longer-term climate change impacts. This will include flooding, heat risk and drought.” Changes to the climate are expected to result in seasonal changes, with summers generally becoming drier and winters wetter. More intense storms are expected to increase the risk of flooding, especially surface-water flooding, and there is a higher risk of drought in London due to less water being captured in the summer, groundwater not being replenished during the winter, and greater demand for water during hotter periods. The Mayor of London provides several strategy documents to govern and guide responses to adaptation risks, including the *London City Resilience Strategy 2020*¹¹ and the *London Plan 2021*¹².

The adaptation risks in Croydon highlighted in this section are overheating and flooding.

Overheating

Yearly, there are 2,000 heat-related deaths in the UK and 20% of homes in England already overheat.¹³ Awareness of the health risks of overheating is low; therefore public demand for change is low, also. Overheating also results in increased energy consumption due to the use of air-conditioning systems. Croydon, like other boroughs in London, is particularly at risk of overheating due to the amplification of heat through the urban heat island impact, where dense human activities warm the surrounding environments. An urban heat island impact can add 5–6°C to the night-time temperatures experienced.¹⁴ For instance, in London’s city centre, the temperature at night is on average 4°C higher, with larger increases on hot nights.¹⁵

Farther out from the centre, Croydon’s risk from overheating is not as high; however, as the Greater London Authority’s (GLA’s) guide *Better Environment, Better Health* for Croydon illustrates,¹⁶ the northern parts of the borough have a higher risk, being more urban and

closer to central London. Temperatures are on average approximately 2°C higher than southern parts of the borough. This guidance only relates to the geographical spread of temperature and does not consider vulnerable populations, a comparison the Council should undertake to ascertain the extent of the risk.

Certain house types, for example old and small, top-floor flats with low solar protection, or new-build houses unsuited to extreme heat, are particularly susceptible to the effects of overheating. The Council should equally work to understand the susceptibility of commercial and domestic buildings in the borough.

To adapt to overheating, the Council can undertake the following:

- Modify surfaces and use green infrastructure, for example green roofs.
- Use ecology to enhance evaporation and shading. For example increase tree cover, safeguard mature trees, and provide green spaces.
- Insulate homes.
- Campaign for active travel that reduces the heat from vehicular use.
- Use the planning regulations to reduce the susceptibility of new-build properties to overheating.

Flooding

As the climate crisis worsens, the UK, including London, will experience heightened risk of flooding. Croydon has a history of severe flooding; in 2014, for example, Purley and Kenley were significantly flooded due to extremely high groundwater. Croydon's risk of flooding is primarily from surface-water and groundwater sources; the borough is ranked the fourth settlement in England most susceptible to surface-water flooding.¹⁷ Risk of fluvial flooding and reservoir inundation exists from sources like the River Bourne and Norwood Lake, respectively.

The Environmental Agency has three zones of flood risk with Flood Zone 3 being designated for areas most likely to flood. The distribution of Croydon's properties by zone are detailed in Table 3.

Table 3: Properties at risk of flooding in Croydon¹⁸

Flood Zone	Residential Properties	Non-residential Properties	Unclassified Properties
1	144,140	6,149	8,649
2	1,030	113	107
3	4,148	428	341

Foundational to the understanding of this risk is the Council's *Strategic Flood Risk Assessment*¹⁹, a detailed assessment of flooding risk for Croydon. The Council's response to flooding emergencies is governed by the *Multi-Agency Flood Response Guidance*²⁰ prepared by the Croydon Resilience Forum. This guidance details the roles and responsibilities and approach to tackling flooding in the borough, involving a variety of

stakeholders (eg Environment Agency, the Metropolitan Police Service, and London Fire Brigade). The has set procedures for different response processes.

Ecological challenge

Known for its open space, one-third of Croydon is designated as Green Belt. Ecologically, the northern parts of the borough have fewer green spaces, whereas the southern portions of the borough, particularly due to their proximity to Green Belt land, have a richer spread of green spaces. There are 74 Sites of Nature Conservation Importance (SNCI) that are predominately spread from the east to the south of the borough. Recently, development and growth ambitions have been pressurising the integrity of these green spaces and risk fragmentation.

Croydon Council has habitat action plans for the major ecological habits in the borough (eg heathlands and woodlands).²¹ These action plans set out the extent of the habitats in the borough, and actions to conserve the quality of these ecologies and promote awareness.

Additionally, the *Croydon Local Plan* promotes and protects biodiversity, namely through the proposed delivery of a Green Grid, a network of multifunctional open spaces (Figure 4). This Green Grid will provide green space to the borough’s residents, while enhancing biodiversity and protecting fragile areas of nature. Incorporated into the Green Grid are Croydon’s 74 SNCI that are similarly protected by the Local Plan.

Figure 4: Croydon Local Plan’s Green Grid



Who is most affected?

Covid-19 has brought into sharp focus the inequalities that exist in our communities. Research confirms that the health and economic impacts of this pandemic are further widening those inequalities.

Although climate change, like Covid-19, impacts everyone, some people have the potential to be more impacted by its effects. A considerable determinant is social vulnerability, individuals’ ability to cope with extreme events, and adaptation risks. Social vulnerability is primarily a result of the following²²:

- Demographics (eg age and health)
- Environmental context (eg housing quality and proximity to green space)
- Social and institutional factors (eg inequality, social capital, and social cohesion)

As such, increased social vulnerability is increasingly present in the following groups:

- People with mobility issues
- Older people
- People with poor health

Climate responses must be designed and implemented within an understanding of these social vulnerabilities, adjusting policy and actions so that responses are tailored to the context of the areas and citizens.

Action already underway

Council-led actions

Croydon Council is already undertaking several initiatives to tackle the climate crisis, both to adapt to the climate crisis and reduce emissions. This activity is driven by and principally set out within Croydon's *Climate Change Adaptation Action Plan (2010)*.²³

Emission reducing actions include the following:

- Committing to install 400 electric vehicle charging points by 2022.²⁴
- Launching a School Streets initiative that encourages the use of cycling and walking by placing restrictions on road travel during pick-up and drop-off times on the streets proximate to certain schools.²⁵
- Scaling the cost of parking permits, providing discounts for less polluting and greener vehicles.²⁶
- Providing 'Bike Hangar' cycle storage in council estates and roads.
- Delivering new cycle routes. Further cycle and active travel improvements are proposed in the Council's *Liveable Neighbourhood* designs.²⁷
- Committing to plant 3,500 trees by 2023, including installing 60 new planting bays alongside roads in the borough's neighbourhoods.²⁸
- Piloting a low-traffic neighbourhood in Crystal Palace to promote active travel.
- Producing an *Air Quality Action Plan*²⁹ to tackle air pollution in the borough, between 2017 and 2022. This plan has actions for a variety of different areas, including emissions from buildings, public health and awareness raising, and localised solutions.
- Launching a revolving Green Croydon Fund to fund projects, activities, and initiatives that promote environmental protection, green living, and sustainability. Approximately £250,000 is available per year, with a maximum funding allocation of £50,000.³⁰ The fund is currently closed while resources are pooled into the Council's Covid-19 Emergency Fund.

- Installing a pilot ground-source heat pump at a Council-owned estate in New Addington, which should reduce emissions and improve air quality, while simultaneously addressing fuel poverty.

Adaptation actions include the following:

- Introducing climate control to Council-run passenger vehicles for temperature reduction in hot weather.
- Starting to actively collect rainwater to remedy the ecological risk of periods of drought and dry weather.
- Training more drivers of gritting vehicles and introducing a three-shift system to increase standby capability and flexibility.
- Requesting water-resistant planting where possible within planning applications and actively encouraging green roofs.
- Incorporating climate change adaptation features, for example flood resilience, in all new Council stock.
- Promoting the use of heat wave action plans for businesses and communities.

*Croydon Local Plan 2018*³¹ has an array of measures to tackle the climate crisis. Most notably, Policy SP6 Environment and Climate Change seeks to ensure energy efficiency and emission reductions through sustainable design and construction, particularly through the scaled application of the Building Research Establishment Environmental Assessment Method (BREEAM)³² and the national technical standard for energy efficiency in new homes (2015). The policy also contains provisions for flood risk management and sustainable waste management. The *Local Plan* is further supported by the London Plan's policy provisions in relation to sustainability.

Other stakeholders

Other stakeholders in the borough are undertaking a range of initiatives and campaigns. The full extent of this activity is not documented; however examples include the following:

- Croydon Friends of the Earth – a campaigning group that advocates for local and national action and organises local initiatives. Croydon Climate Action Group, in partnership with Croydon Friends of the Earth, is working on local campaigns relating to climate change.
- Croydon Community Gardens – a selection of community gardens that cultivate local produce for residents across parks and green spaces in the borough.
- Croydon Ecology Centre – a volunteer-run centre that undertakes nature conservation and provides educational opportunities for young people.
- Croydon Reuse Organisation – an independent creative space that advocates for material reuse and provides learning opportunities in skills of reuse for all sectors of the community.
- Croydon Urban Mushrooms – an initiative that uses local waste coffee grounds as a substrate to grow mushrooms.

- Solo Wood Recycling – a social enterprise that works with wood that would otherwise go to landfill, reconditions the material and either sells it on as raw materials for DIY or building projects, or creates bespoke furniture.
- Crystal Palace Transition Town – a community organisation with a range of sustainability projects, for example community growing, food markets, transport group.
- Croydon Greenpeace – a campaigning group that advocates for a clean and peaceful world.
- Croydon XR – an environmental activist group.

Priority areas for action

The Commission's recommendations focus on 5 interconnected priority areas for action with 23 associated actions, which are described in the following sections.

- Getting the groundwork right
- Driving a green economic recovery
- Greening our neighbourhoods
- Getting people and businesses involved
- Achieving the scale of change

A summary of the expected impacts of the actions is provided in Appendix 1.

GETTING THE GROUNDWORK RIGHT

The Council will need to establish a strong alliance of partners and put in place effective support mechanisms and transparent decision-making processes to enable a one-Croydon approach to achieve net-zero carbon emissions in a way that is socially just and drives up living standards.

Headline recommendation: Measures of success

The Commission's recommendations cover a broad spectrum of climate adaptation and mitigation actions. Each recommendation must be implemented with a robust and effective action plan. Critical to this implementation is an ongoing monitoring of the Council's progress in tackling the climate emergency to ensure its actions are having an impact and delivering the required results.

This monitoring has two distinct elements. First, the Council must establish the baseline production and consumption-based carbon emissions in the borough (Scope 1, Scope 2, and Scope 3 emissions) and prepare a roadmap of the required reductions to meet the net-zero target by 2030. This baseline should accurately depict the detailed state of play of the borough's activities and will require a commitment of time and resources to achieve this. Secondly, the Council should create a set of simple, understandable measures of success to chart the progress of its actions and evidence the gains in comparison to the baseline. Measures should be regularly reported against and publicised widely to provide accountability and transparency of the Council's activities.

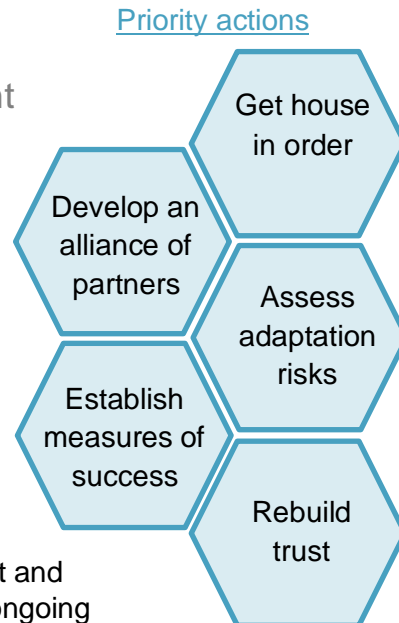
The Commission recommends that alongside these indicators documenting emission changes, the Council should concurrently create a set of indicators to evaluate the socio-economic impacts of the transition to net zero. For instance, measures that record social justice and local economic impact would ensure that the Council's conception of net-zero success combines a reduction of emissions with an improvement in community wellbeing, delivering positive social, economic, and environmental outcomes for the borough's residents. The Council must embed processes and procedures for evaluation with clear review points to ensure action plans can continuously adapt and improve.

Recommendations

To get the groundwork right, the Commission recommends that the Council addresses the following priority actions:

Recommendation 1: Rebuild trust with residents, community groups, trade unions, and businesses.

In particular:



- **Commit to deep ongoing engagement** with residents, community groups, workers, trade unions, and businesses to ensure initiatives aimed at reducing emissions and improving quality of life in the borough are genuinely **co-created**.
- **Host annual community events** to review progress and enable the community to hold the Council and other partners to account.
- **Formalise a climate panel**, with representatives from across the local area including a diverse group of residents, businesses, trade unions, and civil society organisations. The panel will hold the Council to account by conducting a yearly review of progress on the recommendations, and a three-year deep-dive review of the impact achieved and plans going forward. The business of the panel should be conducted as public hearings to ensure transparency, where Council leaders report on the progress of delivering a green transition in the borough.

Recommendation 2: Develop an alliance of partners to drive a green economic recovery across the borough.

In particular:

- Commit to establishing a one-Croydon approach to ensuring a green economic recovery by **building a broad alliance of partners** (including trade unions, businesses, civil society organisations, further education and skills providers, and other anchor organisations).
- **Create a collective plan of action** and establish ways of working together to deliver the plan.
- Support partners to **disclose their Scope 1–3 carbon emissions**, benchmark their progress, and share best practice.

Recommendation 3: Get the Council’s own house in order.

In particular:

- Appoint a **Councillor with responsibility for overseeing implementation** of the recommendations.
- Create a **senior-level resilience officer with cross-Council responsibility** for implementing actions and ensuring all Council activity works to support climate change adaptation and the net-zero target.
- Lead by example, including ensuring the Council’s **pension investment strategies** are in line with its declaration of a climate emergency.
- Establish a **clear strategy and timeframe for divesting** the Council’s pension scheme of fossil fuels and other high-carbon investments. Transparently report on the progress of this divestment publicly.

Recommendation 4: Tackle climate change adaptation risks across the borough.

In particular:

- **Develop climate adaptation pathways** for Croydon outlining the current and future climate risks. Include a climate change risk assessment to understand current levels of risk and vulnerabilities (eg including considering overseas risks) to drive action and communication.
- Conduct a thorough **assessment of the current landscape for climate adaptation in Croydon**. This should clearly state how risks will evolve in future and distinguish actions within the Council's direct control to influence, and actions that require the Council to lobby for national support.

Recommendation 5: Establish measures to chart the Council's progress against a clear and well-defined baseline position.

In particular:

- Establish a clear and understandable **baseline for production- and consumption-based carbon emissions** in the borough and prepare a roadmap of required reductions to meet the net-zero target by 2030. Consumption-based emissions should be made publicly available in a form to support local behaviour-change campaigns.
- Create a set of **simple, understandable measures of success and accountability indicators** to chart progress in tackling the climate emergency in Croydon through climate change adaptation and mitigation actions. The baseline should be made **publicly available**, and results regularly published in the interests of transparency.
- Include in the measures of success a set of **social indicators** that can monitor both the community grounding and social justice impacts of the transition to net zero.

Recommendation 6: Embed carbon reduction and climate adaptation in all the activities and strategies of the Council and its key partners.

In particular:

- Conduct a thorough **review of all current Council policies and strategies to ensure climate adaptation action is embedded**. Identify opportunities to embed adaptation action in policies and strategies that are being updated in the short term. Develop a plan of action with a clear timeline to embed adaptation action across all relevant policies and strategies.
- Conduct a thorough **review of existing Council strategies and plans to ensure they support the carbon reduction roadmap**, identifying co-benefits and revising those that are not aligned. This includes ensuring the economic strategy promotes a green economic recovery and strengthening planning regulations to cut emissions from new developments and address adaptation risks, including on small-scale builds.
- Conduct a thorough **review of all current Council activity** to ensure it is working to support the carbon reduction targets. Identify quick wins and longer-term changes in Council activity that can reduce the borough's carbon footprint.
- Conduct a thorough review of processes guiding the Council's engagement with external partners, including procurement processes, to ensure the **Council is encouraging and**

embedding measures of success consistent with the transition to net zero into partner and supplier agreements.

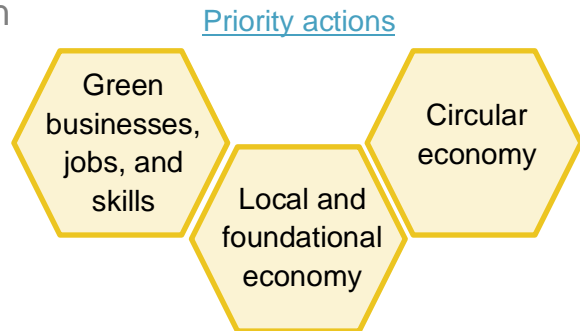
Recommendation 7: Contribute to a broader ongoing knowledge exchange.

In particular:

- Ensure ongoing **engagement with other councils and the Greater London Authority (GLA)** to continually learn from their experience, share best practice, and assess opportunities for collaboration.

DRIVING A GREEN ECONOMIC RECOVERY

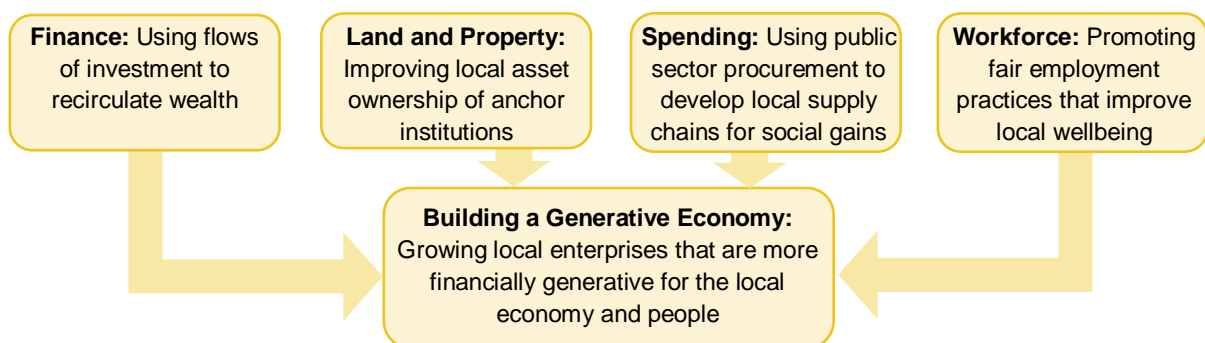
The Council needs to ensure Croydon residents have access to good quality jobs created through investments in green sectors. To ensure these green sectors flourish, the Council must help train workers and develop new skillsets across the borough. Equally, the Council needs to ensure the local economy is resilient, vibrant, and working for the residents of Croydon. Investing in a drive towards a circular economy will create new economic possibilities that design out waste, improve natural environments, and recirculate used materials.



Headline recommendation: Community wealth building

Community wealth building is a people-centred approach to economic development to create economies that redistribute wealth across communities. It cultivates local businesses that are generative creators of social value, reinvesting their wealth back into the communities they serve. Central to this approach is the use of anchor institutions, for instance universities or hospitals, who have an expected long-term presence in the borough and can use their spending and employment power to deliver local outcomes that promote a just and fair economy.

Figure 5: Pillars of community wealth building³³



Community wealth-building approaches are being pioneered across the country. For instance, Abram Ward Community Co-operative has championed a community wealth-building method to support local businesses. The Co-operative functions as an umbrella organisation supporting local residents to set up businesses by providing guidance, a joint marketing platform, or office space through a ‘Made in Wigan’ initiative, thereby acting as an anchor institution for local economic growth. Simultaneously, this initiative advocates for

stakeholders to buy local, assists in public sector procurement exercises, and supports local business-to-business trading.

The Commission recommends the Council engages with local anchor institutions, namely Council bodies, the NHS, education institutions, and larger employers, to create a joined-up community wealth-building approach. A critical tenet of this approach should be an agreed and implemented commitment to be a London Living Wage employer, and the intention to target investment and procurement spend to promote locally based green economic development and support new green businesses to start and thrive.

Recommendations

A principal objective of the Council should be to ensure that Croydon residents have access to good quality jobsⁱⁱ created through investments in green sectors. The Commission recommends that the Council addresses the following priority actions:

Recommendation 8: Promote green businesses, jobs, and skills in the borough.

In particular:

- Develop a medium-term plan to **identify the pipeline of future good quality green jobs** in the borough, and to identify and prioritise the skills needed to open up these opportunities to local people.
- Ensure workers who have been impacted by the Covid-19 pandemic, particularly those facing job loss, and sectors impacted by the need to decarbonise (eg aviation) are offered **opportunities to upskill and retrain** in order to access growing work areas.
- Review how the Council can best support Croydon Worksⁱⁱⁱ and Croydon-based colleges to **provide a training offer and support people into jobs** in response to the current economic crisis, and in the medium term in support of the future green jobs strategy. Improve skills gaps information by including questions in business surveys to ensure the Council and colleges have information about emerging skills needs and gaps.
- **Remove barriers for businesses to support training** by creating an appropriate point of contact to speak to about skills needs and support.
- Engage with local businesses and unions to **cement a borough-wide commitment to the London Living Wage**.^{iv} Ensure this commitment is consistently embedded in the Council's procurement and investment policies building on work already undertaken by the Council in this area.
- **Work with local unions to ensure new green jobs are of good quality**, providing stable, long-term, well-paid, and rewarding work protected by proper union recognition.

ⁱⁱ Good quality jobs are defined as secure, stable employment that pays at least enough to provide a decent standard of living and has trade union recognition.

ⁱⁱⁱ Croydon Works is Croydon's Job and Training Hub providing a free recruitment service, working in partnership with Job Centre Plus, Croydon College, and Croydon Council <https://croydonworks.co.uk/>

^{iv} Real Living Wage rates are defined by the Living Wage Foundation. The London Living Wage (£10.85 currently) is a London-weighted version of the Living Wage Foundation's Real Living Wage (£9.60 currently across the UK except London) <https://www.livingwage.org.uk/what-real-living-wage>

Recommendation 9: Strengthen the local and foundational economy.^v

In particular:

- Ensure foundational and local businesses have **easy access to adequate post-pandemic support** and are **supported to green their businesses**.
- **Provide seed funding** to local green businesses that commit to be London Living Wage employers.
- Engage with local anchor institutions (Council, the NHS, and education institutions) to agree a **community wealth-building approach** to ensure, through their commitment to being a London Living Wage employer, and their use of investment and procurement spend, they support a green economic recovery.

Recommendation 10: Build on recent progress to continue to drive towards a circular economy.

In particular:

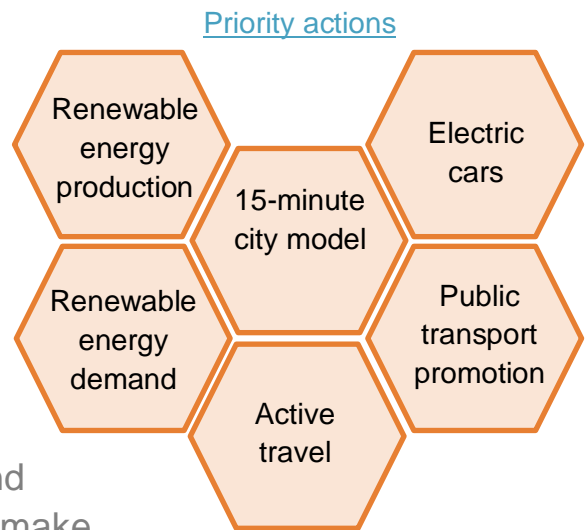
- **Open up local economic opportunities** from designing out waste and pollution, keeping products and materials in use, and regenerating natural systems.^{vi}

^v The foundational economy consists of basic services and products including care and health services, food, housing, and energy.

^{vi} Information and guides on the circular economy <https://www.ellenmacarthurfoundation.org/circular-economy/what-is-the-circular-economy>

GREENING OUR NEIGHBOURHOODS

To drive rapid carbon reduction in our neighbourhoods, the Council should reduce the need to travel, influence the type of travel adopted by residents and businesses, and improve energy efficiency in homes and public and commercial property to reduce their energy use across the borough. The Council can provide certainty for retrofitting businesses by creating a pipeline of work through social housing and increasing confidence for homeowners to make changes to their properties by identifying local trusted trades people.



Headline recommendation: Low-traffic neighbourhoods

Low-traffic neighbourhoods (LTNs) are zones of residential streets where through motor traffic is discouraged or reduced to promote active travel and cleaner air. The streets should be easily accessible, but not used by cars to pass through the area. As through traffic lessens, overall traffic levels, speeds, and emissions all are reduced. Neighbourhoods are resultantly safer, quieter, and see higher uses of public transport and active travel (ie walking and cycling). This is particularly beneficial for women and people with lower incomes who are more likely to rely on walking and public transport.

Examples internationally have garnered acclaim, particularly Barcelona’s Superblocks that has created LTNs for areas with 5,000 to 6,000 people. The Superblocks were designed from a gender perspective, using gender-disaggregated data to understand and respond to gender differences in urban mobility patterns. For example, women are more likely to make short-distance, frequent journeys throughout the day, whereas men are more likely to make fewer but farther journeys during peak hours.³⁴ The City of Barcelona is continuing to collect and analyse gender-disaggregated data to evaluate and expand the Superblocks. Croydon’s current use of School Streets is a form of LTN that operates with a time-limited filter. The implementation of LTNs would be complementary in creating more space for walking and cycling. The Commission recommends piloting an LTN in every ward across the borough.

Waltham Forest Council recently received funding from Transport for London (TfL) to create LTNs. After overcoming initial opposition and using a process to feed residents’ views into the design, a series of LTNs was created that uses one-way streets, wider pavements, and planters, among other modal filters. It has transformed Walthamstow Village into a liveable neighbourhood with an average traffic reduction of 56%.³⁵ The LTNs in Waltham Forest have also led to a significant increase in walking among residents and an overall reduction in street crime, particularly violent and sexual offences.³⁶

Before and after an LTN on Walthamstow Village's Orford Road³⁷



Croydon's new LTNs should be chosen in areas of low air quality, particularly given the stark inequalities in air pollution,³⁸ and build on any lessons learned from the successful School Streets initiative. Key to their success is that LTNs should be co-designed with local residents and local businesses in areas they identify as high priority in their ward (due to poor air quality, safety concerns, and congestion). Meaningful community engagement in this process is essential, given the backlash against LTNs thus far.

For this process of co-design, there are guiding principles for LTNs:

- People should be able to walk across an LTN in 15 minutes.
- LTNs should be clustered around transport and amenity hubs.
- LTNs should be bordered by main 'distributor' roads.³⁹

A whole suite of modal filters is available to be debated through co-design to produce the LTNs. These include bollards or planters, reclaiming portions of the street for greenery or seating, and cycle ways. Therefore, it is likely that each piloted LTN will be distinct and reflect the local context and the ambitions of residents and business owners.

It is important that LTNs are distributed equitably, given that they can particularly benefit people without access to private green space or with poor access to safe parks and public spaces for recreation and exercise. The LTNs introduced in London between March and September 2020 have been broadly equitable, with people in the most deprived quarter of areas nearly three times likelier to live in a new LTN than the least deprived quarter of areas.⁴⁰ However, although Black, Asian, and minority ethnic (BAME) people were slightly more likely than White people to live in a new LTN, there were variations by racial group: Black Londoners were likelier to live in a new LTN compared to White Londoners, but Asian Londoners were slightly less likely than White Londoners to live in a new LTN. Therefore, as more LTNs are implemented, the spatial equity of their distribution should be monitored.

Headline recommendation: 15-minute city

Building on the principles of the mixed-use, multi-modal, and sustainable neighbourhoods of New Urbanism, the 15-minute city advocates for an urban planning approach to create districts where critical urban necessities are all accessible in 15 minutes by foot or bike. The model is based on four main principles – proximity, diversity, density, and ubiquity – with each area containing six social functions – living, working, supplying, caring, learning, and enjoying. With this approach, residents will easily be able to access workplaces, eateries,

and green spaces from their homes. The Commission recommends adopting this model and integrating it into the *Croydon Local Plan*.⁴¹

The Mayor of Paris, Anne Hidalgo, has championed the model. Melbourne has developed a similar 20-minute neighbourhood concept, where all key amenities (eg schools or parks) are accessible in 20 minutes by active travel or public transport.

Croydon should seek to avoid monoculture, with the same iterations of the model repeated throughout the borough that could quickly degrade simultaneously. Rather, the 15-minute model should be used as a function to build a distinctive urban form for neighbourhoods across the borough, allowing local uniqueness and vibrancy to flourish. Using this model, there should be reductions in car use, greater local social cohesion and feelings of belonging, and increased local business activity. Neighbourhoods should also become greener and punctuated by routes for cycling. Croydon would become the home of cutting-edge urbanism.

Recommendations

The Commission recommends that the Council addresses the following priority actions:

Recommendation 11: Increase renewable energy production in the borough.

In particular:

- Conduct an **assessment of the potential renewable energy generation sites** across the borough and technology options. Build on the feasibility work already undertaken by the Council to identify viable solar energy generation sites, for example Thornton Heath Leisure Centre, Oasis Academy, and Croydon University Hospital.
- Conduct an **assessment of the range of delivery models** to achieve the renewable energy target, for example a Council-owned energy company supporting community renewable installations and power purchase agreements.
- Establish a **target to increase renewable energy generation by 10% every year** in Croydon.

Recommendation 12: Increase renewable energy demand.

In particular:

- Promote a **resident renewable switching campaign** targeting 'able-to-pay' residents. The Council to identify and assess mechanisms to provide affordable renewable energy to vulnerable residents and those living in fuel poverty.
- Publicise the renewable energy percentage of energy providers to inform residents/local businesses switching.
- **Switch to a renewable energy only supplier** across all Council-owned assets. The Council to assess the mechanism to achieve this, for example through power purchasing agreements.

Recommendation 13: Develop a pipeline of retrofit projects to decarbonise and improve the energy efficiency of commercial and residential buildings.

In particular:

- Conduct a **detailed housing stock retrofit needs analysis**. London Councils is currently conducting a retrofit needs analysis for London that is expected to produce a baseline of the carbon footprint and energy bills, an understanding of the architecture and measures installed to date, and retrofit scenarios and pathways to net zero. The Council should engage with London Councils to access this data.
- Accelerate efforts to **decarbonise social housing**, providing a pipeline of work for locally based businesses.
- Engage with local businesses on **commercial building retrofit** and explore tax-based incentives.
- Engage with residents' associations and owners of apartment buildings on **communal retrofits**.
- **Develop area-based retrofit schemes**, including neighbourhood retrofits, community heat networks, flat block retrofits, and a tailored offer to sheltered housing facilities.
- Establish with Council partners a **pipeline of retrofit work** for public buildings and social housing in Croydon.

Recommendation 14: Develop local retrofit delivery capacity to strengthen the local economy.

In particular:

- Create a **one-stop shop for private retrofit** advice, trusted traders, and accessing government grants.
- Create a **retrofit academy** in association with Croydon colleges that can provide good quality education leading to good quality jobs in retrofitting for residents in the borough.
- Provide **training and upskilling of current construction sector** workers.
- Use **public procurement social value commitments**, alongside closer working with local providers to promote retrofit activity.

Recommendation 15: Adopt the 15-minute city model and embed it into the *Croydon Local Plan* to localise the borough.

In particular:

- Develop **new spatial planning models** to attract businesses and facilities to localised community hubs with carefully planned active and public transport connections.

Recommendation 16: Promote public transport and active travel to become the natural first choice.

- **Improve and extend cycle routes** to connect all of Croydon and define lanes with green infrastructure (hedges and planters) to improve safety and green the environment. Increase access to cycle storage across the borough.

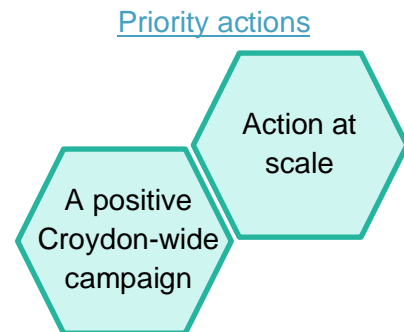
- Develop and pilot approaches to **low-traffic neighbourhoods (LTNs)** to reducing traffic in every ward. It is essential that lessons are learned from recent experience of imposing LTNs on communities. These pilots should be co-designed with residents and local businesses, and particularly target areas with poor air quality.
- Introduce **park-and-ride schemes** to reduce the number of vehicles entering central Croydon.
- Extend the **School Streets programme** to all schools in the borough with no parking near schools to reduce traffic and improve air quality. Support implementation with a campaign to encourage parents not to drive to schools.
- **Reduce the number of parking spaces** across the borough targeting areas of low air quality first.
- Use data from the Covid-19 pandemic **school bus provision** to assess if school buses should run all the time.
- Indicators of success to include a **reduction in car ownership for Croydon** as a whole, and air quality at key intervention areas.

Recommendation 17: Provide the infrastructure to enable the use of electric cars.

- Ensure the current commitment of 400 public charging points by 2022 is delivered and extended to improve access to rapid public charging points. Subsidise **electric vehicle charging and parking** to increase uptake.
- Increase access to **electric hire car hubs**.

GETTING PEOPLE AND BUSINESSES INVOLVED

To realise its ambitions, the Council will need buy-in and engagement from Croydon residents, employees, and businesses. This will require both awareness-raising activities across the borough about the actions residents, employees, businesses, trade unions, and other local organisations can take, and engagement activities to inspire people to take action.



Headline recommendation: High-profile school campaign

Schools provide a useful locus to tackle the climate crisis. First, schools offer opportunities to deliver effective educational campaigns and instil environment-positive behaviours in both school syllabuses and extra-curricular activities. Environmentalist theory and practice can be taught in schools. Second, as large assets with a significant footprint, schools can lead by example in pursuing emission-reduction measures, like generating renewable energy. The Commission recommends that the Council develops a high-profile campaign to reduce the emissions of all schools by 2025, including providing advice and support for all schools to become eco-schools. This campaign should directly engage children, parents, and school staff, while indirectly impacting wider community stakeholders.^{vii}

Eco-schools should be the pinnacle of this campaign. Eco-schools are pupil-led programmes that have had success worldwide. Schools register to be an eco-school and then involve a co-governance process with school staff and pupils working side by side to review the school's environmental performance, create an action plan, and link the school's environmental activity to the curriculum. Each eco-school approach is tailored to the school's context and ambitions and driven by the users, resulting in positive behaviour change and the fostering of linkages with environmental organisations.⁴²

Alongside these education-based changes, the Council's campaign should engage with senior school staff to discuss and help schools to implement operational changes that will reduce emissions. For instance, the Council could advocate for switching to renewable energy providers or installing solar panels on school buildings. The Commission recommends that the Council develops a suite of possible solutions for schools that can be delivered bespoke according to the needs and environment of each school.

^{vii} Examples of initiatives include Ashden's campaign to support all schools reach zero carbon <https://letsgozero.org/> and their Low Energy Sustainable Schools programme <http://www.lessco2.org.uk/>

Recommendations

To engage local stakeholders and communities to tackle the climate crisis, the Commission recommends that the Council addresses the following priority actions:

Recommendation 18: Develop a positive Croydon-wide campaign.

In particular:

- Frame the climate change emergence as **a challenge ‘Croydon is taking on’**. The Council should highlight how multiple partners from businesses and trade unions across different sectors, community groups, and the Council are taking positive action.
- **Promote existing national campaigns** targeting increasing awareness of actions residents can take, and scale local campaigns and existing action by sharing best practice across the borough.
- **Support local innovation** through the provision of small seed-funding grants to locally based organisations and residents to deliver creative local campaigns to promote action.

Recommendation 19: Promote action at scale.

In particular:

- Develop a **high-profile campaign to reduce the emissions of all schools** by 2025. Provide advice and support for all schools to become eco-schools.
- **Increase the profile of local businesses** taking action to reduce carbon emissions through the establishment of Croydon Green Business Awards.
- **Pilot social value leases** on Council-owned assets to incentivise the creation of social, local economic and environmental outcomes through a reduction in rent.
- **Strengthen community-based organisations** to enable them to support and scale action within their communities. The Council to provide a flexible range of support for community-led action, led by the interests of local groups, including support to access small-scale funding.
- **Inspire action by showcasing examples** of actions that have worked elsewhere.

ACHIEVING THE SCALE OF CHANGE

Croydon Council is directly responsible for between 2% and 5% of the local area's production-based carbon emissions. The Council can additionally leverage action on climate change through its services, planning, enforcement roles, housing, regeneration, economic development activities, education and skills services, and investments.⁴³ However, these levers are not sufficient to deliver the ambition of climate change adaptation and net-zero carbon emissions. It is estimated that more than half of the emissions cuts needed rely on people and businesses taking up low-carbon solutions. To deliver the net-zero ambition will require local-level action to be supported by regional and national government action.

Recommendations

The Commission recommends the Council lobbies the Greater London Authority (GLA) and central government on four immediate areas for action:

Recommendation 20: Provide appropriate long-term funding to support delivering of climate adaptation and net-zero actions.

The Council should lobby national government for long-term devolved funding to support climate adaptation and net-zero actions. This financing should assist with the implementation and delivering of emission-reducing and renewable-energy-producing activities.

Recommendation 21: Extend the ultra-low emissions zone.

The Council should campaign for an extension of the ultra-low emissions zone (ULEZ) to the M25 to improve air quality in the capital as well as seek to reduce the use of emission-producing vehicles.

Recommendation 22: Provide affordable public transport

The Council should lobby the GLA and Transport for London (TfL) for more affordable public transport provision to increase Croydon's public transport capacity. Different forms of public transport should be lobbied for to increase the options available to Croydon's residents. The Commission recommends that the Council works closely with neighbouring boroughs to ensure joined-up public transport provision.

Recommendation 23: Adopt distance-based road pricing

The Council should engage with the GLA and TfL to advocate for replacing the current area-based congestion charge with distance-based road pricing and extend this scheme across all of London to support the reduction of private vehicle use.

A distance-based charge that could vary according to time-based congestion and pollution levels has the potential to reduce traffic by 10%–15% and total emissions and pollutants by 15%–20%.⁴⁴ A distance-based charge is progressive, reflects the length of individual

journeys, and represents the 'user pays' and 'polluter pays' principles. Additionally, public transport use and active travel behaviours should be improved.

Appendix 1: Recommendations

Getting the Groundwork Right									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
1. Rebuild trust	Commit to deep ongoing engagement with residents, community groups, workers, trade unions, and businesses to ensure initiatives aimed at reducing emissions and improving quality of life in the borough are co-created.	X		Ongoing		Enabling activity		Co-creation process encourages behaviour change for a diverse group across the borough.	Low
	Host annual community events to review progress and enable the community to hold the Council and other partners to account.	X		Ongoing		Enabling activity		Improves accountability.	Low
	Formalise a climate panel, with representatives from across the local area including a diverse group of residents, businesses, trade unions, and civil society organisations that can hold the Council to account, with a yearly review of progress, and a three-year review or a recommendations public hearing at which Council leaders report on progress on delivering a green transition in the borough.	X	X	1 year / ongoing		Enabling activity		Improves accountability.	Low

Getting the Groundwork Right									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
2. Develop an alliance of partners	Commit to establishing a one-Croydon approach to ensuring a green economic recovery by building a broad alliance of partners (including unions, businesses, civil society organisations, further education and skills providers, and other anchor organisations).	X	X	2–3 years		Medium	Strengthens economy and builds economic collaboration.	Improved awareness about green economic ways of working.	Low
	Create a collective plan of action and establish ways of working together to deliver the plan.	X	X	3–5 years		Medium	Strengthens economy and builds economic collaboration.		Low
	Support partners to disclose their carbon emissions , benchmark their progress, and share best practice.	X	X	3–5 years		Enabling activity		Sharing of best practice hones green economic ways of working.	Low
3. Get the Council's own house in order	Ensure the Council's pension investment strategies are in line with its declaration of a climate emergency.	X		1 year		Medium			Low
	Establish a clear strategy and timeframe for divesting the Council's pension scheme of fossil fuels and other high-carbon investments.	X		1 year		Medium			Low
	Transparently report on the progress of this divestment publicly.	X		Ongoing		Enabling activity			Low

Getting the Groundwork Right									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
	Appoint a Councillor with responsibility for overseeing implementation of the recommendations.	X		1 year		Enabling activity		Champions behaviour change in the Cabinet.	Low
	Create a senior-level resilience officer with cross-Council responsibility for implementing actions and ensuring all Council activity works to support climate change adaptation and the net-zero target.	X		1 year		Enabling activity		Champions behaviour change in the Council.	Low
4. Tackle adaptation risks	Develop climate adaptation pathways for Croydon outlining current and future climate risks , including a climate change risk assessment to understand current level of risk and vulnerabilities (eg including considering overseas risks), and drive action and communication.	X		1 year	All (flooding, overheating, water stress)	n/a			Low
	Conduct a thorough assessment of the current landscape for climate adaptation in Croydon. This should clearly state how risks will evolve in future and distinguish actions within the Council's direct control to influence, and actions that require the Council to lobby for national support.	X		1 year	All (flooding, overheating, water stress)	n/a			Low (actions may have costs)

Getting the Groundwork Right									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
5. Establish measures to understand progress	Establish a clear and understandable baseline for production- and consumption-based carbon emissions in the borough and prepare a roadmap of required reductions to meet the net-zero target by 2030.	X		1 year		Enabling activity		Provides roadmap indicating necessary behaviour change.	Low
	Create a set of simple, understandable measures of success and accountability indicators to chart progress in tackling the climate emergency in Croydon through climate change adaptation and mitigation actions. The baseline should be made publicly available, and results regularly published in the interests of transparency. The measures of success should include a set of social indicators that can monitor both the community grounding and the social justice impacts of the transition to net zero.	X		Ongoing	All (flooding, overheating, water stress)	Enabling activity	Ties progress with social justice, reducing local inequalities.	Added accountability and transparency enable an awareness of progress and risks, catalysing implementation of actions.	Low

Getting the Groundwork Right									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
6. Embed carbon reduction and climate adaptation in the activities and strategies of the Council and its key partners	Conduct a thorough review of all current Council policies and strategies to ensure climate adaptation action is embedded. Identify policies and strategies that are being updated in the short term as opportunities to embed adaptation action. Develop a plan of action with a clear timeline to embed adaptation action across all relevant policies and strategies.	X		1–2 years	All (flooding, overheating, water stress)	Low			Low
	Conduct a thorough review of all current Council activity to ensure it is working to support the carbon-reduction targets. Identify quick wins and longer-term changes in Council activity that can reduce the carbon footprint of the borough.	X		1–2 years		Medium			Low
	Conduct a thorough review of existing Council strategies and plans to ensure they support the carbon-reduction roadmap, identifying co-benefits and revising those that are not aligned. This includes strengthening planning regulations to cut emissions from new developments and address adaptation risks, including on small-scale builds.	X		1–2 years	All (flooding, overheating, water stress)	Low			Low

Getting the Groundwork Right									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
	Conduct a thorough review of processes guiding the Council's engagement with external partners , including procurement processes, to ensure the Council is encouraging and embedding measures of success consistent with the transition to net zero into partner and supplier agreements.	X		1 year		Medium		Encourages partners and suppliers to assist in transition to net zero.	Low
7. Contribute to a broader knowledge exchange	Ensure ongoing engagement with other councils/GLA to learn from their experience, share best practice, and assess opportunities for collaboration.	X	X	2–3 years	All (flooding, overheating, water stress)	Enabling activity	May present opportunities for green investment.	Encourages cooperation to tackle the climate crisis.	Low

Driving a Green Economic Recovery									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
8. Promote green jobs and skills	Develop a medium-term plan to identify the pipeline of future good quality green jobs in the borough, and to identify and prioritise the skills needed to open up these opportunities to local people.	X		1–4 years		Low	Creates new green jobs and green economic growth. Tackles local skills gaps		Low
	Ensure workers who have been impacted by the Covid-19 pandemic, particularly those facing job loss, and sectors impacted by the need to decarbonise (eg aviation) are offered opportunities to upskill and retrain in order to access to growing work areas.	X		1–3 years		Enabling activity	Helps sectors decarbonise efficiently. Tackles local skills gaps. Provides skilled employees to growing green sectors.		Medium
	Review how the Council can best support Croydon Works ^{viii} and Croydon-based Colleges to provide a training offer and support people into jobs in response to the current economic crisis, and in the medium term in support of the future green jobs strategy. Improve skills gaps information by including questions in business surveys to ensure the Council and colleges have information about emerging skills needs and gaps.	X		Ongoing		Enabling activity	Tackles the Covid-19 related economic crisis Tackles local skills gaps.		Medium

^{viii} Croydon Works is Croydon’s Job and Training Hub providing a free recruitment service, working in partnership with Job Centre Plus, Croydon College and Croydon Council <https://croydonworks.co.uk/>

Driving a Green Economic Recovery										
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council	
	Remove barriers for businesses to support training by creating an appropriate point of contact to speak to about skills needs and support.	X		Ongoing		Enabling activity	Tackles local skills gaps.		Low	
	Work with businesses and local unions to establish a borough-wide commitment to the London Living Wage. ^{ix} Ensure this commitment is consistently embedded in the Council's procurement policies building on work already undertaken by the Council in this area.		X	1–2 years		Enabling activity	Reduces local deprivation and inequalities. Improves local worker conditions.		Low	
	Work with local unions to ensure new green jobs are good quality , providing stable, long-term, well-paid, rewarding work protected by proper union recognition.	X		Ongoing		Enabling activity	Reduces local deprivation and inequalities. Improving local worker conditions.		Low	
9.Strengthen the local and foundational economy	Ensure foundational and local businesses have easy access to adequate post-pandemic support and are supported to green their businesses.	X		1-3 years		Enabling activity	Tackles the Covid-19-related economic crisis. Grows green business activities.		Low	

^{ix} Real Living Wage rates are defined by the Living Wage Foundation. The London Living Wage (£10.85 currently) is a London weighted version of the Living Wage Foundation's Real Living Wage (£9.60 currently across the UK except London) <https://www.livingwage.org.uk/what-real-living-wage>

Driving a Green Economic Recovery									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
	Provide seed funding to local green businesses that commit to be London Living Wage employers.	X		Ongoing		Low	Reduces local deprivation and inequalities. Improves local worker conditions. Grows green business activities.		Low-Medium
	Engage with local anchor institutions (Council, NHS, and education institutions) to agree a community wealth-building approach^x to ensure, through their commitment to be a London Living Wage employer, and their use of investment and procurement spend, they support a green economic recovery.		X	1-3 years		Low	Reduces local deprivation and inequalities. Grows green business activities.	Support for green investment and procurement strategies.	Low
10. Strengthen the circular economy	Building on recent progress the Council should continue to drive towards a circular economy and open up local economic opportunities from designing out waste and pollution, keeping products and materials in use, and regenerating natural systems. ^{xi}	X		Ongoing		Medium	Creates new green industries/businesses.	Support for recycling and reusing.	Low

^x The five principles of community wealth building are defined as follows: plural ownership of the economy; making financial power work for local places; fair employment and just labour markets; progressive procurement of goods and services; and socially productive use of land and property <https://cles.org.uk/what-is-community-wealth-building/the-principles-of-community-wealth-building/>

^{xi} Information and guides on the circular economy <https://www.ellenmacarthurfoundation.org/circular-economy/what-is-the-circular-economy>

Greening our Neighbourhoods									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
11. Increase renewable energy production	Conduct an assessment of the potential renewable energy generation sites across the borough and technology options. Building on the feasibility work already undertaken by the Council to identify viable solar energy generation sites, for example Thornton Heath Leisure Centre, Oasis Academy, and Croydon University Hospital.	X		1–3 years		Low			Low
	Conduct an assessment of the range of delivery models to achieve the renewable energy target, for example a Council-owned energy company, supporting community renewable installations and power purchase agreements.	X		1–3 years		Low			Low
	Establish a target to increase renewable energy generation by 10% every year in Croydon.	X	X	Ongoing to 2030		High	Invests in Croydon's renewable sector. Skills training and job creation.		Low (cost if Council-owned installation)
12. Increase renewable energy demand	Promote a resident renewable switching campaign.	X		Immediate		Enabling activity		Domestic use of renewable energy.	Low
	Publicise the renewable energy percentage of energy providers to inform residents/local businesses switching.	X		Immediate		Enabling activity		Domestic use of renewable energy.	Low

Greening our Neighbourhoods									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
	Council to switch to a renewable energy only supplier across all Council-owned assets.	X		Immediate-1 year (TBC if purchasing power agreements in place)		Medium			Minimal
13. Develop a pipeline of retrofit projects	Conduct a detailed housing stock retrofit needs analysis.	X		1 year		Enabling activity			Low
	Accelerate efforts to decarbonise social housing , providing a pipeline of work for locally based businesses.	X		10 years			Invests in Croydon's green businesses. Reduces fuel poverty.		Significant upfront capital costs but these can be shared with housing associations and built into existing maintenance budgets.
	Engage with local businesses on commercial building retrofit and explore tax-based incentives.	X		1 year		High	Invests in Croydon's green businesses.		Low
	Engage with residents' associations and owners of apartment buildings on communal retrofits.	X	X	1 year		High	Invests in Croydon's green businesses.		Low
	Develop area-based retrofit schemes , including neighbourhood retrofits, community heat networks, flat block retrofits, and a tailored offer to sheltered housing facilities.	X		1–5 years		Medium			Medium

Greening our Neighbourhoods									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
	Establish with Council partners a pipeline of retrofit work for public buildings and social housing in Croydon.	X	X	1–5 years		Medium	Reduces fuel poverty for social housing residents.		Medium
14. Develop local retrofit delivery capacity	Create a one-stop shop for private retrofit advice, trusted traders, and accessing government grants.	X	X	1–2 years		Enabling activity		Improved awareness of retrofitting possibilities.	Set-up and running costs likely modest, might be supported by grants/external finance.
	Create of a retrofit academy in association with Croydon colleges that can provide good quality education leading to good quality jobs in retrofit for residents in the borough.	X	X	1–3 years		Enabling activity	Training and skilling. Skilled workers for growing green sector.		Funding sought from external stakeholders.
	Provide training and upskilling of current construction sector workers.	X	X	1 year		Enabling activity	Training and skilling. Skilled workers for growing green sector.		High government support needed.
	Use public procurement social value commitments , alongside closer working with local providers to promote retrofit activity.	X		Immediate		Enabling activity		Improved awareness of retrofitting.	Low

Greening our Neighbourhoods									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
16. Promote public transport and active travel to become the natural first choice	15. Adopt the 15-minute city model and embed it into the Croydon Local Plan to localise Croydon	X	X	Ongoing to 2030	All (flooding, overheating, water stress)	High	Strengthens local business hubs.	Increased social cohesion. Reduced travel.	Low
	16. Improve and extend cycle routes to connect all of Croydon and define lanes with green infrastructure (hedges and planters). Increase access to cycle storage across the borough.	X	X	Ongoing to 2030		Medium		Increased active travel.	Medium
	Develop and pilot approaches to reducing traffic in every ward. It is essential that lessons are learned from recent experience of imposing LTNs on communities. These pilots should be co-designed with residents and local businesses, and particularly target areas with poor air quality.	X		1–3 years		Medium	Increases local business activity.	Increased active travel and use of public transport.	Medium
	Introduce park-and-ride schemes to reduce the number of vehicles entering central Croydon.	X	X	2–3 years		Low–medium		Encourage use of public transport.	Low–medium

Greening our Neighbourhoods									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
	Extend the School Streets programme to all schools in the borough with no parking near schools to reduce traffic and improve air quality. Support implementation with a campaign to encourage parents not to drive to schools.	X		1–2 years		Medium		Increased active travel and use of public transport.	Low
	Reduce the number of parking spaces across the borough targeting areas of low air quality first.	X		Ongoing to 2030		Low-medium		Increased active travel and use of public transport.	Low
	Use data from the Covid-19 school bus provision to assess if school buses should run all the time.		X	2–3 years		Low			Cost borne by TfL
	Indicators of success to include a reduction in car ownership for Croydon as a whole and air quality at key intervention areas.	X		Immediate		Low			Low
17. Provide the infrastructure to enable the use of electric cars	Ensure the current commitment of 400 public charging points by 2022 is delivered and extended to improved access to rapid public charging points. Subsidise electric vehicle charging and parking to increase uptake	X	X	Ongoing to 2022		Low		Increased uptake of electric cars.	Cost previously committed
	Increase access to electric hire car hubs	X	X	Ongoing to 2030		Low-medium		Increased uptake of electric cars.	Low

Getting People and Businesses Involved									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
18. Develop a positive Croydon-wide campaign	Frame the climate change emergence as a challenge 'Croydon is taking on' , and multiple partners from businesses and trade unions across different sectors, community groups, and the Council are taking action.	X		Ongoing	All (flooding, overheating, water stress)	Low		Improved positive attitude towards climate crisis.	Low
	Promote existing national campaigns targeting increasing awareness of action residents can take, and scale local campaigns and existing action by sharing practice across the borough.	X		Ongoing		Low		Increased awareness of possible actions.	Low
	Support local innovation through the provision of small seed-funding grants to locally based organisations/residents to deliver creative local campaigns to promote action.	X		Ongoing	All (flooding, overheating, water stress)	Low	Funds local projects that could have local economic outcomes.	Local projects will likely result in positive behaviour outcomes.	Medium
19. Promote action at scale	Develop a high-profile campaign to reduce the emissions of all schools by 2025. Provide advice and support for all schools to become eco-schools.	X	X	1-3 years		Medium		Environmentalism becomes a critical part of Croydon's schools' syllabuses.	Low
	Increase the profile of local businesses taking action to reduce carbon emissions through the establishment of Croydon Green Business Awards.	X		Ongoing		Low	Increases green business activities.		Low

Getting People and Businesses Involved									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
	Pilot social value leases on Council-owned assets to incentivise the creation of social, local economic and environmental outcomes through a reduction in rent.	X		1-4 years		Low	Reduced rents may lead to larger investments in business.		Medium
	Strengthen community-based organisations to enable them to support and scale action within their communities. Council to provide a flexible range of support for community-led action, led by interests of local groups, including support to access small-scale funding.	X		1-4 years	All (flooding, overheating, water stress)	Low		Community-led sustainability initiatives.	Low-medium
	Inspire action by showcasing examples of actions that have worked elsewhere.	X		Ongoing		Low		Encourage behaviour changes by showcasing possible ways of working.	Low

Achieving the Scale of Change									
Theme	Recommendation	Croydon Council Direct Control	Lobby Other Body	Timescales	Adaptation Risk(s) Addressed	CO ₂ Savings (Rating)	Local Economic Impact	Supporting Behaviour Change	Cost to Council
Lobbying the GLA, TfL, and national government	20. Provide appropriate long-term funding to support delivery of climate adaptation and net-zero Actions.		X	Ongoing	All (flooding, overheating, water stress)	Enabling	Greater investment in climate crisis projects and actions.		Low
	21 Extend the ultra-low emissions zone to the M25 to support the reduction of private vehicle use.		X	1–5 years		Medium		Reduced private motor car usage. Greater use of public transport and increased active travel.	Low
	22. Provide affordable public transport – lobby the GLA and TfL		X	Ongoing		Medium		Greater use of public transport.	Low
	23. Use distance-based road-pricing. GLA/TfL to introduce ‘road pricing’ instead of congestion charge and extend it across all of London to support the reduction of private vehicle use.		X	1–5 years		High		Reduced private motor car usage. Greater use of public transport and increased active travel.	Low

Appendix 2: The Croydon Climate Crisis Commission terms of reference

Background

In June 2019, Croydon Council declared a climate and ecological emergency and undertook to implement a process for acting on this declaration by commissioning a climate Citizens' Assembly and developing a Climate Crisis Commission. The Council founded an independent Commission to work in collaboration with the Council and the wider community, involve expert advice, and engage and co-produce with the people of Croydon, to drive forward radical action to decarbonise the local economy^{xii} in a just and fair way.

Croydon Council partnered with the [New Economics Foundation](#) to set up the Croydon Climate Crisis Commission.

The Commission was launched on 12 March 2020, shortly before the country entered lockdown in response to the Covid-19 pandemic.

Purpose

The primary purpose of the Croydon Climate Crisis Commission is to drive rapid reductions in the carbon emissions from activities in the borough of Croydon, targeting carbon neutrality by 2030. Critically, the Commission aims to ensure the transition to zero carbon happens in a fair and just way, providing good quality jobs, improving wellbeing, and reducing inequality. This will be considered in the context of building back an economy that achieves these aims, following the lockdown in response to the Covid-19 pandemic.

The Commission's short-term purpose is to produce an action plan, developed with the people of Croydon, to show how the borough of Croydon can become carbon neutral by 2030. This action plan will be delivered to the Council, who will also be considering how to respond to the economic challenges caused by the Covid-19 pandemic. To produce the action plan, the Commission will receive recommendations from a number of themed working groups and will be supported by the Council to run a public engagement process.

In the longer term there is the opportunity for the Commission to transition into an independent body that could support and hold the Council to account for the delivery of the action plan.

Scope

The Croydon Climate Crisis Commission will be an independent body governed by a board of appointed commissioners and members.

The Commission will play a key role in engaging the wider Croydon community and businesses large and small in the transition to net zero and is expected to forge alliances with a diverse range of groups and stakeholders.

^{xii} 'Local economy' relates to the 'lived experience of the local economy'. This is the way in which the local economy functions to shape the lived experience of people within an area. The economy is understood holistically as the system by which resources are generated and transferred between people, as a means to generate wellbeing within environmental limits.

As an independent entity, the Commission is not limited in the breadth of its considerations but will be guided by evidence and expertise on how to achieve the carbon neutrality target. The Commission will build on the work of the Croydon Citizens' Assembly, which concluded in March 2020.

The Commission will be provided with a baseline assessment of the borough's carbon emissions, commissioned by the Council. This will be used to prioritise activity and monitor and report progress.

Key functions of the commission include the following:

- Build on the momentum created by the school climate strikes, Extinction Rebellion, and many other climate campaigners and groups.
- Carry forward the work of Croydon's Citizens' Assembly on climate and develop an action plan for Croydon to become carbon neutral by 2030.
- Bring experts from the community, business, science and politics together to design and fund new carbon neutral projects.
- Keep Croydon on track to hit its 2030 carbon neutral target and engage with anchor institutions in Croydon and the surrounding area to ensure this is achieved.
- Partner with other Commissions and groups around the country to lobby for the changes needed from national and regional government to allow us to achieve our ambitions.

The independent Commission is an evolving organisation that will develop over the next few months. Throughout this time there will be many opportunities for Croydon residents to get involved, within social distancing rules and restrictions.

Membership

The Chair of the Commission, appointed by the Council, is Miatta Fahnbulleh, CEO of the New Economics Foundation.

The Commission's membership brings together representatives from across the Croydon community. Membership of the Commission is drawn from the following groups:

- Local anchor institutions
- Croydon community representatives
- Technical specialists

Outputs

The initial output of the Commission will be a set of recommendations in the form of an action plan delivered to Croydon Council that sets out steps to be taken to transition the borough to its carbon-neutral target by 2030 in a just way as part of its recovery from the pandemic. These will consider the immediate term of the recovery from the Covid-19 pandemic. While delivered to the Council, the Commission consider recommendations for anchor institutions, the Great London Authority (GLA), and national government. The recommendations will be developed as the country is in the initial response and recovery

phases of the Covid-19 pandemic and a review point will be built in so they can be adjusted as necessary as the context changes.

Process and timescales

The intention is that the work of the Commission as set out in these terms of reference will proceed over a nine-month period in three phases (N.B. Progress is likely to be impacted by the response to the Covid-19 pandemic, and timings will be revised accordingly):

1. Working groups are established and develop technical action plans that the Commission will synthesise and prioritise.
2. A period of Council-led engagement on a draft action plan and events (subject to government advice on social distancing and events). It is noted that the Commission will not be able to do as much engagement in advance of agreeing its initial recommendations as previously hoped before the Covid-19 pandemic.
3. The Commission considers the responses to engagement and presents a recommended action plan to the Council.

Longer term

Following delivery of a recommended action plan to the Council, the Commission will consider a transition from its current scope to one of an independent body that can hold the Council to account for delivery. As this stage, the current Commission will develop recommended terms of reference for the next stage.

Independent of the structure of the Commission, the recommendations will include a review point at 12 months. This will be an opportunity to reflect on the recommendations and make adjustments to reflect a different economic position, progress made, and any changes to national and local policy since the recommendations were agreed. This also reflects that the initial recommendations will be prepared while the country is in the initial response and recovery phase from the Covid-19 pandemic.

Working groups

The Commission will be advised by working groups that will take an in-depth look at specific areas. The working groups will be made up of 12–15 people with expertise and experience of the areas being considered. Each working group will be chaired by a member of the Commission. The scope of the groups will be to consider the actions in their area and produce a report to the Commission on their recommended actions. The working groups will review available evidence and hear from subject matter experts as they produce their reports.

The structure and Chairs of the working groups was agreed at the first meeting of the Commission as follow:

- Adaptation and resilience (Candice Howarth)
- Jobs, skills, and employment (Jonathan Sharrock)
- Housing, planning, and built environment (Russell Smith)
- Transport and energy (Major infrastructure) (Peter Underwood)

- Awareness, engagement, and communications (Cllr Nina Degrad, Nkemdilim Onyiah)

The working groups will draw on the recommendations of the Croydon Citizens' Assembly and will develop technical action plans that the Commission will synthesise and prioritise. There are important cross-cutting issues that will need to be considered across the groups. The groups will work closely together supported by the Commission.

Scope

Each working group will play a key role in supporting the Commission in engaging the wider Croydon community in the transition to net zero and is expected to forge alliances with a diverse range of groups and stakeholders.

The scope of the groups will be determined by the Chair. Each group will consider the actions in their area and produce a report to the Commission on their recommended actions. The working groups should consider their recommendations against the aims of the Commission to drive forward action to decarbonise the local economy in a just and fair way. They will review available evidence and hear from subject matter experts as they produce their reports. The working groups will build on the work of the Croydon Citizens' Assembly, which concluded in March 2020. There are important cross-cutting issues that will need to be considered across the groups. The groups will work closely together supported by the Commission.

Outputs

Each working group will produce a series of recommendations for the Commission to consider ahead of public engagement. The recommendations should include some short-, medium-, and long-term actions for the Council and other stakeholders.

Appendix 3: Members of the Commission’s Working Groups

Housing, planning and the built environment

Name	Role/Organisation	Role (if applicable)
Russell Smith	Commissioner	Chair
Natasha Brown	Croydon Citizens’ Assembly	
Michael Boateng	Croydon Citizens’ Assembly	
Steve Dennington (Shared Role)	Head of Spatial Planning, Croydon Council	
Jean Gooding	Croydon Citizens’ Assembly	
Nik Nelberg	Earl and Calam Design and Build Ltd	
Ben Taylor	Croydon Living Streets	
Nicola Townsend (Shared Role)	Head of Development Management, Croydon Council	
Lucy Webb	Head of Regeneration, Croydon Council	
Alex Chapman	New Economics Foundation	Co-ordinator

Transport and energy

Name	Role/Organisation	Role (if applicable)
Peter Underwood	Commissioner	Chair
Titilope Adeove	Engineer and SELCE volunteer	
Rakesh Amin	Croydon Citizens’ Assembly	
Austen Cooper	Croydon Cyclists	
Toby Costin	CREW Energy	
Bob Fiddik	Team Leader – Sustainable Development & Energy, Croydon Council	
Amy Foster	Croydon Living Streets	
Jay Ginn	Visiting Professor at KCL Institute of Gerontology	
Angus Hewlett	Croydon Living Streets	
Ava Osbiston	Healthy Streets Officer for Croydon, Sustrans	
Ian Plowright	Head of Transport, Croydon Council	
Peter McDonald		
Tiffany Lam	New Economics Foundation	
Chaitanya Kumar	New Economics Foundation	Co-ordinator

Awareness, engagement, and communications

Name	Role/Organisation	Role (if applicable)
Nkemdilim Onyiah	Commissioner	Chair
Councillor Nina Degrad	Croydon Council	Chair
Joe Duggan	Co-Chair Crystal Palace Transition Town	
Angus Hewlett	Croydon Living Streets	
Faiza Mahmood	Croydon Citizens' Assembly	
Leonie Osborne	Chair, Croydon Friends of the Earth	
Silvia Sánchez	Commissioner	
Ester Sutton	Commissioner	
Ben Taylor	Croydon Living Streets	
Yasmin Ahmed	Croydon Council	
Margaret Welsh	New Economics Foundation	
Elizabeth Cox	New Economics Foundation	Co-ordinator

Jobs, skills, and employment

Name	Role/Organisation	Role (if applicable)
Johnathan Sharrock	Coast to Capital	Chair
Dr Martin Graham	Croydon TUC	
Ann-Christine Harland	Croydon College	
Safina Jamal	Croydon Citizens Assembly	
Yvonne Okiyo	Equalities Manager, Croydon Council	
Arun Sahdev	Croydon Citizens' Assembly	
Matt Sims	Croydon BID	
Carol Squires (Shared Role)	Economic Development Manager	
Stephen Tate (Shared Role)	Director – Growth Employment and Regeneration	
Colette Beaupre	New Economics Foundation	Co-ordinator

Adaptation and resilience

Name	Role/Organisation	Role (if applicable)
Candice Howarth	LSE Place-based Climate Action Network	Chair
Yasmin Ahmed	Croydon Council	
Kristen Guida	London Climate Change Partnership	
Lewis Knight	Bioregional	
Grace Onions	Croydon Friends of the Earth	

Name	Role/Organisation	Role (if applicable)
Maria Smith	Buro Happold	
Jeff Sweeney	Croydon Citizens' Assembly	
Norman Vaciannia,	Croydon Council	
Elizabeth Cox	New Economics Foundation	Co-ordinator

Endnotes

- ¹ Gouldson, A., Sudmant, A., & Duncan, A. (2019). *A summary carbon roadmap for Croydon*. Place-based Climate Action Network. Retrieved from <https://pcancities.org.uk/>
- ² IPCC. (2018). *Special report on global warming of 1.5°C. Summary for policymakers*. Intergovernmental Panel on Climate Change. Retrieved from https://www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15_SPM_version_report_LR.pdf
- ³ Carbon Trust. (n.d.). Briefing: What are Scope 3 emissions? [webpage]. Retrieved from <https://www.carbontrust.com/resources/briefing-what-are-scope-3-emissions> [accessed March 2021].
- ⁴ Gouldson, A., Sudmant, A., & Duncan, A. (2019). *A summary carbon roadmap for Croydon*. Place-based Climate Action Network. Retrieved from <https://pcancities.org.uk/>
- ⁵ GLA. (n.d.). London Energy and Greenhouse Gas Inventory 2018 [webpage]. Great London Authority. Retrieved from <https://data.london.gov.uk/dataset/leggi> [accessed March 2021].
- ⁶ Ibid.
- ⁷ Gouldson, A., Sudmant, A., & Duncan, A. (2019). *A summary carbon roadmap for Croydon*. Place-based Climate Action Network. Retrieved from <https://pcancities.org.uk/>
- ⁸ Ibid.
- ⁹ Ibid.
- ¹⁰ Mayor of London. (n.d.). The London Environment Strategy (2018) [webpage]. Retrieved from <https://www.london.gov.uk/what-we-do/environment/london-environment-strategy> [accessed March 2021].
- ¹¹ Mayor of London (n.d.) London City Resilience Strategy (2020) Retrieved from https://www.london.gov.uk/sites/default/files/london_city_resilience_strategy_2020_digital.pdf [accessed March 2021]
- ¹² Mayor of London (n.d) The London Plan (2021) Retrieved from <https://www.london.gov.uk/what-we-do/planning/london-plan> [assessed March 2021]
- ¹³ Brown, K. (2017). The hidden problem of overheating [webpage]. Retrieved from <https://www.theccc.org.uk/2017/08/08/hidden-problem-overheating/>
- ¹⁴ London Climate Change Partnership. (n.d.). Heatwaves [webpage]. Retrieved from <http://climatelondon.org/climate-change/heatwaves/> [accessed March 2021].
- ¹⁵ GLA. (2011). UrbClim Simulation. Greater London Authority. Retrieved from <https://data.london.gov.uk/dataset/london-s-urban-heat-island---average-summer>
- ¹⁶ GLA. (2012). *Better Environment, Better Health*. Great Londoner Authority. Retrieved from https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Better%20Environment%2C%20Better%20Health%20%28Croydon%2C%20031013%29.docx081113.docxAF.pdf
- ¹⁷ Spatial Planning Service. (2018). *Croydon Local Plan 2018*. Retrieved from https://new.croydon.gov.uk/sites/default/files/Planning/Regeneration/Croydon_Local_Plan_2018.pdf
- ¹⁸ Flood Risk Information v0.2 July 2020 Croydon Resilience Forum
- ¹⁹ Croydon.gov.uk (n.d.) Strategic Flood Risk Assessment <https://www.croydon.gov.uk/planning-and-regeneration/planning/planning-evidence-and-information/local-plan-evidence-topic/climate-change> [webpage] [assessed March 2021]

- ²⁰ Croydon.gov.uk (n.d.) Multi-Agency Flood Response Guidance <https://www.croydon.gov.uk/sites/default/files/Croydon%20Multi-Agency%20Flood%20Response%20Guidance%20%28v3.0%20Oct%202020%29.pdf> [assessed March 2021]
- ²¹ Croydon.gov.uk. (n.d.). Local Plan evidence by topic [webpage]. Retrieved from <https://new.croydon.gov.uk/planning-and-regeneration/planning/planning-evidence-and-information/local-plan-evidence-topic/nature-and-open-space> [accessed March 2021].
- ²² Climate Just. (n.d.). Socially vulnerable groups sensitive to climate impacts [webpage]. Retrieved from <https://www.climatejust.org.uk/socially-vulnerable-groups-sensitive-climate-impacts> [accessed March 2021].
- ²³ Croydon.gov.uk (n.d.) Climate Change Adaptation Action Plan <https://www.croydon.gov.uk/planning-and-regeneration/planning/planning-evidence-and-information/local-plan-evidence-topic/climate-change> [webpage] [accessed March 2021]
- ²⁴ Your Croydon. (2020). Electric vehicle charging points set to make a great start to 2020 [webpage]. Retrieved from <https://news.croydon.gov.uk/electric-vehicle-charging-points-set-to-make-a-green-start-to-2020/>
- ²⁵ Croydon.gov.uk. (n.d.). How School Streets work [webpage]. Retrieved from <https://news.croydon.gov.uk/school-streets/how-school-streets-work> [accessed March 2021].
- ²⁶ Your Croydon. (2019). New parking charges reward greener drivers [webpage]. Retrieved from <https://news.croydon.gov.uk/new-parking-charges-reward-greener-drivers/>
- ²⁷ Croydon.gov.uk. (2019). *Liveable Neighbourhood – Reconnecting Old Town*. Retrieved from https://insidecroydon.com/wp-content/uploads/2019/05/liveable-neighbourhood-overview_lcc.pdf
- ²⁸ Your Croydon. (2019). Croydon joins National Tree-Planting Week [webpage]. Retrieved from <https://news.croydon.gov.uk/croydon-joins-national-tree-planting-week/>
- ²⁹ <https://lovecleanair.org/wp-content/uploads/2014/11/Croydon-Air-Quality-Action-Plan-2012-2017.pdf> [webpage] [accessed March 2021]
- ³⁰ Croydon.gov.uk. (n.d.). Croydon Green Fund [webpage]. Retrieved from https://new.croydon.gov.uk/community-and-safety/advice-and-funding-community-groups/funding-opportunities/croydon-green-fund?utm_campaign=redirect&utm_medium=alias&utm_source=community/advice/tsfunding/funding/green-croydon-fund [accessed March 2021].
- ³¹ Spatial Planning Service. (2018). *Croydon Local Plan 2018*. Retrieved from https://new.croydon.gov.uk/sites/default/files/Planning/Regeneration/Croydon_Local_Plan_2018.pdf
- ³² BREEAM. (n.d.). Building back better with BREEAM [webpage]. Retrieved from <https://www.breeam.com/> [accessed March 2021].
- ³³ CLES. (2020). *Owning the economy*. Retrieved from <https://cles.org.uk/wp-content/uploads/2020/10/Community-Wealth-Building-2020-final-version.pdf>
- ³⁴ Women4Climate. (n.d.). *Gender inclusive climate action cities*. Retrieved from https://w4c.org/sites/default/files/2019-02/W4C_REPORT_Gender%20Inclusive%20Climate%20Action%20in%20Cities_BD.pdf [accessed March 2021].
- ³⁵ Living Streets. (n.d.). Creating low-traffic neighbourhoods [webpage]. Retrieved from <https://www.livingstreets.org.uk/about-us/our-work-in-action/creating-low-traffic-neighbourhoods> [accessed March 2021].
- ³⁶ Goodman, A. & Aldred, R. (2021). The impact of introducing a low-traffic neighbourhood on street crime in Waltham Forest London. *Transport Findings*. Retrieved from

<https://findingspress.org/article/19414-the-impact-of-introducing-a-low-traffic-neighbourhood-on-street-crime-in-waltham-forest-london>

³⁷ Loakes, C. (n.d.). *Creating a 'mini-Holland' in Waltham Forest*. Retrieved from

<https://camdenresidentsbath.org/wp-content/uploads/2020/02/Bath-NES-Presentation-Cllr-Loakes-1.pdf> [accessed March 2021].

³⁸ GLA. (2019). Air pollution exposure in London: Impact of the Environment Strategy [webpage]. Retrieved from <https://www.london.gov.uk/what-we-do/environment/environment-publications/air-pollution-london-impact-environment-strategy>

³⁹ London Cycling Campaign and Living Streets. (n.d.) *A Guide to Low Traffic Neighbourhoods*. Retrieved from

<https://londonlivingstreets.files.wordpress.com/2018/09/lcc021-low-traffic-neighbourhoods-detail-v9.pdf> [accessed March 2021].

⁴⁰ Aldred, R., Verlinghieri, E., Sharkey, M., Itova, I., & Goodman, A. (2021). Equity in new active travel infrastructure: a spatial analysis of London's new Low Traffic Neighbourhoods. *SocArXiv*. Retrieved from <https://osf.io/preprints/socarxiv/q87fu/>

⁴¹ Spatial Planning Service. (2018). *Croydon Local Plan 2018*. Retrieved from https://new.croydon.gov.uk/sites/default/files/Planning/Regeneration/Croydon_Local_Plan_2018.pdf

⁴² Keep Britain Tidy. (2013). *Eco-Schools England*. Retrieved from

https://www.keepbritaintidy.org/sites/default/files/resources/KBT_Eco-Schools_Informing_a_new_horizon_2013.pdf

⁴³ Marix Evans, L. (2020). *Local authorities and the sixth carbon budget*. Climate Change Committee. Retrieved from <https://www.theccc.org.uk/wp-content/uploads/2020/12/Local-Authorities-and-the-Sixth-Carbon-Budget.pdf>

⁴⁴ Barrett, S., Wedderburn, M., & Belcher, E. (2019). *Green Light: Next generation road user charging for a healthier, more liveable London*. Retrieved from

<https://www.centreforlondon.org/wp-content/uploads/2019/04/Next-Generation-Road-User-Charging.pdf>

This page is intentionally left blank

Equality Analysis Form

1. Introduction

1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	Place
Title of proposed change	Croydon Climate Crisis Commission recommendations
Name of Officer carrying out Equality Analysis	John Montes

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Adoption of the recommendations of Croydon Climate Crisis Commission and the seeking of resources to fund a project officer are necessary steps to develop a delivery plan, and resource actions in response to the Climate and Ecological Emergency declared by Croydon Council in July 2019 and its decision to become carbon neutral by 2030.

The recommendations of Croydon Climate Crisis Commission aim to assist the adaptation to climate change as well as reduce carbon emissions. They will impact on the council’s policies, strategies and plans; projects and programmes; and procurement processes and are designed to ensure that the transition to zero carbon happens in a fair and just way, improving wellbeing, reducing inequality and providing good quality jobs. They support a green economic recovery from the impact of the Covid lockdown. The measures contained in this report should therefore have a positive impact on all residents, including those who share protected characteristics.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative

Table 1 – Positive/Negative impact

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	<p>The proposal aims to improve air quality which will benefit all ages but especially those suffering with childhood and lifelong asthma</p> <p>Croydon has more than 17,000 fuel poor households. Measures to improve the energy efficiency of homes will enable more people to live in warm homes, reducing fuel poverty, and particularly benefit older people who spend more time at home and live on lower incomes</p>	N/A	Carbon emissions data in report & Air Quality action plan 2018-22
Disability	<p>Croydon has more than 17,000 fuel poor households. Measures to improve the energy efficiency of homes will enable more people to live in warm homes, reducing fuel poverty, and particularly benefit people with a</p>	<p>Commission recommendations advocate less travel by car through reduction of parking spaces and more public transport and active travel. While this could have negatively impacted some people with a disability who</p>	Consultation

	disability or suffer from poor health who spend more time at home and live on lower incomes.	need to use a car, the council's response is not to reduce car parking spaces, but instead through pricing policy to encourage people to get low emission vehicles and car clubs to use electrical vehicles.	
Gender	N/A	N/A	N/A
Gender Reassignment	N/A	N/A	N/A
Marriage or Civil Partnership	N/A	N/A	N/A
Religion or belief	N/A	N/A	N/A
Race	The proposal aims to improve air quality, which will have a positive impact on health, in particular for Black, Asian and other minority communities who are socially vulnerable due to environmental and social inequalities which may impact on their health and for others living in disadvantaged areas.	N/A	N/A
Sexual Orientation	N/A	N/A	N/A
Pregnancy or Maternity	N/A	N/A	N/A

Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

3.2 Additional information needed to determine impact of proposed change

Table 2 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:		
Additional information needed and or Consultation Findings	Information source	Date for completion
Consultation with the public and stakeholders	Consultation	TBC – Oct/Nov

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Table 3 – Impact scores

<p>Column 1</p> <p>PROTECTED GROUP</p>	<p>Column 2</p> <p>LIKELIHOOD OF IMPACT SCORE</p> <p>Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Column 3</p> <p>SEVERITY OF IMPACT SCORE</p> <p>Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Column 4</p> <p>EQUALITY IMPACT SCORE</p> <p>Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p>Equality impact score = likelihood of impact score x severity of impact score.</p>
Age	2	2	4
Disability	2	2	4
Gender	1	1	2
Gender reassignment	1	1	2
Marriage / Civil Partnership	1	1	2
Race	2	2	4
Religion or belief	1	1	2
Sexual Orientation	1	1	2
Pregnancy or Maternity	1	1	2

Equality Analysis

4. Statutory duties

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	Commission recommendations advocate less travel by car through reduction of parking spaces and more public transport and active travel. Unmitigated this could have negatively impacted some people with a While this could have negatively impacted some people	The council's response is not to reduce car parking spaces, but instead through pricing to encourage people to get low emission vehicles and car clubs to use electrical vehicles, so emissions are reduced.	Council	Proposal already amended

Equality Analysis

	with a disability who need to use a car.			
Race	N/A	N/A	N/A	N/A
Sex (gender)	N/A	N/A	N/A	N/A
Gender reassignment	N/A	N/A	N/A	N/A
Sexual orientation	N/A	N/A	N/A	N/A
Age	N/A	N/A	N/A	N/A
Religion or belief	N/A	N/A	N/A	N/A
Pregnancy or maternity	N/A	N/A	N/A	N/A
Marriage/civil partnership	N/A	N/A	N/A	N/A

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter **X** in column 3 (**Conclusion**) alongside the relevant statement to show your conclusion.

Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form	x
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	

Equality Analysis

Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet	Meeting title: N/A Date:	

7. Sign-Off

Officers that must approve this decision		
Equalities Lead	Name: Yvonne Okiyo Position: Equalities Manager	Date: 20.04.21
Director	Name: Position:	Date:

REPORT TO:	CABINET 7 June 2021
SUBJECT:	YOURCARE (CROYDON) OPTIONS APPRAISAL
LEAD OFFICER:	RACHEL SONI, INTERIM DIRECTOR OF COMMISSIONING & PROCUREMENT ASMAT HUSSAIN, INTERIM EXECUTIVE DIRECTOR RESOURCES
CABINET MEMBER:	COUNCILLOR CALLTON YOUNG, CABINET MEMBER FOR RESOURCES AND FINANCIAL GOVERNANCE COUNCILLOR JANET CAMPBELL, CABINET MEMBER FOR FAMILIES, HEALTH AND SOCIAL CARE
WARDS:	All
<p>COUNCIL PRIORITY/POLICY CONTEXT</p> <p>This report and the recommendations contained within it support the following Croydon Renewal Plan priorities:</p> <ul style="list-style-type: none"> • We will live within our means, balance the books and provide value for money for our residents. • We will focus on providing the best quality core service we can afford. First and foremost, providing social care services that keep our most vulnerable residents safe and healthy. And to keep our streets clean and safe. • To ensure we get full benefit from every pound we spend, other services in these areas will only be provided where they can be shown to have a direct benefit in keeping people safe and reducing demand. 	
<p>FINANCIAL IMPACT</p> <p>YourCare (Croydon) Limited is a private retail company wholly owned by Croydon Council and set up in May 2017. YourCare started trading in April 2018 with the objective of becoming the retailer of choice for daily living aids in Croydon. The creation of the company was agreed by a leader's delegation to the Executive Director (People) in consultation with the Cabinet member for Finance and treasury and the Cabinet Member for Families, Health and Social Care on the 25th of January 2017</p> <p>Over the last two years a number of external factors have impacted the development of YourCare and its viability. In light of the Council's journey to becoming an efficient, effective and financially sustainable council, coupled with the impact of the Covid-19 pandemic on the retail sector, it has become critical to review the position of YourCare.</p> <p>At the end of June 2021, YourCare is expected to have a gross debt of £291k and</p>	

cumulated losses of £238k.

The Council is holding a provision of £94k which will be netted off against the debt. This will result in a write off debt of £197k (made up of a loan, including interest, and outstanding fees for services to the company) and the Council will be required to cover this through an annual average Minimum Revenue Provision of c£4k over a 40 year period.

This will be covered within the Council's corporate Minimum Revenue Provision (MRP) budget from 2021/22 onwards.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

The Cabinet (acting, where relevant, on behalf of the Council exercising its functions as sole shareholder of YourCare (Croydon) Ltd), is recommended to

- 1.1 Note the Shareholder review reports of YourCare (Croydon) Limited included in the background documents.
- 1.2 Agree to closing down the activities of YourCare (Croydon) Limited. The company will cease trading and all assets to be settled in accordance with the liquidation process.
- 1.3 Agree to the appointment of an authorised insolvency practitioner as liquidator to take charge of liquidating the company.
- 1.4 To note as a result of the closing down of YourCare (Croydon) Ltd, the Council, as the company's only creditor, will write off the accumulated trade debts of £189k and the loan of £81k including interest (total £11k) to the extent that these debts are not recovered as part of the liquidation process (as further explained in paragraph 6 of this report).
- 1.5 Delegate authority to the Interim Executive Director of Resources, in consultation with the Interim Director of Finance, Investment and Risk, and Interim Director of Law & Governance, to do all things necessary for the purpose of giving effect to the above recommendations, including acting as shareholder to complete relevant shareholder resolutions and give direction to the company.

2. EXECUTIVE SUMMARY

- 2.1 The Council has set up a Working Group for Review of Council's Companies, which considers the immediate financial position of each entity and future governance. The working group was consulted on the options and recommendation to close down YourCare (Croydon) Ltd.

- YourCare (Croydon) Limited provides a retail offer for equipment and daily living aids to members of the public. With the ongoing adverse impact of the pandemic and deteriorating market conditions, the financial position is worsening. It has been identified that the Council will be exposed to these adverse conditions and thus resulting in increased cost pressures in the future. The Working Group for Council's Companies has advised that in order to reduce the Council's exposure it is best to close down YourCare (Croydon) Limited.
- 2.2 YourCare (Croydon) Limited started trading in April 2018 with the ambitious target of being the retailer of choice for daily living equipment in Croydon.
- 2.3 YourCare (Croydon) Limited was set up to build on the Community Equipment Service (CES) excellent local reputation and develop an online presence, offering products directly to Croydon residents as well as residents of other local authorities.
- 2.4 Whilst at the time of its creation there was a clear rationale and opportunity for the development of a retail model, complementing CES business operations, the current adverse market conditions have made it unsustainable for YourCare to continue trading.
- 2.5 The initial business plan presented to members in November 2017, assumed breakeven in the third year of operation (2019/20) with accumulated loss of £217k.
- 2.6 Even though key progress has been made in developing YourCare into a successful business, a number of external factors have prevented YourCare from achieving the expected return. Among those factors we can identify:
- The two year delay in moving to a fit for purpose retail/shop facility. Having a fit for purpose facility was a key requisite for delivering the YourCare business strategy.
 - The delayed move coincided with the Covid-19 crisis and 3 successive lockdowns preventing YourCare from benefitting of its new facilities
 - The ongoing Covid-19 crisis and its short, medium and long term impact on the retail sector.
 - The UK falling into recession due to the COVID-19 crisis with GDP slumping by as much as 20% in the quarter to June 2020 after falling by 2.2% in the first quarter of 2020.
 - Supply chain challenges (Brexit, Steel and foam shortages) have severely impacted sales volume
 - As a shareholder, Croydon Council is facing significant financial challenges and is taking steps to rationalise its spend and investment.
- 2.7 An option appraisal was undertaken by the board of directors last year to assess the viability of YourCare and implement necessary adjustment. Since then the position has worsened and it has therefore become necessary to undertake another review.
- 2.8 This report sets out the options available for YourCare and the rationale for the recommendations made.

3. DETAIL

3.1 Background

- 3.1.1 All local authorities and health partners commission or provide an equipment service, linked to adult social care. This has two functions:
- The purchasing of equipment and
 - The delivery and installation of equipment.

This forms a core part of the health and social care offer.

- 3.1.2 The equipment services play an important role in supporting local authorities and health partners in the delivery of key agendas including managing increasing demand, integration, prevention, hospital discharge and admission avoidance.

For five years from 2011 to 2016 the equipment service was delivered through Croydon Care Solutions, the Council's Local Authority Trading Company (LATC).

- 3.1.3 A governance review of Croydon Care Solutions took place in the summer of 2015. This review identified that the company was loss making and whilst elements of the service model had potential, the structure and delivery model needed considering.
- 3.1.4 In June 2016, the Council took the strategic decision to insource the equipment service and wind down the LATC. The insourcing of the equipment service was completed in December 2016 into the Commissioning and Procurement division in the Resources Department.
- 3.1.5 The insourced structure was integrated into the Commissioning and procurement division under the name Community Equipment Service (CES). CES was to be a key provider in helping to deliver social care and health transformation programs for both Croydon and other local authorities.
- 3.1.6 The Council has statutory duty under the care act to provide daily living aids equipment for resident with assessed needs. Therefore a separate private company (YourCare) had to be created to provide a vehicle to trade with members of the public and meet the demand for living aids.
- 3.1.7 YourCare was to complement the CES offer with a retail component under the personalisation agenda. This was to uniquely position CES to offer products and services that meet needs across the whole spectrum of social care, from low level simple aids to complex equipment.
- 3.1.8 As part of the insourcing process, a new five year business plan was created to achieve a number of key business objectives. The main objectives of the insourcing were:
- To turnaround the service into a profitable business, bringing social and financial benefit to Croydon.
 - To invest into the service in order to ensure long term sustainability and growth.

- To establish and grow the retail offer initially in Croydon and in turn with our partner authorities.
- To position CES as a key strategic partner in the health and social care market.

3.2 The retail model

3.2.1 Policy context

3.2.1.1 The Retail Model is part of the Government's Personalisation agenda. The Retail Model relates to moving simple equipment into the retail market place so that the service users have greater choice, control and independence over their equipment provision. They can choose the product that best suits their lifestyle. If their choice costs more than the item on prescription, they can opt to pay the difference to the retailer. Consequently, where a service user is assessed as eligible for simple aids for daily living equipment provision, they can take their prescription to a local accredited retailer who will exchange it for the items of equipment required. The model improves accessibility to these products for all users i.e. both state and self-funded. The model, by opening up the market place for community equipment, empowers individuals to self-help thereby supporting the prevention and personalisation agenda.

3.2.1.2 Community Equipment providers are now required as part of tenders to support the Retail Model by offering facilities for displaying and demonstrating equipment to service user, web portals and payment system.

3.2.2 Demographic and economic context

3.2.2.1 The COMODAL market analysis estimated the overall retail value of the market (in 2011) for self-funded products only to be £404 million pounds. With public sector service provision diminishing due to reducing budgets and stringent application of the Fair Access to Care Services criteria (FACS), there is no doubt that the consumer market will grow to meet the levels of future demand.

3.2.2.2 The case for a consumer market for assisted living technology and services is getting stronger. Since the late 1980s, consecutive governments in the UK have supported the preference for people with health and social care needs to retain their independence and remain in their own homes for as long as possible. This preference is also supported by the need for people to embrace self-management and control of their own healthcare both in terms of those with long term conditions and the wider well-being agenda.

Older people are major users of health and social care services. As a consumer group, this market is set to grow significantly as the age of the population increases. This presents an enormous opportunity for those companies willing to address the needs of people as they get older.

3.2.2.3 The 2011 population estimates from the Office for National Statistics showed that:

- Over 30 per cent of the UK population was above the age of 50 and they held 80 per cent of the wealth in the country

- There was more people In the UK above the age of 60 than under 18
- By 2083 one in three people would be over 60
- Households headed by someone aged 65+ contributed about £121 billion of spending power every year. For the 50 plus group as a whole, it was Over £300 billion a year
- The spending power of the over 65s was £76 billion, and was set to grow to £127 Billion by 2030; a growth of 68%

3.2.3 Scope of services

3.2.3.1 The evidence of a market, both local and national, supported the rationale that the Community Equipment Service should position itself in the market place as a trusted provider of all age equipment products and services.

The business strategy therefore was to build a retail service through an appropriate delivery model consistent with the provisions and requirements of the council under the Care Act.

The commercial objective of the retail company was:

- To successfully trade for commercial purposes,
- Becoming the retailer of choice with private consumers of community equipment. The scope of services to be provided was based upon assessments of the retail market place and gaps in provision. These services included the following:
 - Simple aids to daily living, such as walking frames, perching stools
 - Complex aids to daily living, such as beds
 - Telecare stand-alone products, such as sensors and monitors
 - Mobility equipment, such as mobility scooters
 - Minor adaptations to properties, such as wheelchair ramps.
 - Private assessments on product requirements.

To ensure that all activities carried out by the company were outside the scope of the Care Act, the retail business would sell to the following customer base:

- Customers who are outside the borough and who wish to purchase privately from the retail service
- Customers who have been assessed by the Council as having no eligible needs, but who still wish to purchase equipment.

3.2.3.2 Key investment and development required in order for this business model to be successful included the following:

- A fit for purpose retail outlet, including clinical assessment space and independent living centre.
- Telephony system to support incoming sales calls.
- Website (s) including online shopping and assessment capability.
- Sales and Customer Relationship management system.
- Marketing and sales strategy resource.
- Retail equipment subject matter experts and trusted assessors.
- Mail order shipping resources.

3.2.4 Company Structure and financing

3.2.4.1 YourCare was set up as a separate limited company wholly owned by Croydon Council with the original directors Appointed on the 8th of June 2017:

- Director of Communities Strategy and Commissioning
- Director of Adults Social Care
- Assistant Director of Finance
- Head of Strategy, Communities and Commissioning Adults
- Head of Strategy, Communities and Commissioning Children's

3.2.4.2 The current directors are :

- Paul Kouassi, Head of the Community Equipment Service Appointed on 18th March 2019
- Mirella Peters ,Head of Finance, Appointed on 18th March 2019
- Annette McPartland, Director of Operations, Appointed on 2nd April 2019
- Rachel Soni, Interim Director of Commissioning and Procurement, Appointed on 15th November 2020

3.2.4.3 The company operates independently from the Council with office support functions (payroll support, company secretarial support, legal services and retail staffing) being "bought" from the Council through the provision of a contract for services. The Council provides these services at market rates so that the company is not receiving state aid from the Council.

3.2.4.4 A loan facility of £250,000 from Croydon Council on commercial terms was agreed to support the initial launch activity and cash flow needs. To this date £80k of this facility has been drawn down, and £10k has been repaid.

3.3 Progress to date

3.3.1 YourCare's three core priorities were as follows:

- Provide a viable alternative provision to self-funders for simple aids to support the preventative agenda and to establish YourCare as the "go to" provider for all
- Establish YourCare across all existing and new CES partnerships as a benchmark model for self-funding clients.
- Establish third Party Partnerships (Care Homes, Suppliers etc.)

A key requisite for delivering these priorities was to have a fit for purpose premises from which to operate and trade. The agreed business plan assumed that YourCare was to move within 12 months of its launch to the new purpose built premises in order to deliver a breakeven position in year 3 of operation.

Table1: YourCare 2017 Business plan

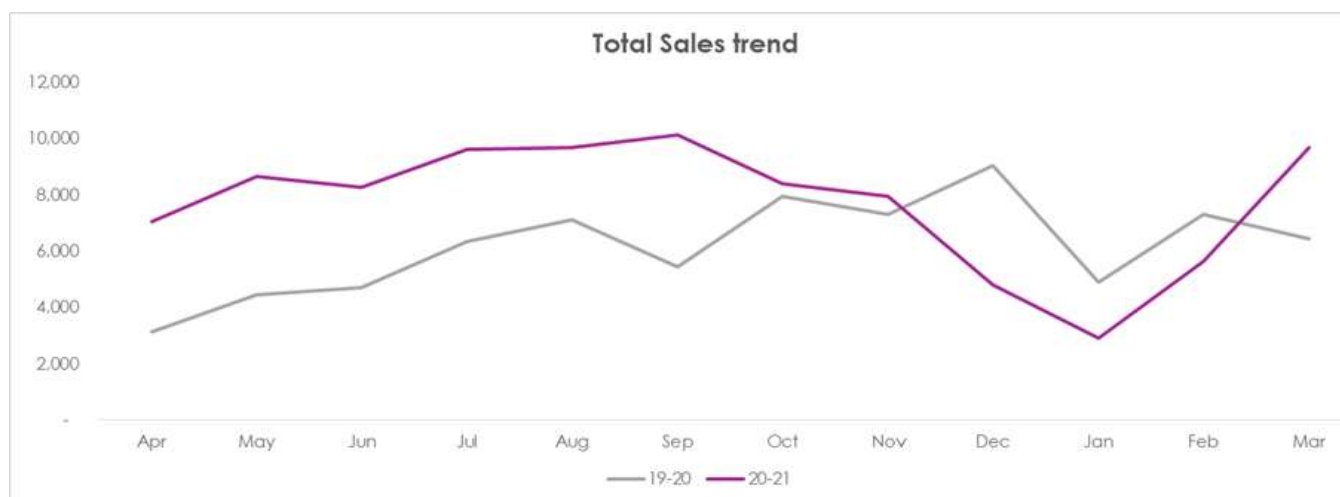
	2017/18	2018/19	2019/20	2020/21	2021/22
	Year1	Year2	Year3	Year4	Year5
	£'s	£'s	£'s	£'s	£'s
Sales Income	160,000	406,666	728,665	1,234,999	1,969,999
Cost of sales	(224,311)	(370,492)	(614,090)	(987,178)	(1,513,366)
Gross margin	(64,311)	36,174	114,575	247,821	456,633
Direct cost	(22,955)	(76,865)	(45,265)	(49,385)	(55,409)
Overheads	(38,775)	(54,230)	(65,557)	(70,535)	(85,881)
Net profit/(loss)	(126,040)	(94,920)	3,753	127,901	315,343
Cumulated profit/(loss)	(126,040)	(220,960)	(217,207)	(89,306)	226,037

3.3.2 The move to a new purpose built facility was delayed until March 2020 in the midst of the Coronavirus pandemic. This delay compounded with the Covid-19 global crisis and its devastating impact on the retail market has caused us to reconsider the expected growth for YourCare and its business model.

3 consecutive lockdowns have forced us to focus on an online only model and capitalize on the growth of this channel while reducing cost.

Unfortunately a number of global factors (Brexit, shortage of foam and steel) have caused significant disruption in the supply chain resulting in YourCare being unable to fulfill orders and online sales.

Table 2: YourCare sales trend (19/20 vs 20/21)



Despite a very challenging environment marked by a global pandemic, global supply chain disruption and economic recession, sales for YourCare have grown with full year revenue expected to be 25% ahead of last year (shop - 50%, online +140%).

Table 3: YourCare online marketing return and user volume trend

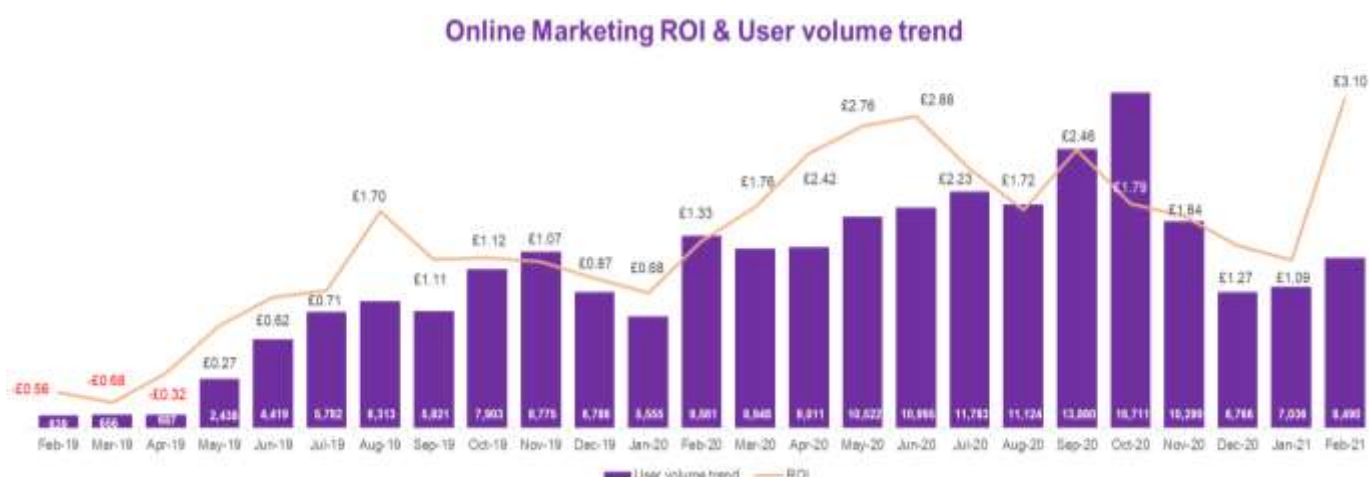


Table 4: YourCare P&L (18/19-20/21)

	2018/19	2019/20	2020/21
	Actual	Actual	Actual
Shop	52,837	44,910	22,330
Online	9,342	29,386	70,554
Income	62,179	74,296	92,883
% YoY Growth	-	19%	25%
Cost of Sale	39,574	53,621	73,658
% of Income	64%	72%	79%
Gross Margin	22,605	20,675	19,226
Gross margin %	36%	28%	21%
Direct Cost	82,232	108,710	109,531
Net Profit/(Loss)	(59,627)	(88,035)	(90,305)
Cumulative Profit/(L)	(59,627)	(147,662)	(237,967)
Trade Debt (LBC)	(28,332)	(97,668)	(189,020)
loan (LBC)	(83,400)	(86,945)	(80,640)
Total Debt	(111,732)	(184,612)	(269,660)

The Full Year position at the end of 20/21 is a cumulative loss of £238k, with debt of £270k.

3.4 Options appraisal and recommendation

3.4.1 YourCare set out with an ambitious target of being the retailer of choice for daily living equipment. Now in its third year of operation, a lot of progress has been made, but the landscape has also vastly changed with:

- Croydon Council facing significant financial challenges
- The UK falling into recession due to the COVID-19 crisis
- The ongoing Covid-19 crisis and its short, medium and long term impact on the Retail sector.

At a time where we need to rationalise our resources, we believe that there is a need to review our business model and its viability. The board of directors has previously conducted a review of the business model with the recommendation of the online only model. However since this recommendation, the trading conditions have worsened and sales growth have been negatively impacted.

Based on the assessment of the economic environment and the progress made so far the options under consideration are:

- Option 1 : Keep the current business model (Online only)
- Option 2 : Close down the business

3.4.2 Option 1: Keep the current business model (Online only)

Table 5: YourCare P&L online only option

	2018/19	2019/20	2020/21	21/22	22/23	23/24	24/25
	Actual	Actual	Actual	Budget	Budget	Budget	Budget
Shop	52,837	44,910	22,330	-	-	-	-
Online	9,342	29,386	70,554	149,880	217,325	304,255	425,958
Income	62,179	74,296	92,883	149,880	217,325	304,255	425,958
% YoY Growth	-	19%	25%	61%	45%	40%	40%
Cost of Sale	39,574	53,621	73,658	118,405	162,994	212,979	298,170
% of Income	64%	72%	79%	79%	75%	70%	70%
Gross Margin	22,605	20,675	19,226	31,475	54,331	91,277	127,787
Gross margin %	36%	28%	21%	21%	25%	30%	30%
Direct Cost	82,232	108,710	109,531	115,368	114,246	119,775	125,702
Net Profit/(Loss)	(59,627)	(88,035)	(90,305)	(83,893)	(59,915)	(28,498)	2,085
Cumulative Profit/(L)	(59,627)	(147,662)	(237,967)	(321,860)	(381,774)	(410,273)	(408,188)
Trade Debt (LBC)	(28,332)	(97,668)	(189,020)	(270,826)	(348,205)	(419,501)	(480,693)
loan (LBC)	(83,400)	(86,945)	(80,640)	(57,937)	0	0	0
Total Debt	(111,732)	(184,612)	(269,660)	(328,763)	(348,205)	(419,501)	(480,693)

Strengths

- Capitalize on growing channel and new customer behaviour
- Reduced running cost, debts and losses
- Maintain “retail model” as part of the CES offer

Weaknesses

- Single sales channel
- Brand awareness
- Trajectory of 4 years to break even with cumulated losses of £408k and debt of £481k
- Additional online marketing will be necessary to drive improved online income
- Existing website is not as dynamic as key competitors, and will require further investments to be a viable contender.

Opportunities

- Grow online presence

- Prescribers pathway with existing partners
- Complete offering allowing CES to capture new business
- Repayment of the Council investment

Threats

- Current economic crisis impacting purchasing power of target customers
- Covid-19 pandemic long term impact on the retail sector
- More established competitors
- Shareholder financial position

3.4.3 Option 2: Close down the business

Table 6: YourCare P&L Close down option

	2018/19	2019/20	2020/21	21/22
	Actual	Actual	Actual	Budget
Shop	52,837	44,910	22,330	-
Online	9,342	29,386	70,554	74,940
Income	62,179	74,296	92,883	74,940
% YoY Growth	-	19%	25%	-19%
Cost of Sale	39,574	53,621	73,658	59,202
% of Income	64%	72%	79%	79%
Gross Margin	22,605	20,675	19,226	15,737
Gross margin %	36%	28%	21%	21%
Direct Cost	82,232	108,710	109,531	57,684
Net Profit/(Loss)	(59,627)	(88,035)	(90,305)	(41,946)
Cumulative Profit/(L)	(59,627)	(147,662)	(237,967)	(279,913)
Trade Debt (LBC)	(28,332)	(97,668)	(189,020)	(229,923)
loan (LBC)	(83,400)	(86,945)	(80,640)	(77,127)
Total Debt	(111,732)	(184,612)	(269,660)	(307,050)

Strengths

- Elimination of any further financial risk for the Council

Weaknesses

- Inability to take advantage of any change in the market conditions
- Prevent any return on Council investment
- Hinders CES growth with lack of "retail model"

Opportunities

- Management time to be solely focused on CES growth opportunities

Threats

- Potential of having to start all over again in a few years

4. REASONS FOR RECOMMENDATIONS/DECISIONS

- 4.1 The extremely challenging economic landscape coupled with the uncertainty facing the UK retail industry and the financial context of the Council means that while YourCare has shown potential, the Council can no longer afford to have a retail business still in its infancy and 4 years removed from breaking even.
- 4.2 Recent months have seen the collapse of high street giants like the Arcadia group (Topshop, Burton, Dorothy Perkins) or even the 242-year-old retailer Debenhams. While at the same time, online retailer like Boohoo and Asos were able to capitalize and buy part of these high street retailers.
- 4.3 It is clear that change of consumer behaviour will fuel online retail growth. The Challenge for YourCare is how quickly this growth can translate into profit. The current trajectory of 4 years with risk and exposure continuing to grow to up to £481k is not sustainable.

5. HUMAN RESOURCES IMPACT

- 5.1 The company does not have any employees. Members of staff from CES have their time “bought” through the provision of a contract for services.
- 5.2 The closure of YourCare will potentially affect 5 members of staff. The plan is to redeploy most staff with potential cost for redundancy of around £5k. The impact on the workforce will be set out through specific proposals and the Council’s HR policies on consultation and managing organisational change will be followed.
- 5.3 We will consult with recognised trade unions in accordance with the collective bargaining arrangements on the proposals and cumulative impact across the workforce.

Approved by: Sue Moorman, Director of Human Resources

6. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1. In the current market conditions YourCare is no longer able to break-even in the time period agreed in 2017. The delay in moving to a suitable retail premises combined with the effects of Covid-19 on the retail sector has had a significant detrimental effect to the profitability plans. The outlook is that it will take until 2024/25 for YourCare to become profitable, as an online only entity. Which is not a viable option given the Council’s current financial situation.
- 6.2. The exposure to the Council is likely to be reduced if action is taken sooner rather than later as this reduces the ongoing costs the Council is incurring from providing chargeable staff time and expecting an income recharge to cover the costs from YourCare Ltd. Table 7 below provides a summary of the costs the Council will incur as a result of closing down the Company. These are projected to be costs up until the end of June 2021 and the total cost to the Council will be £0.192m which will be covered through corporate contingency.

- 6.3. Through historic financial management, CES has held a provision of £0.094m for bad debts .This will be used to offset part of the costs to the Council. For the period from March to June 2021, CES is expected to provide a total of £0.020m of back office service. This debtor will be written off and will be netted off against the £0.094m of provision held against this debtor.
- 6.4. The Council had also lent £0.080m to YourCare (Croydon) Ltd when it was first set up and of this £0.010m has been paid back. There is an accrued interest amount of £0.0115m and the loan balance of £0.070m that will need to be written off and be charged to Corporate Budget.
- 6.5. The termination of the YourCare (Croydon) Ltd service will result in additional costs required to support the wind down of the company namely legal or insolvency practitioner costs and the likelihood of some staff redundancy. These are projected to be c£15k and it is anticipated that these could be funded from the sale of the outstanding inventory within the Company. As a result, this will not require the Council to fund these costs.
- 6.6. The Council has a contract of service in place with YourCare (Croydon) Ltd to provide back office services to the company. It is expected that the Council will need to provide support until end of June 21 to ensure all activity required to bring the service to a close are carried out.

Table 7: Debt impact

		As At 31 March 2021	As At 30 June 2021
		£	£
Trade Debt	Staff cost & Support services	189,020	209,149
Less:	Provision for bad debt	(93,668)	(93,668)
	Total trade Debt	95,353	115,481
LBC Debt	Loan	80,000	80,000
Less:	Repayment	(10,000)	(10,000)
	Interest	10,640	11,496
	Total Loan due	80,640	81,496
TOTAL COUNCIL EXPOSURE FROM DEBTS		175,992	196,977
	Insolvency and legal fees		10,000
	Potential redundancy cost		5,000
	Disposal of stock		(20,000)
TOTAL COUNCIL EXPOSURE (incl.Wind-up cost)		175,992	191,977

- 6.7. The closure of YourCare means that CES will no longer have a retail offer. This is likely to put CES at a disadvantage when bidding for new business in the future. This will need to be taken into consideration as part of CES growth objectives.

Approved by: Nish Popat, Head of Finance on behalf of Chris Buss, Interim

7. RESIDENTS IMPACT

- 7.1. The daily living aids market is a competitive market with a of large number of participants who can provide alternative services, both online and locally for Croydon residents. As part of any close down plan, the equality impact assessment will address any specific equalities impact, such as people with disabilities and older adults requiring equipment and contact will be made with residents requiring the service and a list of suitable alternative suppliers provided. Where there are concerns of vulnerability, the appropriate contact with services can be made. Those requiring equipment as part of an assessed need will continue to be provided with equipment through the Community Equipment Service commissioned by the Council and the NHS

8. LEGAL CONSIDERATIONS

- 8.1 Once the Council has set up a company using its general power of competence pursuant to Section 1 of the Localism Act 2011, the company is then governed by its articles of association. The Council may exercise its rights as sole shareholder of YourCare (Croydon) Ltd to pass a resolution to wind up the company given this is a shareholder reserved matter under the company's articles of association. This report also confirms that the Council is the sole creditor of the company.
- 8.2 There will be other related company resolutions to pass and processes to deal with in order to give effect to the recommendations set out in this report and therefore a delegation to the Interim Executive Director of Resources has been recommended.
- 8.3 In making decisions under this report, Members will need to be mindful of the Council's financial position, its fiduciary duties and the requirement to have regard to all relevant factors and to disregard irrelevant ones. The Council must act in accordance with the principles of Wednesbury reasonableness, meaning decisions that a rational person might make, having regard to all relevant considerations.

Approved by: Doutimi Aseh, Interim Director of Law & Governance and Interim Deputy Monitoring Officer

9. EQUALITY IMPACT

- 9.1 Any issues identified through the equality analysis will be given full consideration and agreed mitigating actions will be delivered through the standard mechanisms.

Approved by: Yvonne Okiyo, Equalities Manager

10. ENVIRONMENTAL IMPACT

10.1 There are no environmental issues arising from this report

11. DATA PROTECTION IMPLICATIONS

11.1. The company holds personal data, which must only be processed for Specific purposes. If the purpose for the processing expires, the data must be deleted. In light of the recommendation of this report, all customers will be contacted and informed that their data will no longer be held by the company. The personal data will then be erased using suitable technical and organizational measures to ensure security, as per the obligations of the company as a data controller.

CONTACT OFFICER:

Name:	Paul Kouassi
Post title:	Head of Community Equipment Service
Telephone no:	88078

BACKGROUND DOCUMENTS: Leader delegation - 0417LR
Leader delegation – DD390
Members presentation for the retail company
Office for National Statistics quarterly bulletin
Shareholder update November 2020
Shareholder update April 2021

This page is intentionally left blank

REPORT TO:	CABINET 7 June 2021
SUBJECT:	CALL-IN – REFERAL TO CABINET: CRYSTAL PALACE & SOUTH NORWOOD LOW TRAFFIC NEIGHBOURHOOD
LEAD OFFICER:	Asmat Hussain, Interim Executive Director Resources
LEAD MEMBER:	Councillor Sean Fitzsimons, Chair of Scrutiny & Overview Committee
WARDS:	Crystal Palace & Upper Norwood and South Norwood
COUNCIL PRIORITY 2020-2024	
<p>The recommendations of the decision that is the subject of the call in address the Council’s Corporate Plan priorities:</p> <ul style="list-style-type: none"> • Easy, accessible, safe and reliable, making it more convenient to travel between Croydon’s local places • Less reliance on cars, more willingness to use public transport, walk and cycle and • Invest in safe cycle lanes between central Croydon and local centres <p>Climate Emergency</p> <p>The recommendations address priorities in the Climate Change report and the resulting declaration of a ‘Climate Emergency’, priorities including:</p> <ul style="list-style-type: none"> • Croydon Council become carbon neutral by 2030; • Work with the Mayor of London to meet the aim for London to be a zero-carbon city by 2050; • Work with communities across Croydon to ensure that all residents and businesses are empowered and encouraged to play their part in making the Croydon the most sustainable borough in London; • Role of all elected Members in leading this agenda. 	
KEY DECISION REFERENCE: 6520SC	
<p>1. DECISION:</p> <p>The Cabinet is asked to:-</p> <p>1.1 Receive the referral made by the Scrutiny & Overview Committee following its consideration of a call-in request made on the key decision on the Crystal Palace and South Norwood Low Traffic Neighbourhood, and</p> <p>1.2 Reconsider the Original Decision taken by the Cabinet Member Sustainable Croydon (see paragraph 2.2 for details), in light of the concerns raised by the Scrutiny & Overview Committee and other relevant information listed at paragraph 3.2 of this report and decide whether or not it wishes to amend the decision, before taking the final decision.</p>	

2. EXECUTIVE SUMMARY

- 2.1 A meeting of the Scrutiny & Overview Committee was held on 23 March to consider a call-in of the Crystal Palace & South Norwood Low Traffic Neighbourhood key decision (6520SC). A copy of the call-in report considered by the Scrutiny and Overview Committee and the draft minutes of the meeting are attached at Appendices 9 and 10.
- 2.2 The decision taken by the Cabinet Member for Sustainable Croydon, that was the subject of the call-in request (the original decision) was:-

“Having carefully read and considered the Part A report, and the requirements of the Council’s public sector equality duty in relation to the issues detailed in the body of the reports, the Cabinet Member for Sustainable Croydon

RESOLVED to:

1. *Subject to Spending Control Panel agreeing to the spending of ring fenced grant funding to implement an Experimental Low Traffic Neighbourhood at Crystal Palace and South Norwood ‘Experimental LTN’ by the making of an Experimental Traffic Regulation Order (Experimental TRO) to operate for up to 18 months, to:*
 - a. *prohibit access and egress by motor vehicles (other than certain exempt vehicles) at the following locations:*
 - i. *Sylvan Hill at the common boundary of Nos.11 and 13*
 - ii *Lancaster Road junction with Goat House Bridge*
 - iii. *Fox Hill junction with Braybrooke Gardens*
 - iv. *Stambourne Way junction with Auckland Road*
 - v. *Bus gate introduced at the common boundary of Nos. 86 and 84a (Auckland Road Surgery) Auckland Road*
 - b. *These restrictions to be enforced through Automatic Number Plate Recognition (ANPR) camera technology.*
 - c. *The restrictions shall not apply in respect of:*
 - i. *a vehicle being used for fire brigade, ambulance or police purposes;*
 - ii. *anything done with the permission of a police constable in uniform or a civil enforcement officer;*
 - iii. *a vehicle being used for the purposes of a statutory undertaker in an emergency, such as the loss of supplies of gas, electricity or water to premises in the area, which necessitates the bringing of vehicles into a section of road to which the order applies;*
 - iv. *buses;*
 - v. *licensed taxis*
 - vi. *Dial-a-Ride vehicles;*
 - vii. *vehicles to which a valid exemption permit has been provided.*
 - d. *Introduce two disabled persons Blue Badge parking bays outside Nos 84 and 86 Auckland Road.*
2. *Instruct officers to continue to seek to work with those in Bromley Council to mitigate effects predicted to arise from the Experimental LTN in certain*

residential access streets in Bromley and to address concerns about potential effects on air quality.

3. *Delegate to the Director of Public Realm the authority to vary the provisions of the Experimental TRO including the exemptions to the restrictions.*
4. *In relation to Equality, agree:*
 - a. *that the equality implications of the recommended Experimental Traffic Regulation Order have been the subject of careful consideration in compliance with the Council's obligations under sections 1 and 149 of the Equality Act 2010;*
 - b. *nevertheless there should be further equality impact analysis including through focused engagement with the members of groups with protected characteristics potentially most affected by the proposed change in and around the area of the Experimental LTN during the operation and any change of the Experimental TRO;*
5. *Ensure that a recommendation on the future for the Experimental LTN be brought to the Traffic Management Advisory Committee at the appropriate time if considered desirable prior to the expiry of the Experimental TRO and in any event as soon as is practicable after 12 months of the experimental order being in place."*

2.3 During its consideration of this item, the Scrutiny and Overview Committee heard from a number of external speakers, who attended the meeting to present their views on the LTN. These including the relevant Executive Member & Assistant Director from LB Bromley, a local Member from LB Bromley whose ward bordered the proposed experimental LTN and community groups both for and against the scheme.

2.4 The Committee also extensively questioned both the Cabinet Member for Sustainable Croydon and officers on the reasons for the decision to introduce an experimental LTN in Crystal Palace and South Norwood. The evidence provided by the external speakers, the responses received to the questions raised by the Committee were used to inform the final decision on the call-in.

2.5 In line with the procedure rules set out in the Council's Constitution for Scrutiny considering a call-in (Part 4E – Scrutiny & Overview Procedure Rules, Section 11), the Committee had three outcomes it could consider using for the call-in.

These outcomes are:-

1. That no further action was necessary and the decision could be implemented as originally intended.
2. To refer the decision back to the Cabinet for reconsideration, outlining the nature of the Committee's concerns
3. To refer the decision to Council, if the Committee considered that the decision taken was outside of the Budget and Policy Framework.

2.6 Having reviewed the report provided with the agenda as well as the information gathered at the meeting, the Committee initially concluded that it would refer

the decision back to the decision maker (the Cabinet Member for Sustainable Croydon) for reconsideration. However, this was not an option available under the Council's Constitution. As such the Committee reconvened on 20 May 2021 to confirm its decision, which was to refer the decision to the Cabinet for reconsideration. The concerns of the Scrutiny Committee, on which this referral is made are outlined in the following section of the report.

3 CONCERNS OF THE SCRUTINY & OVERVIEW COMMITTEE

- 3.1 During its consideration of the call-in, Scrutiny & Overview Committee acknowledged that a benefit of using Experimental Traffic Orders is that they enable the Council to carry out iterative testing. This allowed the Council to gather data to establish the extent to which any such scheme positively contributed towards either reducing car usage or improving air quality in the borough. However, the Committee concluded that further consideration was needed to allow account to be taken of the following concerns:-
1. The Committee was concerned that the lack of clarification on the baseline data sources to be used for the experiment would make it difficult to quantifiably demonstrate the potential benefits arising from the experiment to the local community. As such that further work was needed to identify and refine the quantifiable data sources that would be used for the project. Additionally, in order to build public trust, confirmation of these data sources had to be made publicly available, prior to the start of the experiment in South Norwood & Crystal Palace.
 2. The Committee was concerned that it would be difficult for the public to have confidence in the benefits arising from the experiment without clearly defined success criteria. As such urgent work was needed to define a framework by which the success of the scheme would be assessed. This needed to be completed and made publicly available prior to the start of the experiment in South Norwood & Crystal Palace.
 3. The Committee was concerned about the potential impact the experiment may have upon the roads surrounding the LTN, particularly in regards to air quality. As such any monitoring installed as part of the experimental scheme needed to include the wider area. Additionally, given the potential negative impact on the air quality in the surrounding roads, mitigation needed to be identified as a matter of urgency, should there be a significant deterioration in air quality.
 4. The Committee was concerned that the level of engagement with Bromley Council to date had not resulted in an agreed way forward for the experiment, which was likely to result in a detrimental impact for those Bromley residents living closest to the scheme. As such further engagement with the London Borough of Bromley needed to be prioritised, to ensure that the appropriate mitigation was in place before the start of the experiment.
 5. Although reassurance was given about the level of consultation that would be undertaken throughout the experiment, it was agreed that the

engagement strategy for the Crystal Palace & South Norwood LTN project needed to be made publicly available as soon as possible.

6. In light of concerns raised about during the meeting about the level of signage used during the previous temporary scheme, there needed to be an ongoing review of the signage used during the life of the experimental scheme.
7. The Committee had a concern that it would be difficult to reduce congestion on residential roads while route-finding apps continue to include these roads as potential route options for motorists. As such the Committee would ask the Cabinet Member for Sustainable Croydon to give a commitment to working with other London boroughs to address the issue of route finding apps directing motorists through residential streets.
8. In light of the above concerns, it is requested that the Cabinet Member for Sustainable Croydon provides two updates to the Streets, Environment & Homes Sub-Committee. Firstly, before the start of the experiment to provide a response to the concerns of the Scrutiny & Overview Committee. Secondly, at the conclusion of the experiment to provide an update on the outcomes.

4 RECOMMENDATIONS TO CABINET

- 4.1 Cabinet is asked to reconsider the original decision taken by the Cabinet Member for Sustainable Croydon, taking account of the above concerns from the Scrutiny and Overview Committee. The Cabinet can decide to amend the original decision or not before taking the final decision.
- 4.2 To ensure that the Cabinet is able to take account of all the relevant considerations when making its decision, appended to this report are the following documents/webcasts:-

Webcast 1: [TMAC Meeting on 12 January 2021](#)

Appendix 1: Traffic Management Advisory Committee – 12 January 2021 – Presentation Slides

Appendix 2: Decision, 29 January 2021, Crystal Palace and South Norwood Low Traffic Neighbourhood

Webcast 2: [TMAC Meeting on 15 February 2021](#)

Appendix 3: Decision, 23 February 2021, Crystal Palace and South Norwood Low Traffic Neighbourhood

Appendix 4: Corporate Plan for Croydon 2018-2022

Appendix 5: Climate Change report

Appendix 6: Crystal Palace & South Norwood Low Traffic Neighbourhood Call-In Report, Scrutiny & Overview Committee – 23 March 2021.

Appendix 7: Scrutiny & Overview Committee – Additional Information provided in response to the call-in request.

Webcast 3: [Scrutiny & Overview Committee Meeting - 23 March 2021](#)

Appendix 8: Draft Minutes of Scrutiny & Overview Committee meeting – 23 March 2021

Item 11b: Response to the concerns of the Scrutiny and Overview Committee – Report dated 7 June. Includes considerations when deciding to implement an Experimental Traffic Order.

5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 5.1 For the financial and risk assessment considerations please see the accompanying report providing the response to the concerns of the Scrutiny & Overview Committee.

6 LEGAL CONSIDERATIONS

- 6.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that the Scrutiny and Overview Committee at its meeting considered this key decision and concluded that there were concerns about the decision and therefore referred the matter to Cabinet for reconsideration. It has set out the nature of the concerns. Cabinet should then reconsider the decision, amending the decision or not before making a final decision.
- 6.2 The decision shall be taken in accordance with the principles of natural justice in the decision-making process. The Cabinet are reminded that they must read all the papers that have been provided and that are relevant to the decision they are about to make. Failure to do so, (out of insufficient time or a belief that they are irrelevant,) would be a breach of their duty. It could also likely lead to a decision that is unlawful as it fails to take account of relevant considerations.
- 6.3 Cabinet shall have an open mind when considering this matter. Prior indications of a view on a matter do not amount to predetermination provided the decision maker has an open mind when considering the matter. This means that they take account of all information, including new information and reach their own conclusion, based on the evidence. It should be noted that Section 25(2) of the Localism Act 2011 states that a decision-maker is not to be taken to have had, or to have appeared to have had, a closed mind when making the decision just because—
- (a) the decision-maker had previously done anything that directly or indirectly indicated what view the decision-maker took, or would or might take, in relation to a matter, and
 - (b) the matter was relevant to the decision.
- 6.4 The outcome of Cabinet's decision must be objectively rational by ensuring it is evidence based. Cabinet must be able to show, objectively, that it has taken the all relevant information and material into account and reached its own conclusion based on the evidence. An irrational or unreasonable decision is one that was not reasonably open to it, (as stated by Lord Green MR in the *Associated Provincial Picture Houses v Wednesbury Corporation [1948] 1 KB 223*.) The courts have offered the following interpretation of "irrationality":

- "Unreasonableness can include anything which can objectively be adjudged to be unreasonable. It is not confined to culpability or callous indifference. It can include, where carried to excess, sentimentality, romanticism, bigotry, wild prejudice, caprice, fatuousness or excessive lack of common sense". (In *Re W (An Infant)* [1971] AC 682, Lord Hailsham (at 699H).)
- "a decision which does not add up". (In *R v Parliamentary Commissioner for Administration, ex parte Balchin* [1998] 1 PLR 1.
- "a decision which no sensible authority acting with due appreciation of its responsibilities would have decided to adopt". (In *Secretary of State for Education and Science v Tameside Metropolitan Borough Council* [1977] AC 1014, Lord Diplock (at 1064 E-F).)

6.5 The Cabinet should provide reasons for their decision. A well-reasoned decision will fully inform those affected by the decision of the reasons for the outcome. Well-reasoned decisions help public bodies withstand legal challenge by explaining their thought processes. Reasons do not need to be excessively detailed, but do need to be adequate, (see *R (Savva) v Royal Borough of Kensington and Chelsea* [2010] EWCA Civ 1209) Adequate reasons are reasons that:

- Deal with all the substantial points that have been raised.
- Are sufficient for the parties to know whether the decision-maker has made an error of law.
- Set out and explain key aspects of the decision-maker's reasoning in coming to its conclusion.
- Include all aspects of reasoning that were material to the decision.
- Do not need to set out in detail all the evidence and arguments referred to by the decision-maker.
- Decision-makers should record the reasons for their decisions at the time they are made.

Approved by, Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer.

7 HUMAN RESOURCES IMPACT

7.1 For the human resource impact please see the accompanying report providing the response to the concerns of the Scrutiny & Overview Committee.

Approved by: Jennifer Sankar, Head of HR Place on behalf of Sue Moorman, Director of HR

8 EQUALITIES IMPACT

8.1 For the equalities impact please see the accompanying report providing the response to the concerns of the Scrutiny & Overview Committee.

9 ENVIRONMENTAL IMPACT

9.1 For the environmental impact please see the accompanying report providing the response to the concerns of the Scrutiny & Overview Committee.

10 CRIME AND DISORDER REDUCTION IMPACT

10.1 For the crime and disorder impact please see the accompanying report providing the response to the concerns of the Scrutiny & Overview Committee.

11 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

11.1 The referral to Cabinet has been made by the Scrutiny & Overview Committee in line with the process set out in paragraph 11.9 in section 4E: Scrutiny & Overview Procedure Rules of the Council's Constitution. As set out in paragraph 11.9, the Cabinet need to reconsider the original decision in light of the concerns raised by the Committee.

11.2 The Cabinet can choose to either amend the decision in light of the concerns raised by the Scrutiny and Overview Committee or not. Having chosen whether or not to amend the decision, Cabinet needs to make the final decision.

12 OPTIONS CONSIDERED AND REJECTED

12.1 None

CONTACT OFFICER: Simon Trevaskis – Senior Democratic Services & Governance Officer - Scrutiny

APPENDICES:

Appendix 1: Traffic Management Advisory Committee, 12 January 2021, The Crystal Place and South Norwood Low Traffic Neighbourhood – Pages 29 to 370

Appendix 2: Minutes of the Traffic Management Advisory Committee – 12 January 2021

Appendix 3: Decision, 29 January 2021, Crystal Palace and South Norwood Low Traffic Neighbourhood

Appendix 4: Traffic Management Advisory Committee, 15 February 2021, Crystal Palace and South Norwood Low Traffic Addendum Report

Appendix 5: Minutes of the Traffic Management Advisory Committee – 15 February 2021

Appendix 6: Decision, 23 February 2021, Crystal Palace and South Norwood Low Traffic Neighbourhood

Appendix 7: Corporate Plan for Croydon 2018-2022

Appendix 8: Climate Change report

Appendix 9: Crystal Palace & South Norwood Low Traffic Neighbourhood Call-In Report, Scrutiny & Overview Committee – 23 March 2021

Appendix 10: Draft Minutes of Scrutiny & Overview Committee meeting – 23 March 2021

BACKGROUND DOCUMENTS: None

This page is intentionally left blank

The Crystal Palace and South Norwood Low Traffic Neighbourhood

Page 271

Ian Plowright
Head of Transport
Planning and Strategic
Transport
Place Department

Rachel Flowers
Director of Public Health
Public Health
Health Wellbeing and
Adults Department

12 January 2021



“Active travel is affordable, delivers significant health benefits, has been shown to improve well-being, mitigates congestion, improves air quality and has no carbon emissions at the point of use. Towns and cities based around active travel will have happier and healthier citizens as well as lasting local economic benefits. In July we published ‘Gear Change: A Bold vision for cycling and walking’, which set out a range of commitments to increase levels of active travel. Reallocating road space is very much part of that vision.

The government therefore expects local authorities to make significant changes to their road layouts to give more space to cyclists and pedestrians. Such changes will help embed altered behaviours and demonstrate the positive effects of active travel. I’m pleased to see that many authorities have already begun to do this, and I urge you all to consider how you can begin to make use of the tools in this guidance, to make sure you do what is necessary to ensure transport networks support recovery from the COVID-19 emergency and provide a lasting legacy of greener, safer transport”

Grant Shapps
Secretary of State for Transport, Forward to Statutory guidance on
Traffic Management Act 2004: Network Management in Response to COVID-19
(Updated 13 November 2020)

Roadworks and Closures



- **22nd March** - Scaffold / Temp signals implementation
- Auckland Road closed for SGN gas works
- **21st August** – Temporary LTN current state

Road/Section of Road Name	2. Closed between	3. TTRO start date	
Lancaster Road, South Norwood (fronting Nos. 2 to 8 Lancaster Road)	Southern Avenue, South Norwood	22/05/20	
Auckland Road (fronting property Nos. 70 to 110 Auckland Road), Upper Norwood	Cypress Road, Upper Norwood	03/07/20	
Fox Hill, Upper Norwood	Braybrooke Gardens, Upper Norwood	21/08/20	
Stambourne Way, Upper Norwood	Auckland Road, Upper Norwood	21/08/20	
Sylvan Hill, Upper Norwood	Between Nos. 11 & 13 Sylvan Hill, Upper Norwood	21/08/20	

- **1st November** - Scaffold / temp signal removal
- **1st – 3rd November** – SCOOT fault at Anerley and Church Road junction
- **10th November** – Temp signals on Anerley for Thames works (1 day only, very large delays)



Statutory and Strategy



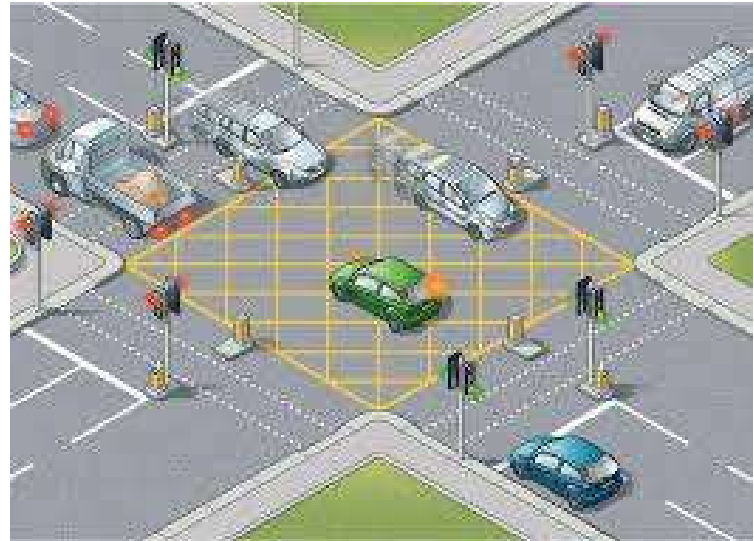
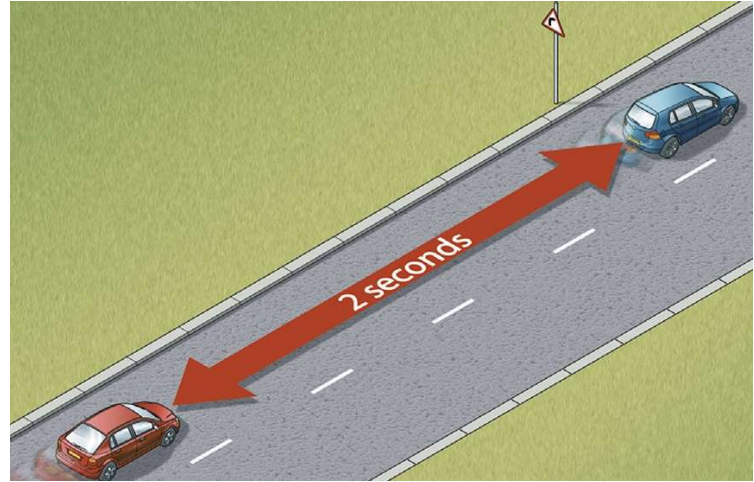
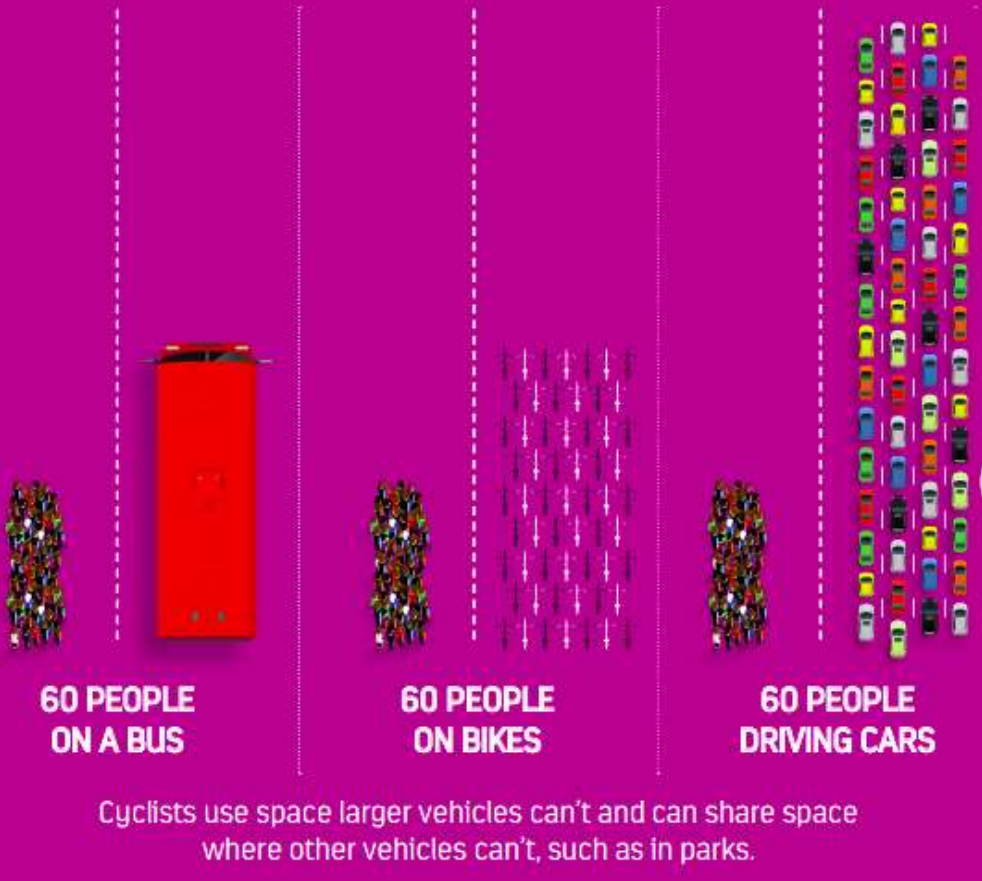
The Expeditious Movement of Traffic: A Win Win

'Mitigating congestion': Duty regarding the expeditious movement of traffic


'The overall aim of the "expeditious movement of traffic" implies a network that is working efficiently without unnecessary delay to those travelling on it. But the duty is also qualified in terms of practicability and other responsibilities of the authority. This means that the duty is placed alongside all the other things that an authority has to consider, and it does not take precedence..... But, the statutory duty reflects the importance placed on making best use of existing road space for the benefit of all road users.

Traffic Management Act 2004 Network Management Duty Guidance (2004)

A cyclist uses road space more efficiently than any other type of road user except a bus or tram




400,000+
the number of trips we
could make each day
by bicycle




Under 5km
the length of a typical
weekday car journey into
Croydon Town Centre and
a distance most people
could easily cycle



6,000
the number of daily
trips we actually cycle –
about 1% of the potential



300,000+
the number of car journeys made
by Croydonians, starting
or finishing in Croydon
each day, which TfL
estimates could be cycled
if conditions were suitable





March 2019

TABLE ST07 - Borough outcome indicator targets

Objective	Metric	Borough target	Target year	Additional commentary
Overarching mode share aim – changing the transport mix				
Londoners' trips to be on foot, by cycle or by public transport	Active, efficient and sustainable (walking, cycling and public transport) mode share (by borough resident) based on average daily trips. Base period 2013/14 - 2015/16 for Croydon = 49%	50%	2021	An increase of 1% sustainable mode share to 50% by 2021 is still very challenging as it is against a backdrop of falling mode share - in the 2012/13 to 2014/15 mode share was 52%
		63%	2041	
Healthy Streets and healthy people				
Outcome 1: London's streets will be healthy and more Londoners will travel actively				
Londoners to do at least the 20 minutes of active travel they need to stay healthy each day	Proportion of London residents doing at least 2x10 minutes of active travel a day (or a single block of 20 minutes or more). Croydon Baseline 2013/14-16/17= 26%	35%	2021	The interim target of 35% by 2021 is an increase of 10% points from the baseline in only 3 years. This is a very challenging. The long term target of 70% by 2041 means an increase of 44%
		70%	2041	

The Healthy Streets Approach & Healthy Streets Indicators

Healthy Streets Indicators: 10 evidence-based indicators of what makes streets appealing, healthy, inclusive places.

Working towards these will help to create a healthier city, in which all people are included and can live well, and where inequalities are reduced.



The 10 Indicators:

- ▶ Pedestrians from all walks of life
- ▶ Easy to cross
- ▶ Shade and shelter
- ▶ Places to stop and rest
- ▶ Not too noisy
- ▶ People choose to walk, cycle and use public transport
- ▶ People feel safe
- ▶ Things to see and do
- ▶ People feel relaxed
- ▶ Clean air

Source: 'Healthy Streets Explained' TfL

WEIGHT

WEIGHT

Overweight and obesity in Croydon

Weight is measured in children at school in reception (aged 4-5) and year 6 (aged 10-11). In Croydon, slightly more than one in five children (21.9%) aged 4-5 are overweight or obese. By the time they reach the ages of 10-11, this increases to just greater than one in three children (37.9%) (86).

The prevalence of overweight and obese children in Croydon overall is similar to the average across London. While reception year prevalence has remained fairly constant over time, the proportion of year 6 children measuring as overweight and obese is increasing. This is not just happening in Croydon, it is happening across England.

There is some variation across the borough, with high levels of excess weight being concentrated in the north of the borough in year 6 children but more spread out across the borough in reception year children (87).

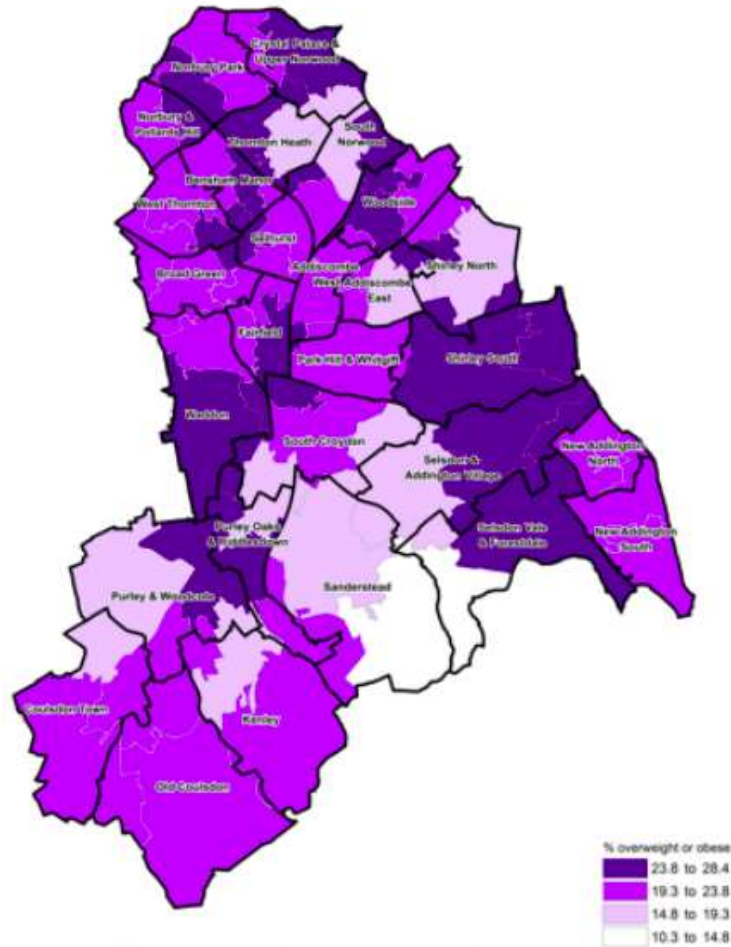


**1 IN 5 CHILDREN
IN RECEPTION YEAR IS
OVERWEIGHT OR OBESE**

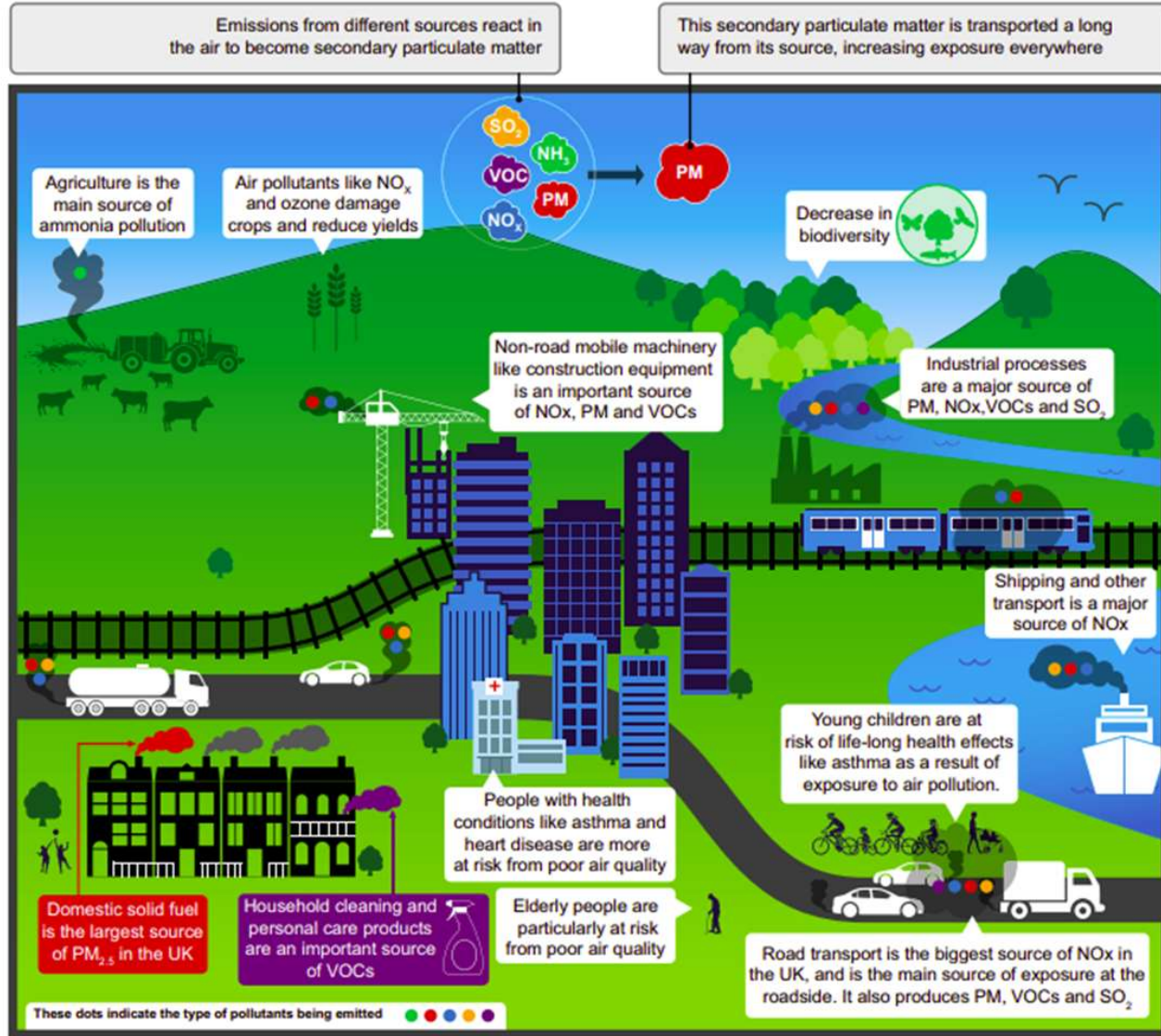


**1 IN 3 CHILDREN
IN YEAR 6 IS OVERWEIGHT OR OBESE**

Prevalence of overweight and obese reception age in Croydon.
NCMP small area data, 2015-2018



Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2019. OS Licence number 10001927





‘This unprecedented pandemic has also shown many of us, myself very much included, that we need to think harder about our health. We need to think harder about how we can make lifestyle changes that keep us more active and fit – the way we travel is central to this.’ Boris Johnson, Prime Minister

‘You can’t keep doing it the same way over and over again and expect different results’

Albert Einstein

Ian Plowright and Rachel Flowers

CROYDON
www.croydon.gov.uk

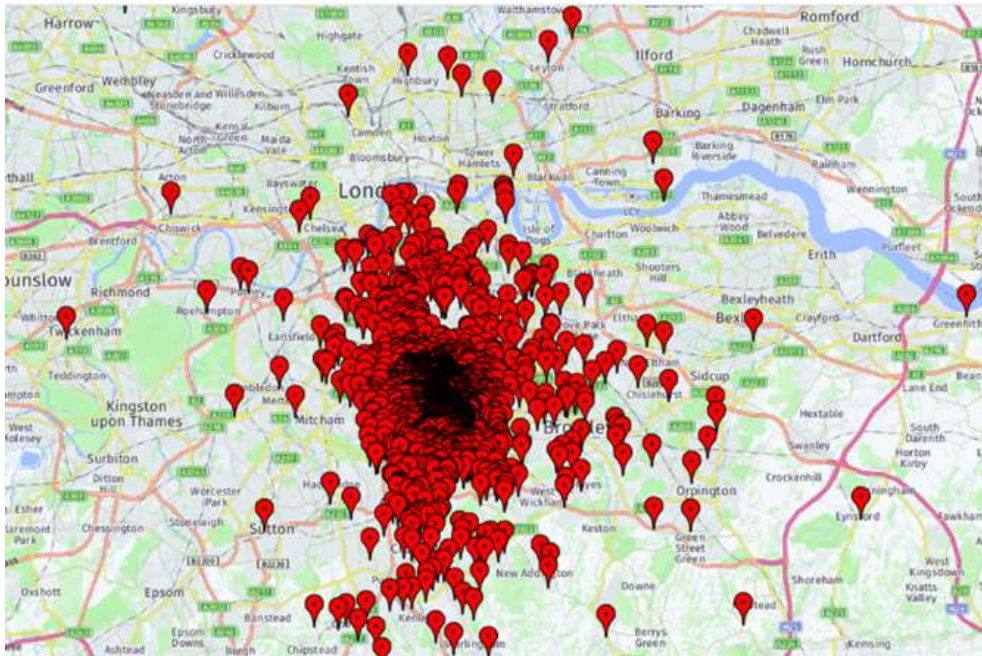


‘Very few changes to anything will command unanimous support, and we do not ask it for these schemes. But there is clear evidence that for all the controversy they can sometimes cause, ambitious cycling and walking schemes have significant, if quieter, majority support. In recent surveys by my Department, 65 per cent of people across England supported reallocating road space to walking and cycling in their local area and nearly eight out of ten people support measures to reduce road traffic in their neighbourhood. In individual neighbourhoods from which through traffic has been removed, surveys again find that clear majorities of residents welcome the schemes and want them to stay.’

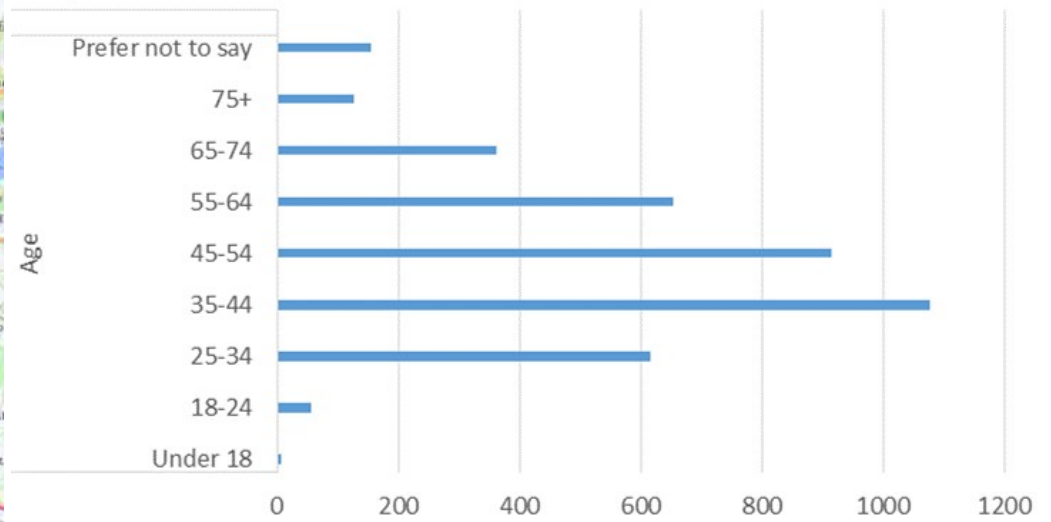
‘Councils must develop schemes that work for their communities. Consultation should include objective tests of public opinion, such as scientific polling, to cut through the noise and passion schemes can generate and gather a truly representative picture of local views. It should engage stakeholders, including local MPs, but it should not be confused with listening only to the loudest voices or giving any one group a veto.’

Grant Shapps

Active Travel Funding Tranche 2 Allocations letter to Sadiq Khan 13 November 2020



Age Profile of Responders



Recent submissions

Dear Committee Members and Councillors

My wife and I wish to indicate that we are broadly in agreement with the recommendation put forward in the report to the committee, though we have reservations about allowing resident access through the bus gate.

We want you to know that the LTN is working well and our own changed travel behaviour is an indication of this. Despite advancing years (144 years combined) we have dramatically responded to both the COVID crisis and the LTN implementation. We no longer use our Freedom Passes and walk to the triangle from near the bus gate to do our 'heavy' shopping. In the past 8 months we have only used our car twice for journeys under 5km, and they were to transport an even older and more vulnerable member of our bubble. It has been an eye-opener to experience the joys of walking in a beautiful and safe neighbourhood, and we have been struck by the increased number of people taking advantage of it. My wife has even tried cycling to Dulwich, something she would not have even contemplated without the protection provided by the LTN.

It may appear that your decision will be based on local criteria. But you are not doing this in isolation. All over London, all over England, even all over the world, democratic representatives are facing exactly the same conundrum in the face of almost identical arguments from supporters and opponents of these schemes. Nor is it isolated from the age in which we live. Climate change is the dominant issue that needs addressing and Croydon council is already taking complimentary steps to address this.

You have a very simple choice: do we go back to the past that everyone knows does not work or choose to tackle the problems we all know we have to face.

Thank you for serving the community.

(email from resident (living just south of the bus gate) to TMAC and local MPs, 9 Jan 2021)

Ian Plowright

The Recommendations

This page is intentionally left blank

CROYDON COUNCIL

DECISION NOTICE: Traffic Management Matters by Cabinet Member for Sustainable Croydon

1	TITLE	The Crystal Place and South Norwood Low Traffic Neighbourhood
2	DECISION REFERENCE NO.	N/A
3	KEY DECISION REFERENCE NO. (if applicable)	6520SC
4	SUMMARY	<p>In relation to the existing Crystal Palace and South Norwood Temporary Low Traffic Neighbourhood, the Cabinet Member for Sustainable Croydon has resolved to:</p> <ul style="list-style-type: none">Remove the measures implementing the existing Temporary Low Traffic Neighbourhood as soon as practicable and in any event prior to 12 February 2021; <p>In relation to the proposed Crystal Palace and South Norwood Experimental Low Traffic Neighbourhood, the Cabinet Member has been made aware of the judgment of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] EWHC 72 which quashed the London Streetspace Plan and Transport for London's "Interim Guidance to Boroughs" (albeit that the quashing order is stayed pending appeal by TfL). As a result, the Cabinet Member resolves to:</p> <ul style="list-style-type: none">In relation to the report to the Traffic Management Advisory Committee held on 12 January 2021 ("the January 2021 Report") - Request officers to prepare an addendum to the January 2021 Report addressing the judgment of Mrs Justice Lang and the impact, if any, on the recommendations in respect of the proposed experimental order which were made to the Traffic Management Advisory Committee in the January 2021 Report;Refer the addendum back to the Traffic Management Advisory Committee for consideration, with a decision to be taken by the Cabinet Member thereafter.
5	ANY CONFLICT OF INTEREST DECLARED BY AN EXECUTIVE MEMBER CONSULTED by the decision maker in making the decision (if any)	N/A

6	ANY DISPENSATION GRANTED BY THE CE TO THE EXECUTIVE MEMBER CONSULTED in 4 above (dispensation may only be granted by the Chief Executive) (if any)	N/A
7	ANY RELEVANT DECISION BY EXECUTIVE DIRECTOR OF PLACE PURSUANT TO THE LEADER'S DELEGATION OF 6 June 2016 (if any) [ATTACH AND SUMMARISE]	N/A
8	COPY OF MINUTES OF THE TRAFFIC MANAGEMENT ADVISORY COMMITTEE DETAILING REPRESENTATIONS MADE AT MEETING BY INTERESTED PARTIES TOGETHER WITH QUESTIONS ASKED BY AND OF COMMITTEE BOTH OF INTERESTED PARTIES AND OFFICERS (include here link to relevant webcast)	<p>Minutes of the Traffic Management Advisory Committee held on 12 January 2021 are attached for information.</p> <p>Webcast – https://webcasting.croydon.gov.uk/meetings/11439</p>
9	RECOMMENDATIONS WITH REASONS FROM TRAFFIC MANAGEMENT ADVISORY COMMITTEE	<p><u>Recommendations in the January 2021 Report</u></p> <p>That the Traffic Management Advisory Committee recommend to the Cabinet Member for Sustainable Croydon that they:</p> <p>1.1 Consider:</p> <ul style="list-style-type: none"> a) the responses received to the informal consultation on the options for the future of the Crystal Place and South Norwood Temporary Low Traffic Neighbourhood and other feedback. b) the Mayor of London's Transport Strategy and the Council's plan to implement it within the Borough (the Croydon Local Implementation Plan). c) the Council's statutory duties, including its duties under the Road Traffic Regulation Act 1984, in particular its duties under s.9, s.121B and s.122, its duties under the Traffic Management Act 2004, in particular its duty

		<p>under s.16, its duties under the Equality Act 2010, in particular under s.1 and s.149 (the public sector equality duty).</p> <ul style="list-style-type: none"> d) the statutory guidance 'Traffic Management Act 2004: network management in response to COVID-19' as updated on 13 November 2020. e) the other matters within and referred to within this report. <p>1.2 Agree to the removal of the measures implementing the Temporary Low Traffic Neighbourhood as soon as practicable and in any event prior to the implementation of the recommended Experimental TRO.</p> <p>1.3 Agree (subject to Spending Control Panel agreeing to the spending of ring fenced grant funding) to implement an Experimental Low Traffic Neighbourhood at Crystal Palace and South Norwood 'Experimental LTN' by the making of an Experimental Traffic Regulation Order (Experimental TRO) to operate for up to 18 months, to:</p> <p>1.3.1 prohibit access and egress by motor vehicles (other than certain exempt vehicles) at the following locations:</p> <ul style="list-style-type: none"> (a) Sylvan Hill at the common boundary of Nos.11 and 13 (b) Lancaster Road junction with Goat House Bridge (c) Fox Hill junction with Braybrooke Gardens (d) Stambourne Way junction with Auckland Road (e) Bus gate introduced at the common boundary of Nos. 86 and 84a(Auckland Road Surgery) Auckland Road <p>These restrictions to be enforced through Automatic Number Plate Recognition (ANPR) camera technology, shall not apply in respect of:</p> <ul style="list-style-type: none"> (a) a vehicle being used for fire brigade, ambulance or police purposes; (b) anything done with the permission of a police constable in uniform or a civil enforcement officer in uniform; (c) a vehicle being used for the purposes of a statutory undertaker in an emergency, such as the loss of supplies of gas, electricity or water to
--	--	--

		<p>premises in the area, which necessitates the bringing of vehicles into a section of road to which the order applies;</p> <p>(d) vehicles to which a valid exemption permit has been provided;</p> <p>(e) licensed taxis at the bus gate only.</p> <p>1.3.2 Introduce two disabled persons Blue Badge parking bays outside Nos. 84 and 86 Auckland Road.</p> <p>for the reasons set out in this report and summarised at paragraph 3.12 and 15.3 of the report.</p> <p>1.4. Delegate to the Director of Public Realm the authority to vary the provisions of the Experimental TRO including the exemptions to the restrictions.</p> <p>1.5 Instruct officers to continue to seek to work with those in Bromley Council to mitigate effects predicted to arise from the Experimental LTN in certain residential access streets in Bromley.</p> <p>1.6 In relation to Equality to agree:</p> <p>i) that the equality implications of the recommended Experimental Traffic Regulation Order have been the subject of careful consideration in compliance with the Council's obligations under sections 1 and 149 of the Equality Act 2010;</p> <p>ii) nevertheless there should be further equality impact analysis including through focused engagement with the members of groups with protected characteristics potentially most affected by the proposed change in and around the area of the current LTN during the operation and improvement of the Experimental TRO</p> <p>1.7 That a recommendation on the future for the Experimental LTN be brought to the Traffic Management Advisory Committee at the appropriate time.</p> <p><u>Key Points raised at Committee</u></p> <p>During the debate at the Traffic Management Advisory Committee, the following key points were raised:</p>
--	--	---

		<ul style="list-style-type: none"> • Response from local schools with regards to access by staff members • Access for care workers to assist those residents in need of home care, whether by professionals or family members • Access for residents using car clubs • Period of the experimental order • Engagement with the London Borough of Bromley <p><u>Endorsement of the Recommendations</u></p> <p>Councillors Luke Clancy, Michael Neal and Pat Ryan stated that they did not endorse the recommendations made to the Cabinet Member for Sustainable Croydon.</p> <p>Councillors Karen Jewitt and Paul Scott endorsed the recommendations made to the Cabinet Member for Sustainable Croydon; however, they both requested the length of the trial was reconsidered, to either six or twelve months.</p>
10	<p>BACKGROUND PAPERS: Include here specific reference to the report to the Traffic Management Advisory Committee which must be attached and should include:</p> <ul style="list-style-type: none"> • Relevant legislation • Equalities and human rights considerations • Legal comments • Appendices (list them) 	<p>Attached:</p> <p>Committee report & appendices Letter from Bromley Chief Executive Letter from Steve Reed MP Letter from Ellie Reeves MP</p>
11	<p>ANY OTHER RELEVANT FACTORS TO TAKE INTO ACCOUNT</p>	<p>Judgment in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] EWHC 72</p>

Pursuant to the delegation from the Leader dated 11 January 2021 and having due regard to:

- the above referenced information;
- the attachments;
- the Council's public sector equality duty;

- the comments and recommendations from the Traffic Management Advisory Committee;
- the contents of the report to the Traffic Management Advisory Committee and supporting appendices;
- the minutes of the Traffic Management Advisory Committee including details of representations received from officers, members of the public and other interested parties and any subsequent questions asked by the Traffic Management Advisory Committee (including viewing the webcast where necessary)

I hereby:

- agree to the recommendations in paragraphs 1.1-1.2 of section 9 above for the following reasons

Taking into account everything set out in the January 2021 Report including the consultation responses, criticisms levelled at the Temporary LTN and views of the Traffic Management Advisory Committee, I consider that the existing Crystal Palace and South Norwood Temporary Low Traffic Neighbourhood should be removed irrespective of the decision in respect of the Experimental Orders.

- request the following additional information to enable me to consider the recommendations in paragraphs 1.1 and 1.3 – 1.7 of section 9

An addendum to the January 2021 Report addressing the judgment of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] and the impact, if any, on the recommendations in respect of the proposed experimental order which were made to the Traffic Management Advisory Committee in the January 2021 Report.

- wish the following questions to be put to the Traffic Management Advisory Committee/ officers/ persons who made representations to the Committee/in response to the consultation to enable me to further consider the consider the recommendations in paragraphs 1.1 and 1.3 – 1.7 of section 9

Following preparation of the addendum to the January 2021 Report, does the Traffic Management Advisory Committee endorse the recommendations 1.1 and 1.3-1.7 of section 9, or such other recommendations in the addendum, in respect of the proposed experimental order.

- request the additional information and questions to be put to the Traffic Management Advisory Committee/ officers/ persons who made representations to the Committee/in response to the consultation to enable me to further consider the consider the recommendations in paragraphs 1.1 and 1.3 – 1.7 of section 9 for the following reasons:

Whilst, currently, I am minded to acknowledge that the recommended Experimental LTN addresses many of the concerns and criticisms levelled at the Temporary LTN, I now need the views of TMAC upon the judgment of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021], following receipt of which I will consider taking a decision in respect of this matter. During the debate at the Traffic Management Advisory Committee, the following key points were raised. The Cabinet Member for Sustainable Croydon has considered these, and has asked officers to investigate and address them as follows:

- **Response from local school and how we will work with them to resolve their concerns**

The two local schools have both expressed concern with regards access to their establishments by teachers and other staff. The team are to investigate how these concerns can be addressed to best effect for all concerned

- **Access for care workers**

The needs of our residents who require home care, be that via professionals or family members, must be considered so that they and their care givers are not disadvantaged by this scheme. Clarity needs to be given as to how the Council will deal with the essential needs of those affected.

- **Access for car clubs**

Car clubs do mean that there are less cars on our roads at any one time as households can rely on the use of such clubs almost entirely. Residents living within the zone that do not have access to their own car or rely from time to time on the use of car club alternatives should not be penalised for trying to reduce their reliance upon the ownership of a car or similar. The team is to investigate how car clubs can be incorporated into the operation of the zone in a similar way to Care Givers.

- **Period of experimental order**

It is acknowledged that the Committee did not want the Experimental TRO to last beyond 12 months, with a review at that stage.

- **Engagement with the London Borough of Bromley**

Officers to report to TMAC on a regular basis to allow for the updating of the committee as we work together with Bromley to progress the scheme.

Notwithstanding the above, since the meeting of TMAC I have been made aware of the judgment of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] EWHC 72 which has quashed the London Streetspace Plan and Transport for London's "Interim Guidance to Boroughs". Whilst I understand that the quashing order is stayed pending appeal by TfL, I consider it necessary to fully understand the impact of the judgment, if any, on the recommendations to the Traffic Management Advisory Committee, to take a decision in relation to the proposed Experimental Orders which will comprise the Low Traffic Neighbourhood.

- * delete as appropriate

The options I have considered and rejected in making this decision are the following:

The options considered and rejected are:

1. Leaving the Temporary LTN in place pending a decision on an experimental LTN.

.....
Print Name

Muhammad Ali

.....
Signature



.....
Title

Cabinet Member for Sustainable Croydon
.....

LONDON BOROUGH OF CROYDON

To: All Members of Council
Croydon Council website

PUBLIC NOTICE OF KEY DECISIONS MADE BY CABINET MEMBER FOR SUSTAINABLE CROYDON ON 23 FEBRUARY 2021

This statement is produced in accordance with Regulation 13 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

In accordance with the Scrutiny and Overview Procedure Rules, the following decisions may be implemented from **1300 hours on 3 March 2021** unless referred to the Scrutiny and Overview Committee (ie after 13.00 hours on the 6th working day following the day on which the decision was taken). The call-in procedure is appended to this notice.

The following apply to the decision below:

Reasons for these decisions: As set out in the Part A report.

Other options considered and rejected: As set out in the Part A report.

Details of conflicts of interest declared by the decision maker: None

Note of dispensation granted by the Head of Paid Service in relation to a declared conflict of interest by that decision maker: None

The Leader of the Council has delegated to the decision maker the power to make the Key Decisions noted out below:

Decision Title: CRYSTAL PALACE AND SOUTH NORWOOD LOW TRAFFIC NEIGHBOURHOOD

Key Decision No: 6520SC

Details of decision:

Having carefully read and considered the Part A report, and the requirements of the Council's public sector equality duty in relation to the issues detailed in the body of the reports, the Cabinet Member for Sustainable Croydon

RESOLVED to:

1. Subject to Spending Control Panel agreeing to the spending of ring fenced grant funding to implement an Experimental Low Traffic Neighbourhood at Crystal Palace and South Norwood 'Experimental LTN' by the making of an Experimental Traffic Regulation Order (Experimental TRO) to operate for up to 18 months, to:

- a. prohibit access and egress by motor vehicles (other than certain exempt vehicles) at the following locations:
 - i. Sylvan Hill at the common boundary of Nos.11 and 13
 - ii. Lancaster Road junction with Goat House Bridge
 - iii. Fox Hill junction with Braybrooke Gardens
 - iv. Stambourne Way junction with Auckland Road
 - v. Bus gate introduced at the common boundary of Nos. 86 and 84a (Auckland Road Surgery) Auckland Road
 - b. These restrictions to be enforced through Automatic Number Plate Recognition (ANPR) camera technology.
 - c. The restrictions shall not apply in respect of:
 - i. a vehicle being used for fire brigade, ambulance or police purposes;
 - ii. anything done with the permission of a police constable in uniform or a civil enforcement officer;
 - iii. a vehicle being used for the purposes of a statutory undertaker in an emergency, such as the loss of supplies of gas, electricity or water to premises in the area, which necessitates the bringing of vehicles into a section of road to which the order applies;
 - iv. buses;
 - v. licensed taxis
 - vi. Dial-a-Ride vehicles;
 - vii. vehicles to which a valid exemption permit has been provided.
 - d. Introduce two disabled persons Blue Badge parking bays outside Nos 84 and 86 Auckland Road.
2. Instruct officers to continue to seek to work with those in Bromley Council to mitigate effects predicted to arise from the Experimental LTN in certain residential access streets in Bromley and to address concerns about potential effects on air quality.
 3. Delegate to the Director of Public Realm the authority to vary the provisions of the Experimental TRO including the exemptions to the restrictions.
 4. In relation to Equality, agree:
 - a. that the equality implications of the recommended Experimental Traffic Regulation Order have been the subject of careful consideration in compliance with the Council's obligations under sections 1 and 149 of the Equality Act 2010;
 - b. nevertheless there should be further equality impact analysis including through focused engagement with the members of groups with protected characteristics potentially most affected by the proposed change in and around the area of the Experimental LTN during the operation and any change of the Experimental TRO;
 5. Ensure that a recommendation on the future for the Experimental LTN be brought to the Traffic Management Advisory Committee at the appropriate time if considered desirable prior to the expiry of the Experimental TRO and in

any event as soon as is practicable after 12 months of the experimental order being in place.

Signed: Council Solicitor and Monitoring Officer

Notice Date: 23 February 2021

Scrutiny Referral/Call-in Procedure

1. The decisions may be implemented **1300 hours on 3 March 2021** (the 6th working day following the day on which the decision was taken) unless referred to the Scrutiny and Overview Committee.
2. The Council Solicitor shall refer the matter to the Scrutiny and Overview Committee if so requested by:-
 - i) the Chair and Vice Chair of the Scrutiny and Overview Committee and 1 member of that Committee; or for education matters the Chair, Vice Chair and 1 member of that Committee; or
 - ii) 20% of Council Members (14)
3. The referral shall be made on the approved pro-forma (*attached*) which should be submitted electronically or on paper to Victoria Lower by the deadline stated in this notice. Verification of signatures may be by individual e-mail, fax or by post. A decision may only be subject to the referral process once.
4. The Call-In referral shall be completed giving:
 - i) The grounds for the referral
 - ii) The outcome desired
 - iii) Information required to assist the Scrutiny and Overview Committee to consider the referral
 - iv) The date and the signatures of the Councillors requesting the Call-In
5. The decision taker and the relevant Chief Officer(s) shall be notified of the referral who shall suspend implementation of the decision. The Chair of the Scrutiny & Overview Committee shall also be notified.
6. The referral shall be considered at the next scheduled meeting of the Scrutiny & Overview Committee unless, in view of the Council Solicitor, this would cause undue delay. In such cases the Council Solicitor will consult with the decision taker and the Chair of Scrutiny and Overview to agree a date for an additional meeting. The Scrutiny & Overview Committee may only decide to consider a maximum of 3 referrals at any one meeting.
7. At the Scrutiny & Overview Committee meeting the referral will be considered by the Committee which shall determine how much time the Committee will give to the call in and how the item will be dealt with including whether or not it wishes to review the decision. If having considered the decision there are still concerns about the decision then the Committee may refer it back to Cabinet for reconsideration, setting out in writing the nature of the concerns. The Cabinet shall then reconsider the decision, amending the decision or not, before making a final decision.
8. The Scrutiny and Overview Committee may refer the decision to the Council if it considers that the decision is outside of the budget and policy framework of the Council. In such circumstances, the provisions of Rule 7 of the Budget & Policy Framework Procedure Rules (Part 4C of the Constitution) apply. The Council

may decide to take no further action in which case the decision may be implemented. If the Council objects to Cabinet's decision it can nullify the decision if it is outside the Policy Framework and/or inconsistent with the Budget.

9. If the Scrutiny and Overview Committee decides that no further action is necessary then the decision may be implemented.
10. If the Council determines that the decision was within the policy framework and consistent with the budget, the Council will refer any decision to which it objects together with its views on the decision, to the Cabinet. The Cabinet shall choose whether to either amend, withdraw or implement the original decision within 10 working days or at the next meeting of the Cabinet of the referral from the Council.
11. The responses of the decision-taker and the Council shall be notified to all Members of the Scrutiny and Overview Committee once the Cabinet or Council has considered the matter and made a determination.
12. If either the Council or the Scrutiny and Overview Committee fails to meet in accordance with the Council calendar or in accordance with paragraph 6 above, then the decision may be implemented on the next working day after the meeting was scheduled or arranged to take place.
13. **URGENCY:** The referral procedure shall not apply in respect of urgent decisions. A decision will be urgent if any delay likely to be caused by the referral process would seriously prejudice the Council's or the public's interests. The record of the decision and the notice by which it is made public shall state if the decision is urgent and therefore not subject to the referral process. The Chair of the Scrutiny and Overview Committee must agree that the decision proposed cannot be reasonably deferred and that it is urgent. In the absence of the Chair, the Deputy Chair's consent shall be required. In the absence of both the Chair and Deputy Chair, the Mayor's consent shall be required. Any such urgent decisions must be reported at least annually in a report to Council from the Leader including the reasons for urgency.

Signed: Council Solicitor and Monitoring Officer

Notice Date: 23 February 2021

Contact Officers: victoria.lower@croydon.gov.uk and cliona.may@croydon.gov.uk

PROFORMA

**REFERRAL OF A KEY DECISION TO THE
SCRUTINY AND OVERVIEW COMMITTEE**

For the attention of: Victoria Lower and Cliona May, Democratic Services & Scrutiny
e-mail to

Victoria.lower@croydon.gov.uk and cliona.may@croydon.gov.uk

Meeting:
Meeting Date:
Agenda Item No:

Reasons for referral:

- i) The decision is outside of the Policy Framework
- ii) The decision is inconsistent with the budget
- iii) The decision is inconsistent with another Council Policy
- iv) Other: Please specify:

The outcome desired:

**Information required to assist the Scrutiny and Overview Committee to consider
the referral:**

Signed:

Date:

Member of _____ Committee

CROYDON COUNCIL

DECISION NOTICE: Traffic Management Matters by Cabinet Member for Sustainable Croydon

1	TITLE	The Crystal Place and South Norwood Low Traffic Neighbourhood – Experimental Order following Addendum Report
2	DECISION REFERENCE NO.	N/A
3	KEY DECISION REFERENCE NO. (if applicable)	6520SC
4	SUMMARY	<p>The Cabinet Member for Sustainable Croydon has resolved:</p> <ol style="list-style-type: none">1. Subject to Spending Control Panel agreeing to the spending of ring fenced grant funding to implement an Experimental Low Traffic Neighbourhood at Crystal Palace and South Norwood ‘Experimental LTN’ by the making of an Experimental Traffic Regulation Order (Experimental TRO) to operate for up to 18 months, to:<ol style="list-style-type: none">a. prohibit access and egress by motor vehicles (other than certain exempt vehicles) at the following locations:<ol style="list-style-type: none">i. Sylvan Hill at the common boundary of Nos.11 and 13ii. Lancaster Road junction with Goat House Bridgeiii. Fox Hill junction with Braybrooke Gardensiv. Stambourne Way junction with Auckland Roadv. Bus gate introduced at the common boundary of Nos. 86 and 84a (Auckland Road Surgery) Auckland Roadb. These restrictions to be enforced through Automatic Number Plate Recognition (ANPR) camera technology.c. The restrictions shall not apply in respect of:<ol style="list-style-type: none">i. a vehicle being used for fire brigade, ambulance or police purposes;ii. anything done with the permission of a police constable in uniform or a civil enforcement officer;iii. a vehicle being used for the purposes of a statutory undertaker in an

		<p>emergency, such as the loss of supplies of gas, electricity or water to premises in the area, which necessitates the bringing of vehicles into a section of road to which the order applies;</p> <ul style="list-style-type: none"> iv. buses; v. licensed taxis vi. Dial-a-Ride vehicles; vii. vehicles to which a valid exemption permit has been provided. <p>d. Introduce two disabled persons Blue Badge parking bays outside Nos 84 and 86 Auckland Road.</p> <p>2. Instruct officers to continue to seek to work with those in Bromley Council to mitigate effects predicted to arise from the Experimental LTN in certain residential access streets in Bromley and to address concerns about potential effects on air quality.</p> <p>3. Delegate to the Director of Public Realm the authority to vary the provisions of the Experimental TRO including the exemptions to the restrictions.</p> <p>4. In relation to Equality, agree:</p> <ul style="list-style-type: none"> a. that the equality implications of the recommended Experimental Traffic Regulation Order have been the subject of careful consideration in compliance with the Council's obligations under sections 1 and 149 of the Equality Act 2010; b. nevertheless there should be further equality impact analysis including through focused engagement with the members of groups with protected characteristics potentially most affected by the proposed change in and around the area of the Experimental LTN during the operation and any change of the Experimental TRO; <p>5. Ensure that a recommendation on the future for the Experimental LTN be brought to the Traffic Management Advisory Committee at the appropriate time if considered desirable prior to the expiry of the Experimental TRO and in any event as soon as is practicable after 12 months of the experimental order being in place.</p>
--	--	---

5	ANY CONFLICT OF INTEREST DECLARED BY AN EXECUTIVE MEMBER CONSULTED by the decision maker in making the decision (if any)	N/A
6	ANY DISPENSATION GRANTED BY THE CE TO THE EXECUTIVE MEMBER CONSULTED in 4 above (dispensation may only be granted by the Chief Executive) (if any)	N/A
7	ANY RELEVANT DECISION BY EXECUTIVE DIRECTOR OF PLACE PURSUANT TO THE LEADER'S DELEGATION OF 6 June 2016 (if any) [ATTACH AND SUMMARISE]	N/A
8	COPY OF MINUTES OF THE TRAFFIC MANAGEMENT ADVISORY COMMITTEE DETAILING REPRESENTATIONS MADE AT MEETING BY INTERESTED PARTIES TOGETHER WITH QUESTIONS ASKED BY AND OF COMMITTEE BOTH OF INTERESTED PARTIES AND OFFICERS (include here link to relevant webcast)	<p>Minutes of the Traffic Management Advisory Committee held on 15 February 2021 are attached for information.</p> <p>Webcast – https://webcasting.croydon.gov.uk/meetings/11732</p>
9	RECOMMENDATIONS WITH REASONS FROM TRAFFIC MANAGEMENT ADVISORY COMMITTEE	<p><u>Recommendations in the Report to the Traffic Management Committee held on 12 January 2021 (the 'January 2021 Report')</u></p> <p>That the Traffic Management Advisory Committee recommend to the Cabinet Member for Sustainable Croydon that they:</p> <p>1.1 Consider:</p> <p>a) the responses received to the informal consultation on the options for the future of the Crystal Place and South Norwood Temporary Low Traffic Neighbourhood and other feedback.</p>

		<ul style="list-style-type: none"> b) the Mayor of London’s Transport Strategy and the Council’s plan to implement it within the Borough (the Croydon Local Implementation Plan). c) the Council’s statutory duties, including its duties under the Road Traffic Regulation Act 1984, in particular its duties under s.9, s.121B and s.122, its duties under the Traffic Management Act 2004, in particular its duty under s.16, its duties under the Equality Act 2010, in particular under s.1 and s.149 (the public sector equality duty). d) the statutory guidance ‘Traffic Management Act 2004: network management in response to COVID-19’ as updated on 13 November 2020. e) the other matters within and referred to within this report. <p>1.2 Agree to the removal of the measures implementing the Temporary Low Traffic Neighbourhood as soon as practicable and in any event prior to the implementation of the recommended Experimental TRO.</p> <p>1.3 Agree (subject to Spending Control Panel agreeing to the spending of ring fenced grant funding) to implement an Experimental Low Traffic Neighbourhood at Crystal Palace and South Norwood ‘Experimental LTN’ by the making of an Experimental Traffic Regulation Order (Experimental TRO) to operate for up to 18 months, to:</p> <p>1.3.1 prohibit access and egress by motor vehicles (other than certain exempt vehicles) at the following locations:</p> <ul style="list-style-type: none"> (a) Sylvan Hill at the common boundary of Nos.11 and 13 (b) Lancaster Road junction with Goat House Bridge (c) Fox Hill junction with Braybrooke Gardens (d) Stambourne Way junction with Auckland Road (e) Bus gate introduced at the common boundary of Nos. 86 and 84a (Auckland Road Surgery) Auckland Road <p>These restrictions to be enforced through Automatic Number Plate Recognition (ANPR) camera technology, shall not apply in respect of:</p>
--	--	---

		<ul style="list-style-type: none"> (a) a vehicle being used for fire brigade, ambulance or police purposes; (b) anything done with the permission of a police constable in uniform or a civil enforcement officer; (c) a vehicle being used for the purposes of a statutory undertaker in an emergency, such as the loss of supplies of gas, electricity or water to premises in the area, which necessitates the bringing of vehicles into a section of road to which the order applies; (d) vehicles to which a valid exemption permit has been provided; (e) licensed taxis at the bus gate only. <p>1.3.2 Introduce two disabled persons Blue Badge parking bays outside Nos. 84 and 86 Auckland Road.</p> <p>for the reasons set out in this report and summarised at paragraph 3.12 and 15.3 of the report.</p> <p>1.4. Delegate to the Director of Public Realm the authority to vary the provisions of the Experimental TRO including the exemptions to the restrictions.</p> <p>1.5 Instruct officers to continue to seek to work with those in Bromley Council to mitigate effects predicted to arise from the Experimental LTN in certain residential access streets in Bromley.</p> <p>1.6 In relation to Equality to agree:</p> <ul style="list-style-type: none"> i) that the equality implications of the recommended Experimental Traffic Regulation Order have been the subject of careful consideration in compliance with the Council's obligations under sections 1 and 149 of the Equality Act 2010; ii) nevertheless there should be further equality impact analysis including through focused engagement with the members of groups with protected characteristics potentially most affected by the proposed change in and around the area of the current LTN during the operation and improvement of the Experimental TRO <p>1.7 That a recommendation on the future for the Experimental LTN be brought to the Traffic</p>
--	--	---

Management Advisory Committee at the appropriate time.

Key Points raised at Committee on 12 January 2021

During the debate at the Traffic Management Advisory Committee, the following key points were raised:

- Response from local schools with regards to access by staff members
- Access for care workers to assist those residents in need of home care, whether by professionals or family members
- Access for residents using car clubs
- Period of the experimental order
- Engagement with the London Borough of Bromley Council

Recommendations in the Addendum to the January 2021 Report

The recommendations made to the Traffic Management Advisory Committee in the January 2021 report are maintained subject to the following changes:

Having considered the revised Equality Analysis, the Traffic Management Advisory Committee recommend to the Cabinet Member for Sustainable Croydon that:

2.1. The categories of vehicle to which Automatic Number Plate Recognition (ANPR) camera technology (Recommendation 1.3.1 in the January 2021 Report), shall not apply is extended to include:

- (a) a vehicle being used for fire brigade, ambulance or police purposes;
- (b) anything done with the permission of a police constable in uniform or a civil enforcement officer;
- (c) a vehicle being used for the purposes of a statutory undertaker in an emergency, such as the loss of supplies of gas, electricity or water to premises in the area, which necessitates the bringing of vehicles into a section of road to which the order applies;
- (d) buses;
- (e) licensed taxis
- (f) Dial-a-Ride vehicles;
- (g) vehicles to which a valid exemption permit has been provided.

for the reasons set out in the report and summarised at paragraph 3.12 and 15.3 of the January 2021 Report.

		<p>2.2. The Cabinet Member consider the revised Equality Analysis when making their decision in relation to recommendations 1.1 and 1.3 - 1.7 in the January 2021 Report.</p> <p><u>Key issues raised at Committee on 15 February 2021</u></p> <p>During the debate at the Traffic Management Advisory Committee, the following key points were raised:</p> <ul style="list-style-type: none"> - Timetable for recommendations and whether the introduction of the LTN should take place following the further ruling in the TfL case; - Access for those with disabilities but without a blue badge; - Access for delivery vehicles; - Response from the London Borough of Bromley Council whose position remains the same and the need for continuing engagement; - Dialogue with local schools. <p><u>Endorsement of the Recommendations</u></p> <p>Councillors Michael Neal and Luke Clancy stated that they did not endorse the recommendations made to the Cabinet Member for Sustainable Croydon.</p> <p>Councillors Robert Canning, Karen Jewitt and Paul Scott endorsed the recommendations made to the Cabinet Member for Sustainable Croydon.</p>
10	<p>BACKGROUND PAPERS: Include here specific reference to the report to the Traffic Management Advisory Committee which must be attached and should include:</p> <ul style="list-style-type: none"> • Relevant legislation • Equalities and human rights considerations • Legal comments • Appendices (list them) 	<p>Attached:</p> <ul style="list-style-type: none"> • January 2021 Report & appendices • Addendum to the January 2021 Report • Letter from Bromley Chief Executive • Letter from Steve Reed MP • Letter from Ellie Reeves MP • The Executive Decision notice published on 4 February 2021, in regards to the decision taken by the Cabinet Member for Sustainable Croydon to remove the measures implementing the Temporary Low Traffic Neighbourhood and to request further information to be reported to TMAC on 15 February 2021.

11	ANY OTHER RELEVANT FACTORS TO TAKE INTO ACCOUNT	N/A
----	---	-----

Pursuant to the delegation from the Leader dated 11 January 2021 and having due regard to:

- the above referenced information;
- the attachments;
- the Council's public sector equality duty and having specifically considered the revised Equality Analysis;
- the comments and recommendations from the Traffic Management Advisory Committee;
- the contents of the January 2021 Report and supporting appendices;
- the contents of the Addendum to the January 2021 Report
- the minutes of the Traffic Management Advisory Committee on 12 January 2021 and 15 February 2021 including details of representations received from officers, members of the public and other interested parties and any subsequent questions asked by the traffic Management Advisory Committee (including viewing the webcast where necessary)

I hereby:

Agree to the recommendations in paragraphs 1.1 – 1.7 of section 9 above as amended by the recommendations made in the Addendum to the January 2021 Report identified at 2.1 – 2.2 of Section 9 above for the following reasons

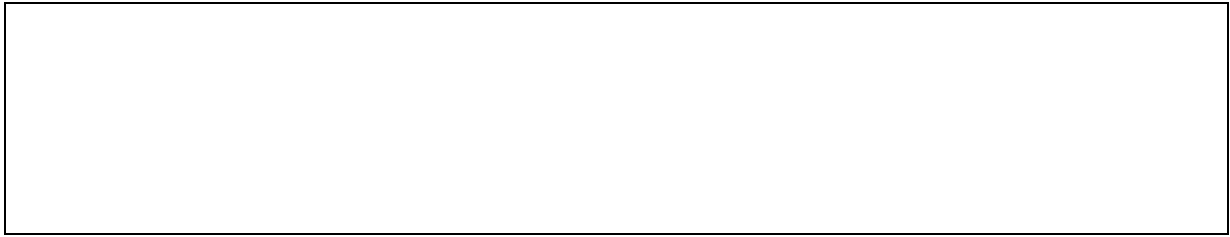
I agree that the recommended Experimental LTN addresses many of the concerns and criticisms levelled at the Temporary LTN. It particularly takes into account the revised Equality Analysis and addresses exemptions required for buses; licensed taxis and Dial-a-Ride vehicles and extends the eligibility for permits to:

- *Vehicles of staff employed at Cypress School and Harris Academy Crystal Palace;*
 - *Vehicles used by care givers of sick and/or disabled residents within the area of the LTN;*
 - *Vehicles registered by Blue Badge holders;*
- without unduly compromising air quality and climate change policy objectives.*

The options I have considered and rejected in making this decision are the following:

The options considered and rejected are:

- 1) Not implementing an LTN
- 2) Implementing a Permanent LTN
- 3) Awaiting the outcome of the TfL appeal before taking a decision on an LTN.



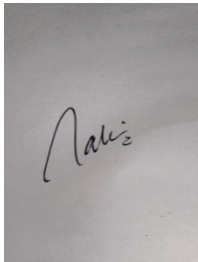
.....

Print Name

Councillor MUHAMMAD ALI

.....

Signature



.....

Title

Cabinet Member for Sustainable Croydon

.....

LONDON BOROUGH OF CROYDON

To: All Member of Council
Croydon Council website

STATEMENT OF EXECUTIVE DECISIONS MADE BY CABINET MEMBER FOR SUSTAINABLE CROYDON ON 27 JANUARY 2021

This statement is produced in accordance with Regulation 13 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012. Further to the associated public notice of Key Decisions no scrutiny call-in has been received, and therefore the following decisions can be implemented.

The following apply to the decisions listed below:

Reasons for these decisions: As set out in the Part A report.

Other options considered and rejected: As set out in the Part A report.

Details of Conflicts of Interest declared by the Decision Maker:

None

Note of dispensation granted by the head of paid service in relation to a declared conflict of interest by that Decision Maker:

None

The Leader of the Council has delegated to the Cabinet Member for Sustainable Croydon the power to make the Key Decisions set out below:

Key Decision no.: 6520SC

Decision Title: CRYSTAL PALACE AND SOUTH NORWOOD LOW TRAFFIC NEIGHBOURHOOD

Details of decision:

Having carefully read and considered the Part A report, in the signed decision notice attached and the requirements of the Council's public sector duty in relation to the issues detailed in the body of the reports, the Cabinet Member for Sustainable Croydon

RESOLVED:

1.1 To consider:

- a) the responses received to the informal consultation on the options for the future of the Crystal Place and South Norwood Temporary Low Traffic Neighbourhood and other feedback.
- b) the Mayor of London's Transport Strategy and the Council's plan to implement it within the Borough (the Croydon Local Implementation Plan).

- c) the Council's statutory duties, including its duties under the Road Traffic Regulation Act 1984, in particular its duties under s.9, s.121B and s.122, its duties under the Traffic Management Act 2004, in particular its duty under s.16, its duties under the Equality Act 2010, in particular under s.1 and s.149 (the public sector equality duty). .
 - d) the statutory guidance 'Traffic Management Act 2004: network management in response to COVID-19' as updated on 13 November 2020.
 - e) the other matters within and referred to within this report.
- 1.2 To agree to the removal of the measures implementing the Temporary Low Traffic Neighbourhood as soon as practicable and in any event prior to the implementation of the recommended Experimental TRO.
- 1.3 To request the following additional information to enable consideration of the recommendations 1.1 and 1.3 – 1.7 of the January 2021 report
- a) An addendum to the January 2021 report addressing the judgement of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] and the impact, if any, on the recommendations in respect of the proposed experimental order which were made to the Traffic Management Advisory Committee in the January 2021 report.
- 1.4 To request the following question be put to the Traffic Management Advisory Committee/officers/persons who made representations to the Committee/in response to the consultation to facilitate further consideration of the recommendations in paragraph 1.1 and 1.3 – 1.7 of the January 2021 report
- a) Following the preparation of the addendum to the January 2021 report, does the Traffic Management Advisory Committee endorse the recommendations 1.1 and 1.3 – 1.7 of the January 2021 report, or such other recommendation in the addendum, in respect of the proposed experimental order.
- 1.5 To request the additional information and questions be put to the Traffic Management Advisory Committee/officers/persons who made representations to the Committee/in response to the consultation to enable further consideration of the recommendations at 1.1 and 1.3 – 1.7 of the January 2021 report.
- a) **Response from local school and how we will work with them to resolve their concerns**
The two local schools have both expressed concern with regards access to their establishments by teachers and other staff. The team are to investigate how these concerns can be addressed to best effect for all concerned
 - b) **Access for care workers**
The needs of our residents who require home care, be that via professionals or family members, must be considered so that they and their care givers are not disadvantaged by this scheme. Clarity needs

to be given as to how the Council will deal with the essential needs of those affected.

c) Access for car clubs

Car clubs do mean that there are less cars on our roads at any one time as households can rely on the use of such clubs almost entirely. Residents living within the zone that do not have access to their own car or rely from time to time on the use of car club alternatives should not be penalised for trying to reduce their reliance upon the ownership of a car or similar. The team is to investigate how car clubs can be incorporated into the operation of the zone in a similar way to Care Givers.

d) Period of experimental order

It is acknowledged that the Committee did not want the Experimental TRO to last beyond 12 months, with a review at that stage.

e) Engagement with the London Borough of Bromley

Officers to report to TMAC on a regular basis to allow for the updating of the committee as we work together with Bromley to progress the scheme. Notwithstanding the above, since the meeting of TMAC I have been made aware of the judgment of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] EWHC 72 which has quashed the London Streetspace Plan and Transport for London's "Interim Guidance to Boroughs". Whilst I understand that the quashing order is stayed pending appeal by TfL, I consider it necessary to fully understand the impact of the judgment, if any, on the recommendations to the Traffic Management Advisory Committee, to take a decision in relation to the proposed Experimental Orders which will comprise the Low Traffic Neighbourhood.

Signed: Council Solicitor and Monitoring Officer

Notice date: 04 February 2021

CROYDON COUNCIL

DECISION NOTICE: Traffic Management Matters by Cabinet Member for Sustainable Croydon

1	TITLE	The Crystal Place and South Norwood Low Traffic Neighbourhood
2	DECISION REFERENCE NO.	N/A
3	KEY DECISION REFERENCE NO. (if applicable)	6520SC
4	SUMMARY	<p>In relation to the existing Crystal Palace and South Norwood Temporary Low Traffic Neighbourhood, the Cabinet Member for Sustainable Croydon has resolved to:</p> <ul style="list-style-type: none">Remove the measures implementing the existing Temporary Low Traffic Neighbourhood as soon as practicable and in any event prior to 12 February 2021; <p>In relation to the proposed Crystal Palace and South Norwood Experimental Low Traffic Neighbourhood, the Cabinet Member has been made aware of the judgment of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] EWHC 72 which quashed the London Streetspace Plan and Transport for London's "Interim Guidance to Boroughs" (albeit that the quashing order is stayed pending appeal by TfL). As a result, the Cabinet Member resolves to:</p> <ul style="list-style-type: none">In relation to the report to the Traffic Management Advisory Committee held on 12 January 2021 ("the January 2021 Report") - Request officers to prepare an addendum to the January 2021 Report addressing the judgment of Mrs Justice Lang and the impact, if any, on the recommendations in respect of the proposed experimental order which were made to the Traffic Management Advisory Committee in the January 2021 Report;Refer the addendum back to the Traffic Management Advisory Committee for consideration, with a decision to be taken by the Cabinet Member thereafter.
5	ANY CONFLICT OF INTEREST DECLARED BY AN EXECUTIVE MEMBER CONSULTED by the decision maker in making the decision (if any)	N/A

6	ANY DISPENSATION GRANTED BY THE CE TO THE EXECUTIVE MEMBER CONSULTED in 4 above (dispensation may only be granted by the Chief Executive) (if any)	N/A
7	ANY RELEVANT DECISION BY EXECUTIVE DIRECTOR OF PLACE PURSUANT TO THE LEADER'S DELEGATION OF 6 June 2016 (if any) [ATTACH AND SUMMARISE]	N/A
8	COPY OF MINUTES OF THE TRAFFIC MANAGEMENT ADVISORY COMMITTEE DETAILING REPRESENTATIONS MADE AT MEETING BY INTERESTED PARTIES TOGETHER WITH QUESTIONS ASKED BY AND OF COMMITTEE BOTH OF INTERESTED PARTIES AND OFFICERS (include here link to relevant webcast)	<p>Minutes of the Traffic Management Advisory Committee held on 12 January 2021 are attached for information.</p> <p>Webcast – https://webcasting.croydon.gov.uk/meetings/11439</p>
9	RECOMMENDATIONS WITH REASONS FROM TRAFFIC MANAGEMENT ADVISORY COMMITTEE	<p><u>Recommendations in the January 2021 Report</u></p> <p>That the Traffic Management Advisory Committee recommend to the Cabinet Member for Sustainable Croydon that they:</p> <p>1.1 Consider:</p> <ul style="list-style-type: none"> a) the responses received to the informal consultation on the options for the future of the Crystal Place and South Norwood Temporary Low Traffic Neighbourhood and other feedback. b) the Mayor of London's Transport Strategy and the Council's plan to implement it within the Borough (the Croydon Local Implementation Plan). c) the Council's statutory duties, including its duties under the Road Traffic Regulation Act 1984, in particular its duties under s.9, s.121B and s.122, its duties under the Traffic Management Act 2004, in particular its duty

		<p>under s.16, its duties under the Equality Act 2010, in particular under s.1 and s.149 (the public sector equality duty).</p> <ul style="list-style-type: none"> d) the statutory guidance 'Traffic Management Act 2004: network management in response to COVID-19' as updated on 13 November 2020. e) the other matters within and referred to within this report. <p>1.2 Agree to the removal of the measures implementing the Temporary Low Traffic Neighbourhood as soon as practicable and in any event prior to the implementation of the recommended Experimental TRO.</p> <p>1.3 Agree (subject to Spending Control Panel agreeing to the spending of ring fenced grant funding) to implement an Experimental Low Traffic Neighbourhood at Crystal Palace and South Norwood 'Experimental LTN' by the making of an Experimental Traffic Regulation Order (Experimental TRO) to operate for up to 18 months, to:</p> <p>1.3.1 prohibit access and egress by motor vehicles (other than certain exempt vehicles) at the following locations:</p> <ul style="list-style-type: none"> (a) Sylvan Hill at the common boundary of Nos.11 and 13 (b) Lancaster Road junction with Goat House Bridge (c) Fox Hill junction with Braybrooke Gardens (d) Stambourne Way junction with Auckland Road (e) Bus gate introduced at the common boundary of Nos. 86 and 84a(Auckland Road Surgery) Auckland Road <p>These restrictions to be enforced through Automatic Number Plate Recognition (ANPR) camera technology, shall not apply in respect of:</p> <ul style="list-style-type: none"> (a) a vehicle being used for fire brigade, ambulance or police purposes; (b) anything done with the permission of a police constable in uniform or a civil enforcement officer in uniform; (c) a vehicle being used for the purposes of a statutory undertaker in an emergency, such as the loss of supplies of gas, electricity or water to
--	--	--

		<p>premises in the area, which necessitates the bringing of vehicles into a section of road to which the order applies;</p> <p>(d) vehicles to which a valid exemption permit has been provided;</p> <p>(e) licensed taxis at the bus gate only.</p> <p>1.3.2 Introduce two disabled persons Blue Badge parking bays outside Nos. 84 and 86 Auckland Road.</p> <p>for the reasons set out in this report and summarised at paragraph 3.12 and 15.3 of the report.</p> <p>1.4. Delegate to the Director of Public Realm the authority to vary the provisions of the Experimental TRO including the exemptions to the restrictions.</p> <p>1.5 Instruct officers to continue to seek to work with those in Bromley Council to mitigate effects predicted to arise from the Experimental LTN in certain residential access streets in Bromley.</p> <p>1.6 In relation to Equality to agree:</p> <p>i) that the equality implications of the recommended Experimental Traffic Regulation Order have been the subject of careful consideration in compliance with the Council's obligations under sections 1 and 149 of the Equality Act 2010;</p> <p>ii) nevertheless there should be further equality impact analysis including through focused engagement with the members of groups with protected characteristics potentially most affected by the proposed change in and around the area of the current LTN during the operation and improvement of the Experimental TRO</p> <p>1.7 That a recommendation on the future for the Experimental LTN be brought to the Traffic Management Advisory Committee at the appropriate time.</p> <p><u>Key Points raised at Committee</u></p> <p>During the debate at the Traffic Management Advisory Committee, the following key points were raised:</p>
--	--	---

		<ul style="list-style-type: none"> • Response from local schools with regards to access by staff members • Access for care workers to assist those residents in need of home care, whether by professionals or family members • Access for residents using car clubs • Period of the experimental order • Engagement with the London Borough of Bromley <p><u>Endorsement of the Recommendations</u></p> <p>Councillors Luke Clancy, Michael Neal and Pat Ryan stated that they did not endorse the recommendations made to the Cabinet Member for Sustainable Croydon.</p> <p>Councillors Karen Jewitt and Paul Scott endorsed the recommendations made to the Cabinet Member for Sustainable Croydon; however, they both requested the length of the trial was reconsidered, to either six or twelve months.</p>
10	<p>BACKGROUND PAPERS: Include here specific reference to the report to the Traffic Management Advisory Committee which must be attached and should include:</p> <ul style="list-style-type: none"> • Relevant legislation • Equalities and human rights considerations • Legal comments • Appendices (list them) 	<p>Attached:</p> <p>Committee report & appendices Letter from Bromley Chief Executive Letter from Steve Reed MP Letter from Ellie Reeves MP</p>
11	<p>ANY OTHER RELEVANT FACTORS TO TAKE INTO ACCOUNT</p>	<p>Judgment in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] EWHC 72</p>

Pursuant to the delegation from the Leader dated 11 January 2021 and having due regard to:

- the above referenced information;
- the attachments;
- the Council's public sector equality duty;

- the comments and recommendations from the Traffic Management Advisory Committee;
- the contents of the report to the Traffic Management Advisory Committee and supporting appendices;
- the minutes of the Traffic Management Advisory Committee including details of representations received from officers, members of the public and other interested parties and any subsequent questions asked by the Traffic Management Advisory Committee (including viewing the webcast where necessary)

I hereby:

- agree to the recommendations in paragraphs 1.1-1.2 of section 9 above for the following reasons

Taking into account everything set out in the January 2021 Report including the consultation responses, criticisms levelled at the Temporary LTN and views of the Traffic Management Advisory Committee, I consider that the existing Crystal Palace and South Norwood Temporary Low Traffic Neighbourhood should be removed irrespective of the decision in respect of the Experimental Orders.

- request the following additional information to enable me to consider the recommendations in paragraphs 1.1 and 1.3 – 1.7 of section 9

An addendum to the January 2021 Report addressing the judgment of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] and the impact, if any, on the recommendations in respect of the proposed experimental order which were made to the Traffic Management Advisory Committee in the January 2021 Report.

- wish the following questions to be put to the Traffic Management Advisory Committee/ officers/ persons who made representations to the Committee/in response to the consultation to enable me to further consider the consider the recommendations in paragraphs 1.1 and 1.3 – 1.7 of section 9

Following preparation of the addendum to the January 2021 Report, does the Traffic Management Advisory Committee endorse the recommendations 1.1 and 1.3-1.7 of section 9, or such other recommendations in the addendum, in respect of the proposed experimental order.

- request the additional information and questions to be put to the Traffic Management Advisory Committee/ officers/ persons who made representations to the Committee/in response to the consultation to enable me to further consider the consider the recommendations in paragraphs 1.1 and 1.3 – 1.7 of section 9 for the following reasons:

Whilst, currently, I am minded to acknowledge that the recommended Experimental LTN addresses many of the concerns and criticisms levelled at the Temporary LTN, I now need the views of TMAC upon the judgment of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021], following receipt of which I will consider taking a decision in respect of this matter. During the debate at the Traffic Management Advisory Committee, the following key points were raised. The Cabinet Member for Sustainable Croydon has considered these, and has asked officers to investigate and address them as follows:

- **Response from local school and how we will work with them to resolve their concerns**

The two local schools have both expressed concern with regards access to their establishments by teachers and other staff. The team are to investigate how these concerns can be addressed to best effect for all concerned

- **Access for care workers**

The needs of our residents who require home care, be that via professionals or family members, must be considered so that they and their care givers are not disadvantaged by this scheme. Clarity needs to be given as to how the Council will deal with the essential needs of those affected.

- **Access for car clubs**

Car clubs do mean that there are less cars on our roads at any one time as households can rely on the use of such clubs almost entirely. Residents living within the zone that do not have access to their own car or rely from time to time on the use of car club alternatives should not be penalised for trying to reduce their reliance upon the ownership of a car or similar. The team is to investigate how car clubs can be incorporated into the operation of the zone in a similar way to Care Givers.

- **Period of experimental order**

It is acknowledged that the Committee did not want the Experimental TRO to last beyond 12 months, with a review at that stage.

- **Engagement with the London Borough of Bromley**

Officers to report to TMAC on a regular basis to allow for the updating of the committee as we work together with Bromley to progress the scheme.

Notwithstanding the above, since the meeting of TMAC I have been made aware of the judgment of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] EWHC 72 which has quashed the London Streetspace Plan and Transport for London's "Interim Guidance to Boroughs". Whilst I understand that the quashing order is stayed pending appeal by TfL, I consider it necessary to fully understand the impact of the judgment, if any, on the recommendations to the Traffic Management Advisory Committee, to take a decision in relation to the proposed Experimental Orders which will comprise the Low Traffic Neighbourhood.

- * delete as appropriate

The options I have considered and rejected in making this decision are the following:

The options considered and rejected are:

1. Leaving the Temporary LTN in place pending a decision on an experimental LTN.

.....
Print Name

Muhammad Ali

.....
Signature



.....
Title

Cabinet Member for Sustainable Croydon
.....

REPORT TO:	TRAFFIC MANAGEMENT ADVISORY COMMITTEE 12 January 2021
SUBJECT:	The Crystal Place and South Norwood Low Traffic Neighbourhood
LEAD OFFICER:	Shifa Mustafa, Executive Director, Place Steve Iles, Director, Public Realm
CABINET MEMBER:	Councillor Muhammad Ali, Cabinet Member for Sustainable Croydon
WARDS:	South Norwood, Crystal Palace and Upper Norwood

CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON

The recommendations address the Council's Corporate Plan priorities:

- *Easy, accessible, safe and reliable, making it more convenient to travel between Croydon's local places*
- *Less reliance on cars, more willingness to use public transport, walk and cycle and*
- *Invest in safe cycle lanes between central Croydon and local centres*

[Corporate Plan for Croydon 2018-2022](#)

CLIMATE EMERGENCY

The recommendations address priorities in the Climate Change report and the resulting declaration of a 'Climate Emergency', priorities including:

- *Croydon Council become carbon neutral by 2030;*
- *Work with the Mayor of London to meet the aim for London to be a zero-carbon city by 2050;*
- *Work with communities across Croydon to ensure that all residents and businesses are empowered and encouraged to play their part in making the Croydon the most sustainable borough in London;*
- *role of all elected Members in leading this agenda.*

[Climate Change report](#)

FINANCIAL IMPACT

The costs arising from implementing, consulting on and monitoring the Experimental LTN are proposed to be met from Active Travel Funding provided to London by the Secretary of State for Transport (via Transport for London (TfL)), and from funding allocated to the London Borough of Croydon Council ('Croydon Council') by TfL to support the Council implement its Local Implementation Plan.

FORWARD PLAN KEY DECISION REFERENCE NO.: 6520SC

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.

1. RECOMMENDATIONS

That the Traffic Management Advisory Committee recommend to the Cabinet Member for Sustainable Croydon that they:

1.1 Consider:

- a) the responses received to the informal consultation on the options for the future of the Crystal Place and South Norwood Temporary Low Traffic Neighbourhood and other feedback.
- b) the Mayor of London's Transport Strategy and the Council's plan to implement it within the Borough (the Croydon Local Implementation Plan).
- c) the Council's statutory duties, including its duties under the Road Traffic Regulation Act 1984, in particular its duties under s.9, s.121B and s.122, its duties under the Traffic Management Act 2004, in particular its duty under s.16, its duties under the Equality Act 2010, in particular under s.1 and s.149 (the public sector equality duty).
- d) the statutory guidance 'Traffic Management Act 2004: network management in response to COVID-19' as updated on 13 November 2020.
- e) the other matters within and referred to within this report.

1.2 Agree to the removal of the measures implementing the Temporary Low Traffic Neighbourhood as soon as practicable and in any event prior to the implementation of the recommended Experimental TRO.

1.3 Agree (subject to Spending Control Panel agreeing to the spending of ring fenced grant funding) to implement an Experimental Low Traffic Neighbourhood at Crystal Palace and South Norwood 'Experimental LTN' by the making of an Experimental Traffic Regulation Order (Experimental TRO) to operate for up to 18 months, to:

1.3.1 prohibit access and egress by motor vehicles (other than certain exempt vehicles) at the following locations:

- (a) Sylvan Hill at the common boundary of Nos.11 and 13
- (b) Lancaster Road junction with Goat House Bridge
- (c) Fox Hill junction with Braybrooke Gardens
- (d) Stambourne Way junction with Auckland Road
- (e) Bus gate introduced at the common boundary of Nos. 86 and 84a(Auckland Road Surgery) Auckland Road

These restrictions to be enforced through Automatic Number Plate Recognition (ANPR) camera technology, shall not apply in respect of:

- (a) a vehicle being used for fire brigade, ambulance or police purposes;
- (b) anything done with the permission of a police constable in uniform or

- a civil enforcement officer;
- (c) a vehicle being used for the purposes of a statutory undertaker in an emergency, such as the loss of supplies of gas, electricity or water to premises in the area, which necessitates the bringing of vehicles into a section of road to which the order applies;
- (d) vehicles to which a valid exemption permit has been provided;
- (e) licensed taxis at the bus gate only.

1.3.2 Introduce two disabled persons Blue Badge parking bays outside Nos. 84 and 86 Auckland Road.

for the reasons set out in this report and summarised at paragraph 3.12 and 15.3 of the report.

1.4. Delegate to the Director of Public Realm the authority to vary the provisions of the Experimental TRO including the exemptions to the restrictions.

1.5 Instruct officers to continue to seek to work with those in Bromley Council to mitigate effects predicted to arise from the Experimental LTN in certain residential access streets in Bromley.

1.6 In relation to Equality to agree:

- i) that the equality implications of the recommended Experimental Traffic Regulation Order have been the subject of careful consideration in compliance with the Council's obligations under sections 1 and 149 of the Equality Act 2010;
- ii) nevertheless there should be further equality impact analysis including through focused engagement with the members of groups with protected characteristics potentially most affected by the proposed change in and around the area of the current LTN during the operation and improvement of the Experimental TRO

1.7 That a recommendation on the future for the Experimental LTN be brought to the Traffic Management Advisory Committee at the appropriate time.

2. EXECUTIVE SUMMARY

2.1 This report outlines the evolution of the Temporary LTN at Crystal Palace and South Norwood, implemented in stages in response to the ongoing Covid19 Pandemic. It draws on:

- Guidance issued by the Department of Transport in May, when the Secretary of State for Transport was calling on all local authorities to respond swiftly to the Pandemic, to create space for social distancing, walking and cycling, with measures including using planters to close streets to create Low Traffic Neighbourhoods (LTNs).
- The refreshed Guidance published in November where the Secretary of State continues the call for action drawing on the government's 'Gear

Change: A Bold vision for cycling and walking' published in July, which sets out a range of commitments to increase levels of active travel in the medium to longer term, emphasising that reallocating road space is very much part of that vision.

- TfL's and the Mayor of London's 'Streetspace Plan for London' response to the Pandemic. (The purpose of the Plan (as explained by the Mayor) being to fast-track the transformation of streets across London to enable millions to change the way they get about the city)

2.2 Appendix 2 to this report explains that the Crystal Palace and South Norwood Temporary LTN, is an example of where rapid action to respond to the Pandemic meets policy (primarily in the form of the Mayor of London's Transport Strategy and the Council's statutory plan to implement that Strategy within the Borough). Outlined in this report are the wider policy reasons why a LTN should be considered at this location. These include the Corporate Plan priorities and those relating to the declaration of a Climate Change Emergency, set out above. LTNs are also a means of delivering key elements of the statutory Local Implementation Plan and the Mayor of London's Transport Strategy, in particular the Mayor's Healthy Streets objective¹. In turn, the Healthy Streets approach is intended to address the issues of inactivity and obesity, and the resulting health crisis facing Croydon.

2.3 This report explains that:

- since the introduction of 'Waze' and other driver route finding apps a decade ago, vehicle miles driven on London's streets have risen sharply, to their highest ever. All this increase has been on minor unclassified roads/streets, where traffic levels have almost doubled, now almost equaling that on London's A Road network.
- vehicle miles driven in Croydon have followed the same trajectory, with traffic on Croydon's roads and streets now at its highest level ever.
- CO₂ emissions from vehicles on Croydon's minor roads and streets, almost equals that emitted from its A Roads, with 129,000 Tonnes of CO₂ emitted from its minor streets in 2018, more than in any other London borough.

2.4 The Equality Analysis informing this report explains that 'Low Traffic Streets' are 'High People Streets' and conversely, 'High Traffic Streets' are 'Low People Streets'. It explains the physical, mental and community health impacts of High Traffic/Low People Streets arising from past decisions and recent trends. It explains how different groups have been differently impacted by these decisions and changes, children's independent mobility having been curtailed the most.

2.5 This report includes assessments undertaken by PJA consultants on behalf of Croydon Council, and by TfL, into traffic related effects potentially arising from the Temporary LTN. The findings of neither assessment suggest that any potential effects are of such magnitude or significance that an Experimental LTN should not be pursued (especially if Bromley Council can be persuaded to

¹ <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>

work with Croydon Council). The operation of a time limited Experimental LTN enables the effects arising from it to be monitored and assessed including when the Covid19 Pandemic has subsided and public transport capacity is back to normal.

2.6 This report also summarises the results of a main consultation on the current Temporary LTN and a consultation with businesses, along with other feedback received. A Total of 4315 responses to the main consultation were received (and analysed) from across London (and wider). The consultation demonstrating what the Secretary of State for Transport has called ‘the noise and passion schemes can generate’. It has not achieved what the Secretary of State is asking for in terms gathering a ‘truly representative picture of local views’. The views received are from much wider than the ‘local’. The population sample does not reflect the population within the Temporary LTN Area especially in terms of age profile and ethnicity. The Secretary of State reminds us that consultation ‘should not be confused with listening only to the loudest voices or giving any one group a veto’. The recommended Experimental LTN is the opportunity to undertake the focussed research the Secretary of State says is needed to achieve a ‘truly representative picture of local views’, including using the ‘scientific polling’ he recommends.

The recommended Experimental LTN responds to feedback on the effects of the Temporary LTN including concerns about journey distance and time for emergency service vehicles, and the greater distance needed to drive by some residents living within the Temporary LTN to get to and from their homes.

2.7 This additional feedback includes online petitions against the temporary closure to though motor traffic at Lancaster Road/Southern Avenue and at Sylvan Hill, Stambourne Way and Fox Hill. . The geographical spread of those responding to the consultation and the petitions (responses from across the UK, across London and across south London) draw into clear focus the decision to be made. Should Auckland Road, Lancaster Road and Southern Avenue be:

- (a) given back to informally acting as single function distributor roads, attempting to meet the demand for longer distance car journeys; or
- (b) helped to return to being multi-functional streets, streets being the place where historically much of the life in cities and communities has taken place?

2.8 This report recommends that an Experimental LTN be implemented at Crystal Palace and South Norwood by way of an experimental traffic order under Section 9 of the Road Traffic Regulation Act 1984. The recommended Experimental LTN would use ‘No Motor Vehicle’ signs, and in Auckland Road signs prohibiting all vehicles except for buses, cycles and taxis (to create what is often called a ‘bus gate’) all enforced by cameras and automatic number plate recognition technology, rather than physical restrictions, with exemption permits for vehicles:

- belonging to residents within the Experimental LTN area (see Appendix 1) and
- used by district nurses in the course of their duties.

All emergency service vehicles would be exempt from the restrictions. The aims of the Experimental LTN include improving access for those walking and

cycling. When combined with neighbouring LTN's, the aim is for their effect to be greater than the sum of their parts, providing purposeful strategic cycling and walking routes, including meeting cycling demand identified by TfL along the only 'Top Priority' cycling corridor in Croydon. The aim is also to help reclaim the role of streets as social and community space, helping support physical, mental and community health. This report sets out the key factors that need to be considered and balanced, including the results of the consultation, in the decision whether to implement the Experimental LTN.

- 2.9 An experimental traffic order is time limited. It enables a proposal to be monitored and assessed 'in reality'. The Temporary LTN has been accused of worsening traffic conditions (and hence air quality) on neighbouring A Roads and in neighbouring communities, where there is greater deprivation and more members of Black and Minority Ethnic groups living. Through the publicity given to the consultation on the Temporary LTN (by both the Council and the 'Open our Roads' group), a large response rate was achieved. However, the population responding to the consultation does not reflect that within the LTN or neighbouring areas in terms of ethnic diversity, age or income. The Experimental LTN provides the opportunity to fully assess any wider traffic effects potentially arising from the LTN (including air quality) and if significant effects are found, whether these have the potential to impact different groups to a greater or lesser extent. It is also the opportunity to better understand how the LTN might benefit different groups.
- 2.10 The recommended approach is considered to comply with relevant statutory obligations and requirements, and in particular the Council's statutory duties, under the Road Traffic Regulation Act 1984, in particular its duties under s.9, s.121B and s.122, its duties under the Traffic Management Act 2004, in particular its duty under s.16, its duties under the Equality Act 2010, in particular under s.1 and s.149 (the public sector equality duty).
- 2.11 The costs arising from implementing, consulting on (including 'scientific polling') and monitoring the Experimental LTN are proposed to be met from Active Travel Funding provided to London by the Secretary of State for Transport (via Transport for London (TfL)), and from funding allocated to the London Borough of Croydon Council ('Croydon Council') by TfL to support the Council implement its Local Implementation Plan (and hence the Mayor's Transport Strategy).

3. BACKGROUND TO THE RECOMMENDED EXPERIMENTAL LTN

Location

- 3.1 This report makes recommendations regarding the short term future for the Temporary LTN. The Temporary LTN is focussed on Auckland Road / Lancaster Road, and bounded by the A215 South Norwood Hill, A212 Church Road and the railway line connecting Crystal Palace and Norwood Junction. It is adjacent to the Upper Norwood 'Triangle', where the A212, and A214 converge. The 'Triangle' has a long history of concerns associated with the motor traffic that passes through it, and the impacts arising from that traffic. Similarly there have been longstanding concerns about the speed and volume of traffic passing through Auckland Road/Lancaster Road and Southern Avenue.

Local Implementation Plan

- 3.2 The Plan to implement the Mayor of London's Transport Strategy within Croydon (the Local Implementation Plan (LIP)) proposed working with schools and residents to deliver 'Healthy Schools Neighbourhoods (see Appendix 2) including at Upper Norwood. In the latter part of 2019 engagement on the notion of a 'Healthy Schools Neighbourhood' was initiated with (and via) Cypress School, including with the residents of Southern Avenue. This engagement was put on hold with the start of the Covid19 Pandemic. Similarly, traffic surveys intended to inform the local discussion and development of proposals were not taken forward once the first Lockdown started.

The Covid19 Pandemic and the Evolution of the Temporary LTN

- 3.3 What more recently has become referred to as the 'Crystal Palace and South Norwood Temporary Low Traffic Neighbourhood', began with Lancaster Road and Warminster Road in South Norwood being temporarily closed to through motor traffic. At the same time, similar temporary measures were being introduced at nearby Albert Road and Holmesdale Road, plus elsewhere in Croydon and other London boroughs. These and other measures were introduced in response to the Covid19 Pandemic, responding to calls from residents to address the speed and volume of traffic in their streets. Importantly, Auckland Road was already closed for SGN emergency gas works, and Church Road A212 was half closed with temporary traffic signals controlling alternating one-way flows in the open half of the carriageway.
- 3.4 Around the same time, the Secretary of State for Transport was commending those local authorities that had already taken swift action, calling on others to do so, and in any event, act within a matter of weeks. The call was to create space for social distancing, walking and cycling, with the measures to include using planters to close streets to create Low Traffic Neighbourhoods.
- 3.5 Concurrently, TfL announced that the funding previously confirmed to support local authorities deliver measures to help implement their LIPs (including in Croydon's case funding to develop Healthy Schools Neighbourhoods at Upper Norwood and Broad Green), would not be provided, at least for the first half of the financial year. Instead there would be funding to swiftly deliver (with a deadline of early October) measures to implement TfL's and the Mayor of

London's Streetspace Plan for London. The purpose of the Plan (as explained by the Mayor) being to fast-track the transformation of streets across London to enable millions to change the way they get about the city.

- 3.6 TfL published research in support of its Streetspace Plan, to help the local authorities focus their interventions, research which includes its 'Temporary Strategic Cycling Analysis' and its 'Strategic Neighbourhood Analysis'. The former identified high priority cycle corridors (corridors with the greatest potential for people to switch from cars and other motor transport, to cycling) the one 'Top Priority' corridor in Croydon being from Crystal Palace into the Town Centre, along the line of Auckland Road and Holmesdale Road. The 'Strategic Neighbourhood Analysis' draws on a series of data sets (including the indices of multiple deprivation) to indicate areas to be considered for Low Traffic Neighbourhoods. In Croydon, these are predominately in the north of the Borough, including the Holmesdale Road, Albert Road and Auckland Road/Lancaster Road areas. These and other information were used by officers to produce a more strategic response to the Streetspace Plan for London within Croydon.
- 3.7 Once SGN announced it would be reopening Auckland Road, a swift decision was required as to whether to reopen Lancaster Road and hence Southern Avenue to high volumes of through traffic, or to seek to replace the SGN temporary closure. The decision was for the latter, necessitating further action in stages, namely the:
- replacement of the Auckland Road temporary closure with a camera enforced 'bus gate' allowing the 410 bus to return to its route
 - placing of planters in Sylvan Hill, Stambourne Way and Fox Hill to keep through motor traffic out of these streets (and the northern section of Auckland Road), displaced by the bus gate in Auckland Road and seeking to avoid the traffic queue in Church Road arising from the temporary traffic signals.

This had the effect of some drivers seeking to avoid the traffic that queues down Anerley Hill (from the signal junction with Crystal Palace Parade), by using Belvedere Road, Cintra Park, Patterson Road and Milestone Road within Bromley. As the temporary measures were being implemented in Sylvan Hill, Stambourne Way and Fox Hill, officers reached out to Bromley officers, to work to deliver mitigation in the Bromley streets (if felt to be needed). Bromley Council has, in the strongest terms, called for the temporary measures to be removed, indicating that it will only talk with Croydon Council once the Temporary LTN is removed. TfL has however, facilitated an officer level discussion between Bromley and Croydon Councils, officers having met twice.

- 3.8 A considerable quantity of feedback has been received, including via the 'highwayimprovements' email inbox and the semi interactive map on the Council's Streetspace webpages. Much of that feedback was negative, from those opposed to the notion of such an initiative, or supporting the principle of such a scheme, but objecting to the lack of consultation. Others living in the area of the Temporary LTN objected to the extended distances required to drive to and from their homes. Some were concerned at the extended distance

required to drive to the Auckland Surgery, especially if approaching from the south. Others expressed concern at the extra distance (and hence time) emergency service vehicles are required to travel to reach some properties in the area. As some issues were addressed at Sylvan Hill, Stambourne Way and Fox Hill, others arose in Milestone Road, Patterson Road, Cintra Park and Belvedere Road in Bromley. Throughout this period, the temporary traffic signals in Church Road were causing extensive queuing in Church Road, impacting on the operation of the one-way Crystal Palace 'Triangle' traffic gyratory. Numerous complaints were received, which were suggesting that the Temporary LTN was causing traffic that could no longer use the unclassified Auckland Road, to use the A Roads converging at the 'Triangle', this having the effect of creating more traffic in the 'Triangle', which in turn was impacting on the environment, the local economy and people's health. Others suggested the Temporary LTN was leading to increases in traffic on the A Roads bounding it, leading to a worsening of already poor air quality in areas of higher deprivation and where greater numbers of members of Black and Minority Ethnic Groups are resident. Many of these arguments have been put forward by the 'Open our Roads' group and are being put to the High Court in a case against the Temporary LTN.

- 3.9 Croydon officers continued to press for the full opening of Church Road. As soon as the temporary traffic signals were removed, consultation on the future for the Temporary LTN was embarked upon. The intention was that consultation happen when people could experience the streets without the effects arising from the temporary traffic signals in Church Road. Consultation did however, coincide with the second national Lockdown. Consultation with local businesses was postponed until after the second Lockdown, and has just concluded.

Consultation

- 3.10 The consultation sought views on three options for the temporary scheme:
1. To replace the physical planter closures with 'No Motor Vehicle' restrictions and signs enforced by cameras, with vehicles belonging to residents of the area (Appendix 1) being exempt.
 2. To retain the scheme, continuing to employ physical measures to prohibit through motor traffic.
 3. To remove the Temporary LTN entirely.

In each of the first two options, a signed and camera enforced 'bus gate' would be retained in Auckland Road, its location moved northwards to be by the Auckland Surgery.

- 3.11 The main consultation achieved a very wide reach. The QR code provided on letters and notices to assist people responding from their devices, was clicked on around the world. 6022 letters with individual response codes were delivered to households within the area of the Temporary LTN and on the bordering A Roads, eliciting 1,523 responses. Responses differed based on location and experience of the Temporary LTN. A Total of 4315 responses were received and analysed from across London (and wider). The consultation

demonstrating what the Secretary of State for Transport has called 'the noise and passion schemes can generate'. It has not achieved what he is asking for in terms gathering a 'truly representative picture of local views'. The views received are from much wider than the 'local'. The population sample does not reflect the population within the Temporary LTN Area especially in terms of age profile and ethnicity. The recommended Experimental LTN is the opportunity to undertake the focussed research the Secretary of State is saying is needed to achieve 'truly representative picture of local views'

Reasons for the Recommendation

3.12 Having considered the responses to the consultation, other feedback and the various other matters within this report, it is recommended to remove the Temporary LTN and to implement an Experimental LTN trial of option 1. This would be implemented by the making of an experimental traffic order under section 9 of the Road Traffic Regulation Act 1984, the effect of which would be to prohibit access and egress by motor vehicles (other than certain exempt vehicles) at the following locations:

- (a) Sylvan Hill at the common boundary of Nos.11 and 13
- (b) Lancaster Road junction with Goat House Bridge
- (c) Fox Hill junction with Braybrooke Gardens
- (d) Stambourne Way junction with Auckland Road
- (e) Bus gate introduced at the common boundary of Nos. 86 and 84a(Auckland Road Surgery) Auckland Road

The restrictions would be enforced through Automatic Number Plate Recognition (ANPR) camera technology. They would not apply to:

- (a) a vehicle being used for fire brigade, ambulance or police purposes;
- (b) anything done with the permission of a police constable in uniform or a civil enforcement officer;
- (c) a vehicle being used for the purposes of a statutory undertaker in an emergency, such as the loss of supplies of gas, electricity or water to premises in the area, which necessitates the bringing of vehicles into a section of road to which the order applies;
- (d) those motor vehicles to which a valid exemption permit has been provided;
- (e) licensed taxis at the bus gate only.

The experimental traffic order would also designate two disabled persons Blue Badge parking bays outside Nos. 84 and 86 Auckland Road.

3.13 The recommended Experimental LTN addresses many of the concerns and criticisms levelled at the Temporary LTN. By exempting vehicles belonging to residents within the area (See Appendix 1) the inconvenience caused to those living within the Temporary LTN area and owning cars (currently arising from longer distances to drive in and out of the Temporary LTN) is removed. It responds to concerns regarding emergency service vehicles, providing ease of access for these vehicles. It responds to concerns about access to the Auckland surgery by relocating the bus gate and providing two on street parking bays for vehicles displaying Blue Badge parking permits. It also responds to concerns regarding ease of access for health care workers by including exemption permits for vehicles used by district nurses. It responds to a request

from the United Cabbies Group to permit licenced taxis to pass through the bus gate.

- 3.14 An experimental traffic order may remain in force for up to 18 months. This will enable comprehensive monitoring of the effects of the Experimental LTN, including for after the Covid19 Pandemic subsides. When determining whether to make the Experimental LTN permanent at the end of the experimental period, any objections received by the Council following the notice of making published in respect of a relevant experimental order must subsequently be treated as an objection made in respect of the permanent LTN. The Experimental LTN would be accompanied by a further process of focussed stakeholder engagement including with members of groups with protected characteristics that could not be effectively engaged with during the Covid19 Pandemic. The Council has undertaken a substantial Equality Analysis in relation to the recommended implementation of the proposed Experimental TRO in accordance with its duties under sections 1 and 149 of the Equality Act 2010. Nevertheless it is proposed that further equality analysis should be undertaken during the operation of the Experimental LTN and that this will inform the decision on future traffic management arrangements. It is envisaged that the experimental aspect will run for 12 months to fully assess the effects of the experiment, at the end of which a recommendation would be brought to the Traffic Management Advisory Committee regarding future traffic management arrangements. The operation of the Experimental LTN will be regularly reviewed including with a view to further increasing ease of access into and egress from the LTN for wider group of motor vehicle types and drivers.
- 3.15 The reasons for the recommendation are summarised here and dealt with in more detail in the remainder of the report and the appendices.
- i) **Covid19 Pandemic:** The Covid19 Pandemic remains, and the Secretary of State for Transport has recently reiterated his call to local authorities to take action to help people choose to walk and cycle, providing further funding to support local authority action.
 - ii) **Mayor's Transport Strategy:** Low Traffic Neighbourhoods are a key means of implementing the Mayor of London's Streetspace Plan and his Transport Strategy, in particular the Healthy Streets approach and objective.
 - iii) **Expeditious, Convenient and Safe Movement of Vehicular and other Traffic:** A Low Traffic Neighbourhood creates quieter, calmer and safer streets for those living within the Neighbourhood. When combined with other such neighbourhoods, a network of quiet streets is created helping people make more journeys by walking and cycling. The Crystal Palace and South Norwood Temporary LTN and the Holmesdale Road Temporary LTN cater for the 'Top Priority' cycling corridor between Crystal Palace and the Town Centre, identified by TfL.

Whilst monitoring the effects arising from the Temporary LTN was challenging (during the Covid19 Pandemic, during related national Lockdowns and the changing traffic patterns and levels) analysis of its effects has been undertaken by Council commissioned PJA consultants and by TfL. Both suggest that many of the traffic related impacts assigned to the Temporary LTN, were in large part arising from the temporary traffic signals in Church Road, and the wider network effects these were having. There are effects from the Temporary LTN in Belvedere Road, Cintra Park, Patterson Road and Milestone Road, and monitoring indicates potential effects in Seymour Villas / Selby Road in Bromley. Beyond these streets (where ideally mitigation would be provided) the findings of the two analyses do not indicate effects of such magnitude or significance arising from the Temporary LTN, to suggest that an Experimental LTN should not be embarked upon. The running of an Experimental LTN allows effects to be monitored and tested. The Council is appreciative of its obligations under both s122 of the Road Traffic Regulation Act 1984 and s16 of the Traffic Management Act 2004. All of the factors which the Council is required to consider have been incorporated in the formulation of the recommendation to implement the Experimental LTN and will continue to be considered throughout the duration of the Experimental TRO. Croydon officers should seek to agree a monitoring strategy with Bromley Council (and TfL) and continue to seek to work with Bromley officers to address displacement of traffic onto residential access streets within Bromley.

An Experimental LTN has the potential to help people choose active travel, in turn helping to achieve health and environmental improvement. The monitoring strategy for the Experimental LTN would be designed to assess its level of success in this regard.

- iv) **Equality:** The Equality Analysis undertaken prior to recommending the Experimental LTN suggests that children are a group whose independent mobility and ability to play and socialise within the street, has been impacted the most by historic decisions and unconscious changes in how our streets are used. They are a group whose physical and mental health is being put at risk due to inactivity / being denied the freedom to walk, cycle and play. Around a quarter of the population within the trial LTN area are under the age of 18 and consequently cannot drive. In addition, ownership of a driving licence is much lower amongst young adults compared to the general adult population. Some have pointed to the fact that there are areas of deprivation outside of (but close to) the current Temporary LTN. It is the case that the areas where the Albert Road and Holmesdale Road Temporary LTNs have been implemented, are amongst the top 10 to 20% most deprived areas in England. However TfL's Strategic Neighbourhoods Analysis indicates that the area of the recommended Experimental LTN is close behind, falling into the 20 to 30% most deprived in the England bracket. The area of the recommended LTN and other neighbouring areas of deprivation are also amongst the ones where households have some of the lowest levels of car ownership / availability in the Borough.

- v) **Environment Including Air Quality:** Just as residents of Croydon and Bromley see air quality and its effects on human health as a serious concern, so do central government and the Mayor of London. The approach taken by both central government and the Mayor to tackle emissions from road transport, is to:
- help and encourage people to choose to travel by cleaner and active means; and
 - reduce the emissions from the remaining motor vehicles.

Both central government and the Mayor see Low Traffic Neighbourhoods as an important means of helping people choose to travel more actively. Both Croydon and Bromley benefit from being in outer London where concentrations of locally important pollutants are lower compared to inner and central London. When modelled concentrations of Nitrogen Dioxide (NO₂) in London were last published (2016), no school in Croydon or Bromley was in a location exceeding the limit value/objective for NO₂, compared with 35 out of 42 schools in Camden². In and around the Temporary LTN and proposed Experimental LTN, concentrations of air borne particulate matter smaller than 10 and 2.5 microns (PM₁₀ and PM_{2.5}) were below the UK legal limit in 2016, including on the A Roads bounding the Temporary LTN. However, the whole area was above the World Health Organisation (WHO) guideline limits, particulate matter seemingly no respecter of boundaries. In 2016, points within the temporary LTN area were below or at the UK legal limit (same as the WHO guideline) for NO₂. Some locations on the surrounding A Road exceeded the limit value.

The Mayor is continuing to take action to reduce air pollution, including further reducing the emissions from the most polluting vehicles by tightening the emissions standards applied through the London wide Low Emissions Zone (action postponed from October 2020 to March 2021 due to the Covid19 Pandemic). This and the expansion of the Ultra-Low Emission Zone in inner London (October 2021) are predicted to bring about significant further reductions in NO₂ concentrations, including at Crystal Palace and South Norwood. Neither TfL's nor the PJA consultant assessment of the traffic effects of the Temporary LTN found strong evidence to suggest an Experimental LTN would lead to traffic conditions on the surrounding A Roads and in the 'Triangle' such that they would counteract the positive effects predicted to arise from the Mayor's Low Emissions initiatives. However, assessment of air quality effects should be part of the monitoring strategy for the recommended Experimental LTN, including whether members of Black and Minority Ethnic groups are being differently affected.

² https://data.london.gov.uk/download/london-atmospheric-emissions-inventory--laei--2016/339630dc-11f4-498e-b70d-711fe3a49af0/Schools_exceeding_LAEI_2016.xlsx
In <http://content.tfl.gov.uk/lsp-interim-borough-guidance-main-doc.pdf>

Vehicle miles driven on streets and roads in Croydon have increased consistently since 2010, reaching their highest level ever. Vehicles registered to addresses in Croydon have risen from 148 thousand to 159.7 thousand between 2009 and 2019, the increase being almost entirely due to the increase in the number of cars registered (the vast majority of the vehicles registered in Croydon)³. Emissions of CO₂ from vehicles on minor streets in Croydon is equal to that emitted from vehicles on A Roads, with 129,000 Tonnes emitted from minor roads / streets and 132,000 Tonnes from A Roads in Croydon in 2018.

The recommended Experimental LTN works with central governments and the Mayor's approach to tackling emissions of local important air pollutants and CO₂ from road traffic.

- vi) **Health:** The Local Implementation Plan explains why it is important to use Low Traffic Neighbourhood type measures to help people travel more actively. It explains that:
- inactivity is having profound health effects and is a major contributory factor to the levels of obesity in Croydon;
 - one in five children in the school reception year are overweight or obese and this rate more than doubles between reception and year 6;
 - early childhood is a critical time to tackle childhood obesity as children are developing and learning healthy or unhealthy behaviours from a young age;
 - by year 6 (age 10 to 11 years) a greater proportion of children in Croydon carry excess weight than in London or nationally;
 - two in five children aged 10 to 11 years in Croydon are overweight or obese and this proportion is increasing over time;
 - for adults the situation is more serious with 62% of the population overweight or obese.
 - one in thirty working age people in Croydon have diabetes, a figure which is predicted to increase by 10% by 2025;
 - amongst older adults (over 65) one in eight are predicted to have diabetes and one in four are obese.
- vii) **Important Findings through Feedback and Consultation:** The Equality Analysis relating to the recommended Experimental LTN, draws on the 1963 Ministry of Transport study into the 'Long Term Problem of Traffic in Towns'. The study considered the 'Deterioration of Environment' identifying the issues arising from '*drivers are seeking alternative routes, mainly through residential areas, in order to avoid congested areas on main roads*'. The study highlighted some of the effects this was having relating to 'age', namely children. It proposed traffic levels that are compatible with play in the street and a reasonable quality of environment. It looked into the future to the era in which we now live and the traffic levels we see today. It suggested the creation of 'Environmental Areas' (areas free of extraneous traffic, and what we are

³ <https://www.gov.uk/government/statistical-data-sets/all-vehicles-veh01>

now calling LTNs) in between the 'Distributor Roads'. It envisaged the Distributor Roads (main streets and high streets) having been rebuilt as major urban highways in order to accommodate the predicted levels of traffic. This rebuilding has since been generally resisted and not taken forward, with the exception of places such as the Croydon Town Centre. Having not rebuilt our high streets and main streets as urban highways, the rising demand for car travel is being accommodated by different means in 21st Century London. Department for Transport (DfT) monitoring of vehicle miles driven on London's roads and streets indicates a dramatic increase over the last decade. The start of the increase coinciding with the launch of 'Waze' and other driver route finding apps / navigational devices. As London's principal road network has not been rebuilt to provide additional capacity, it is the unclassified minor roads and streets that have been both accommodating and facilitating the rising demand to drive. London's minor street network is now carrying almost as many vehicle miles as its A Road network.

The attempt to create an 'Environmental Area' or LTN has given rise to considerable anger (perhaps illustrated by the answers to the question in the consultation asking whether removing the temporary traffic signals from Church Road had improved conditions or made them worse, and over a thousand responding that it had made conditions worse or much worse.). The geographical spread of those responding to the consultation and anti LTN petitions (response from across the country, across London and across south London) draw into clear focus the decision to be made. Should Auckland Road, Lancaster Road and Southern Avenue be:

- (a) given back to informally acting as single function distributor roads, attempting to meet the demand for longer distance car journeys; or
- (b) helped to return to being multi-functional streets, streets being the place where historically much of the life in cities and communities has taken place?

3.16 If the recommendation is accepted by the Traffic Management Advisory Committee and then agreed by Cabinet Member, it could not be implemented directly:

- a) for the reasons arising from Section 121B of the Road Traffic Regulation Act 1984 set out at paragraphs 4.4, 4.5 and 4.6 of this report; and
- b) due to the time required to procure, install and set-up the ANPR cameras.

4. CONSIDERATIONS WHEN MAKING A DECISION AS TO WHETHER TO IMPLEMENT AN EXPERIMENTAL LOW TRAFFIC NEIGHBOURHOOD AT CRYSTAL PALACE AND SOUTH NORWOOD

The Traffic Management Duty

Section 16 of the Traffic Management Act 2004

- 4.1 Section 16 of the Traffic Management Act 2004 imposes 'The Network Management Duty', namely it is the duty of a local traffic authority to manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives:
- (a) securing the expeditious movement of traffic on the authority's road network; and
 - (b) facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.

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

- (a) the more efficient use of their road network; or
 - (b) the avoidance, elimination or reduction of road congestion or other disruption to the movement of traffic on their road network or a road network for which another authority is the traffic authority.
- 4.2 Section 31 of the Traffic Management Act defines 'traffic' as including pedestrians. The Traffic Management Act 2004, Network Management Duty Guidance⁴ explains that the Network Management Duty requires the local traffic authority to consider the movement of all road users: pedestrians and cyclists, as well as motorised vehicles. It also explains that the overall aim of the "expeditious movement of traffic" implies a network that is working efficiently without unnecessary delay to those travelling on it. But the duty is also qualified in terms of practicability and other responsibilities of the authority. This means that the Duty is placed alongside all the other things that an authority has to consider, and it does not take precedence.

Section 122 of the Road Traffic Regulation Act 1984

- 4.3 The recommended experimental traffic order would be made under Section 9 of the Road Traffic Regulation Act 1984. In exercising its powers under the Act of 1984, the Council is required, by s122 of the Act, 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 street, whilst at the same time having regard to the following considerations:
- the desirability of securing and maintaining reasonable access to premises;

4

<https://webarchive.nationalarchives.gov.uk/+http://www.dft.gov.uk/pgr/roads/tpm/tmaportal/tmafeatures/tmapart2/tmafeaturespart2.pdf>

- 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;
- Air quality (and specifically the National Air Quality Strategy prepared under section 80 of the Environment Act 1995);
- 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 Council to be relevant.

Section 121B of the Road Traffic Regulation Act 1984

4.4 Section 121B of the Road Traffic Regulation Act states that no London borough council shall exercise any power under the Act in a way which will affect, or be likely to affect a:

- GLA (TfL) road,
- Strategic Road or
- road in another London borough,

unless:

- i) the council has given notice of the proposal to exercise the power to TfL; and in a case where the road concerned is in another London borough, to the council for that borough; and.
 - ii) the proposal has been approved
 - in the case of a Strategic Road, by Transport for London and, where the road concerned is in another London borough, the council for that borough;
 - in the case of a road within another borough that is not a Strategic Road, by the London borough council concerned;
- or
- ii) the period of one month after the date on which TfL and, where applicable, the council received notice of the proposal, TfL or the council objecting to the proposal; or
 - iii) any objection made by TfL or the council has been withdrawn; or
 - iv) where an objection has been made by TfL or a London borough council and not withdrawn, the Greater London Authority has given its consent to the proposal after consideration of the objection.

4.5 The A212 is a Strategic Road⁵ between South Norwood Hill and A234 Crystal Palace Park Road. At the Crystal Palace 'Triangle', the A212 (Strategic Road) merges / combines with the A214 (non-Strategic) forming the one way gyratory system. Here the A212/A214:

- Church Road is a boundary road between the Boroughs of Croydon and Bromley
- Westow Street is within Croydon
- Westow Hill is a boundary Road between the Boroughs of Croydon and Lambeth and Southwark

⁵ <https://www.legislation.gov.uk/ukxi/2005/476/schedule/made>

- and A212 Crystal Palace Parade is a boundary road between the Boroughs of Bromley and Southwark.

4.6 Section 121B of the Act is applicable to the making of an experimental traffic order. If the recommendation to proceed with the Experimental LTN is agreed, notice will be issued under section 121B to TfL and Bromley, Lambeth and Southwark Councils.

The Greater London Authority Act 1999

4.7 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 and when deciding whether to make a traffic order.

The Health and Social Care Act 2012 and National Health Service Act 2006

4.8 The Health and Social Care Act 2012 sets a duty for the improvement of public health by amending the National Health Service Act 2006 so as to require each local authority to take such steps as it considers appropriate for improving the health of the people in its area.

The Education Act 1996

4.9 The Education Act 1996 (as amended) places various duties on local authorities including the promotion of sustainable travel and transport modes for the journey to, from, and between schools and other institutions, explaining that "Sustainable modes of travel" are modes of travel which the authority consider may improve either or both of the following:

- (a) the physical well-being of those who use them;
- (b) the environmental well-being of the whole or a part of their area.

The 'Home to School Travel and Transport Guidance: Statutory guidance for local authorities' explains that the sustainable school travel duty should have a broad impact, including providing health benefits for children, and their families, through active journeys, such as walking and cycling. It can also bring significant environmental improvements, through reduced levels of congestion and improvements in air quality to which children are particularly vulnerable.

The Crime and Disorder Act 1998

4.10 The Crime and Disorder Act 1998 places a duty on the local authority to consider crime and disorder implications of exercising its various functions. It is the duty of each authority to exercise its various functions with due regard to the likely effect of the exercise of those functions, and the need to do all that it reasonably can to prevent crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment).

The Equality Act 2010

- 4.11 The Equality Act 2010 places a duty on local authorities to comply with the provisions set out in the Act. The two provisions are:
- The duty under section 1 of the Equality Act 2010, to have due regard to the desirability of exercising the Council's functions in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage;
 - The public sector equality duty in s 149 of the Equality Act 2010 requires the Council to have due regard to the need to:
 - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The Human Rights Act 1998

- 4.12 The Human Rights Act 1998 states that it is unlawful for a public authority to act in a way which is incompatible with a right or freedom under the European Convention on Human Rights.

Effects of the Temporary LTN and Feedback Received

- 4.13 Feedback on the Temporary LTN and the consultation on options for its future, are addressed in Section 5 ('Consultation') below. The more direct assessment of traffic related effects which are potentially arising from the Temporary LTN, are addressed at Appendix 4; in the PJA consultants' (PJA) report at Appendix 4(a); and TfL report at Appendix 4(b).
- 4.14 Many residents and businesses of Croydon and Bromley (and beyond), are concerned that the Temporary LTN has led to an increase in traffic outside of it, principally on the A Roads surrounding it and forming the Crystal Palace 'Triangle' resulting in a variety of impacts. The PJA analysis and the TfL analysis provide insight into changes in traffic volume and behaviour on the A Roads, following implementation of the Temporary LTN.
- 4.15 PJA used 'Flow' data (derived from in vehicle telematics equipment) and other data, to paint a picture of the traffic effects arising whilst the Temporary LTN measures have been in place. The 'Flow' data can only paint a picture in broad brush strokes. However, it has proved a useful and informative exercise, especially when combined with TfL's own assessment of effects.
- 4.16 Because of how the 'Flow' data are derived, they are collected over extended time periods to try and build a sufficient sample. 'Flow' data for the period 'Before LTN', was taken from February 2019 to March 2019. This was before any temporary measures went into Lancaster Road and was also largely before the temporary traffic signals were installed in Church Road. The data used to assess the effects 'During LTN' were drawn from the period June to November.

This period starts prior to the temporary measures being placed in Sylvan Hill, Stambourne Way and Fox Hill (and hence the results have to be approached with caution). It also covered the period when the temporary traffic signals were in Church Road, severely constraining the capacity of the A212 / A214. It is also 'During Covid Pandemic' when traffic levels dropped sharply at the start of the first Lockdown but from April began to increase again.

- 4.17 The 'Flow' data were used to assess the number of vehicles using streets within the Temporary LTN to pass through the LTN without stopping at a destination within it, or starting the journey in the LTN. The same data were used to assess changes in traffic levels on the surrounding A Road Network including at the Crystal Palace 'Triangle'.
- 4.18 In broad terms, the analysis clearly picked up the drop in traffic through passing along Lancaster Road and Southern Avenue, and was able to indicate the scale of reduction. The results were a little less clear north of the temporary bus gate in Auckland Road, due to the time period over which the 'During LTN' 'Flow' data were collated, in relation to when the temporary measures were installed in Sylvan Hill, Stambourne Way and Fox Hill. The data do however indicate that the closure of Fox Hill:
- appears to have stopped a flow of traffic using it and Cintra Park to bypass the 'Triangle' to reach Anerley Hill;
 - (along with the temporary measures in Sylvan Hill and Stambourne Way) has resulted in drivers seeking to avoid the queues on Anerley Hill by diverting via Belvedere Road, Cintra Road, Patterson and Milestone Road.
- 4.19 The analysis also indicates an increase in through traffic using Seymour Villas and Selby Road in Bromley, (residential access streets that pre Covid19 Pandemic were carrying high levels of through traffic (especially considering their width)), when comparing 'During LTN' with 'Before LTN'. The PJA consultants do not believe they have the evidence to say that the Temporary LTN was the cause. However there is at least correlation.
- 4.20 With the above exceptions and some others, the analysis in broad terms suggests a drop in traffic levels including on the A Roads 'During LTN' compared with 'Before LTN.' The PJA report contains a series of images indicating the change in estimated traffic flow and journey time difference 'During LTN' compared with 'Before LTN' including the image below (red = increase in traffic flow and blue = reduction in traffic flow)

- This traffic increase also contributed to a moderate increase of median journey time in AM peak.
- Potential traffic displacement from Auckland Road in the AM peak. A continuous pattern of traffic increase in northbound direction can be seen in the AM peak, which begins from the southern end of South Norwood Hill.
- This pattern then continues along Church Road-Westow Street, turns right onto Westow Hill and travels up towards Crystal Palace Parade.

Church Road (Westow Street-Beulah Hill)

- Traffic flow increase for northbound AM peak, while reduction in PM peak and southbound in both peak periods.
- Serious increase in northbound median journey time in both peak periods.
- Potential traffic displacement from Auckland Road might have effect on journey time in the AM peak.
- Due to temporary signal arrangement on the southern section of Church Road overlapped almost exactly with the road closure/ temporary LTN measure, it is unclear how much of the journey time increase on Church Road could be attributed to the temporary LTN*
(*NB this point is picked up in the section below relating to TfL's analysis)

Crystal Palace Triangle

- Median journey time for general traffic on almost all routes around the Triangle have recorded moderate to significant increase for both peak periods, with a more serious picture showing in the PM peak.
- Potential traffic displacement from Auckland Road might have effect on journey time around the Triangle in the AM peak.
- While the PM peak shows a serious increase in journey time around the Triangle, all three roads around it have shown reductions in traffic flows.
- Under the nature of one-way gyratory system, the temporary signal arrangements and the significant increase of traffic along Central Hill westbound have caused the gridlock in the PM peak.

4.22 TfL has undertaken its own monitoring analysis. The TfL analysis relies primarily on bus journey time data provided by the iBus system. These are the same data used by PJA consultants as part of their analysis, except the TfL analysis is slightly more recent and so includes data gathered after the removal of the traffic signals from Church Road. The analysis indicates that on Anerley Hill northbound, journey times (hence traffic levels) dropped significantly with the start of the first lockdown. This was then followed by a continuous rise in journey time (presumed to be resulting from rising traffic levels). A similar pattern was observed south bound. TfL reports that journey times have decreased in both directions in recent weeks since the removal of the temporary traffic signals from Church Road. Journey times in both directions fell sharply back towards the baseline average at this point. This also coincided with the start of the second Lockdown. The TfL report includes SCOOT data which indicates more traffic moving along Anerley Hill in the AM and PM peaks once the temporary signals were removed, (i.e. more traffic moving in November (during Lockdown), compared with October) suggesting that the improvement in journey times was more likely a result of the removal of the temporary signals

from Church Road, rather than less traffic in Anerley Hill / Road in the second Lockdown.

4.23 Auckland Road has seen a significant improvement in journey times for the 410 bus in both directions.

4.24 Church Road is the corridor that saw the most clear and dramatic improvement in bus journey time with the removal of the temporary traffic signals, with journey time reducing straight to or below the baseline average. This provides an indication of the degree to which the temporary signals were the cause of delay in Church Road relative to traffic displaced by the Temporary LTN.

Figure 4.2 Average Weekday Journey Times on Church Road North Bound

Average Weekday Journey Times on Church Road NB Corridor, during 12hr Period (7am-7pm)

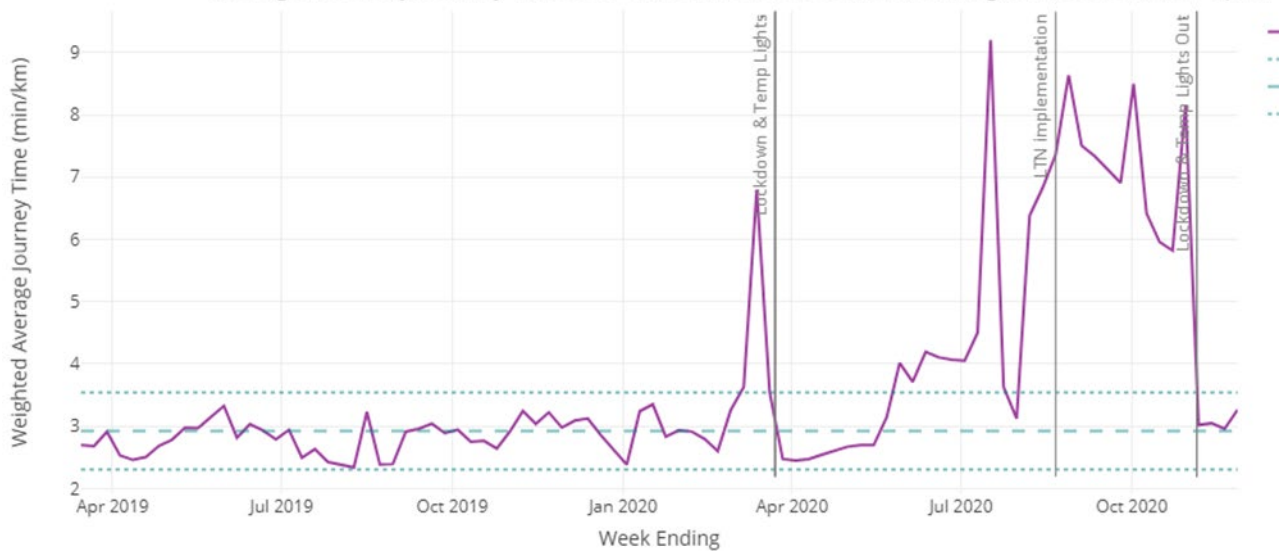
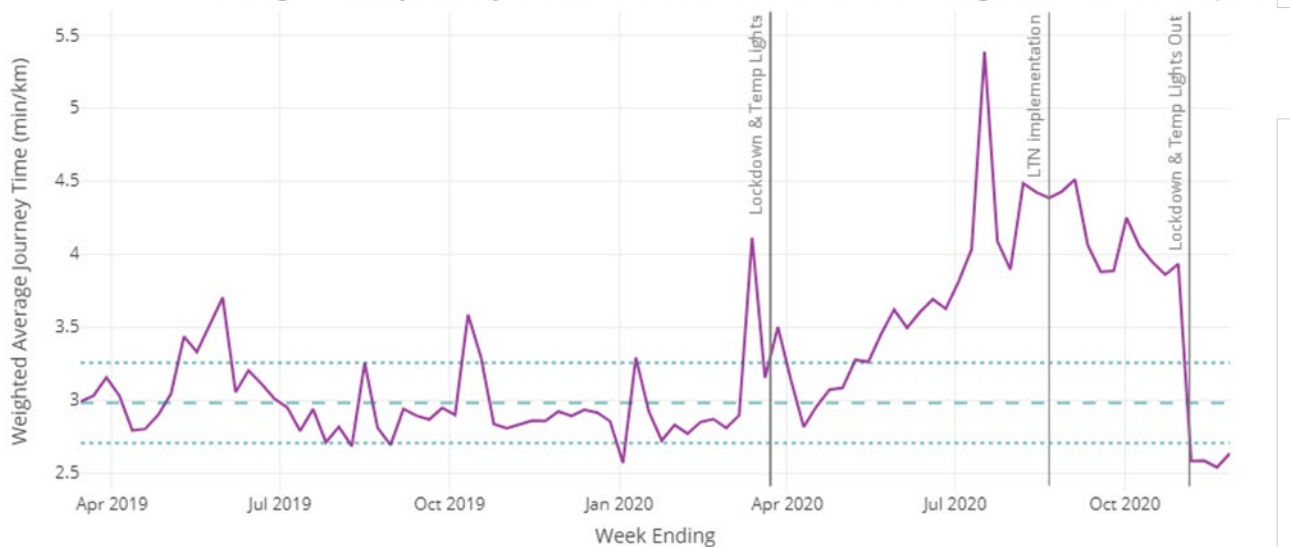


Figure 4.3 Average Weekday Journey Times on Church Road South Bound

Average Weekday Journey Times on Church Road SB Corridor, during 12hr Period (7am-7pm)



- 4.25 Northbound bus journey times on Crystal Palace Parade improved at the start of the first Lockdown and have stayed well below the baseline average. In contrast, the southbound bus journey times increased at the start of Lockdown and have remained above the baseline average. A similar mixed picture has been observed on the Penge Road corridor with journey times being consistently below average in one direction and consistently above in the other direction. It is not easy to say whether this changed pattern on the Penge Road corridor might be a result of the Crystal Palace and South Norwood Temporary LTN, The Holmesdale Road Temporary LTN, both or neither.
- 4.26 As well as having the Traffic Management Duty for the Strategic Road Network in London, TfL is also responsible for London's bus services. The monitoring strategy for the Experimental LTN should be developed and implemented in partnership with TfL (which has a further interest, it being a funder of the Temporary LTN and of the recommended Experimental LTN). Whilst TfL has not raised concerns regarding possible effects arising from the Temporary LTN, notice of the intention to implement the Experimental LTN (if the recommendation is agreed) will be given to TfL. If TfL has concerns it can object.
- 4.27 As with TfL, Croydon Council officers should seek to work with those of Bromley Council on the designs and implementation of the monitoring strategy for the Experimental LTN.

5. CONSULTATION

Pre-consultation Feedback

- 5.1 The LIP outlines the intended approach to engagement and participation as part of the development of 'Healthy Schools Neighbourhoods'. This approach was reiterated by the Head of Transport at a public meeting held in January 2020 at St John the Evangelist Church at Sylvan Road/Auckland Road. In the latter part of 2019, officers in the Strategic Transport Service had been engaging with and via Cypress School on the notion of a Healthy Schools Neighbourhood, and with the residents of Southern Avenue regarding the traffic impacts they had been experiencing over the years. The Covid19 Pandemic then arrived. The Strategic Transport Service and Highways Service moved to listening to requests to provide space for exercise and social distancing received via the Croydon Streetspace web pages (and other means). These pages were created as a response to the Covid19 Pandemic, one of the purposes being to receive requests from the public for local interventions, then comment on interventions once implemented.
- 5.2 Measures, including the creation of low traffic streets were implemented using Section 14 of the Road Traffic Regulation Act 1984 by emergency notice and by temporary traffic order. These powers do not include a requirement for advance public consultation. However, Croydon Council recognises that it is in the interests of fairness to engage with residents in connection with proposed changes, officers continued to receive feedback, predominately via the:
- 'highwayimprovement' email address and
 - semi-interactive map that was established on the Croydon Streetspace 'Get Involved' webpage in the latter part of May (here people could request interventions and/or feedback on what had already been implemented).

Pre-consultation feedback:

- 5.3 During and after implementation of the Temporary LTN, those wishing to comment on the scheme, raise concerns or suggest improvements were encouraged to do so via the semi-interactive map and the 'highwayimprovements' inbox. Throughout this period the temporary traffic lights in Church Road were severely reducing traffic capacity on the A212/A214 at Church Road and the 'Triangle'. Much of the feedback received related to additional traffic congestion.

Communication and feedback were further facilitated by:

- meetings with stakeholders such as the Auckland Surgery, 'Open Our Roads' campaigners, residents of Sylvan Hill and Stambourne Way.
- Letters were delivered to residents and businesses (23 and 30 July 2020) when Sylvan Hill, Stambourne Way and Fox Hill were to be closed to through motor traffic, seeking views on this and the wider scheme in general.
- Street notices and advance warning signs were installed on site.
- Local ward councilors, local groups, statutory groups and transport operators were informed, received feedback was generally relayed to

officers.

- Our counterparts at the London Borough of Bromley were notified.
- Popular navigation applications were informed of the closure points.
- Details of the temporary scheme were placed on the dedicated Streetspace webpage (established in September)
- Information and updates were being given via Council social media platforms.
- Several press releases were picked up in local newspapers.

Analysis of the comments received in the Highway Improvements Inbox:

5.4 A breakdown of analysis of feedback received in the Highway Improvement Inbox up until the end of October 2020 is shown below. It's important to note that a lot of emails received in the inbox were duplicates, with several residents writing in multiple times.

- Total number of responses received: 1,642
- Total number of responses that were duplications: 664 this equates to 40% of the total responses received.
- Of the 978 individual responses, there were 777 (79%) opposed, 184 (19%) in favour and 17 (2%) no opinion.

In summary the feedback received via the highway improvements inbox and the online interactive map suggested:

- Those affected wanted the Council to carry out a public consultation on the scheme
- Those affected expressed concerns about the location of the bus gate on Auckland Road and, as a consequence, its impact on access to the Auckland Road Surgery.
- A number of residents wrote in agreement with the scheme in principle, but requested a scheme that provided unhindered access to the streets within the LTN through a permit scheme that other London Boroughs have already introduced.
- Emergency services responded stating they would prefer an ANPR enforced LTN that provided unhindered access.

Consultation Feedback:

5.5 Directly following removal of the Church Road temporary traffic signals, a month long consultation was undertaken on three options for the future of the Temporary LTN:

- **Option 1: Replace**

This would involve removing all the physical planter closures from all five current locations (Lancaster Road, Warminster Road, Sylvan Hill, Stambourne Way, Fox Hill) and replacing them with 'No Motor Vehicles' signs, each with an exemption for 'eligible residents'. The traffic signs would be enforced with Automatic Number Plate Recognition (ANPR) cameras to prevent motor vehicles (except those belonging to residents with exemption permits or the emergency services) from entering or exiting by passing the signs.

It is proposed that “eligible residents” would be those living in certain streets within both Croydon’s and Bromley’s borough boundaries, as shown in the map at Appendix 1. It is proposed that the exemption permit be free of charge. The exemption would allow those living in the LTN boundary to drive through the signed closures, as well as the bus gate on Auckland Road.

In response to concerns about access to the Auckland Surgery, it is proposed to relocate the existing bus gate 150 metres northward, so that the surgery can be reached easily from either end of Auckland Road. Two additional ‘Blue Badge’ disabled person’s parking bays would also be provided on Auckland Road close to the surgery.

- **Option 2: Remain**

In this option, the Low Traffic Neighbourhood would remain as is, with physical closures at all five current locations (Lancaster Road, Warminster Road, Sylvan Hill, Stambourne Way, and Fox Hill) but still allowing passage for people walking and cycling. In this option, the bus gate location would be changed as in option 1 above and the ‘Blue Badge’ disabled parking bays introduced.

- **Option 3: Remove**

The third option is for all the closures and bus gate to be removed, returning streets to through motor traffic as per the situation prior to the Covid19 Pandemic.

5.6 The consultation coincided with the Covid19 Pandemic second nationwide Lockdown. Many businesses were temporarily closed, therefore a separate business specific consultation was conducted after the end of the second Lockdown. This ran until 18 December 2020 with letters sent to local businesses explaining the consultation extension.

5.7 The consultation was publicised in the following ways:

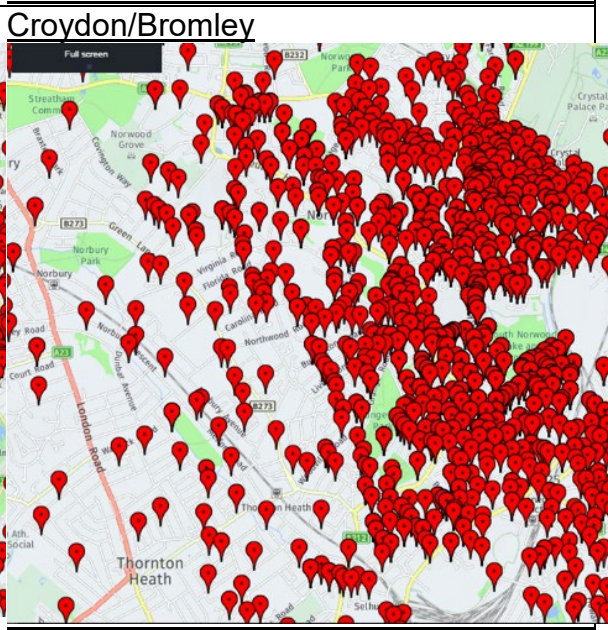
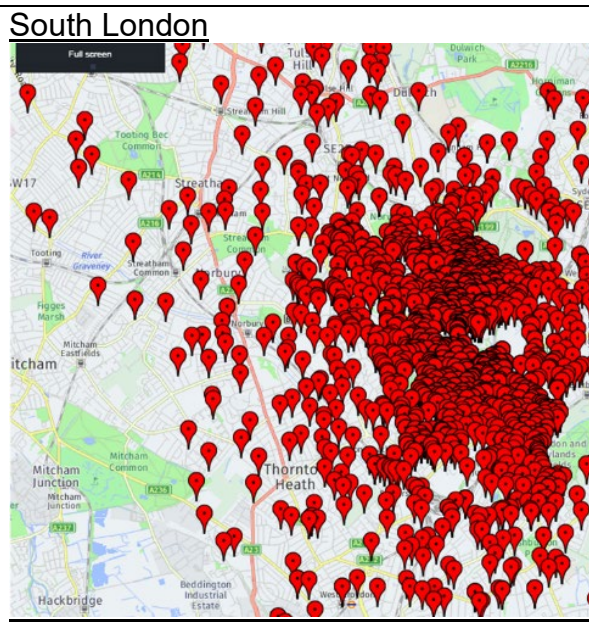
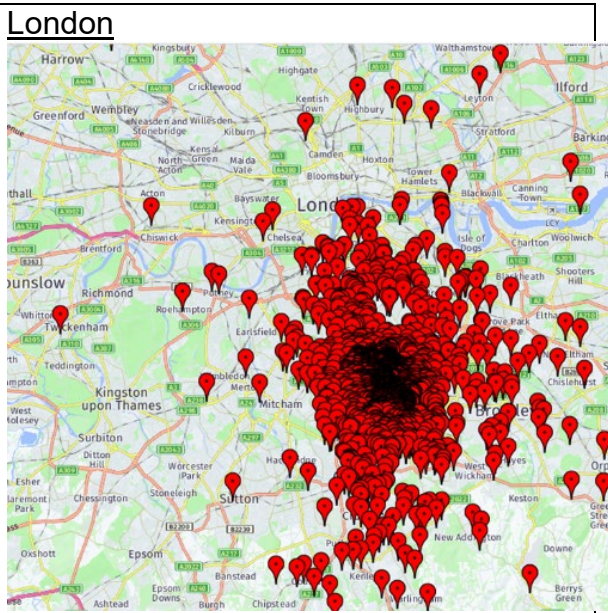
- 6,022 letters approx. with unique codes were delivered to residential properties and within the LTN area and on the A roads bounding it. The purpose of the unique code was validation, to help match responses to addresses.
- 250 street notices were put up on street furniture within the LTN area and on the boundary roads (including in Bromley with the permission of Bromley Council).
- Through the dedicated Streetspace webpages
- Posts informing the public about the consultation were published on the Council’s social media platforms
- A press release

5.8 The letters and notices included a QR code to help people access the consultation via their devices. Letters were delivered, and notices put up in streets within the Temporary LTN and the surrounding A Roads including within Bromley (letters were delivered in Anerley Road as far down as the railway line).

A copy of the consultation letter, street notices and consultation questions are at Appendix 5(a) of this report.

5.9 In total 5,293 people started the survey of which 248 entries were blank and 738 entries had no address information. These 986 entries were disregarded leaving a total of 4,315 responses which were read and analysed. This would represent a response rate of 72% based only on the number of letters delivered. However the public consultation was open to anyone. The QR code was clicked on across the UK and the world. There was a spike in QR code use shortly after the consultation went live. There was a second spike coinciding with the 'Open our Roads' leaflet (Appendix 5(b)) drop. The table below shows the postcode locations of the responders to the consultation.

Table 5.1 Responder post codes at London, South London and Croydon/Bromley levels (area around and including the Temporary LTN)



5.10 Analysis 1 – Do the responders agree with:

- The removal of the scheme
- The keeping of the scheme (with the bus gate moving north)
- The adoption of ANPR at locations throughout (with the bus gate moving north)

Responders were asked to choose between Strongly Agree/ Agree/ Don't Know/ Disagree and Strongly Disagree. The table below demonstrates how the analysis was carried out

	ANPR	Keep	Remove
ANPR			
Keep			
Remove			

Yellow cells indicate where, for example, Remove option received Agree and Strongly Agree responses whilst the Replace with ANPR option and Retain/ Keep options were not assessed

Green cells indicate where both ANPR and Keep were viewed as Agree/ Strongly Agree

Blue cells indicate where both ANPR and Remove were viewed as Agree/ Strongly Agree

Grey cells indicate where both Keep and Remove were viewed as Agree/ Strongly Agree

The survey and analysis were designed to disaggregate based on the location of the responder, with those within the LTN potentially having different views to those living outside, be that in neighbouring post code districts or from much further afield. Separate analysis of the responses and comments received have been undertaken on the following basis:

Of the respondents who reside within the LTN

- Roads that may have experienced either positive or negative change/effects arising from the Temporary LTN (Hamlet Road and Waldegrave Road in Bromley)
- Those within Bromley (Belvedere Road, Cintra Park, Patterson Road and Milestone Road) that have seen an increase in traffic flows
- Those roads to the north of the bus gate where traffic flows have reduced
- Those roads to the south of the bus gate where traffic flows have reduced
- Those roads that are within the LTN but will not have seen an increase or decrease in traffic on their roads

Of the respondents who reside outside of the LTN (including the peripheral roads)

- The Principal roads that immediately border the Temporary LTN (In addition, we were asked to analyse data from those roads that Bromley Council officers felt had been affected but didn't sit within the LTN itself, principally respondents living on Anerley Hill or Anerley Road north of the railway line.)
- Roads in SE19, but not including SE19 addresses within the LTN where a valid identifying code was provided.
- Roads in SE20 but not including SE20 addresses within the LTN where a valid identifying code was provided

- Roads in SE25 but not including SE25 addresses within the LTN where a valid identifying code was provided
- Those responders that lived beyond the post codes outlined above
- Respondents living in the existing through route made up of Seymour Villas, Derwent Road and Selby Road residential access streets in Bromley.

As well as the online survey a number of paper questionnaires were sent to those who didn't have internet access and requested paper copies. Of the 14 paper copies sent out 5 were received back, these are included in the analysis.

Analysis of responses from those living within the Temporary LTN area:

- 5.11 Individual addresses were printed onto the individual letters hand delivered to the households in the area of the Temporary LTN (the area bounded by the A Roads including that in Bromley) and on the bordering A Roads. In response to the 6,022 letters delivered 1,523 responses were received, a response rate of 25%. A few households submitted more than one response. 75% of households / addresses within the Temporary LTN were not sufficiently motivated by the introduction of the Temporary LTN to respond, suggesting they did not have a particular view on the temporary scheme or its future.
- 5.12 Those living within the area of the Temporary LTN that responded, did so in the following ways:

Introduction of ANPR enforced LTN:

- Agree or Strongly Agree with implementing an ANPR solution: 392 (26%)
- Disagree or Strongly Disagree with implementing an ANPR solution: 951 (62%)

Should the scheme remain in its current format?

- Agree or Strongly Agree with the scheme remaining: 236 (15%)
- Disagree or Strongly Disagree with scheme remaining: 1,136 (75%)

Should the scheme be removed in its entirety?

- Agree or Strongly Agree with removing the scheme: 932 (61%)
- Disagree or Strongly Disagree with removing scheme: 345 (23%)

In summary, of those living within the LTN area that responded, 75% disagreed with scheme remaining and 62% disagreed with the implementation of an ANPR enforced LTN. However this only represents the views of people in around 25% households in the LTN area, the majority of people did not provide a response suggesting that they don't have a particular view on this scheme.

5.13 The results of disaggregating responses from within the Temporary LTN based on areas likely to be differently affected by the LTN are below:

Roads that may have seen the scheme negatively or positively (Hamlet Road and Waldegrave Road in Bromley)				Number of responses				53	
Agree or Strongly Agree				Disagree or Strongly Disagree					
	ANPR	Keep	Remove		ANPR	Keep	Remove		
ANPR	24	10	9	ANPR	22	19	3		
Keep	10	14	0	Keep	19	34	5		
Remove	9	0	30	Remove	3	5	19		
Agree to all 3				Disagree to all 3				1No 0No	

Roads within Bromley (Belvedere Road, Cintra Park, Patterson Road and Milestone Road) that have seen an increase in traffic flows				Number of responses				176	
Agree or Strongly Agree				Disagree or Strongly Disagree					
	ANPR	Keep	Remove		ANPR	Keep	Remove		
ANPR	32	9	17	ANPR	124	121	0		
Keep	9	1	1	Keep	121	148	3		
Remove	17	1	141	Remove	0	3	5		
Agree to all 3				Disagree to all 3				1No 1No	

Those roads to the north of the bus gate where traffic flows have reduced				Number of responses				319	
Agree or Strongly Agree				Disagree or Strongly Disagree					
	ANPR	Keep	Remove		ANPR	Keep	Remove		
ANPR	160	53	24	ANPR	125	92	38		
Keep	53	91	3	Keep	92	199	57		
Remove	21	3	104	Remove	38	57	152		
Agree to all 3				Disagree to all 3				2No 8No	

Those roads to the south of the bus gate where traffic flows have reduced				Number of responses				98							
Agree or Strongly Agree				Disagree or Strongly Disagree											
	ANPR	Keep	Remove		ANPR	Keep	Remove		ANPR	Keep	Remove				
ANPR	41	13	6	ANPR	41	33	8	ANPR	41	33	8				
Keep	13	22	1	Keep	33	64	14	Keep	33	64	14				
Remove	6	1	47	Remove	8	14	35	Remove	8	14	35				
Agree to all 3				1No				Disagree to all 3				0No			

Those roads that are within the LTN but will not have seen an increase or decrease in traffic on their roads				Number of responses				877							
Agree or Strongly Agree				Disagree or Strongly Disagree											
	ANPR	Keep	Remove		ANPR	Keep	Remove		ANPR	Keep	Remove				
ANPR	319	74	131	ANPR	444	386	47	ANPR	444	386	47				
Keep	74	132	5	Keep	386	659	97	Keep	386	659	97				
Remove	131	5	561	Remove	47	97	229	Remove	47	97	229				
Agree to all 3				1No				Disagree to all 3				3No			

Analysis of responses from Outside of the Temporary LTN.

5.14 The responses from outside of the Temporary LTN area were disaggregated into:

- A Roads bounding the LTN (except for Anerley Hill/ Road north of the railway line)
- Anerley Hill/ Road north of the railway line
- The remainder of post code SE19 outside of the LTN area
- The remainder of post code SE23 outside of the LTN area
- The remainder of post code SE25 outside of the LTN area
- Streets outside the LTN in Bromley potentially receiving more traffic Seymour Villas, Derwent Road and Selby Road

The results following this disaggregation are:

Roads in SE19, but not including SE19 addresses within the LTN where a valid identifying code was provided.				Number of responses 887			
Agree or Strongly Agree				Disagree or Strongly Disagree			
	ANPR	Keep	Remove		ANPR	Keep	Remove
ANPR	135	60	29	ANPR	639	591	41
Keep	60	108	8	Keep	590	691	35
Remove	29	8	610	Remove	41	35	134
Agree to all 3 5No				Disagree to all 3 10No			

Roads in SE20				Number of responses 189			
Agree or Strongly Agree				Disagree or Strongly Disagree			
	ANPR	Keep	Remove		ANPR	Keep	Remove
ANPR	16	5	7	ANPR	148	139	9
Keep	5	15	14	Keep	139	156	3
Remove	7	14	176	Remove	9	3	22
Agree to all 3 0No				Disagree to all 3 2No			

Roads in SE25				Number of responses 864			
Agree or Strongly Agree				Disagree or Strongly Disagree			
	ANPR	Keep	Remove		ANPR	Keep	Remove
ANPR	107	35	39	ANPR	605	550	39
Keep	35	82	12	Keep	550	662	37
Remove	39	12	662	Remove	39	37	113
Agree to all 3 4No				Disagree to all 3 18No			

Those responders that lived beyond the post codes outlined above				Number of responses 877			
Agree or Strongly Agree				Disagree or Strongly Disagree			
	ANPR	Keep	Remove		ANPR	Keep	Remove
ANPR	165	127	24	ANPR	507	390	109
Keep	127	259	14	Keep	390	442	19
Remove	24	14	469	Remove	109	19	276
Agree to all 3 4No				Disagree to all 3 18No			

The Principal roads that immediately border the scheme				Number of responses 178			
Agree or Strongly Agree				Disagree or Strongly Disagree			
	ANPR	Keep	Remove		ANPR	Keep	Remove
ANPR	23	6	7	ANPR	123	113	7
Keep	6	18	3	Keep	113	141	7
Remove	7	3	123	Remove	7	7	24
Agree to all 3 1No				Disagree to all 3 0No			

Respondents living on Anerley Hill or Anerley Road				Number of responses 14			
Agree or Strongly Agree				Disagree or Strongly Disagree			
	ANPR	Keep	Remove		ANPR	Keep	Remove
ANPR	0	0	0	ANPR	10	10	0
Keep	0	0	0	Keep	10	12	0
Remove	0	0	12	Remove	0	0	0
Agree to all 3 1No				Disagree to all 3 0No			

Respondents living in the potential additional traffic streets made up of Seymour Villas, Derwent Road and Selby Road				Number of responses				19	
Agree or Strongly Agree				Disagree or Strongly Disagree					
	ANPR	Keep	Remove		ANPR	Keep	Remove		
ANPR	1	1	0	ANPR	14	14	0		
Keep	1	2	1	Keep	14	14	0		
Remove	0	1	14	Remove	0	0	1		
Agree to all 3				Disagree to all 3				0No	

Overall analysis of the consultation responses to whether the scheme should remain, be replaced or be removed:

- 5.15 The overall aggregate response to the option to Replace the physical closures implementing the Temporary LTN, with ANPR enforced 'No Motor Vehicle' restrictions and signs was:
- Agree or Strongly Agree with implementing an ANPR scheme: 1000 (23%)
 - Disagree or Strongly Disagree with implementing an ANPR scheme: 2656 (61%)
- 5.16 The overall aggregate response to the option for the Temporary LTN to Remain in its current format was
- Agree or Strongly Agree with the scheme remaining: 735 (17%)
 - Disagree or Strongly Disagree with scheme remaining: 3,056 (71%)
- 5.17 The overall aggregate response to the option to remove the Temporary LTN entirely was:
- Agree or Strongly Agree with removing the scheme: 2896 (67%)
 - Disagree or Strongly Disagree with removing scheme: 998 (23%)

Overall analysis of the consultation responses to specific questions:

- 5.18 In aggregate the response to the individual specific questions were:

Question 1: How do you feel about the scheme when it was first implemented?

Negative	Positive	No Opinion
2968 (69%)	859 (20%)	435 (11%)
Total:	4262	

Question 2: Has the removal of the scaffolding and temporary lights on Church Road made a difference?

Negative	Positive	No Opinion
1050 (25%)	1379(33%)	1807 (42%)
Total:	4236	

Question 3: In July, we made changes to the scheme based on initial feedback - namely installing a bus gate on Auckland Road. How did you feel about the scheme with this change?

Negative	Positive	No Opinion
2,452 (58%)	759 (18%)	1008 (24%)
Total:	4219	

Overall analysis of the consultation responses to specific questions suggests the removal of temporary lights and scaffolding on Church Road had a significant impact on people’s opinion of the scheme. For example the analysis shows that there was a 44 % decrease in the people who perceived the scheme as negative, a 13% increase in people who perceived the scheme as positive and a 31% increase in people who had no opinion as a result of the scaffolding being removed. Nevertheless objectors to the LTN assert that ‘problems have persisted’ since Church Road was fully re-opened.

Furthermore as a result of the changes brought about because of pre-consultation feedback received (namely the introduction of the bus gate) there was an 11% decrease in the number of people who perceived the scheme as negative and an 13% increase in the number of people who had no opinion.

Capturing comments from consultation responses

5.19 The consultation survey contained a number of questions to which a free form comments box was provided for responders to give further information to explain their views. Each of the comments has been read and the two most prevalent views highlighted by each responder has been recorded in the following 15 themes that emerged.

In some cases the responder did not give any comment. Some only made a single comment / raised one issue of concern rather than several, and in the case of only one comment, just that one comment was recorded. In other cases, the responder has raised a large number of concerns, and in these cases, only the two most pressing and often quoted themes have been recorded. The number of times each theme has been mentioned has then been counted to indicate which theme is of greatest concern or highest importance.

Table 5.2 Survey Comments Categorised into the 15 Themes

	Theme	TOTAL	%
1	Quieter streets, better environment for walking and cycling	561	8.00%
2	Less air pollution	98	1.40%
3	Safer streets, improved road safety	300	4.28%
4	ANPR is good idea to allow local access	114	1.62%
5	Lack of consultation before implementation	663	9.45%
6	Too hilly to walk or cycle	52	0.74%
7	Worse environment for local people	572	8.15%
8	More traffic pollution	901	12.84%
9	More congested roads, queues, 'rat running', general traffic issues	2092	29.82%
10	Limited access, increased journey times, distance travelled, diverted traffic	1244	17.73%
11	More dangerous streets	104	1.48%
12	Bad for local businesses	62	0.88%
13	Bus gate / ANPR are money making	106	1.51%
14	Creates problems / delays for emergency services	116	1.65%
15	Access for doctors, nurses and health professionals through bus gate and ANPR	31	0.44%

Two most frequent comments –

29.82% of comments mentioned “More congested roads, queues, ‘rat running’, general traffic issues”

17.73% of comments mentioned “Limited access, increased journey times, distance travelled, diverted traffic

- 5.20 The analysis of comments was disaggregated based on the various geographical areas, to provide an indication of which issues are of most concern and /or importance to those responding from different areas within and surrounding the Temporary LTN and distant from it.

Table 5.3 Categorized Survey Comments by Theme and by Location

	Theme	SE19	SE20	SE25	Not Local Responses	Hamlet Road/Waldegrave Road	Belvedere/ Milestone/ Patterson/Cintra Park	Seymour Villas/ Selby and Derwent Road/	Reduced traffic roads, north of the bus gate	Reduced traffic roads, south of the bus gate	Principal Roads on the periphery of the LTN	Roads within the LTN that have experienced no increase or	Annerley Hill & Road	CSPN Survey	Business TOTAL	%
1	Quieter streets, better environment for walking and cycling	94	14	61	129	13	5	0	112	18	8	107	0	7	568	8.0%
2	Less air pollution	17	2	15	13	8	2	0	16	1	0	24	0	1	99	1.4%
3	Safer streets, improved road safety	6	7	52	105	5	6	0	25	14	7	73	0	4	304	4.3%
4	ANPR is good idea to allow local access	24	2	1	4	0	0	0	55	12	0	16	0	0	114	1.6%
5	Lack of consultation before implementation	132	16	123	55	8	48	1	58	8	29	182	3	2	665	9.4%
6	Too hilly to walk or cycle	15	3	1	16	0	0	0	1	0	6	10	0	0	52	0.7%
7	Worse environment for local people	64	15	296	1	13	42	5	40	3	0	91	2	3	575	8.1%
8	More traffic pollution	150	35	236	137	6	43	7	10	13	83	174	7	5	906	12.8%
9	More congested roads, queues, rat running, general traffic issues	486	103	517	283	22	109	14	82	34	85	347	10	9	2101	29.7%
10	Limited access, increased journey times, distance travelled, diverted traffic	230	71	124	222	17	42	2	120	23	43	348	2	3	1247	17.7%
11	More dangerous streets	28	2	17	13	1	18	1	2	2	7	13	0	0	104	1.5%
12	Bad for local businesses	20	3	2	17	0	0	0	1	2	4	15	0	9	73	1.0%
13	Bus gate / ANPR are money making	25	10	8	26	1	1	0	4	6	3	22	0	1	107	1.5%

14	Creates problems / delays for emergency services	12	8	22	22	2	1	1	11	7	2	27	1	0	116	1.6%
15	Access for doctors, nurses and health professionals through bus gate and ANPR	12	1	4	0	0	2	0	1	2	0	8	1	1	32	0.5%
															7063	100.0%

How representative is the sample population?

5.21 The consultation 'population sample' was influenced by:

- the extent of the Council publicising the consultation;
- publicising of the consultation by others; and
- self-selecting through those receiving publicity, choosing to respond or not.

5.22 Half (2041) of those responding live in a household where there are no children or young people. The age profile of those responding does not match that within the LTN area. Only 6 responses (0.1%) were received from anyone 18 or younger, and 56 (1%) from people 18 to 24 years old. This compares with the population within the LTN area where just under a quarter of the population is below the age of 18.

Figure 5.12 Age Profile of the Responders

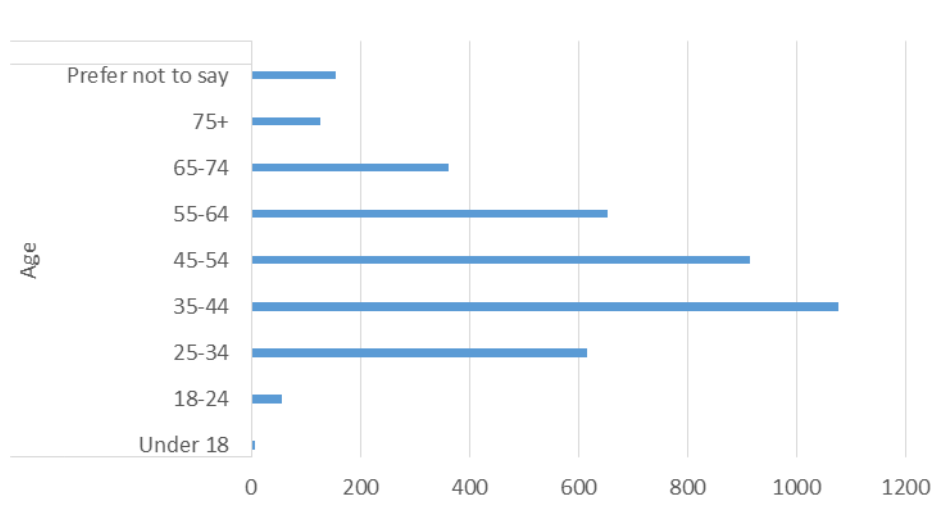
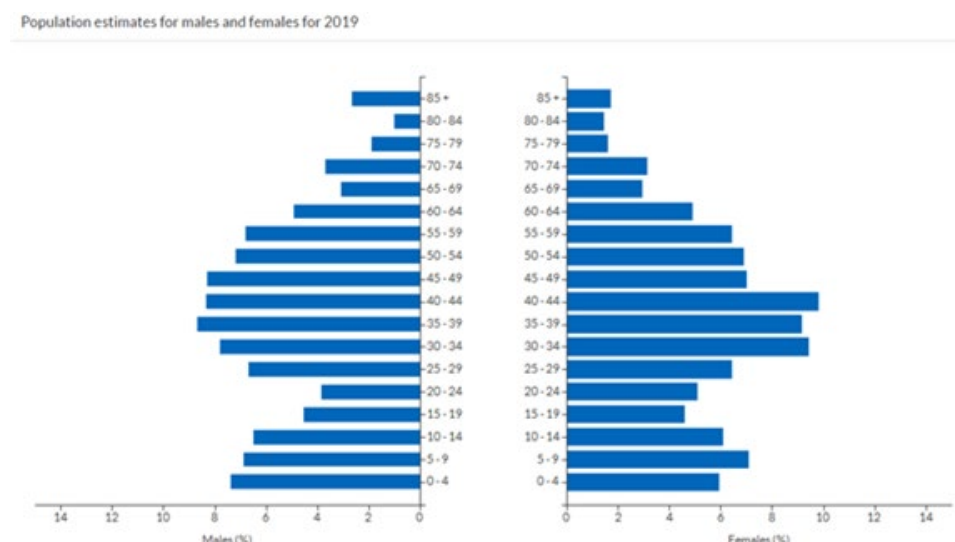


Figure 5.2 Age Profile of Population within the Temporary LTN (see Equality Analysis)



5.23 The ethnic diversity of the population sample does not reflect that within the Temporary LTN.

Figure 5.3 Ethnic Background Reported by Responders

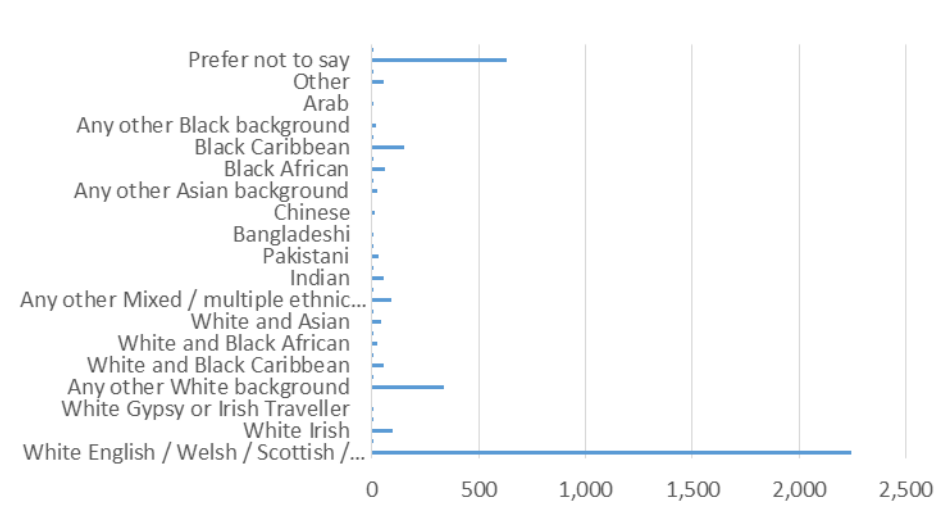
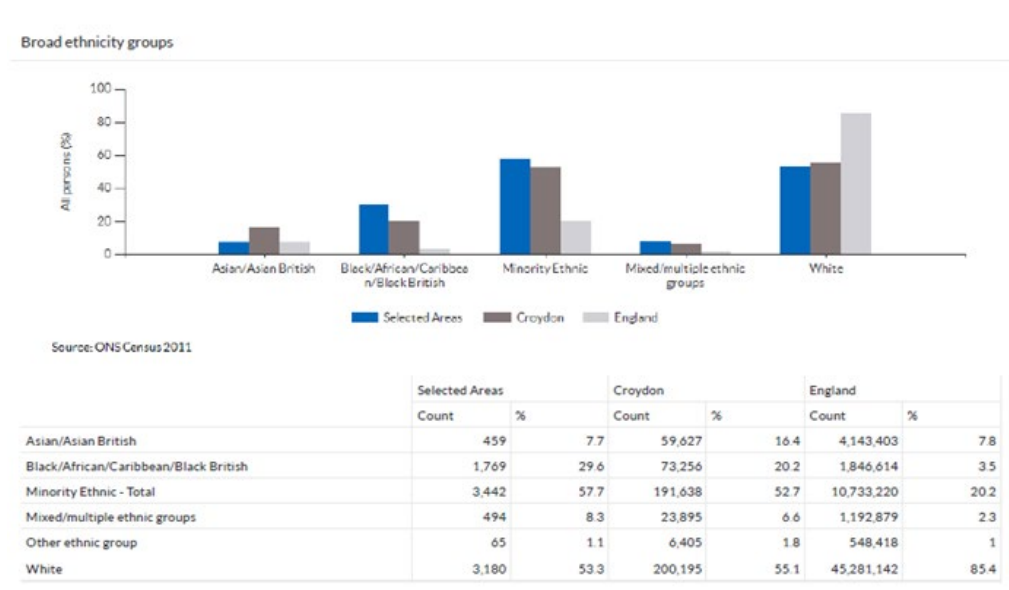
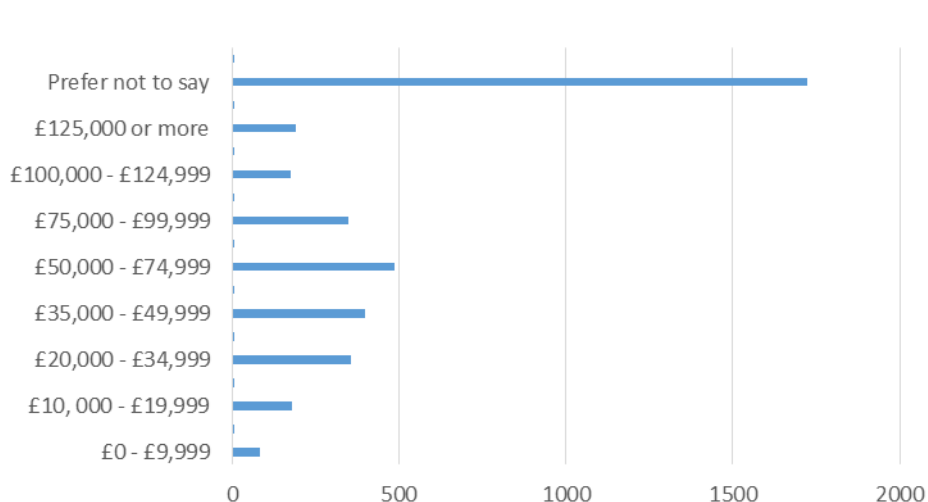


Figure 5.4 Race and Ethnicity of Population Profile within the Temporary LTN, Croydon and England (see Equality Analysis)



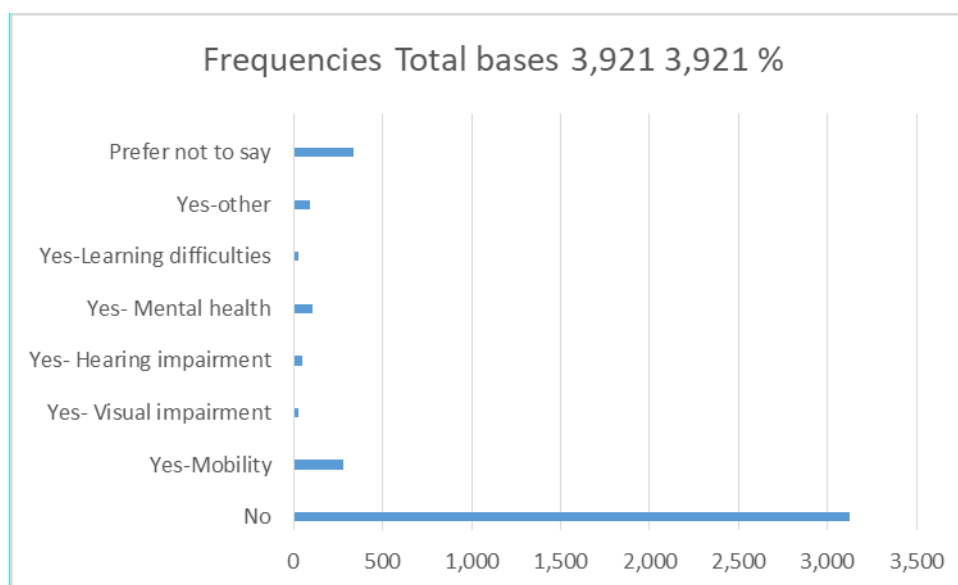
5.24 The Household income of responders appears to be higher than the average within the area of the Temporary LTN, TfL's 'Strategic Neighbourhood Analysis' indicating that the area of the Temporary LTN is amongst the top 20 to 30% most deprived in England

Figure 5.5 Household Income Reported by Responders



5.25 80% of responders reported not having a disability.

Figure 5.6 Responders Reporting Having a Disability



5.26 The gender balance of the responder population appears to be the same as that within the area of the Temporary LTN, with an equal number of female and male respondents who reported their gender. In response to the question ‘If you own a car or motorbike, do you also walk, cycle or use public transport for journeys?’ 3075 responded that they do not own a car.

5.27 Business Consultation Feedback:

Approximately 300 letters were delivered to businesses around the Crystal Palace Triangle and on Anerley Hill in early December, each with a unique code to be used when entering the response on line. 47 responses were received (15% response rate). This suggests that 85% of businesses consulted didn't have

a particular view on the Temporary LTN sufficient to be motivated to respond. This contrasts with the claims made that the Temporary LTN was impacting heavily on the environment with the 'Triangle' and on Anerley Hill and hence on businesses and the economy. However, of those that did respond, the majority of were concerned about additional traffic/congestion around the 'Triangle' attributed to the temporary LTN and this having a negative impact on business. Of the 47 response received, 32 did not use the unique code provided on the letter.

Table 5.4 Summary of Business Responses

How do you feel about the Temporary LTN when it was first implemented?		
Negative or very negative	29	63%
Neutral	5	11%
Positive or very positive	9	20%
No response	3	7%

How do you feel about the Temporary LTN now?		
Negative or very negative	33	72%
Neutral	1	2%
Positive or very positive	9	20%
No response	3	7%

Engagement with the Emergency Services

- 5.28 The Council received specific feedback from the emergency services on the Temporary LTN outlining that they understand the reasons behind its introduction, however their preference would be for the scheme to be implemented using ANPR technology in place of physical barriers, this will ensure they have unhindered access and their response times to emergency call outs is unaffected.

Separate / Additional Responses

- 5.29 Additional responses have been received in the form of:
- "A Briefing to Croydon Councillors" and an "Analysis of the Impact of the LTN Bus Timings" from Open Our Roads. The group is made up of residents who have campaigned throughout for the roads within the LTN to be reopened to traffic, a member of which is the claimant in the Judicial Review of the Temporary LTN
 - A detailed submission by 'Crystal Palace and South Norwood Shape Better Streets'
 - A separate response from Ellie Reeves, MP for Lewisham West & Penge
 - 3 petitions received from the Open Our Roads group

All are included within Appendix 5 to this report.

Engagement and focussed research during the recommended Experimental LTN

- 5.30 In his letter to the Mayor of London on 13 November 2020 (Background document) the Secretary of State explains:

*‘Councils must develop schemes that work for their communities.....
Consultation should include objective tests of public opinion, such as scientific polling, to cut through the noise and passion schemes can generate and gather a truly representative picture of local views. It should engage stakeholders, including local MPs, but it should not be confused with listening only to the loudest voices or giving any one group a veto.’*

What the pre-consultation and this consultation has shown, (as found elsewhere in London and the UK), is that these swiftly implemented LTNs have generated a lot of “noise” and “passion”, generally from those opposed to their principle. The recommended experimental traffic order to implement the Experimental LTN gives the Council the opportunity to undertake more focused research. This to include , but not limited to, traffic surveys, air quality monitoring, close working with both the London Borough of Bromley and Transport for London and additional consultation with the residents of the area, with a particular focus on reaching those residents that chose, for whatever reason, not to engage during this process.

- 5.31 As this report was being written, TfL published ‘The London Streetspace Plan Guidance for engagement & consultation on new Streetspace schemes’ (see Background documents)

6. EQUALITIES IMPACT

- 6.1 The Council, in accordance with its duty under section 1 of the Equality Act 2010, is having due regard to the desirability of exercising its functions in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage;
- 6.2 The Council, in discharging the public sector equality duty in s 149 of the Equality Act 2010 in relation to the decision upon the making of the recommended Experimental Traffic Regulation Order, has due regard to the need to—
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 6.3 The Equality Analysis begins by explaining that the proposed change is a response to:
- historic decisions and current trends.
 - the Mayor of London’s Transport Strategy (in particular the Healthy Streets

- objective)
- the continuing Covid19 Pandemic and to Secretary of State for Transport statements and guidance relating to it, and the Mayor's / TfL's Streetspace Plan for London.

It explains that historic decisions continue to have equality implications. These decisions include parliament in the 1930s allowing streets to be given over to motor vehicles. The consequences of this began to be considered formally in the 1960s when the Ministry of Transport studied the 'Long Term Problem of Traffic in Towns'. The study considered the 'Deterioration of Environment' identifying the issues arising from '*drivers are seeking alternative routes, mainly through residential areas, in order to avoid congested areas on main roads*'. The study highlighted some of the effects this was having relating to 'age', namely children. It reported 'Journey to school. In 1962, 4,287 child pedestrians between the ages of 5 and 9 years were killed or seriously injured'. It proposed traffic levels that are compatible with play in the street and a reasonable quality of environment. It suggested the creation of 'Environmental Areas' (areas free of extraneous traffic) in between the 'Distributor Roads' which would largely need to be rebuilt as major urban highways in order to accommodate the predicted levels of traffic. This approach was clearly not fully taken forward in the UK. The response to the high road casualty rate in children age 5 to 9, has largely been to deny them access to the street, and to curtail their independent mobility.

- 6.4 The Analysis touches on the decision in the early 2000's to turn the Crystal Palace 'Triangle' into a one-way traffic gyratory. It was known at the time that to do so would increase the traffic going around the 'Triangle' by around 50% (not because the scheme was predicted to generate more traffic, rather the same traffic would need to travel along more sides of the Triangle to get to its destination). The strategy to protect the environment within the Triangle from the increased traffic, was to use the traffic signals at each corner of the Triangle to queue traffic on the approach arms to the 'Triangle', rather than within it.
- 6.5 The introduction to the Equality Analysis, highlights the growth in vehicle miles on London's streets, and the growth being entirely on the minor unclassified roads / streets. The Equality Analysis explains that whilst the above changes were not subject to any formal equality assessment, the Equality Analysis relates to a proposed Experimental LTN that aims to address some of the effects arising from past decisions and more recent changes.
- 6.6 The Equality Analysis concludes that the potential effects of the proposed change are greatest in terms of effects on members of a group with the 'Age' related protected characteristic. It reports that around a quarter of the population living within the proposed Experimental LTN are under age 18, and consequently cannot drive. Young adults nationally are much less likely to hold a driving licence. Children are the group whose independent mobility has been most curtailed by past decisions, changes and trends. Through reduced freedom to travel actively and to play in the street, they are at risk of long term health issues. They are also the ones who will experience the greatest impacts of Climate Change, if CO₂ emissions (including those from road transport) are not addressed. At the other end of the age spectrum, the percentage of journeys made by older people in the UK, is very much lower than in many other northern European countries. Children and young people are amongst those considered

most likely to benefit from the proposed scheme, but it can help older people consider returning to cycling or to start cycling, including using E-bikes.

- 6.7 The Equality Analysis reports that the street has historically been where much of the life of the town/city takes place. It was community space which also happened to have a movement function. Lowering traffic levels has the potential for the role of the street as community space to return to a degree, depending on the residual traffic level. This in turn can help foster community cohesion and facilitate the fostering of good relations between members of groups with protected characteristics and others (something difficult to achieve if everyone travels to and from their own home, in their own car).
- 6.8 The Experimental TRO is a means of supporting the achievement of key objectives of the Croydon Council 'Opportunity and Fairness Plan' 2016-2020⁶, in particular addressing inequality around:
- SOCIAL ISOLATION: A CONNECTED BOROUGH WHERE NO ONE IS ISOLATED
 - COMMUNITY COHESION: VIBRANT, RESPONSIBLE AND CONNECTED COMMUNITIES
 - HEALTH: HELP PEOPLE FROM ALL COMMUNITIES LIVE LONGER, HEALTHIER LIVES (in particular 'Create and develop healthy and sustainable places and communities')
- 6.9 The Equality Analysis explains that further equality impact work can and should be undertaken during the operation of the trial scheme and design of anything that might follow it. It recommends that:
- The further analysis should be informed by research conducted during the trial, focused on the experiences of members of those groups with protected characteristics, predicted to be affected by the trial.
 - There should be a dialogue with Dial-A-Ride, Community Transport and SEN Transport operators and with users, to help refine the operation of the trial and the analysis.
 - The Croydon Mobility Forum has not met during the Pandemic. The Forum should be engaged with during the operation of the trial, its views informing the analysis, the operation of the trial and the design and operation of any scheme that might follow the trial.
 - A subsequent Equality Analysis should be carried out before any decision is made on the outcome of and the future for the trial and should be published as part of the documents used in making the recommendation.
- 6.10 Members of the public have suggested that the current Temporary LTN has had the effect of increasing traffic congestion elsewhere, including on the A Roads at the edges of the Temporary LTN. It is suggested that this has worsened air quality at these locations, and these are locations where greater numbers of members of Black and Minority Ethnic groups are living. This is a factor which has been considered in making the recommendation to implement the

⁶ https://www.croydon.gov.uk/sites/default/files/articles/downloads/Opportunity_and_Fairness_Plan.pdf

Experimental TRO. This aspect should be investigated as part of the monitoring strategy for and the further equality impact analysis of the Experimental LTN.

Approved by: Yvonne Okiyo Equalities Manager

7. ENVIRONMENTAL IMPACT

- 7.1 A large part of the feedback received regarding the Temporary LTN expresses concern that it is the cause of increased traffic levels (and hence congestion) elsewhere, principally in the neighbouring A Roads. This leads many to be concerned that increased traffic and congestion is contributing to an increase in harmful locally important air pollutants and a general worsening of environment. These were amongst the two issues of most concern emerging via the consultation (Amongst the comments left when completing the consultation questionnaire, 13% (just over 900) related to there being more traffic pollution).
- 7.2 The approach of central government and the Mayor to reducing emissions of locally important pollutants (and globally harmful CO₂ emissions) from road transport, is to:
- reduce reliance on the private car and other motorised transport including through the encouragement of active travel
 - reduce harmful emissions from the remaining vehicles.
- 7.3 The PJA analysis report at Appendix 4(a), includes images indicating the concentration of locally important air pollutants in 2016 at Crystal Place and South Norwood. These indicate that concentrations of particulate matter, both PM₁₀ and PM_{2.5} were below the UK limits, including at the main A Roads. However, the whole area was above the World Health Organisation guideline limit, particulate matter seemingly being no respecter of boundaries or major or minor streets. In 2016, points within the Temporary LTN area were below or at the UK legal limit (same as the WHO guidelines) for Nitrogen Dioxide NO₂. Some locations on the surrounding A Road exceeded the limit value.
- 7.4 Whilst advances in vehicle propulsion technology are reducing harmful emissions from each vehicle, on Croydon and London's streets there are important trends working against this positive effect. DfT monitoring of vehicle miles driven on London's roads and streets indicates that between 2000 and 2009 traffic on London's vehicle miles fell from 20.3 billion to 18.7 billion⁷ supporting the reduction in total vehicle emissions. From 2009 to 2019, traffic on London's streets has risen to its highest ever at 22.6 billion vehicle miles. Unfortunately the same pattern is observed in Croydon⁸, with traffic levels rising to their highest ever at 0.94 billion vehicle miles in 2019. TfL and local authorities have not been building more principal road capacity. The traffic on London's A Roads and B Roads has been stable / declined slightly since around 2006 / 2007. The increase in vehicle miles has been entirely on London's unclassified roads / minor streets. Traffic on the unclassified minor roads almost doubled from 5.4 billion vehicle miles in 2009, to 9.3 billion miles in 2019, reaching the point where London's minor roads/streets are carrying almost as much traffic as its A Road network.

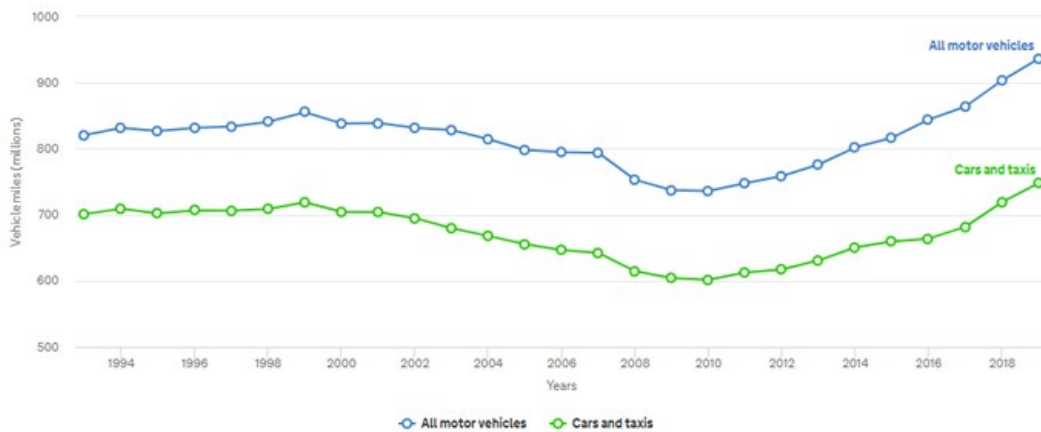
⁷ <https://roadtraffic.dft.gov.uk/regions/6>

⁸ <https://roadtraffic.dft.gov.uk/local-authorities/134>

7.5 When plotting/reporting the changes in vehicle miles at the individual borough level the DfT keeps the data in aggregate for. It does not report separately on A, B and unclassified roads (probably due to the relatively small size of the sample of unclassified roads). However an indication of the number of vehicle miles driven on A Roads relative to other roads in Croydon is available by looking at published figures for CO₂ emissions from roads and streets in Croydon. In 2018, vehicles on Croydon's A Roads emitted 132,000 Tonnes of CO₂, whilst the emissions from vehicles on minor Roads was 129,000 Tonnes⁹, more than in any other London borough. As with locally important pollutants, there are two opposing trends, namely improving vehicle efficiency counteracted by increasing vehicle miles.

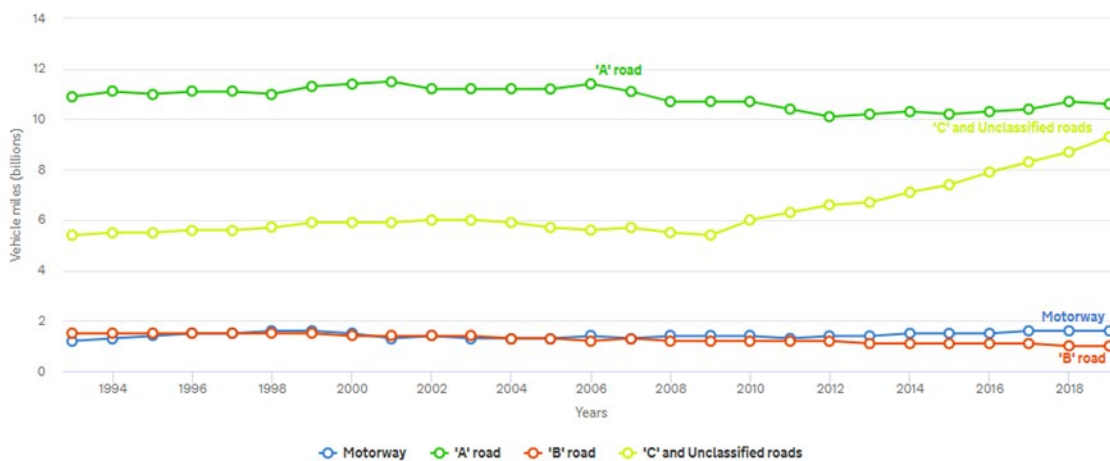
Annual traffic by vehicle type in Croydon

Traffic in Great Britain from 1993 to 2019 by vehicle type in vehicle miles (millions)



Annual traffic by road type in London

Traffic in Great Britain from 1993 to 2019 by road type in vehicle miles (billions)



7.6 The rapid rise in vehicle miles on London's unclassified roads, started just after the 2008 launch of the 'Waze' app. It (and subsequent other apps such as Google Maps) draw in and aggregate real time user data (on speed, location, routes and so on), using it to build out and refine its own maps and to calculate the 'best possible' (in terms of time saving) routes (and re-routes) for its drivers / users. The recommend Experimental LTN is intended to be part of the solution

⁹ <https://naei.beis.gov.uk/laco2app/>

to the ever greater consumption of London streetspace by the car. This consumption (whilst facilitated by vehicle routing apps) is in part a reflection of increasing population and car ownership. Vehicles registered to addresses in Croydon have risen from 148,000 to 159,700 between 2009 and 2019, the increase being almost entirely due to the increase in the number of cars registered (the vast majority of the vehicles registered in Croydon).

7.7 Fortunately the vehicle emission consequences of these trends are being counteracted by action of the Mayor to reduce emissions:

- from the most polluting vehicles by tightening the emissions standards applied through the London wide Low Emissions Zone (action postponed from October 2020 to March 2021 due to the Covid Pandemic).
- in the most polluted parts of London by expanding the Ultra Low Emission Zone in inner London (October 2021)

the combination of which are predicted to bring about significant further reductions in NO₂ concentrations, including at Crystal Palace and South Norwood ('Ultra Low Emission Zone - Further Proposals: Integrated Impact Assessment' (2017) ¹⁰).

Figure 7.1 Annual mean NO₂ concentrations in 2021 with stronger LEZ and Expanded ULEZ

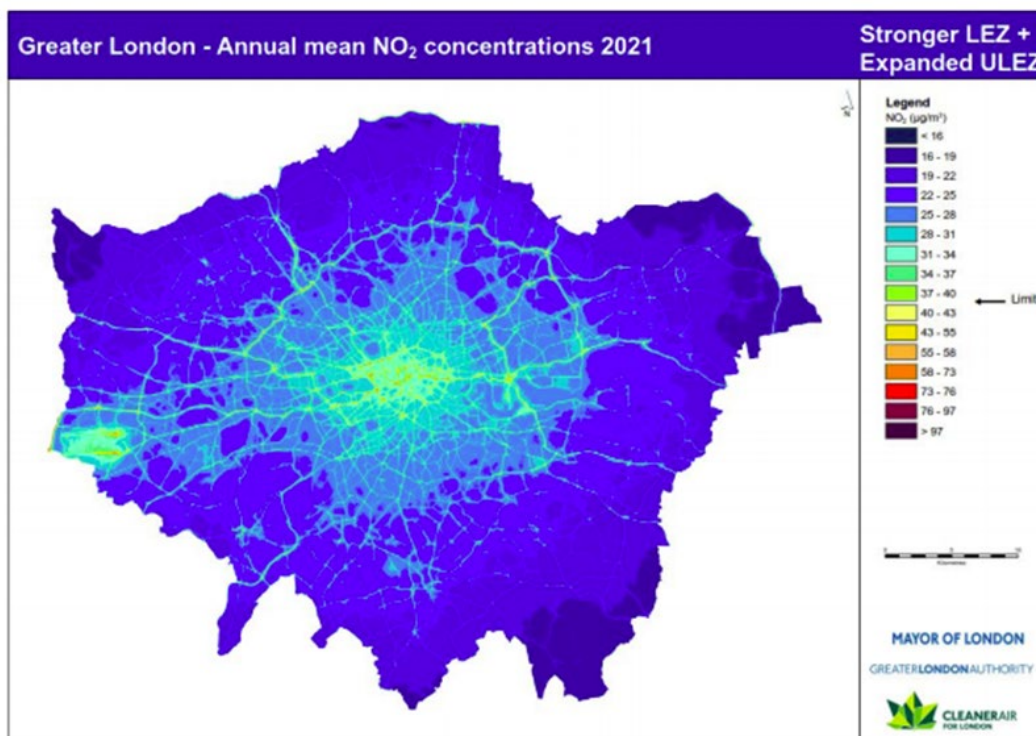


Figure 7.2 Annual mean NO₂ concentrations in 2025 with stronger LEZ and Expanded ULEZ

¹⁰ https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-3b/user_uploads/integrated-impact-assessment.pdf

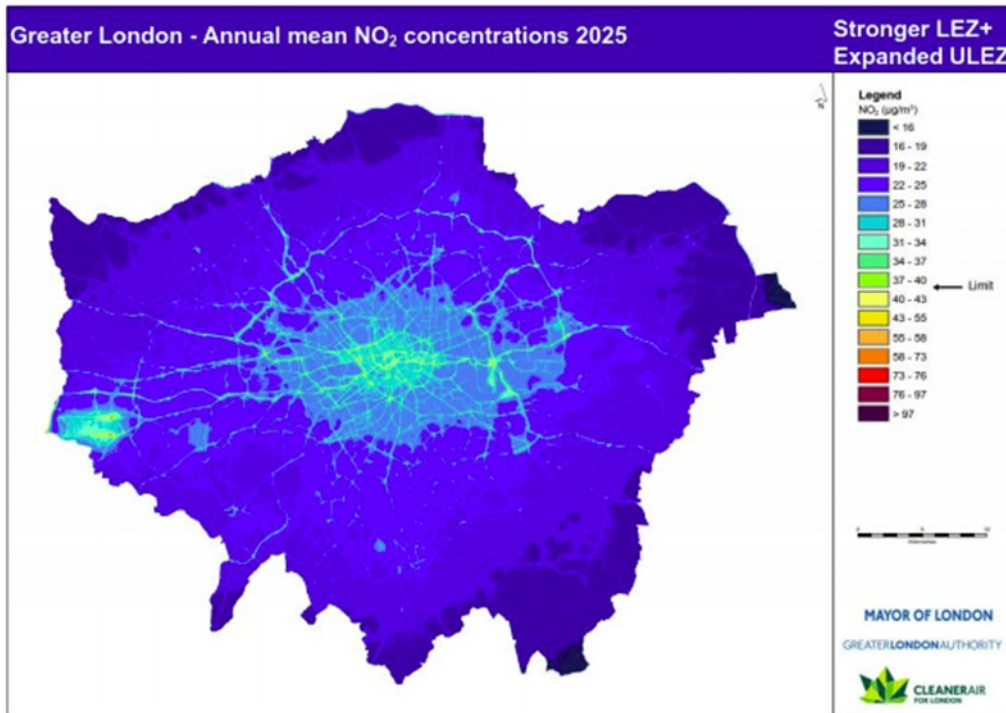


Figure 7.3 Residential receptors exceeding the post LAEI 2025 NO_2 $\mu\text{g}/\text{m}^3$ Contour in year 2021

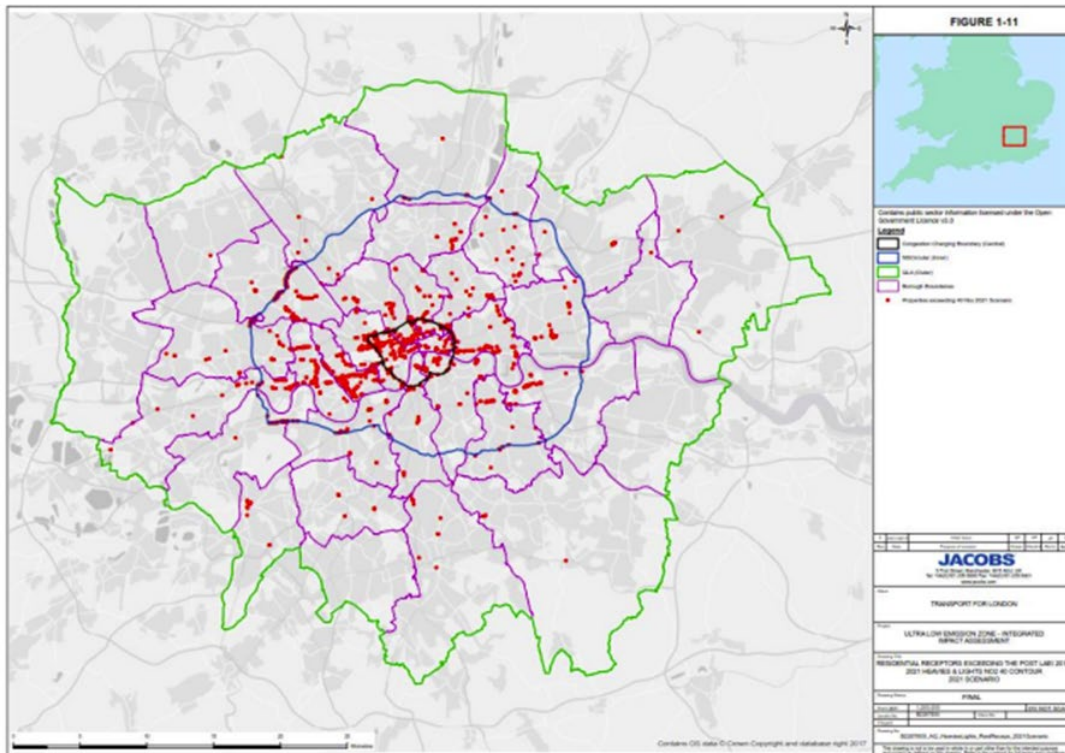
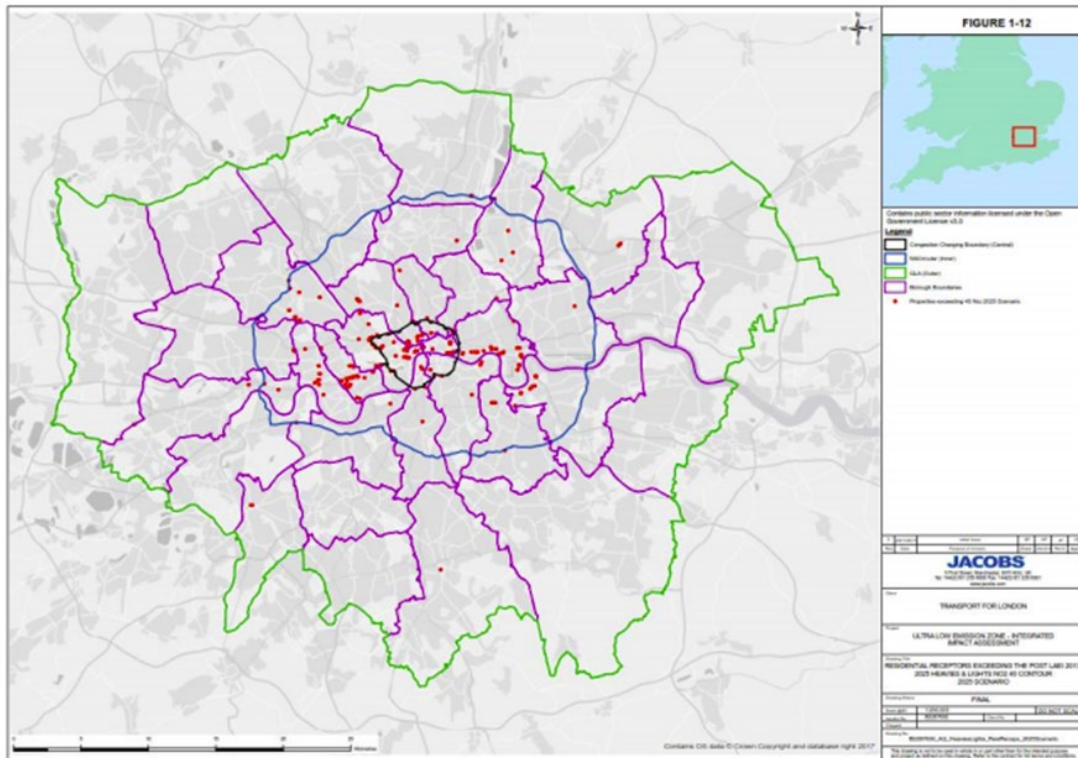


Figure 7.4 Residential receptors exceeding the post LAEI 2025 NO₂ µg/m³ Contour in year 2025



7.8 Whilst:

- neither TfL's nor the PJA assessment of the traffic effects of the Temporary LTN found strong evidence to suggest the Temporary LTN is the cause of traffic conditions on the surrounding A Roads and in the 'Triangle' which might lead to significantly poorer air quality; and
- action is being taken by the Mayor to significantly improve air quality public concern regarding emissions of locally important pollutants from road traffic at Crystal place and South Norwood, is considerable. Assessment of air quality effects should be part of the monitoring strategy for the recommended Experimental LTN, including whether members of Black and Minority Ethnic groups are being differently affected.

8. CRIME AND DISORDER REDUCTION IMPACT

- 8.1 Speeding is possibly the crime that directly kills or seriously injures more people in the UK than any other. In 2018/19 there were 579 police recorded 'causing death or serious injury by dangerous driving' offences in England and Wales¹¹. This compares with a total of 671 victims of murder, manslaughter and infanticide in the same year¹². The Temporary LTN was in large part intended to reduce the road danger in what had been the most heavily trafficked streets in the Neighbourhood, and to reduce the fear of road danger. A key component of the

¹¹ <https://www.statista.com/statistics/303473/death-by-dangerous-driving-in-england-and-wales-uk-y-on-y/>

¹²

<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/homicideinenglandandwales/yearendingmarch2019>

Mayor of London's 'Healthy Streets' and 'Vision Zero' concepts and objectives is to protect people from the crime of speeding and to help reduce the incidence of the crime.

- 8.2 Some of the comments received regarding the Temporary Low Traffic Neighbourhood include concern that less motor traffic in poorly lit streets will lead to more crime against the person and more fear of crime. The Council's street lighting provider is required to light all streets to certain LUX level standards, with no street permitted to drop below a set minimum. Many of the streets within the Temporary LTN previously enjoyed low traffic levels and would continue to do so under the recommended Experimental LTN. The intention of the Low Traffic Neighbourhood is not to significantly reduce the number of people travelling through it, rather it is to change the mode of travel through it. The subject is complex but there is evidence to suggest that higher crime rates correlate with higher traffic flow.
- 8.3 The implementation of the recommended Experimental LTN would offer increased protection to vulnerable road users within the LTN from dangerous driving.

9. HEALTH IMPACT

- 9.1 A significant part of the feedback received regarding the Temporary LTN, relates to air pollution and its effects on human health. Pollutant concentrations for PM₁₀ and PM_{2.5} in and around the Temporary LTNs exceed WHO guidelines. The Mayor is however taking action to reduce private car use, and to reduce emissions through a tightening of the emissions standard for the LEZ and expanding the ULEZ.
- 9.2 A public health crisis facing Croydon relates to inactivity and obesity. The LIP explains that inactivity is having profound health effects and is a major contributory factor to the levels of obesity in Croydon. One in five children in the school reception year is overweight or obese and this rate more than doubles between reception and year 6. The LIP explains that early childhood is a critical time to tackle childhood obesity as children are developing and learning healthy or unhealthy behaviours from a young age. By year 6 (age 10 to 11 years) a greater proportion of children in Croydon carry excess weight than in London or nationally. Two in five children aged 10 to 11 years in Croydon are overweight or obese and this proportion is increasing over time.
- 9.3 For adults the situation is more serious. Two in three adults (62%) of the population are overweight or obese and one in thirty working age people in Croydon have diabetes, a figure which is predicted to increase by 10% by 2025. Amongst older adults (over 65) one in eight are predicted to have diabetes and one in four are obese. Children in Croydon are growing up in a borough where it is normal to be overweight, emphasising why Croydon needs the infrastructure and cultural changes to enable everybody to incorporate exercise into their daily travel routine.
- 9.4 The Mayor's Transport Strategy '*Outcome 1: London's streets will be healthy and more Londoners will travel actively*' is expressed as Londoners doing at least the

20 minutes of active travel they need to stay healthy each day. This is translated into a target in the Croydon LIP. The target is based on the proportion of Croydon residents doing at least 2x10 minutes of active travel a day (or a single block of 20 minutes or more). The Croydon baseline (2013/14-2016/17) is 26% of residents achieving this level of activity. The LIP target is 70% by 2041, with an interim target of 35% in 2021. The recommended LTN, particularly when working in combination with other LTNs, is intended to help people be more active as they travel, helping address the obesity crisis facing Croydon.

10. HUMAN RIGHTS IMPACT

- 10.1 Regard should be had to the provisions of the Human Rights Act. In particular, the provisions of Article 1, of the First Protocol protection of property and Article 8, right to respect for private and family life. In relation to Article 1 some residents have been unable to use the most direct access when driving to their home, following the implementation of the measures creating the Temporary LTN. However, alternative access for motor vehicles has been maintained. Access for those choosing to walk or cycle or use the 410 bus has been aided by the temporary restrictions and direct motor vehicle access would be returned to residents with cars living within the Neighbourhood under the proposed Experimental LTN. Further, the right under Article 1 is qualified rather than absolute as it permits the deprivation of an individual's possessions or rights where it is in the wider public interest. The public interest benefits of the temporary scheme and recommended experimental scheme are outlined within this report. A move to the recommended experimental scheme would see ease of access to their homes by car return to the pre-temporary scheme level for most residents. In summary it is difficult to see how what has been done, or what is proposed, would amount to interference with property so as to constitute a contravention of any person's Article 1 of the First Protocol human rights.
- 10.2 In relation to Article 8, the right to respect for private and family life has a broad interpretation and extends to being in a public place if there is a reasonable expectation of privacy there. This right can be interfered with where lawful, e.g. where it is necessary and proportionate to protect a number of other concerns including public safety and health. It is not considered that the implementation of the temporary restrictions impeded on the right to individuals' right to respect for private and family life, either in public or on private land, nor would the making of the recommended experimental traffic order. Further, the scheme is proposed to contribute to the more general reduction in vehicle mileage, which will enhance public safety and health. Traditionally 'family life' extended out into the street where siblings would play and children walk together to school. The Low Traffic Neighbourhood proposals seek to allow this to happen again.

11. PRE-DECISION SCRUTINY

- 11.1 The preparation of this report and the recommendations within it have been prepared within a very short timescale, necessitated by a series of events. These

include:

- Waiting until the removal of the temporary traffic signals from Church Road before starting consultation on the future of the Temporary LTN
- That consultation coinciding with the second Lockdown and so business specific consultation being held-off until the end of Lockdown
- TfL waiting until after the removal of the scaffolding before undertaking its assessment
- The Judicial Review and the request for stay until 6 Jan whilst a decision on the LTN is taken and Alternative Dispute Resolution is embarked upon with the claimant
- That Alternative Dispute Resolution being initiated in the latter part of December

This resulted in a very constrained window in which to consider the recommendation and prepare the associated report. That window coincided with Christmas. All these matters led to the inability to provide for Pre-Decision Scrutiny.

12. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 12.1 TfL has confirmed £866,000 LIP Corridors funding is available to Croydon Council for the remainder of this financial year. It has also confirmed that £211,000 Active Travel funding is available to Croydon Council for this financial year but with the flexibility of being able to carry funding into next year for delivery, if schemes are committed in this year. The request has been made to TfL to use £120,000 of Active Travel Funding with £37,000 LIP Corridors funding for design, implementation, consultation and monitoring costs arising from the recommended trial project. TfL has agreed to this. The recommendation to make the experimental traffic order is subject to Spending Control Panel agreeing the expenditure of this ring-fenced grant funding.

1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2020/21 £'000	2021/22 £'000	2022/23 £'000	2023/24 £'000
Revenue available				
Expenditure				
Income		Unknown	Unknown	
Effect of decision from report				
Expenditure				
Income				
Remaining budget	0			
Capital available	£157			
Expenditure				
Effect of decision from report				
Expenditure				
Remaining budget				

The effect of the decision

The effect of agreeing and implementing the recommendation would be to incur a cost of £157,000, all of which would be met from ring-fenced grant funding.

The aim of using enforcement cameras is to ensure compliance with the traffic signs/order. The aim is 100% compliance and no Penalty Charge Notices (PCNs) being issued. In reality, compliance will be less than 100% and there will be income derived from PCNs. However, the level of compliance and PCN issuing rate are unknown and so is the likely level of income. The current bus gate on Auckland Road is receiving around 100 contraventions per day with a recoverable rate of around £55 per infringement. It is anticipated that the three closures, covering Sylvan Hill, Stambourne Way and Fox Hill, will experience around half the number of the bus gate collectively, as they are not considered to be on the main desire line through the area. It is also expected that the number of contraventions will decrease as drivers become more aware of the LTN. It is therefore estimated that the Auckland Road bus gate may continue to generate around 70 contraventions per day during the working week and around 50 per day at weekends, and the side road restrictions around 35 per day during the working week and 25 per day at weekends. This rate of contravention should lead to the camera enforced restrictions on Sylvan Hill, Stambourne Way and Fox Hill, repaying the cost of the infrastructure within the first two months after their introduction. However, the Covid19 Pandemic increases the difficulty making income predictions.

2 Risks

The recommendation is to implement the Low Traffic Neighbourhood on an experimental basis. If the Experimental LTN (on balance) is deemed not to be successful, there will be a small cost associated with the removal of the trial scheme infrastructure. If this were to happen, that cost would likely be incurred in 2022/23. The major cost associated with implementing the Experimental LTN is the purchase of the enforcement cameras. If the Experimental LTN is not made permanent, the cameras will still have a significant residual value. There should be discussion with TfL regarding any redeployment or sale of cameras purchased with grant funding provided for this specific trial project.

It is hoped that Bromley Council will work with Croydon Council to mitigate effects likely to arise from the trial in residential access streets in Bromley. Bromley Council agreeing to so work with Croydon would be positive. However, there would be every likelihood that Bromley Council would not expect to use either its own capital funds or LIP funding from TfL for such mitigation. A discussion would need to be held with TfL and Bromley Council as to how these costs (if they were to arise) should be met.

In the following section of this report, the Head of Corporate Law has summarised the criteria set by S121B of the Road Traffic Regulation Act that need to be met if the recommended experimental traffic order is to be made.

Significant delay to making the experimental traffic order is likely to impact on the ability to spend all of the TfL and DfT funding allocated to the project this year. Removal of the Temporary LTN is intended to allow discussion with Bromley Council regarding the recommended Experimental LTN and reduce the risk around making of the traffic order and financial risk potentially associated with delay.

The Covid19 Pandemic adds to the difficulty estimating what income might be derived during the Experimental LTN.

3 Options

The three consulted options are 'Replace', 'Remain', 'Remove'. The effects and risks arising from the first of these are summarised above.

The planters and concrete blocks used to implement the current temporary scheme are considered acceptable for a temporary or trial project. If the Temporary LTN were to be made permanent, then there would be a capital cost for the construction of permanent measures and possible ongoing revenue costs of maintaining trees and other greenery if incorporated into those permanent measures. There would also be the cost incurred relocating the bus gate. The capital costs could potentially be met from TfL LIP Funding. Below is a summary of costs for each of the options considered: remove, replace or retain:

1. Approximate cost of removing each point closure £2,500
2. Approximate cost of replacing the existing temporary point closures with ANPR technology: £157,000
3. Approximate cost of retaining the existing point closures in their current format: £10,000 per site/per year due to ongoing vandalism etc.

4 Future savings/efficiencies

As stated above the objective of enforcing traffic restrictions with cameras is 100% compliance with the restrictions. However, if PCNs are issued and the penalty charges paid, revenue is derived. That revenue income is predicted to be greater than the revenue cost associated with maintaining the scheme infrastructure and enforcing the restrictions, resulting in a predicted surplus income. This surplus will be used in accordance with relevant regulations.

Approved by: Felicia Wright, Head of Finance Place and Resources

13. LEGAL CONSIDERATIONS

- 13.1 Subject to compliance with statutory processes and broader public law principles, Croydon Council is able to make an Experimental Traffic Regulation Order ('TRO') under Section 9 of the Road Traffic Regulation Act 1984 ('1984 Act'), by virtue of the Experimental Order being for the purpose of 'prescribing streets which are not to be used for traffic by vehicles, or by vehicles of any specified class or classes, either generally or at specified times' under Paragraph 2 of Schedule 1 and Section 6 of the 1984 Act. The Experimental TRO must extend for no longer than 18 months.
- 13.2 The Order may be made subject to compliance with the procedure set out in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 ('1996 Regulations'). Whilst statutory consultees are listed at Regulation 6 of the 1996 Regulations, there is no statutory requirement for public consultation. For the purposes of an experimental order, the Council is not required to publish a notice of intention or consider objections prior to making the TRO. Croydon Council will be obliged to consider any such objections at the point of a determination as to whether the Experimental LTN becomes permanent.
- 13.3 Croydon Council must publish a notice on making in relation to the Experimental TRO not less than seven days prior to it coming into force. The notice must include the following statements at Schedule 5 of the 1996 Regulations:
- 1) that Croydon Council will be considering in due course whether the provisions of the experimental order should be continued in force indefinitely
 - 2) that within a period of six months –
 - a. beginning with the day on which the experimental order came into force or
 - b. if that order is varied by another order or modified pursuant to section 10(2) of the 984 Act, beginning with the day on which the variation or modification or the latest variation or modification came into force,any person may object to the making of an order for the purpose of such indefinite continuation
 - 3) that any objection must-
 - a. be in writing
 - b. state the grounds on which it is made; and
 - c. be sent to an address specified for the purpose in the notice making.
- 13.4 In addition to the statutory requirements, broader administrative law and duties ought to be considered. These have been substantively addressed within this report.

- 13.5 Under S121B of the 1984 Act, Croydon Council may not implement a TRO if it will, or is likely to affect a GLA Road, Strategic Road or a road in another borough unless it has notified TfL and the London Borough (as relevant) and the proposal has either (a) been approved; (b) received no objection within one month; (c) any objection has been withdrawn; or (d) GLA has given its consent after consideration of the objection.

Approved by: Sandra Herbert Head of Litigation and Corporate Law for and on behalf of Jacqueline Harris-Baker the Council Solicitor and Monitoring Officer.

14. HUMAN RESOURCES IMPACT

- 14.1 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.

Approved by: Jennifer Sankar, Head HR Place for and on behalf of the Sue Moorman, Director of Human Resources

15. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

Reasons for an Experimental rather than Permanent Scheme

- 15.1 There has been considerable public concern expressed regarding the perceived effects of the Temporary LTN. In the light of that concern, a recommendation to implement a permanent scheme of a similar nature at this location is not proposed. Rather a trial, the effects of which can be monitored and assessed, is recommended. Much of the concern expressed relates to the view that the Temporary LTN has led to increased congestion elsewhere, with resulting environmental effects impacting certain groups to a greater extent. An experimental traffic order is time limited and allows a traffic management scheme to be 'modelled in reality', allowing a realistic and more accurate assessment of effects. An experiment allows some further adjustment and improvement of measures whilst it is running. If deemed unsuccessful the experiment can be halted and / or not made permanent.
- 15.2 Engagement on the future of the Temporary LTN was broad (reaching a good many people, many living a considerable distance from the LTN) but was not deep. In the Covid19 Pandemic it was difficult to reach out to members of groups mostly likely to be positively or negatively affected by the measures. The Experiment is the opportunity to reach out to these groups and include their experiences within the monitoring and assessment.

Reasons for pursuing a scheme following the removal of the Temporary LTN

- 15.3 In making the recommendation to make the experimental traffic order, consideration has been given to the matters in this report and in particular:
- i) **The expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities.**
The recommended Experimental LTN is intended to facilitate the expeditious,

safe and convenient movement of pedestrians and people on bikes, especially when linked with other similar measures. The trial would also lessen the conflict previously arising between traffic movement and parked vehicles in Auckland Road and Southern Avenue. It would allow for the convenient movement of vehicles belonging to residents of the area within the Experimental LTN, exempt from the experimental restrictions on vehicle movement.

ii) **Access.**

Access including that for motorised traffic, would be maintained to all residential and other properties, albeit access routes for motorised traffic (except for emergency services vehicles and vehicles belonging to residents living within the exemption permit area holding exemption permits) will change (compared to prior to the Temporary LTN), which may cause inconvenience to some. The resident permit exemption and the proposed relocation of the bus gate in Auckland Road by the Auckland Road Surgery, are intended to minimise inconvenience.

iii) **Amenity.**

All local amenities remain accessible and their accessibility by walking and cycling would be improved, although for some the route to access these amenities may change. The area will benefit from the significant reduction of through movements of motorised traffic, and thereby provide a significant improvement to the amenity of the area. Streets will be better able to return to their historic role as places for play, places for the community to share, enjoy and engage. The amenity value of many streets would be much increased.

iv) **Air Quality.**

By creating safer more pleasant space for people to walk and cycle short journeys, the majority we all make, the Experimental LTN aims to reduce reliance on / use of the private car. Many have suggested that the Temporary LTN led to a worsening of air quality on the A Roads surrounding it. The PJA analysis and that of TfL suggests that effects of the temporary LTN are not that significant compared with the effects of the temporary traffic lights in Church Road. The Mayor is taking action that is predicted to bring about further improvement in air quality. However, there is strong public concern regarding air quality and assessment of air quality effects should be an important element of the trial, the results of which would be a factor in any decision as to whether or not to make the trial permanent.

v) **Passage of Public Service Vehicles.**

Removing through motor traffic from Auckland Road, Lancaster Road and Southern Avenue will have a powerful 'bus priority' effect, improving both bus journey times and reliability on this section of the 410 bus route. It would also make the walk to and from the bus stops within these streets safer (in terms of Road Danger / Risk) and more pleasant. The Open our Roads assessment of bus journey times 'The LTN's impact on congestion' has been considered (Appendix 5 (d)), as has TfL's own assessment (Appendix 4(b)). TfL's assessment suggests that the Temporary LTN did not have a significant effect on bus journey time for those services using the surrounding A Roads compared to the effect of the temporary Traffic lights in Church Road. The

TfL analysis indicates that on the Anerley Hill/Road corridor journey times have decreased in both directions since the removal of the temporary signals. The picture is also mixed with bus journey times on the likes of Penge Road, having improved east bound since the start of the first Lockdown, weekly averages having been consistently lower than the baseline average, but the opposite being the case west bound. Continuing to monitor effects on bus services with TfL will be an element of the Experimental LTN assessment.

vi) **Continuing Pandemic.**

The Secretary of State for Transport's statement and associated Statutory Guidance (last updated on 13 November 2020), continue to require councils to cater for significantly increased numbers of cyclists and pedestrians, and making it easier for them to create safer streets is a relevant consideration. The updated statement and Guidance have an added emphasis on monitoring and consultation, both of which would be elements of the recommended Experimental LTN.

vii) **Strategy and Policy.**

The LTN (when combined with others) is a major means of delivering objectives in the Mayor of London's Transport Strategy including the Healthy Streets objective. It supports delivery of the 'Top Priority' cycle corridor identified by TfL from Crystal Palace to the Town centre. It is an important means of delivering on commitments in the Croydon LIP and addressing matters of importance, specifically health, climate change and social inclusion.

viii) **Important Findings through Feedback and Consultation**

The Equality Analysis relating to the recommended Experimental LTN, draws on the 1963 Ministry of Transport study into the 'Long Term Problem of Traffic in Towns'. The study considered the 'Deterioration of Environment' identifying the issues arising from '*drivers are seeking alternative routes, mainly through residential areas, in order to avoid congested areas on main roads*'. The study highlighted some of the effects this was having relating to 'age', namely children. It proposed traffic levels that are compatible with play in the street and a reasonable quality of environment. It looked into the future to the era in which we now live and the traffic levels we see today. It suggested the creation of 'Environmental Areas' (areas free of extraneous traffic, and what we are now calling LTNs) in between the 'Distributor Roads'. It envisaged the Distributor Roads (main streets and high streets) would be rebuilt as major urban highways in order to accommodate the predicted levels of traffic. This rebuilding was generally resisted and not taken forward, with the exception of places such as the Croydon Town Centre. Having not rebuilt our high streets and main streets as urban highways, the rising demand for car travel is being accommodated by different means in 21st Century London. Department for Transport (DfT) monitoring of vehicle miles driven on London's roads and streets indicates a dramatic increase over the last decade. The start of the increase coinciding with the launch of 'Waze' and other driver route finding apps / navigational devices. As London's principal road network has not been rebuilt to provide additional capacity, it is the unclassified minor roads and streets that have been both accommodating and facilitating the rising demand to drive. London's minor street network now carries almost as many vehicle miles as its A Road network.

The attempt to create an 'Environmental Area' or LTN has given rise to considerable anger. This is perhaps illustrated through having asked in the consultation whether they agreed or disagreed that conditions had improved with the removal of the temporary traffic signals from Church Road. Over a thousand respondents either strongly disagreed or disagreed. The geographical spread of those responding to the consultation and anti LTN petitions (response from across the country, across London and across south London) illustrate the decision to be made. Should Auckland Road, Lancaster Road and Southern Avenue be given back to acting as single function distributor roads meeting the demand for longer distance car journeys, or be helped to return to being multi-functional streets, streets being the place where historically much of the life of cities and communities has taken place?

16. OPTIONS CONSIDERED AND REJECTED

16.1 The options considered and rejected are:

- 1) removing the Temporary LTN and not replacing it with anything
- 2) removing the Temporary LTN and replacing it with a Permanent LTN

17. DATA PROTECTION IMPLICATIONS

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

YES

17.2 The collection and analysis of the consultation responses involved the processing of personal data. Further consultation analysis, surveying and monitoring during the Experimental LTN is likely to involve the processing of personal data.

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

YES

DPIAs were undertaken and published for the online consultation on the future of the Temporary LTN, and the consultation survey of businesses. Further DPIAs will be undertaken when the further consultation analysis, surveying and monitoring during the Experimental LTN is being specified.

Personal data were submitted in the form of name and address information from three online petitions. The address information was used to plot the home locations of those signing the petitions and was then deleted and not saved.

Approved by: Steve Iles, Director of Public Realm

CONTACT OFFICER: Ian Plowright, Head of Transport x62927

BACKGROUND PAPERS

Cycling Skills Level Audit _ Croydon Cycle Network Review

Letter from Secretary of State for Transport to Mayor of London 13 November 2020

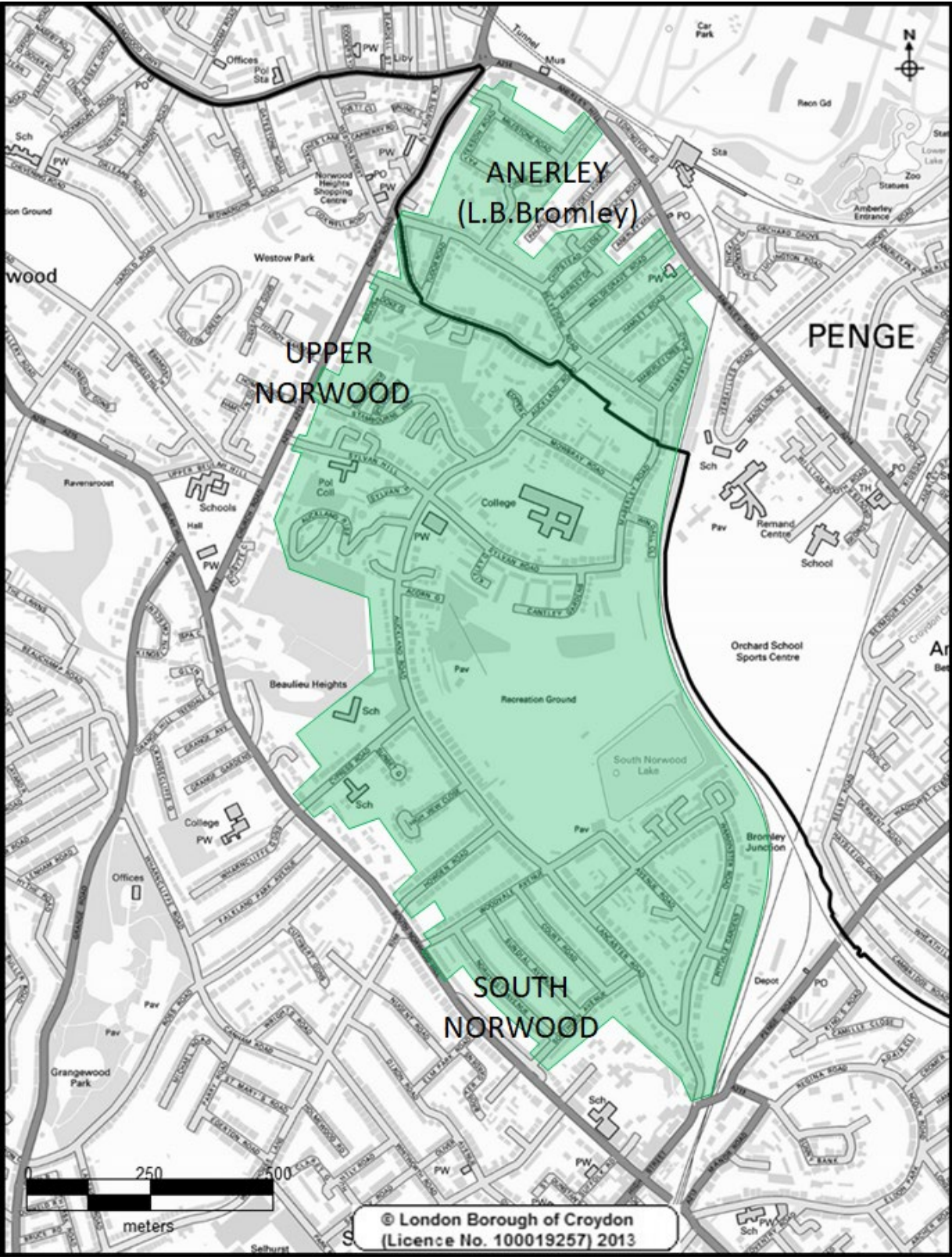
Email from Karen Proctor, Chairperson, United Cabbies Group, with attached letter and other attachments

The London Streetspace Plan Guidance for engagement & consultation on new Streetspace schemes, TfL, December 2020

APPENDICES TO THIS REPORT

1. Location of Exemption for Residents of Bromley and Croydon
2. Further Policy Background to the Temporary LTN
- 2(a) 'FOCUS ON: THE HEALTHY STREETS APPROACH' Mayor's Transport Strategy pages 36 and 37.
3. Further Background to the Evolution of the Temporary LTN
4. Analysis of Traffic Effects
 - 4(a) PJA consultants' analysis
 - 4(b) TfL analysis
5. Consultation
 - 5(a) The consultation letter, street notices, plans and consultation questions
 - 5(b) Open our Roads leaflet
 - 5(c) Main consultation (non-business) response data set
 - 5(d) Separate / Additional responses
 - 'Briefing to all Croydon Cllrs' Open Our Roads.
 - Open Our Roads 'The LTN's impact on congestion A data supplement for TMAC based on TfL's record of local bus journey times'
 - 'SHAPE BETTER STREETS' Submission by Crystal Palace and South Norwood Shape Better Streets
 - Letter from Ellie Reeves MP
 - 5(e) Petitions
6. Further Information on Environmental Impacts Including Air Quality
7. Health Impacts Further Policy Information
8. Equality Analysis

Location of Exemption for Residents of Bromley and Croydon



Further Policy Background to the Temporary LTN

Background

- 1.1 The Temporary LTN was implemented ‘reactively’ in stages, as a response to the Covid19 Pandemic. The Temporary LTN also has the potential to address matters of importance, including furthering the Mayor of London’s ‘Healthy Streets’ objective. The Temporary LTN is an example of where rapid action to respond to the Pandemic (asked of local authorities by the Secretary of State for Transport) meets policy (primarily in the form of the Mayor of London’s Transport Strategy and the Council’s statutory plan to implement that Strategy within the Borough). This appendix sets out the policy and Pandemic background to the Temporary LTN, and policy considerations to be had in determining its future.

Mayor of London’s Transport Strategy and the Croydon Local Implementation Plan

- 1.2 The Greater London Authority Act 1999 requires the Mayor of London to make a Transport Strategy. It requires each London local authority to make a plan (a Local Implementation Plan (LIP)) to implement the Strategy within its area. The Mayor has to approve each local authority’s LIP. To do so he must be satisfied that:
- a) the LIP is consistent with the transport strategy,
 - b) the proposals contained in the LIP are adequate to implement his Strategy, and
 - c) the timetable for implementing those proposals, and the date by which those proposals are to be implemented, are adequate for those purposes.

The Act ‘presumes’ the local authority will implement its LIP. If the Mayor considers a local authority to be failing or likely to fail to implement proposals in the LIP, the Act enables the Mayor to exercise the powers of the local authority to implement the LIP, and charge the local authority for doing so.

- 1.3 Section 159 of the Greater London Authority Act 1999 authorises Transport for London (TfL) to give financial assistance to any body (including local authorities) for expenditure incurred doing anything conducive to the provision of safe, integrated, efficient and economic transport. TfL has used this power to provide funding (‘LIP Funding’) to local authorities to support the implementation of their LIPs (with the exception of the first half of the current financial year).
- 1.4 Published in 2018, the Mayor’s Transport Strategy uses the ‘Healthy Streets Approach’ to prioritise human health in planning the city. The Mayor wishes to change London’s transport mix so the city works better for everyone. Three key themes are at the heart of the Strategy:

Healthy Streets and Healthy People

- creating streets and street networks that encourage walking, cycling and public transport use to reduce car dependency and the health problems it creates. The Strategy Vision is expressed as:

'Changing the transport mix

- *The success of London's future transport system relies upon reducing Londoners' dependency on cars in favour of increased walking, cycling and public transport use. This simple aim of a shift away from the car will help address many of London's health problems, by reducing inactivity and cleaning up the air. It will help to eliminate the blight of road danger. It will limit the city's contribution to climate change and help to develop attractive local environments. It will reconnect communities by creating places where people are prioritised over cars.....'*

Policy 1 of the Strategy states:

- *'The Mayor, through TfL and the boroughs, and working with stakeholders, will reduce Londoners' dependency on cars in favour of active, efficient and sustainable modes of travel, with the central aim for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041.'*

1.5 On 15 October 2018, Cabinet approved the draft Croydon LIP (Decision ref: 81/18) core components, including draft LIP Objectives:

'1. Croydon will look to reduce the number of local in-borough car journeys by creating a transport network that prioritises walking, cycling and public transport.

2. Croydon will create healthy streets and neighbourhoods that encourage walking and cycling, where traffic volumes and speeds are low.'

The officers' report to Cabinet explained:

'4.9 The following programme areas and projects being proposed in Croydon's draft LIP3 are detailed below:

- *Healthy Schools Neighbourhoods – this will be a holistic approach to tackling the school run and encouraging walking and cycling to and from school whilst also helping all in the neighbourhood make local journeys on foot and by bike. It will include a package of measures such as school pedestrian zones, bikeability training, school safety schemes, neighbourhood traffic reduction schemes and behaviour change measures, all focused upon a cluster of schools in the same neighbourhood at the same time. Two areas that have been identified as having clusters of schools suitable for piloting the concept are Broad Green and Upper Norwood.'*

1.6 The consultation draft LIP was published in December 2018, containing proposals for *'Healthy Schools Neighbourhoods'* including at Upper Norwood where it was proposed *'Working with schools and the neighbouring communities to develop and deliver 'Healthy Schools Neighbourhoods' in which it is easier and more enjoyable for all to move around on foot and on bike'*.

1.7 The consultation on the draft LIP included an online questionnaire to which there were just under one thousand responses. In summary, the results were:

- 86% of respondents agreed that traffic levels are too high in Croydon.
- 44% of respondents agreed that traffic speeds are too high, with 37% disagreeing, 19% were not sure.
- Less than 5% agreed that the street environment encouraged them to cycle, whilst 77% disagreed, with over 52% disagreeing strongly.

- Over 55% agreed that children should be able to play in residential streets, 26% disagreeing.
- 74% stated that they are concerned about air quality.
- 72% agreed that traffic levels need to be lower.
- 40% agreed they would cycle more if conditions were right, with 43% disagreeing.
- 64% stated they would use public transport more if it was convenient.
- 61% would travel by car less if the alternatives were better.
- 78% agreed that less vehicles would mean better air quality.

1.8 The draft LIP proposed both ‘Low Traffic Neighbourhoods’ and ‘Healthy Schools Neighbourhoods’. The emphasis shifted onto the latter in the finalised LIP. The term ‘Low Traffic Neighbourhood’ contains a clear objective. It was felt that ‘Healthy Schools Neighbourhood’ was a more appropriate title if engaging with residents and other stakeholders with an open and receptive mind on issues and principles, before moving to objectives and then measures to achieve those objectives.

1.9 The short to medium term delivery objectives and proposals of the LIP include:

‘Work with local residents to reduce external through traffic in residential areas using the Low Traffic Neighbourhoods principles’,

and the LIP ‘Three-year indicative Programme of Investment’ explains:

‘3.8.3 Consultation and early engagement with key stakeholders identified that traffic dominance and the fear of road danger were key factors in why people in Croydon were not walking or cycling more often. Stakeholders highlighted particular concerns around speeding vehicles, dangerous driving and lack of priority for pedestrians or dedicated infrastructure for cyclists. Discussions with both internal and external stakeholders identified that the school run and associated vehicle trips were key causal factors for congestion and high car trips in the Borough, and should be an area of intervention that is prioritised.’

The LIP also includes a map of the ‘Croydon Cycle Route Network’ which includes ‘Existing secondary cycle routes’ amongst which are shown Auckland Road, Lancaster Road and Southern Avenue. These are on the old/historic London Cycle Network which the Council aims to keep signed within Croydon.

1.10 At its September 2019 meeting, Cabinet agreed (Decision ref:75/19) the submission to be made to TfL for 2020/21 funding to support implementation of the LIP. This included £300,000 for Healthy Schools Neighbourhoods pilot areas including Broad Green and Upper Norwood/Crystal Palace. Due to the Covid19 Pandemic and the resulting effect on TfL’s Finances, this LIP funding was not provided.

'FOCUS ON: THE HEALTHY STREETS APPROACH' Mayor's Transport Strategy pages 36 and 37.

A new type of thinking is required to put into practice the theory of reducing car dependency and increasing active, efficient and sustainable travel. It requires an understanding of how Londoners interact with their city and what defines their quality of life, with particular attention to the streets where daily life plays out.

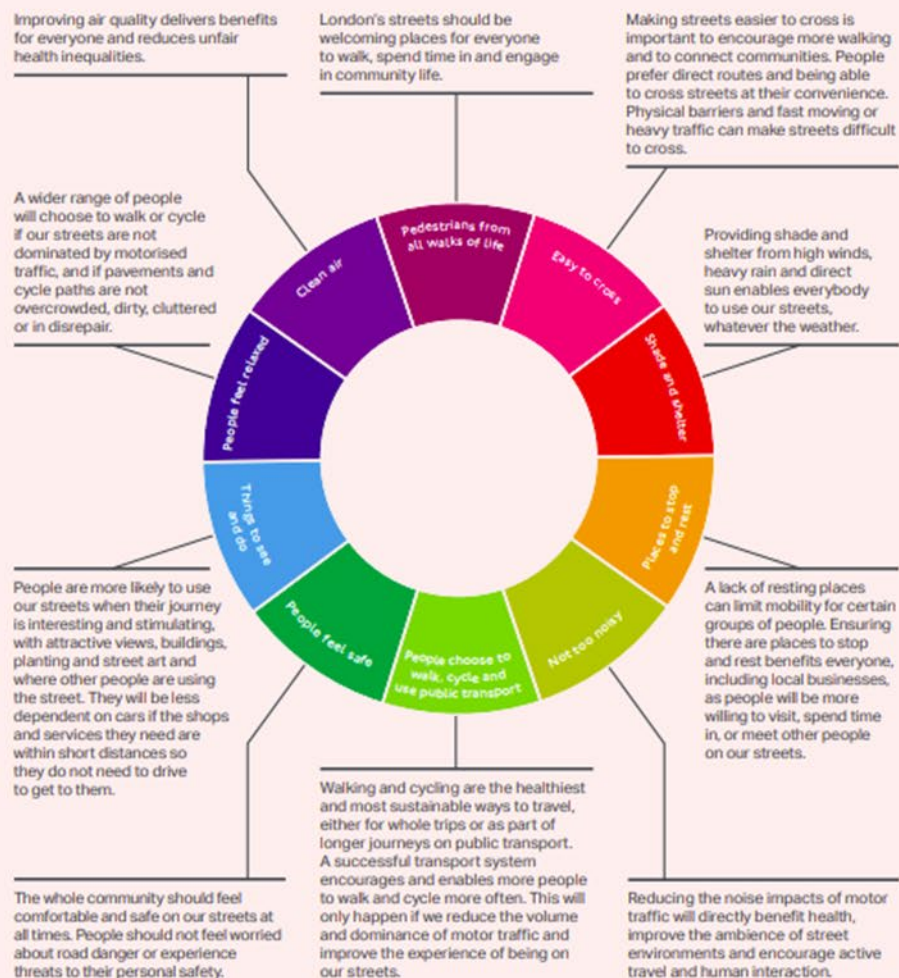
Whatever mode of transport Londoners use, the quality of the experience of using London's streets helps to define the quality of their journey. Eighty per cent of Londoners' trips are entirely on streets⁵, and all Tube and rail journeys rely on good street access to stations. A good street experience is therefore key to providing attractive public transport options of whatever mode.

The wider role streets play in virtually every aspect of London life also provides an enormous opportunity to use the Mayor's strategy for transport to improve Londoners' broader experience of their city. Streets are where Londoners spend their time and meet other people – they make up 80 per cent of the city's public space. They are places where people live, shop and work, where children play, where communities connect and where

businesses can thrive. The experience of being on London's streets is particularly important for older people, the very young, disabled people and those living on lower incomes, who disproportionately feel the negative impacts of living in a car-dependent city. Improving public transport and assisted transport services for older and disabled people will help a wider range of people to become less car dependent, and improving streets to increase active travel levels, reduce road danger, improve air quality and reconnect communities will be vital in reducing unfair health inequalities.

The Healthy Streets Approach provides the framework for putting human health and experience at the heart of planning the city. It uses ten evidence-based indicators, shown in Figure 3, to assess the experience of being on our streets. Good performance against each indicator means that individual streets are appealing places to walk, cycle and spend time. Improvements against all the indicators across the city's streets will radically transform the day-to-day experience of living in London, helping to fulfil this strategy's overall aim of creating a better city for more people to live and work in.

FIGURE 3: THE TEN HEALTHY STREETS INDICATORS



Source: Lucy Saunders

5 Improving the health of Londoners – transport action plan, Transport for London, tfl.gov.uk, February 2014

Further Background to the Evolution of the Temporary LTN

The Covid19 Pandemic and the Evolution of the Temporary LTN

- 1.1 In the latter part of 2019, officers began engaging with, and via, Cypress School on the notion of a Healthy School Neighbourhood, including with residents of Southern Avenue.
- 1.2 On 18 January 2020, Steve Reed MP, The Croydon Council Cabinet Member for Environment, Transport and Regeneration, and the Council's Head of Transport, attended a public meeting called by Croydon Living Streets at St John the Evangelist Church at Sylvan Road/Auckland Road, to hear and discuss concerns about traffic issues in the area. The Head of Transport outlined the intended application of the 'Healthy Schools Neighbourhood' approach in the area around Auckland Road, with the Council carrying out surveys of traffic conditions, and engaging with residents and other stakeholders with a view to arriving at a consensus as to whether there are issues that needed to be addressed, and what those issues are, then seeking to achieve a consensus as to how those issues should be addressed.
- 1.3 Traffic surveys were in the process of being commissioned, but were then not progressed as the UK entered lockdown as a result of the Covid19 Pandemic on 26 March 2020 ('Lockdown'). The ability to obtain any meaningful data was not only impacted by the effects of Lockdown, but also by:
 - SGN having closed Auckland Road for emergency gas works, and
 - a car crashing into a shop on Church Road, and the temporary scaffolding placed in Church Road to support the damaged building, necessitating the closure of one side of Church Road and the introduction of temporary traffic signals.
- 1.4 In response to the Covid19 Pandemic, Croydon Council published its Croydon Streetspace webpages which included offering to work with residents to create low traffic streets to provide space for exercise etc.
- 1.5 On 2 May and 6 May 2020 respectively, Lancaster Road was closed at its junction with Southern Avenue and Warminster Road closed using emergency Notices under Section 14(2) of the Road Traffic Regulation Act 1984 and then by temporary traffic orders¹ made under S14(1) of the Act. The closure of Lancaster Road was made feasible by the SGN closure of Auckland Road. At the same time similar temporary closures were being introduced in nearby Albert Road and Holmesdale Road and in other streets in Croydon and across London.
- 1.6 On 6 May 2020 the Mayor of London published his Streetspace Plan for London² explaining that '*TfL, working with London's boroughs will make changes - unparalleled in a city London's size – to focus on three key areas*'. One of these is '*Reducing traffic on residential streets, creating low-traffic*

¹ <https://www.croydon.gov.uk/sites/default/files/articles/downloads/PN878.pdf>

² <https://www.london.gov.uk/press-releases/mayoral/mayors-bold-plan-will-overhaul-capitals-streets>

neighbourhoods right across London to enable more people to walk and cycle as part of their daily routine, as has happened during lockdown.'

The Mayor explained:

'The emergency measures included in our major strategic London Streetspace programme will help those who have to travel to work by fast-tracking the transformation of streets across our city. Many Londoners have rediscovered the joys of walking and cycling during lockdown and, by quickly and cheaply widening pavements, creating temporary cycle lanes and closing roads to through traffic we will enable millions more people to change the way they get around our city.'

TfL informed the London local authorities that funding previously intended to support their implementation of proposals within their LIPs, would not be provided, at least for the first half of 2020/21. Instead, funding would be made available with which to implement London Streetspace Plan measures.

- 1.7 On the same day, the Department for Transport (DfT) published statutory guidance 'Traffic Management Act 2004: Network Management in Response to COVID-19' (updated on 23 May 2020 and again on 13 November)³. In his foreword to the Guidance of 23 May, the Secretary of State for Transport explained that:

'..as people go back to work we need millions more people to cycle. Over 40% of urban journeys are under 2 miles – perfectly suited to walking and cycling. Active travel is affordable, delivers significant health benefits, has been shown to improve wellbeing, mitigates congestion, improves air quality and has no carbon emissions at the point of use. Towns and cities based around active travel will have happier and healthier citizens as well as lasting local economic benefits. Central government therefore expects local authorities to make significant changes to their road layouts to give more space to cyclists and pedestrians.'

The Guidance stated:

'Reallocating road space: measures

Local authorities in areas with high levels of public transport use should take measures to reallocate road space to people walking and cycling, both to encourage active travel and to enable social distancing during restart..... Local authorities where public transport use is low should be considering all possible measures.

(23rd May and 13th November)

³ <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>

Measures should be taken as swiftly as possible, and in any event within weeks, given the urgent need to change travel habits before the restart takes full effect.

None of these measures are new – they are interventions that are a standard part of the traffic management toolkit, but a step-change in their roll-out is needed to ensure a green restart. They include:

-
- *Modal filters (also known as filtered permeability); closing roads to motor traffic, for example by using planters or large barriers. Often used in residential areas, this can create neighbourhoods that are low-traffic or traffic free, creating a more pleasant environment that encourages people to walk and cycle, and improving safety.'*

1.8 The Traffic Orders Procedure (Coronavirus) (Amendment) (England) Regulations 2020 Statutory Instrument No 536⁴ was also made on 23rd May 2020. The 'Traffic Regulation Orders: Guidance on the Traffic Orders Procedure (Coronavirus)'⁵ published 29 June 2020 confirmed that:

'The amendments included in the SI are intended to speed up the time it takes for traffic authorities to make the traffic orders that are needed to put in place measures to deal with the effects of coronavirus, including the need to encourage social distancing and promote active travel, for example, walking and cycling'.

explaining that:

"Purposes connected to coronavirus" may include measures that are made as a response to, or with the intention of mitigating risks related to, the coronavirus pandemic. For example:

-
- *restricting certain roads to certain types of traffic'*

and

'Temporary orders can be in place for up to 6 months for footpaths, bridleways, restricted byways, cycle tracks or byways open to all traffic, and 18 months for all other orders.'

1.9 At the beginning of June, SGN announced that it was finishing its works and would be reopening Auckland Road. A swift decision was needed as to whether to re-open Lancaster Road (and hence also Southern Avenue) to through traffic, or to keep Auckland Road closed to through motor traffic, (enabling the 'protection' offered to Southern Avenue and other streets by virtue of the Lancaster Road closure, to continue). Auckland Road was closed by means of

⁴ <https://www.legislation.gov.uk/uksi/2020/536/contents/made>

⁵ <https://www.gov.uk/government/publications/making-traffic-regulation-orders-during-coronavirus-covid-19/traffic-regulation-orders-guidance-on-the-traffic-orders-procedure-coronavirus>

an emergency Notice at the location of the SGN closure on 06 June moving to S14 Order on 03 July 2020⁶ .

- 1.10 Residents of Stambourne Way and Sylvan Hill experienced significantly increased traffic through their streets whilst SGN had closed Auckland Road and the scaffolding was in Church Road. They undertook their own traffic surveys to quantify the magnitude of impact they were experiencing and requested a meeting with the Cabinet Member for Transport. The meeting was held via Zoom and the Cabinet Member and Head of Transport listened to the experiences and concerns of the residents.
- 1.11 On 3rd August 2020 the Council temporarily closed Stambourne Way, Sylvan Hill and Fox Hill to through motor traffic, initially by Notice published under S14 of the Road Traffic Regulation Act 1984 ('1984 Act') and then by Temporary Traffic Order⁷ made under the same section of the 1984 Act. London Borough of Bromley Council ('Bromley Council') was given notice on 28 July 2020 of the intention to implement the temporary closures. At the same time Croydon Council officers reached out to Bromley Council officers to work to implement mitigation in streets in Bromley if it was felt to be needed. In parallel, the temporary closure of Auckland Road was replaced by a 'bus gate' (permitting the passage of buses and cycles) enforced by camera. As these temporary measures were being implemented, the term 'Crystal Palace and South Norwood Temporary Low Traffic Neighbourhood' was increasingly being used. The Temporary LTN was given its own webpage when the Council revamped its Croydon Streetspace section of its website in September.

Croydon Covid19 Response Streetspace 'Strategy'

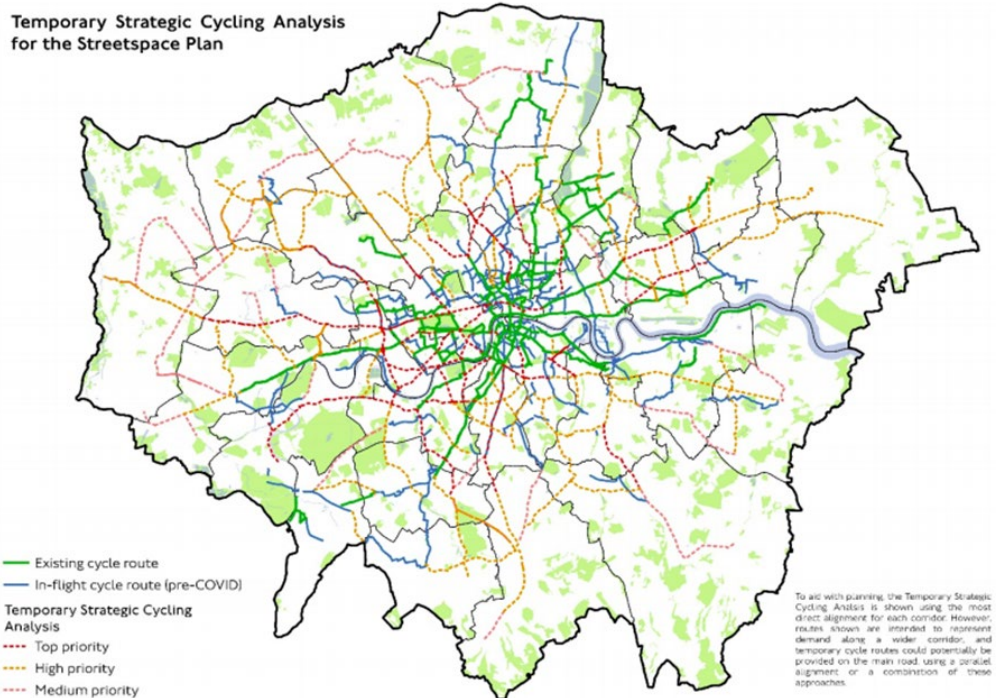
- 1.12 The measures introduced by Croydon Council following publication of the Streetspace Plan for London (such as the temporary closures of Holmesdale Road, Albert Road and Lancaster Road) were initially reactive. They did however become part of a 'rapid response strategy'. In support of the Streetspace Plan for London, TfL published a series of data sets to aid local authority prioritisation of locations to focus action and particular types of measures. These included the '**Temporary Strategic Cycling Analysis**'⁸ which identified a series of priority cycling corridors in Croydon. The one 'Top Priority' corridor in Croydon runs from Crystal Palace and South Norwood towards the Town Centre. The Temporary Strategic Cycling Analysis document explains that TfL has revised its Strategic Cycling Analysis in line with the objectives of the Streetspace Plan to provide an evidence-led blueprint for the Temporary Strategic Cycle Network, called the Temporary Strategic Cycling Analysis. *'TfL will prioritise activity in line with this framework, and boroughs are strongly encouraged to bring forward proposals that align with priority corridors identified in the Temporary SCA.'*

⁶ <https://www.croydon.gov.uk/sites/default/files/articles/downloads/PN912.pdf> .

⁷ <https://www.croydon.gov.uk/sites/default/files/articles/downloads/PN999.pdf>

⁸ <http://content.tfl.gov.uk/lsp-app-four-analysis-temp-sca-v1.pdf>

Figure 1. TfL Temporary SCA Priority Cycling Corridors
 Figure 4.4: Temporary Strategic Cycling Analysis for Streetspace Plan



‘Analysis on Low Traffic Neighbourhoods’⁹ which indicated areas for potential Low Traffic neighbourhoods; these being predominantly in the north of the Borough of Croydon. The document explains that the Analysis divided London into a series of residential neighbourhoods. These act primarily as a common geographic basis for comparing data across different areas of London. This analysis should help boroughs to:

- Understand the challenges schemes may seek to address
- Gauge the potential for LTNs in their area
- Identify different options and prioritise between them
- Provide a basis for evidence-led discussions with stakeholders

The Neighbourhoods are allocated two scores, a traffic filtering score and a general score. These are combined on the map in Figure two below. The traffic filtering score is based on:

- Modelled through traffic
- Recorded walking and cycling casualties
- Modelled potential cycling flows

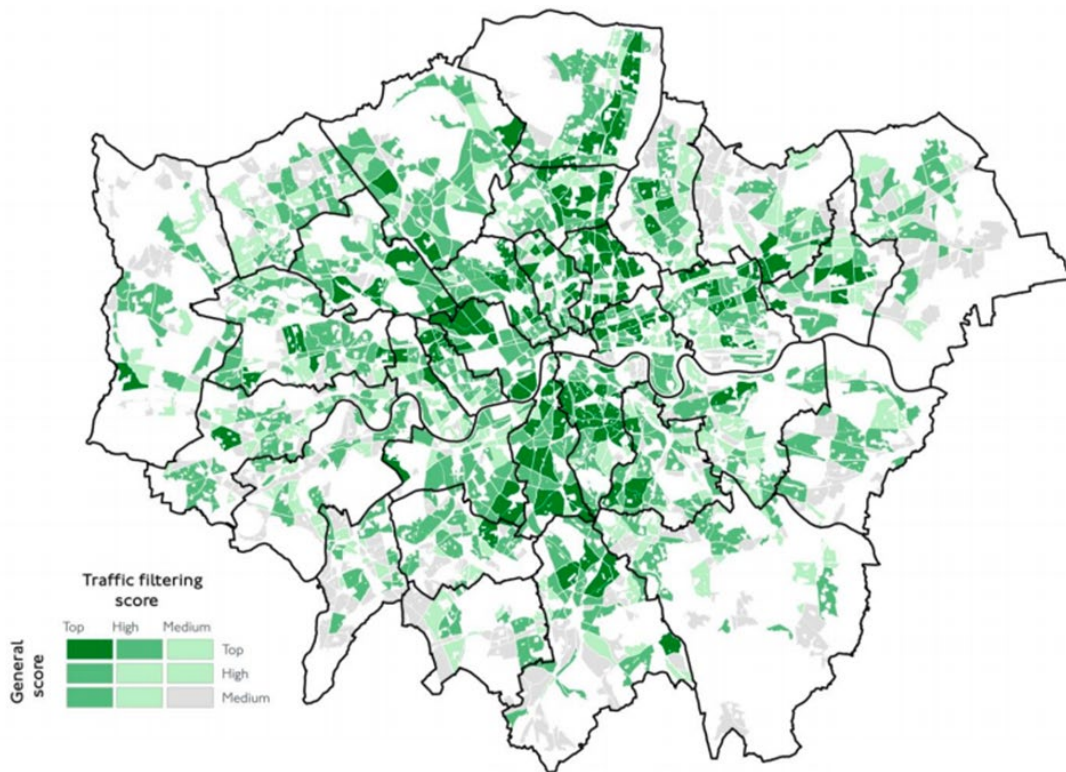
The general score is based on:

- The social distancing challenge (pavement widths and population density)
- The number of schools
- Levels of deprivation
- Total population and low car ownership

Resulting in the ‘SNA overview map’, intended to show a snapshot of the potential for low traffic neighbourhoods (LTNs) across London, and where the greatest need may be.

⁹ <http://content.tfl.gov.uk/lsp-app-six-b-strategic-neighbourhoods-analysis-v1.pdf>

Figure 2. SNA overview map

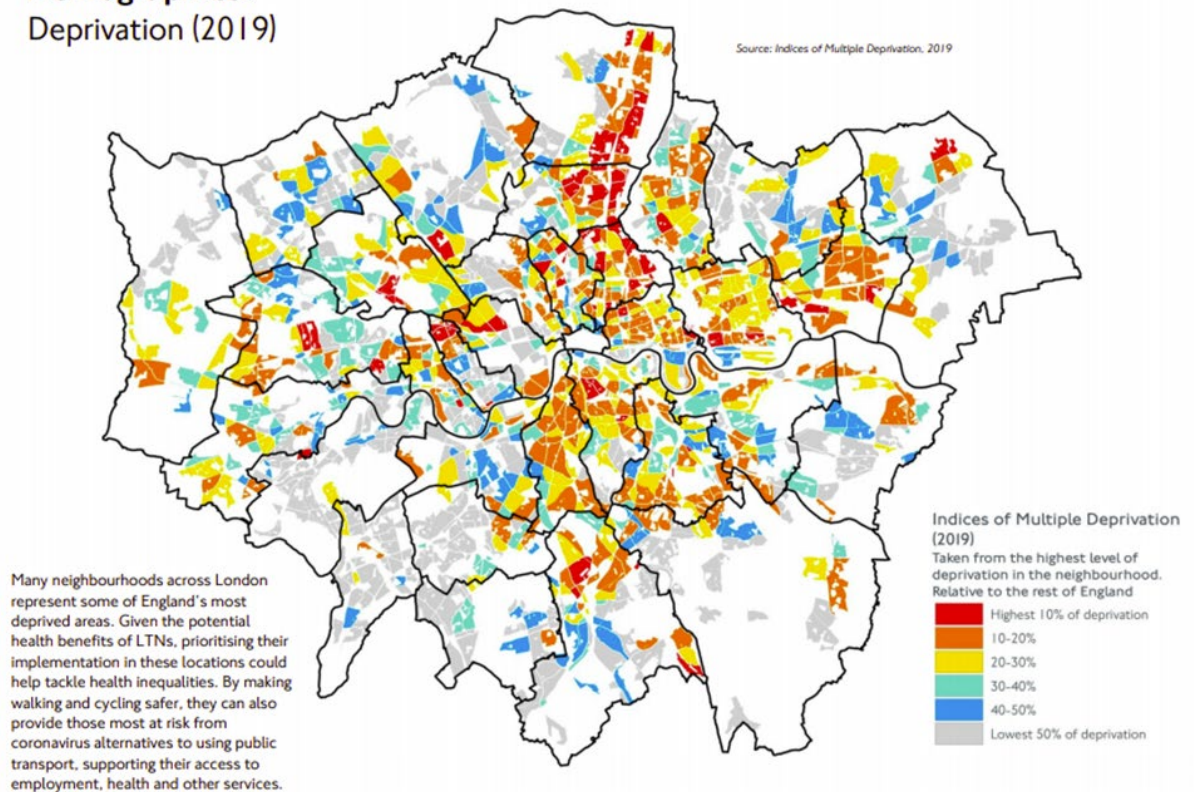


The Analysis document separately maps each of the factors incorporated into the Analysis, eg Deprivation

Figure 3. SNA Mapping of Deprivation

Demographics:

Deprivation (2019)



- 1.13 The Croydon Council commissioned 'Cycling Skills Level Audit' (2019) was also employed. This study looked at every street in the Borough, classifying the level of cycling ability needed to cycle within each street. The majority of streets are suitable for cycling by beginners, having low traffic levels / low traffic speeds. Consequently they are also places where it is relatively safe and pleasant to walk. However these tend not to be linked together into meaningful routes. The streets focused on (when developing the Covid response Streetspace 'Strategy') were those in 20mph limit areas, but which require advanced cycling skills due largely to the speed and volume of traffic. These streets are generally unclassified roads that are being used by drivers making longer distance through journeys. Many would have been 'access' streets in the old Road Hierarchy, but are acting as 'distributor roads' as they make useful connecting routes for drivers. These routes can do the same for people on bikes and people walking, if the traffic environment permits / encourages it. As a consequence of the volume and speed of traffic in these streets, many of them are where residents requested action be taken to address both.
- 1.14 The proposed programme resulting from / responding to this 'strategy' looked to create cycling and walking routes away from the busiest street corridors, where possible. On these busy corridors, the competition for space is greatest. It is also where the district and local centres tend to sit and where space to facilitate social distancing within the centres was a priority. They are also where vulnerable road user casualties are concentrated. The 'strategy' envisaged Auckland Road, Lancaster Road and Southern Avenue being part of a strategic cycling and walking route picking up the Top Priority Cycle Corridor identified by TfL through its 'Temporary Strategic Cycling Analysis', connecting Crystal Palace to the Croydon Town Centre via Holmesdale Road.
- 1.15 Two requests were submitted to TfL for Streetspace Plan for London funding. The first was for the initial reactive measures. The second and much larger request was predominantly for funding to implement the 'rapid response strategy'. This second funding request took the combined bid over £1m and hence the requests were the subject of a Key Decision (Decision ref: 0120PL)¹⁰

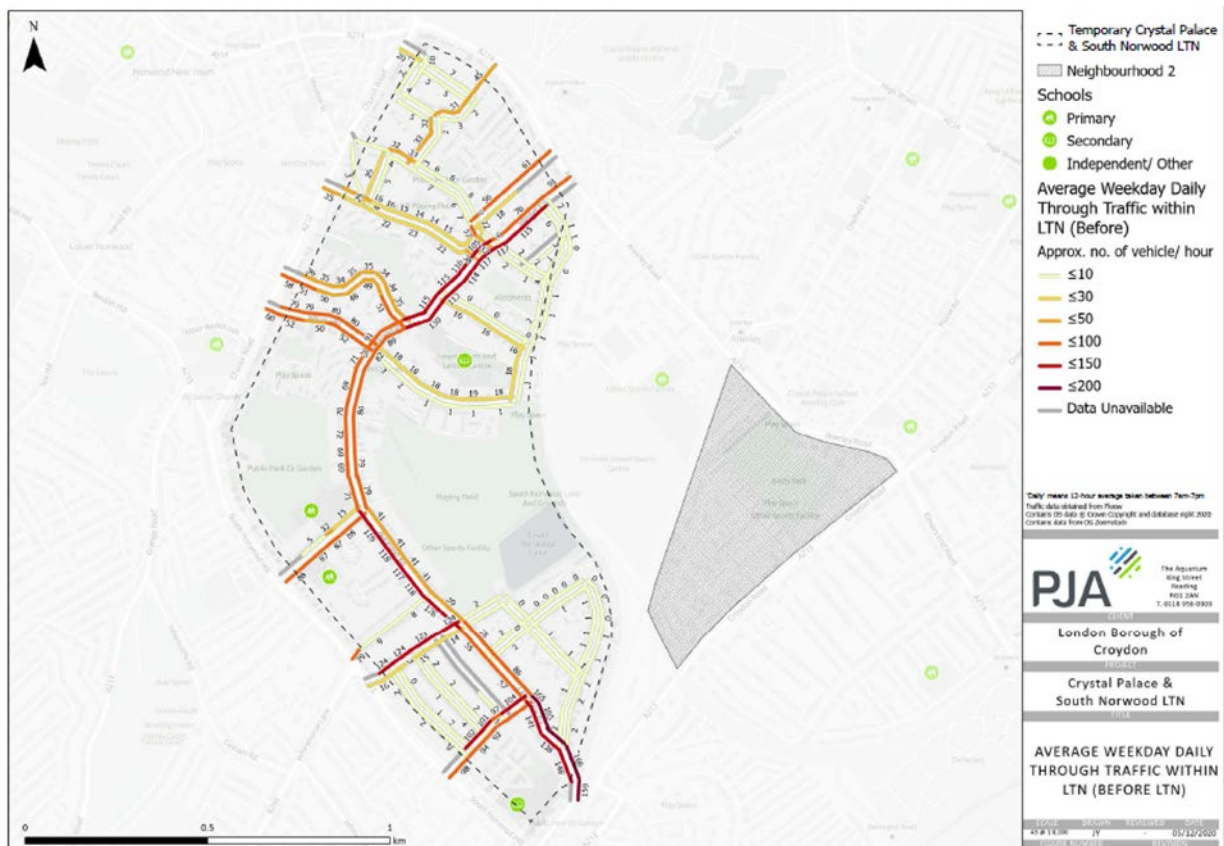
¹⁰ <https://www.croydon.gov.uk/sites/default/files/0120PL%20Decision%20Notice.pdf>

Analysis of Traffic Effects

The Effects Arising from the Implementation of the Temporary LTN

- 1.1. As the Covid19 Pandemic worsened, and the UK was entering the first lockdown, traffic surveys which were in the process of being commissioned, were not pursued. As the temporary LTN grew in stages from South Norwood towards Crystal Palace, officers began to consider how the effects of the temporary measure might be assessed. PJA consultants were commissioned to use 'Flow' data (derived from in vehicle telematics equipment) and other data to paint a picture of the traffic effects arising whilst the temporary measures have been in place. The 'Flow' data can only paint a picture in broad brush strokes.
- 1.2. Because of how the 'Flow' data are derived, they are collected over extended time periods. 'Flow' data for the period 'before the LTN', was taken from February 2019 to March 2019. This was before any temporary measures went into Lancaster Road and was also before the temporary traffic signals were installed in Church Road. The data used to assess the effects 'during the LTN' were drawn from the period June to November. This period starts prior to the measures being placed in Sylvan Hill, Stambourne Way and Fox Hill (and hence the results have to be approached with caution). It also covered the period when the temporary traffic signals were in Church Road, severely constraining the capacity of the A212 / A214. It was also 'During Covid Pandemic' when traffic levels dropped sharply at the start of the first Lockdown but from April began to increase again.
- 1.3. The Flow data were used to assess the number of vehicles using streets within the Temporary LTN to pass through the LTN without stopping at a destination within the LTN, or starting the journey in the LTN. The image below is taken from the PJA report. The darker colours indicate the higher through traffic flows. The figures are vehicles per hour in each direction, averaged over a 12hr weekday day. The pattern it shows pre Temporary LTN reveal high flows in Hamlet Road and Auckland (north) with some of this flow dissipating via Sylvan Hill, Stambourne Way and Fox Hill. Hence the flow further south in Auckland Road is lessened somewhat. The image does indicate high traffic flows in Lancaster Road, (particularly the southern section, and in Southern Avenue).

Figure 1. Average Weekday Through Traffic Before the Temporary LTN



4.4 PJA compared the:

- daily traffic flows; and
- traffic flow in the morning and evening peaks averaged over the three hours of each peak

before and 'during' the Temporary LTN. As the 'During LTN' data were collected from June, but Sylvan Hill, Stambourne Way and Fox Hill were not closed until August, the 'During LTN' shows a considerable number of through vehicles using these streets. (The figures will have been further heightened due to traffic using these streets between June and August to avoid the queues in Church Road A212 and elsewhere, arising from the scaffolding and temporary traffic signals in Church Road) Consequently, it is likely over representing the flow in Auckland Road north 'during the Temporary LTN', and under representing the flow in Belvedere Road, Cintra Park, Patterson Road and Milestone Road in the Borough of Bromley. The consult report refers to 'an anomaly' appearing on Hamlet Road. However, the picture painted here is as one might expect. Hamlet Road would have received increased flows between June and July from traffic using Sylvan Hill and Stambourne Way to avoid the queuing in Church Road. After the closure of Sylvan Hill, Stambourne Way and Fox Hill, Hamlet Road would have continued to carry traffic seeking to avoid the historic que on Annerley Hill, but which was then using Belvedere and Milestone etc. Roads. The picture is probably most accurately painted south of the temporary closure / bus gate in Auckland Road.

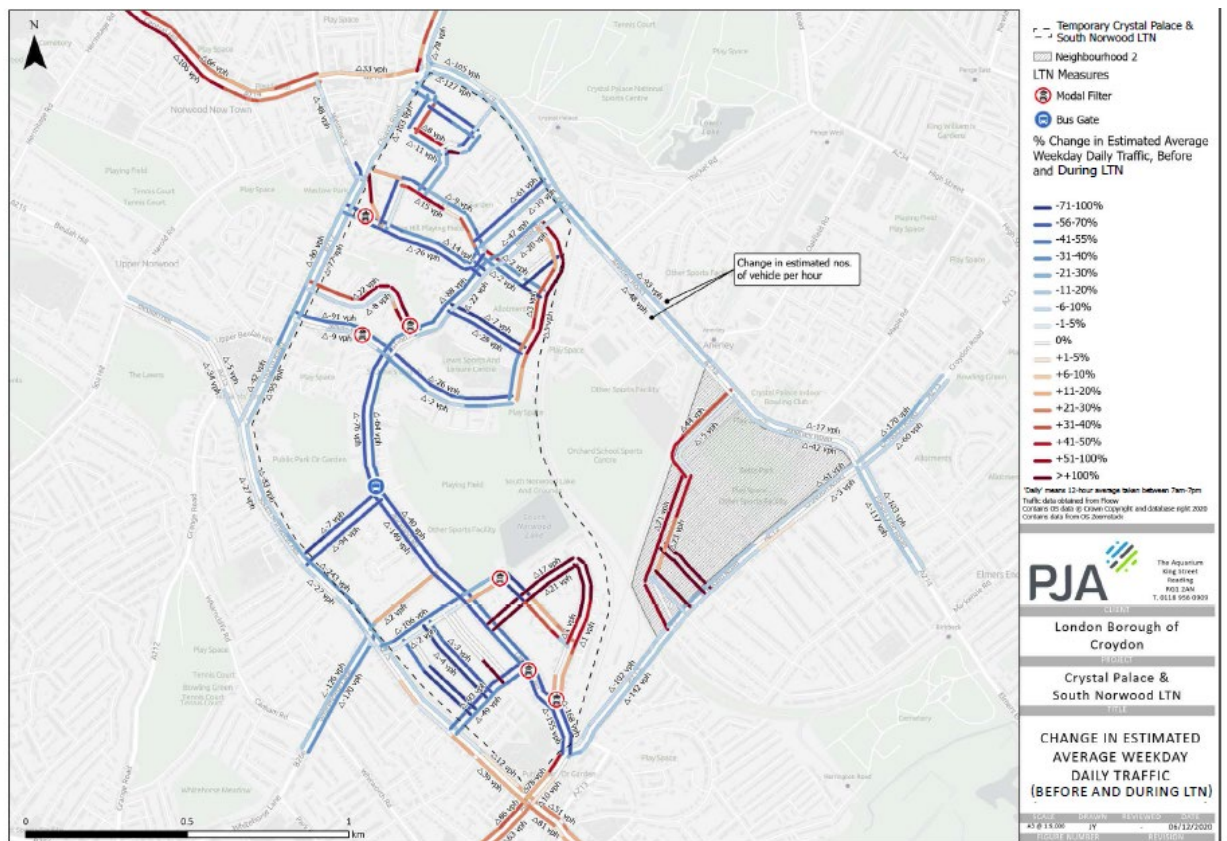
The PJA report includes a table comparison of flow in the peaks before and during the Temp LTN, on 'Roads commonly used by through traffic'. The likes of Belvedere and Milestone etc. Roads are not included in the table as these were previously not 'commonly used by through traffic'

Table 1 Comparison of through traffic flows 'Before' and 'During' the Temporary LTN

Roads commonly used by through traffic within LTN (excluding roads with anomaly)		AM Peak		PM Peak	
		Before (vph)	During (vph)	Before (vph)	During (vph)
Waldegrave Road	NB	105	8	96	15
Cintra Park-Tudor Road	NB	84	4	29	0
Stambourne Way	WB	37	12	99	33
	EB	90	0	20	12
Auckland Road (Sylvan Hill-Cypress Road)	NB	96	8	132	20
	SB	70	24	155	37
Cypress Road	WB	206	12	87	37
Auckland Road (Cypress Road-Woodvale Avenue)	NB	283	8	158	28
	SB	38	12	88	5
	EB	250	4	201	6
Woodvale Avenue	WB	20	8	96	30
	EB	55	4	201	6
Southern Avenue	WB	20	8	96	26
	NB	263	4	182	9
Lancaster Road	SB	111	4	364	7

- 1.5 The 'Flow' data analysis suggests that during weekdays average traffic volume reduced in most streets including on the A Roads surrounding the LTN during the period of the LTN, compared with before (with some important exceptions). The blue in the image below indicates reductions, the red an increase. (the 'red' / increase indicated in Stambourne Way will be arising from vehicles diverting through it between June and August to avoid the effects of the scaffolding and temporary signals is Church Road)

Figure 2 Change in Estimated Average Weekday Traffic Flow



- 1.6 In the morning and evening peak periods, some links on the surrounding 'A' Roads experienced an increase in traffic whilst others a decrease 'During Temporary LTN' compared with before. As the daily average was in the large part lower 'during the Temporary LTN' compared to before, it is suggested that the increase in traffic on some links during the peaks was perhaps arising from people choosing the car over public transport for the commute. The reason for some links experiencing a decrease may have been due to the 'during covid' car based commuter journey pattern being different to that pre-covid. People would probably also have adjusted their journeys in response to the delays caused by the temporary signals in Church Road.
- 1.7 The 'Flow' data indicate that before the LTN period there was a flow of through traffic from Church Road via Fox Hill and Cintra Park (Bromley) to Anerley in the morning peak which was on a par with the flow from Auckland Road via Sylvan Hill to Church Road. This stopped 'During the Temporary LTN', to be replaced by vehicles using Belvedere Road, Cintra Park, Patterson Road and Milestone Road. This is a movement repeatedly drawn to the attention of Council officers, Members and others by the residents of these streets. The magnitude of this movement is understated in the data, due to the period of the 'During LTN' starting in June, when Fox Hill, Stambourne Way and Sylvan Hill where still open to through traffic (until August).

- 1.8 Bromley Council officers requested that the study also look at Selby Road and Seymour Villas in Bromley, a longstanding route (through in some places very narrow streets) used by drivers seeking to avoid the queues at the junction of Annerley Road A214 and Croydon Road A213 (When the DfT last surveyed traffic in 2009 at Seymour Villas to estimate annual average daily traffic flows the estimate was 1600 vehicles eastbound and 1616 westbound). The 'Flow' data analysis indicates an increase in traffic using these and a couple of connecting streets when traffic on other streets had fallen.
- 1.9 PJA supplement the Flow data with bus journey time data provided by TfL. They use both data sets to paint the picture of change at section 3.5 ('Discussion') of the report and draw their conclusions at section 4. They also make recommendations at section 4, including that the Council considers monitoring the effects of the temporary LTN comprehensively, with ATCs after the traffic flows have returned to normal. The Appendix to the report summarises the results of Traffic surveys undertaken after the scaffolding was removed from Church Road but still in second Lockdown, for comparison purposes during the recommended experiment / trial LTN. The surveys are however providing some useful indications here and now as they are beginning to be analysed.
- 1.10 Traffic entering and exiting Milestone Road at its junction with Church Road was recorded on weekdays (24 hours) at the end of November / beginning of December. The average daily flows recorded in Milestone Road were 1011 vehicles per day northbound and 289 southbound (the latter is assumed not to be traffic travelling through the area/rather it has a destination in the Temporary LTN). The DfT count traffic on one street within the Temporary LTN, namely on Stambourne Way, PJA estimated annual daily traffic flow in Stambourne Way, based on the DfT 2019 count was 1768 total vehicles. This provides a useful comparison. However, making the comparison is not intended to suggest that the level of traffic currently using Milestone Road and the streets connecting to it, is acceptable.
- 1.11 TfL has provided its own monitoring analysis at Appendix 4(b). The TfL analysis relies primarily on bus journey time data provided by the iBus system. These are the same data used by PJA consultants as part of their analysis, except the TfL analysis is more recent and so includes data gathered after the removal of the traffic signals from Church Road.

Cycling and Walking in Auckland Road

- 1.13 The Council commissioned surveys including of pedestrians and cyclists in Auckland Road at Cypress Road carried out over three separate days:
- | | | | | | | |
|----------|------------------|-----------|---------|-----|--------|-----------------------------|
| Saturday | 28 th | November, | weather | was | mainly | overcast |
| Tuesday | 1 st | December, | weather | was | mainly | bright |
| Thursday | 3 rd | December, | weather | saw | light | rain and drizzle throughout |

The Open Our Roads group also carried out a cycling survey over two days, 14th and 15th September, with both surveys covering the hours 07:00 – 10:00.

Cycling Survey

The survey undertaken by residents at the Cypress Road junction on the weekday (the 14th) recorded a total of 49 cycling journeys between 7am and 10am. The weather on the day of the survey was bright and sunny.

The survey carried out by the Council, over the same 7am to 10 period saw:

1st December 37 journeys

3rd December 26 journeys

The downturn in cycling at this time can be considered to be as a consequence of darker mornings, colder weather and, particularly on 3rd December, rain. There is also the effect of the second lockdown which may have meant that fewer people had a need to travel at that time.

Pedestrian Survey

The pedestrian count shows that the presence of two local schools within the area has an effect on the numbers of children and teenagers walking through the area during the week, their numbers dropped significantly at the weekend. It should also be noted that the poor weather on 3rd also saw a significant drop in the number of pedestrians (across all classes) accessing the local area.

Temporary Crystal Palace and South Norwood Low Traffic Neighbourhood

Study Report

December 2020



CROYDON
www.croydon.gov.uk

Version Control and Approval

Version	Date	Main Contributors	Issued by	Approved by
1.0	12/11/2020	JY	JMQ	JMQ
2.0	03/12/2020	JY	JMQ	JMQ
2.1	07/12/2020	JY	-	-
2.2	9/12/2020	JY	-	-
2.3	11/12/2020	JY	JMQ, BC	JMQ
2.4	14/12/2020	JY	JMQ	JMQ
2.5	17/12/2020	JY	JMQ	JMQ
2.6	21/12/2020	JY	-	-

Prepared for

London Borough of Croydon

1	INTRODUCTION	5
2	BASELINE ANALYSIS	11
3	TRAFFIC ANALYSIS	31
4	CONCLUSIONS	81
	APPENDIX	85

1

INTRODUCTION

1 INTRODUCTION

Background

London Borough of Croydon (LB Croydon) has introduced a series of Temporary Low Traffic Neighbourhood (LTN) measures in the Crystal Palace and South Norwood area. The temporary LTN measures are intended to provide safe spaces for people to walk, cycle, exercise and socially distance, and have been developed in response to the Department for Transport's (DfT) Emergency Active Travel Fund (EATF) criteria. It is worth noting that there are historical issues regarding vehicle speeds and volumes on residential streets in the area which predate the introduction of the temporary LTN measures.

PJA has been commissioned by LB Croydon to complete a baseline analysis of the neighbourhood, and to undertake traffic analyses to review the effects of the temporary scheme.

Temporary LTN measures

LB Croydon has introduced seven temporary LTN measures in the area in stages through Temporary Traffic Management Orders. The extents of the temporary LTN are shown opposite. Whilst there is no formal boundary to the temporary LTN, the notional 'neighbourhood' spans across the boundary with the London Borough of Bromley (LB Bromley). The temporary LTN covers a large

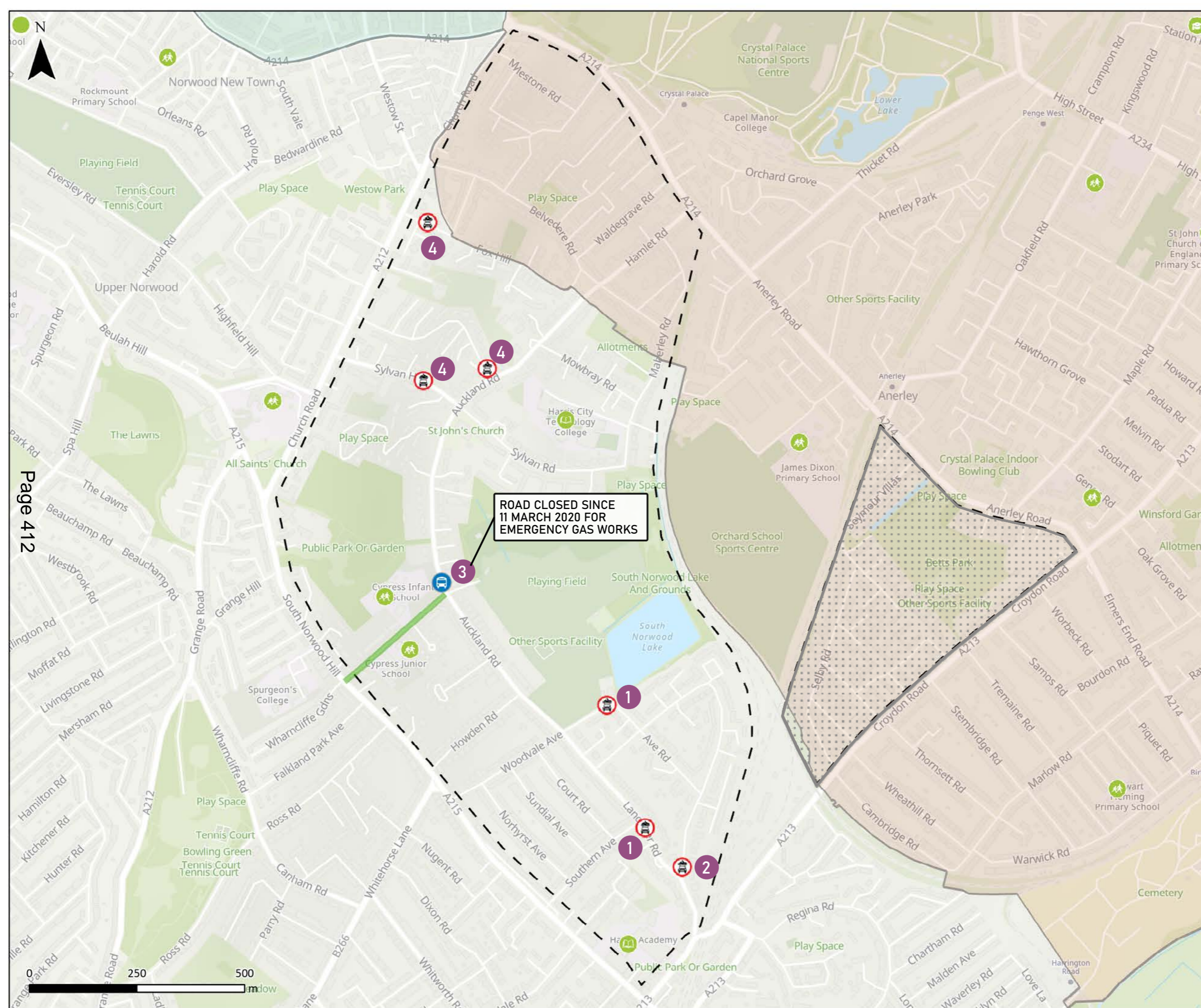
area bounded by main A Roads and the railway line.

Six of these measures are 'modal filters' which prohibit motor vehicle access, but maintain through access for pedestrians and cyclists. The seventh location uses a bus gate which has the same operation as the other modal filters however through access is provided for bus services. The location of the measures is indicated on the plan opposite. A short timeline also explains the development of the temporary LTN and when the different measures were installed. Photos of the temporary LTN measures and more information on the rationale of the scheme are provided overleaf.

While we have made every effort to undertake an extensive review on the traffic effects associated with the temporary LTN, there are limitations. The general reduction in traffic due to COVID-19, coupled with a series of road works conducted in a close proximity to the temporary LTN, has posed difficulties in measuring and deducing effects arising directly from the scheme. We have also taken these factors into consideration when undertaking the analyses.

Temporary LTN Timeline

- 1 2 May 2020**
Modal filters placed on (TMO PN874):
 - Junction of Lancaster Road/Southern Avenue
 - Junction of Woodvale Avenue/Avenue Road
- 2 9 May 2020**
Modal filter placed at (TMO PN878):
 - Junction of Lancaster Road/Warminster Road
- 3 7 June 2020**
Modal filter placed on Auckland Road by Cypress Road (This was upgraded to a Bus Gate on 15/07/20 (TMO PN912), and with camera enforcement on 31/07/20 July (TMO PN928).
The road was closed by Southern Gas Network for emergency gas works since 11 March 2020.
- 4 3 August 2020**
Modal filters placed on (TMO PN999):
 - Stambourne Way
 - Sylvan Hill
 - Fox Hill



- Temporary Crystal Palace & South Norwood LTN
- Neighbourhood 2*
- Borough Boundary
- LB Bromley
- LB Lambeth
- School Street scheme on Cypress Road (since Feb 2020)
- LTN Measures**
 - Modal filter
 - Bus Gate
- Schools**
 - Primary
 - Secondary
 - Independent/ Other
 - College and University

ROAD CLOSED SINCE 11 MARCH 2020 FOR EMERGENCY GAS WORKS

*Out of scope for Baseline analysis; analysed in regards to traffic impact in the latter part of this study
 Contains OpenStreetMap data © OpenStreetMap contributors
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack, Contains OS data © Crown Copyright and database right 2019

PJA The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon

PROJECT
Crystal Palace & South Norwood LTN

TITLE
TEMPORARY LTN SCHEME OVERVIEW

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,000	JY	JMQ	20/11/2020
FIGURE NUMBER	REVISION		
8			

Rationale for Low Traffic Neighbourhoods

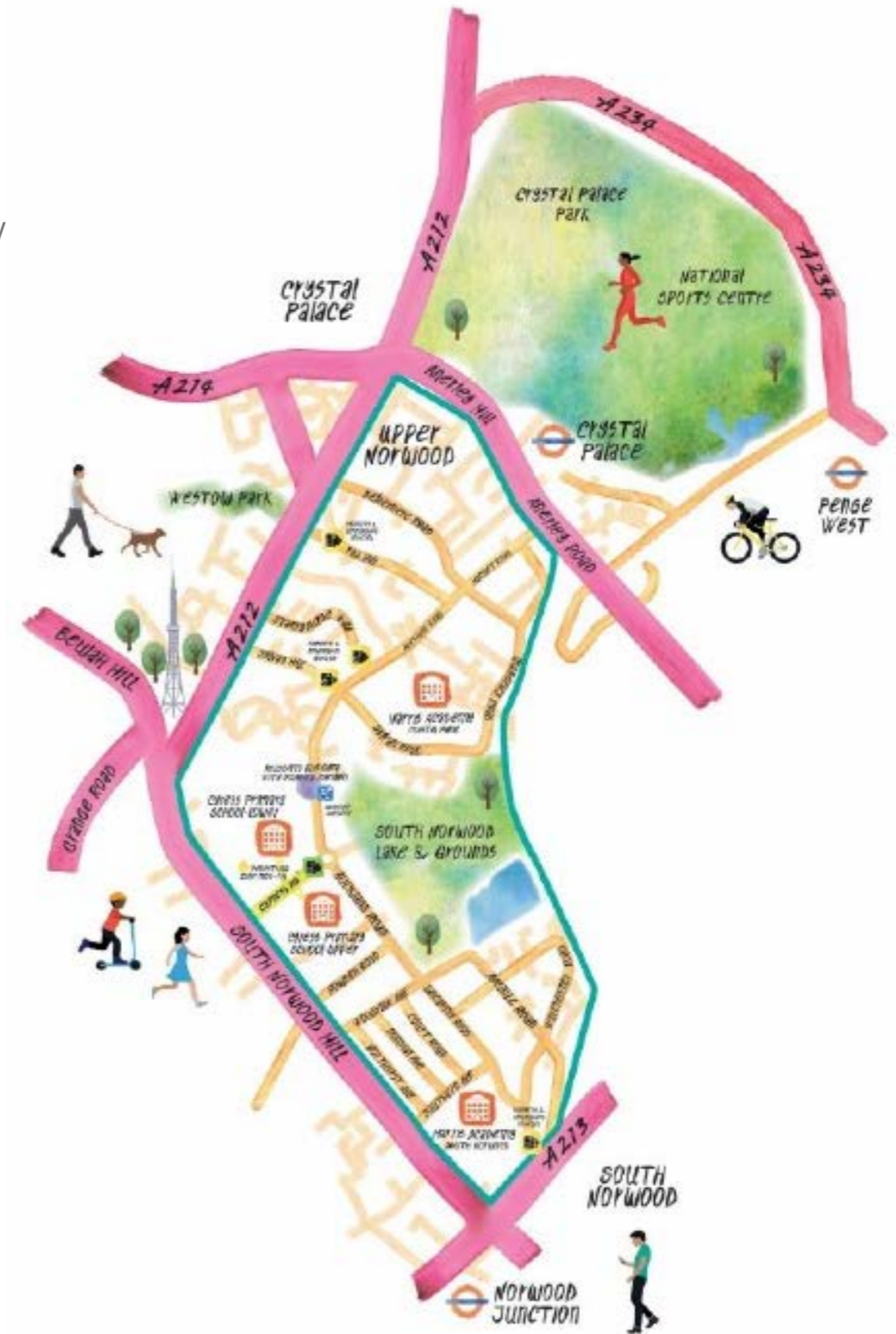
Low Traffic Neighbourhoods (LTN) aim to reduce the impact of through vehicular traffic upon streets. Although coined as Low Traffic 'Neighbourhoods' which implies a residential focus, the approach can be applied to any area where through traffic has an adverse effect on other users. The main output of LTNs is reduced through traffic volumes, however the approach and its benefits are significantly wider ranging than traffic management. The additional benefits include improved air and noise quality, improved access to open spaces and parks, and improved road safety.

Low Traffic Neighbourhood is an increasingly popular method for encouraging increased levels of walking and cycling through the creation of low traffic environments. The Department for Transport's recently published 'Cycle Infrastructure Design - Local Transport Note 1/20' also makes specific reference to the use of low-traffic environments.

Rationale for EATF Streetspace Programme

At the start of the first Lockdown in Spring 2020, LB Croydon introduced a series of temporary LTN measures to stop through traffic using certain streets.

Temporary LTNs have been installed by many London Boroughs as part of their EATF responses, including Brent, Camden, Enfield, Lambeth, Hackney, and Southwark. As with LB Croydon, these authorities are now monitoring the effects of the temporary measures and reviewing the next steps, which include removal or options for more permanent arrangements.





Auckland Road



Pedestrian and Cycle Zone as part of the existing Cypress Road school street scheme



Stambourne Way modal filter



Advanced warning sign provided regarding bus gate on Auckland Road



Advanced warning sign provided regarding road closure on Sylvan Hill



Auckland Road bus gate

2 BASELINE ANALYSIS

2.1 TRIP ATTRACTORS

This chapter presents our desk-based review of the baseline conditions of the neighbourhood, which covers the following topics:

- Trip attractors
- Public transport and walking
- Cycle network
- Car ownership
- Pedestrian and cyclist casualties
- Schools within the temporary LTN and pupils' home location
- Air quality

TRIP ATTRACTORS

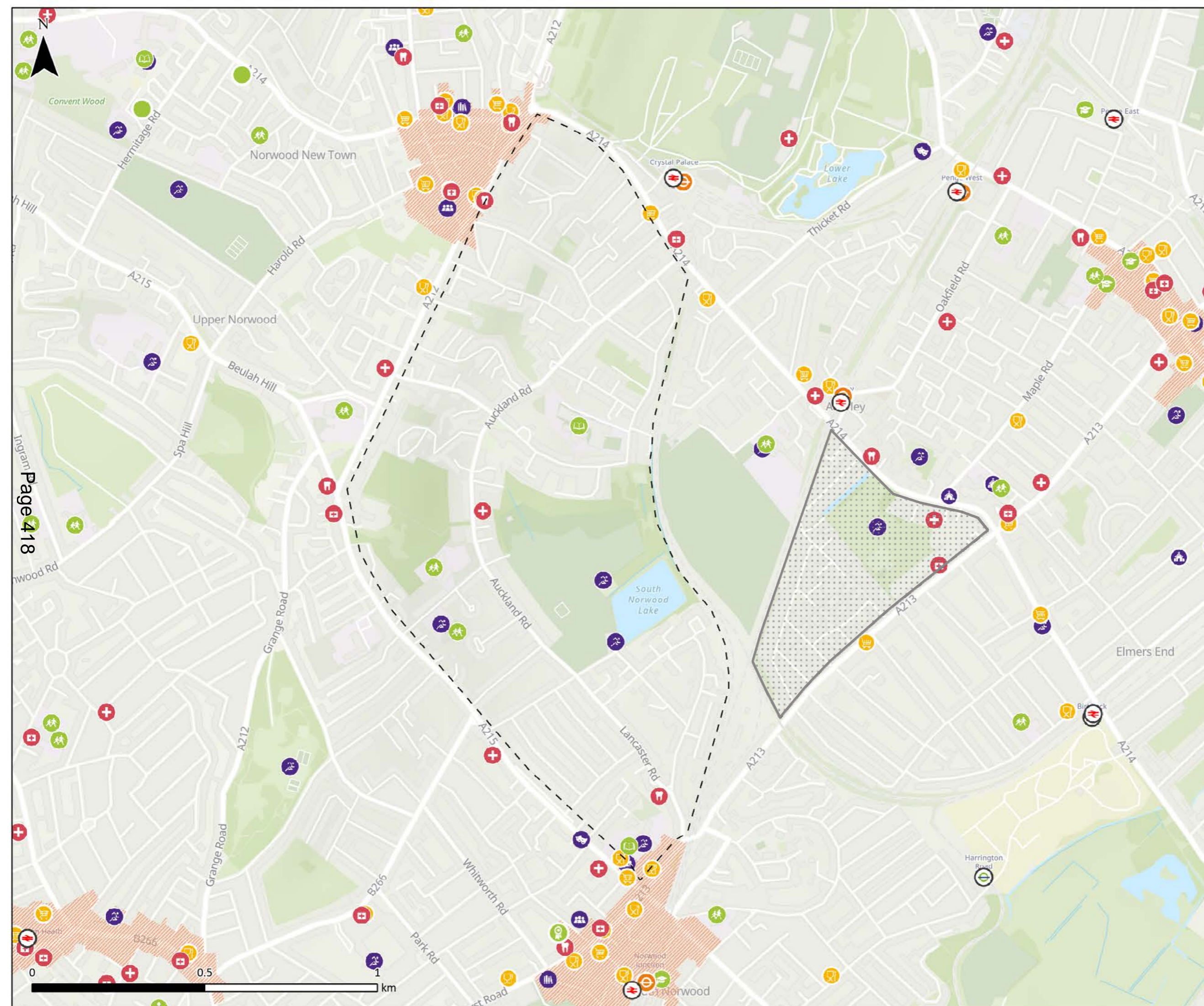
The plan opposite summarises the key trip attractors in the vicinity of the Temporary Crystal Palace and South Norwood LTN. It is important to review the distribution of these attractors to help understand movement patterns within the LTN.

There is a high density of trip attractors located at both the northern and southern edges of the LTN. Both of these areas, Upper Norwood and South Norwood, are recognised as District Centres in the London Plan.

There are restaurants, retail points,

pharmacies, dentists, community centres and libraries at both locations.

Within the area of the temporary LTN, there is a GP surgery, a dentist, three sport facilities, three schools and two large open spaces. With a well-connected residential street network, there is convenient access to amenities, schools and other facilities in and around the temporary LTN.



- Temporary Crystal Palace & South Norwood LTN
- Neighbourhood 2*
- National Rail
- Overground
- Tramlink
- Healthcare Facilities**
 - Hospital
 - General Practice
 - Pharmacy
 - Dentist
- Schools**
 - Nursery
 - Primary
 - Secondary
 - Sixth Form
 - Independent/ Other
 - College and University
- Amenities**
 - Supermarket
 - Pub
 - Library
 - Community Centre
 - Sport Facility
 - Theatre
 - Place of Worship
 - District Centre (London Plan)

*Out of scope for Baseline analysis; analysed in regards to traffic impact in the latter part of this study
 Contains Data © Sport England Retail Points © Geolytix Ltd
 Contains GLA and other public sector information licensed under the OGL v3.0.
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack, Contains OS data © Crown Copyright and database right 2019

PJA The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon

PROJECT
Crystal Palace & South Norwood LTN

TITLE

TRIP GENERATORS

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:10,000	JY	-	10/11/2020
FIGURE NUMBER	REVISION		
2	-		



2.2 SCHOOLS

The opposite plan identifies both the location of schools in the temporary LTN as well as the home locations of most of their pupils. This helps to understand the impact of the schools in the wider area and the key routes that pupils are likely to use to access the schools. There are three schools in the temporary LTN:

- Cypress Primary School (747 pupils)
(with two sites on Cypress Road)
- Harris Academy South Norwood (1572 pupils)
- Harris City Academy Crystal Palace (1209 pupils)

Despite Harris Academy South Norwood is located within the temporary LTN boundary, it is on a cul-de-sac that can only be accessed from South Norwood Hill.

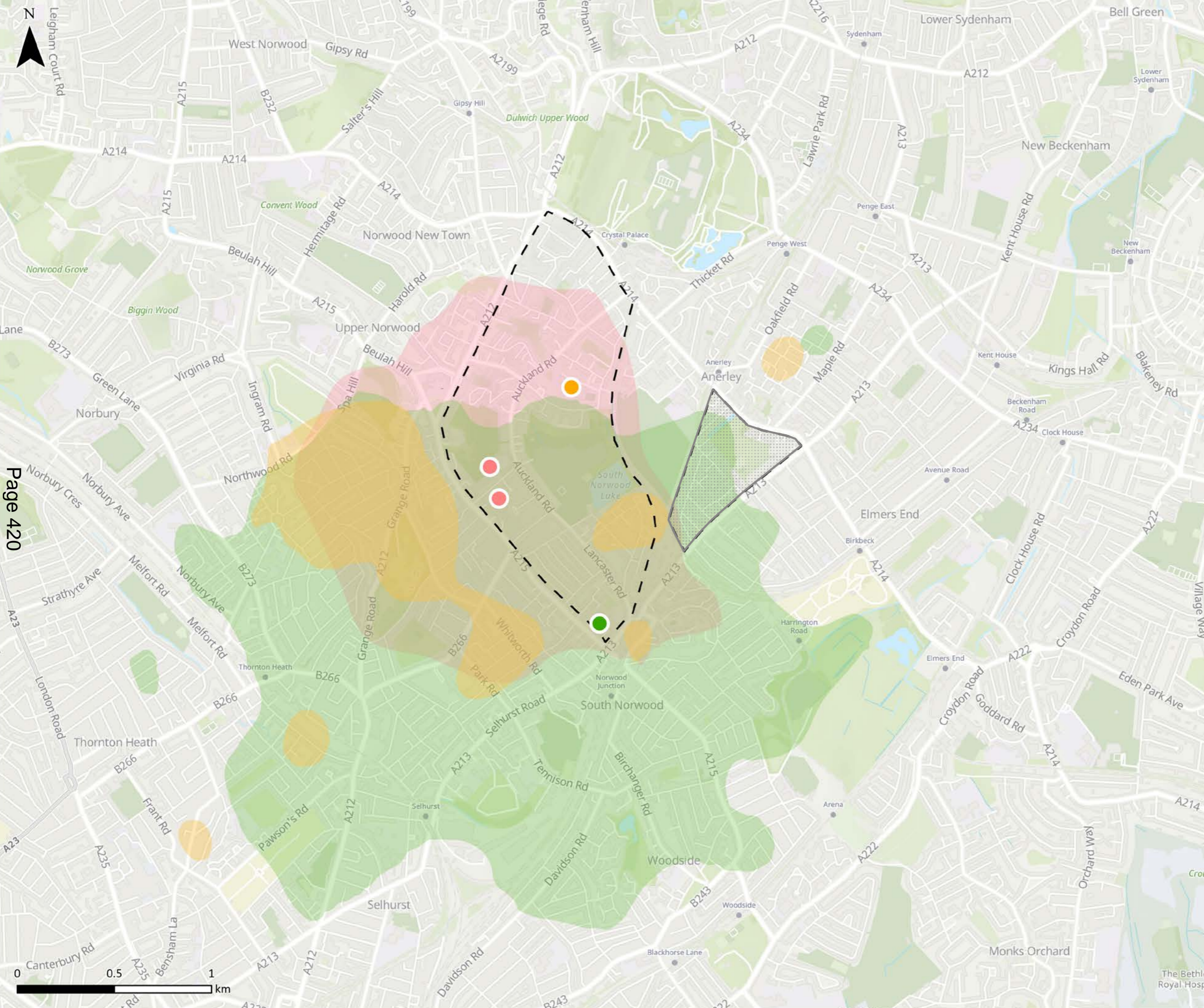
The plan shows that over half of the home location catchment for Cypress Primary School is within the temporary LTN. A majority of pupils from Harris Academy South Norwood and Harris City Academy Crystal Palace live outside of the temporary LTN area.

Most pupils attending the local schools located in the temporary LTN live within 3.1km of their school. Based on TfL data,

these distances would be considered comfortably cyclable and potentially walkable too^{1 2}. It would be expected to be beneficial to reduce road danger by reducing through traffic volumes in vicinity of the schools, with the aim of providing a safer routes for walking, cycling and scooting, etc. to schools for pupils.

1 - TfL's ['Analysis of Cycling Potential'](#) defines a cycleable trip as less than 8km and the traveller is over 5 and under 64,

2- TfL's ['Analysis of Walking Potential'](#) defines a walkable trip as less than 1.5km for those aged under 12 or over 69; and under 2km made by those aged 12-69.



- Temporary Crystal Palace & South Norwood LTN
- Neighbourhood 2*
- Schools within the LTN**
- Cypress Primary School (747 pupils)
- Harris Academy South Norwood (1572 pupils)
- Harris City Academy Crystal Palace (1209 pupils)
- Home locations of most pupils**
- Cypress Primary School
- Harris Academy South Norwood
- Harris City Academy Crystal Palace

*Out of scope for Baseline analysis; analysed in regards to traffic impact in the latter part of this study
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack, Contains OS data © Crown Copyright and database right 2019

PJA  The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT

London Borough of Croydon

PROJECT

Crystal Palace & South Norwood LTN

TITLE

SCHOOLS AND HOME LOCATION OF MOST PUPILS

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:18,000	JY	JMQ	20/11/2020
FIGURE NUMBER	REVISION		
9			

2.3 PUBLIC TRANSPORT AND WALKING

PUBLIC TRANSPORT ACCESSIBILITY

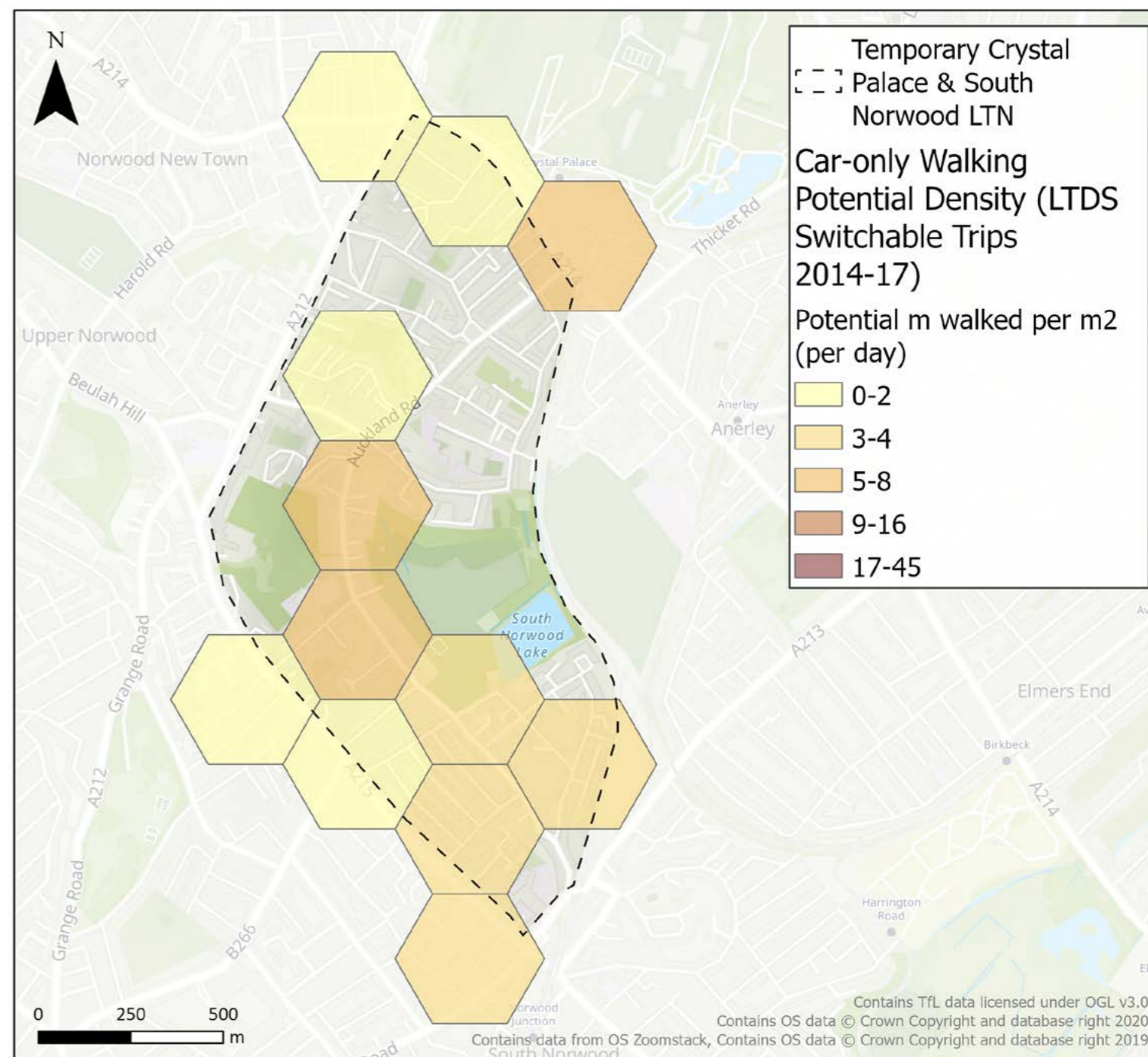
Public transport accessibility levels are analysed by TfL on a relative basis and are expressed as 'Public Transport Accessibility Levels' (PTAL). The PTAL scores range from 0 (worst) up to 6b (best). The PTAL scores for the study area are illustrated overleaf.

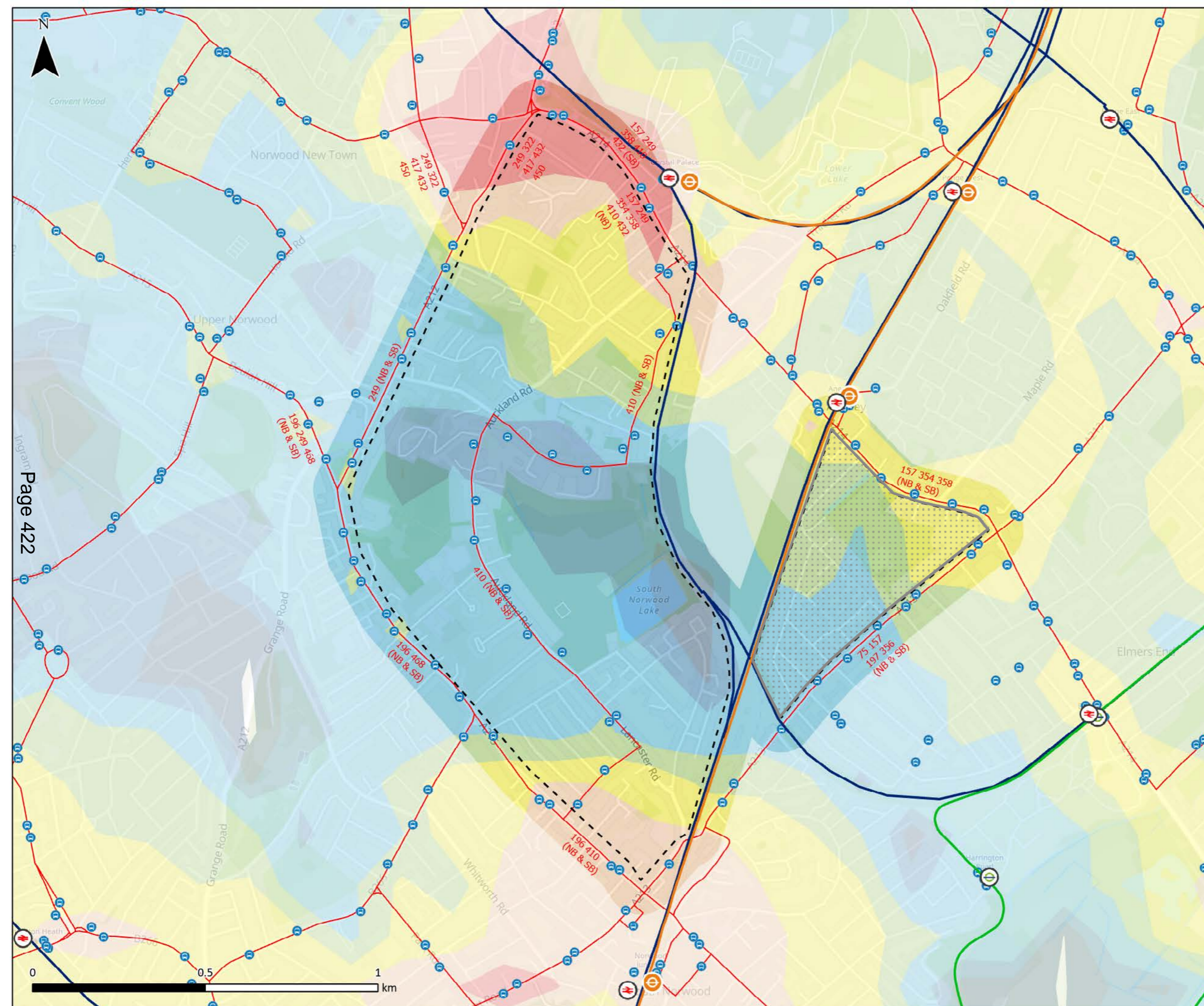
Over half of the temporary LTN area has a PTAL rating of 1 to 3. The northern and southern edges of the temporary LTN have PTAL scores of between 4 and 6a respectively. The temporary LTN area is bounded by bus routes and the 410 bus route runs through it. The difference in the distribution of PTAL rates is explained by the presence of rail stations at the northern and southern ends of the temporary LTN which increase the scores in neighbouring areas.

WALKING POTENTIAL

Whilst PTAL scores vary across the temporary LTN, the TfL 'Car-Only Walking Potential Density' assessment (right) suggests that there is a moderate potential through the area for increased walking trips switchable from car driving. The data represents the density of walking trips that could be made by residents living within each of the hexagons, if they switched from driving a car. The assessment captures 'potential

trips' by measuring the impact of switching suitable existing short private car trips to foot.





- Temporary Crystal Palace & South Norwood LTN
- Neighbourhood 2*
- Rail Connections**
 - Overground
 - Tramlink
 - National Rail Lines
- Bus Connections**
 - Bus Stop
 - Bus Routes
- Public Transport Accessibility Level**
 - 0 (worst)
 - 1a
 - 1b
 - 2
 - 3
 - 4
 - 5
 - 6a
 - 6b (best)

*Out of scope for Baseline analysis; analysed in regards to traffic impact in the latter part of this study
 Contains Transport for London and other public sector information licensed under the OGL v3.0.
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack, Contains OS data © Crown Copyright and database right 2019

PJA The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon

PROJECT
Crystal Palace & South Norwood LTN

TITLE
Public Transport Connections

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:10,000	JY	JMQ	11/11/2020
FIGURE NUMBER	REVISION		
6			

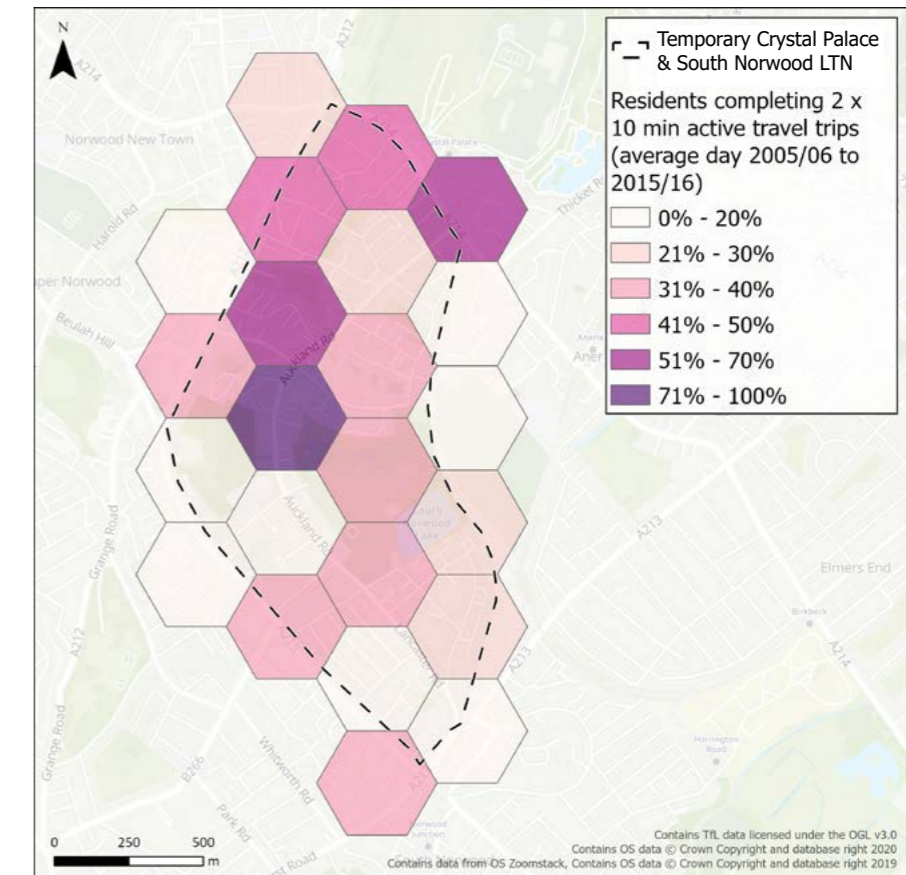
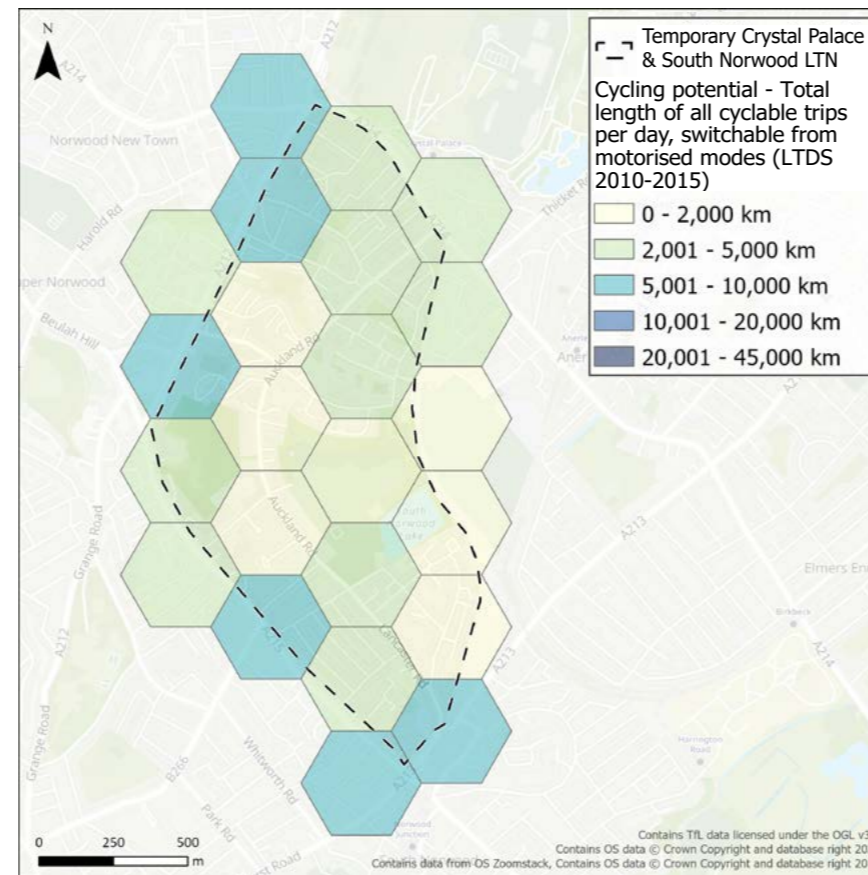
2.4 CYCLE NETWORK

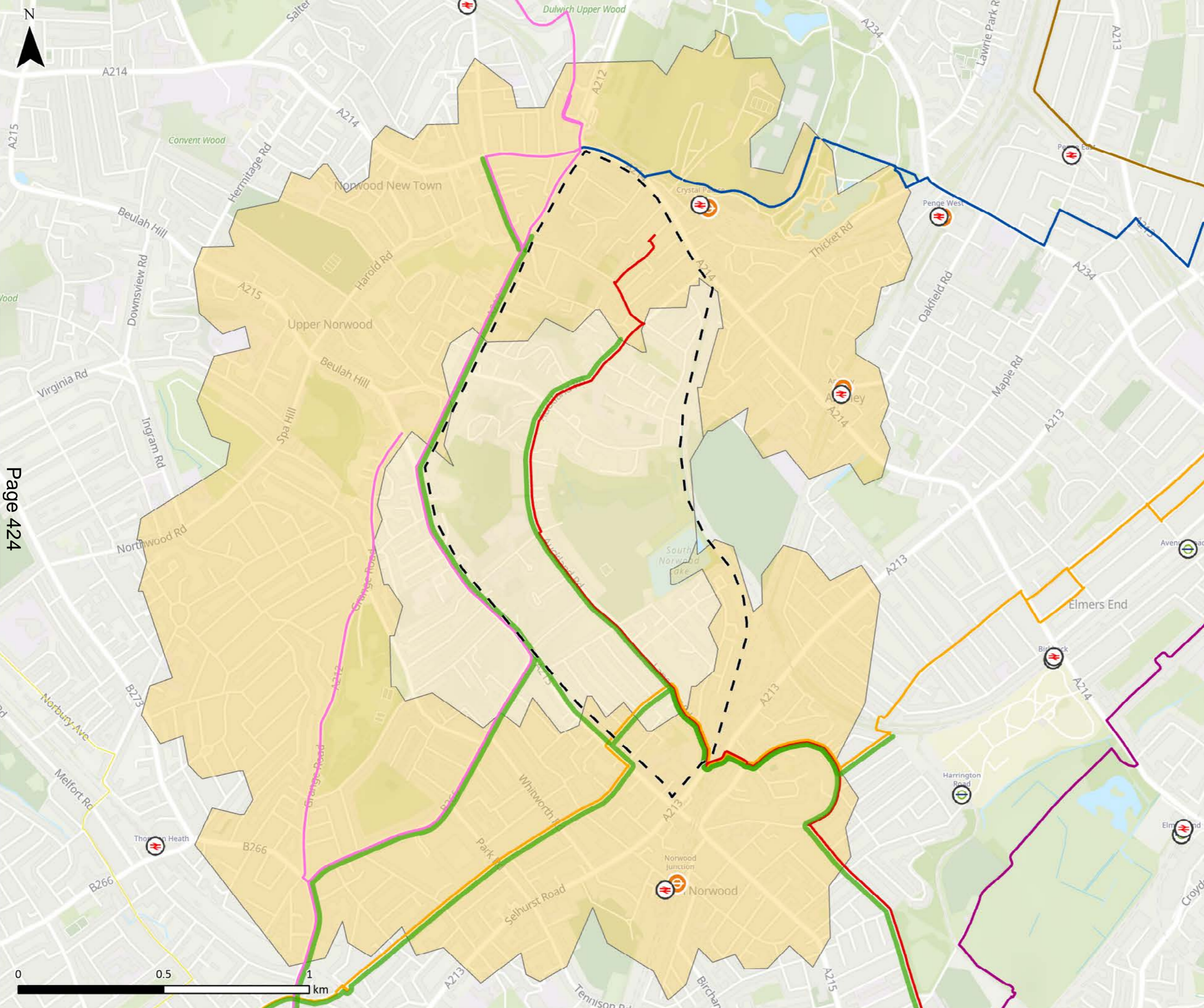
The plan overleaf summarises the existing cycle network in the vicinity of the temporary LTN area. The plan also includes cycling isochrones to illustrate the distance that could be cycled in five minutes and ten minutes using the existing road network. It shows that Thornton Heath to the southwest, as well as Crystal Palace, Anerley and South Norwood rail stations are located within a ten-minute cycle journey from the centre point of the temporary LTN area.

The combined outputs highlights that there are currently a number of route options in the area and that a majority of the temporary LTN is within a five minute cycle ride.

The two figures on this page compare the potential for increased cycling activity using outputs from TfL's City Planner Tool.

- The left figure shows TfL's assessment of the total length of all cyclable trips that could be made per day by residents living within each of the hexagons, if they switched from motorised modes.
- The figure to the right shows TfL's assessment of the proportion of residents who complete at least two 10-minute active travel trip on an average day.





- Temporary Crystal Palace & South Norwood LTN
- National Rail
- Overground
- Tramlink
- Cycle Time from LTN centroid**
- ≤ 5 mins
- ≤ 10 mins
- Existing Cycle Routes**
- Existing Croydon Secondary Cycle Routes (LIP3)
- LCN 23
- LCN 27
- LCN 29
- LCN 5
- LCN 62
- LCN 77
- NCN 21

Contains OpenStreetMap data © OpenStreetMap contributors
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack, Contains OS data © Crown Copyright and database right 2019

PJA The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon

PROJECT
Crystal Palace & South Norwood LTN

TITLE
CYCLE NETWORK

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:12,000	JY	JMQ	02/12/2020
FIGURE NUMBER	REVISION		
7	A		



2.5 CAR OWNERSHIP

This plan to the right summarises the percentage of households that have access to at least one car or van based on 2011 Census data.

About 55% of the households in the temporary LTN area have access to one or more cars or vans. Areas with higher car ownership percentage are generally located around the centre of the temporary LTN area, with a relationship with accessibility to public transport.

The 2021 census will provide a more accurate picture.

2.6 TRAFFIC MANAGEMENT (BEFORE LTN)

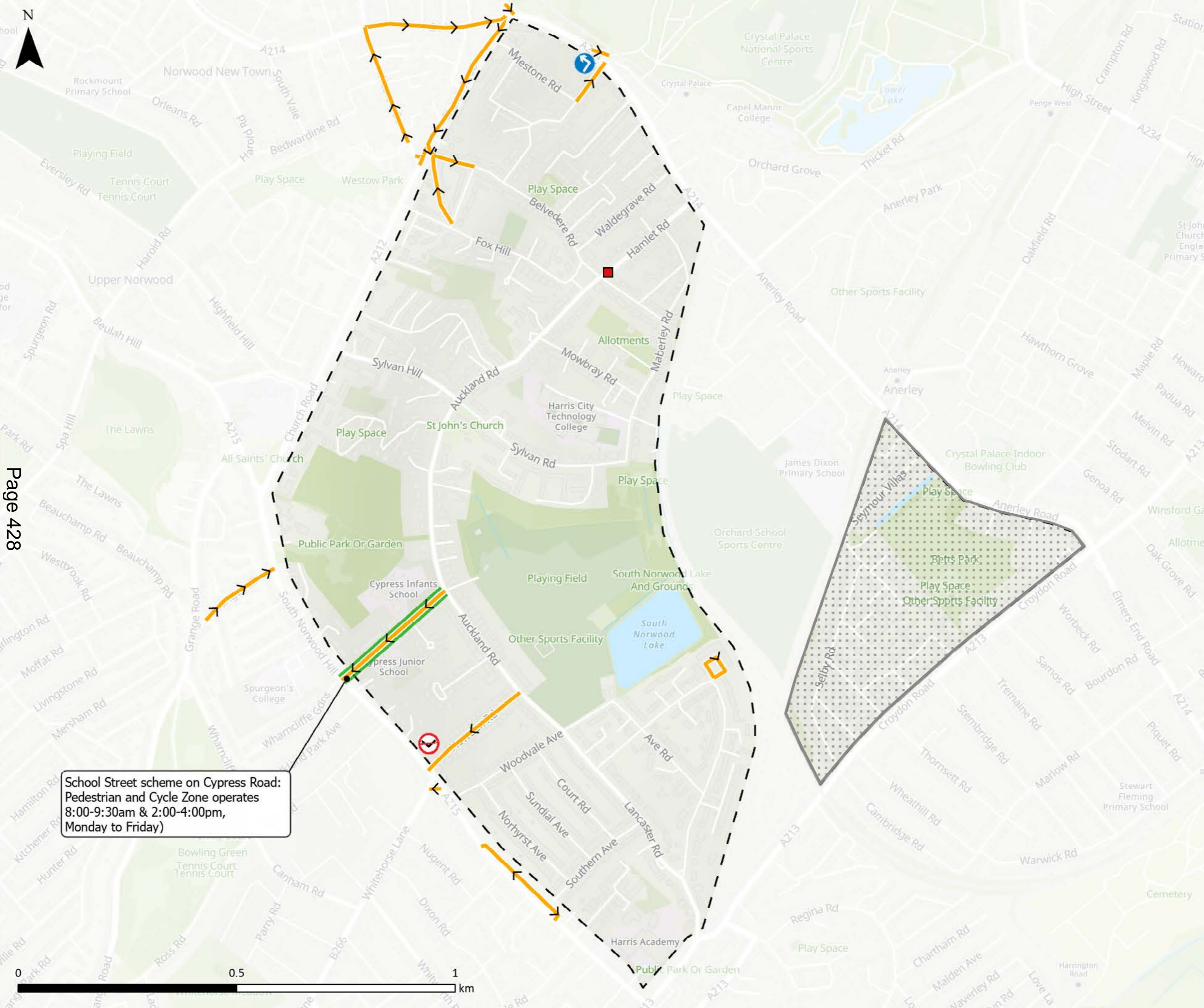
This plan summarises the traffic management measures within the area before the temporary LTN measures were introduced since May 2020. This provides an understanding on its baseline permeability level of vehicular traffic and action taken in the past to address traffic issues.

There are several traffic management measures that are currently in place in or around the LTN. These measures are listed below:

- A mandatory left turn is in place at Cintra Park junction with Anerley Hill.
- A right turn ban is in place at Howden Road junction with South Norwood Hill.
- Within the temporary LTN area, one-way operations are in place on:
 - Cintra Park
 - Landsdowne Place
 - Belvedere Road (western section)
 - Cyress Road
 - Howden Road
 - Warminster Square
- A width restriction where Auckland Road joins Hamlet Road
- A gyratory system is in place along the northern section of Church Road, Westow

Street and the eastern section of Westow Hill.

- A school street scheme has been introduced on Cypress Road since February 2020, not long before the first Lockdown in March. It is a pedestrian and cycle zone arrangement enforced from Monday to Friday, during 8-9:30am and 2-4pm.



- Temporary Crystal Palace & South Norwood LTN
- Neighbourhood 2*
- School Street scheme on Cypress Road (since Feb 2020)
- One Way Road
- Turn Restriction**
- Mandatory Left Turn
- Banned Right Turn
- Width Restriction

School Street scheme on Cypress Road: Pedestrian and Cycle Zone operates 8:00-9:30am & 2:00-4:00pm, Monday to Friday)

*Out of scope for Baseline analysis; analysed in regards to traffic impact in the latter part of this study
 Contains public sector information licensed under the OGL v3.0
 Contains OS Data © Crown Copyright and database right 2019
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack, Contains OS data © Crown Copyright and database right 2019

PJA  The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon
 PROJECT

Auckland Road LTN
 TITLE

TRAFFIC MANAGEMENT MEASURES (BEFORE LTN IMPLEMENTATION)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,000	JY	-	27/11/2020
FIGURE NUMBER	REVISION		
11			

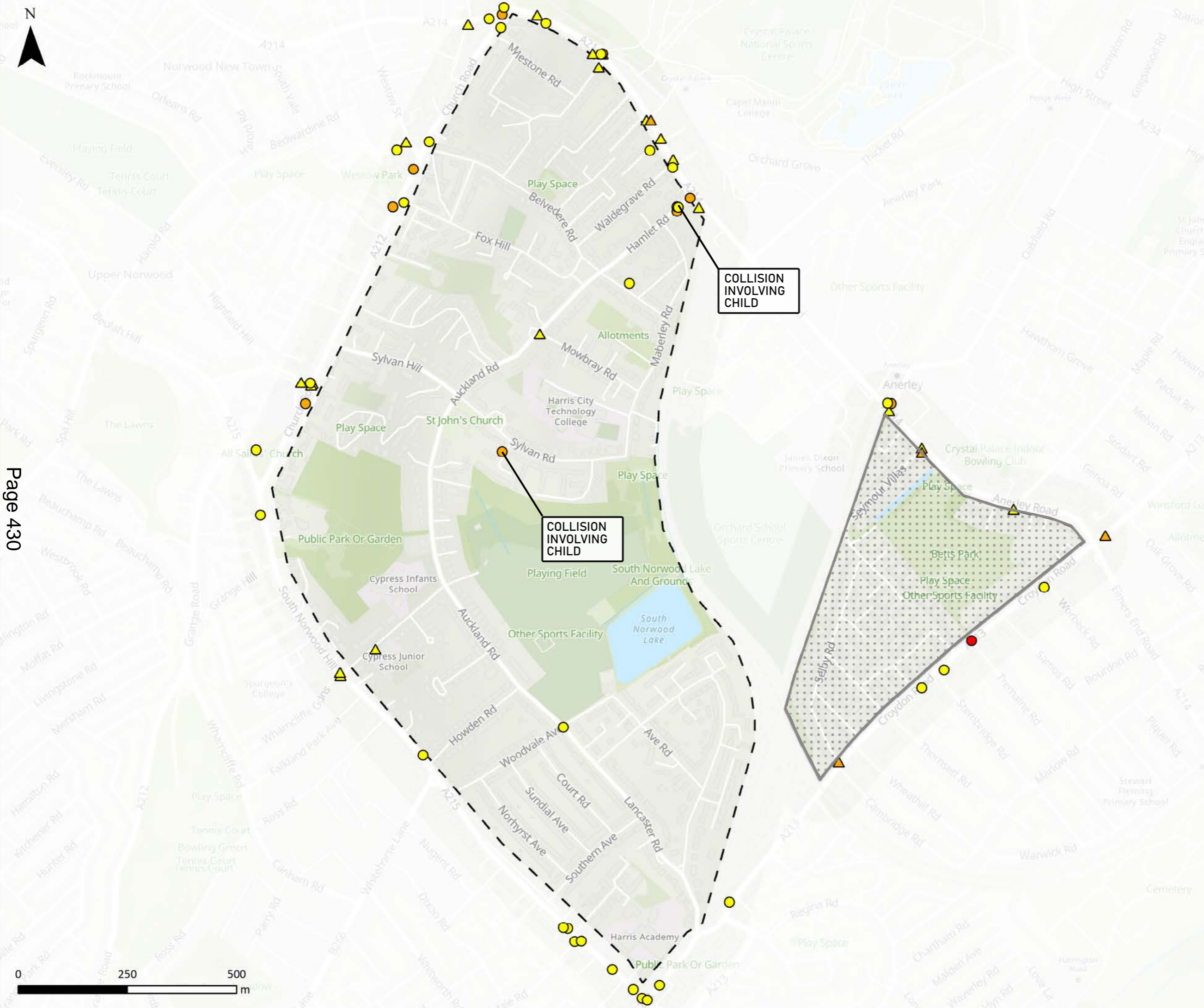
2.7 PEDESTRIAN AND CYCLIST CASUALTIES

This plan summarises collisions resulting in pedestrians and/or cyclist casualties between April 2017 and April 2020. This is the latest collision data available to date, provided by Transport for London.

There were nine collisions involving pedestrians or cyclists within the LTN area. Two of which were serious injuries. Notably, two of these collisions (22%) within the temporary LTN (as annotated on the plan) involved children walking.

These figures are neither a true reflection of road danger (due to under reporting of injured casualties to the police¹) or road risk (due to people lowering risk by not walking or cycling where they see streets as dangerous, and not allowing their children to do so).

1 - [DfT \(2017\), Reported Road Casualties in Great Britain: notes, definitions, symbols and conventions](#)



- Temporary Crystal Palace & South Norwood LTN
- Neighbourhood 2*
- Pedestrian and Cyclist Collision (Apr 2017-Apr 2020)**
- Pedestrian**
 - Fatal
 - Serious
 - Slight
- Cyclist**
 - Serious
 - Slight

*Out of scope for Baseline analysis; analysed in regards to traffic impact in the latter part of this study
 School pupils statistics obtained from GLA's London School Atlas
 Contains public sector information licensed under the OGL v3.0
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack, Contains OS data © Crown Copyright and database right 2019

PJA The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

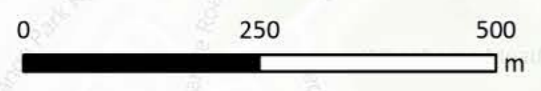
CLIENT
London Borough of Croydon

PROJECT
Crystal Palace & South Norwood LTN

TITLE

PEDESTRIAN AND CYCLIST COLLISIONS

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,000	JY	JMQ	26/11/2020
FIGURE NUMBER	REVISION		
10			



2.8 AIR QUALITY

Three plans have been presented in the following pages (27-29), showing the annual mean concentrations of PM10, PM2.5 and NO2 in 2016.

PM10

Although the temporary LTN area have shown PM10 concentrations that are within the UK legal limit (40 $\mu\text{g}/\text{m}^3$), most parts of it are still higher than the WHO guideline limit of 20 $\mu\text{g}/\text{m}^3$.

Concentrations around the boundary roads ranges from between 22 to 34 $\mu\text{g}/\text{m}^3$. Auckland Road, which runs north-south across the temporary LTN, has shown concentrations between 21 to 23 $\mu\text{g}/\text{m}^3$, which are figures within the range shown on main roads.

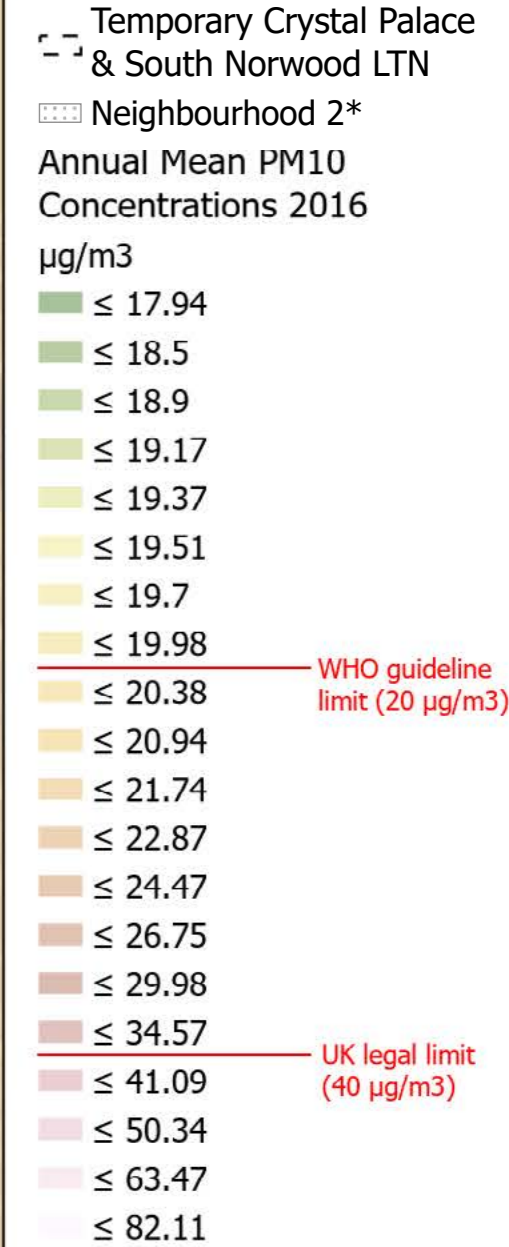
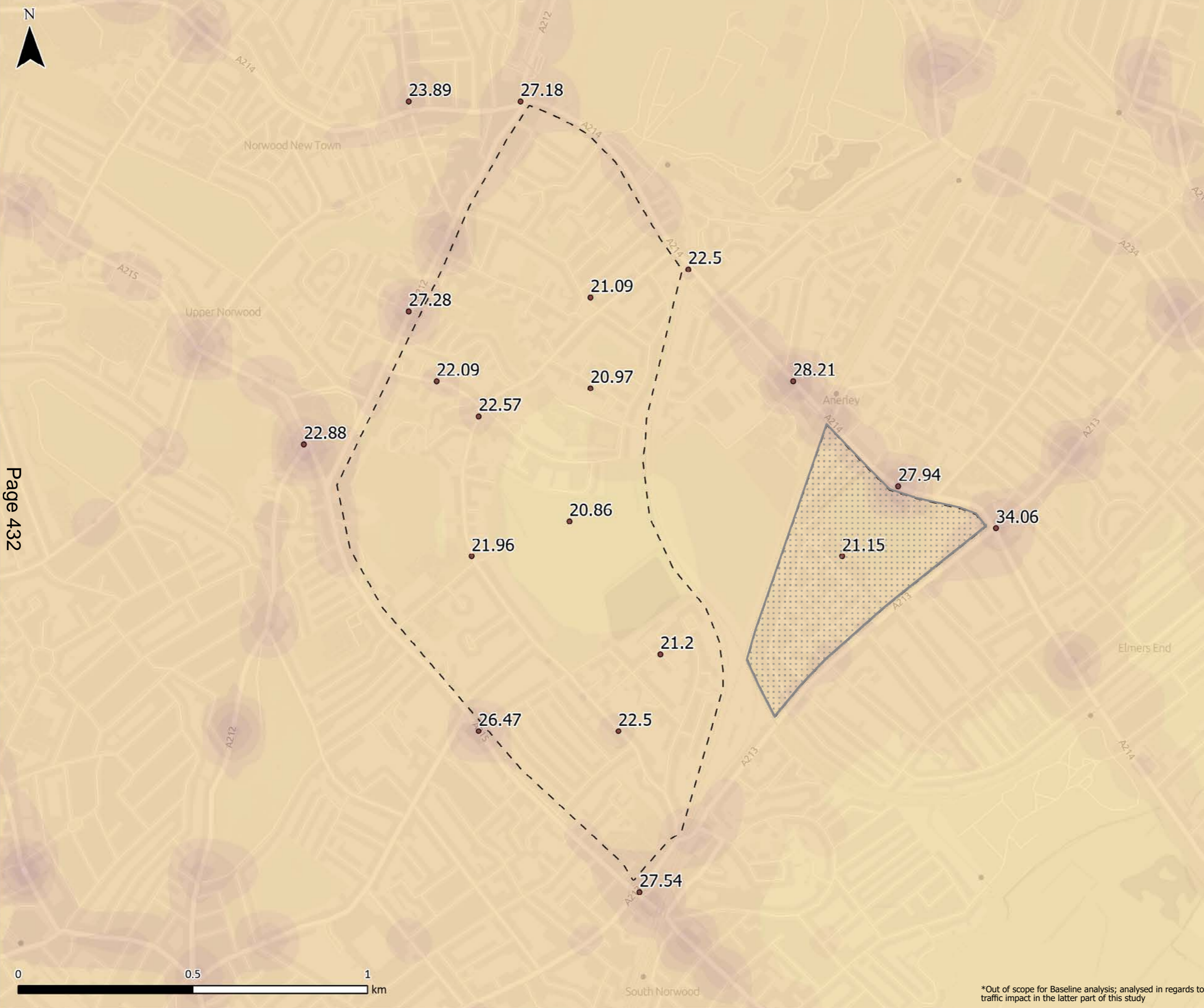
PM2.5

Similar to PM10, the PM2.5 concentrations in and around the temporary LTN are within the UK legal limit (25 $\mu\text{g}/\text{m}^3$), ranges from 12 to 17 $\mu\text{g}/\text{m}^3$. However these figures are still higher than the WHO guideline limit of 10 $\mu\text{g}/\text{m}^3$. Concentrations within the temporary LTN ranges around 12-13 $\mu\text{g}/\text{m}^3$.

NO2

Unlike PM10 and PM2.5, the UK's NO2 legal limit is the same as the WHO's guideline limit (40 $\mu\text{g}/\text{m}^3$). Despite most parts of the temporary LTN are showing concentrations that are within the legal limit, most boundary roads have exceeded the limit, showing a range from around 40 to 70 $\mu\text{g}/\text{m}^3$.

Notably, Sylvan Hill has shown considerably higher concentrations (36-37 $\mu\text{g}/\text{m}^3$) than the surrounding areas. The surrounding areas show figures between 32 and 35 $\mu\text{g}/\text{m}^3$.



Data from London Atmospheric Emission Inventory, showing modelled 2016 ground level concentrations

Contains GLA and other public sector information licensed under the OGL v3.0.

Contains OS data © Crown Copyright and database right 2020

Contains data from OS Zoomstack

PJA  The Aquarium
King Street
Reading
RG1 2AN
T. 0118 956 0909

CLIENT

London Borough of Croydon

PROJECT

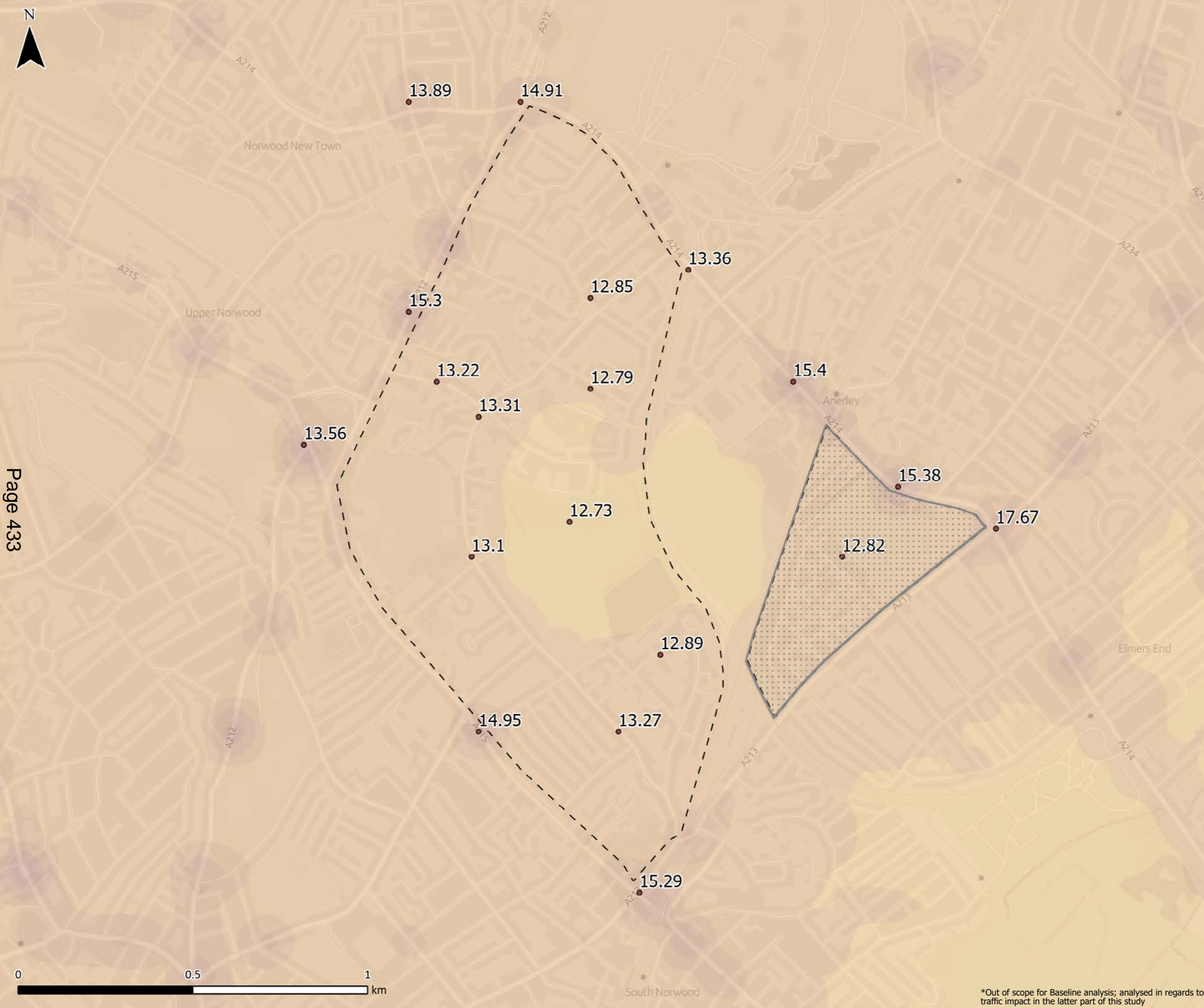
Crystal Palace & South Norwood LTN

TITLE

AIR QUALITY - PM10 CONCENTRATIONS

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:10,000	JY	-	10/11/2020
FIGURE NUMBER	REVISION		
3	-		

*Out of scope for Baseline analysis; analysed in regards to traffic impact in the latter part of this study



Temporary Crystal Palace & South Norwood LTN

Neighbourhood 2*

Annual Mean PM2.5 Concentrations 2016

µg/m3

- ≤ 11.25
- ≤ 11.48
- ≤ 11.63
- ≤ 11.75
- ≤ 11.83
- ≤ 11.88
- ≤ 11.96
- ≤ 12.07
- ≤ 12.23
- ≤ 12.46
- ≤ 12.78
- ≤ 13.23
- ≤ 13.88
- ≤ 14.8
- ≤ 16.1
- ≤ 17.95
- ≤ 20.57
- ≤ 24.29
- ≤ 29.58
- ≤ 37.09

WHO guideline limit (10 µg/m3)

UK legal limit (25 µg/m3)

Data from London Atmospheric Emission Inventory, showing modelled 2016 ground level concentrations

Contains GLA and other public sector information licensed under the OGL v3.0.

Contains OS data © Crown Copyright and database right 2020

Contains data from OS Zoomstack

PJA 

The Aquarium
King Street
Reading
RG1 2AN
T. 0118 956 0909

CLIENT

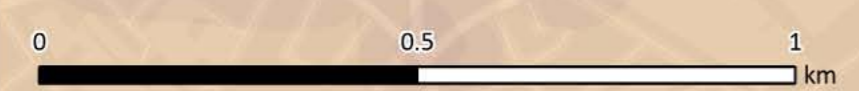
London Borough of
Croydon

PROJECT

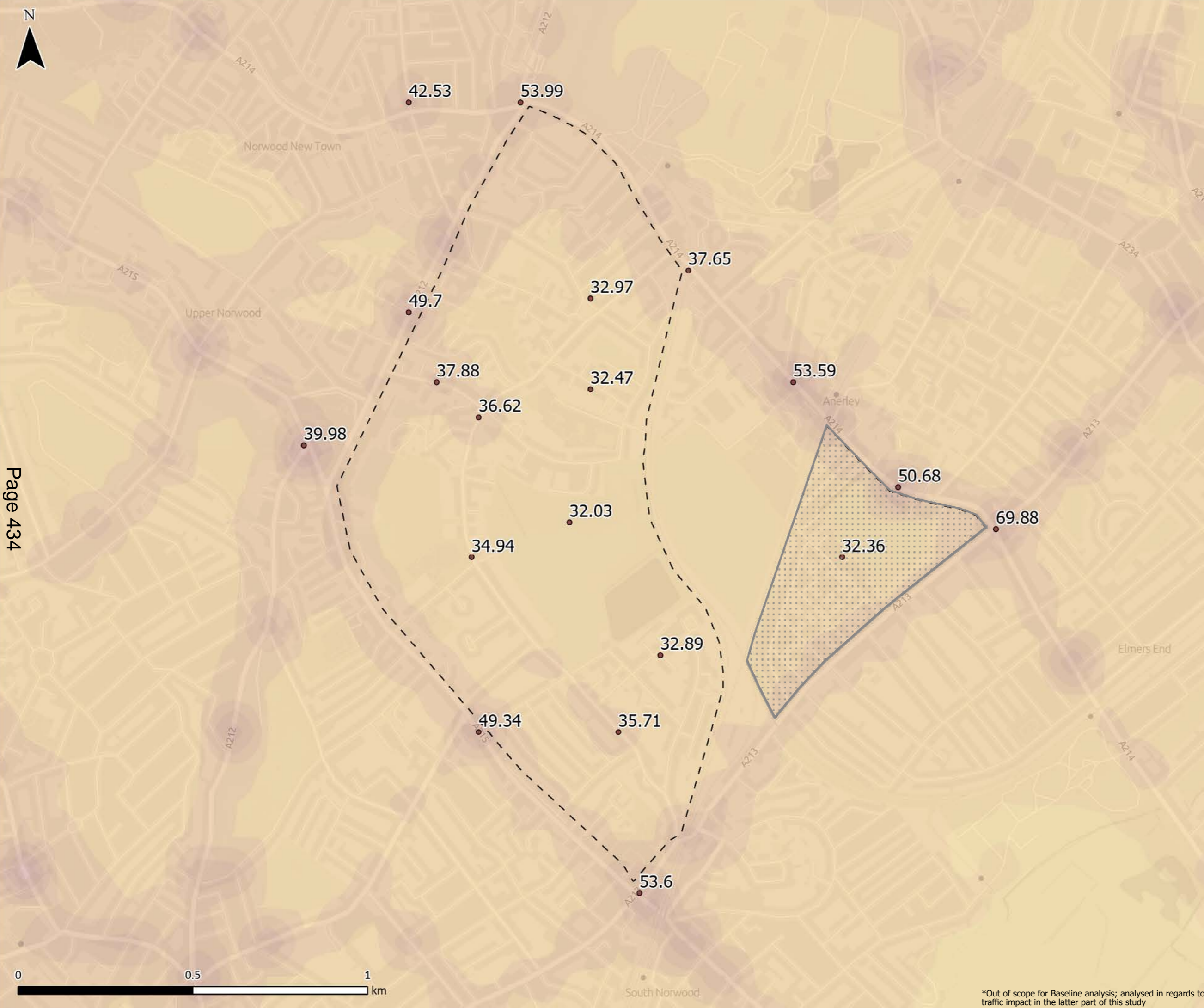
Crystal Palace &
South Norwood LTN

TITLE

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:10,000	JY	JMQ	10/11/2020
FIGURE NUMBER	REVISION		
4			



*Out of scope for Baseline analysis; analysed in regards to traffic impact in the latter part of this study



Temporary Crystal Palace & South Norwood LTN

Neighbourhood 2*

Annual Mean NO₂ Concentrations 2016 µg/m³

- ≤ 31.28
- ≤ 33.45
- ≤ 36.52
- ≤ 40.89
- ≤ 47.08
- ≤ 55.87
- ≤ 68.35

UK legal & WHO guideline limit (40 µg/m³)

Data from London Atmospheric Emission Inventory, showing modelled 2016 ground level concentrations

Contains GLA and other public sector information licensed under the OGL v3.0.

Contains OS data © Crown Copyright and database right 2020

Contains data from OS Zoomstack

PJA  The Aquarium
King Street
Reading
RG1 2AN
T. 0118 956 0909

CLIENT

London Borough of Croydon

PROJECT

Crystal Palace & South Norwood LTN

TITLE

AIR QUALITY - NO₂ CONCENTRATIONS

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:10,000	JY	JMQ	10/11/2020
FIGURE NUMBER	REVISION		
5			

*Out of scope for Baseline analysis; analysed in regards to traffic impact in the latter part of this study

3

TRAFFIC ANALYSIS

3 TRAFFIC ANALYSIS

This chapter presents analysis on traffic effects in relation to the introduction of the temporary LTN. It includes analyses in the following three areas:

1. Estimated through traffic levels
2. Estimated traffic flows
3. Journey time difference

Comparisons have been drawn using data collected before and during the temporary LTN implementation.

This chapter begins with understanding the current traffic management measures, followed by an overview of road works that took place near the temporary LTN between March and October 2020, which may have affected traffic conditions aside of the temporary LTN measures.

Widened scope for traffic analysis

LB Croydon has received feedback from LB Bromley regarding potential traffic displacement onto Selby Road and Seymour Villas.

For the purpose of this traffic analysis, we have incorporated this neighbourhood extent into our scope of study (it is referred as 'Neighbourhood 2').

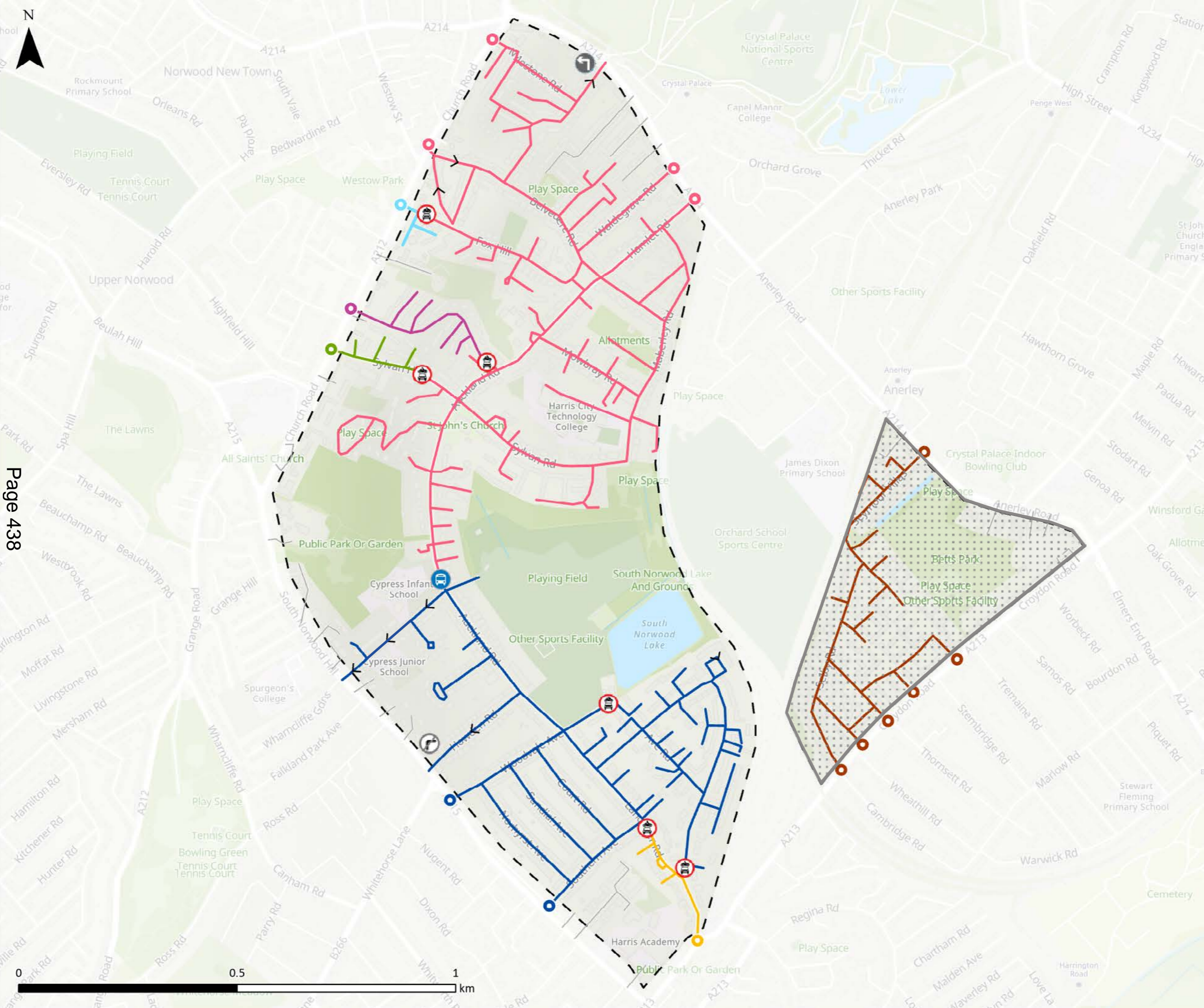
TRAFFIC MANAGEMENT MEASURES (DURING LTN)

Chapter 1 presented an overview of the temporary LTN measures that were introduced between May and August 2020.

To understand how these measures affect vehicle access, the plan overleaf shows that the measures have divided the temporary LTN into seven sub zones. The vehicle entry points for each zone are also presented.

It is noted that the number of entry points to most sub zones is proportionate to their size. For instance, there are four entry points from two boundary roads (Church Road and Anerley Road) for sub zone A (shown in pink colour), which is the largest of all sub zones. The second largest in the temporary LTN, sub zone B (shown in blue colour), has two entry points along South Norwood Hill.

All streets within the LTN areas remain accessible by motor vehicles.



- Temporary Crystal Palace & South Norwood LTN
- ▤ Neighbourhood 2
- Turn Restriction**
- ⤴ Mandatory Left Turn
- ⊘ Banned Right Turn
- LTN Measures**
- ⊘ Modal filter
- ⊘ Bus Gate
- Sub LTN Zones (and Entry Points)**
- A (4)
- B (2)
- C (1)
- D (1)
- E (1)
- F (1)
- G (6)
- Single access only

Contains public sector information licensed under the OGL v3.0
 Contains OS Data © Crown Copyright and database right 2019
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack, Contains OS data © Crown Copyright and database right 2019

PJA  The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon

PROJECT
Auckland Road LTN

TITLE
DURING LTN IMPLEMENTATION - SUB ZONE AND ENTRY POINTS

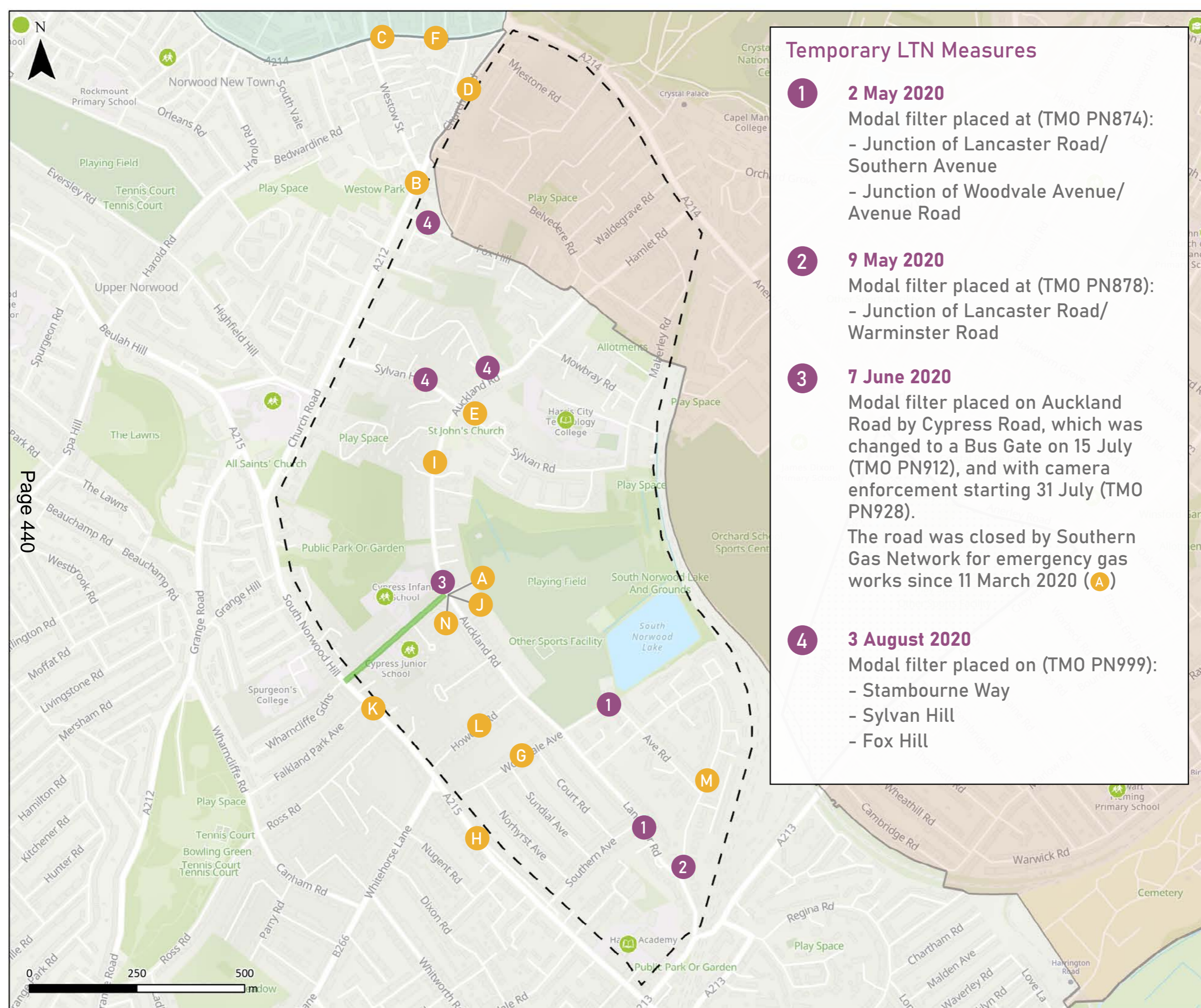
SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,000	JY	-	27/11/2020
FIGURE NUMBER	REVISION		
13			

ROAD WORKS AND TEMPORARY LTN MEASURES TIMELINE

A series of road works were conducted in close proximity to the temporary LTN, which has posed difficulties in measuring and deducing the direct effects caused by the temporary LTN. In consideration we have compiled the list of road works in chronological order, and plotted alongside the temporary LTN measures on the plan overleaf.

Road works

- A** **11 March - 6 June 2020**
Auckland Road
Emergency gas works. One way working was introduced on Cypress Road, and on Auckland Road west-bound towards South Norwood Hill
- B** **22 March - 1 November 2020**
Church Road
A car crashed into a candle shop at 111 Church Road. The southbound lane located to the south of the junction with Westow Street was blocked by scaffolding for seven months. Temporary signals were in place.
- C** **29 April - 5 May 2020**
Westow Hill
Water works. A lane by 2 Westow Hill was closed.
- D** **13 - 16 May 2020**
Church Road
Water works. Entire road was closed, closure point by No. 49.
- E** **26 - 29 May 2020**
Sylvan Road
Urgent gas works. Traffic control with priority working in operation, by St Johns Church on Sylvan Road.
- F** **20 - 26 June 2020**
Westow Hill
Water works. Entire road was closed.
- G** **23 July 2020**
Woodvale Avenue
Carriageway resurfacing works. Entire road was closed.
- H** **28 August - 7 September 2020**
South Norwood Hill
Power works. Traffic control with two-way signals in operation, by 126 South Norwood Hill.
- I** **23 - 29 September 2020**
Auckland Road
Water works. Give-and-take traffic Control in operation, outside No. 98.
- J** **1 - 7 October 2020**
Auckland Road
Water works. Traffic control with multi-way signals in operation, at J/O Cypress Road with Auckland Road
- K** **13 - 19 October 2020**
South Norwood Hill
Water works. Traffic control with multi-way signals in operation, outside No. 153.
- L** **13 - 19 October 2020**
Howden Road
Water works. Entire road was closed, closure point by No. 16.
- M** **26 - 28 October 2020**
Warminster Road
Carriageway resurfacing works. Closure between J/W Warminster Square to J/W Lancaster Road.
- N** **28 - 30 October 2020**
Auckland Road
Water works. Traffic control with multi-way signals in operation, at J/O Cypress Road with Auckland Road.



Temporary LTN Measures

- 1 2 May 2020**
 Modal filter placed at (TMO PN874):
 - Junction of Lancaster Road/
 Southern Avenue
 - Junction of Woodvale Avenue/
 Avenue Road
- 2 9 May 2020**
 Modal filter placed at (TMO PN878):
 - Junction of Lancaster Road/
 Warminster Road
- 3 7 June 2020**
 Modal filter placed on Auckland
 Road by Cypress Road, which was
 changed to a Bus Gate on 15 July
 (TMO PN912), and with camera
 enforcement starting 31 July (TMO
 PN928).
 The road was closed by Southern
 Gas Network for emergency gas
 works since 11 March 2020 (A)
- 4 3 August 2020**
 Modal filter placed on (TMO PN999):
 - Stambourne Way
 - Sylvan Hill
 - Fox Hill

- Temporary Crystal Palace & South Norwood LTN
- Borough Boundary
- LB Bromley
- LB Lambeth
- School Street scheme on Cypress Road (since Feb 2020)
- LTN Measures**
- 🚫 Modal filter
- 🚌 Bus Gate
- Schools**
- 🎒 Primary
- 🎒 Secondary
- 🎒 Independent/ Other
- 🎒 College and University

Contains OpenStreetMap data © OpenStreetMap contributors
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack, Contains OS data © Crown
 Copyright and database right 2019

PJA  The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon

PROJECT
Crystal Palace & South Norwood LTN

TITLE
LTN SCHEME OVERVIEW

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,000	JY	JMQ	20/11/2020
FIGURE NUMBER	REVISION		
8			

3.1 ESTIMATED THROUGH TRAFFIC LEVELS

This section analyses which road segments within the temporary LTN were amongst the most affected by through traffic, and whether the situation has improved since the measures have been installed.

Two sets of through traffic data have been retrieved and collected, representing the time periods before and during the temporary LTN measures were introduced:

- 'Before LTN': February 2019 - March 2020
- 'During LTN': June 2020 - November 2020

It is worth noting that the period included as 'Before LTN' precede the period when the temporary signals were in use on Church Road (the road work specified as **B** on page 34). The temporary signals were in use on Church Road for the entire period of 'During LTN'.

Methodology

The through traffic data was supplied by The Floop, a telematics company, which collected the raw traffic data using telematics technology. Having applied a method called the Blend Analysis to identify through traffic levels, the company identified the origin and destination for each journey in terms of LSOA, a geospatial statistical unit for small area statistics.

The Floop repeated this process for several

time periods, in this case, the daily average, AM and PM peak periods. The analysis classifies the trip travel under the following three categories:

- Exclusively internal to the cell ('In-In'), with both origin and destination located within the cell
- Exclusively external to the cell ('Out-Out'), with both origin and destination located out of the cell
- Involves either an origin ('In-Out') or destination ('Out-In') inside of the cell only. These are trips with a purpose related to the cell, i.e. by people who live, work, spend time in, or deliver to the cell.

Through traffic is defined as the 'Out-Out' trips, with trip purposes unrelated to the cell.

The occurrences of segments within journeys were then tallied in terms of the category of trip travel, and were stored as a percentage of all journeys.

An estimated general traffic flow per hour is also provided for each road segment by direction. This data is approximated by extrapolating the telematic data with traffic flow counts obtained from Department for Transport. Using this traffic flow estimate, we then multiply by the through traffic percentage to calculate an estimated through traffic flow for each road segment per hour, per direction.

Limitations

Due to data sampling limitations, the dataset representing 'During LTN' includes data recorded starting from June 2020, when some measures have not yet been put in place. It might therefore present a view of the situation that is not the most up-to-date. We have taken this into account when interpreting the data.

In addition, telematics uses vehicle tracking (black box) and GPS location data to identify type of trip travel. It relies on engine activity to determine the start or end of trip. Therefore, separate trips but with the engine kept running in between would be considered as one single trip, e.g. a food delivery if the engine is left running. These characteristics might render potential, albeit small, inaccuracy to the through traffic percentage data.

Whilst a traffic flow estimate was generated for every road segment, it was modelled using counts from scattered locations across the road network. Hence, it is highlighted that they cannot be fully accurate to the actual flows and should be interpreted as an approximation.

In the following analyses, we have reviewed the before-and-during through traffic levels in terms of daily average, then by peak period.



Advanced warning sign for bus gate on Auckland Road



Advanced warning sign for bus gate and modal filters on Auckland Road



Fox Hill modal filter



Bus gate on Auckland Road



Public consultation notice for the temporary LTN scheme



Advanced warning sign for the camera enforcement of bus gate on Auckland Road

TRAFFIC ANALYSIS

AVERAGE WEEKDAY DAILY THROUGH TRAFFIC (BEFORE LTN)

The estimated flows of average daily (12-hour average, 7am-7pm) through traffic on weekdays, before the temporary LTN was introduced, is shown overleaf.

The Hamlet Road-Auckland Road-Lancaster Road route had been a popular through traffic route before the temporary LTN was introduced. Given it is a direct north-south route parallel to the boundary roads (Church Road and South Norwood Hill), it was heavily used by 70-170 through traffic vehicles per hour (vph) in both directions, across an average weekday.

Waldegrave Road northbound was also frequently used by through traffic (circa 60 vph), as an alternative way out of the north-south route.

A few more roads within the temporary LTN had been frequently used by through traffic as well:

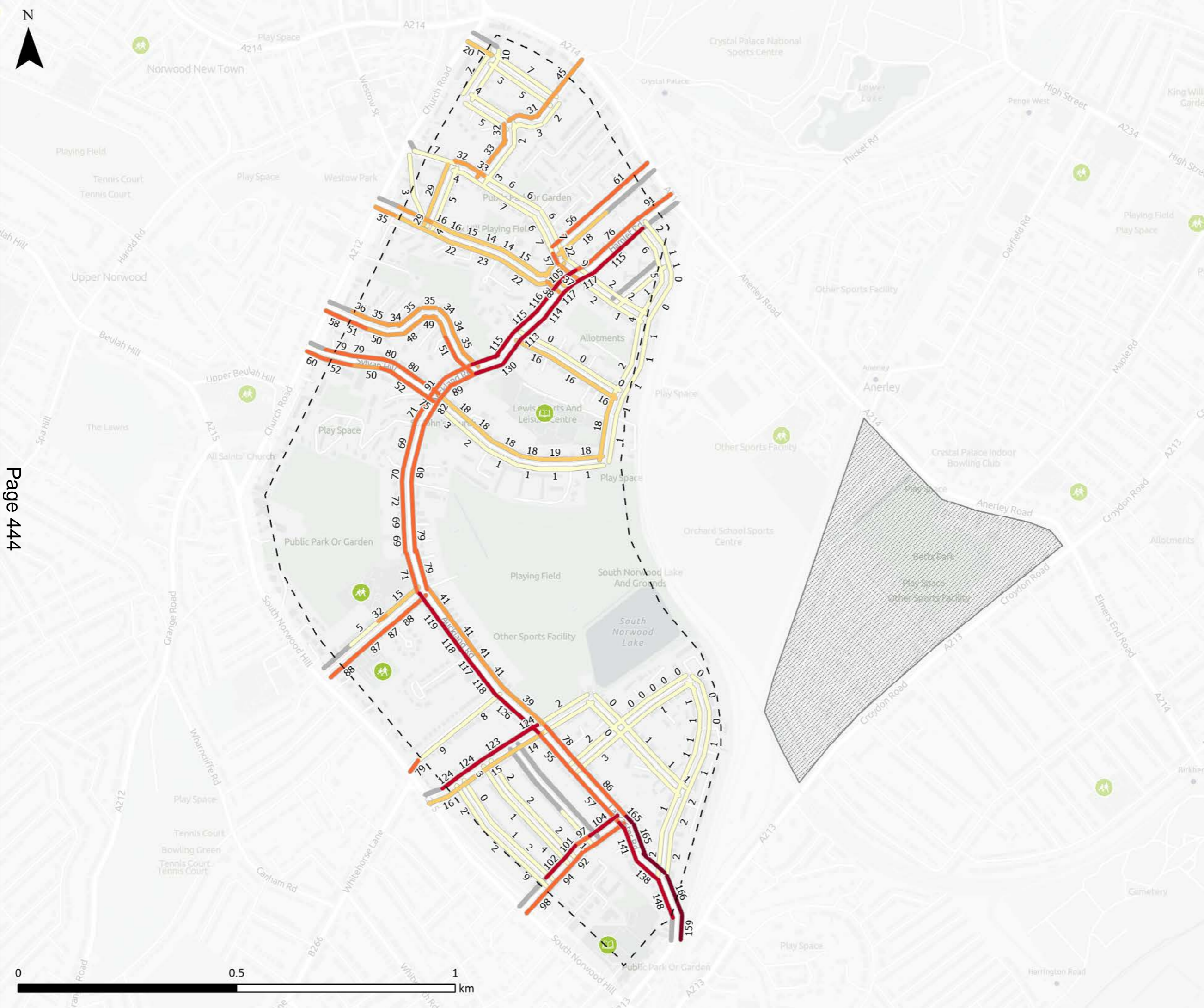
- Stambourne Way (30-60 vph, both directions)
- Sylvan Hill (60-80 vph, both directions)
- Cypress Road (circa 80 vph westbound)

- Woodvale Avenue (circa 120 vph eastbound)
- Southern Avenue (90-105 vph, both directions)

These five roads were used as the connecting routes between the boundary roads and Auckland Road.

Speeding issue on Auckland Road

Besides, according to Speedvisor data, collected in August 2019, the average speed on Auckland Road is 21.16 mph, exceeding the speed limit of 20mph. An average of 62.9% of vehicles speeded over the limit. The 85th percentile speed (the speed at which the data shows 85% of vehicles were travelling at or below) is 25 mph.



--- Temporary Crystal Palace & South Norwood LTN

▨ Neighbourhood 2

Schools

- 🌳 Primary
- 🏫 Secondary
- 🟢 Independent/ Other

Average Weekday Daily Through Traffic within LTN (Before)

Approx. no. of vehicle/ hour

- 🟡 ≤10
- 🟠 ≤30
- 🟡 ≤50
- 🟠 ≤100
- 🔴 ≤150
- 🔴 ≤200
- ⚪ Data Unavailable

*Daily' means 12-hour average taken between 7am-7pm
 Traffic data obtained from Floop
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

PJA  The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon

PROJECT
Crystal Palace & South Norwood LTN

TITLE

AVERAGE WEEKDAY DAILY THROUGH TRAFFIC WITHIN LTN (BEFORE LTN)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,000	JY	-	05/12/2020
FIGURE NUMBER	REVISION		
16	A		

AVERAGE WEEKDAY DAILY THROUGH TRAFFIC (DURING LTN)

The plan on the opposite page shows a clear reduction of through traffic within the temporary LTN, during the scheme was introduced.

Auckland Road (between Sylvan Hill and Southern Avenue), and Lancaster Road show a significant reduction in through traffic. Similar reductions have also been recorded on four of the connecting routes to Auckland Road, namely Stambourne Way, Cypress Road, Woodvale Avenue and Southern Avenue.

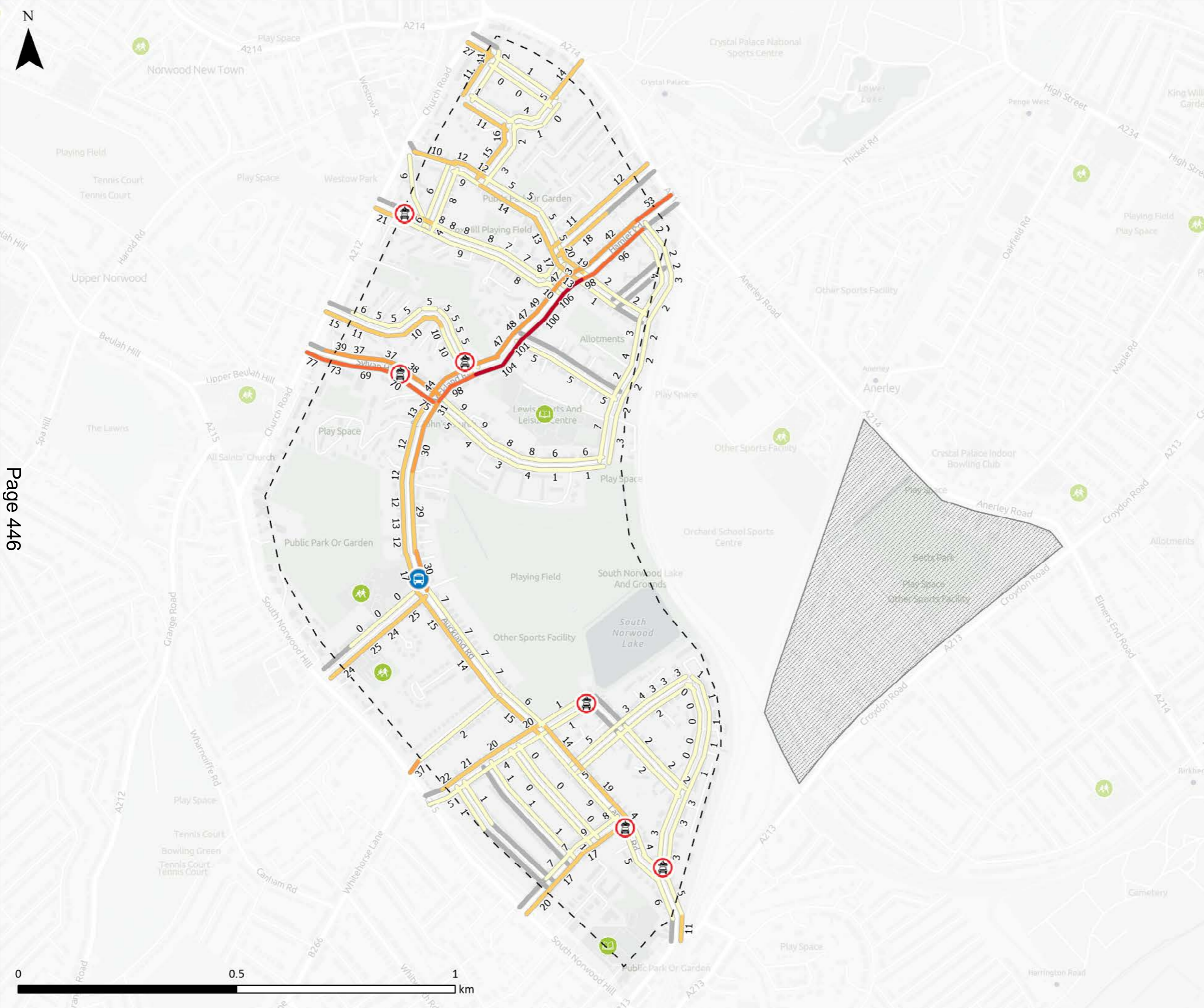
Notably, Cypress Road, where Cypress Primary School is located, has recorded about 75% decrease in through traffic volume. This might partly be attributed to the School Street scheme enforced since February 2020.

An anomaly can be spotted on these plans. While the data shows that through traffic has been halved on the northbound direction of Hamlet Road-Auckland Road (northern section)-Sylvan Hill, the southbound direction on these roads appears still being used heavily by through traffic. However, given that the modal filter on Sylvan Hill was installed in early August and has since been intact, the

data shown may have reflected the trends from the period between June and August. In a case which the data is the most up-to-date, through traffic should not be shown at all along this route.

To explain further, as Auckland Road has been closed due to emergency gas works since March, Cypress Road, Woodvale Avenue and Southern Avenue became unattractive for through traffic since then. In contrast, Hamlet Road-Auckland Road (northern section)-Sylvan Hill continued to be an attractive through traffic route to avoid the Anerley Hill/ Church Road junction, up until Sylvan Hill was closed in August. This is a possible explanation for why the data only shows through traffic on one stretch but not the other ones.

Nevertheless, we recommend LB Croydon to verify the actual situation along this section of roads using Automatic Traffic Counters (ATCs). We have included this recommendation in the conclusions.



- Temporary Crystal Palace & South Norwood LTN
- Neighbourhood 2
- LTN Measures**
- Modal Filter
- Bus Gate
- Schools**
- Primary
- Secondary
- Independent/ Other
- Average Weekday Daily Through Traffic within LTN (After)**
- Approx. no. of vehicle/ hour**
- ≤10
- ≤30
- ≤50
- ≤100
- ≤150
- ≤200
- Data Unavailable

'Daily' means 12-hour average taken between 7am-7pm
 Traffic data obtained from Floop
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

PJA The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon

PROJECT
Crystal Palace & South Norwood LTN

TITLE

AVERAGE WEEKDAY DAILY THROUGH TRAFFIC WITHIN LTN (DURING LTN)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,000	JY	-	05/12/2020
FIGURE NUMBER	REVISION		
16	A		

COMPARISON BETWEEN AM PEAK AND PM PEAK

The 'before' and 'during' plans, showing the average weekday through traffic for both AM peak (7-10am) and PM peak (4-7pm) periods, are presented in the next four pages:

- Before, AM peak (page 43)
- Before, PM peak (page 44)
- During, AM peak (page 45)
- During, PM peak (page 46)

A table showing comparison of through traffic volume before and during LTN is also presented by peak period, within the plan opposite.

Before LTN

Similar patterns can be found for both AM and PM peaks before the temporary LTN. The Hamlet Road-Auckland Road-Lancaster Road route had been a popular through traffic route for both AM and PM peaks, with a through traffic volume of at least 150 vph. Stambourne Way, Sylvan Hill, Cypress Road, Woodvale Avenue and Southern Avenue, as well as Tudor Road-Cintra Park, also served as the main through traffic connections between Auckland Road and the boundary roads in both peak periods. These roads carried at least 50 vph of through traffic volumes.

Nevertheless, there are variations in through traffic volume between AM and PM peaks. AM peak generally recorded less through traffic than the PM peak on majority of the roads. One of the exceptions had been the loop of Woodvale Avenue-Auckland Road-Cypress Road. The circa 200 vehicles in the AM peak recorded on this route could be attributed to the 'school run traffic' associated with Cypress Primary School.

Another exception for a higher volume in the AM peak (150-200 vph) can also be spotted on Lancaster Road-Southern Avenue heading south, which could be contributed by traffic seeking to avoid the South Norwood Hill/High Street junction. The prevailing direction of through traffic can be seen reversed to head north in the PM peak.

During LTN

In line with the trends shown in the daily average, through traffic in the temporary LTN have generally been significantly reduced on both AM and PM peaks since the measures were installed.

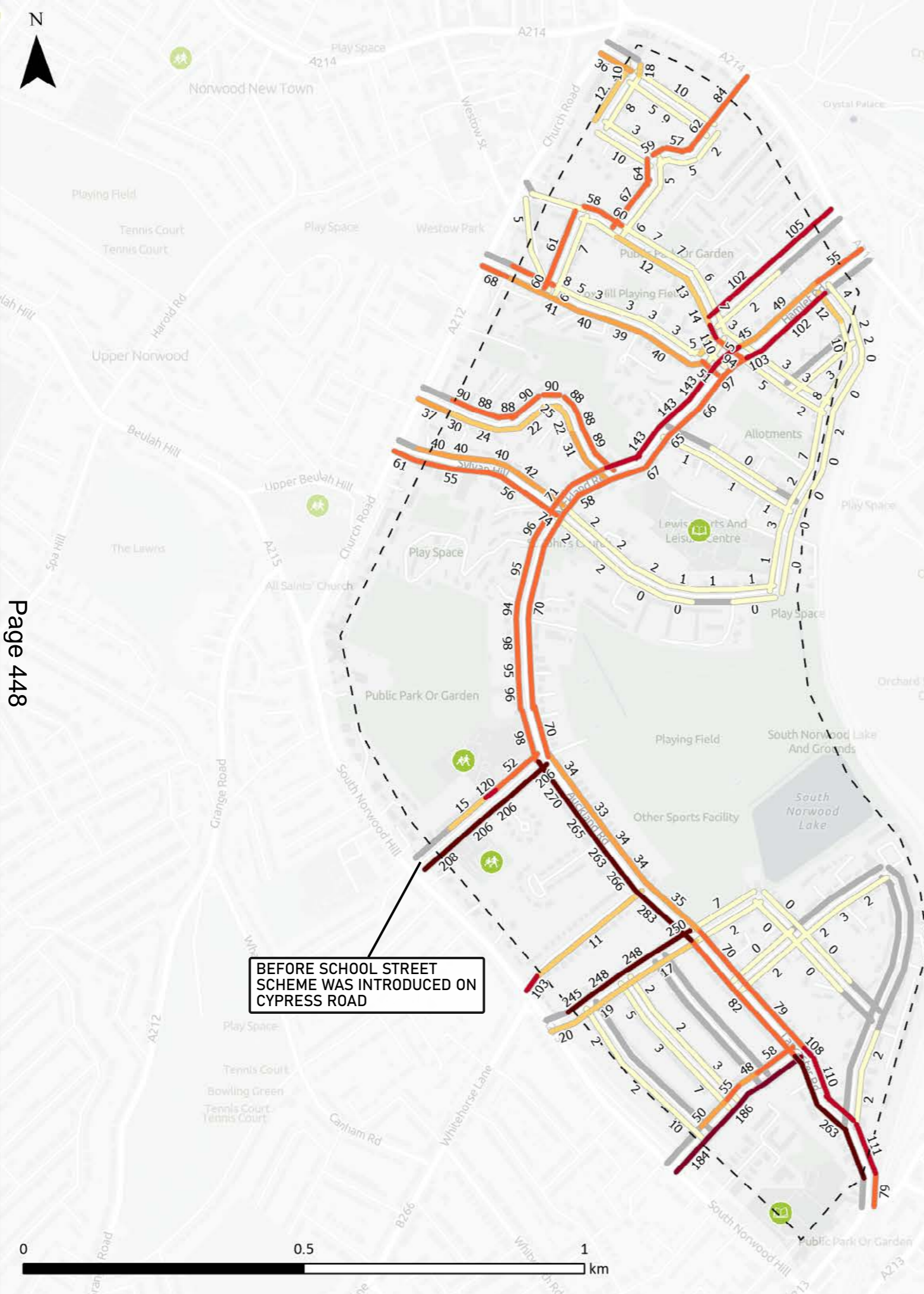
Same as the daily average data, an anomaly appears on Hamlet Road, Auckland Road (northern section) and Sylvan Hill for both AM and PM peak periods.

Apart from the roads mentioned above, through traffic volume in AM peak reduced

to less than or around 10 vph. PM peak saw slightly more through traffic remaining in the area, with the volume generally reduced to below or around 20 vph on most roads. More reductions was recorded in the PM peak, given the fact that it had more through volume before the temporary LTN has been in place.

Auckland Road section between Sylvan Hill and Cypress Road is the only route connecting the northern and southern part of the temporary LTN. For the northbound, it shows a reduction of 88vph in the AM peak, and 112 vph for the PM peak. For the southbound, it shows a reduction of 46 vph in the AM peak and 118 vph in the PM peak.

The loop of Woodvale Avenue-Auckland Road-Cypress Road, located by Cypress Primary School, saw only about 10 vph of through traffic in the AM peak. However, the figures jumped up to around 40 vph for the PM peak, possibly due to the school street restriction only being enforced until 4pm.



Roads commonly used by through traffic within LTN (excluding roads with anomaly)		AM Peak		PM Peak	
		Before (vph)	During (vph)	Before (vph)	During (vph)
Waldegrave Road	NB	105	8	96	15
Cintra Park-Tudor Road	NB	84	4	29	0
Stambourne Way	WB	37	12	99	33
	EB	90	0	20	12
Auckland Road (Sylvan Hill-Cypress Road)	NB	96	8	132	20
	SB	70	24	155	37
Cypress Road	WB	206	12	87	37
Auckland Road (Cypress Road-Woodvale Avenue)	NB	283	8	158	28
	SB	38	12	88	5
Woodvale Avenue	WB	20	8	96	30
	EB	55	4	201	6
Southern Avenue	WB	20	8	96	26
Lancaster Road	NB	263	4	182	9
	SB	111	4	364	7

- Temporary Crystal Palace & South Norwood LTN
- Neighbourhood 2
- Schools
 - Primary
 - Secondary
 - Independent/ Other
- Average Weekday AM Peak Through Traffic within LTN (Before)
 - Approx. no. of vehicle/ hour
 - ≤10
 - ≤30
 - ≤50
 - ≤100
 - ≤150
 - ≤200
 - ≤300
 - Data Unavailable

'AM peak' means 3-hour average taken between 7-10am
 Traffic data obtained from Floop
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

PJA The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

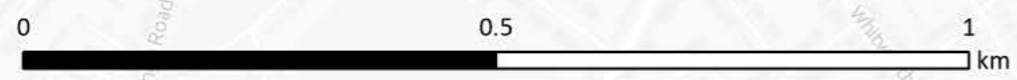
CLIENT
London Borough of Croydon

PROJECT
Crystal Palace & South Norwood LTN

TITLE

AVERAGE WEEKDAY AM PEAK THROUGH TRAFFIC WITHIN LTN (BEFORE)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,000	JY	-	05/12/2020
FIGURE NUMBER	REVISION		
29			





- - - Temporary Crystal Palace & South Norwood LTN
 [Hatched Box] Neighbourhood 2
Schools
 [Green Star Icon] Primary
 [Green Building Icon] Secondary
 [Green Circle Icon] Independent/ Other
Average Weekday PM Peak Through Traffic within LTN (Before)
 Approx. no. of vehicle/ hour
 [Light Yellow Line] ≤10
 [Yellow Line] ≤30
 [Orange Line] ≤50
 [Dark Orange Line] ≤100
 [Red Line] ≤150
 [Dark Red Line] ≤200
 [Brown Line] ≤400
 [Grey Line] Data Unavailable

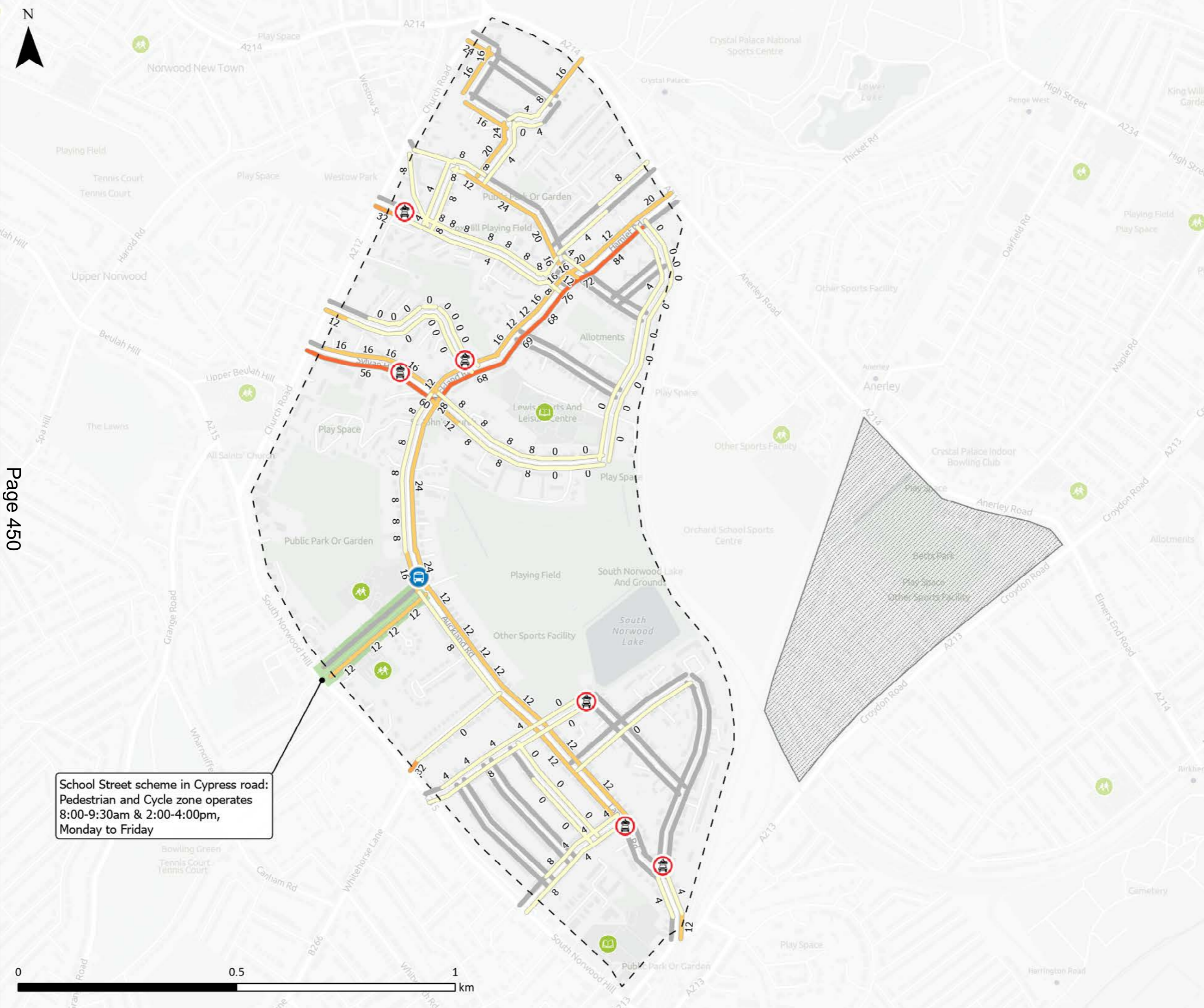
'PM peak' means 3-hour average taken between 4-7pm
 Traffic data obtained from FLOW
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

PJA 
 The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon
 PROJECT
Crystal Palace & South Norwood LTN
 TITLE

AVERAGE WEEKDAY PM PEAK THROUGH TRAFFIC WITHIN LTN (BEFORE)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,000	JY	-	05/12/2020
FIGURE NUMBER	REVISION		
31			



- - - Temporary Crystal Palace & South Norwood LTN

▨ Neighbourhood 2

LTN Measures

🚫 Modal Filter

🚌 Bus Gate

🏫 School Street scheme on Cypress Road (since Feb 2020)

Schools

🌳 Primary

🏫 Secondary

🟢 Independent/ Other

Average Weekday AM Peak Through Traffic within LTN (During)

Approx. no. of vehicle/ hour

🟡 ≤10

🟠 ≤30

🔴 ≤50

🟠 ≤100

🔴 ≤150

🟠 ≤200

🔴 ≤300

⚪ Data Unavailable

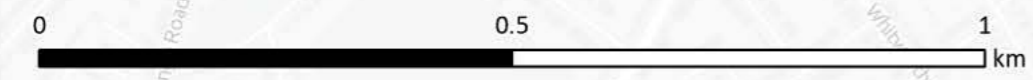
'AM peak' means 3-hour average taken between 7-10am
 Traffic data obtained from FLOW
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

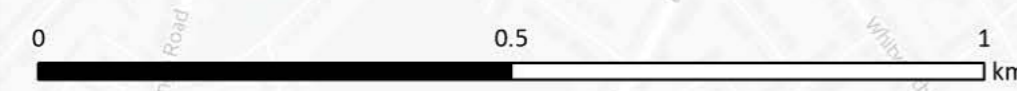
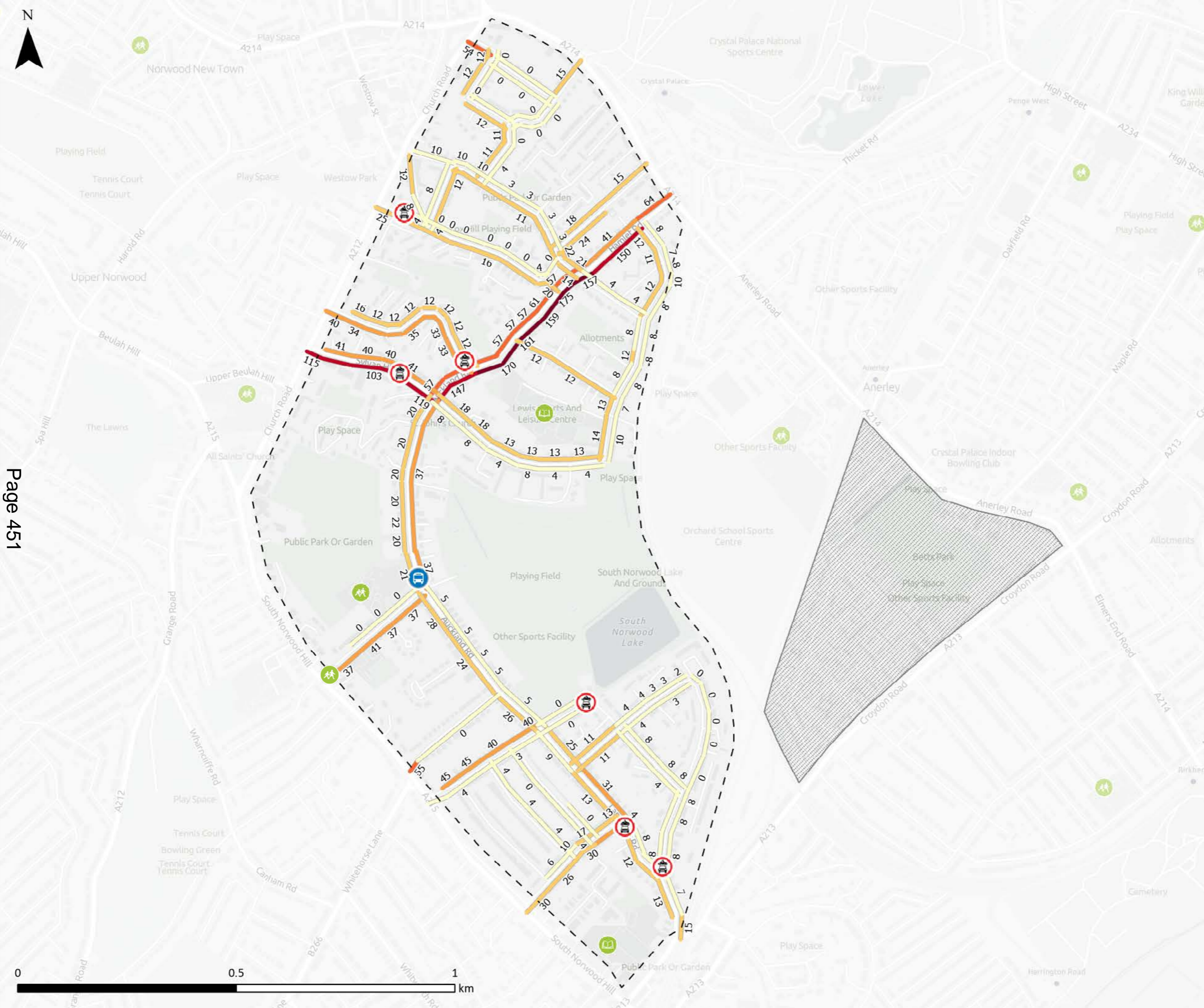
PJA  The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon
 PROJECT
Crystal Palace & South Norwood LTN
 TITLE

AVERAGE WEEKDAY AM PEAK THROUGH TRAFFIC WITHIN LTN (DURING)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,000	JY	-	05/12/2020
FIGURE NUMBER	REVISION		
30			





- Temporary Crystal Palace & South Norwood LTN
- Neighbourhood 2
- LTN Measures**
- Modal Filter
- Bus Gate
- Schools**
- Primary
- Secondary
- Independent/ Other
- Average Weekday PM Peak Through Traffic within LTN (During)**
- Approx. no. of vehicle/ hour**
- ≤ 10
- ≤ 30
- ≤ 50
- ≤ 100
- ≤ 150
- ≤ 200
- ≤ 300
- ≤ 400

'PM peak' means 3-hour average taken between 4-7pm
 Traffic data obtained from Floop
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

PJA The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon
 PROJECT
Crystal Palace & South Norwood LTN
 TITLE

AVERAGE WEEKDAY PM PEAK THROUGH TRAFFIC WITHIN LTN (DURING)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,000	JY	-	07/12/2020
FIGURE NUMBER	REVISION		
32			

BLANK PAGE

3.2 ESTIMATED TRAFFIC FLOWS

LB Croydon is keen to understand the degree to which traffic was displaced from within the temporary LTN and onto the nearby A Roads.

The four A Roads surrounding the temporary LTN are:

- Anerley Road (A214)
- High Street-Penge Road (A213)
- South Norwood Hill (A215)
- Church Road (A212)

Traffic concerns have also been raised for roads forming the Crystal Palace Triangle gyratory, namely Church Road (Anerley Hill-Westow Street), Westow Street and Westow Hill.

LB Bromley has also expressed concern about potential traffic displacement onto Selby Road and Seymour Villas.

This section examines the effects on a number of selected roads aforementioned, to understand how the surrounding road network is performing during the introduction of the scheme. The estimated traffic flows used in this analysis were supplied by The Flow, which gathered the flow estimates using telematics technology. Limitations on the data methodology was presented on page 36.

Traffic counts were also conducted between 26 November and 2 December 2020, after the temporary measures were installed, but during the second Lockdown. The results are presented in the Appendix.

CHANGE BEFORE AND DURING LTN (AVERAGE WEEKDAY DAILY FLOWS)

The plan on the page after next (page 50) shows the percentage change in average weekday daily (12-hour average, 7am-7pm) traffic before and during the temporary LTN was introduced. The change in estimated number of vehicle is also shown in the plan, extracted from certain points representative of each road.

While figures within the temporary LTN are also shown on the plan, this part of analysis focuses on the change in traffic flows outside the temporary LTN.

Two plans showing the flow estimates 'before' and 'during' the scheme are also presented on page 51-52.

The change on the selected roads are summarised as follows.

Boundary roads

- Anerley Road saw a reduction between -42 and -127 vph (-8% to -25%) northbound, and

a reduction between -17 and -105 vph (-3% to -20%) southbound.

- High Street-Penge Road saw a change in vehicle flows ranging from +78 to -102 vph (+15% to -17%) eastbound; and from +10 to -142 vph (+3% to -27%) westbound.
- South Norwood Hill saw a change in vehicle flows ranging from +39 to -27 vph (+11 to -5%) northbound; and from +12 to -243 vph (+4 to -42%) westbound.
- Church Road (Westow Street-Beulah Hill) saw a reduction between -42 and -80 vph (-15% to -22%) northbound, and a reduction between -77 and -95 vph (-21% to -29%) southbound.

Crystal Palace Triangle

- Church Road (Anerley Hill-Westow Street), one-way southbound, saw a reduction of -103 vph (-18%).
- Westow Street, one-way northbound, saw a reduction of -48 vph (-10%).
- Westow Hill, one-way eastbound, saw an increase of +33 vph (7%).

Neighbourhood 2

- Selby Road and Seymour Villas saw an increase between +44 and +71 vph (+40% to +68%) northbound; and a change

ranging from +23 to -5 vph (+24% to -5%) southbound.

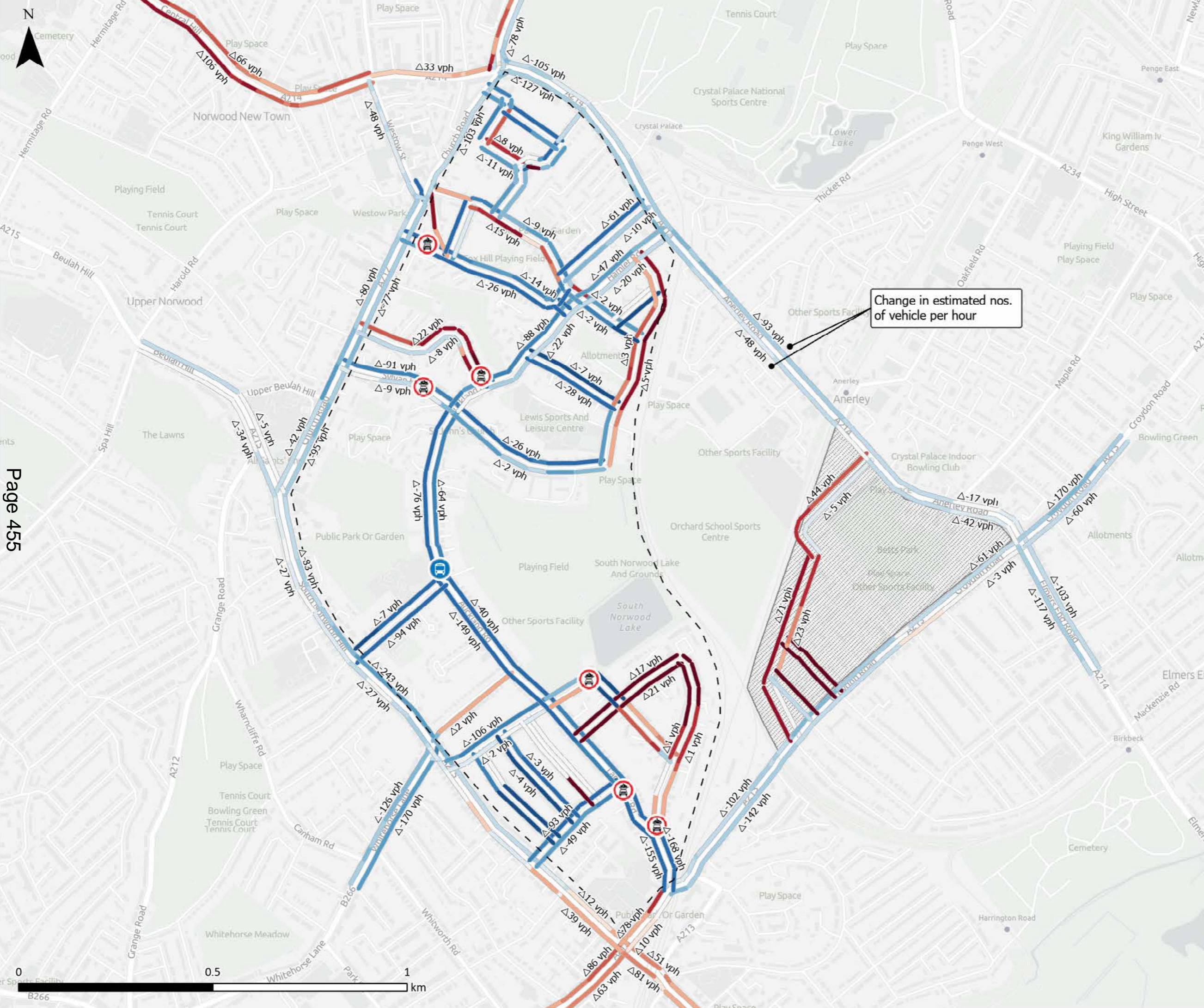
Summary

Overall, the average weekday daily flow estimates show a general reduction of traffic on majority of the roads mentioned above, during the temporary LTN was introduced.

Some increase in traffic can also be noticed on several roads during the temporary LTN was introduced. These include around the High Street/ South Norwood Hill junction, Central Hill, Westow Hill and Selby Road-Seymour Villas within 'Neighbourhood 2'.

The estimated average weekday daily flows have given us a view that was averaged across 12 hours of a typical weekday. To examine the specific time periods when the network takes the most pressure, we have also undertaken analyses on the periods of peak traffic:

- AM peak (page 53)
- PM peak (page 57)



- Temporary Crystal Palace & South Norwood LTN
- ▨ Neighbourhood 2
- LTN Measures**
- 🚫 Modal Filter
- 🚌 Bus Gate
- % Change in Estimated Average Weekday Daily Traffic, Before and During LTN**
- -71-100%
- -56-70%
- -41-55%
- -31-40%
- -21-30%
- -11-20%
- -6-10%
- -1-5%
- 0%
- +1-5%
- +6-10%
- +11-20%
- +21-30%
- +31-40%
- +41-50%
- +51-100%
- >+100%

Change in estimated nos. of vehicle per hour

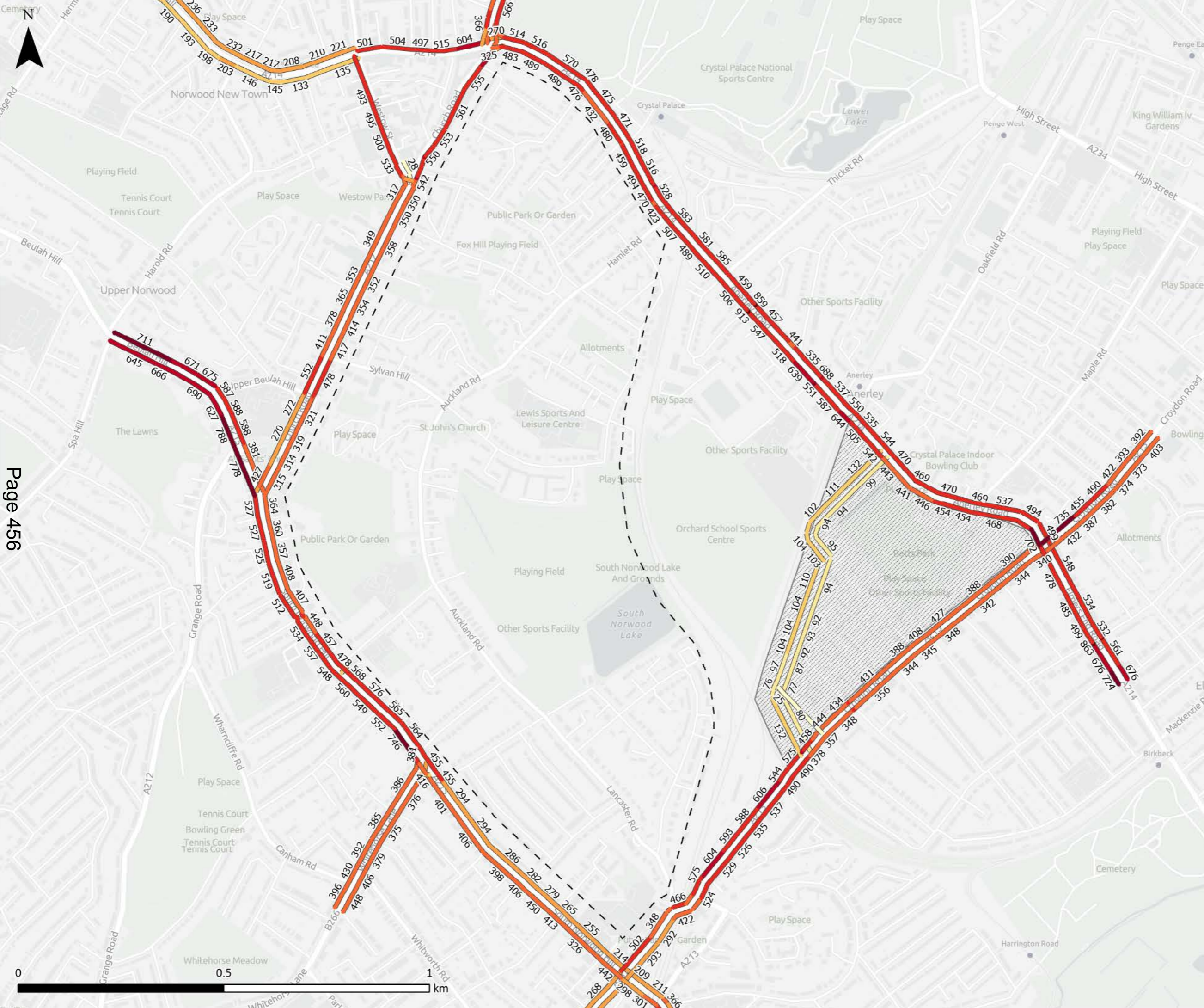
'Daily' means 12-hour average taken between 7am-7pm
 Traffic data obtained from Flow
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

PJA  The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon
 PROJECT
Crystal Palace & South Norwood LTN
 TITLE

CHANGE IN ESTIMATED AVERAGE WEEKDAY DAILY TRAFFIC (BEFORE AND DURING LTN)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:9,000	JY	-	06/12/2020
FIGURE NUMBER	REVISION		
20	-		



Temporary Crystal Palace & South Norwood LTN
 Neighbourhood 2
Average Weekday Daily Traffic Outside LTN (Before)
 Approx. no. of vehicle/ hour
 ≤50
 ≤100
 ≤200
 ≤300
 ≤450
 ≤600
 ≤700
 ≤800
 >800

'Daily' means 12-hour average taken between 7am-7pm
 Traffic data obtained from Flow
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

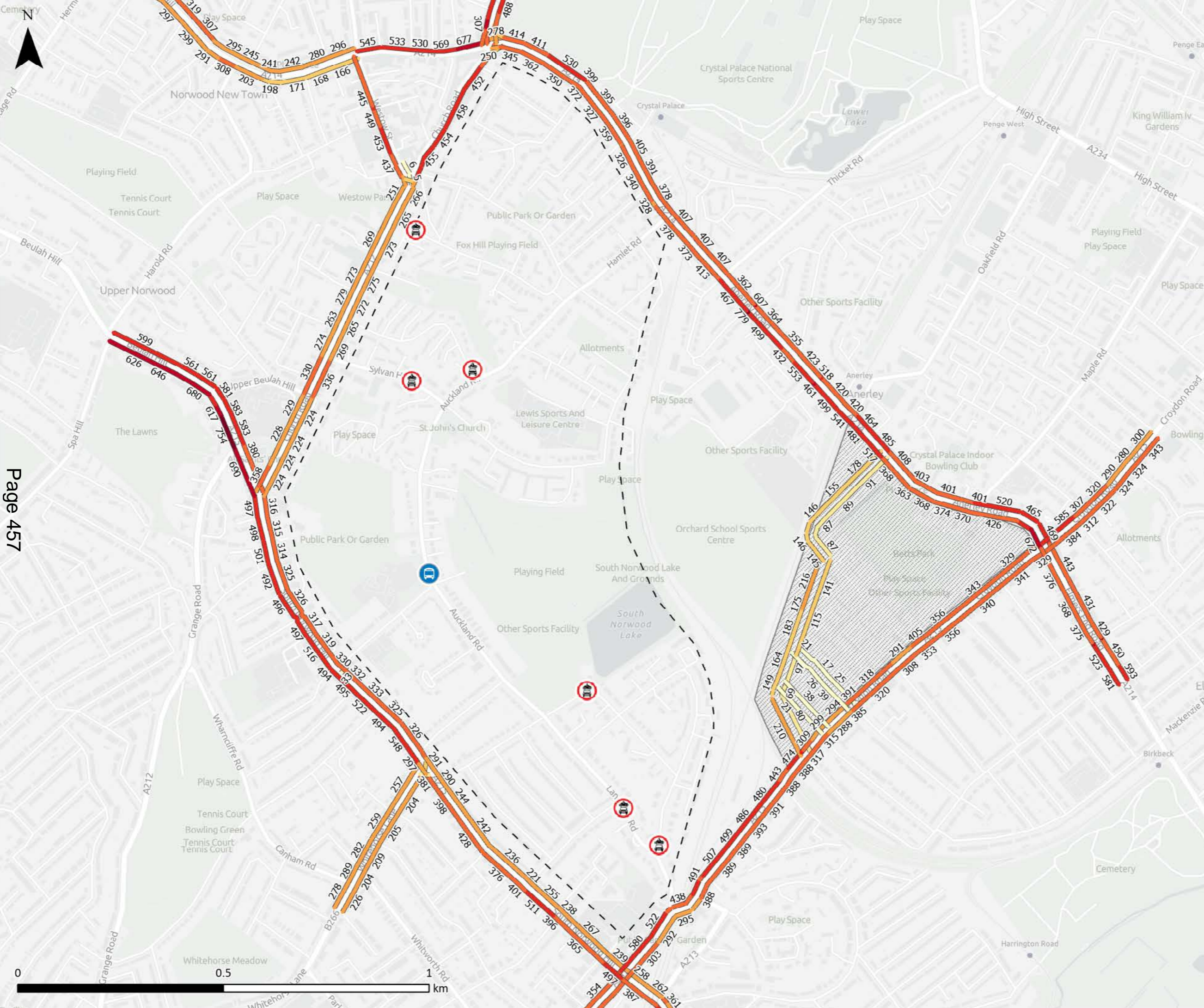
The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon
 PROJECT
Crystal Palace & South Norwood LTN
 TITLE

AVERAGE WEEKDAY DAILY TRAFFIC OUTSIDE LTN (BEFORE)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,500	JY	-	05/12/2020
FIGURE NUMBER	REVISION		
23			





--- Temporary Crystal Palace & South Norwood LTN

▨ Neighbourhood 2

LTN Measures

🚫 Modal Filter

🚌 Bus Gate

Average Weekday Daily Traffic (During)

Approx. no. of vehicle/ hour

- ≤50
- ≤100
- ≤200
- ≤300
- ≤450
- ≤600
- ≤700
- ≤800

'Daily' means 12-hour average taken between 7am-7pm
 Traffic data obtained from Floor
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

PJA  The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon

PROJECT
Crystal Palace & South Norwood LTN

TITLE
AVERAGE WEEKDAY DAILY TRAFFIC OUTSIDE LTN (DURING)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,500	JY	-	05/12/2020
FIGURE NUMBER	REVISION		
24	-		

CHANGE BEFORE AND DURING LTN (AVERAGE WEEKDAY AM PEAK)

As shown on the plan on the following page, the AM peak (7-10am) generally saw more increase in traffic amongst the selected roads than the daily average.

Two plans showing the flow estimates 'before' and 'during' the scheme are also presented on page 55-56. The change on each of the selected roads are summarised as follows.

Boundary roads

- Anerley Road saw a reduction of -92 to -132 vph (-18% to -29%) northbound, and a reduction between -105 and -145 vph (-25% to -35%) southbound.
- High Street-Penge Road saw a reduction between -63 and -370 vph (-8% to -43%) eastbound; and a change in traffic flows ranging from +134 to -147 vph (+69% to -29%) westbound.
- South Norwood Hill saw an increase between +33 and +88 vph (+5% to +21%) northbound; and a change in traffic flows ranging from -458 to +22 vph (-72% to +14%) southbound.
- Church Road (Westow Street-Beulah Hill) saw an increase between +97 and +129 vph (+37% to +39%) northbound, but a reduction

on southbound between -127 and -132 vph (-41% to -46%).

Crystal Palace Triangle

- Church Road (Anerley Hill-Westow Street), one-way southbound, saw a reduction of -57 vph (-11%).
- Westow Street, one-way northbound, saw an increase of +260 vph (+49%).
- Westow Hill, one-way eastbound, saw an increase of +114 vph (7%).

Neighbourhood 2

- Selby Road and Seymour Villas saw an increase between +95 and +106 vph (+76% to +87%) northbound; and a change ranging from 0 to -8 vph (0% to -25%) southbound.

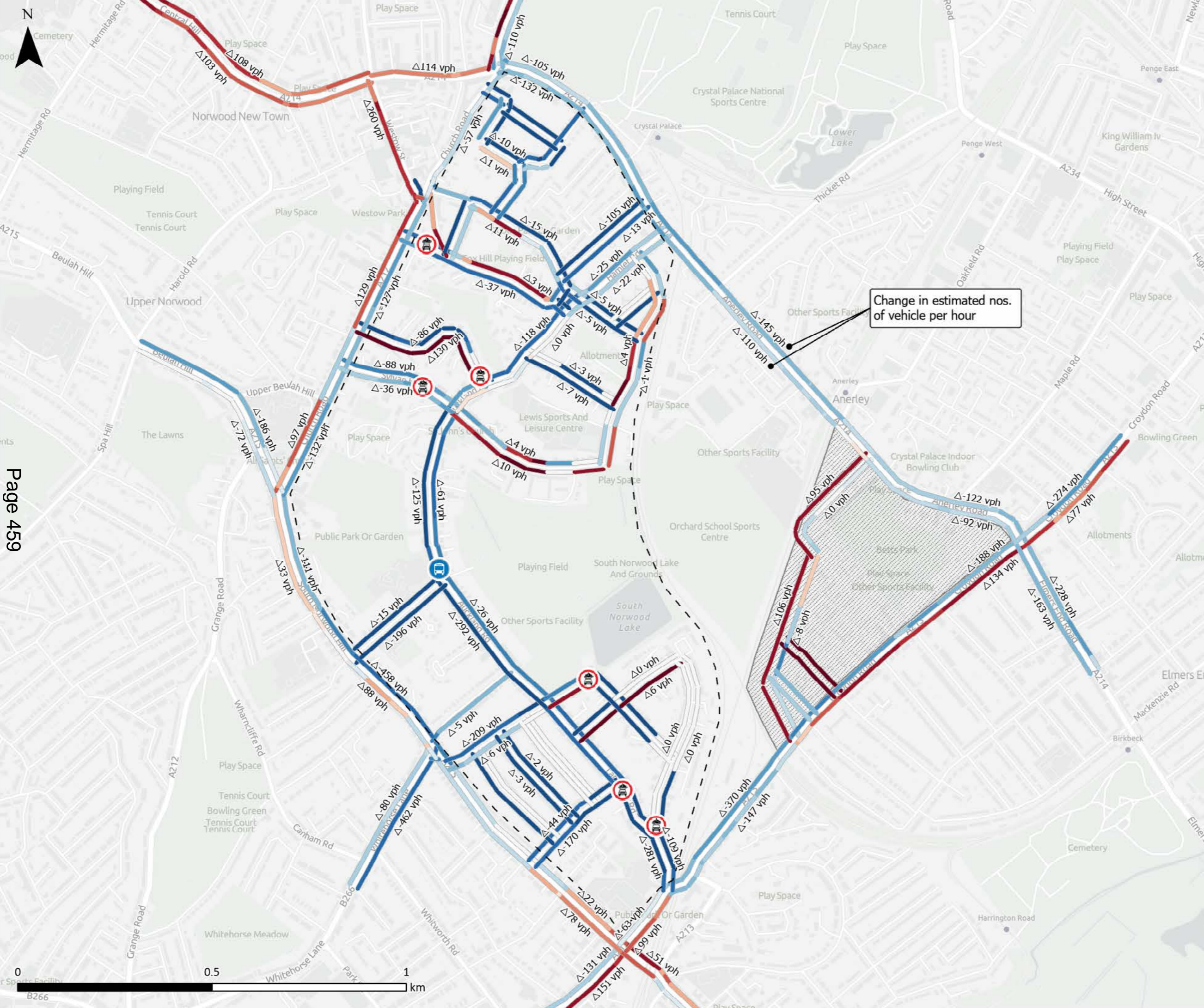
Summary

Apart from the locations seen in the daily average, traffic increase in the AM peak were also located along the northbound direction of South Norwood Hill, Church Road (Westow Street-Beulah Hill) and Westow Street. This shows an increased flow of traffic going northbound originated from the southern end of South Norwood Hill up to Crystal Palace Parade.

In addition, 'Neighbourhood 2' also saw an increase in traffic along the northbound

direction of Selby Road and Seymour Villas during the temporary LTN was introduced.

A more detailed discussion on the effects, using journey time difference data, is conducted in the Discussion section at the end of this chapter.



- Temporary Crystal Palace & South Norwood LTN
- ▨ Neighbourhood 2
- LTN Measures**
- 🚫 Modal Filter
- 🚌 Bus Gate
- % Change in Estimated Average Weekday AM Peak Traffic, Before and During LTN**
- -71-100%
- -56-70%
- -41-55%
- -31-40%
- -21-30%
- -11-20%
- -6-10%
- -1-5%
- 0%
- +1-5%
- +6-10%
- +11-20%
- +21-30%
- +31-40%
- +41-50%
- +51-100%
- >+100%

Change in estimated nos. of vehicle per hour

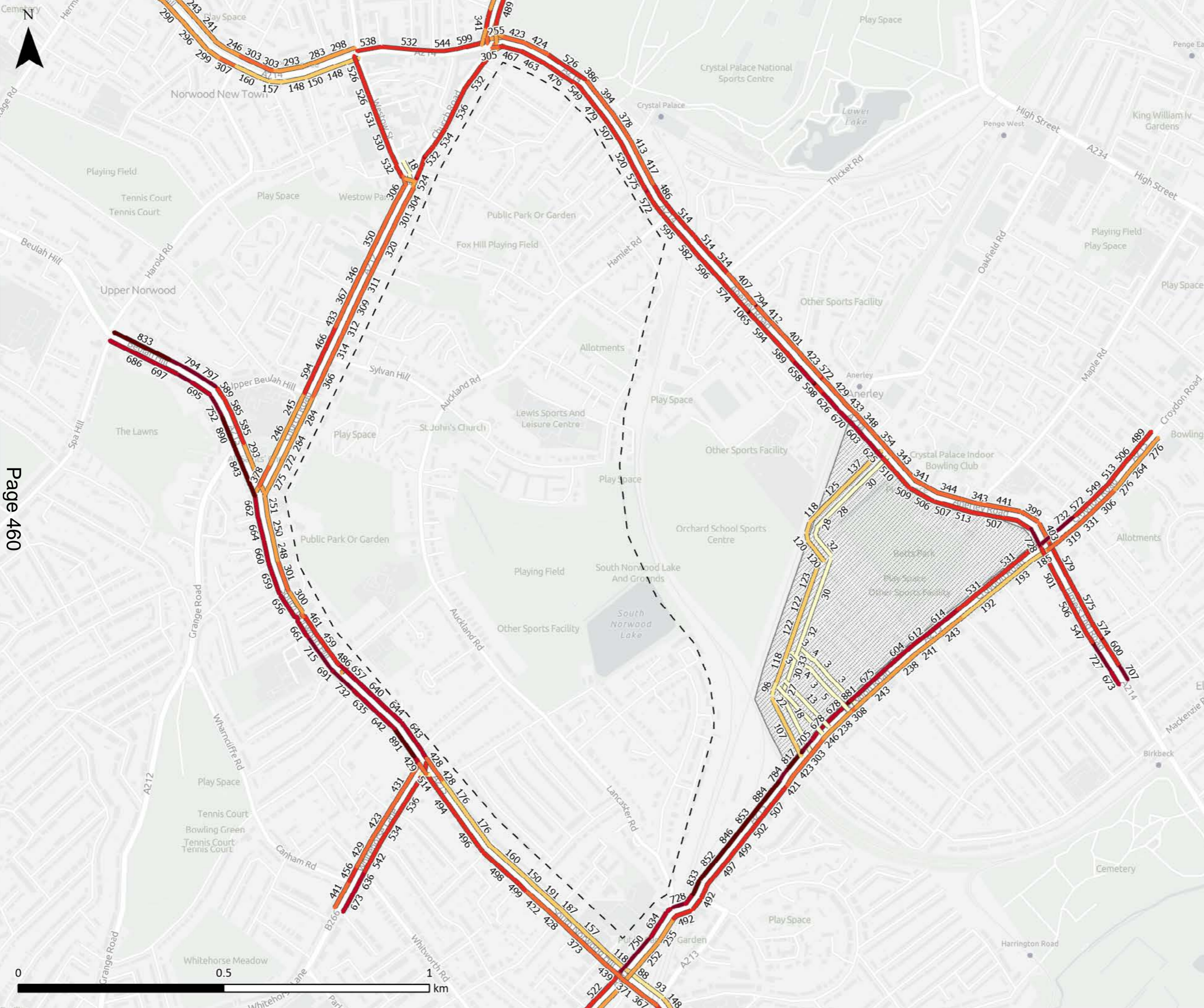
'AM peak' means 3-hour average taken between 7-10am
 Traffic data obtained from Flow
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

PJA  The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon
 PROJECT
Crystal Palace & South Norwood LTN
 TITLE

CHANGE IN ESTIMATED AVERAGE WEEKDAY AM PEAK TRAFFIC (BEFORE AND DURING LTN)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:9,000	JY	-	06/12/2020
FIGURE NUMBER	REVISION		
33			



--- Temporary Crystal Palace & South Norwood LTN

▨ Neighbourhood 2

Average Weekday AM Peak Traffic Outside LTN (Before)

Approx. no. of vehicle/ hour

- ≤ 50
- ≤ 100
- ≤ 200
- ≤ 300
- ≤ 450
- ≤ 600
- ≤ 700
- ≤ 800
- > 800

'AM peak' means 3-hour average taken between 7-10am
 Traffic data obtained from Floop
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

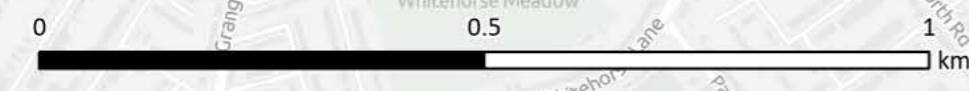
PJA  The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

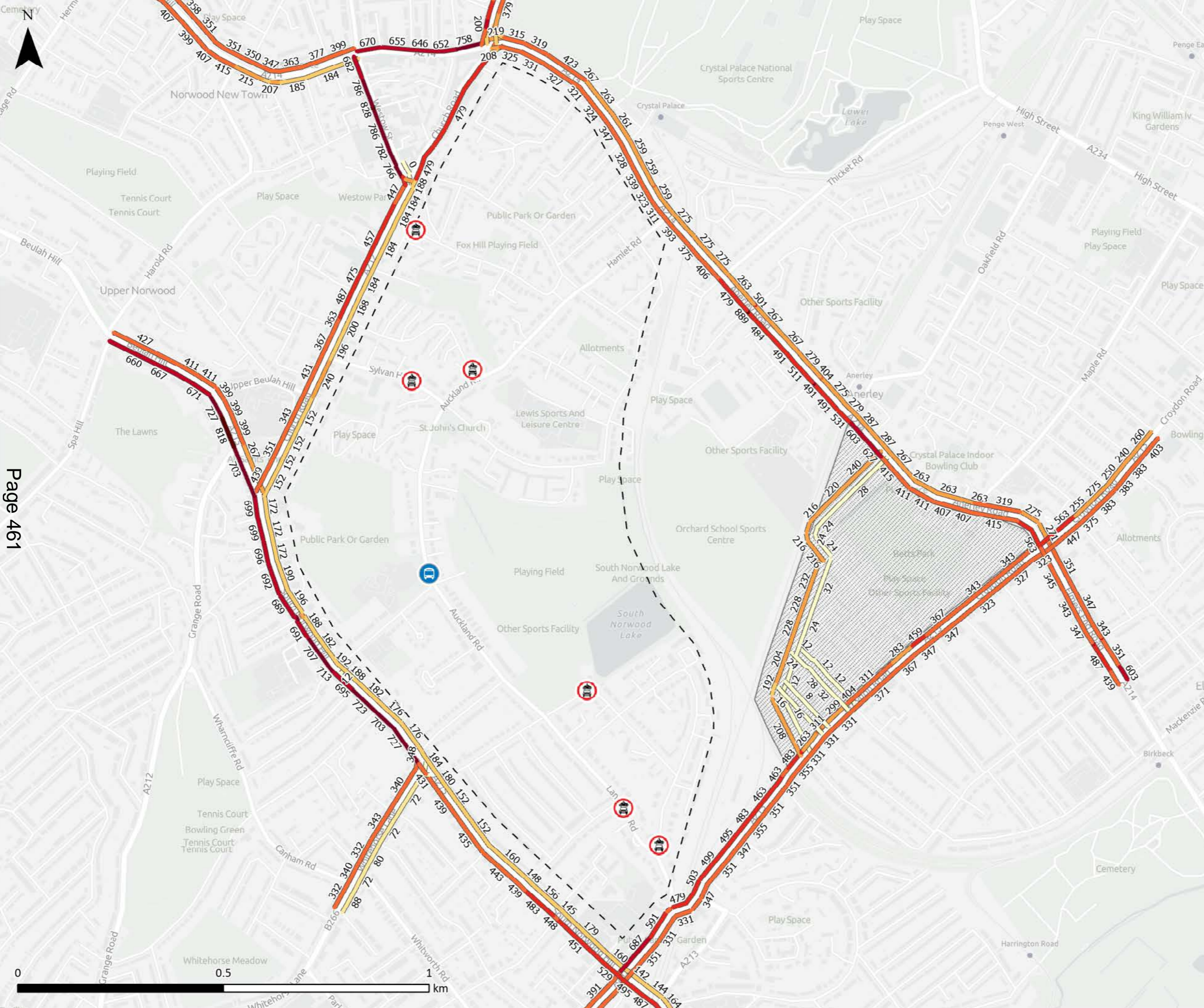
CLIENT
London Borough of Croydon

PROJECT
Crystal Palace & South Norwood LTN

AVERAGE WEEKDAY AM PEAK TRAFFIC OUTSIDE LTN (BEFORE)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,500	JY	-	05/12/2020
FIGURE NUMBER	REVISION		
25	-		





Temporary Crystal Palace & South Norwood LTN
 Neighbourhood 2
LTN Measures
 Modal Filter
 Bus Gate
Average Weekday AM Peak Traffic Outside LTN (During)
 Approx. no. of vehicle/ hour
 ≤50
 ≤100
 ≤200
 ≤300
 ≤450
 ≤600
 ≤700
 ≤800
 >800

'AM peak' means 3-hour average taken between 7-10am
 Traffic data obtained from Flow
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

PJA The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon
 PROJECT
Crystal Palace & South Norwood LTN
 TITLE

AVERAGE WEEKDAY AM PEAK TRAFFIC OUTSIDE LTN (DURING)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,500	JY	-	05/12/2020
FIGURE NUMBER	REVISION		
26			

CHANGE BEFORE AND DURING LTN (AVERAGE WEEKDAY PM PEAK)

The plan showing the change in traffic flow before and during the temporary LTN, for average weekday PM peak (4-7pm), is provided on the following page.

In comparison to the daily average and the AM peak, PM peak saw much more reduction than increase in traffic amongst the selected roads.

Two plans showing the flow estimates 'before' and 'during' the scheme are also presented on page 59-60.

The change on the selected roads are summarised as follows.

Boundary roads

- Anerley Road saw a reduction between -61 and -150 vph (-7% to -21%) northbound, and a change in traffic flows ranging from +151 to -213 vph (+20% to -29%) southbound. The increase was detected in proximity to the junction with Croydon Road.
- High Street-Penge Road saw a change in traffic flows ranging from +18 to -104 vph (+3% to -14%) eastbound; and a reduction between -98 and -278 vph (-19% to -31%) westbound.

- South Norwood Hill saw a change in traffic flows ranging from +18 to -140 vph (+4% to -20%) northbound; and between +7 and -321 vph (+2% to -35%) southbound.
- Church Road (Westow Street-Beulah Hill) saw a reduction between -166 and -268 vph (-49% to -62%) northbound, and a reduction of -147 to -190 vph (-26% to -38%) southbound.

Crystal Palace Triangle

- Church Road (Anerley Hill-Westow Street), one-way southbound, saw a reduction of -174 vph (-23%).
- Westow Street, one-way northbound, saw a reduction of -258 vph (-45%).
- Westow Hill, one-way eastbound, saw a reduction of -135 vph (-23%).

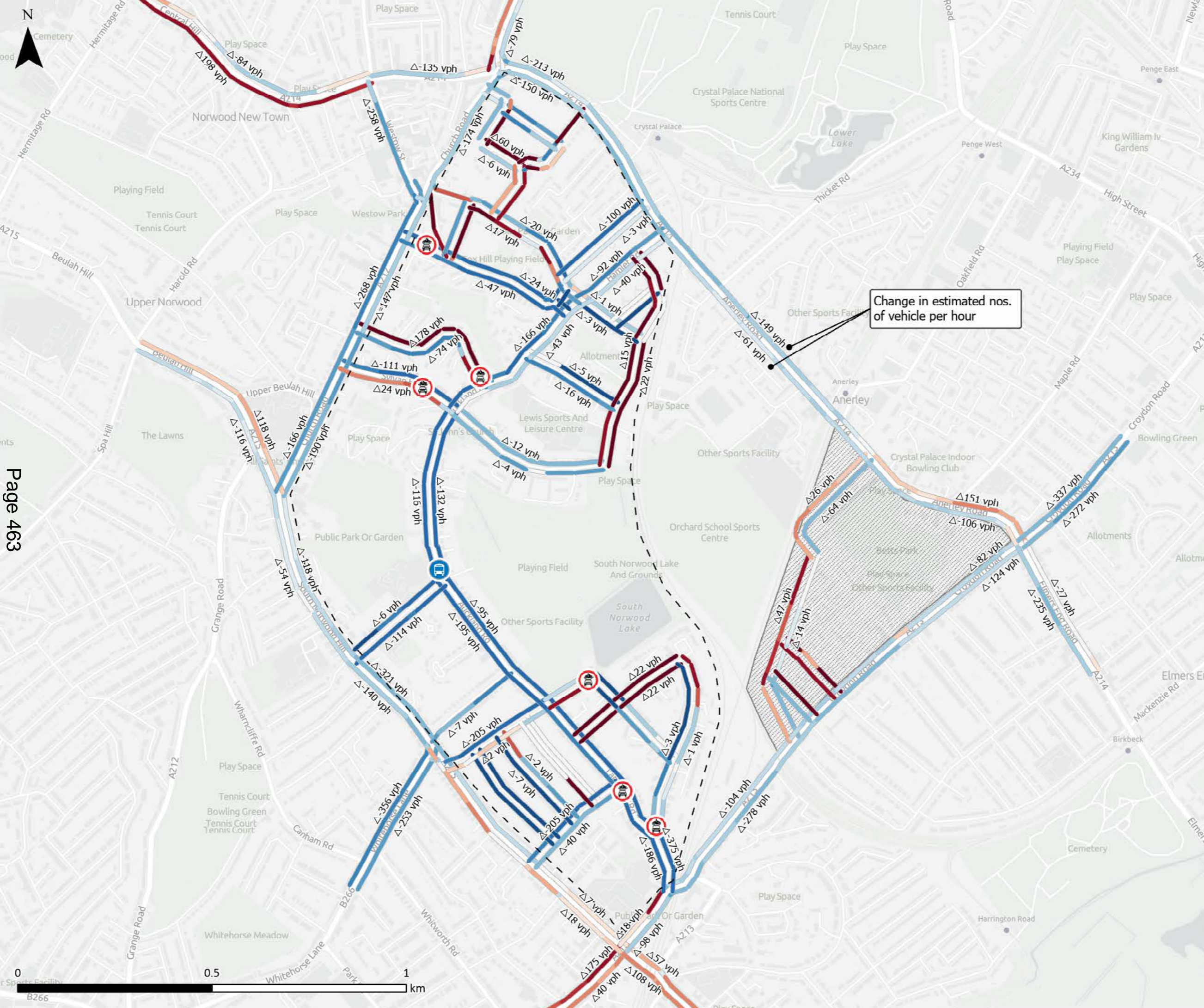
Neighbourhood 2

- Selby Road and Seymour Villas saw an increase between +26 and +47 vph (+16% to +32%) northbound; but a reduction between of -14 to -64 vph (-8% to -35%) southbound.

Summary

For the PM peak, while traffic mostly decreased on the roads nearby, Selby Road and Seymour Villas of 'Neighbourhood 2' still saw an increase in the northbound direction during the temporary LTN was introduced.

A more detailed discussion on the effects, using journey time difference data, is conducted in the Discussion section at the end of this chapter.



- Temporary Crystal Palace & South Norwood LTN
- Neighbourhood 2
- LTN Measures**
- Modal Filter
- Bus Gate
- % Change in Estimated Average Weekday PM Peak Traffic, Before and During LTN**
- 71-100%
- 56-70%
- 41-55%
- 31-40%
- 21-30%
- 11-20%
- 6-10%
- 1-5%
- 0%
- +1-5%
- +6-10%
- +11-20%
- +21-30%
- +31-40%
- +41-50%
- +51-100%
- >+100%

'PM peak' means 3-hour average taken between 4-7pm
 Traffic data obtained from Flow
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

PJA

The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

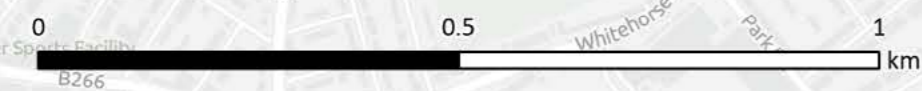
CLIENT
London Borough of Croydon

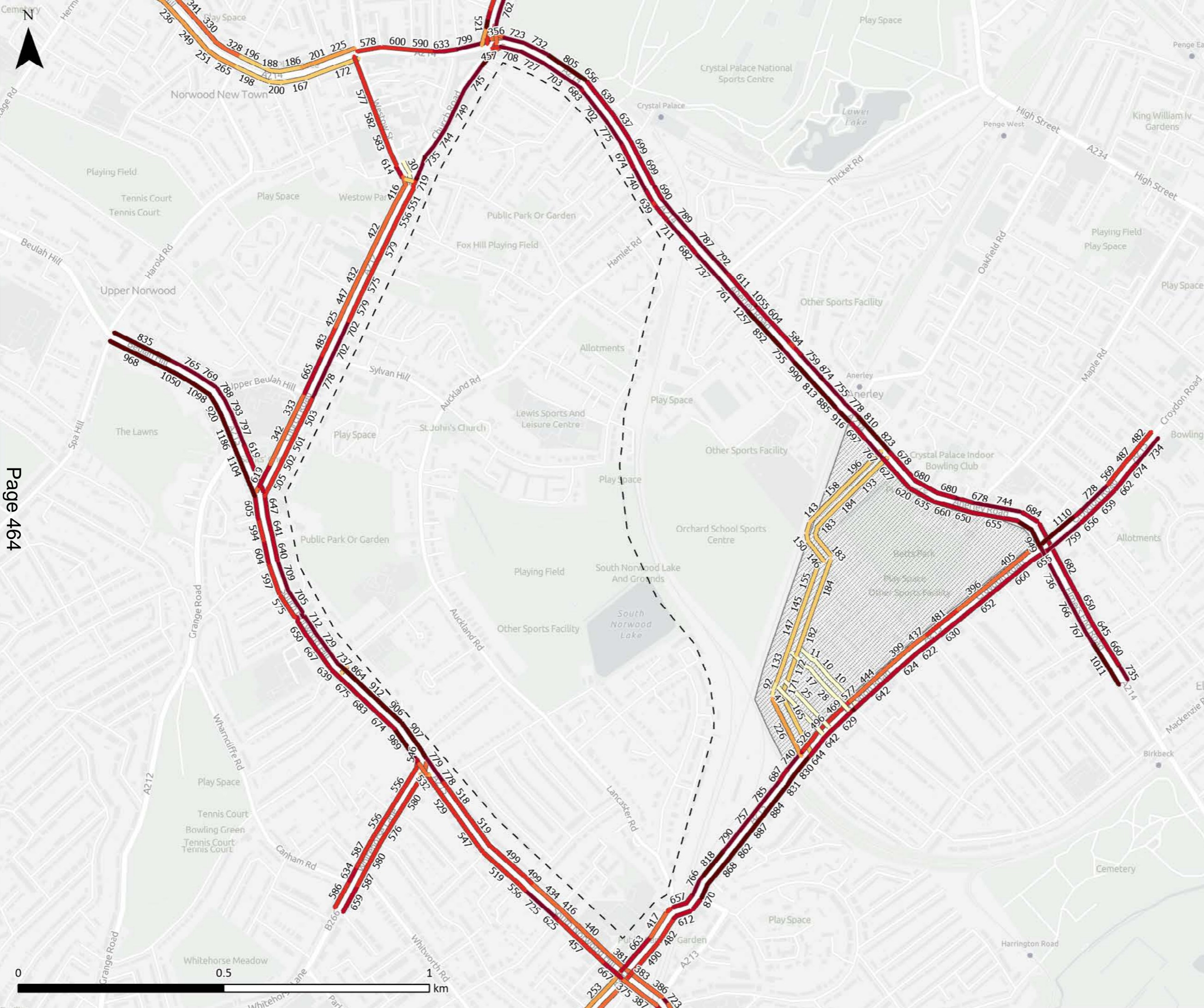
PROJECT
Crystal Palace & South Norwood LTN

TITLE

CHANGE IN ESTIMATED AVERAGE WEEKDAY PM PEAK TRAFFIC (BEFORE AND DURING LTN)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:9,000	JY	-	06/12/2020
FIGURE NUMBER	REVISION		
34			





--- Temporary Crystal Palace & South Norwood LTN

▨ Neighbourhood 2

Average Weekday PM Peak Traffic Outside LTN (Before)

Approx. no. of vehicle/ hour

- ≤50
- ≤100
- ≤200
- ≤300
- ≤450
- ≤600
- ≤700
- ≤800
- >800

'PM peak' means 3-hour average taken between 4-7pm
 Traffic data obtained from Flow
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

PJA  The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT

London Borough of Croydon

PROJECT

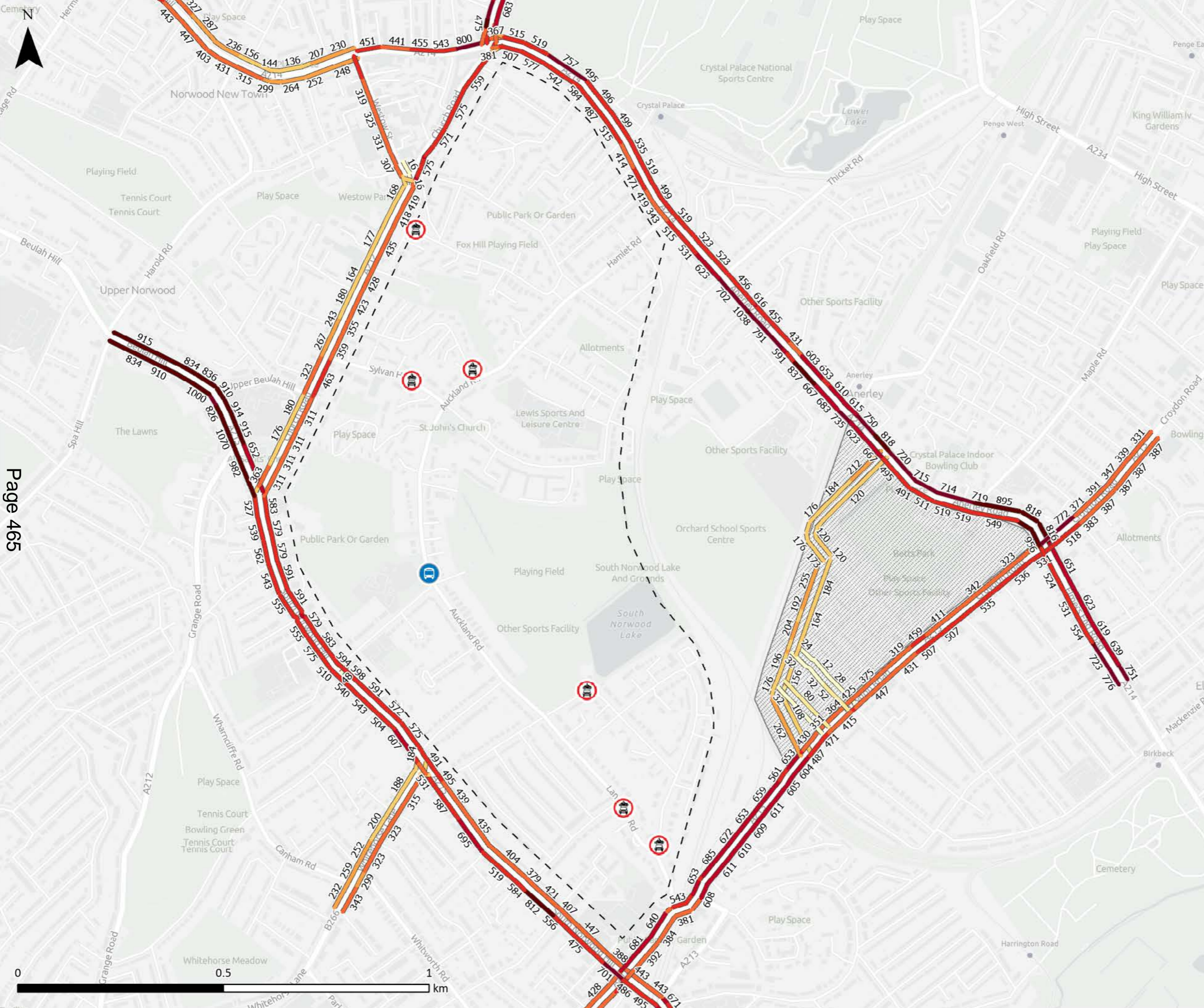
Crystal Palace & South Norwood LTN

TITLE

AVERAGE WEEKDAY PM PEAK TRAFFIC OUTSIDE LTN (BEFORE)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,500	JY	-	05/12/2020
FIGURE NUMBER	REVISION		
27	-		





Temporary Crystal Palace & South Norwood LTN
 Neighbourhood 2
LTN Measures
🚫 Modal Filter
🚌 Bus Gate
Average Weekday PM Peak Traffic Outside LTN (During)
 Approx. no. of vehicle/ hour
 ≤50
 ≤100
 ≤200
 ≤300
 ≤450
 ≤600
 ≤700
 ≤800
 >800

*PM peak' means 3-hour average taken between 4-7pm
 Traffic data obtained from Flow
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

PJA

The Aquarium
King Street
Reading
RG1 2AN
T. 0118 956 0909

CLIENT

London Borough of Croydon

PROJECT

Crystal Palace & South Norwood LTN

TITLE

AVERAGE WEEKDAY PM PEAK TRAFFIC OUTSIDE LTN (DURING)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:8,500	JY	-	05/12/2020
FIGURE NUMBER		REVISION	
28		-	



Church Road section between Anerley Hill and Westow Street, taken during AM peak



The original exit arm on Belvedere Road, now converted to an outdoor dining space



Portland Road facing northbound



Church Road section between Anerley Hill and Westow Street, taken during PM peak



Church Road junction with Westow Street, taken during PM peak



Anerley Hill junction with Cintra Park

3.3 JOURNEY TIME DIFFERENCE (GENERAL TRAFFIC)

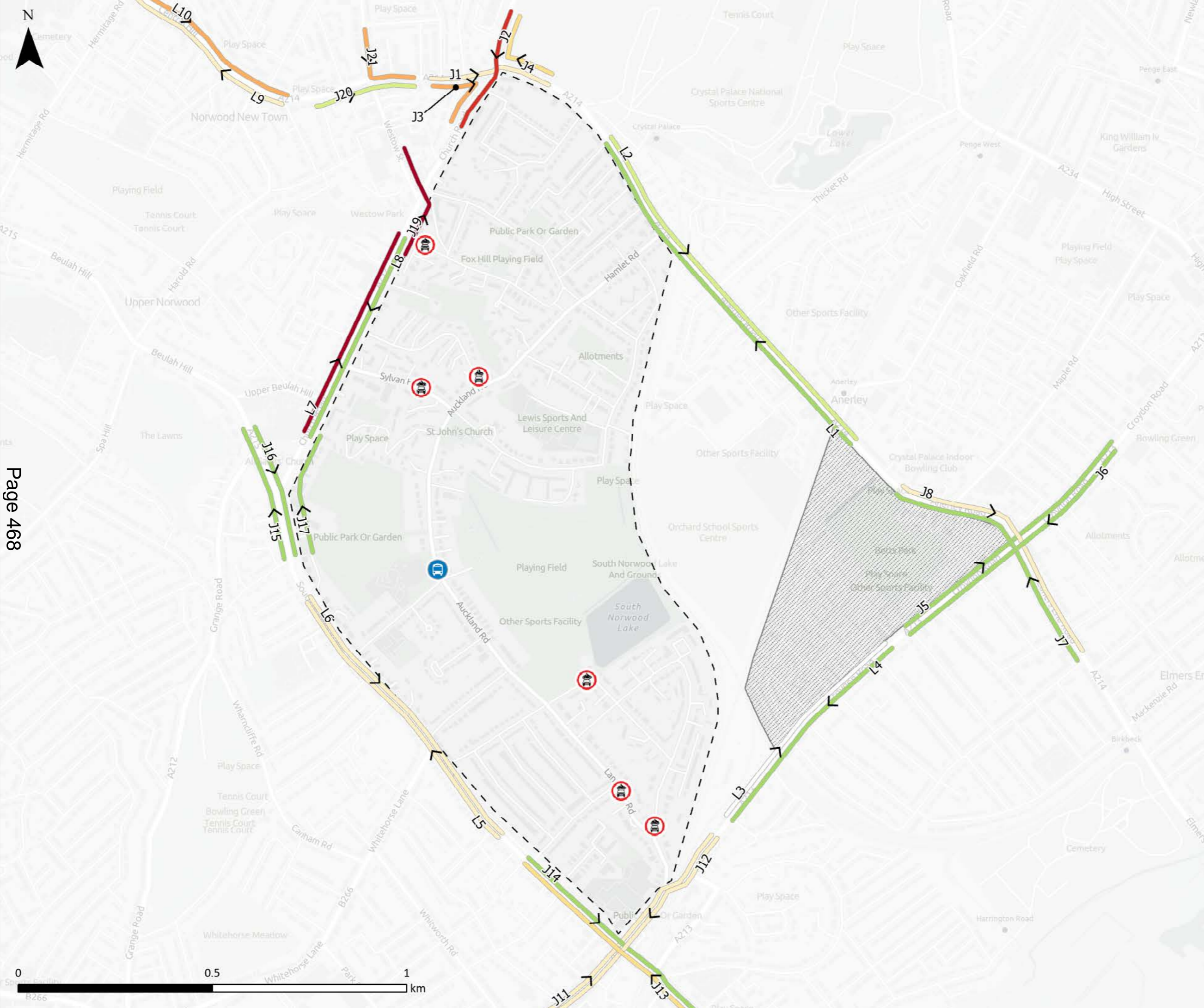
This section presents the before-and-during journey time comparison for general traffic, on roads and junctions in vicinity to the temporary LTN. Similarly to the previous sections, the data was provided for The Floop using telematics technology. The data is presented by peak periods. We have calculated the journey time difference using median journey time in seconds.

GENERAL TRAFFIC (AM PEAK)

A total of 31 routes was monitored, though three of the routes did not have enough data to generate robust results for the AM peak (7-10am). Results for the remaining 28 routes are shown in the table laid out on the right, with their location shown on the plan overleaf.


Roughly half of the routes have recorded a reduction or less than 1% increase in median journey time. Most routes (13 in total) with more than 1% increase are along Church Road northbound and the Crystal Palace Triangle. The median journey time increase ranges from 1 second to around 1.9 minutes.

Route Label	Median AM Peak journey time, Before LTN	Median AM Peak journey time, During LTN	Journey time range for 80% of journeys in AM Peak, During LTN	Difference in median journey time in AM Peak	% Change in median journey time in AM Peak
J1	101 s	102 s	64s - 139s	+1 s	+1.0%
J2	58 s	100.5 s	50s - 189s	+42.5 s	+73.3%
J3	123 s	143 s	83s - 313s	+20 s	+16.3%
J4	128 s	137.5 s	84s - 211s	+9.5 s	+7.4%
J5	127 s	110 s	86s - 180s	-17 s	-13.4%
J6	91 s	86 s	73s - 117s	-5 s	-5.5%
J7	154 s	146 s	79s - 243s	-8 s	-5.2%
J8	82 s	83 s	66s - 116s	+1 s	+1.2%
J11	172 s	176 s	113s - 286s	+4 s	+2.3%
J12	145 s	146 s	100s - 212s	+1 s	+0.7%
J13	170 s	185 s	100s - 329s	+15 s	+8.8%
J14	131 s	121 s	91s - 241s	-10 s	-7.6%
J15	71 s	61.5 s	39s - 96s	-9.5 s	-13.4%
J16	55 s	49 s	36s - 67s	-6 s	-10.9%
J17	69 s	62 s	42s - 91s	-7 s	-10.1%
J19	91.5 s	208 s	79s - 267s	+116.5 s	+127.3%
J20	87 s	86 s	45s - 169s	-1 s	-1.1%
J21	41 s	48.5 s	39s - 83s	+7.5 s	+18.3%
L1	145 s	131.5 s	99s - 319s	-13.5 s	-9.3%
L2	129 s	123 s	98s - 175s	-6 s	-4.7%
L3	71 s	71 s	54s - 104s	0 s	0.0%
L4	78 s	72 s	57s - 119s	-6 s	-7.7%
L5	138 s	141 s	104s - 233s	+3 s	+2.2%
L6	96 s	96.5 s	77s - 120s	+0.5 s	+0.5%
L7	71.5 s	146 s	61s - 293s	+74.5 s	+104.2%
L8	64.5 s	60 s	49s - 76s	-4.5 s	-7.0%
L9	47 s	48 s	41s - 73s	+1 s	+2.1%
L10	140 s	157 s	131s - 216s	+17 s	+12.1%



- Temporary Crystal Palace & South Norwood LTN
- Neighbourhood 2
- LTN Measures**
- Modal Filter
- Bus Gate
- % Change in AM Peak median journey time**
- 10-14 %
- 5-9 %
- 1-4 %
- ≤0
- +1-5%
- +6-10%
- +11-25%
- +26-50%
- +51-100%
- +101-130%

'AM peak' means 3-hour average taken between 7-10am
 Traffic data obtained from FLOW
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack



PJA

The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT

London Borough of Croydon

PROJECT

Crystal Palace & South Norwood LTN

TITLE

JOURNEY TIME DIFFERENCE (AM PEAK) (BEFORE AND DURING LTN)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:9,000	JY	-	09/12/2020
FIGURE NUMBER	REVISION		
21	-		

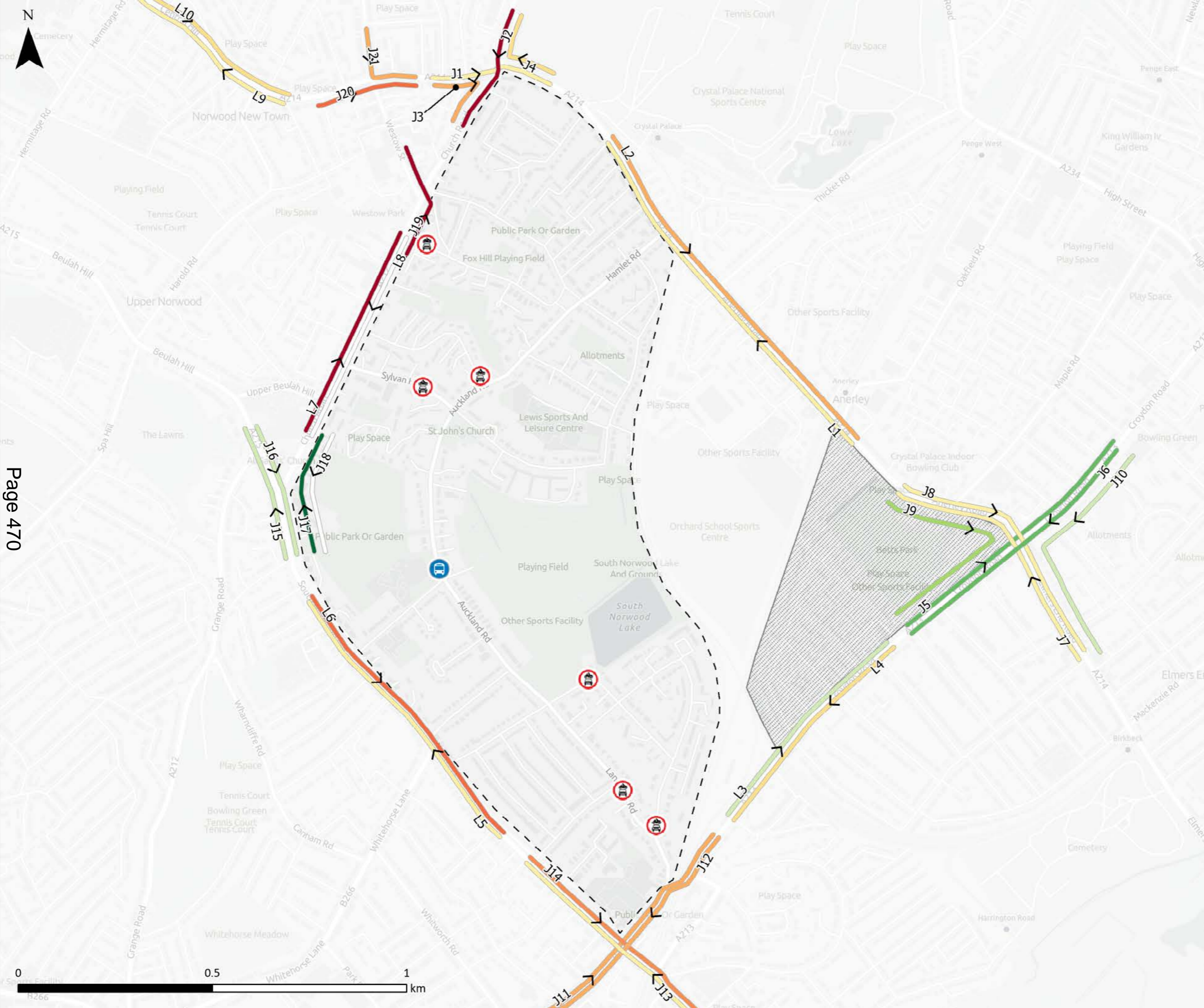
GENERAL TRAFFIC (PM PEAK)

A total of 31 routes was monitored, with results presented for the PM peak. The table of results are laid out on the right, with their location shown on the plan overleaf.

About two-third of the routes have recorded more than 1% increase in median journey time. The increase ranges from 4 seconds to 2.6 minutes. These routes cover most road segments around the temporary LTN. Similar to the AM peak, Church Road northbound and the Crystal Palace Triangle are amongst the area with most percentage increase in median journey time. South Norwood Hill southbound, down to Portland Road, also saw a large increase in the PM peak.

A more detailed analysis about the journey time difference is included in the Discussion section at the end of this chapter.

Route Label	Median PM Peak journey time, Before LTN	Median PM Peak journey time, During LTN	Journey time range for 80% of journeys in PM Peak, During LTN	Difference in median journey time in PM Peak	% Change in median journey time in PM Peak
J1	159.5 s	168 s	93s - 274s	+8.5 s	+5.3%
J2	68 s	192 s	89s - 286s	+124 s	+182.3%
J3	193 s	266 s	178s - 370s	+73 s	+37.8%
J4	123 s	143 s	69s - 237s	+20 s	+16.3%
J5	142 s	127 s	80s - 196s	-15 s	-10.6%
J6	112 s	98 s	75s - 140s	-14 s	-12.5%
J7	126 s	137 s	89s - 216s	+11 s	+8.7%
J8	97 s	106 s	74s - 162s	+9 s	+9.3%
J9	98 s	92 s	75s - 157s	-6 s	-6.1%
J10	106.5 s	105 s	83s - 130s	-1.5 s	-1.4%
J11	255 s	328.5 s	182s - 477s	+73.5 s	+28.8%
J12	147.5 s	221 s	148s - 289s	+73.5 s	+49.8%
J13	173 s	180 s	116s - 297s	+7 s	+4.0%
J14	274 s	426 s	247s - 621s	+152 s	+55.5%
J15	67.5 s	64.5 s	41s - 108s	-3 s	-4.4%
J16	68 s	65 s	51s - 86s	-3 s	-4.4%
J17	69 s	56.5 s	37s - 88s	-12.5 s	-18.1%
J18	49 s	49 s	40s - 73s	0 s	+0.0%
J19	82 s	243 s	116s - 320s	+161 s	+196.3%
J20	108 s	192.5 s	67s - 377s	+84.5 s	+78.2%
J21	71 s	97 s	48s - 153s	+26 s	+36.6%
L1	146 s	159 s	113s - 225s	+13 s	+8.9%
L2	174 s	238 s	146s - 387s	+64 s	+36.8%
L3	80 s	79 s	57s - 117s	-1 s	-1.3%
L4	75 s	89 s	61s - 225s	+14 s	+18.7%
L5	121.5 s	126 s	99s - 243s	+4.5 s	+3.7%
L6	112 s	252 s	126s - 426s	+140 s	+125.0%
L7	72 s	219 s	92s - 424s	+147 s	+204.2%
L8	65 s	65 s	53s - 91s	0 s	0.0%
L9	49 s	53 s	48s - 75s	+4 s	+8.2%
L10	153 s	181 s	144s - 276s	+28 s	+18.3%



- Temporary Crystal Palace & South Norwood LTN
- Neighbourhood 2
- LTN Measures**
- Modal Filter
- Bus Gate
- % Change in PM Peak median journey time**
- 15-20 %
- 10-14 %
- 5-9 %
- 1-4 %
- 0 %
- +1-10 %
- +11-25 %
- +26-50 %
- +51-75 %
- +76-100 %
- +101-125 %
- +126-150 %
- +151-210 %

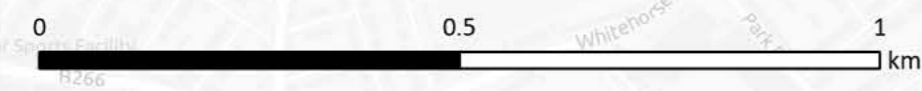
'PM peak' means 3-hour average taken between 4-7pm
 Traffic data obtained from Flow
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

PJA The Aquarium
 King Street
 Reading
 RG1 2AN
 T. 0118 956 0909

CLIENT
London Borough of Croydon
 PROJECT
Crystal Palace & South Norwood LTN
 TITLE

JOURNEY TIME DIFFERENCE (PM PEAK) (BEFORE AND DURING LTN)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:9,000	JY	-	09/12/2020
FIGURE NUMBER	REVISION		
22	-		



3.4 JOURNEY TIME DIFFERENCE (BUSES)

Bus journey time data, as provided by TfL from the iBus system, has been analysed to understand if the temporary LTN scheme has had an effect in the running times of local bus routes. The latest data we obtained cover the period from January 2019 to the second week of October 2020.

The timeline graph, showing changes in average weekday bus journey time during a 12-hour peak (7am-7pm), are presented by each road corridor around the LTN. These corridors are listed below.

- Anerley Road (northbound)
- Anerley Road (southbound)
- Penge Road (eastbound)
- Penge Road (westbound)
- South Norwood Hill (northbound)
- South Norwood Hill (southbound)
- Church Road (northbound)
- Church Road (southbound)

On top of each graph, we also added the timeline of road works, LTN measures and COVID-19 restrictions at the time along the bus performance timeline. For the precise location and details of particular LTN measure or road works, please refer to page 34-35.

ANERLEY ROAD (NORTHBOUND)

The average journey time of buses along Anerley Road northbound dropped with the first lockdown in late March 2020, then remained below the baseline of 3.2 minutes per kilometre (min/km).

The figure started increase, to about 4.2 min/km starting from August 2020. It then increased to about 4.9 min/km in October.

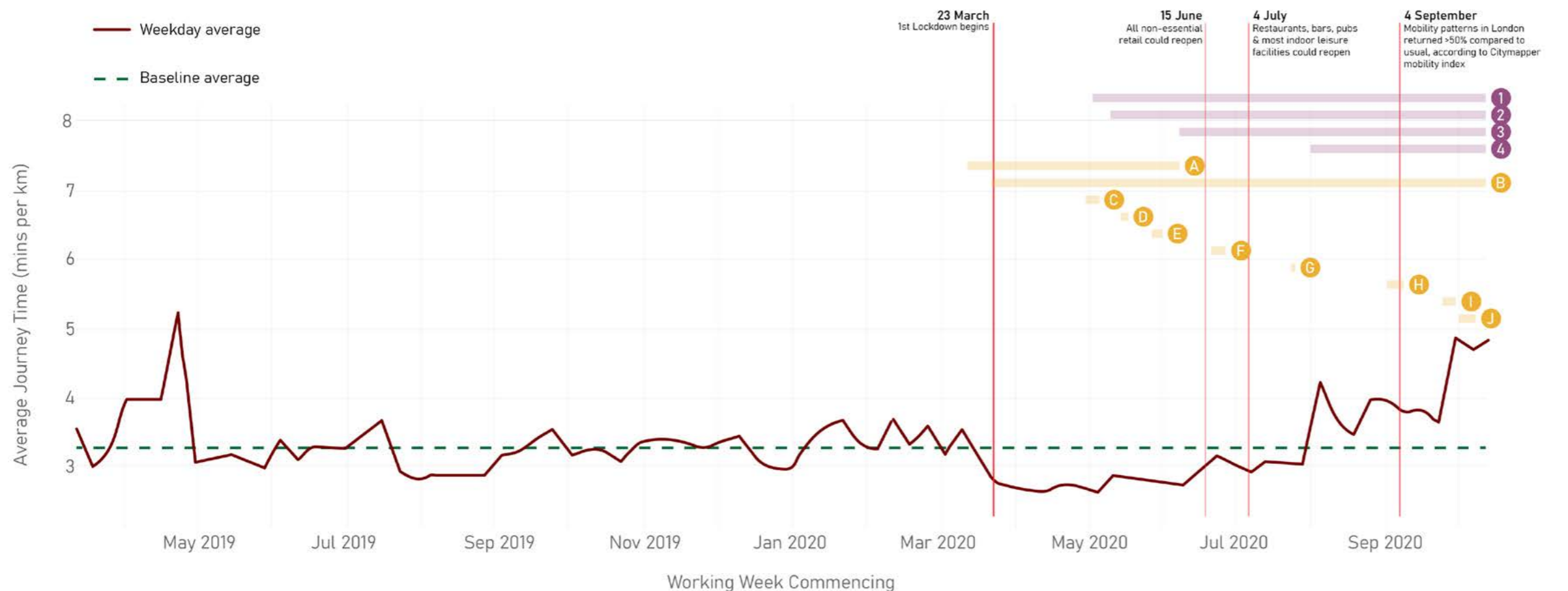
The first spike in journey time coincided with the period when the modal filters were installed on Stambourne Way, Sylvan Hill and Fox Hill. Despite the figure fell to around 3.8 min/km in late September, the figure reached 4.9 min/km again when the road works were in place on Auckland Road.

ANERLEY ROAD (SOUTHBOUND)

The average journey time of buses along Anerley Road southbound also stayed below the baseline of 3.3 minutes per kilometre (min/km) after dropping with the first lockdown in late March 2020.

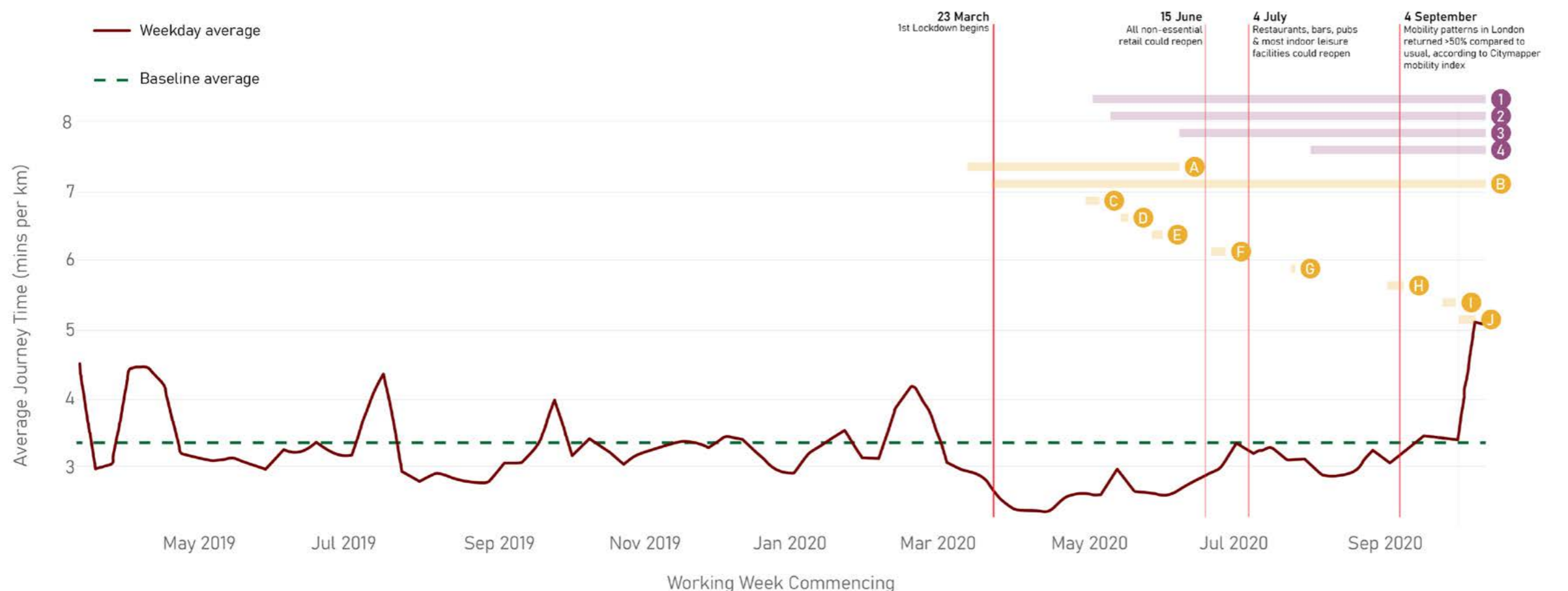
The figure did not increase over the baseline until early October, when it soared to about 5.1 min/km.

Anerley Road NB corridor



Source: Transport for London

Anerley Road SB corridor



Source: Transport for London

Temporary LTN Measures

- 1 **9 May 2020**
Modal filter at
- Junction of Lancaster Road/ Southern Avenue
- Junction of Woodvale Avenue/ Avenue Road
- 2 **9 May 2020**
Modal filter at Junction of Lancaster Road/ Warminster Road
- 3 **7 June 2020**
Modal filter (now a Bus Gate) at Auckland Road by Cypress Road
- 4 **3 August 2020**
Modal filter on
- Stambourne Way
- Sylvan Hill
- Fox Hill

Road works

- A Auckland Road
- B Church Road
- C Westow Hill
- D Church Road
- E Sylvan Road
- F Westow Hill
- G Woodvale Avenue
- H South Norwood Hill
- I Auckland Road
- J Auckland Road

PENGE ROAD (EASTBOUND)

The baseline average of bus journey time along Penge Road eastbound is around 3.6 min/km. The figure stayed below the baseline after the lockdown measures were enforced since late March 2020.

Some fluctuations were identified, such as a spike after non-essential retail were allowed to reopen on 15 July, as well as at the start of a roadwork on South Norwood Hill. Nevertheless, the figure stayed at around 3.5 min/km at the end of the data period.

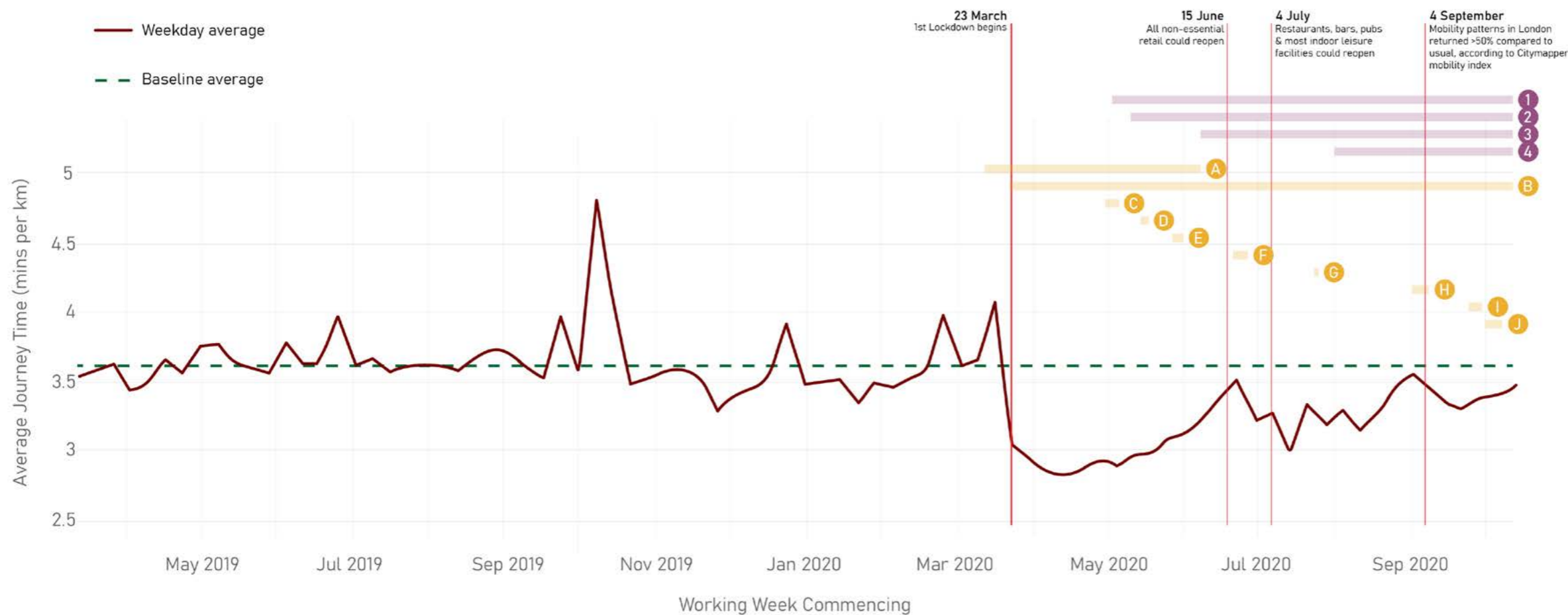
PENGE ROAD (WESTBOUND)

The baseline average of bus journey time along Penge Road westbound is around 4.6 min/km. The average decreased to around 3.5 min/km after the first lockdown.

The figure started increase above the baseline average starting from mid-July, after the restaurants were allowed to reopen. It then increased to around 6 min/km in September. That was the time when the mobility patterns in London returned to at least 50% of the usual, according to Citymapper mobility index.¹

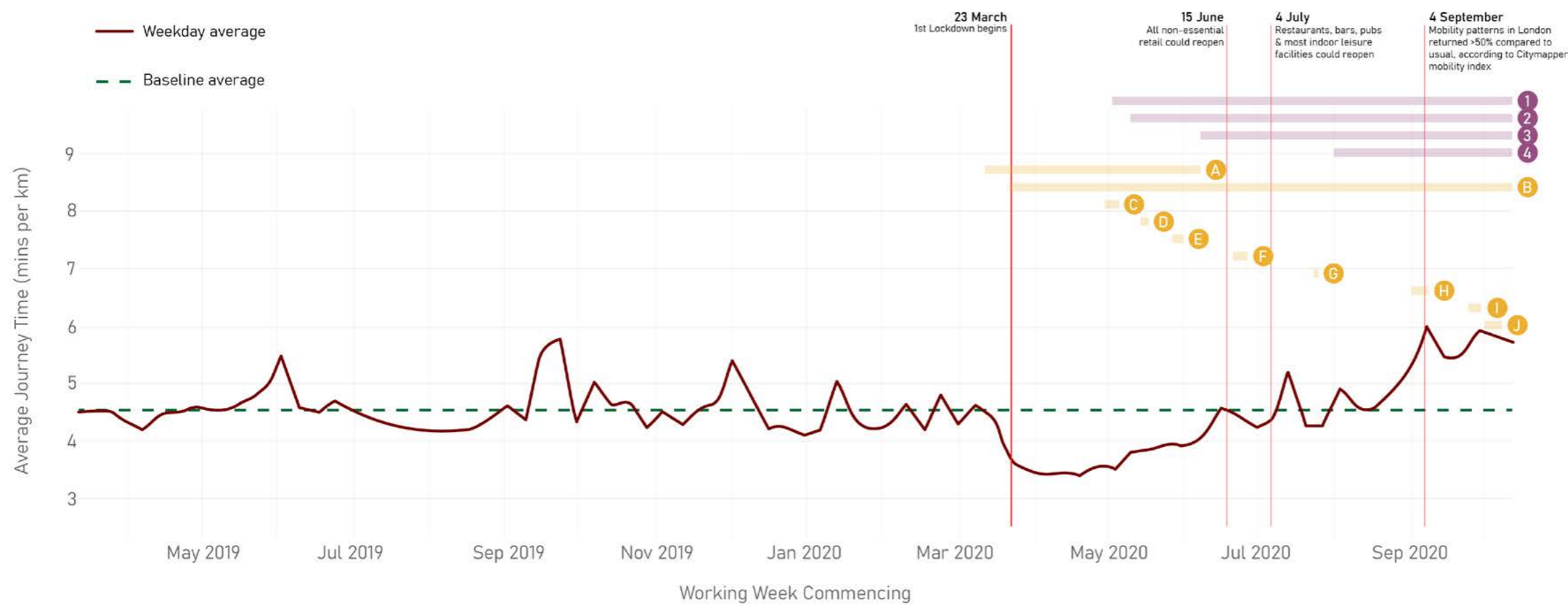
1 - [Citymapper Mobility Index \(2020\) '% of London moving compared to usual'](#)

Penge Road EB corridor



Source: Transport for London

Penge Road WB corridor



Source: Transport for London

Temporary LTN Measures

- 1 9 May 2020
Modal filter at
- Junction of Lancaster Road/ Southern Avenue
- Junction of Woodvale Avenue/ Avenue Road
- 2 9 May 2020
Modal filter at Junction of Lancaster Road/ Warminster Road
- 3 7 June 2020
Modal filter (now a Bus Gate) at Auckland Road by Cypress Road
- 4 3 August 2020
Modal filter on
- Stambourne Way
- Sylvan Hill
- Fox Hill

Road works

- A Auckland Road
- B Church Road
- C Westow Hill
- D Church Road
- E Sylvan Road
- F Westow Hill
- G Woodvale Avenue
- H South Norwood Hill
- I Auckland Road
- J Auckland Road

SOUTH NORWOOD HILL (NORTHBOUND)

The baseline average of bus journey time along South Norwood Hill northbound is around 3.8 min/km. After lockdown in March 2020, the average bus journey time reduced to less than 3 min/km.

While the figure gradually increased over a six month period, it stayed below the baseline average, before it soared to over 5 min/ km in early October.

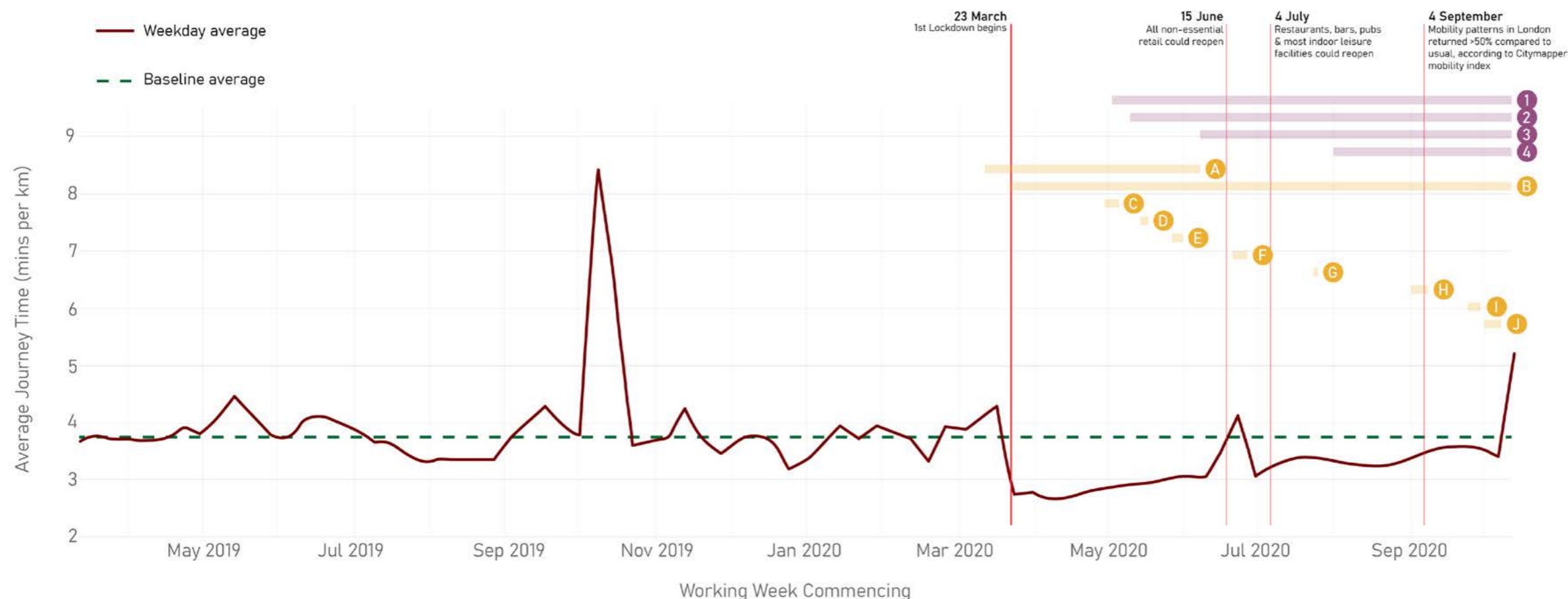
SOUTH NORWOOD HILL (SOUTHBOUND)

The baseline average of bus journey time along South Norwood Hill southbound is around 4 min/km. After lockdown, the average reduced to less than 3 min/km, then increased above the baseline after non-essential retailers were back in business since mid-June 2020.

The figure fluctuated for a few months before October, which at times it soared to near 6 min/km. This spike happened around the period when the modal filters were installed on Stambourne Way, Sylvan Hill and Fox Hill.

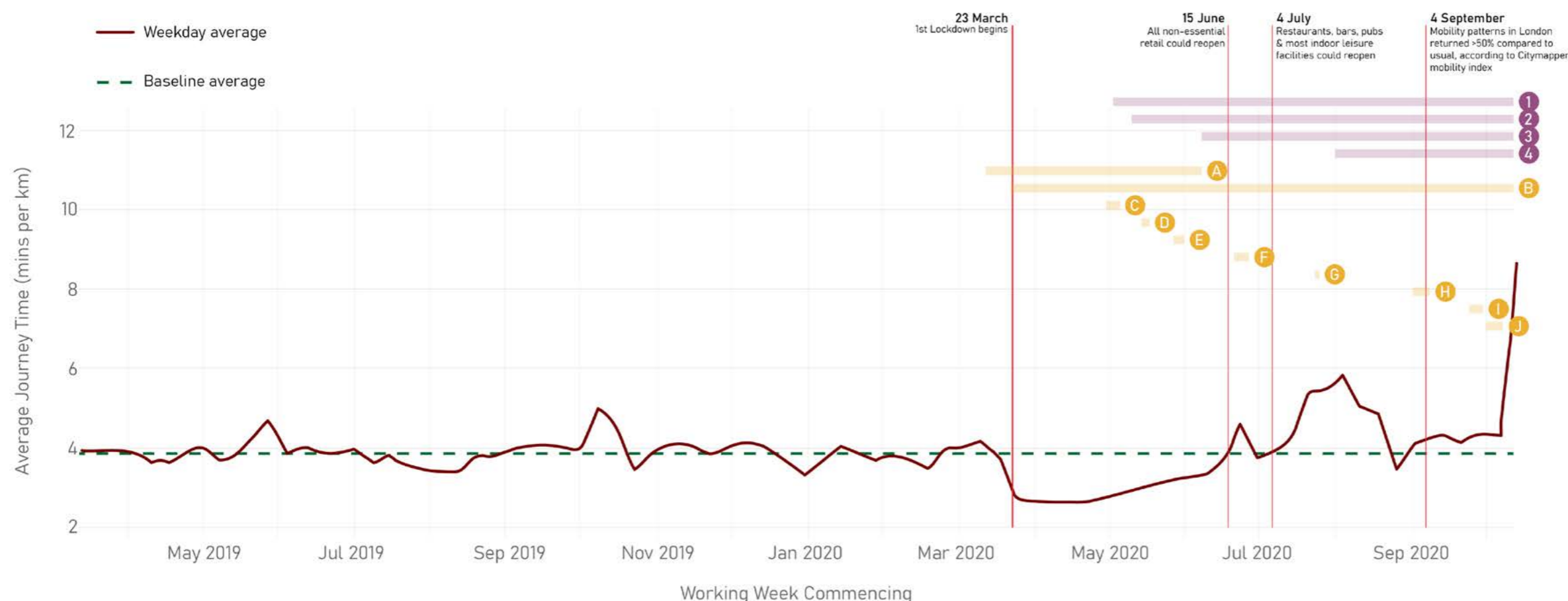
The figure fell back to just above the baseline (around 4.2 min/km) around September and remain steady until early October, when soared to over 8 min/ km.

South Norwood Hill NB corridor



Source: Transport for London

South Norwood Hill SB corridor



Source: Transport for London

Temporary LTN Measures

- 1 **9 May 2020**
Modal filter at
- Junction of Lancaster Road/ Southern Avenue
- Junction of Woodvale Avenue/ Avenue Road
- 2 **9 May 2020**
Modal filter at Junction of Lancaster Road/ Warminster Road
- 3 **7 June 2020**
Modal filter (now a Bus Gate) at Auckland Road by Cypress Road
- 4 **3 August 2020**
Modal filter on
- Stambourne Way
- Sylvan Hill
- Fox Hill

Road works

- A Auckland Road
- B Church Road
- C Westow Hill
- D Church Road
- E Sylvan Road
- F Westow Hill
- G Woodvale Avenue
- H South Norwood Hill
- I Auckland Road
- J Auckland Road

CHURCH ROAD (NORTHBOUND)

The baseline average of bus journey time along Church Road northbound is around 3 min/km. There was a spike in the average before the first lockdown in early March. It was very likely to be caused by the Candle shop car crash. As a result, the figure did not plummet a lot after the lockdown in March 2020, unlike all the other roads mentioned above.

Shortly before June, the figure increased above the baseline of 3 min/km and settled around 4 min/km for around a month and a half. The second spike brought the figure to around 9 min/km shortly after 4 July, when all restaurants were allowed to reopen.

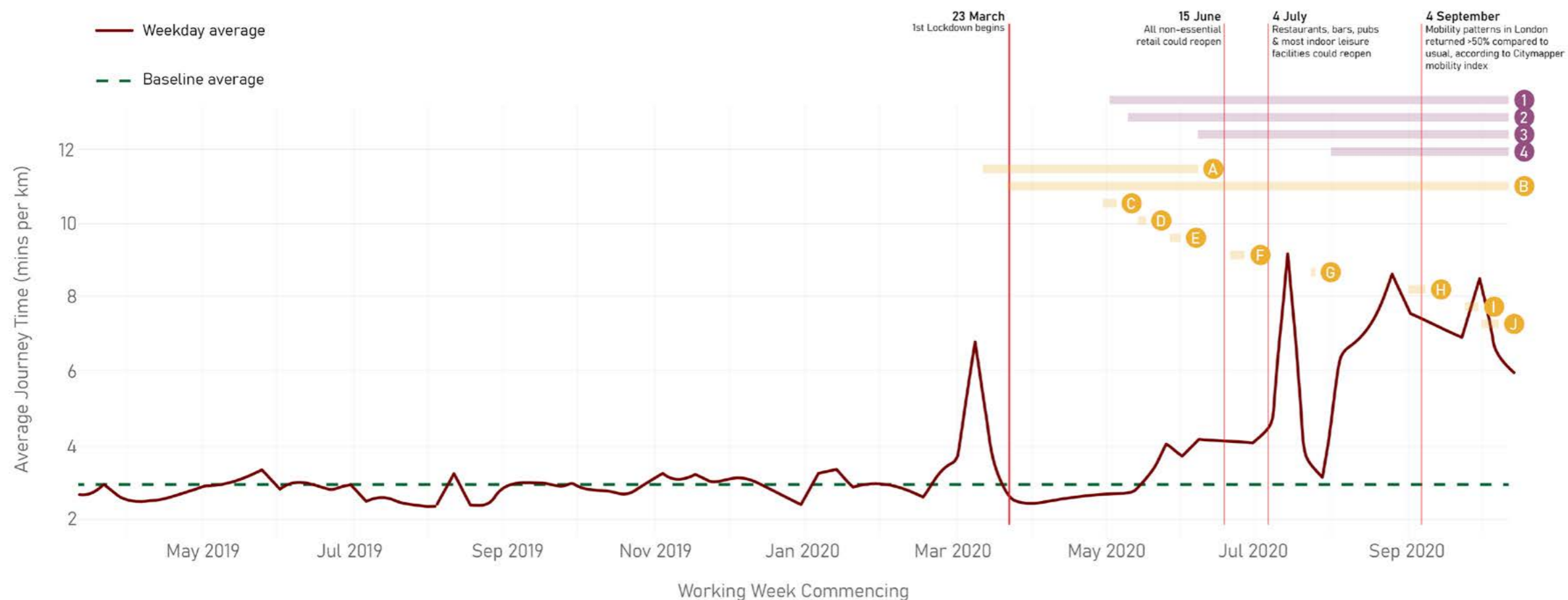
There was a large range of fluctuations between August and early October, ranging between 3 and 8.2 min/km. After the figure reached around 8.2 min/km, it decreased steadily to around 6 min/km at the end of the data period.

CHURCH ROAD (SOUTHBOUND)

The baseline average of bus journey time along Church Road southbound is around 3 min/km. Similar to the northbound, there was a spike in the average before the first lockdown in early March, likely to be due to the Candle shop car crash. The figure stayed mostly above the average since lockdown.

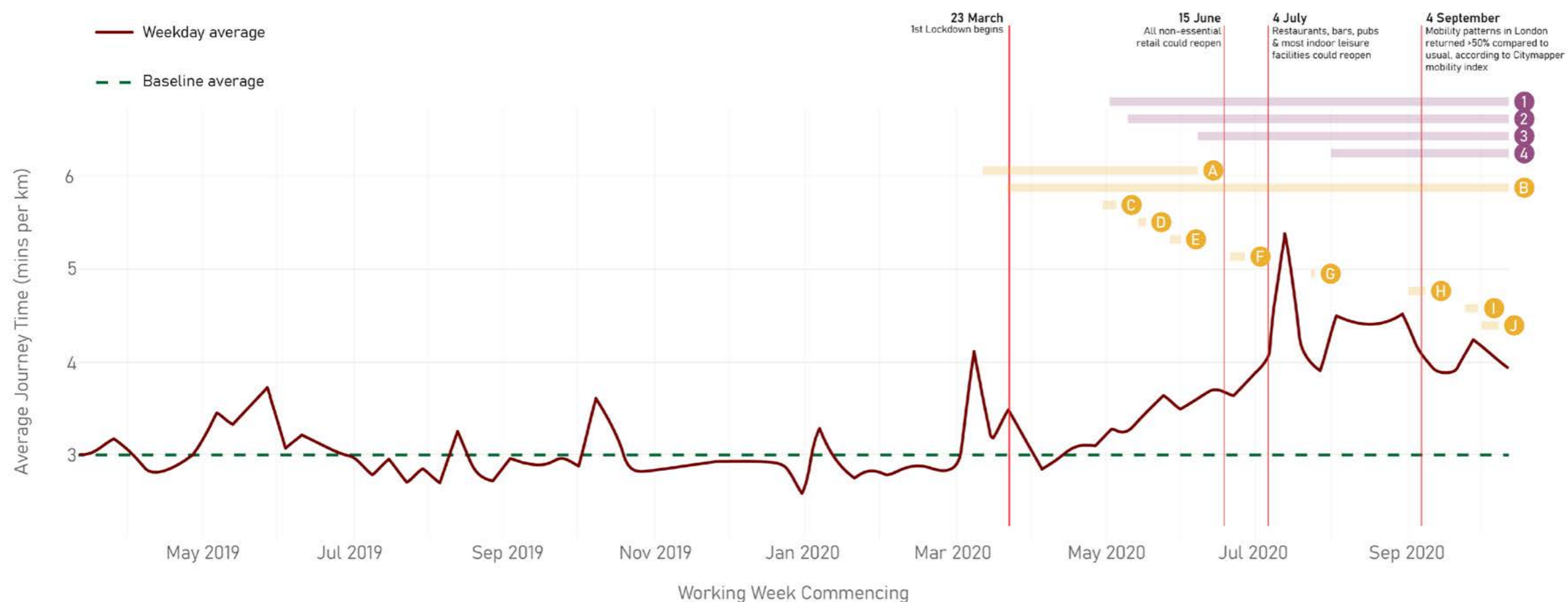
The figure gradually increased to around 4 min/km in July. There was then a spike to around 5.5 min/km after 4 July, when all restaurants were allowed to reopen. After that, there were fluctuations between an average of 4 to 4.5 min/km until the end of the data period.

Church Road NB corridor



Source: Transport for London

Church Road SB corridor



Source: Transport for London

Temporary LTN Measures

- 1 **9 May 2020**
Modal filter at
- Junction of Lancaster Road/ Southern Avenue
- Junction of Woodvale Avenue/ Avenue Road
- 2 **9 May 2020**
Modal filter at Junction of Lancaster Road/ Warminster Road
- 3 **7 June 2020**
Modal filter (now a Bus Gate) at Auckland Road by Cypress Road
- 4 **3 August 2020**
Modal filter on
- Stambourne Way
- Sylvan Hill
- Fox Hill

Road works

- A Auckland Road
- B Church Road
- C Westow Hill
- D Church Road
- E Sylvan Road
- F Westow Hill
- G Woodvale Avenue
- H South Norwood Hill
- I Auckland Road
- J Auckland Road

3.5 DISCUSSION

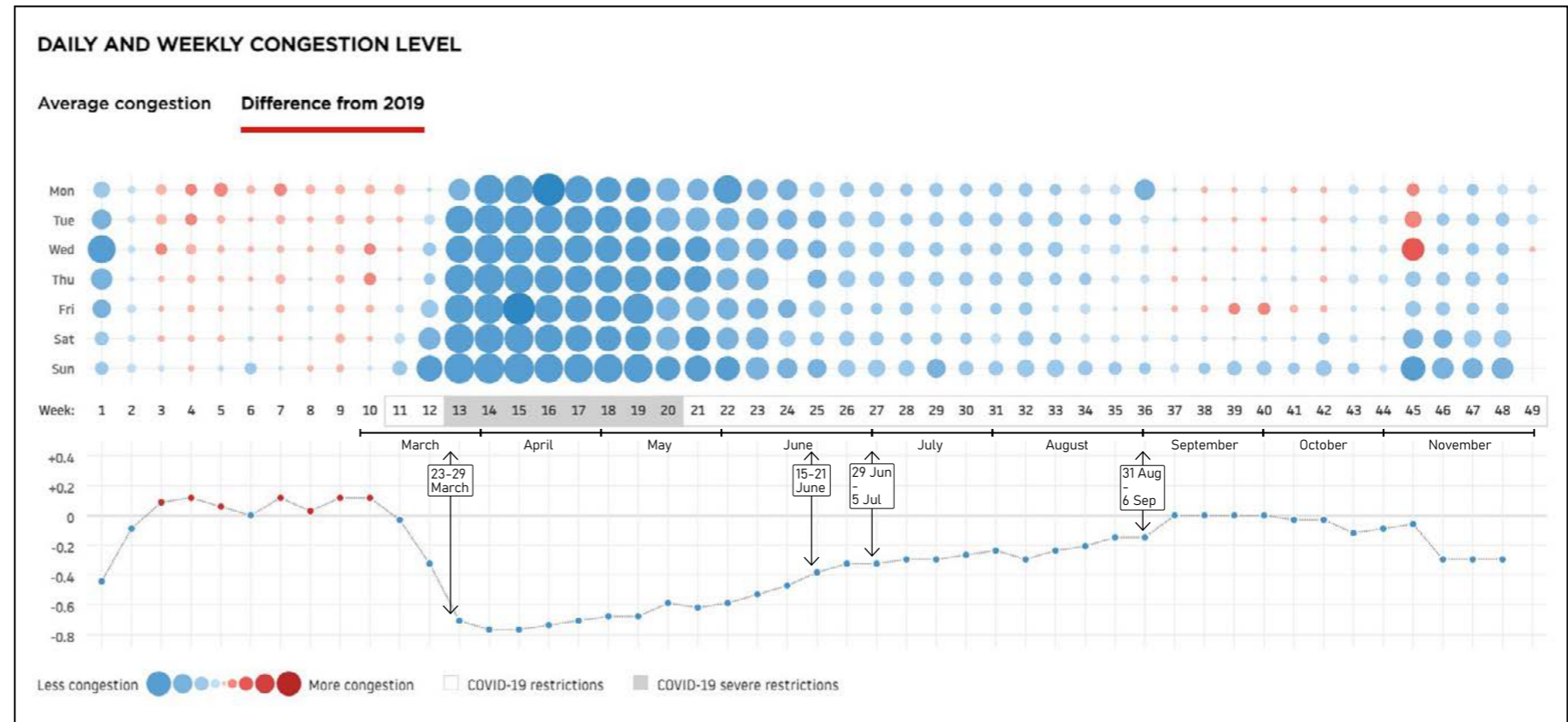
This section presents further analyses about the traffic data results. It begins with an overview on the background constraints in the study, then explains the traffic effects on the selected roads outside of the temporary LTN.

BACKGROUND CONSTRAINTS

The year of 2020 has seen an unprecedented drop and fluctuations in mobility patterns due to COVID-19. It has caused immense difficulty in the collection and analysis of traffic data.

As seen in TomTom's graph on the right showing London's daily and weekly congestion level in 2020, over half of the year has seen at least 20% less congestion than 2019. On the other hand, COVID-19 may also have changed the way how many people choose to travel, i.e. choosing private car over public transport for social distancing; or choosing cycling rather than private car due to less traffic on the road. The mode choice and travel patterns can change quickly over time.

As a result, it is difficult to determine whether the temporary LTN has a direct impact on the difference in traffic flows and journey time, as many of the assumptions we normally use in traffic analysis no longer apply.



55% of the time this year has shown at least 20% less than the daily congestion level in 2019 (TomTom)

We are able to suggest likelihood of relationships between the temporary LTN measures and the traffic situation nearby. However, we cannot determine direct causations with detailed calculation.

Since there was no comprehensive set of 'before LTN' ATC data covering the area we wish to monitor, we have used telematic data. The data presents in the format of estimated flow per hour for each road segment. As they are not actual, observed traffic counts, we cannot use the data to provide a robust calculation for traffic displacement.

TRAFFIC FLOWS AND JOURNEY TIME DIFFERENCE OUTSIDE LTN

Based on the data results presented in the previous sections, we are going to analyse the relationships between the changes in traffic flows and journey time, and to explain possible factors attributable to these traffic effects on the selected roads outside the temporary LTN.

Anerley Road

Anerley Road shows a general reduction of traffic flows, up to -29%, in both directions

for the daily average and the AM peak period. However, it shows a change in traffic flows ranging from +20% to -29% southbound in the PM peak. The increase was detected in proximity to the junction with Croydon Road.

The journey time difference shows a similar picture. It shows a reduction in median journey time in both directions (between -4.7% for route L2; and -9.3% for route L1) in the AM peak. For the PM peak, it shows a slight increase for northbound (+8.9%; +13s for route L1), but a large increase for southbound (+36.8%; +64s for route L2).

While the average bus journey time for northbound shows a considerable increase (from below the baseline of 3.8 min/km in late March to 4.9 min/km in October), it is unlikely to be caused by the temporary LTN measures as the data shows a clear reduction of traffic flow on the northbound. The bus journey time graph shows a fluctuation between 3.8 and 4.2 min/km between August and October, when mobility patterns gradually increased back to about 50% of the usual in London. The figure only increased drastically to 4.9 min/km since the start of October, but the last stage of LTN measures were introduced at the start of August.

For the southbound direction, while the daily average shows an overall reduction of traffic

flows on the southbound, there are has been increase in both the traffic flows and journey time for general traffic in PM peak. The average bus journey time for southbound remained below the baseline for most of the data period, without much changes in response to road works or different stages of the temporary LTN.

In addition, the increase on southbound was detected in proximity to the junction with Croydon Road, which could be contributed by the potential increase of traffic on Thicket Road, Oakfield Road and Maple Road. Therefore, we cannot establish a clear relationship on the journey time increase on southbound with the temporary LTN.

High Street-Penge Road

The road link of High Street-Penge Road shows a mixed picture in the change of the traffic flows. For eastbound, there has predominantly been a reduction in traffic in both AM peak (up to -43%; -370 vph), but a change between +18 and -104 vph (+3% to -14%) in the PM peak. The slight increase on eastbound in the PM peak was detected close to the junction with Portland Road and South Norwood Hill. For westbound, it shows an increase (up to +69%; +134 vph) in the AM peak and a reduction (up to -31%; -278 vph) in the PM peak. The increase on westbound

in the PM peak can be seen to have begun from Croydon Road to the east.

In term of journey time difference for general traffic, it also shows a mixed picture. There was a negligible increase in median journey time (+2.3%; +4s for route J11) on both directions in the AM peak. In the PM peak, the median journey time increase for both directions (+73.5s for both route J11 and J12) were also confined to the section near the junction with Portland Road and South Norwood Hill. This suggests that the increase in journey time along this road link is a result of traffic increase on High Street (west of the junction with South Norwood Hill).

The average bus journey time for both directions show minimal effect from the temporary LTN, as there were no spike in the figures around or after the first two modal filters were installed on or near Lancaster Road. Those measures have closed the through route from Penge Road since May. It is therefore safe to say the temporary LTN has a minimal effect on the traffic flows and journey time along High Street and Penge Road.

South Norwood Hill

South Norwood Hill shows a mixed picture in the change of traffic flow. For northbound,

there was a clear increase in the AM peak (up to +21%; +88 vph), but predominantly a reduction in the PM peak (between +18 and -140 vph; +4% to -20%).

As mentioned in Section 3.2, a continuous pattern of traffic increase in northbound direction can be observed in the AM peak, which begins from the southern end of South Norwood Hill. This pattern then continues along Church Road-Westow Street, turns right onto Westow Hill and travels up towards Crystal Palace Parade.

The traffic increase could be associated with the displacement of some northbound through traffic from the temporary LTN. This traffic increase also contributed to an +8.8% increase (+15s; route J13) of median journey time in AM peak. However this explanation could also be subject to challenge. As mentioned in Section 3.1, there has been more reduction in through traffic within the LTN in the PM peak than the AM peak. However, South Norwood Hill still saw predominantly a reduction (between +18 and -140 vph; +4% to -20%) in PM peak northbound. Decrease was also detected in southbound direction on both peaks as well.

The average bus journey time shows that the LTN measures might have posed some effect to the journey time. The figure for northbound

spiked up to around +50% (6 min/km) of the baseline in early August, shortly after the final stage of modal filters were installed on Stambourne Way, Sylvan Hill and Fox Hill. However, the figure reduced quickly back to around slightly more than the baseline in the end of August, suggesting limited impacts.

In contrast to the predominant decrease in traffic flows southbound, there was a huge increase in median journey time for general traffic in the PM peak (+125%; +140s for route L6 and +55.5%; +152s for route J14). Since there has been large increase in traffic on High street eastbound west of the junction with South Norwood Hill in the PM peak, it is suggested that the journey time increase on South Norwood Hill southbound was predominantly affected by the increase of right turning traffic from High street.

Church Road (Westow Street-Beulah Hill)

Similarly to South Norwood Hill, the Church Road section between Westow Street and Beulah Hill only shows an increase in traffic flows in the AM peak (up to +39%; +129 vph). PM peak for northbound, as well as both peaks for southbound have shown significant reduction in traffic flows (up to -62%; -268 vph). The traffic increase could also be associated with the displacement of some northbound through traffic from the temporary LTN.

The journey time for general traffic in the northbound direction, however, shows a conflicting picture. There was huge increase in the median journey time for both AM (+104.2%; +74.5s for route L7) and PM peak (+204.2%; +147s for route L7), despite there was only traffic increase recorded in the AM peak. The southbound median journey time decreased (-7%; -4.5s for route L8) and stayed the same in AM and PM peak respectively.

Unlike all the other roads mentioned above, the average bus journey time in both peak periods for both directions stayed above the baseline after first lockdown and increased steadily. For northbound, the figure fluctuated between 3 and 8.2 min/km, between August to early October. For southbound, the figure fluctuated between 4 to 5.5 min/km after 4 July and until the end of the data period.

After the candle shop car crash on 21 March, temporary signals were in place from 22 March to 1 November, with only one lane of traffic from either direction can pass at a time. This is identified as one of the major factors contributing to the sharp increase of journey time in both directions.

A spike in the average bus journey time can be spotted soon after 4 July when most restaurants could reopen. The journey

time increase could be associated with the temporary LTN, as there was a spike in average bus journey time soon after the final set of modal filters were installed on Stambourne Way, Sylvan Hill and Fox Hill on 3 August. These filters closed the remaining bidirectional through traffic route across the LTN between Anerley Road and Church Road. However, this does not explain why the traffic flows on Church Road only increased in the northbound direction for the AM peak (up to +39%; +129 vph), during all temporary LTN measures were being put in place.

The duration of the temporary signal arrangement on the southern section of Church Road overlapped almost exactly with the road closure/ temporary LTN measure have been in place on Auckland Road. In addition, the fluctuating mobility patterns due to easing and tightening of COVID related restrictions have complicated the relationship further. Therefore, it is unclear how much of the journey time increase on Church Road could be attributed to the temporary LTN.

Crystal Palace Triangle

Crystal Palace Triangle is a gyratory formed by the northern section of Church Road (between Anerley Hill and Westow Street), Westow Street and Westow Hill. In the AM peak, Westow Street and Westow Hill both

had an increase of traffic flow of +49% (+260 vph) and 7% (+114 vph) respectively, while the northern section of Church Road had a reduction of -11% (-57 vph). In the PM peak, all three roads had a reduction in traffic flows, with the rate ranging between -23% (-174 vph) and -45% (-258 vph).

Nevertheless, the median journey time for general traffic on almost all routes around the Triangle have recorded moderate to significant increase for both peak periods, with a more serious picture showing in the PM peak. These routes and their results are presented in the table on the right.

No average bus journey time data was provided by TfL for Westow Hill or Westow Street. As mentioned previously, the average bus journey time for Church Road southbound stayed above the baseline after first lockdown and increased steadily until early July, before it fluctuated between a range of 1.5 min/km before the end of the data period.

Due to the nature of one-way gyratory system in place around the Triangle, disruption close to any of the arms can cause grid relatively quickly. The temporary signal arrangement, located just south of the Triangle, was a potential cause of the increase in journey time for route J2 and

Route	AM Peak		PM Peak	
	% Change	Change in seconds	% Change	Change in seconds
J1 Anerley Hill (Beardell Street-Cintra Park) EB	+1.0%	+1 s	+5.3%	+8.5 s
J2 Crystal Palace Parade-Church Road (Bus station-St Aubyns Road) SB	+73.3%	+42.5 s	+182.3%	+124 s
J3 Westow Hill-Church Road (Beardell Street-N of Stoney Lane)	+16.3%	+20 s	+37.8%	+73 s
J19 Church Road-Westow Street (Fox Hill-Carberry Road) NB	+127.3%	+116.5 s	+196.3%	+161 s
J20 Central Hill (Gatestone Road-Beardell Street) EB	-1.1%	-1 s	+78.2%	+84.5 s
J21 Gipsy Hill-Westow Hill (Camden Hill Road-Beardell Road)	+18.3%	+7.5 s	+36.6%	+26 s

Journey time difference on routes associated with Crystal Palace Triangle

J19. Traffic going to the southern section of Church Road had to wait longer in the northern section. In addition, the increase of traffic flows (up to +39%; +129 vph) on Church Road (Westow Street-Beulah Hill) northbound has also contributed to the journey time increase around the Triangle in the AM peak, which might be pursuant to the temporary LTN.

While the PM peak shows a serious increase in journey time around the Triangle, all three

roads around it has shown reductions in traffic flows. Apart from the temporary signal arrangements, it could also be contributed by the significant increase of traffic along Central Hill westbound (+198 vph).

Selby Road-Seymour Villas

The road link of Selby Road and Seymour Villas in Neighbourhood 2 shows traffic flow increase on the northbound in both AM (up to +87%; +106 vph) and PM peak (up to +32%; +47 vph). In contrast, the southbound direction shows no change in traffic flows or a reduction up to -35% (-64 vph) amongst the two peak periods.

No journey time data for general traffic were collected for this road link. Majority of the routes around Neighbourhood 2 shows reductions in the median journey time (up to -12.5%; -14s for J6). There were a few routes with moderate increase, ranging from +1.2% (+1s, route J8 in AM peak) to +18.7% (+14s, route L4 in PM peak).

Majority of the roads outside Neighbourhood 2 had significant reductions in traffic flows, for instance, up to -31% (-278 vph) on Penge Road in the PM peak. As there were no considerable increase in journey time or traffic flows around Neighbourhood 2 during the temporary LTN was introduced, there is

no evidence to suggest that the temporary scheme has caused displacement of traffic towards the area. Therefore, there is minimal evidence to establish a direct relationship between the temporary LTN and the increase of south-north traffic flows along Selby Road and Seymour Villas in the AM peak.

4 CONCLUSIONS

4 CONCLUSIONS

PJA has conducted a study reviewing the Temporary Crystal Palace and South Norwood LTN. We have conducted a baseline analysis for the neighbourhood, and performed traffic analysis to review the effect of the temporary scheme.

BASELINE ANALYSIS

The key findings on baseline conditions of the neighbourhood are listed below:

- The neighbourhood is located between two District Centres and surrounded by trip attractors.
- Trip attractors are linked together by LCN and Croydon cycle routes, within 10-minute cycle distance
- Two railway links were located at both the northern and southern ends. Over half of the area has a modest PTAL between 1-3.
- Areas with lower accessibility to public transport generally have a higher car ownership percentage
- Most pupils attending the local schools located in the neighbourhood live within 3.1km of their school. These distances would be considered comfortably cyclable and potentially walkable.
- Two collisions within the neighbourhood involved children walking over the last three years.

- A school street scheme has been introduced on Cypress Road since February 2020, not long before the first Lockdown in March.
- Most areas in and around the neighbourhood have PM10, PM2.5 and NO2 concentrations over the WHO limit.

TRAFFIC EFFECTS

Through the process of Temporary Traffic Management Orders, LB Croydon installed six modal filters and a bus gate in the temporary LTN in four stages between May and August 2020.

Using the telematic data provided by The Floow, we have reviewed the traffic effects of the temporary LTN by comparing the through traffic levels, general traffic flows as well as journey time differences, before and during the temporary LTN was introduced.

Estimated Through Traffic Levels

Before the temporary LTN was introduced, the Hamlet Road-Auckland Road-Lancaster Road route was a popular through traffic route, heavily used by 70-170 vph (vehicle per hour) through traffic in both directions. PM peak generally recorded more through traffic than the AM peak.

The temporary scheme successfully reduced the percentage and volume of through traffic

across the LTN area. Through volume in AM peak reduced to less than or around 10 vph. PM peak saw slightly more through traffic left, with through volume generally reduced to below or around 20 vph on most roads.

Auckland Road section between Sylvan Hill and Cypress Road, being the only route connecting the northern and southern part of the temporary LTN, has shown a reduction of 80-120 vph in both peaks for the northbound, and 40-120 vph for the southbound.

Estimated Traffic Flows and Journey Time Difference

The key findings on the change in estimated traffic and journey time are listed below:

Anerley Road

- General reduction in traffic flows in both peak periods.
- Minimal or no journey time increase on most associated routes.
- No clear relationship can be drawn between the journey time increase on southbound with the temporary LTN. The increase was detected in proximity to the junction with Croydon Road.

High street-Penge Road

- Predominant reduction in traffic flows in both peak periods.

- Average bus journey time for both directions show minimal effect from the temporary LTN.
- Some increase in journey time along this road link in both peak periods; result of traffic increase on High Street (west of the junction with South Norwood Hill).

South Norwood Hill

- Traffic flow increase for northbound AM peak, while reduction on PM peak and southbound in both peaks.
- This traffic increase also contributed to a moderate increase of median journey time in AM peak.
- Potential traffic displacement from Auckland Road in the AM peak. A continuous pattern of traffic increase in northbound direction can be seen in the AM peak, which begins from the southern end of South Norwood Hill.
- This pattern then continues along Church Road-Westow Street, turns right onto Westow Hill and travels up towards Crystal Palace Parade.

Church Road (Westow Street-Beulah Hill)

- Traffic flow increase for northbound AM peak, while reduction on PM peak and southbound in both peak periods.
- Serious increase in northbound median journey time in both peak periods.

- Potential traffic displacement from Auckland Road might have effect on journey time in the AM peak.
- Due to temporary signal arrangement on the southern section of Church Road overlapped almost exactly with the road closure/ temporary LTN measure, it is unclear how much of the journey time increase on Church Road could be attributed to the temporary LTN.

Crystal Palace Triangle

- Median journey time for general traffic on almost all routes around the Triangle have recorded moderate to significant increase for both peak periods, with a more serious picture showing in the PM peak.
- Potential traffic displacement from Auckland Road might have effect on journey time around the Triangle in the AM peak.
- While the PM peak shows a serious increase in journey time around the Triangle, all three roads around it have shown reductions in traffic flows.
- Under the nature of one-way gyratory system, the temporary signal arrangements and the significant increase of traffic along Central Hill westbound have caused the gridlock in the PM peak.

Neighbourhood 2

- Increase of south-north traffic flows along Selby Road and Seymour Villas in the AM peak.
- No considerable increase in journey time or traffic flows around Neighbourhood 2 during the temporary LTN was introduced.
- No evidence to suggest that the temporary scheme has caused displacement of traffic towards the area.

RECOMMEDATIONS

Due to an anomaly for the through traffic data, which shows the roads between Hamlet Road, Auckland Road and Sylvan Hill still being heavily used by through traffic (despite an intact modal filter in place), we recommend LB Croydon to verify the actual situation along this section of roads using Automatic Traffic Counters (ATCs).

In addition, we suggest LB Croydon should consider monitoring the effects of the temporary LTN comprehensively, with ATCs after the traffic flows have returned normal.

We recommended LB Croydon to collaborate with LB Bromley, to coordinate change to the area. These include the installation of modal filters on Selby Road and Seymour Villa to stop through traffic passing through Neighbourhood 2, and the enhancement of cycle connection to Crystal Palace Park.

APPENDIX

APPENDIX: TRAFFIC COUNTS DURING SECOND LOCKDOWN

To supplement the traffic flow estimates generated with telematic data, LB Croydon has commissioned a series of traffic flow counts between 26 November and 2 December 2020. The plan showing the average weekday flow of vehicles, per day by direction, is presented overleaf.

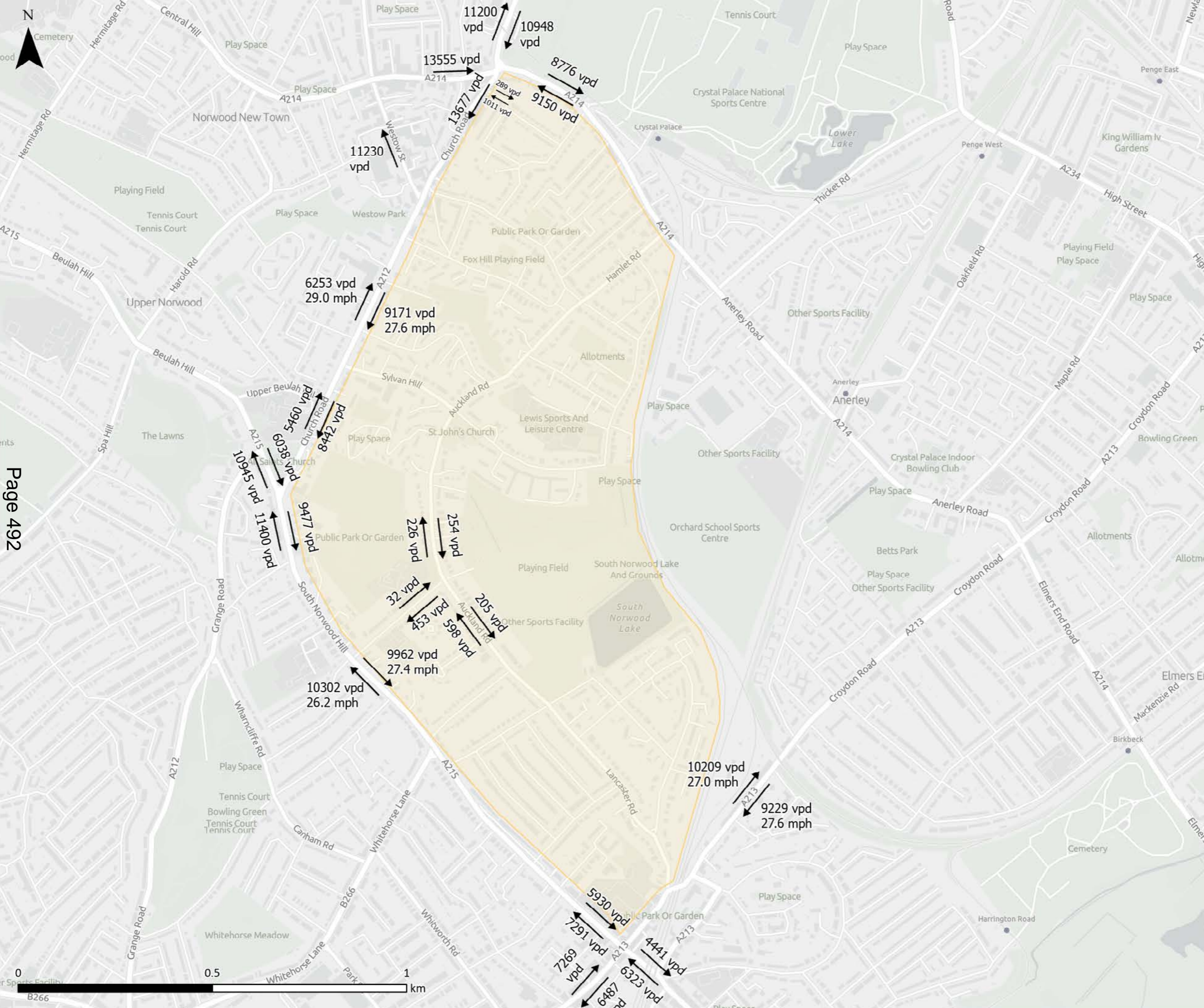
The traffic counts were collected after all temporary LTN measures were introduced, but during the second Lockdown. Therefore, the flows are likely to be lower than periods with looser COVID restrictions, and should be taken as reference only. This data cannot be used for like-for-like comparison with telematic data.

Some key findings on the traffic counts are listed below:

- Auckland Road: The section north of Cypress Avenue only recorded circa 250 vehicles per day (vpd) on each direction. That is about 10 vpd divided by 24 hours (and 16 vpd if divided by 16 hours).
- Church Road: More flows were recorded on the southbound (9171 vpd) than the northbound (6253 vpd).
- Westow Street/Church Road junction:
 - 50-55% of traffic on Westow Street came from Church Road northbound

- 40-45% of traffic on Westow Street came from Church Road southbound (mostly heading to Central Hill westbound)
- South Norwood Hill: About 30-40% of traffic in both direction were related to Whitehorse Lane. Only about 60-70% of traffic were recorded coming from or heading to the junction with High street and Portland Road.

In addition, 85th percentile speeds were also collected by direction on Church Road, South Norwood Hill and Croydon Road. All of which show 85th percentile speeds below the posted speed limit of 30mph.



Temporary Crystal Palace & South Norwood LTN

Remarks:
 - vpd = average weekday daily vehicle flow (24-hour average)
 - Speed shown in this plan are 85th percentile speeds over the 7-day data collection period

Traffic Count data collected between 26 November and 2 December 2020 (During 2nd lockdown)
 Contains OS data © Crown Copyright and database right 2020
 Contains data from OS Zoomstack

PJA The Aquarium King Street Reading RG1 2AN T. 0118 956 0909

CLIENT
London Borough of Croydon
 PROJECT
Crystal Palace & South Norwood LTN
 TITLE

TRAFFIC COUNTS
26 NOV-2 DEC 2020
(AVERAGE WEEKDAY DAILY FLOW AND 85TH PERCENTILE SPEED)

SCALE	DRAWN	REVIEWED	DATE
A3 @ 1:9,000	JY	-	17/12/2020
FIGURE NUMBER	REVISION		
35	-		





Prepared: Justin Yim
Reviewed: John McQueen & Ben Coleman
Issued: John McQueen
21.12.2020 - v2.6 TBA
PJA, The Aquarium, King Street, Reading, RG1 2AN

CROYDON
www.croydon.gov.uk



FRIDAY 4TH DECEMBER

CRYSTAL PALACE LTN MONITORING



Monitoring Area

Bus journey times have been monitored for the sections highlighted purple below. These comprise 6 bi-directional corridors, which in most cases include journey times for multiple routes:

- **Anerley Road** (routes 157, 249, 354, 358, 410, 432)
- **Auckland Road** (route 410)
- **Church Road** (route 249)
- **Crystal Palace Parade** (routes 3, 122, 202, 227, 363,
- **Norwood Hill** (routes 196, 468)
- **Penge Road** (routes 75, 157, 197, 356)



SCOOT data was also used to monitor bus & traffic impact.

- Astrid Flow Data – To compare the amount of flow moving through the network during the installing, operating, removal of temp signals and LTNs.



Roadworks and Closures

- **22nd March** - Scaffold / Temp signals implementation
- **June - July (exact dates unknown)** – Auckland Road closed for SGN gas works
- **21st August** - LTN implementation



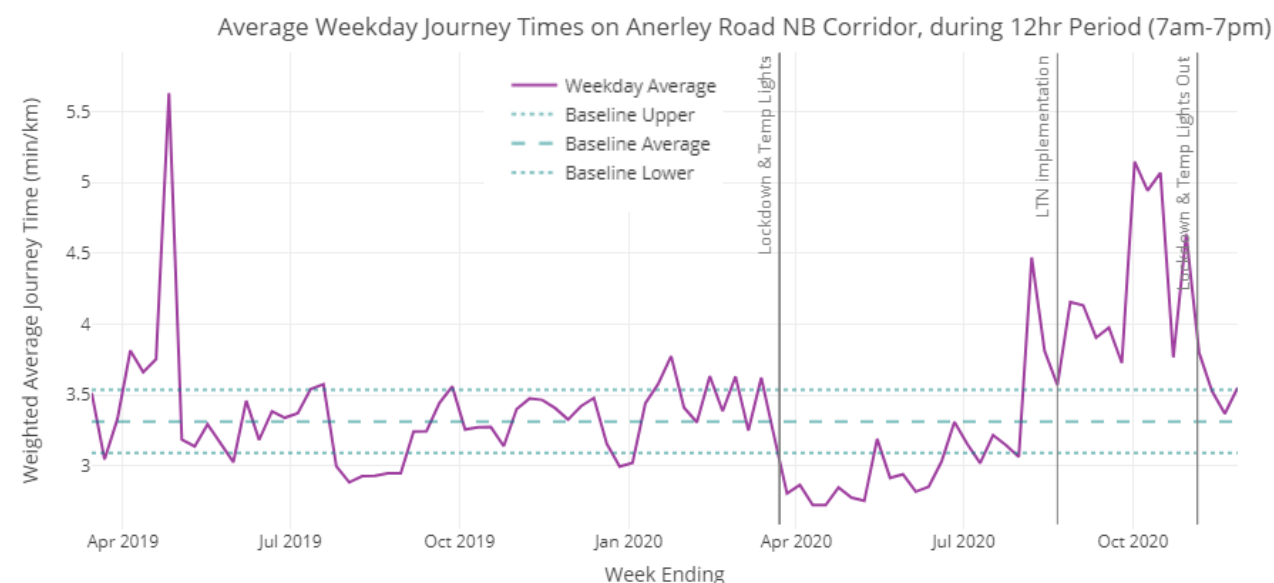
Road/Section of Road Name	2. Closed between	3. TTRO start date	4. Expiry of TTRO
Lancaster Road, South Norwood (fronting Nos. 2 to 8 Lancaster Road)	Southern Avenue, South Norwood	22/05/20	22/11/21
Auckland Road (fronting property Nos. 70 to 110 Auckland Road), Upper Norwood	Cypress Road, Upper Norwood	03/07/20	03/01/22
Fox Hill, Upper Norwood	Braybrooke Gardens, Upper Norwood	21/08/20	21/02/22
Stambourne Way, Upper Norwood	Auckland Road, Upper Norwood	21/08/20	21/02/22
Sylvan Hill, Upper Norwood	Between Nos. 11 & 13 Sylvan Hill, Upper Norwood	21/08/20	21/02/22

- **1st November** - Scaffold / temp signal removal
- **1st – 3rd November** – SCOOT fault at Anerley and Church Road junction
- **10th November** – Temp signals on Anerley for Thames works (1 day only, very large delays)



Bus Journey Times: Anerley Road Corridor

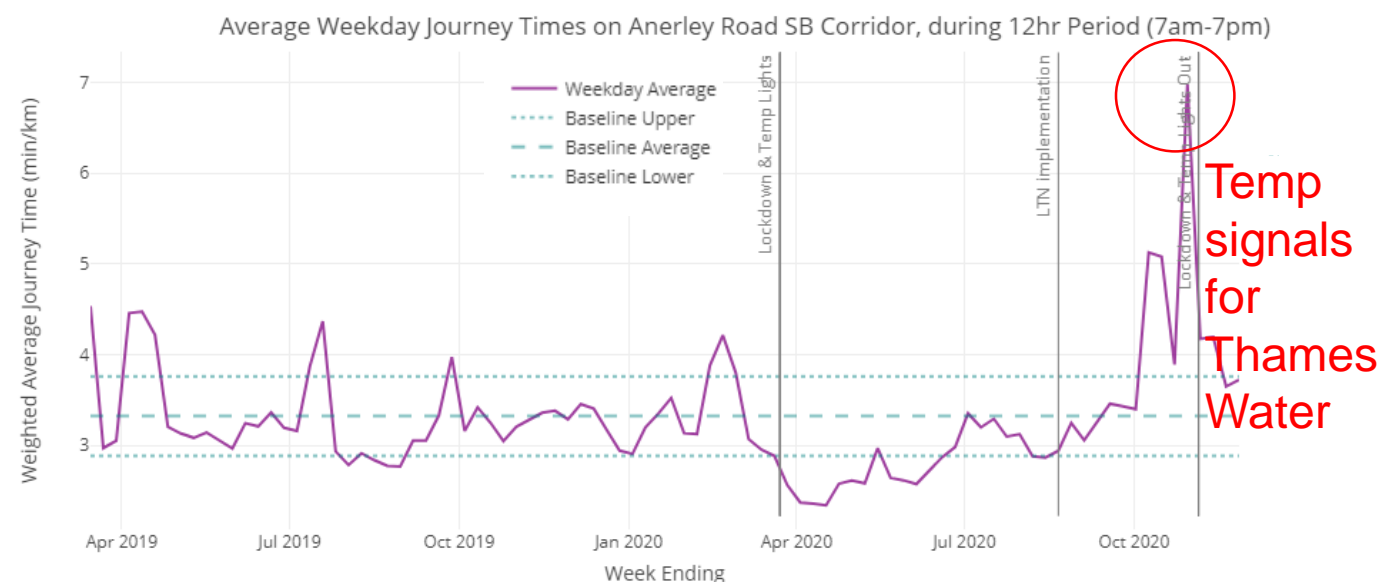
The Anerley Road corridor has shown increased journey times since scheme implementation. These reduced with the 2nd lockdown / temp lights being removed.



The **NB** journey times increased post-implementation and exceeded the threshold 13 of the 15 weeks.

Journey times were **0.2 min/km (7%) higher** 7am-7pm W/E 27th Nov than the baseline (Mar 2019-Mar 2020) average.

The **SB** journey times also increased post-implementation and exceeded the threshold 6 of the 15 weeks.



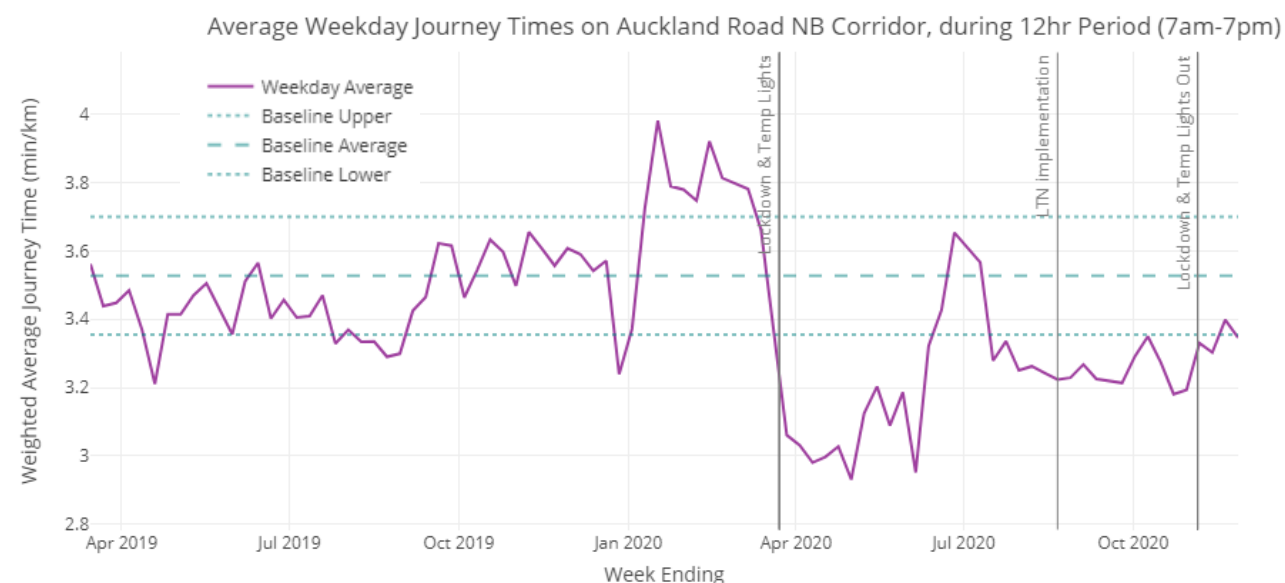
Journey times were **0.4 min/km (12%) higher** 7am-7pm W/E 27th Nov than the baseline (Mar 2019-Mar 2020) average.

Journey times have decreased in both directions in recent weeks since the removal of the temp signals.



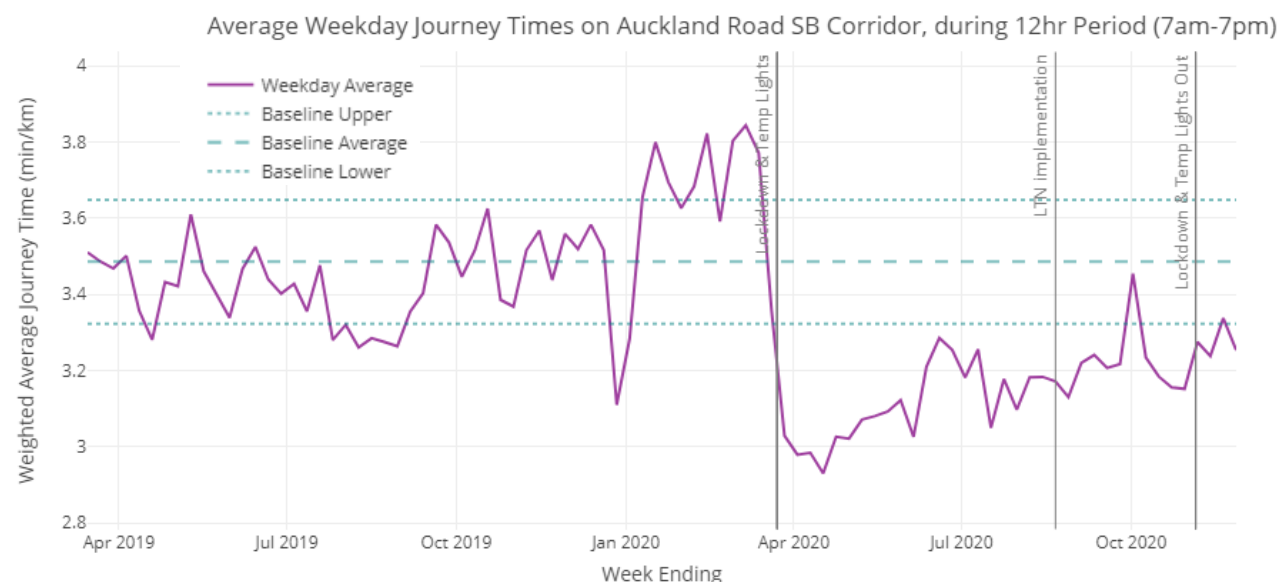
Bus Journey Times: Auckland Road Corridor

The Auckland Road corridor has consistently shown reduced journey times compared to last year.



The **NB** journey times dropped with the first lockdown and remained low. Weekly averages have been consistently lower than the baseline mean, and often lower than the baseline lower threshold.

Journey times were **-0.2 min/km (-5%) lower** 7am-7pm W/E 27th Nov than the baseline (Mar 2019-Mar 2020) average.

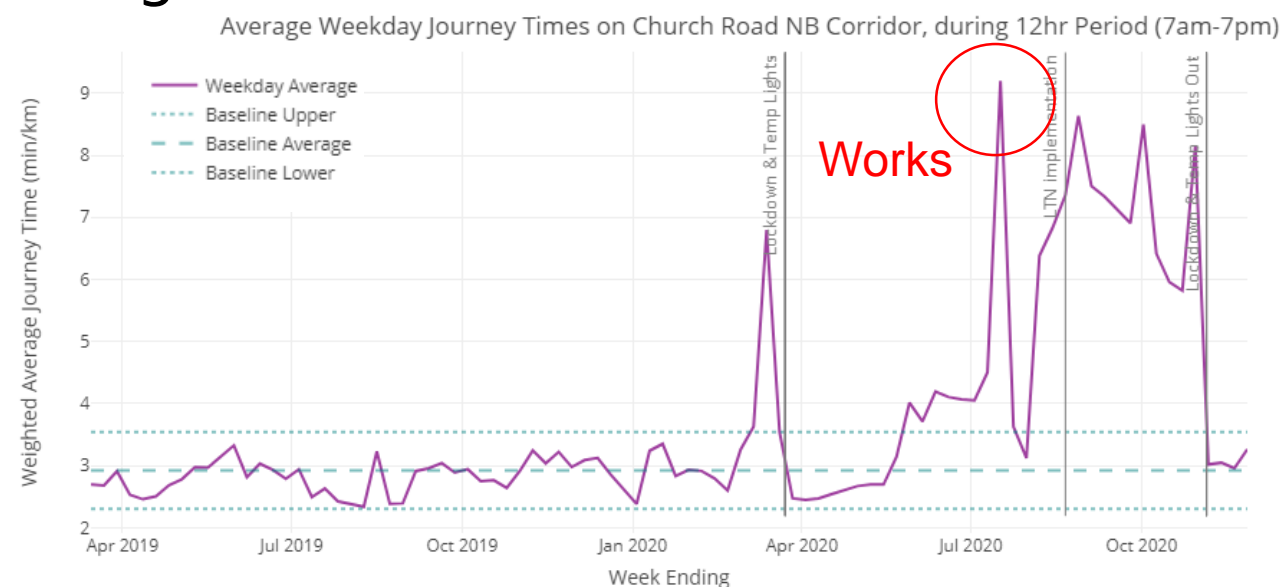


The **SB** journey times also dropped with the first lockdown and remained low. Weekly averages have been consistently lower than the baseline mean, and often lower than the baseline lower threshold.

Journey times were **-0.2 min/km (-7%) lower** 7am-7pm W/E 27th Nov than the baseline (Mar 2019-Mar 2020) average.

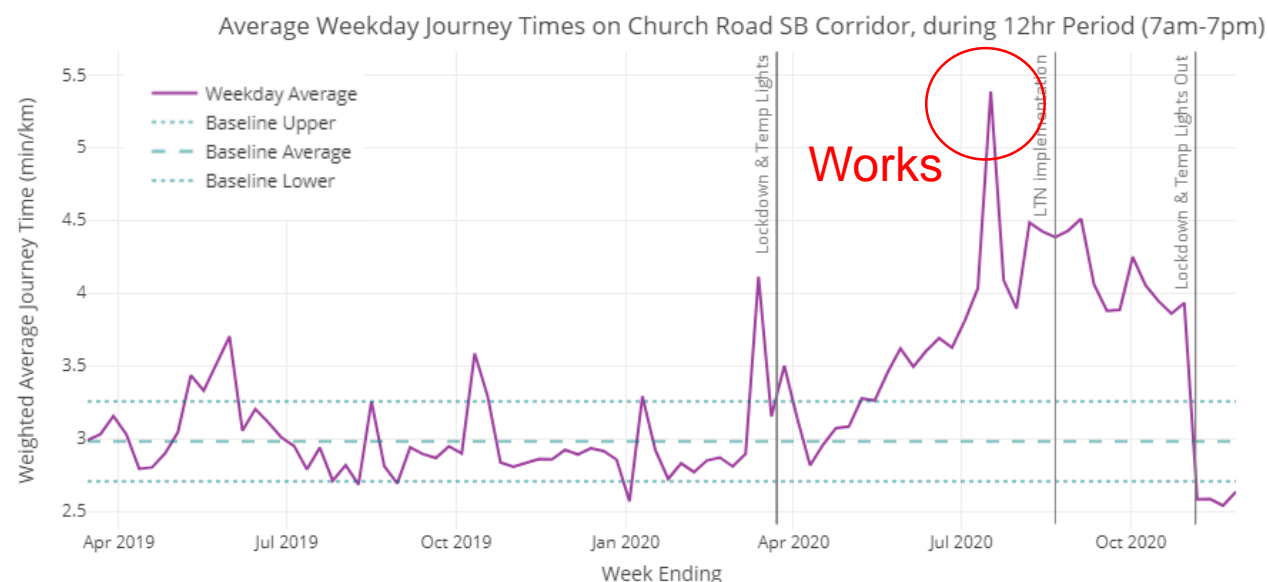
Bus Journey Times: Church Road Corridor

The Church Road corridor has shown increased journey times both pre & post scheme implementation. These reduced with the 2nd lockdown / temp lights being removed.



The **NB** journey times increased from a few weeks pre-implementation and exceeded the threshold 11 of the 15 weeks.

Journey times were **0.3 min/km (12%) higher** 7am-7pm W/E 27th Nov than the baseline (Mar 2019-Mar 2020) average.



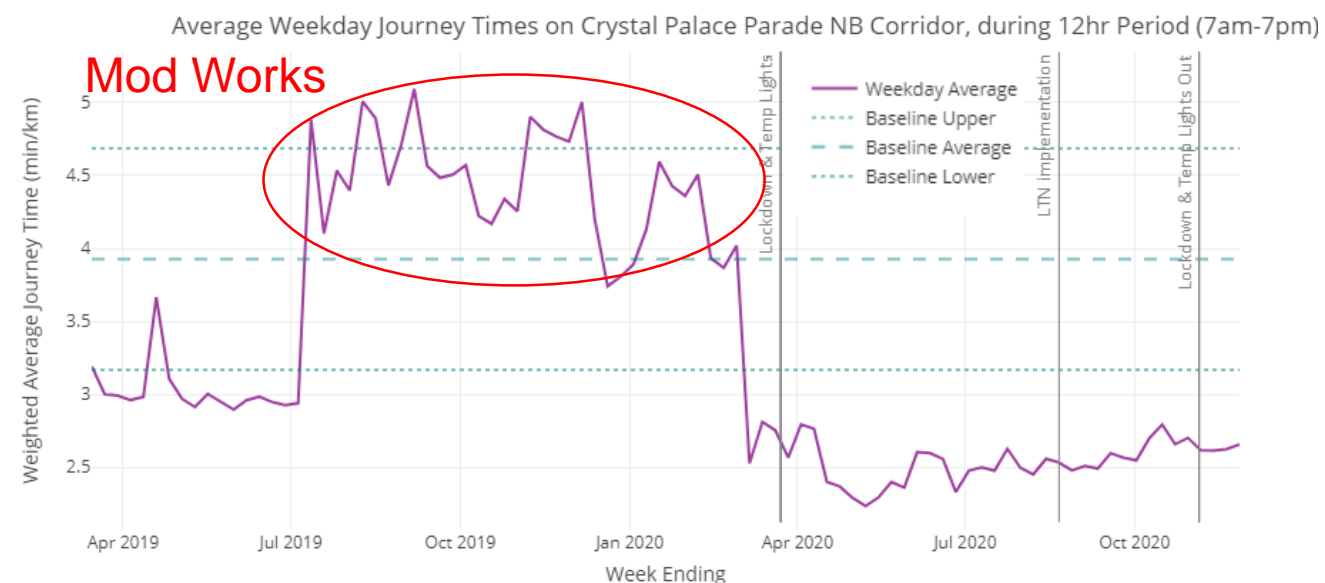
The **SB** journey times have been increasing since the first lockdown and exceeded the threshold 11 of the 15 weeks.

Journey times were **-0.3 min/km (-12%) lower** 7am-7pm W/E 27th Nov than the baseline (Mar 2019-Mar 2020) average.

Journey times have decreased in both directions in recent weeks since the removal of the temporary signals.

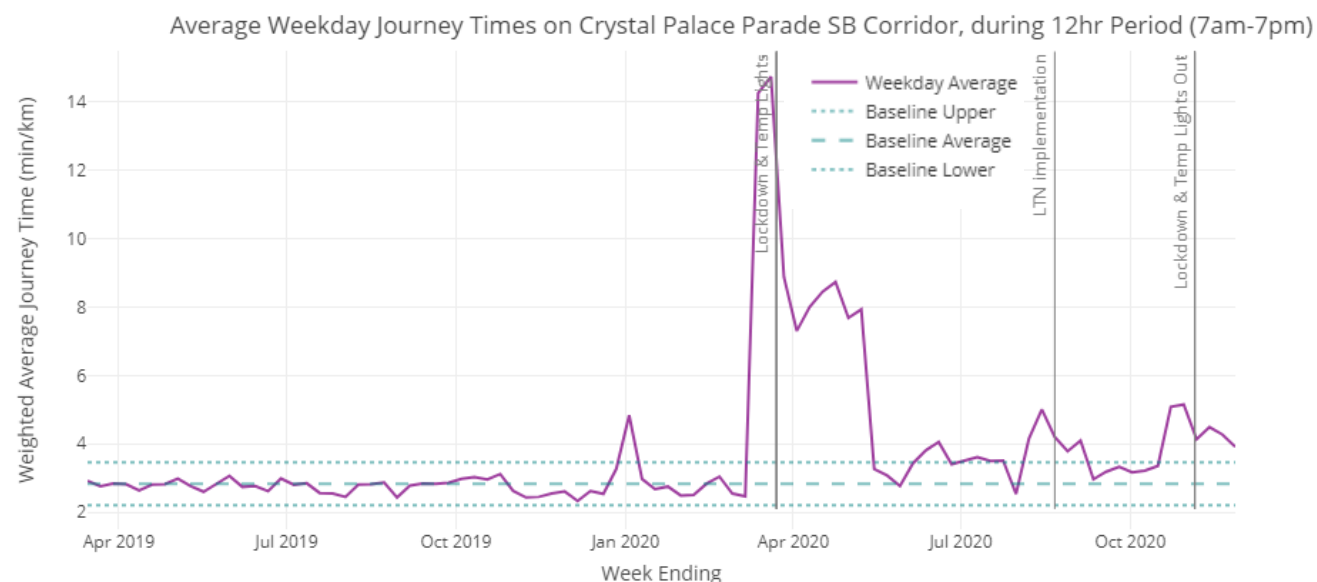
Bus Journey Times: Crystal Palace Parade Corridor

The Crystal Palace corridor has shown increased journey times in the SB direction and reduced journey times in the NB direction.



The **NB** journey times did not increase post-implementation and weekly averages have consistently been below the baseline lower threshold.

Journey times were **-1.3 min/km (-32%) lower** 7am-7pm W/E 27th Nov than the baseline (Mar 2019-Mar 2020) average.



The **SB** journey times increased when the temp lights went in. They dropped in May but have still been exceeding the threshold 9 of the 15 weeks post-implementation.

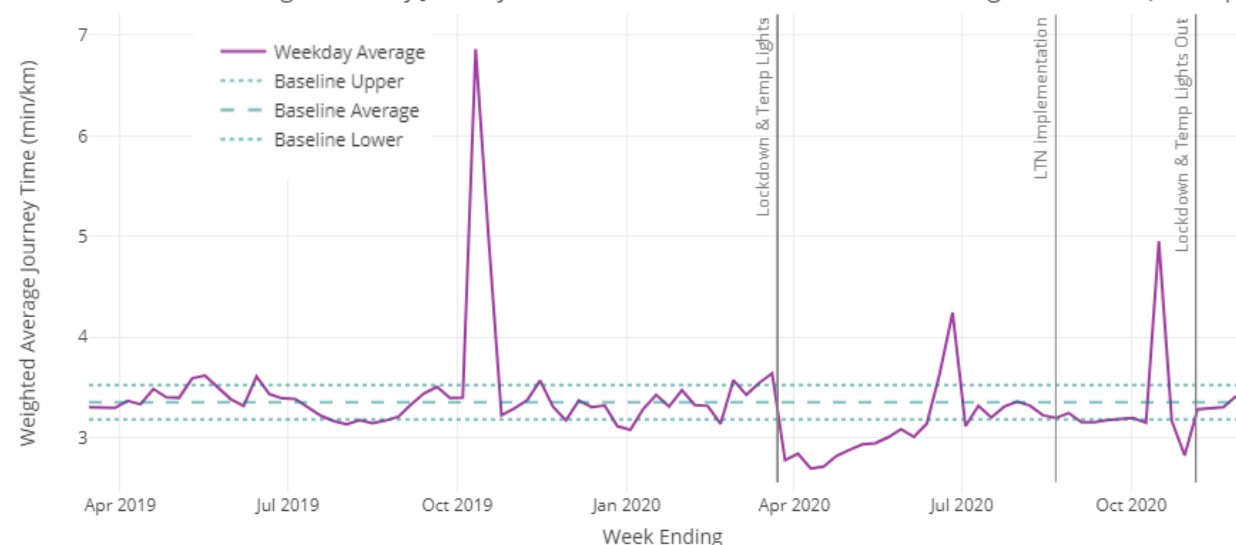
Journey times were **1.1 min/km (38%) higher** 7am-7pm W/C 27th Nov than the baseline (Mar 2019-Mar 2020) average.



Bus Journey Times: South Norwood Hill Corridor

The Norwood Hill corridor has shown increased journey times SB but level journey times with last year NB.

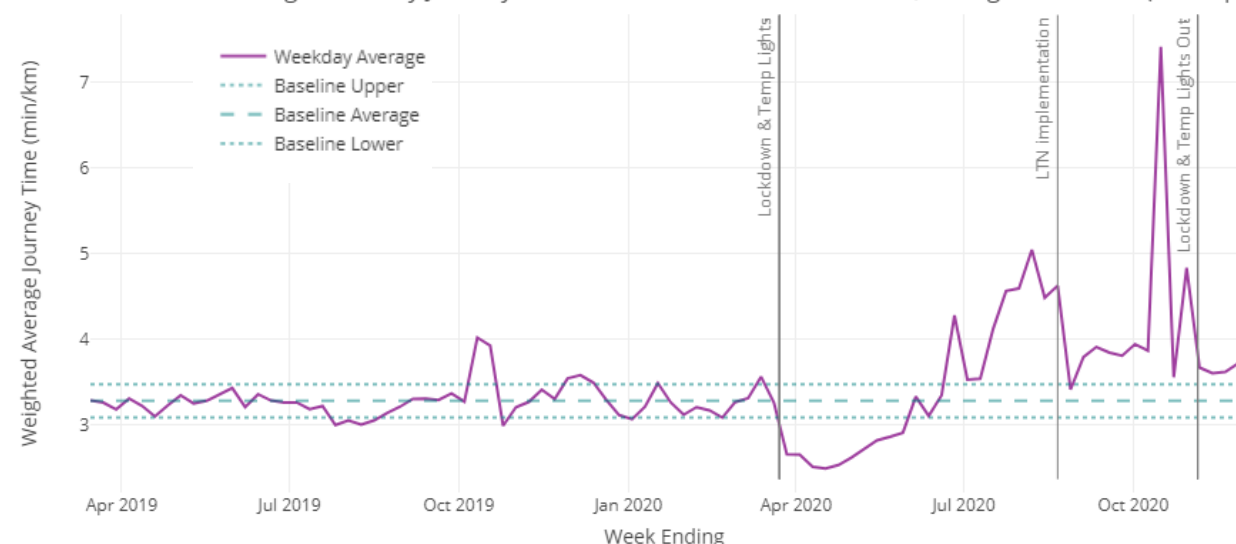
Average Weekday Journey Times on Norwood Hill NB Corridor, during 12hr Period (7am-7pm)



The **NB** journey times did not increase post-implementation and only exceeded the threshold once on W/E 16th Oct.

Journey times were **0.1 min/km (2%) higher** 7am-7pm W/E 27th Nov than the baseline (Mar 2019-Mar 2020) average.

Average Weekday Journey Times on Norwood Hill SB Corridor, during 12hr Period (7am-7pm)



The **SB** journey times increased from a few weeks pre-implementation due to the gas works on Auckland Road, and continue to be high post-implementation. They exceeded the threshold 14 of the 15 weeks.

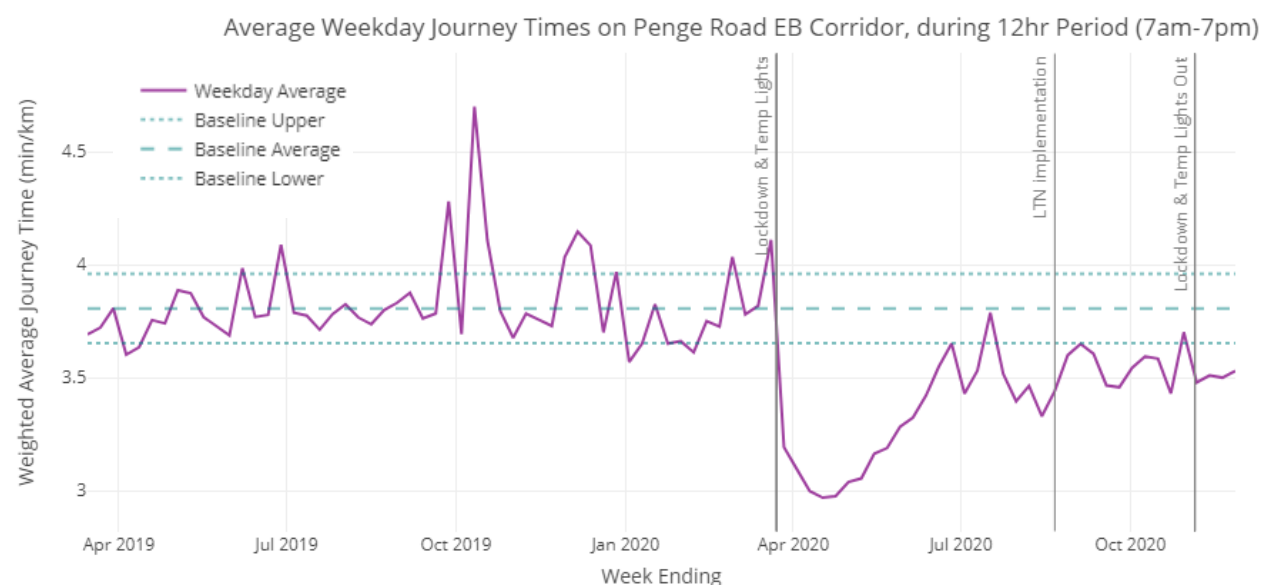
Journey times were **0.4 min/km (13%) higher** 7am-7pm W/E 27th Nov than the baseline (Mar 2019-Mar 2020) average.

Page 501



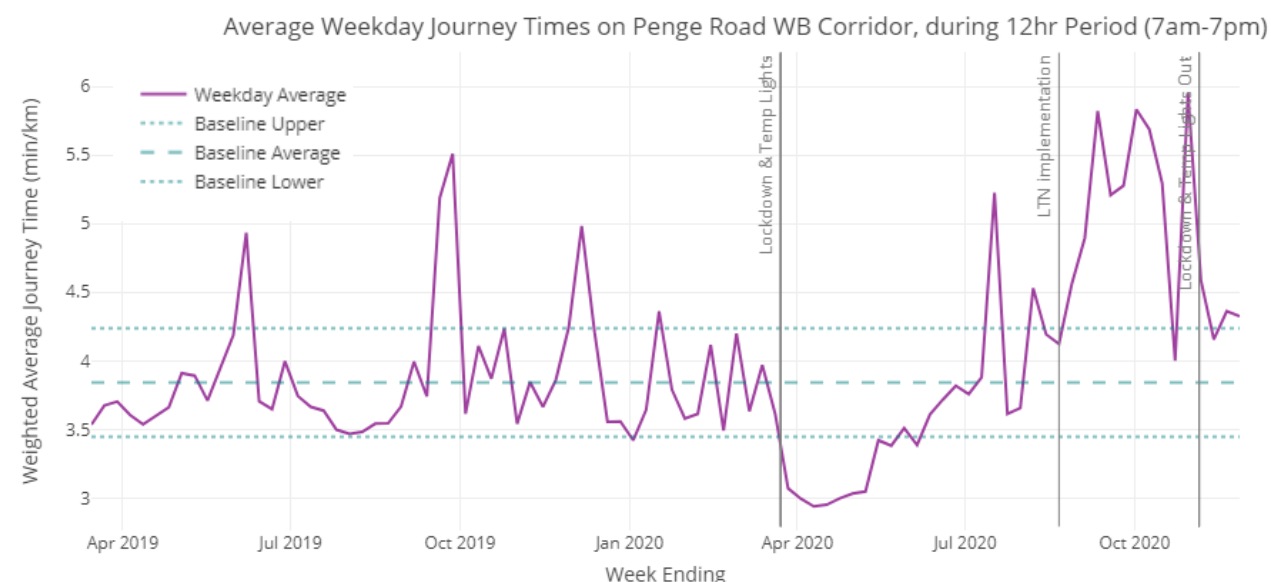
Bus Journey Times: Penge Road Corridor

The Penge Road corridor has shown increased journey times in the WB direction but not in the EB direction.



The **EB** journey times did not increase post-implementation. Weekly averages have been consistently lower than the baseline mean, and often lower than the baseline lower threshold.

Journey times were **-0.3 min/km (-7%) lower** 7am-7pm W/E 27th Nov than the baseline (Mar 2019-Mar 2020) average.



The **WB** journey times increased through lockdown and post-implementation and exceeded the threshold 11 of the 15 weeks. Journey times have decreased in recent weeks but remain above the upper threshold.

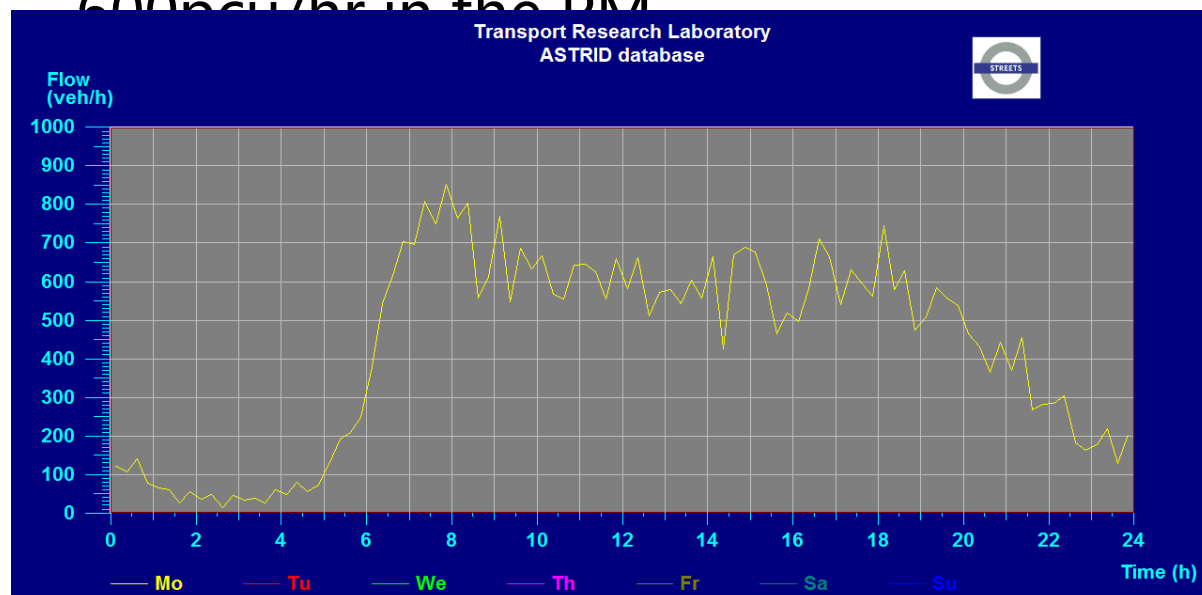
Journey times were **0.5 min/km (13%) higher** 7am-7pm W/E 27th Nov than the baseline (Mar 2019-Mar 2020) average.



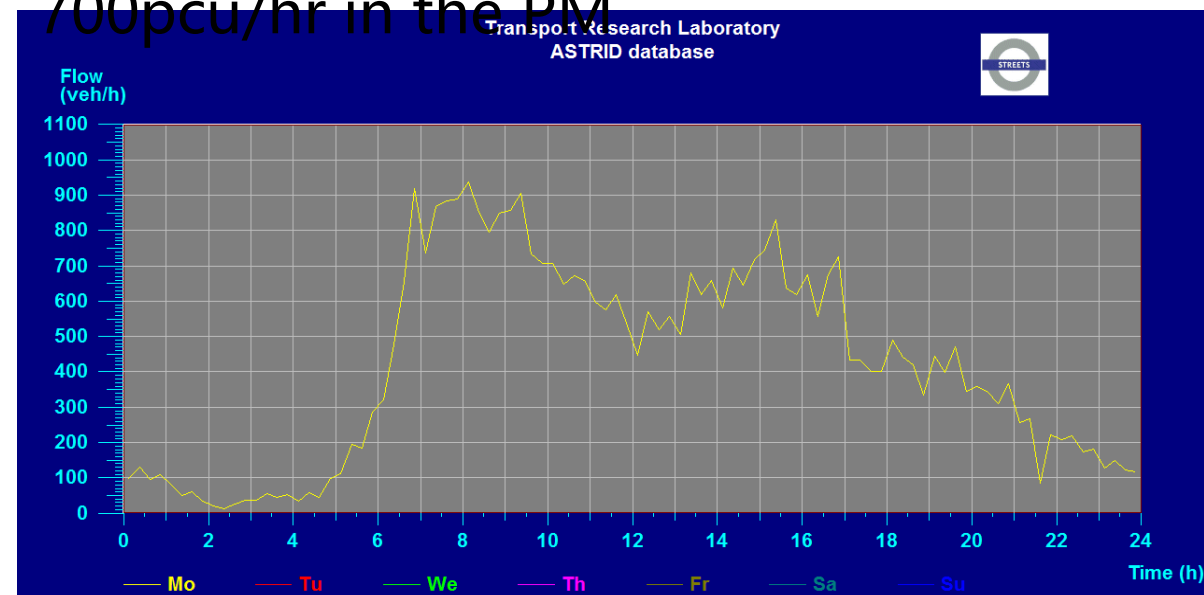
Astrid Flow Data

SCOOT data was able show that more traffic flow was moving along Anerley Hill once the temp signals were removed.

Oct 2020 – shows approx.
800pcu/hr in the AM and
600pcu/hr in the PM



Nov 2020 – shows approx.
900pcu/hr in the AM and
700pcu/hr in the PM



Appendices

The following slides give some detail on the methodology.

The graphs & figures included in the slides above can be found in the dashboard [here](#).



Buses methodology

Scope

- Weekly iBus data has been used for this analysis. This gives weekday (Mon-Fri) average journey times (excluding dwell times) by route, stop-to-stop link and peak.
- Data included is from W/E 15/03/19 to W/E 27/11/20. W/E 24/05/19 was excluded as there was missing data this week.
- 6 key corridors were studied (in both directions), as detailed on the first slide.

Methodology

- The corridor averages shown are a weighted average across the journey times for all routes running along the corridor, based on the route frequency. This means the corridor average is skewed towards the higher frequency routes.
- The route level journey times are found by taking the total journey time across stop-to-stop links along the corridor and dividing by the length of these links, to give a min/km figure. This is what is then averaged across routes.
- Corridor average journey time trends have been plotted against thresholds. These thresholds are meant to represent "normal" journey times.
- Threshold values were found by taking the mean +/- 1 standard deviation, for the weekly corridor averages during the baseline period (11 March 2019 – 13 March 2020). This allows for a reasonable amount of week-to-week variation but gives a threshold above which journey times would be deemed above "normal".



Consultation

5 (a) The consultation letter, sent to residences within the LTN

November 2020

PUBLIC CONSULTATION

CROYDON | Delivering
www.croydon.gov.uk | for Croydon

XXXXXX
XXXXXX
XXXXXX

Future of the Temporary Crystal Palace and South Norwood Low Traffic Neighbourhood

We are writing to inform you of the upcoming consultation on the Crystal Palace and South Norwood Low Traffic Neighbourhood (LTN) introduced on a temporary basis earlier this year.

As a result of the Covid-19 pandemic, central government issued guidance to local authorities to move quickly, making changes to our streets for social distancing and to encourage walking and cycling. Using funding from Transport for London, we implemented measures to reduce through traffic in the Auckland Road / Southern Avenue area creating quieter and safer space to walk and cycle while capacity was reduced on public transport. By helping more people to walk and cycle rather than drive short journeys, the temporary scheme is also aimed at tackling air, pollution, congestion, speeding and improving overall road safety.

The LTN was implemented in stages based around the gas utility works closing Auckland Road, at the ending of those works. After hearing some initial concerns, we swiftly put in a bus gate to maintain access for the 410 bus, and emergency vehicles this was all at the time Church Road was half closed, with temporary traffic signals significantly impacting on the capacity of the A212 and A214. As the temporary LTN moved to its current form, we sought feedback via our Streetspace webpage interactive map. Over 2000 people reached out to share their views. Comments from the survey and emails received to our 'highways improvement' inbox indicated some clear themes:

- Patients driving to the Auckland Surgery need improved access
- Emergency service vehicles need more direct access
- The council should have consulted before implementing the temporary LTN
- The LTN doesn't work for us. It should be removed and streets returned to allow for through traffic
- The temporary LTN is welcomed. The need to reduce through traffic is understood, however the scheme disadvantages local residents by limiting access. Car access for local residents to their homes should be improved through alternative measures, such as camera-enforced entry points (ANPR cameras)
- The temporary LTN is liked, it has created a quieter, safer local street environment and neighbourhood
- Air pollution on main roads and in surrounding areas is worse
- Local businesses will be impacted by increased congestion on Church Road

Our proposals for the next stage of the scheme seek to address many of these concerns.

We are very appreciative to everyone for taking the time to submit feedback. Having listened, we are inviting the public to participate in a consultation on the future of the scheme. You can view the consultation material in full online and submit your response from **6 November 2020** until **4 December 2020** on our dedicated consultation webpage.

The link will go live on our Streetspace webpages available at croydon.gov.uk/streetspace – or through the QR code here:



How do I participate?

It is important that you carefully note how to complete the online form, using the information below and on our webpage. We are asking local residents to enter the **unique ID code** below in your survey response, to make our analysis much more informative and robust.

While the consultation is open to all those who consider themselves affected, we are hoping to capture the feedback from those living within the scheme boundary with more specific detail. This is the purpose of the unique ID codes.

Those without Internet access or with accessibility needs can request a printed copy of the consultation material. Requests must be submitted via the council's contact centre by phoning: 020 8726 7000.

Your unique ID code is:

XXXX – XXXX, XXXX, XXXX

When responding you must enter **4 digit code** followed by your **full address** into our online form. Responses will be accepted no later than **4 December 2020 at 9:00 pm**.

Who else is being consulted and how will other concerns from the themes be addressed?

We are consulting local ward councillors, schools, emergency services and residents of nearby boroughs, to help inform the decision making process. The range of options available is described on the survey portal.

Local businesses are important to us, and we are including them in this consultation as well, so that we can listen to their concerns, and ensure any impact of the scheme on their businesses is taken into account moving forward.

What will happen next?

After the consultation, a report will be written with recommendations on the future of the temporary scheme, based on the results of the consultation, balanced with other material considerations. The report will be considered by the Traffic Management Advisory Committee in December, and decisions on the next steps for the Crystal Palace and South Norwood LTN will be made.

How do I get more information?

For further information on our Streetspace programme please visit our website.

www.croydon.gov.uk/streetspace

Street Notices placed on site:

November 2020

PUBLIC CONSULTATION

CROYDON | Delivering
www.croydon.gov.uk | for Croydon

Future of Crystal Palace and South Norwood Low Traffic Neighbourhood

The council is carrying out a public consultation on the temporary Crystal Palace & South Norwood (LTN) scheme implemented earlier this year.

How do I participate?

We are very appreciative to everyone for taking the time to submit feedback. Having listened, we are inviting the public to participate in a consultation on the future of the scheme. You can view the consultation material in full online and submit your response from **6 November 2020** until **4 December 2020** on our dedicated consultation webpage.



The link will go live on our Streetspace webpages available at croydon.gov.uk/streetspace – or through the QR code here:



Who else is being consulted and how will other concerns from the themes be addressed?

We are consulting local ward councillors, schools, emergency services and residents of nearby boroughs, to help inform the decision making process. The range of options available is described on the survey portal.

Local businesses are important to us, and we are including them in this consultation as well, so that we can listen to their concerns, and ensure any impact of the scheme on their businesses is taken into account moving forward.

What will happen next?

After the consultation, a report will be written with recommendations on the future of the temporary scheme, based on the results of the consultation, balanced with other material considerations. The report will be considered by the Traffic Management Advisory Committee in December, and decisions on the next steps for the Crystal Palace and South Norwood LTN will be made.

www.croydon.gov.uk/streetspace

Questions asked as a part of the consultation.

Note, the questionnaire was optimised for web input, paper questionnaires were sent to residents when requested, the format adopted may not match that below.

Consent

1: Can you please confirm:

- I give consent to Croydon Council to share my data between one officer in the Communications and Engagement Team, one officer in the Highways Team and one officer in the Strategic Transport Team
- I understand the council will:
 - keep all data in a secure location only accessible by the above three officers
 - that it will be used only for the purpose of analysing and validating the consultation results on which a report will be based
 - keep all data for a period of up to one year from the close of consultation for the purpose of further analysis and reporting on the results of the consultation, should this be deemed necessary
- I know I have the right to withdraw consent at any time by emailing highwayimprovements@croydon.gov.uk but understand that withdrawing consent may not affect the material that has already been used.

The full Privacy Notice can be viewed [here](#).

* This question must be answered

I give consent to Croydon Council using my data as outlined in the Privacy Notice. []

Section 1: About you

2: If you received a letter with a four-digit code please enter it here.
If you did not receive a letter/code, please enter 0000.

* This question must be answered

3: Do you:

* This question must be answered

Live locally to the scheme []

Travel through the area []

4: My house number / name or flat number is:

* This question must be answered

5: Road name:

* This question must be answered

6: Postcode:

* This question must be answered

7: Which borough do you live in?

* This question must be answered

Croydon []

Bromley []

Lambeth []

Southwark []

Lewisham []

Other []

7.1: Please specify:

8: Have you let us know your feedback on Streetspace before this consultation? If so, by which method (choose all that apply):
Please tick all that apply.

- Yes - online survey response []
- Yes - email []
- No []

Section 2: Feedback on the Low Traffic Neighbourhood

9: How did you feel about the scheme when it was first implemented?
* This question must be answered

- Very positive []
- Positive []
- Neutral []
- Negative []
- Very negative []

10: Please explain your answer:

.....
.....

11 How do you feel about the scheme now?
* This question must be answered

- Very positive []
- Positive []
- Neutral []
- Negative []
- Very negative []

12: Please explain your answer:

.....
.....

13: Has the removal of the scaffolding and temporary lights on Church Road made a difference? If so, in what way?
* This question must be answered

- Very positive []
- Positive []
- Neutral []
- Negative []
- Very negative []

14: Please explain your answer:

.....
.....

15: In July, we made changes to the scheme based on initial feedback - namely installing a bus gate on Auckland Road. How did you feel about the scheme with this change?

* This question must be answered

Very positive []

Positive []

Neutral []

Negative []

Very negative []

16: Please explain your answer:

.....
.....

Section 3: How you travel in and around Crystal Palace

17: What (if anything) stops you from walking and cycling for more journeys in and around Crystal Palace and South Norwood?

Select as many as appropriate.

Please tick all that apply.

Concern about road safety/ road danger []

Traffic speed []

Traffic volume []

Unpleasant street environment []

Topography (hills) []

Disability []

Other []

17.1: Please specify

.....
.....

18: If you own a car or motorbike, do you also walk, cycle or use public transport for journeys?

Yes []

No []

I don't own a car or motorbike []

19: On a scale of 1 to 5, 5 being much more and 1 much less, are you walking, cycling, scooting more now than before the Covid-19 pandemic?

5 - much more []

4 []

3 - about the same []

2 []

1 - much less []

20: If you have children and/or young people in your household, are they walking, cycling, scooting, skating more now than before the Covid-19 pandemic?

5 - much more []

- 4 []
- 3 - about the same []
- 2 []
- 1 - much less []
- No children/young people in household []

21: On a scale of 1 to 5, 5 being much better and 1 much worse, how would you describe the impact on your street since the temporary LTN was put in – including with the bus gate on Auckland Road? Eg. air pollution, noise, etc.

- 5 - much better []
- 4 []
- 3 - no difference []
- 2 []
- 1 - much worse []

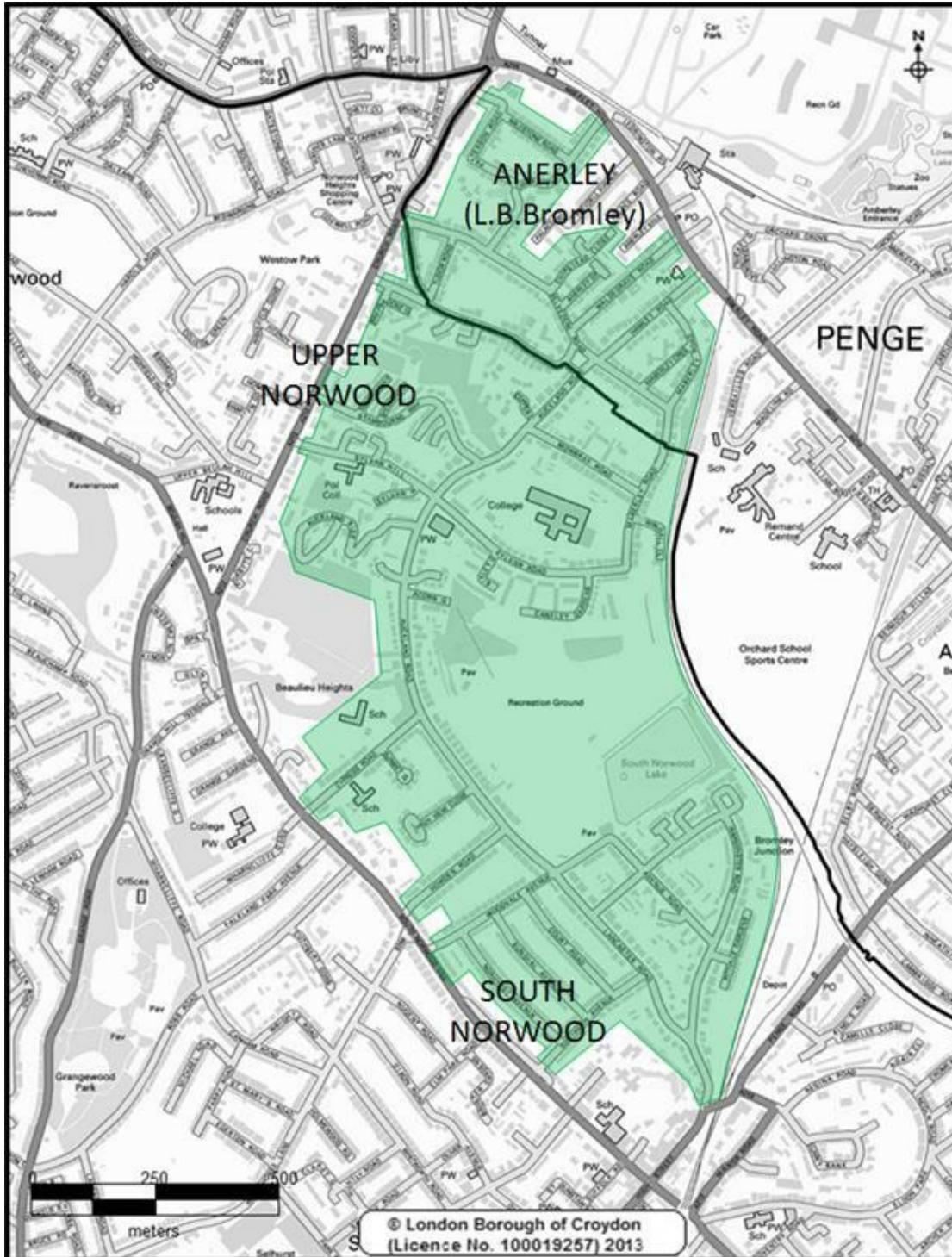
22: How would you describe road safety within your street since the temporary LTN was put in place?

- 5 - much better []
- 4 []
- 3 - no difference []
- 2 []
- 1 - much worse []

23: How are conditions for walking, cycling, and scooting now compared to before the LTN was in place?

- 5 - much better []
- 4 []
- 3 - no difference []
- 2 []
- 1 - much worse []

Section 4: The future of the LTN



- 24: Option 1: Replace: remove all physical planter closures and replace them with five ANPR camera-controlled access points with an exemption for eligible residents. Our definition of “eligible residents” would include those living on certain streets within both Croydon and Bromley’s borough boundaries, see map above. This permit would be free of charge, and would allow those in the exemption permit boundary of the LTN to drive through the closures, as well as the bus gate on Auckland Road. After hearing concerns about access to the Auckland Surgery, we are also proposing the relocation of the bus gate 150 metres, so the surgery can be reached easily from either end of Auckland Road. We will also be providing two additional disabled bays to make access for those with accessibility needs.

* This question must be answered

- Strongly agree []
- Agree []
- Disagree []
- Strongly disagree []
- Don't know []

25: Please explain your answer, including any positive or negative impacts you feel this option could have on you.

.....

.....

26: Option 2: Remain: the LTN will not change in its current format with physical closures to remain in place, except for the changes in Auckland Road as described in option 1.

* This question must be answered

- Strongly agree []
- Agree []
- Disagree []
- Strongly disagree []
- Don't know []

27: Please explain your answer, including any positive or negative impacts you feel this option could have on you.

.....

.....

28: Option 3: Remove: removing the scheme entirely, and by doing so, returning access for all motor traffic including non-residential traffic.

* This question must be answered

- Strongly agree []
- Agree []
- Disagree []
- Strongly disagree []
- Don't know []

29: Please explain your answer, including any positive or negative impacts you feel this option could have on you.

.....

.....

30: If you have any other suggestions for how we could make the area safer, quieter and less polluted, please tell us in the space below?

.....

.....

Equalities questions

31: Which age group are you in?
Under 18 []

- 18-24 []
- 25-34 []
- 35-44 []
- 45-54 []
- 55-64 []
- 65-74 []
- 75+ []
- Prefer not to say []

32: How would you describe your ethnic origin?

- White English / Welsh / Scottish / Northern Irish / British []
 - White Irish []
 - White Gypsy or Irish Traveller []
 - Any other White background []
 - White and Black Caribbean []
 - White and Black African []
 - White and Asian []
- Any other Mixed / multiple ethnic background []
 - Indian []
 - Pakistani []
 - Bangladeshi []
 - Chinese []
 - Any other Asian background []
 - Black African []
 - Black Caribbean []
 - Any other Black background []
 - Arab []
 - Other []
 - Prefer not to say []

32.1: Please Specify

33: The Equality Act 2010 defines someone as a disabled person if they have a physical or mental impairment which has a long term and substantial adverse effect on their ability to carry out normal day to day activities.

A disability may include progressive conditions such as HIV and cancer, mobility, sight or hearing impairments or mental health issues such as depression.

In considering whether you have a disability you should not take into account the effect of any medication or treatments used or adaptations made which reduce the effects of an impairments (other than glasses or contact lenses used to correct a visual impairment):

Do you consider yourself to be disabled?

Please tick all that apply.

- No []
- Yes-Mobility []
- Yes- Visual impairment []

Yes- Hearing impairment []

Yes- Mental health []

Yes-Learning difficulties []

Yes-other []

Prefer not to say []

33.1: Please specify:.....

34: I identify my gender as:

Male []

Female []

Transgender Male []

Transgender Female []

Gender variant/ non-conforming []

Prefer to self-describe []

Prefer not to say []

34.1: Please describe

35: What is your annual household income?

£0 - £9,999 []

£10, 000 - £19,999 []

£20,000 - £34,999 []

£35,000 - £49,999 []

£50,000 - £74,999 []

£75,000 - £99,999 []

£100,000 - £124,999 []

£125,000 or more []

Prefer not to say []

Thank you for completing our survey. If you require further information, please visit our [Streetspace webpages](#).

Open Our Roads leaflet

OPEN **OUR** ROADS

Croydon Council think YOU DON'T MATTER!

The council want to create private roads for a select few residents
AT YOUR EXPENSE.

- Those residents get quiet roads that ONLY THEY can drive on
- YOU get all the diverted traffic and pollution!
- YOU will be paying for THEIR roads that YOU can't use!
- If you drive on THEIR roads, YOU will get fined!



But you know what's even worse?

- The council ONLY sent consultation letters to the residents on these roads!
- They deliberately excluded YOU because they know you won't want this!

Don't let them get away with it!

Take part in Croydon Council's secret consultation. Scan the link – enter code 0000 when prompted.

- ✗ Say NO to road closures – diverting traffic into your area!
- ✗ Say NO to ANPR cameras – private roads for THEM that YOU have to pay for!
- ✓ Say YES to opening the roads (Option 3: Remove) – put things back to how they were



If you can't scan the QR code enter the following address: <https://new.croydon.gov.uk/croydon-streetspace/crystal-palace-and-south-norwood-low-traffic-neighbourhood>

Or you can request a paper copy on 020 8726 7000

Main consultation (non-business) response data set

Data analysis – complete dataset:

Ref	Question	Yes - Online	Yes - Email	No
1	Have you let us know your feedback on Streetspace before this consultation? If so, by which method (choose all that apply):	643	712	3075

Ref	Question	Very Negative	Negative	Neutral	Positive	Very Positive
2	How did you feel about the scheme when it was first implemented?	2325	643	435	291	568
3	How do you feel about the scheme now?	2855	449	90	267	594
4	Has the removal of the scaffolding and temporary lights on Church Road made a difference? If so, in what way?	594	456	1807	823	556
5	In July, we made changes to the scheme based on initial feedback - namely installing a bus gate on Auckland Road. How did you feel about the scheme with this change?	1913	539	1008	387	372

Ref	Question	Yes	No	Don't Own
6	If you own a car or motorbike, do you also walk, cycle or use public transport for journeys?	643	712	3075

Ref	Question	Much Less	Less	About the same	More	Much More	No Children/ Young People
7	On a scale of 1 to 5, 5 being much more and 1 much less, are you walking, cycling, scooting more now than before the Covid-19 pandemic?	662	263	2103	618	508	
8	If you have children and/or young people in your household, are they walking, cycling, scooting, skating more now than before the Covid-19 pandemic?	333	97	1177	240	210	2041
9	On a scale of 1 to 5, 5 being much better and 1 much worse, how would you describe the impact on your street since the temporary LTN was put in – including with the bus gate on Auckland Road? Eg. air pollution, noise, etc.	1997	377	957	259	502	
10	How would you describe road safety within your street since the temporary LTN was put in place?	1452	432	1505	232	460	
11	How are conditions for walking, cycling, and scooting now compared to before the LTN was in place?	1158	397	1582	327	625	

Data Analysis – Inside the LTN

Ref	Question	Yes - Online	Yes - Email	No
1	Have you let us know your feedback on Streetspace before this consultation? If so, by which method (choose all that apply):	112	173	413

Ref	Question	Very Negative	Negative	Neutral	Positive	Very Positive
2	How did you feel about the scheme when it was first implemented?	316	106	65	59	97
3	How do you feel about the scheme now?	352	90	25	74	101
4	Has the removal of the scaffolding and temporary lights on Church Road made a difference? If so, in what way?	88	69	220	142	20
5	In July, we made changes to the scheme based on initial feedback - namely installing a bus gate on Auckland Road. How did you feel about the scheme with this change?	261	82	136	74	86

Ref	Question	Yes	No	Don't Own
6	If you own a car or motorbike, do you also walk, cycle or use public transport for journeys?	468	45	118

Ref	Question	Much Less	Less	About the same	More	Much More	No Children/ Young People
7	On a scale of 1 to 5, 5 being much more and 1 much less, are you walking, cycling, scooting more now	80	40	312	103	98	

	than before the Covid-19 pandemic?						
8	If you have children and/or young people in your household, are they walking, cycling, scooting, skating more now than before the Covid-19 pandemic?	40	9	139	33	37	213
9	On a scale of 1 to 5, 5 being much better and 1 much worse, how would you describe the impact on your street since the temporary LTN was put in – including with the bus gate on Auckland Road? Eg. air pollution, noise, etc.	268	54	122	62	154	
10	How would you describe road safety within your street since the temporary LTN was put in place?	212	57	164	60	145	
11	How are conditions for walking, cycling, and scooting now compared to before the LTN was in place?	148	33	190	63	127	

OPEN OUR ROADS

The negative impacts of the Crystal Palace and South Norwood LTN

Briefing note for all Croydon Councillors

Purpose

We are briefing you about the negative impacts of the Council's Low Traffic Neighbourhood (LTN) scheme in the Crystal Palace and South Norwood wards which affect the health, safety and well-being of residents and visitors while decreasing the economic potential and development of the town centre. It's a controversial traffic scheme that has attracted opposition with over 6000 people from a cross-section of the local community having signed numerous petitions asking for the roads to be reopened, and a well-attended protest in Crystal Palace in November.

What is an LTN?

LTNs have been promoted as a way to encourage more people to walk and cycle, called active travel, while discouraging unnecessary car journeys. The objective is to decrease congestion and lower pollution. The Council's stated purpose of this LTN was to respond to the Covid-19 pandemic as a way to provide socially distanced active travel.

The issue

The Crystal Palace and South Norwood LTN was implemented without any baseline evidence or traffic modelling; no stakeholder consultations, including none of those with protected characteristics or emergency services; and no regard for the Council's statutory duties as a traffic authority.

Due to the lack of strategic planning and characteristics of the area, the LTN has had the opposite effect of its stated aims. It has:

- Increased congestion by diverting traffic onto main roads, including strategic A roads that were already at saturation point;
- Diverted traffic onto other residential roads that are ill-equipped to handle these traffic volumes – including roads in the neighbouring London Borough of Bromley, which was not consulted before the LTN was implemented;
- Increased pollution on main roads, some of which were already over the legal limits of pollutants, and so endangers the health of children whose schools are located on these roads, residents who live on these roads as well as pedestrians and cyclists who use these roads;
- Created delays in response times to emergency services, which we fear has the potential to lead to a preventable loss of life;
- Prevented vulnerable residents from accessing essential services, such as care visits and medical care;
- Disproportionately impacted the quality of life for BAME communities who live outside the LTN.

Our view is that Croydon Council's LTN in Crystal Palace and South Norwood ward is:

- **Illegal** due to non-compliance with Road Traffic Act legislation, part of Judicial Review;
- **Discriminatory** due to the environmental apartheid it inflicts on majority ethnic minority areas;
- Creates **health injustice** by increasing pollution above dangerous levels on main roads;
- **Worsens** the climate crisis whilst also being **economically wasteful**;
- **Ineffective** at increasing cycling – and there are less disruptive ways to achieve that goal;
- Fails to achieve most of TfL's criteria for an LTN, instead it **creates more dangerous roads**;
- Causes **significant harm** to businesses, amenity and quality of life around shopping areas;
- **We call upon Croydon Council to remove the scheme completely.**

Background

Between 2 May and 3 August 2020, the London Borough of Croydon (LBC) used Covid-19 amendments to the Road Traffic Regulation Act (RTRA) to close six roads, restricting vehicular access around Crystal Palace and South Norwood, calling it a Low Traffic Neighbourhood. The stated purpose was to encourage active travel while ensuring social distancing during the pandemic.

The roads around Crystal Palace's Triangle town centre and South Norwood have been consistently busier and more congested since the scheme was introduced, even during the second national lockdown.

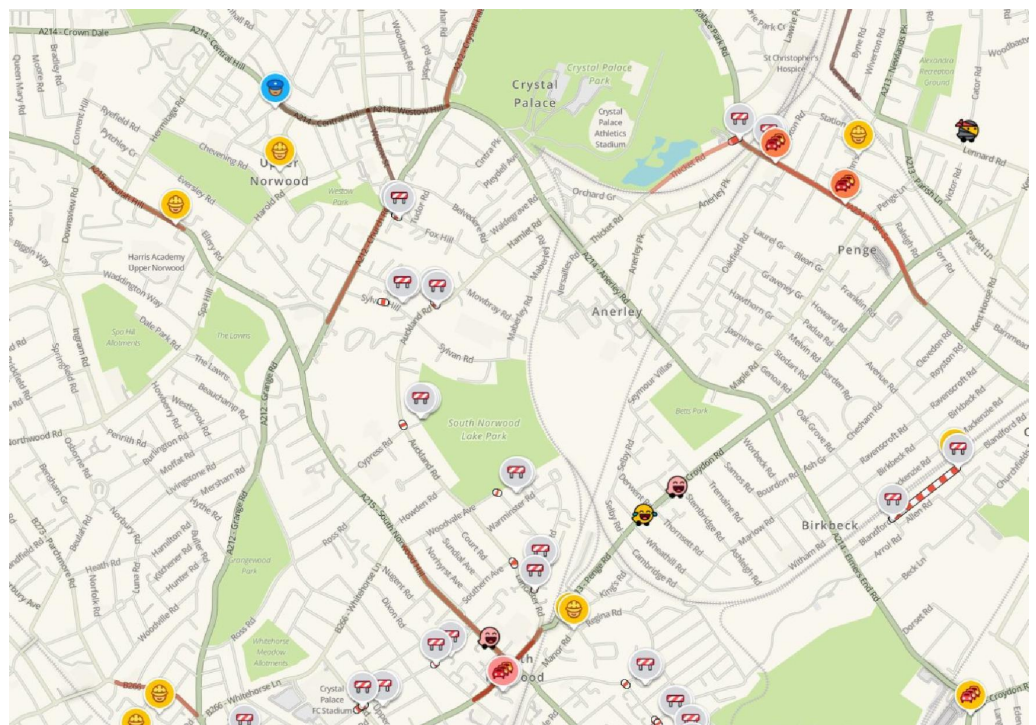
The council had claimed this increased congestion was caused by scaffolding that was obstructing one side of one road leading into the Triangle (Church Road). However, the scaffolding was removed in early November, and the problems have persisted due to effects of the LTN.

The locality

Crystal Palace sits on the northern edge of Croydon at the top of a natural hill and is the meeting point of five London Boroughs (Croydon, Bromley, Lewisham, Southwark and Lambeth). Due to the local geography and topography, the area's main roads, which are part of the Strategic Road Network, funnel traffic into a meeting point at Crystal Palace, making it act as a central hub connecting each of the neighbouring boroughs.

The shopping streets are locally known as the Triangle, the three sides being Westow Street, Westow Hill and Church Road. The shopping area is vibrant, with many thriving independent businesses. These attract trade and visitors from outside the area to shop, socialise, eat out, enjoy the food market, watch a movie, visit the antique shops, and stroll round the famous and unique Crystal Palace Park with its Victorian dinosaurs.

It is key to understanding the issues to note that all of the A roads are heavily populated residential areas with schools, nurseries, homes for the elderly, entrances to parks, shopping areas, libraries and a main bus terminus.



The cause of the problem

Sitting just off from the Triangle along Church Road are 3 side turnings: hill roads called Fox Hill, Stambourne Way and Sylvan Hill (all unclassified roads). These roads lead from Church Road to Auckland Road (a classified C road that crosses two boroughs and two postcodes) and the LTN closed these to motor vehicles on 3 August 2020. Auckland Road, together with Warminster Road and Southern Avenue had already been closed off to traffic by the Council since the first lockdown.

These roads all formed part of a network of roads that connected communities and at key times served as filter roads. For most of the day these side roads were quiet and without significant traffic. The impact of the closures has been catastrophic to the surrounding neighbourhoods.

The Triangle shopping area sitting on the Northern boundary of the LTN scheme has become the only route for a significant proportion of traffic that has been displaced by the road closures.

To the South and West, the boundaries of the LTN are formed by the main A roads in South Norwood – the A215 and A213. These roads converge at a narrow road junction on South Norwood High Street, at the centre of a local shopping area. This 4-way junction is a notorious bottleneck because its narrow road layout leads to frequent blockages when any vehicle is waiting to turn right, blocked by oncoming traffic. This is why many cars previously, very sensibly used Lancaster Road and Southern Avenue to bypass this junction.

These roads are now closed, funnelling further traffic through South Norwood Hill and the High Street.

The harmful consequences of the LTN

The closed area is an enormous 2.4km x 0.85km - and this blocked off 2km² area effectively traps some c.5,000 households with no easy vehicular access. There are no shops or amenities in the closed streets, so for some the walk from their house to the shops would take c.35 minutes and involve a 1:20 hill climb.

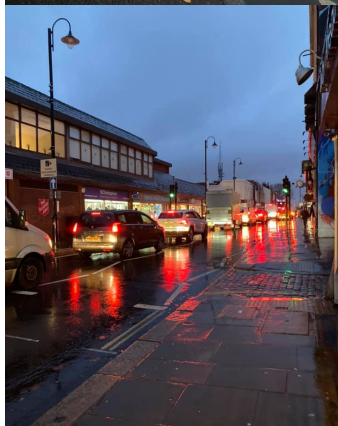
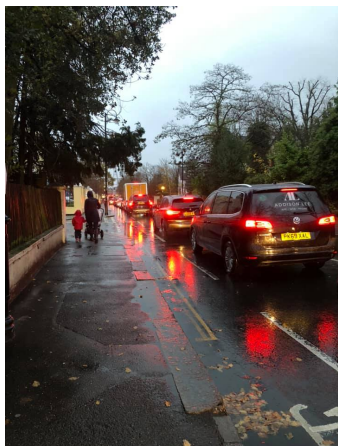
It is our experience that most people do not make short unnecessary journeys: the assumption that short car journeys are luxuries to be foregone is highly contestable. For carers, tradespersons, the elderly, women juggling childcare and work and others, car use is vital, not just a lifestyle choice.

The net effect of the closures has been to push an estimated daily 6000 – 10,000 additional vehicles onto the main A roads in Crystal Palace that as per TfL data were already at capacity levels.

Most drivers are now forced into the Triangle resulting in regular congestion or gridlock with queues of vehicles and stop-start traffic, leading to more harmful pollution; most journey times are now longer, using more fuel and therefore adding more pollution.

This all happens at precisely the times these roads are busiest with other road users: parents walking children to school, commuters attempting to get to work, be that cycling, walking, or waiting at bus stops. Crossing the road is much more dangerous; social distancing on these roads is now impossible; and because of limited road space more cyclists are using the pavement.

The additional congestion on main roads causes delays to emergency vehicles, increasing the risk of harm and potential risk to life.

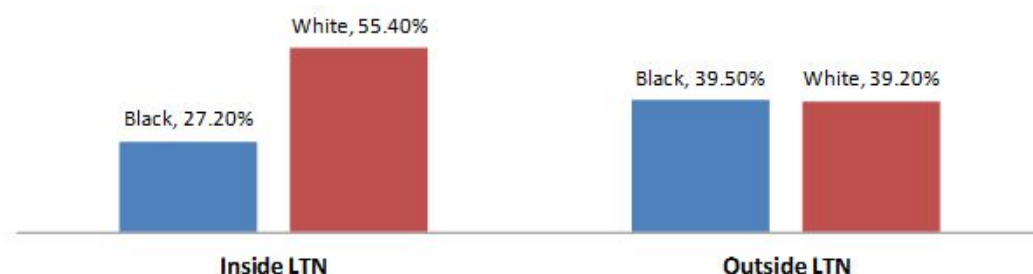


There are severe delays to buses, making public transport a less attractive option for many.

Further, in the event of minor or major road incidents in the area or adjoining areas (e.g. accidents, burst water mains, floods) those roads are now completely gridlocked for hours when such incidents occur.

The junction on South Norwood High Street has been overwhelmed by traffic that has been diverted by the road closures, leading to very long queues on both of the A roads on the boundary of the LTN. These A roads pass next to Harris Academy South Norwood on two sides, where children’s play areas are located, and these are the same roads that children must use to walk to and from the school. The LTN is therefore exposing children to increased air pollution.

The ethnic and equality issues are of serious and immediate concern:



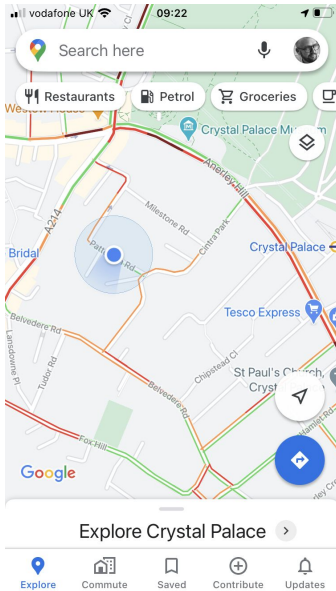
Specifically, Councillors Stephen Mann, Nina Degrad, Pat Ryan, Clive Fraser, Patsy Cummings, Jane Avis, Pat Clouder, Karen Jewitt, Callton Young in whose wards these pollution ghettos are being created, must reject all forms of discrimination and stand-up for these protected groups.

This scheme harms and further reduces life expectancy for disadvantaged people for the benefit of the LTN residents.

- Traffic has been diverted to areas with a significantly higher proportion of Black residents at 39%, compared to 27% in the LTN, which is 55% white (see Appendices [Ai\) Population inside the LTN](#) & [Aii: Population bordering the LTN](#));
- Black males living in South Norwood and Selhurst already have a shorter life expectancy than other parts of Croydon – and 10 years less than anywhere else in the UK (see [Appendix B: ONS reported statistic](#));
- The main roads and areas traffic has been displaced to are home to some of the least well-off residents and deprived parts of LBC (see [Appendix C: Deprivation](#)).

Increasing pollution, congestion and further worsening these areas’ quality of life is not only morally unacceptable but the LTN as implemented is discriminatory. The current situation has created a dangerous and polluted environment for anyone using or living on the main ‘A’ roads and respiratory difficulties are exacerbated in areas of high pollution (see [Appendix D: Pollution](#)).

An equally distressing effect of the closures has been the displacement of traffic through a cluster of formerly quiet, narrow, winding, residential roads that sit nestled in the corner of the London Borough of Bromley (LBB) that were astonishingly advertised by LBC as alternative routes (Belvedere Road, Cintra Park, Patterson Road and Milestone Road). These roads are wholly unsuitable to take the additional traffic because of their narrow width and curves, and this leads to queuing traffic and the associated pollution problems that brings. The diverted traffic has also caused multiple road rage incidents in this residential neighbourhood, some of which were close to escalating into violence, and this has now become a public safety issue. All these issues have severely impacted these residents' quality of life.



“Yet again all my clients late for appointments. Madness, just pissing me off.”

BUSINESS OWNER, WESTOW STREET, 14:54 06 DEC 2020

Local businesses in Crystal Palace report that the road closures have had a direct impact on trade (from footfall, appointment data and customer feedback). This is partly due to some customers finding it less convenient to travel to Crystal Palace, and partly due to some avoiding the area because the increased vehicular pollution makes for an unpleasant shopping environment. Both of these problems have been directly caused by the road closures.

Flawed LTN rationale

The official reason given for the road closures was Covid-19 related, to make the roads within the LTN safer for social distancing and to encourage cycling and exercising but those who live in the area are baffled by this.

- The area is blessed with parks, woods, lakes (approximately 30% of the area is covered in public green spaces);
- The topography (hill roads with approx.1:20 inclines) can make walking or cycling to Church Road quite challenging for many people;
- The roads have generously sized pavements for walking with social distancing;
- The roads were already safe for cycling (data shows no cycling incidents on any of the hill roads and only two minor incidents on Auckland Road during the previous four years);
- The roads where most pedestrians are at risk (shopping, waiting at bus stops, taking children to school) are the main roads where all the additional traffic has been diverted.

“So angry. I have had some really bad health issues in the last two and a half weeks. I have had to call an ambulance out to help me three times. All three ambulances have been held up or got stuck trying to get to me. I have asked today's one to please complain about these road closures as this is dangerous to people like me who need help.”

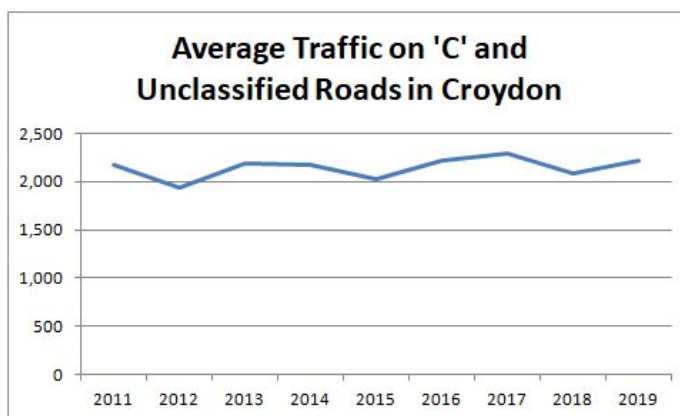
LTN resident, Dec 2020

We have seen no verifiable data that shows clear rationale as to why these roads were selected to be closed off. We believe this decision has been strongly influenced by the London Cycling Campaign who have lobbied for years to close Auckland Road to motor traffic. The closures of the vital hill roads were merely to protect Auckland Road for essentially the exclusive use of cyclists.

No baseline data was gathered around the area before implementation of the scheme against which to measure success or failure. It is our view that this must be a prerequisite of any major traffic scheme and that the Council should remove the roadblocks and undertake proper modelling assessments that go beyond a desktop exercise.

Some campaigners have presented unverified data using January 2013 as a baseline to show an increase in traffic volumes within the LTN. This data must be ignored as in January 2013 it snowed heavily and settled, forcing schools and public transport to close. Traffic volumes would have been artificially suppressed by the snow (see [Appendix E: Weather](#)).

In fact, official [DfT statistics](#) for one of the roads in the LTN show no increase over the last decade. This is a [trend](#) mirrored across all C and unclassified roads in the Borough of Croydon that were monitored by DfT over the last decade and thus there is no evidence of any traffic increase within the LTN during this time.



SOURCE: DEPARTMENT FOR TRANSPORT

The increase in the types of vehicles using our road network are borne out by market trends and TfL data analysis. Amazon sales in the UK have increased +69 percent between 2019 v 2014-18 as an average, while online grocery shopping has increased to 30 percent from 27.8 percent as a total of grocery shopping between 2019 v 2014-18 as an average. The online grocery market value doubled from the past six years.

TfL has recorded a 10 percent rise in the number of vans crossing its counting cordons. By the same measure, HGV flows have risen by 2 percent; and cars increased by 1 percent (Source: [TfL Travel in London Report 13](#)).

We have seen no evidence that would support the myth of ‘traffic evaporation’ on roads bordering and outside the LTN. Using the data from the much cited Cairns report on traffic evaporation, we’ve calculated an average increase in traffic on surrounding roads of up to 7 percent.

We’ve seen no evidence that the LTNs have decreased pollution. Conversely, traffic has worsened dramatically on already saturated roads, and pollution has increased from standing idling vehicles. This is occurring on roads, such as Church Road (A212), that Croydon Council’s own records show were already above the legal limits for pollution (See [Appendix F: Church Road air quality](#)) We have firsthand witness statements from long-term local residents and traders saying the level of traffic and gridlock now on the A roads around Crystal Palace and South Norwood is unprecedented.

We have seen no evidence, in the months that Auckland Road has been closed, of any significant increase in cycling. Any benefits that may accrue to a small number of cyclists are vastly outweighed by the huge economic, environmental and well-being cost paid by thousands of residents, road users and businesses.

In conclusion

We urge Croydon Council remove the scheme and conduct a full and proper independent traffic survey based on industry best practice, ensure robust and continuous pollution monitoring on the surrounding residential main roads, and work towards a local traffic management plan that is fair, just and works for everyone.

Thank you

openourroadsnow@gmail.com

OPEN OUR ROADS

The LTN's impact on congestion

**A data supplement for TMAC based on
TfL's record of local bus journey times**

December 2020

**TFL
ENDORSEMENT**

The use of bus journey data for monitoring congestion is actively endorsed and utilised by TfL. **Andrew Miles, Consultation Specialist at TfL**, confirmed that this is one of the two data sources TfL will be using to monitor traffic in the area due to its efficacy. He said: ***“There are no bus lanes locally to limit the effects of any congestion on buses, so bus performance data also provides a good and reliable indicator of conditions for general traffic in the area”.***

Purpose

This briefing is to inform you, as members of Croydon Council’s Traffic Management Advisory Committee, of new data measuring the increase in congestion caused by Croydon Council’s Low Traffic Neighbourhood (LTN) scheme in Crystal Palace and South Norwood.

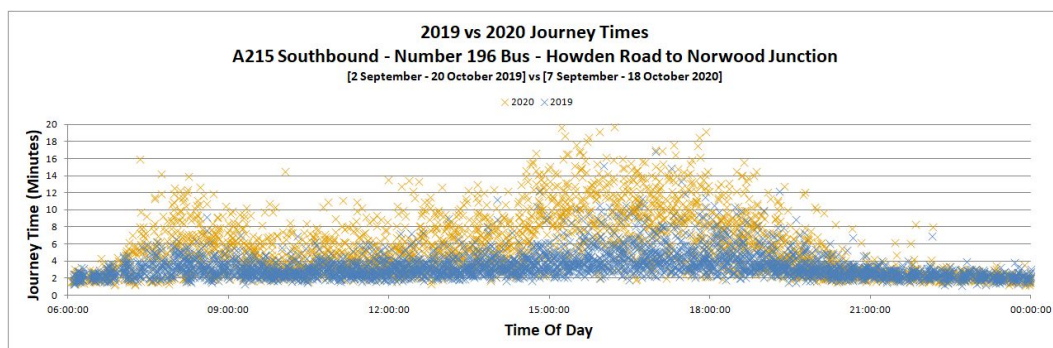
Until now, it was not possible to measure this impact of the scheme upon the main ‘A’ roads around the boundary of the LTN. This was because the Council did not take baseline traffic data prior to introducing the scheme during the Covid pandemic.

However, TfL bus journey tracking data, one of the only reliable sources, allows a comparison of traffic levels seen after the Council’s implementation of the LTN to 2019 traffic levels. This allows us to see the increase of traffic congestion through public transport journey times, providing a very sobering insight into the impact of the LTN.

We urge you to consider this information very carefully as you make your decision on the future of the scheme.

What you’ll find in this document

The TfL bus journey time data has been turned into a visualisation so you can see the difference between 2019 and 2020. Links to the original data have been included, so you can drill down into the data for yourself. The visualisations look like the one below, which depict the the 196 bus times between two stops.



“Ella died of asthma contributed to by exposure to excessive air pollution... The whole of Ella’s life was lived in close proximity to highly polluting roads. I have no difficulty in concluding that her personal exposure to nitrogen dioxide and PM was very high.”

Dr Philp Barlow
Coroner, Southwark
Coroner’s Court

Implications of increased congestion on main roads

Whilst the transport sector does not contribute as much to greenhouse gas emissions and dangerous air pollution as other sectors, like industrial manufacturing, we know that road vehicle emissions can be more harmful to human health, as they occur in areas where people live and work. This includes the main roads in the London Borough of Croydon that are absorbing the displaced traffic from the LTN.

In the following pages, we have calculated the potential increase in CO2 emissions based on increased journey times. However, the real concern is the increase in harmful pollutants such as those cited in a landmark hearing [linking the death of Ella Kissi-Debrah to NOx](#). Ella lived on the South Circular in Lewisham, just 6 miles from North Croydon.

Diesel vehicles - including buses - produce more of these harmful pollutants - nitrogen oxides (NO2, NOx) and particulate matter (PM) - than petrol or electric vehicles.

As it’s not possible to know the number of diesel vs petrol vs electric vehicles on the following roads, we have limited our calculations to CO2. However, it is reasonable to expect the same increase in these harmful pollutants with the increased congestion caused by the LTN, exposing those living, working and travelling by the main roads to dangerous conditions.

Executive summary

The TfL data reveals **severe delays to bus journeys in South Norwood** since the introduction of the LTN.

The Number 75 bus from Penge into South Norwood:

- consistently takes 15 – 20 minutes longer during the morning peak compared with the 2019 baseline;
- takes 5 – 10 minutes longer during the evening peak;
- 3 – 5 minutes longer throughout the majority of the day.

At 08:04, the 75 bus from Lewisham should take 1h13m to reach Fairfield Halls. From Anerley Road it normally takes 30 minutes. A 20 minute delay to that would nearly double the journey time to Croydon.

All road users of the A213 – not just buses – are suffering these same delays due to traffic congestion. [DfT traffic counts](#) show this road on average is used by 17,000 vehicles every day. Even with a very conservative estimate, it is highly likely that thousands of vehicles per day are being delayed by an average of 10 minutes due to the LTN.

Consider the additional pollution and CO2 emissions this must be causing due to all the additional engine idling and start-stop movements: If 5,000 cars are idling for 10 minutes, consuming a typical 0.25 litres of fuel per hour, they will produce half a tonne of CO2 in that time.

That would translate into **more than 100 tonnes of additional CO2 per year caused by this aspect of the LTN alone**, and this may be a significant under-estimate of the true figure. [Start-and-stop movements](#) will only add to this so the true figure could be multiple times higher.

That's without even considering the longer routes that some traffic has to take on diversion around the closed roads. This is all in addition to the social, economic and mental health cost on all bus passengers and motorists caught in this traffic.

The A215 on South Norwood Hill is a similar story, told by the journeys of the Number 196 bus. Throughout the entire day, journeys consistently take **4 – 8 minutes longer** compared with the 2019 baseline. [DfT traffic counts](#) are similarly around 17,000 vehicles per day on average. Many thousands of vehicles are therefore stuck in traffic for 4 – 8 minutes

longer per day as a result of the LTN. That could easily translate into **another 50 tonnes of CO2 per year from this aspect of the LTN** on this particular road alone.

Data is not yet available for Crystal Palace Church Road after the removal of the scaffolding on 1st November. We will share this data when available. In the meantime, the effect of the widely-reported traffic congestion in Crystal Palace is clear to see in the delays experienced by bus route 157 via Anerley Hill (A214).

A NOTE ON THE CRYSTAL PALACE SCAFFOLDING

The primary focus of this report is on South Norwood. It is highly unlikely that the traffic in South Norwood was affected by the Crystal Palace scaffolding in any significant way, since these are very distinct routes.

The data

TfL’s IBus system automatically tracks each bus as it makes each journey. The arrival time at each bus stop is recorded in a database for future reference. We obtained the data for a 7-week period in September and October 2020, and the corresponding period of 2019. These dates were selected as they were after Covid restrictions had eased, prior to the second national lockdown and while schools were open.

Covid-19 effects

Due to the unusual conditions of pandemic, the [DfT is recording](#) lower levels of all vehicles on roads in the UK compared to pre-pandemic levels. The data in this report provides the current best available prediction of the impact, but the true impact is likely to be even higher if traffic levels return to pre-pandemic levels after everyday life normalises.

Methodology

We selected two bus stops on each route to measure the traffic conditions between those two points in the area surrounding the LTN. We calculated the journey time between these two bus stops by subtracting the two arrival times. We visualised this data as a chart which shows the duration of each journey at the time it occurred, as a point on a two-dimensional scatter graph. We repeated this for both years, and then compared the results.

Interpreting the charts

When viewing the charts, the height of each point represents the journey duration. The higher the point: the longer the journey. The vertical gap between the 2019 data points and the 2020 data points indicates how much longer journeys are taking compared with last year.

These increased journey times are an indication of increased traffic delays - on average - on these routes. We do not see any significant changes to the bus schedules in the past year that would account for any of the delays. Based on the magnitude of the delays, and how well they correlate with peak traffic times, there can be no doubt that increased traffic congestion due to the LTN is the primary cause.

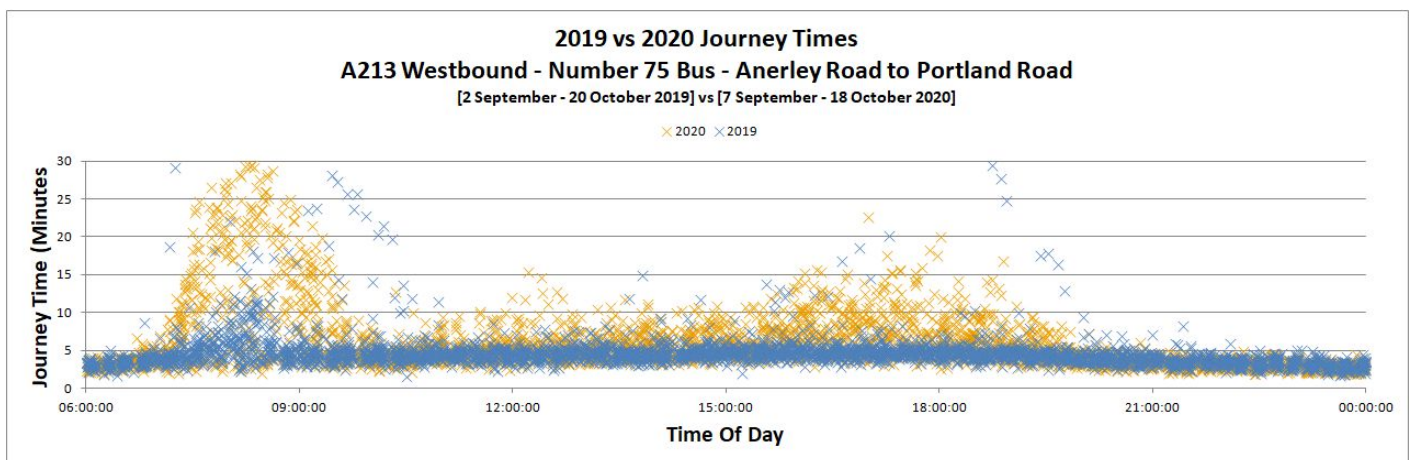
Number 75 - A213 Westbound into South Norwood

The route

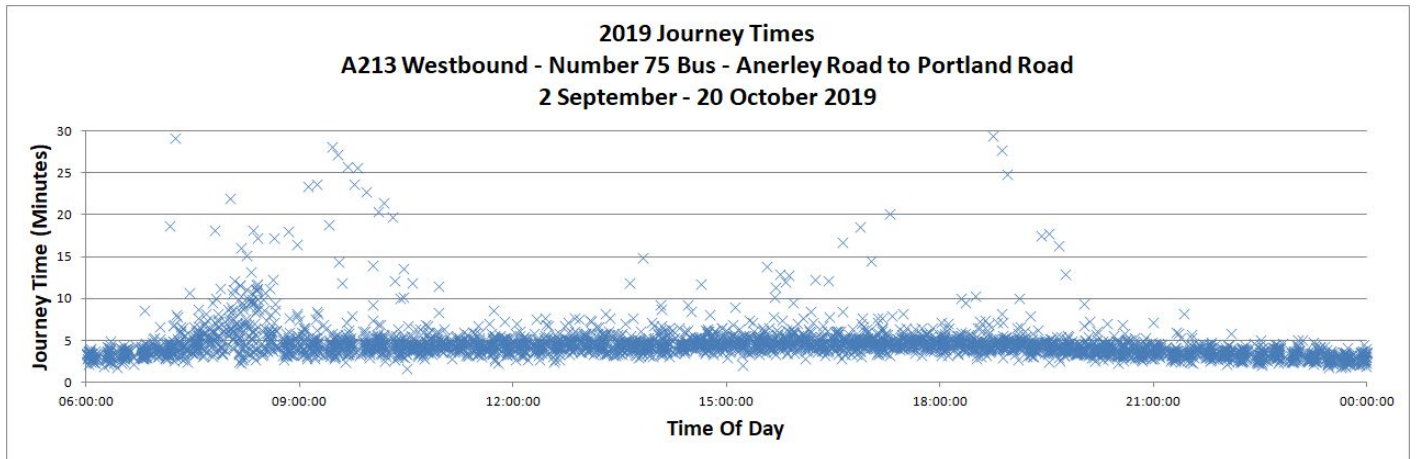
- ✓ Not impacted by the Crystal Palace Scaffolding
- ✓ Impacted by Crystal Palace and South Norwood LTN road closures



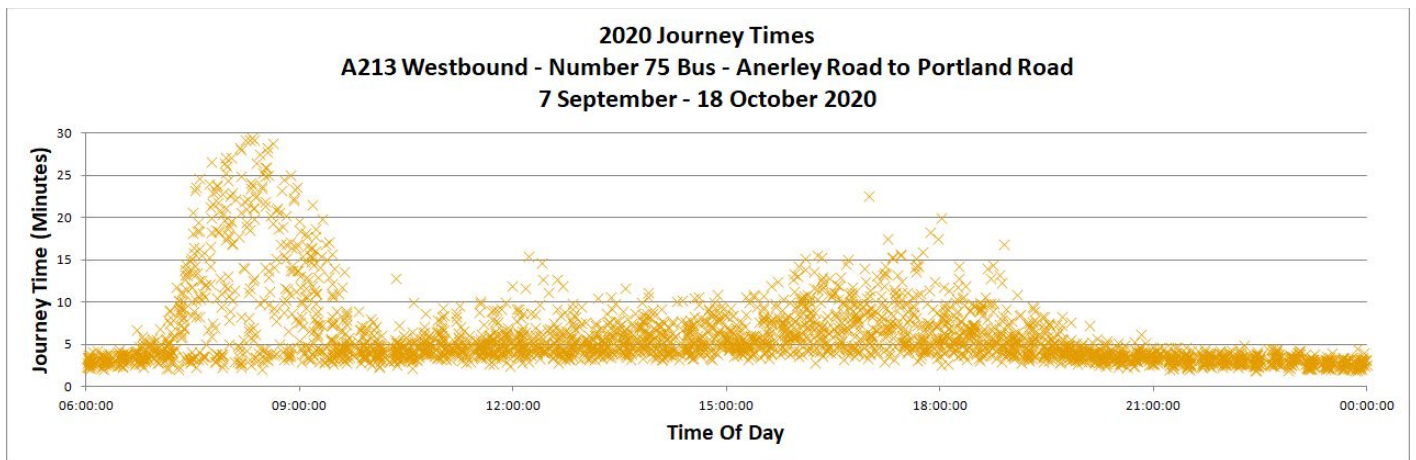
Before and after the LTN



Before the LTN



After the LTN



SOURCE: [TfL IBus journey time data](#)

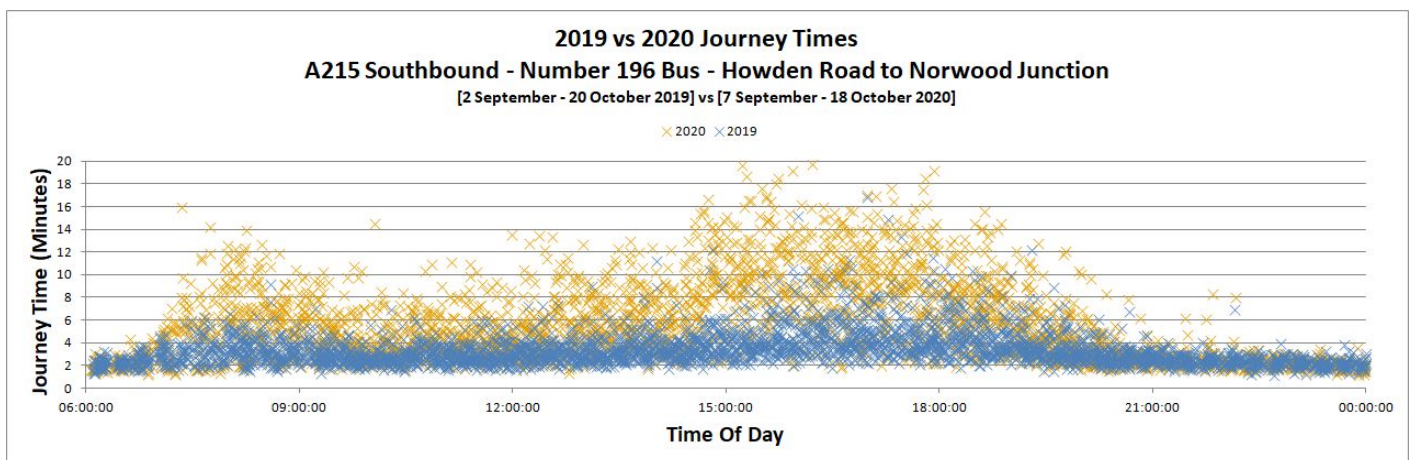
Number 196 - A215 Southbound into South Norwood

The route

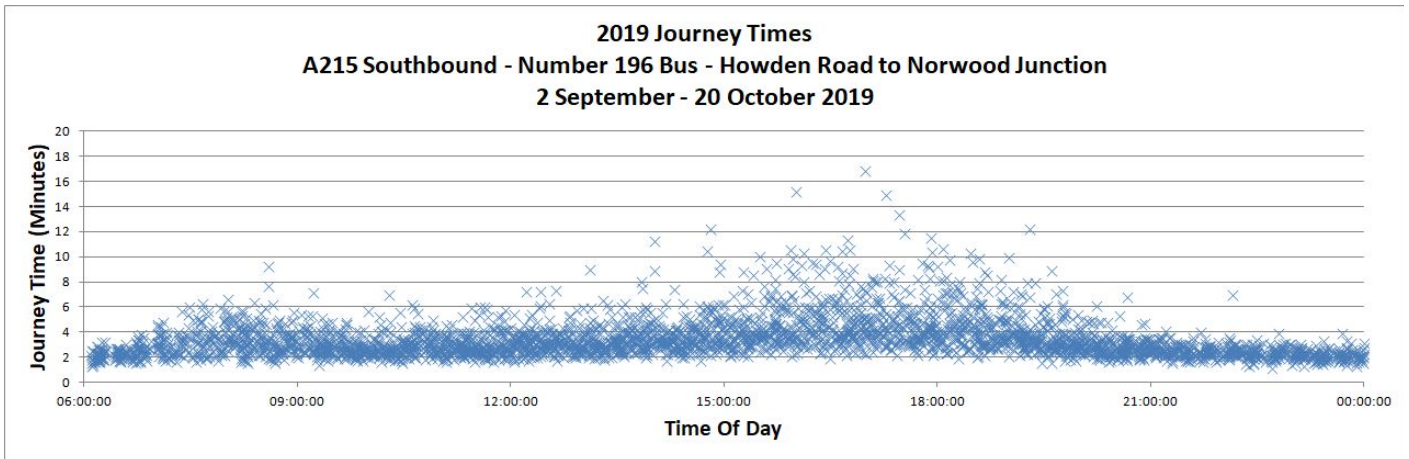
- ✓ Not impacted by the Crystal Palace Scaffolding
- ✓ Impacted by Crystal Palace and South Norwood LTN road closures



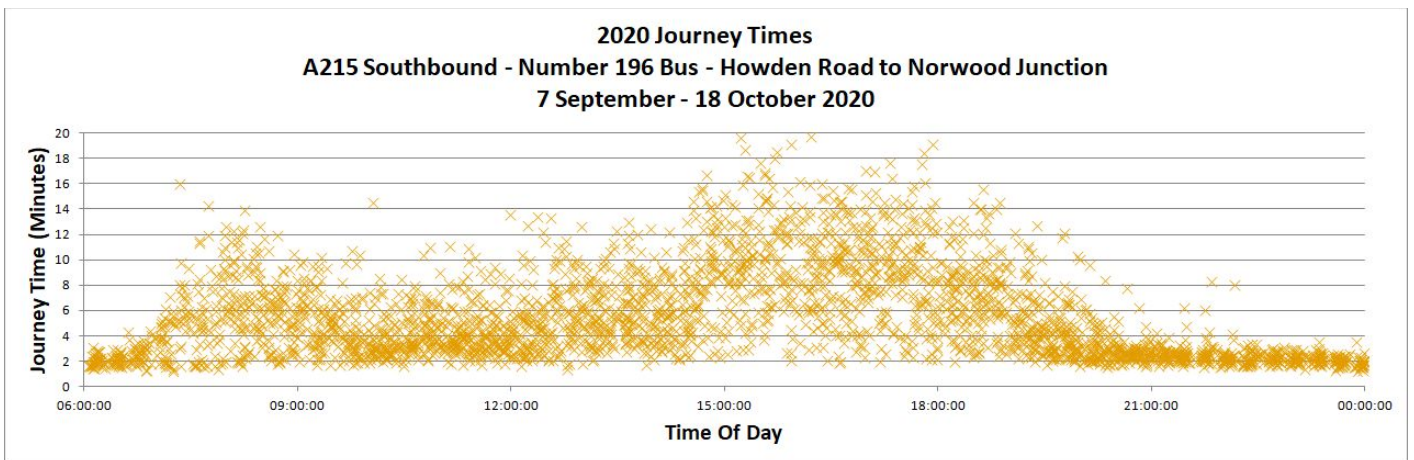
Before and after the LTN



Before the LTN



After the LTN



SOURCE: [TfL IBus journey time data](#)

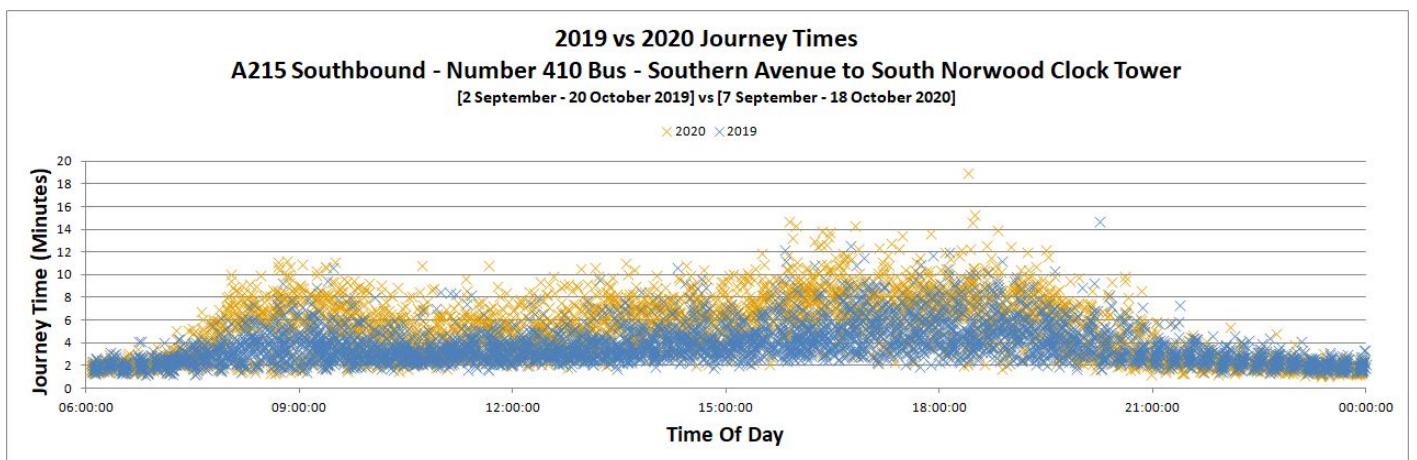
Number 410 - A215 Southbound into South Norwood

The route

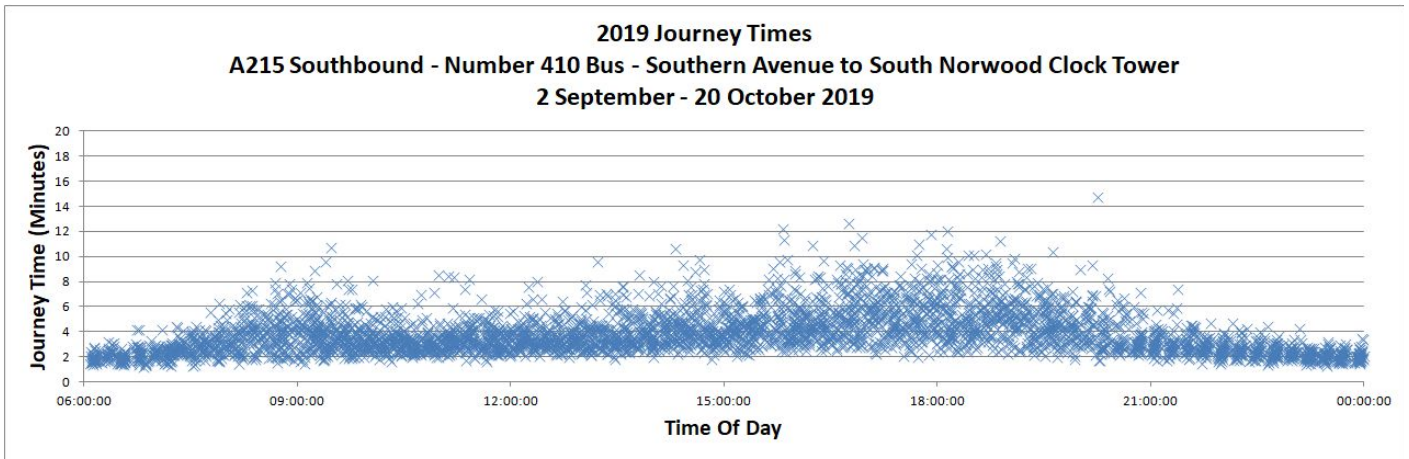
- ✓ Not impacted by the Crystal Palace Scaffolding
- ✓ Impacted by Crystal Palace and South Norwood LTN road closures



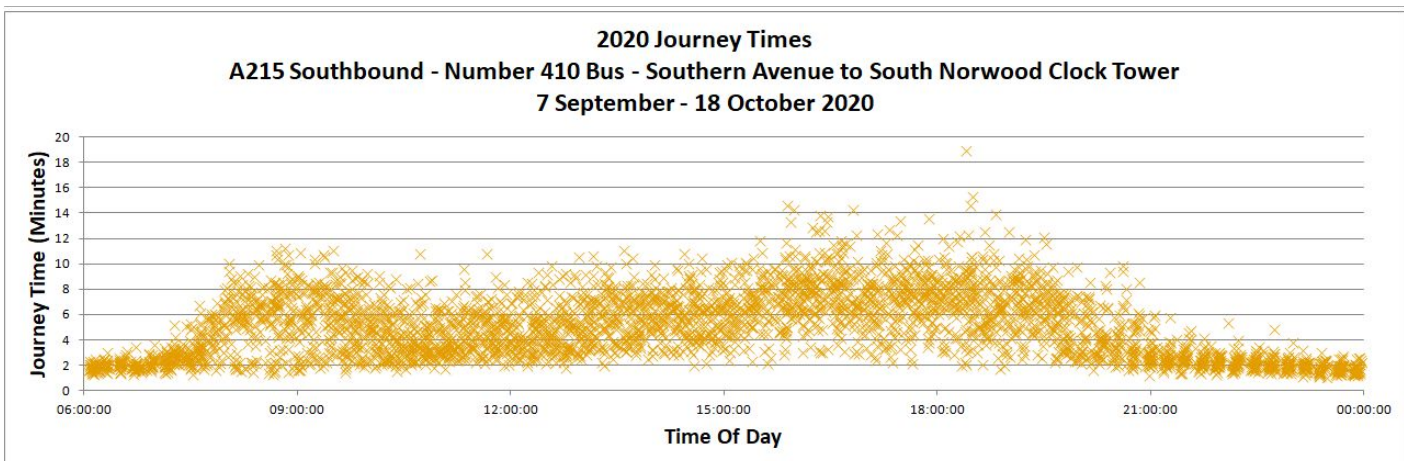
Before and after the LTN



Before the LTN



After the LTN



SOURCE: [TfL IBus journey time data](#)

Number 75 - A213 Southbound into South Norwood

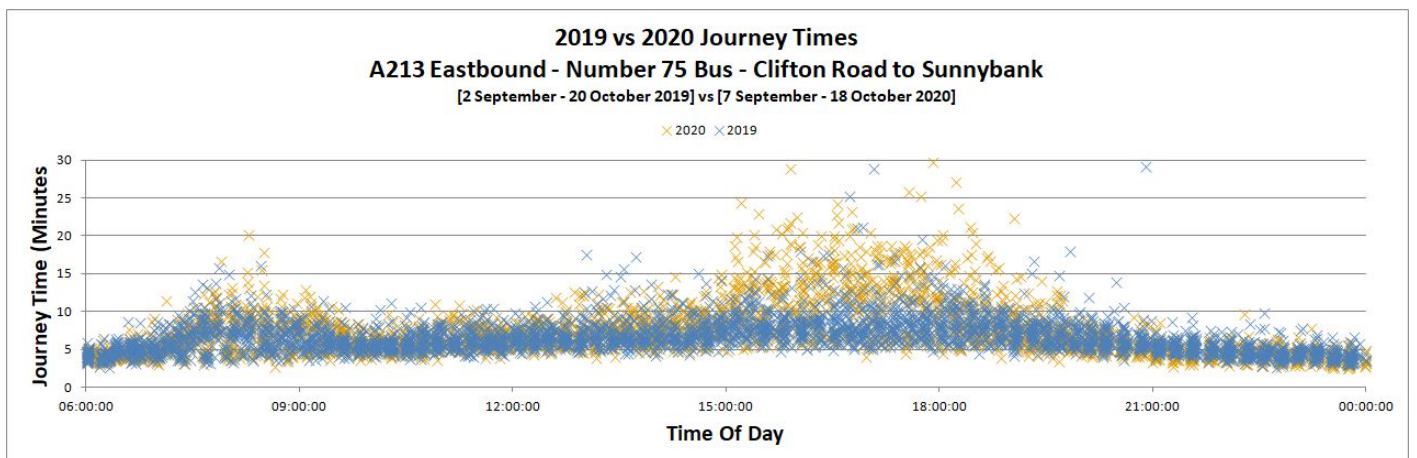
The route

✓ Not impacted by the Crystal Palace Scaffolding

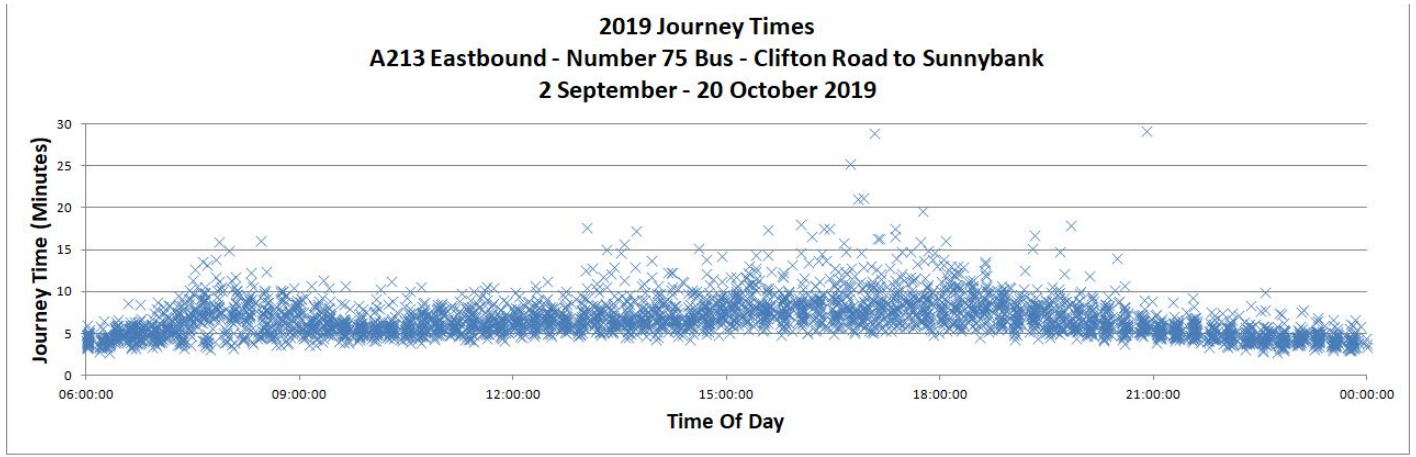
⚠ Likely impacted by the Holmesdale Road closures



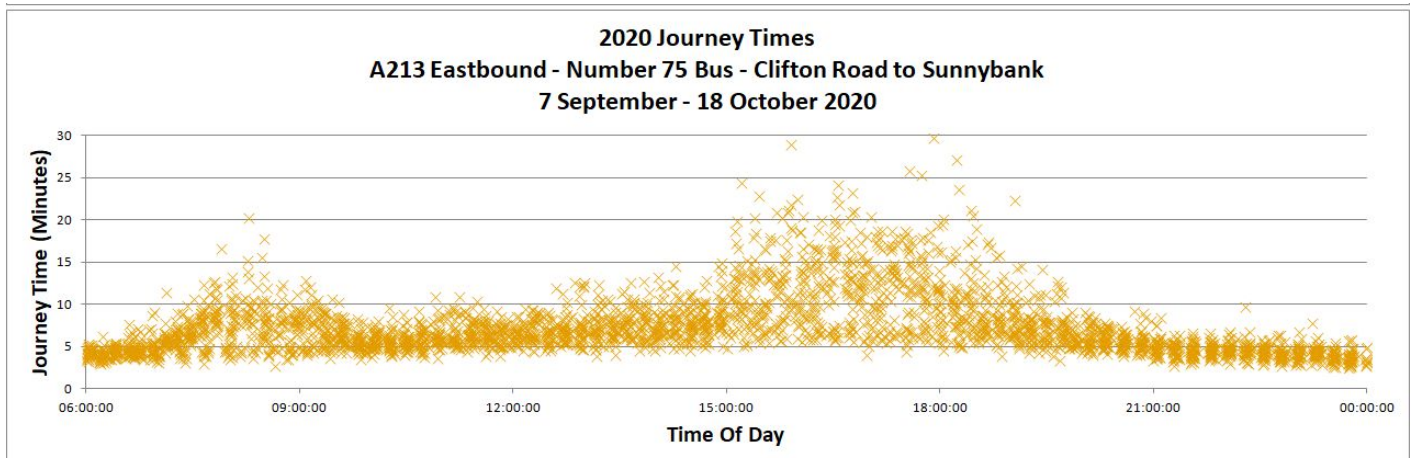
Before and after the LTN



Before the LTN





After the LTN



SOURCE: [TfL IBus journey time data](#)

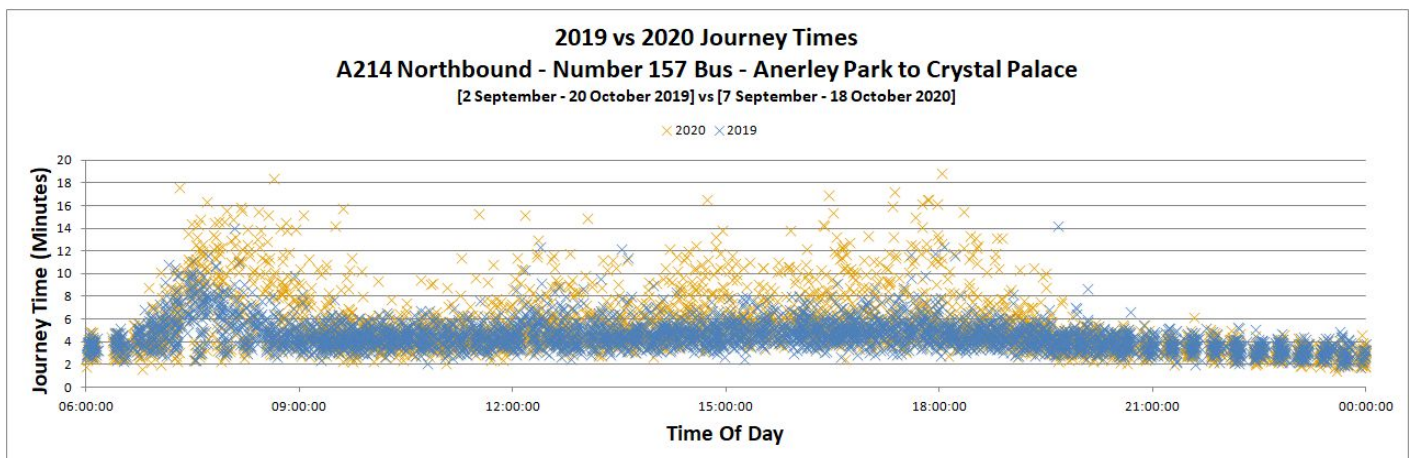
Number 157 - A214 Northbound into Crystal Palace

The route

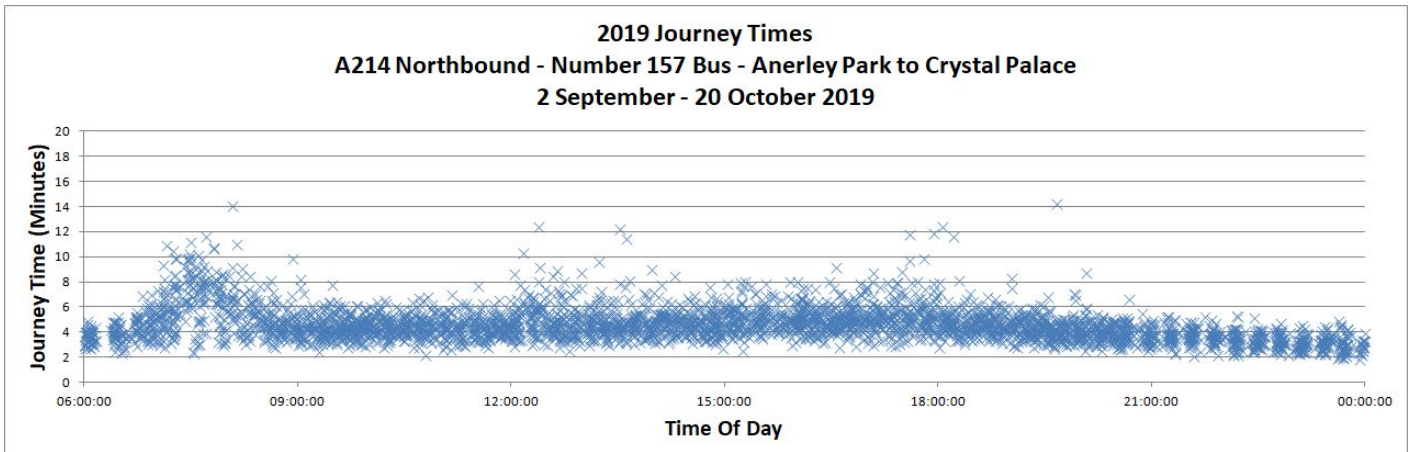
-  Potentially impacted by the Crystal Palace Scaffolding
-  Impacted by Crystal Palace and South Norwood LTN road closures



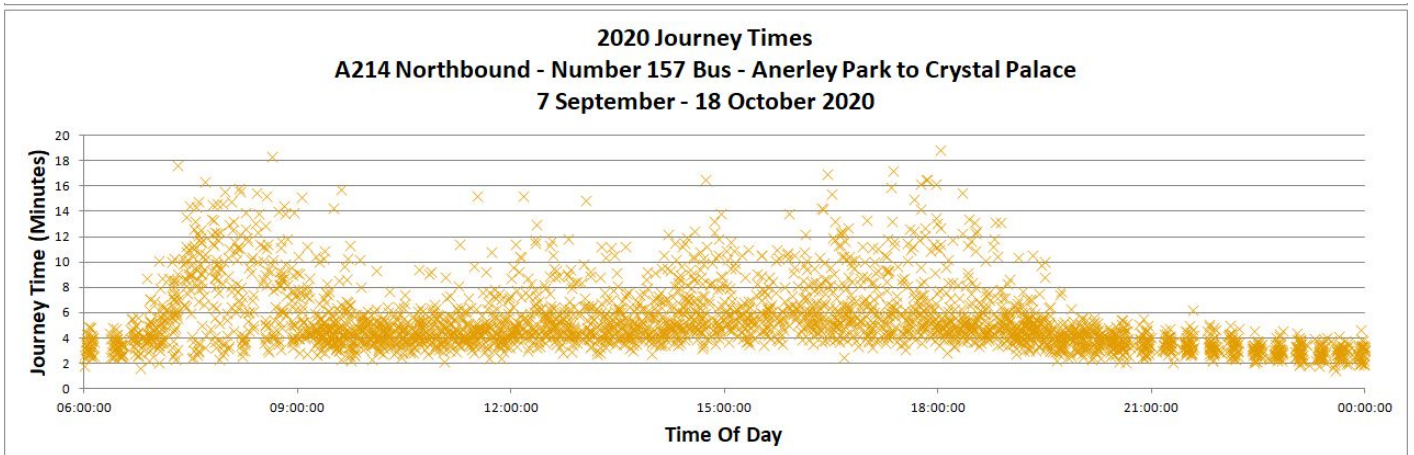
Before and after the LTN



Before the LTN





After the LTN



SOURCE: [TfL IBus journey time data](#)

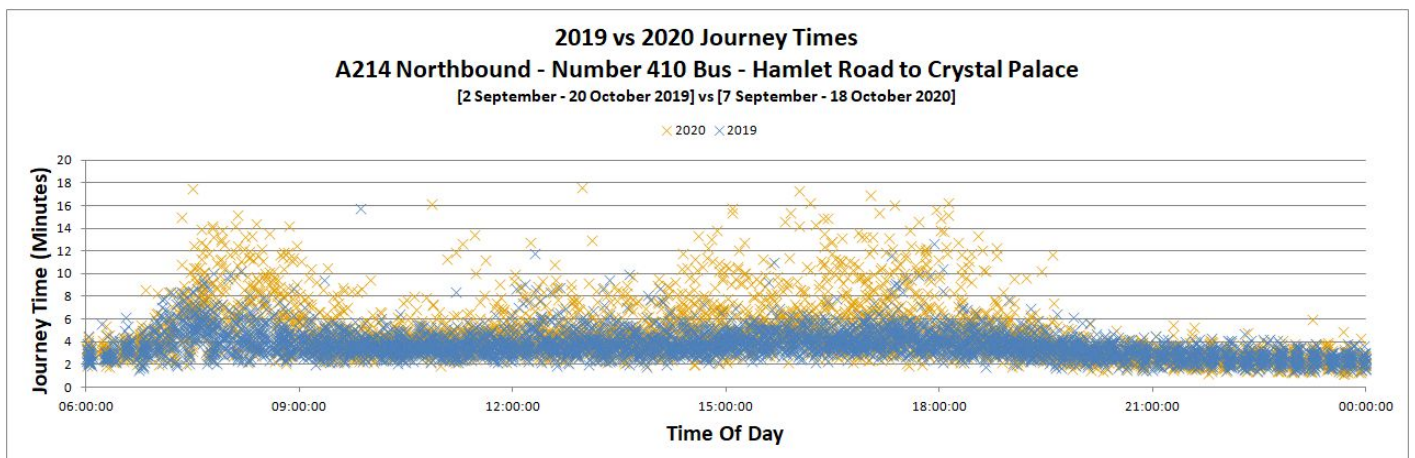
Number 410 - A214 Northbound into Crystal Palace

The route

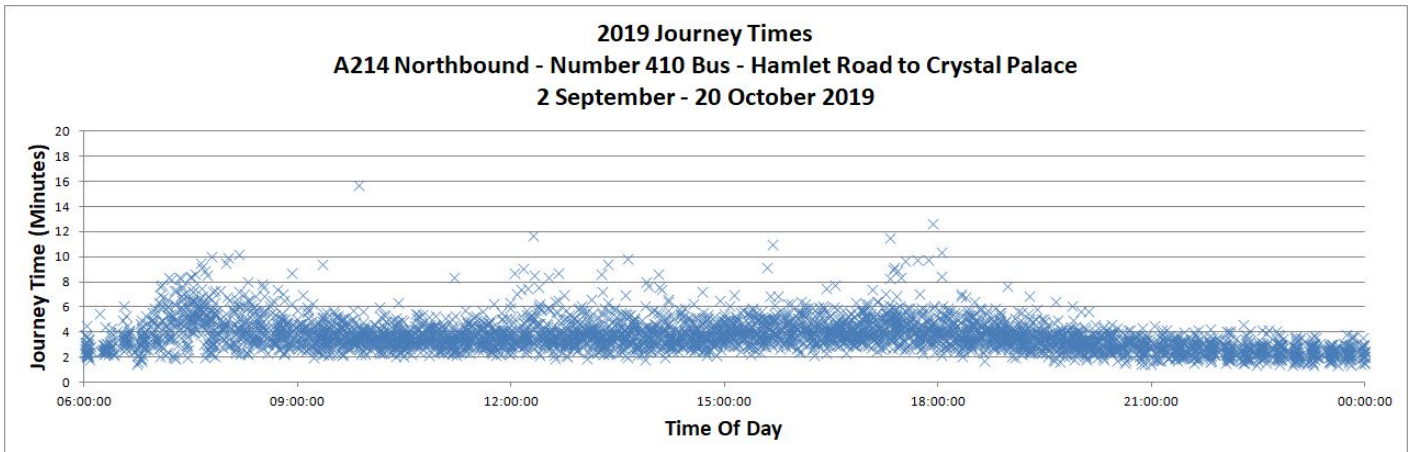
-  Potentially impacted by the Crystal Palace Scaffolding
-  Impacted by Crystal Palace and South Norwood LTN road closures



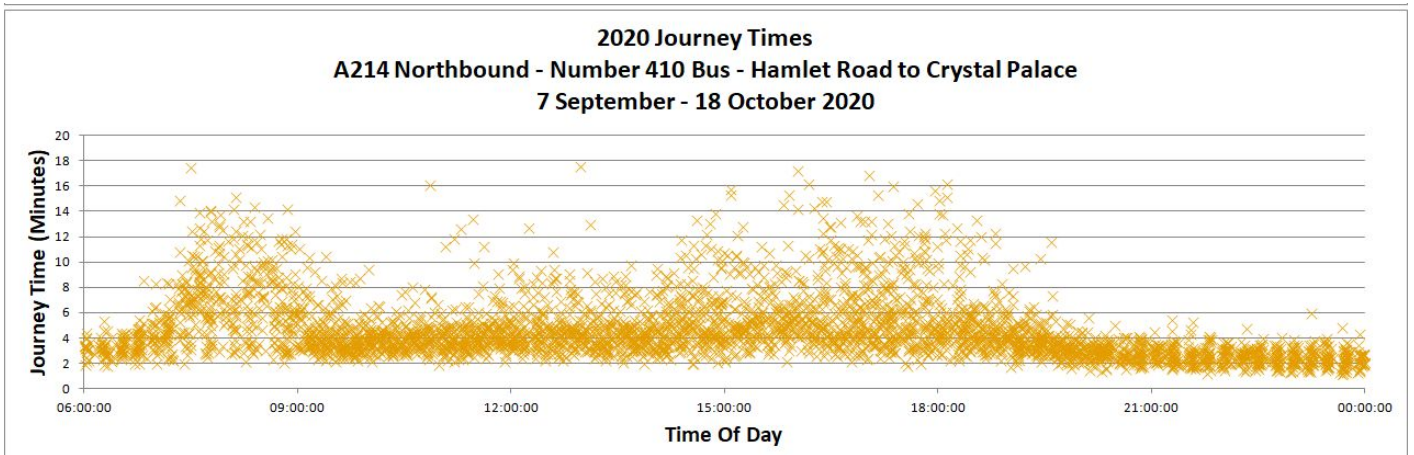
Before and after the LTN



Before the LTN



After the LTN



SOURCE: [TfL IBus journey time data](#)

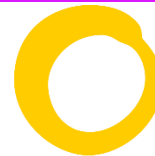
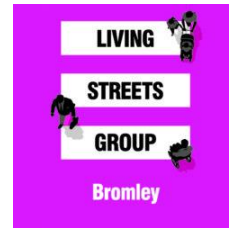
Thank you

openourroadsnow@gmail.com

SHAPE BETTER STREETS

Submission by Crystal Palace and South Norwood Shape Better Streets

Supported by



friends of the earth
Croydon



Your voice for a cycling borough



Who we are

Shape Better Streets is a resident campaign supporting the principle of a Low Traffic Neighbourhood in Crystal Palace and South Norwood. Our website address is: <https://crystalpalaceltn.org/> and our email address is CrystalPalaceLTN@gmail.com.

Bromley Cyclists forms part of the London Cycling Campaign - a group which campaigns for better cycling facilities and promotes cycling to all Londoners

Bromley Living Streets is a group of residents in the London Borough of Bromley, campaigning for safer, quieter, low-traffic neighbourhoods which encourage walking and cycling.

Cadence is a cycling hub open to every level of bike rider. We describe ourselves as being 'more than a bike shop and more than a club'.

Croydon Cycling Campaign is a group of Croydon locals who want to see Croydon transformed into a city that is welcoming to cyclists of all ages and abilities. We work with the council to encourage high quality provision for cycling, organise rides and socials and campaign tirelessly for a real cycling revolution.

Friends of the Earth Croydon is part of a national and international community dedicated to protecting the natural world and the wellbeing of everyone in it. We lead campaigns, provide resources and information and drive real solutions to the environmental problems facing us all.

Croydon Climate Action, founded in 2019, works in partnership with Croydon Friends of the Earth specifically to work on local campaigns relating to climate change. We are a group of passionate individuals who work with local councils, businesses, schools and communities to ensure the future of Croydon is climate-friendly.

Croydon Living Streets is a group of volunteers working to make everyday walking safer, easier and more enjoyable across our community.

Holmesdale Community Action Group is a community group bringing neighbours together who are dedicated to making our local area a safer, cleaner and better place to live.

Labour Cycles is a community of Labour members committed to ensuring active travel is the for the many, not the few.

London Cycling Campaign is a 11,500-strong membership charity, making sure that everyone who cycles, or wants to cycle, has a voice in Greater London.

Peddle My Wheels is a circular economy business that aims to make cycling accessible and affordable for everyone.

Key points

- The climate crisis, national and local policy all call for a local approach based on reducing private vehicle use and the air quality, noise and traffic danger it creates, to make neighbourhoods safe and pleasant and encourage active travel.
- The LTN experiment should therefore only be abandoned if there is strong evidence that any harms significantly outweigh the benefits and cannot be mitigated by changes to the scheme.
- Over the last decade, traffic volumes on some streets in the neighbourhood have more than doubled – to 12,000 movements a day, based on January 2019 data – comparable or more than some nearby main roads. This is consistent with the increase in vehicle use seen in London over recent years, which has almost all taken place on streets which are not part of the main road network.
- The majority of people rat-running through the neighbourhood have been flouting the law by exceeding speed limits and other dangerous and anti-social behaviour.
- The increase in traffic has led to completely unacceptable consequences for air quality, noise, and danger, especially for active travel. It has degraded the neighbourhood as a place to live. The official London cycling route through the neighbourhood was experiencing levels of traffic far higher than TfL's standards for back street, "quiet" routes without formal cycling infrastructure.
- The experimental LTN has, in only three months from inception, led to at least a two thirds reduction in vehicle traffic, with accompanying reductions in air pollution, noise and traffic danger, and a tripling of walking and cycling.
- The main genuine problem which has emerged is some increase in traffic on adjoining streets in the borough of Bromley – though on nothing like the scale previously experienced in the streets where LTN measures have been installed. This has eased, as a result of Church Road reverting to normal working. If the scheme changes to allow resident access from Church Road further south, it should reduce further traffic on these streets. If there continued to be a problem, it could be addressed without allowing 10,000 or more vehicles a day back on to Auckland Road and other streets.
- There is a complete lack of objective evidence for other claimed disbenefits – emergency services access, social safety, increases in congestion and pollution on surrounding roads, and damage to the Triangle town centre economy. The improvement in local congestion following the removal of the restriction in place on Church Road from March to October shows clearly that the LTN has not had an unacceptable impact on local main road capacity. Main roads remain congested at times, and hostile environments for active travel, as they have been for decades. That can and should be tackled as an issue in its own right.
- The streets in the LTN can either be a pleasant, safe neighbourhood to live, and an a quiet, safe, attractive corridor for active travel away from main roads. Or they can be a congested, polluted, dangerous, bypass for the Triangle and the main roads. They cannot be both. There is no credible basis for the council choosing the latter.

Policy context: Global, national, London

Climate Crisis

The world is experiencing a climate crisis, with 2019 concluding a decade of exceptional global heat, retreating ice and record sea levels driven by greenhouse gases produced by human activities. To prevent warming beyond 1.5 °C (the recognised limit for land and sea to cope is 1.5-2 °C), we need to reduce emissions by 7.6 % every year from this year to 2030.¹

The 2015 Paris Agreement was drawn up to limit global temperature rise to no more than 2° C above pre-industrial levels but also offered national pledges for countries to cut or curb their greenhouse gas emissions by 2030. The initial pledges are already insufficient to meet the target.²

Air Quality

The World Health Organisation estimates that air pollution costs the UK economy approximately £54 billion a year. This accounts for 3.7 % of GDP in Britain.³

Up to 36,000 deaths every year are linked to air pollution in the UK (based on figures from 2010-2017) and over 35 % of local authorities (including more than 22 million people) had areas with unsafe levels of fine particulate matter (PM_{2.5}) in 2018.

More locally, Transport for London (TfL) has undertaken research into the economic costs of the health impacts caused by air pollution in London. The research estimates an annual economic cost of up to £3.7 billion, made up of the cost of treatment, lost work hours and concern and inconvenience to family members.⁴

There is growing evidence of a link between poor air quality and vulnerability to COVID-19. A recent study estimated that about 14 % of deaths in the UK from COVID-19 – some 6,100 to date – could be attributed to long-term exposure to air pollution.⁵

Traffic and Travel

Congestion cost the UK economy £6.9 billion in 2019 and on average, UK road users lost 115 hours and £894 a year to congestion⁵. In terms of the human cost, over three quarters of deaths due to injury in the age bracket of 10–18-year-olds are related to traffic incidents.⁶

2,324 people were killed or seriously injured (KSI) on London streets in road traffic collisions in 2013. There are an estimated 5,900 deaths per year in London due to long-term exposure to NO₂, and 3,500 deaths due to long-term exposure to fine particulate matter (PM_{2.5}).⁷

London's population is projected to increase by 24 % by 2041. With this expansion, rising public transport demand means that, without further action, the majority of morning peak travel on both National Rail and London Underground would be in crowded conditions.⁸

The Mayor of London's own transport strategy is very clear on what action needs to be taken:

"At its heart is a bold aim for 80 % of all trips in London to be made on foot, by cycle or using public transport by 2041."

Private vehicle use is certainly not the answer to the public transport crisis. Household car ownership in Greater London is significantly lower than the average in England. In addition, over one third of all the car trips made by London residents are less than 2 km and could be walked in up to 25 minutes. Habit strongly influences the choice of travel mode.⁹

The Impact of COVID-19

Following unprecedented levels of walking and cycling across the UK during the pandemic, the Department for Transport (DfT) published plans to help encourage more people to choose alternatives to public transport when they need to travel. This should make it easier to follow healthier habits, and make sure the road, bus and rail networks are ready to respond to future increases in demand.¹⁰

In May 2020 the Emergency Active Travel Fund was formally announced. It supports local authorities to develop cycling and walking facilities and projects such as Low Traffic Neighbourhood schemes (LTN schemes). The accompanying Department for Transport guidance, reaffirmed and updated in November 2020, urges highways authorities to implement measures to reduce rat-run traffic on minor roads:

*"Modal filters (also known as filtered permeability); closing roads to motor traffic, for example by using planters or large barriers. Often used in residential areas, when designed and delivered well, this can create low-traffic or traffic-free neighbourhoods leading to a more pleasant environment that encourages people to walk and cycle, and improving safety."*¹¹

Survey results show clear support for these initiatives:

- Respondents overwhelmingly agreed that the government should act in local neighbourhoods to increase road safety (88 %), improve air quality (86 %), reduce traffic congestion (83 %) and reduce traffic noise (75 %).
- Three quarters of respondents supported the reduction of road traffic in towns and cities in England (77 %) and their local area / neighbourhood (78 %), and two thirds of respondents were supportive of reallocating road space to walking and cycling across towns and cities in England (66 %) and their local area / neighbourhood (65 %).¹²

In London particularly, where public transport use is usually high, the need was critical. TfL warned that due to social distancing, capacity on the Tube would be reduced to 15–20 % and 20–25 % on buses. If nothing was done, TfL's own modelling showed a doubling of car use in central London, assuming a third of pre-lockdown journeys returned and those who cannot get on to public transport shifted to cars.¹³

Mini-Hollands – the evidence from schemes in place

This national and London policy emphasis reflects evidence from pathfinder mini-Holland schemes. A study investigating the early impact of the mini-Holland schemes in Waltham Forest discovered that people in areas with active travel schemes were 24 % more likely to

have done any cycling in the previous week and walked or cycled for 41 minutes per week more than those where such improvements have not yet been made.¹⁴

More recent research has consistently found that living near interventions has led to a 40–45-minute weekly increase in active travel, providing confidence that even in more car-dependent, suburban areas, active travel infrastructure can spur take-up, and that such growth can provide high health economic benefits in relation to intervention costs. There is also a consistent trend towards people in the LTN area being less likely to own a car, with the largest decrease in car use always within the LTN group.¹⁵

Public Health

It is estimated that more than 14 % of children age 11 are overweight and more than 23 % are obese. Countries with the highest levels of cycling and walking generally have the lowest obesity rates. People who cycle live two years longer on average than people who do not and take 15 % fewer days off work through illness.¹⁶

The total cost of obesity to wider society is estimated at £27 billion. The UK-wide NHS costs attributable to excessive weight and obesity are projected to reach £9.7 billion by 2050, with wider costs to society estimated to reach £49.9 billion per year.¹⁷

The Mayor of London's Childhood Obesity Taskforce has called for a rapid increase in the number of 'public realm improvements that reduce traffic and support children's health, well-being and mobility' as one of its 10 ambitions for tackling childhood obesity in the capital.¹⁸

Children and School Travel

With the 'school run' a key contributor to rush hour traffic, this seems an easy target to reduce private car use, particularly given the potential benefits in health for the younger generation.

- 76 % of trips to school made by primary school children are under 2 miles, compared to 49 % of trips to school made by secondary school children. For secondary school children, trips to school are more likely to be between 2 and 5 miles (29 %).
- 88 % of children aged 7 to 10 were usually accompanied to school by an adult in 2013, this proportion drops to 31 % for children aged 11 to 13.
- 43 % of children are accompanied to school because of fear of road danger.¹⁹

If only a small fraction of these journeys were converted to active travel, it would have a huge positive impact on by reducing the volume of vehicular traffic on our roads.

Policy context: Croydon

Local policy and strategies on climate, transport and public health all point clearly towards reducing motor vehicle use and encouraging active travel.

Climate

In June 2019 Croydon Council declared a climate emergency, with an ambitious target of ensuring the borough is carbon neutral by 2030.²⁰ It has set up a Climate Crisis Commission, one of whose workstreams is on transport and energy.²¹ A Citizen's Assembly sponsored by the council and operating in early 2020 said "we want to see fewer cars in total on the borough's roads with shorter journeys in particular being cut."²²

Air Quality

In Croydon alone, background concentrations of PM_{2.5} have been measured as dangerous and in breach of World Health Organisation (WHO) limits. In 2018 an estimated 6.16 % of deaths in the borough were attributable to PM_{2.5} air pollution which was equivalent to 151.5 deaths.²³ Croydon's Air Quality Management Plan includes a commitment to reprioritise road space to enable walking and cycling.²⁴

Active travel

Croydon has developed a strong policy commitment to active travel in recent years. The 2018-23 Cycling Strategy, published in 2017, set out an approach, including establishing an inclusive cycling culture and establishing safe routes. One of the routes earmarked for improvement was the long-standing London Cycle Network route along Lancaster and Auckland Roads.²⁵ The Croydon Cycling Campaign has been arguing for several years that it should be improved by cutting rat-run traffic.²⁶

The controlling Labour Group's 2018 manifesto made strong commitments on active travel, with a particular focus on children and young people – to support initiatives "that encourage children to walk and cycle to school" and to put in place an approach to transport which "enable[s] people to get out of their cars... work[s] to achieve the principles of Vision Zero ...and makes Croydon... easy to get around and enjoy, especially for young people, older people and disabled residents."²⁷ These commitments are reflected in the council's current corporate plan.²⁸

How the policy context should shape a decision

The weight of national, London and local policy points overwhelmingly to the need to reduce motor vehicle use and encourage active travel. It also points to the importance of creating low-traffic environments in which the air and noise pollution associated with excessive traffic is removed, and in which active travel is encouraged.

That does not, of course, justify persisting with a particular scheme if it does not achieve these objectives, or results in significant unintended adverse consequences. But it does point strongly towards only abandoning a scheme if:

- there is clear evidence that the harm outweighs the benefits;

and

- any harm cannot be addressed by modifications to the scheme.

Our argument is:

- The scheme has resulted in very significant benefits.
- There are some harms, but many of the claims which have been made about adverse consequences are, at best, exaggerated, and in some cases are not supported at all by the evidence.
- Changes to the scheme could reduce the genuine harms significantly.

About the Crystal Palace and South Norwood LTN

Geography

The neighbourhood in which the LTN has been established is, in formal terms, the parts of Croydon's South Norwood, and Crystal Palace and Upper Norwood, wards bounded by: the A213 South Norwood High Street; the A215 South Norwood Hill; the A212 Church Road; the boundary with Bromley; and the railway line between Crystal Palace and Norwood Junction,

However, part of the boundary with Bromley does not follow any strong natural features, and a wider definition of the neighbourhood would extend to the A214 Anerley Hill and Anerley Road.

On this broader definition, the neighbourhood is about a mile and a half north to south, and around half a mile wide.

The neighbourhood occupies the eastern slopes of the southern end of the Norwood Ridge. Broadly, the difference in elevation between Church Road and South Norwood Hill on the western boundary of the neighbourhood, and the lower lying streets is greatest (around 50 m of elevation) towards the northern end, and less or negligible towards the south. A road, called successively Lancaster Road, Auckland Road and Hamlet Road, runs through the neighbourhood from south to north. Various streets run west from it to South Norwood Hill and Church Road. There are networks of streets east of it, to the south around Warminster Road, and to the north round Sylvan Road and Maberley Road. Travel (by any mode) to the east is completely blocked by the railway line, which can only be crossed on the main roads at the northern and southern ends of the neighbourhood. The Auckland Rise estate occupies a substantial area east of Church Road and south of Sylvan Hill, and there is a significant amount of social housing on the Bromley side, between Anerley Road and Belvedere Road.

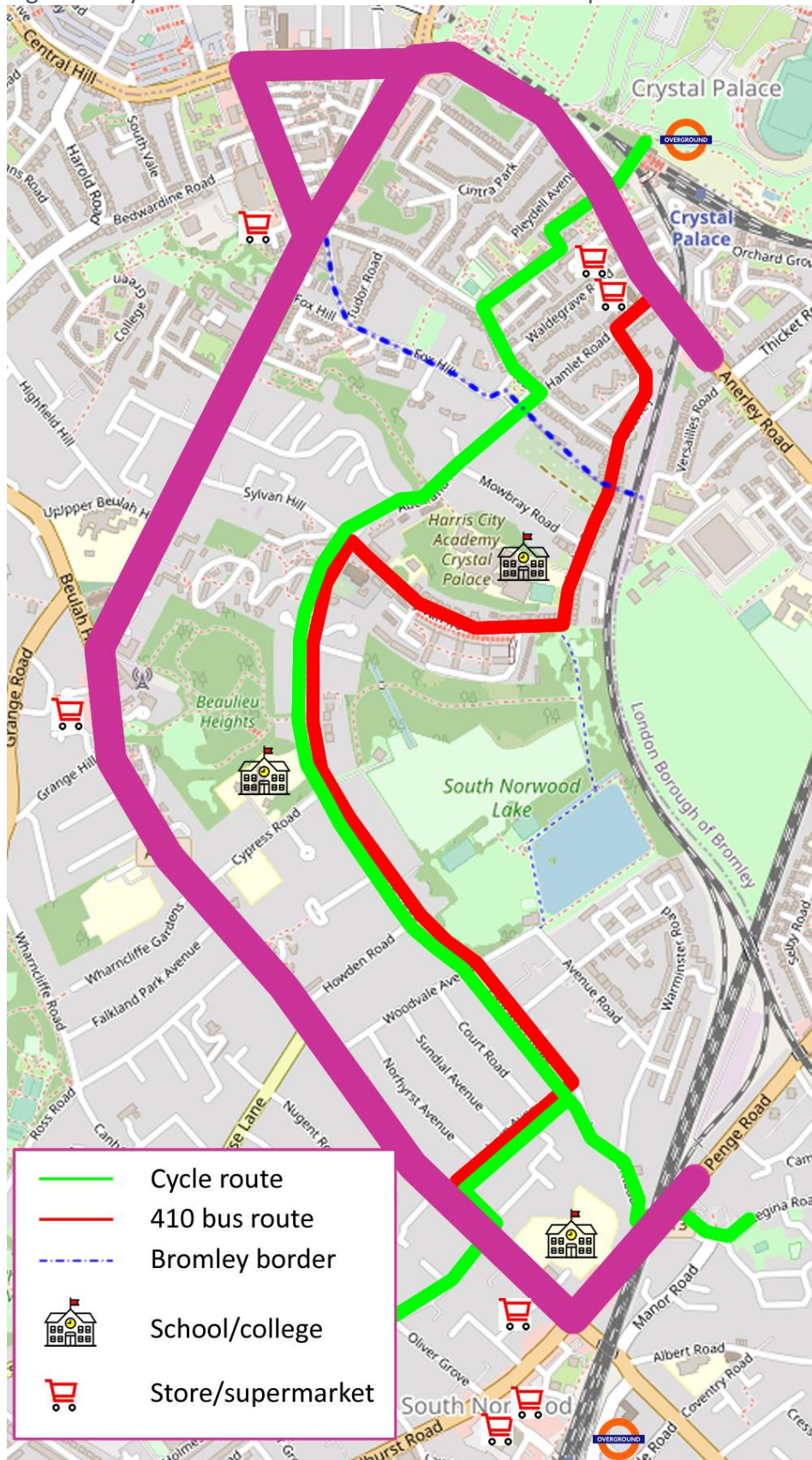
There are several areas of public open space in the neighbourhood, principally South Norwood Lake and Grounds, Beaulieu Heights and Stambourne Woodland.

There is one primary school in the neighbourhood (Pegasus Academy Cypress School), and two secondaries: Harris City Academy Crystal Palace towards the north, and Harris South Norwood on the South Norwood Hill boundary road at the southern end. There is a community centre (Waterside) adjacent to the South Norwood Lake.

There are railway stations (Norwood Junction and Crystal Palace) close to the northern and southern ends of the neighbourhood. Buses run along the main roads bounding the neighbourhood, and there is a service (410) running through the neighbourhood itself from south to north via Southern Avenue, Lancaster Road, Auckland Road, Sylvan Road, Maberley Road and Hamlet Road. A long-standing London Cycle Network route runs through the area along Lancaster Road, Auckland Road, Belvedere Road and Chipstead Close.

Figure 1 is a map of the area.

Figure 1: Crystal Palace and South Norwood LTN: Map



Demography

Figure 2 shows key demographic information.²⁹ The population is around 7,400 (Croydon only) or 11,400 (including the Bromley streets). Over 40 % of the population is Black, Asian and Minority Ethnic (BAME). There are around 3,200 households in the Croydon section, a further 1,800 in the Bromley section. 43 % of households do not have access to a private vehicle. Taken as a whole, the neighbourhood is around the bottom of the middle third of the income distribution. The census districts within it range from two within the 30 % poorest in England to one around the middle of the income distribution. The neighbourhood is more affluent than some of the area to the south of it (the other side of South Norwood High Street), and less affluent than much of the area to the west (the other side of Church Road).

Figure 2: Key demographic information

Census LSOA	Income decile (lower number=poorer)	Population	% BAME	Households	No car	%no car	
Croydon	008A	3	1272	57.8	568	243	42.8
	007D	4	1868	52.1	620	194	31.3
	007C	4	1638	44.7	773	310	40.1
(part)	001A	4	1052	37.6	438	173	39.5
	001B	5	1523	34.8	774	306	39.5
Bromley	005B	3	1917	30.1	842	480	57.0
	005E	4	2125	29.7	949	450	47.4
Total (Croydon only)	3.5	7353	45.8	3173	1226	38.6	
Total (including Bromley)	3.4	11395	40.1	4964	2156	43.4	

There is no data about the income status of households within the neighbourhood as opposed to the boundary roads. The two main areas of social housing both have some frontage on main roads, but most of the properties in them do not front main roads. There is no reason to believe that, taken as a whole, there is any difference in income levels between the boundary roads and the rest of the neighbourhood.

Summing up:

- The neighbourhood has a large population.
- It is diverse.
- It is not particularly well-off.

It is a long way from the “small, wealthy, white, enclave” scheme opponents have claimed.

Traffic in the neighbourhood before the LTN

Data

There are three sources of quantitative data about traffic in the neighbourhood before the LTN:³⁰

1. Council data from January 2013 recording vehicle numbers and speeds westbound on Auckland Road at the junction with Stambourne Way. These record numbers of motor vehicles (only) and speeds in one direction only (west/south towards South Norwood. They do not record vehicle type (car, van, etc).
2. Data downloaded by the council in January 2019 from the speed display device in Auckland Road just east of the junction with Stambourne Way, containing the same information as 1, though distinguishing between speeds below 20 mph and between 20 mph and 30 mph. (There is also data for August 2019, but that was, of course, at a time of year without school traffic, and which generally tends to be less busy.)
3. Counts carried out manually by residents in June and July 2020 in Sylvan Hill and Auckland Road. These include pedestrians and cyclists as well as vehicles, recorded by type, but do not record speeds. These counts both took place after the LTN's first phase with planters in South Norwood and on Auckland Road; and before the conversion into a bus gate on Auckland Road and the installation of planters on Sylvan Hill. However, they were carried out in the earlier phases of the lifting of the spring lockdown, when traffic levels still had not recovered from their very low levels. In particular, the schools were only open to a minority of pupils.

Rat-runs

Before the LTN was introduced, vehicles were able to make through journeys across the neighbourhood. The main rat-runs were:

1. Southern Avenue and Lancaster Road (and vice versa) as a route between South Norwood Hill and South Norwood High Street.
2. Hamlet Road, Auckland Road and Sylvan Hill, with some traffic also using Fox Hill and Stambourne Way, (and vice versa) as a route between Anerley Road and Church Road.
3. Hamlet Road, Auckland Road, Lancaster Road, and either Southern Avenue or the south end of Lancaster Road (and vice versa) as a route between Anerley Road and South Norwood.
4. As 3, but using Sylvan Hill, Stambourne Way and Fox Hill to travel to or from Church Road.

These routes (2 in particular) were indicated on navigation apps as preferable to the main roads even when traffic on the main roads was light.

Traffic volumes

In just over 6 years, the daily one-way total had well over tripled – equivalent to traffic increasing by nearly 23 %, year after year. Assuming broadly equal numbers of vehicles going both ways in the course of a day, the 2019 total is equivalent to around 12,000 vehicles a day. Figure 3 below shows the 2013 and 2019 daily totals

Figure 3: Vehicle movements, Auckland Road, Westbound, January 2013 and January 2019
 Source: Croydon Council

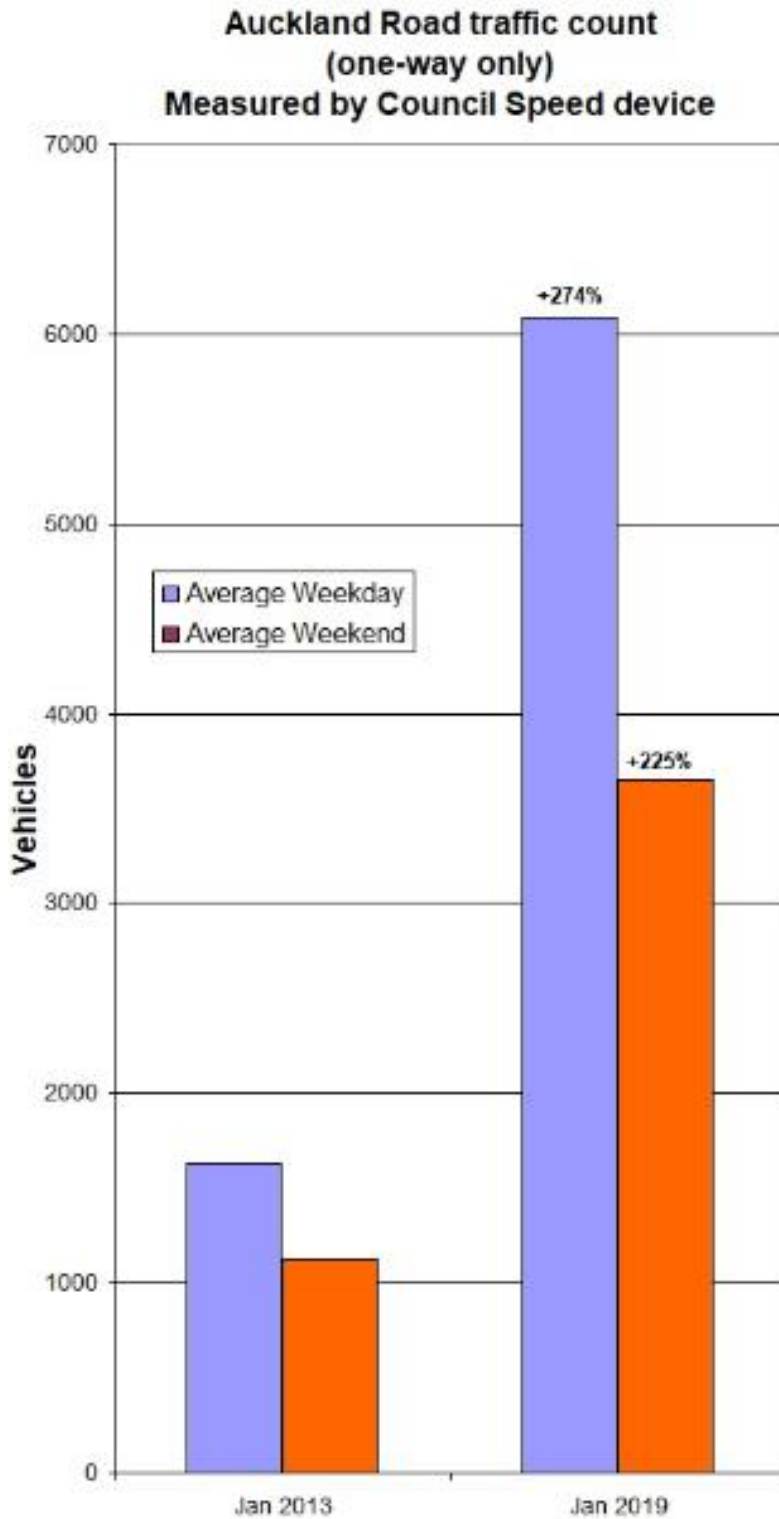
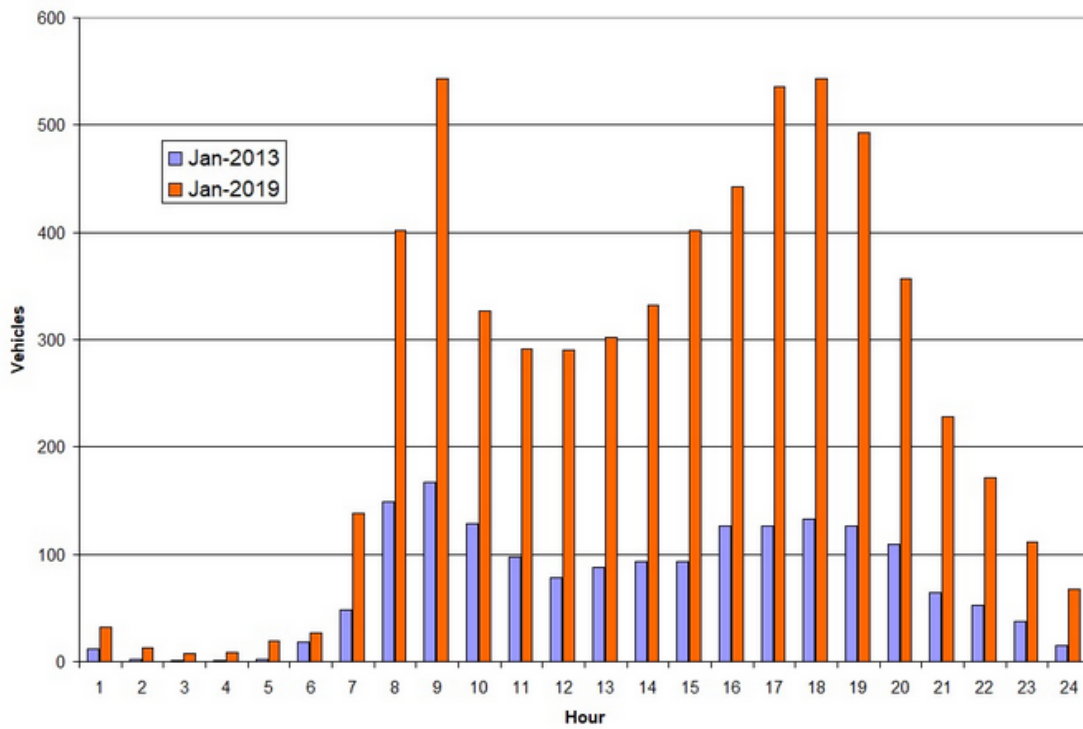


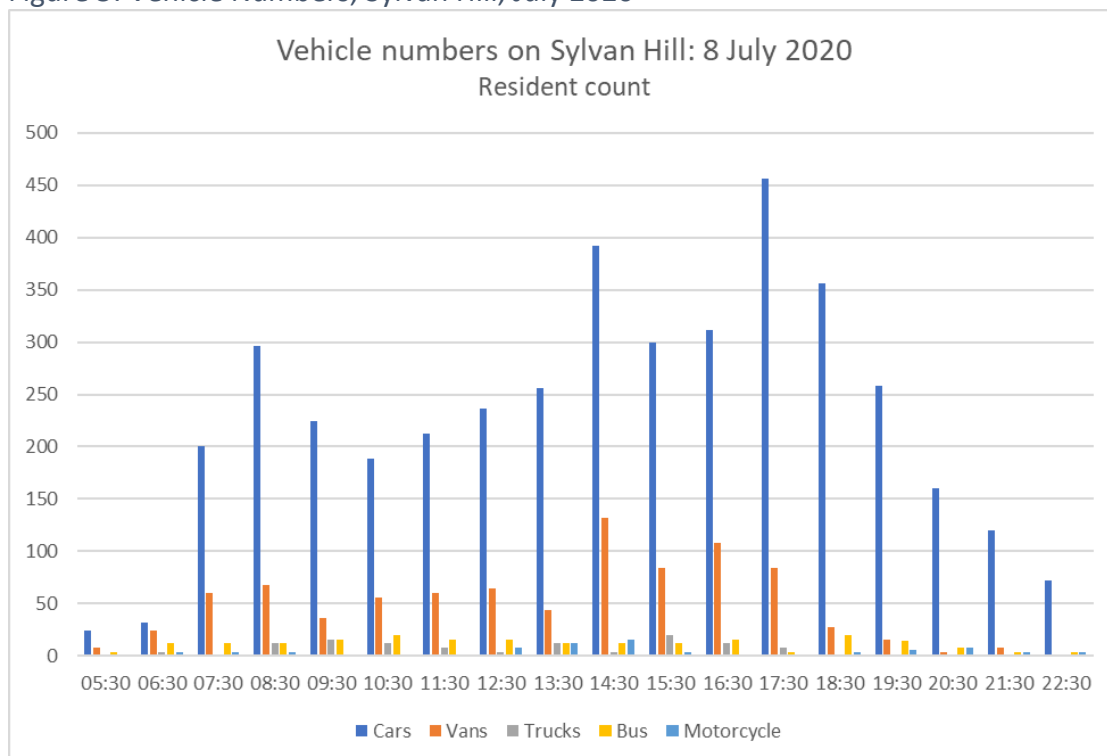
Figure 4 shows the hourly distribution in the two years. In 2013, one-way traffic only exceeded 100 vehicles per hour for 8 hours in the day. In 2019, high traffic was constant from early morning until well into the evening: over 290 vehicles an hour (one way) from 8 am to 9 pm.

Figure 4: Auckland Road traffic - 2013 and 2019: weekday hourly
Auckland Road hourly traffic count (one-way only)
Measured by Council Speed device



In June and July 2020, residents carried out weekday manual counts on Auckland Road and Sylvan Hill. The results of the July counts (the lower of the two) are shown in Figure 5 below.

Figure 5: Vehicle Numbers, Sylvan Hill, July 2020

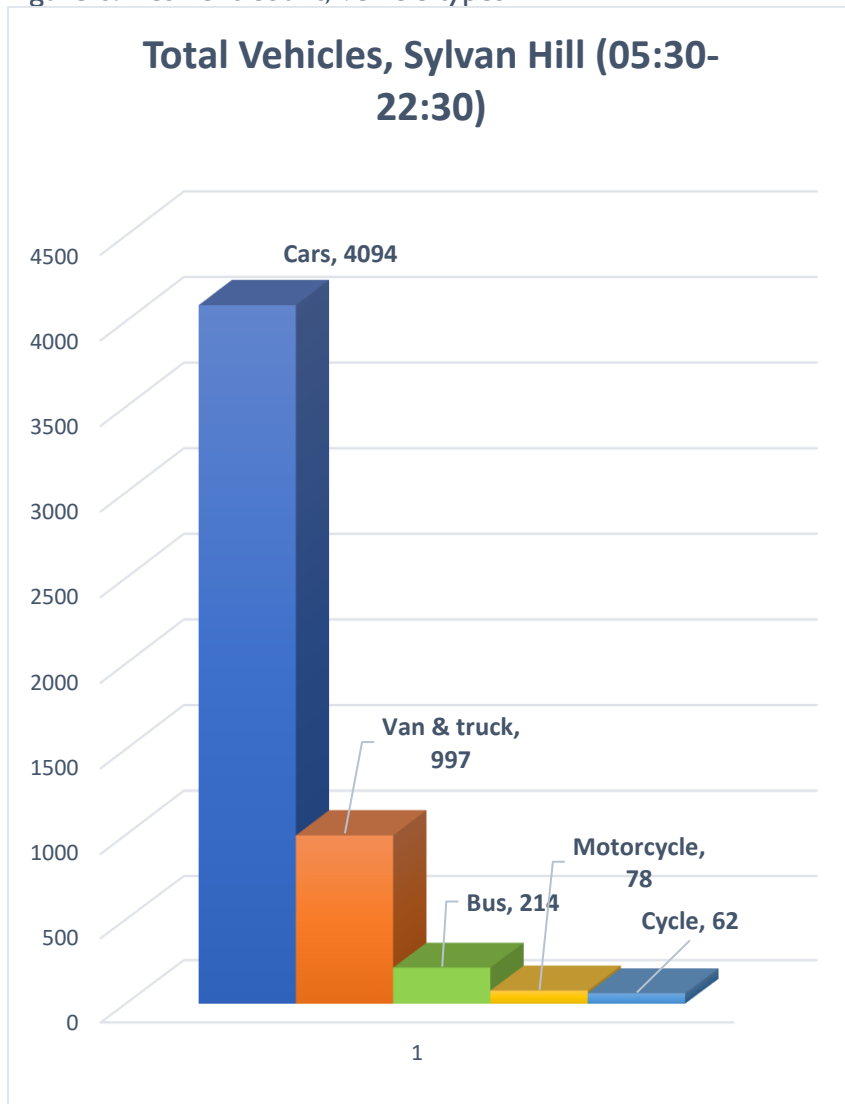


The daily total from this count, around, 5,400, is somewhat lower than the August 2019 council data, but still over 50 % higher than 2013. A number of factors may have been in play:

- In early July 2020, lockdown restrictions had not been fully lifted. In particular, schools were only operating for a limited number of pupils.
- Because, at that time, Auckland Road was closed to vehicles further south, Sylvan Hill was carrying traffic which would otherwise have been on Auckland Road. The 410 bus was using Sylvan Hill, but only accounts for at most 5 % of the vehicle movements recorded.

As Figure 6 shows, Light Commercial Vehicles, vans and smaller trucks, accounted for about 20 % of the total.

Figure 6: Resident count, vehicle types



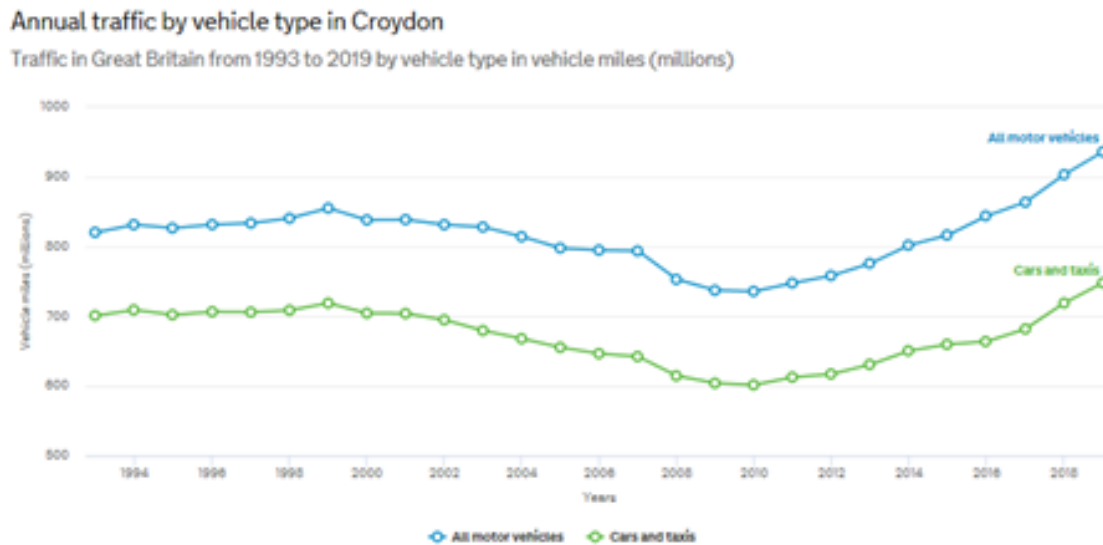
These are extraordinarily high volumes for side streets not part of the main road network. They are higher than recent data for the nearby A214 Central Hill and not much less than Anerley Road and Church Road.³¹ They are higher than the guideline figures suggested for

“Quietway” cycle routes in TfL guidance – critical since Lancaster Road and Auckland Road are designated as part of such a route.³²

The extent to which, within the last decade, Auckland Road and other streets have become, in effect, main roads, reflects broader trends across the borough and London as a whole.

Figure 7 below shows that in Croydon, there has been a 200-million-mile increase in miles driven in Croydon over the last 25 years, an increase of nearly 20 %.

Figure 7: Annual traffic by vehicle type: Croydon
Source: Department for Transport



But, as Figure 8 shows, the location of this increase has been very uneven. Across London as a whole, volumes on main roads have changed little. The entire increase has been on other streets, like Auckland Road and the other streets in the neighbourhood which have become rat-runs, and over the last 10 years or so. This increase is largely down to increased usage of satnav with traffic functionality, increased use of delivery services and lack of adequate cycling infrastructure.

Auckland Road and other now-busy streets in the neighbourhood are therefore the “canaries in the coal mine.” Their state, before the experimental LTN was introduced, was a consequence of an unsustainable growth in traffic volumes, and the diversion of that traffic off the main road network enabled by navigation apps.

Congestion

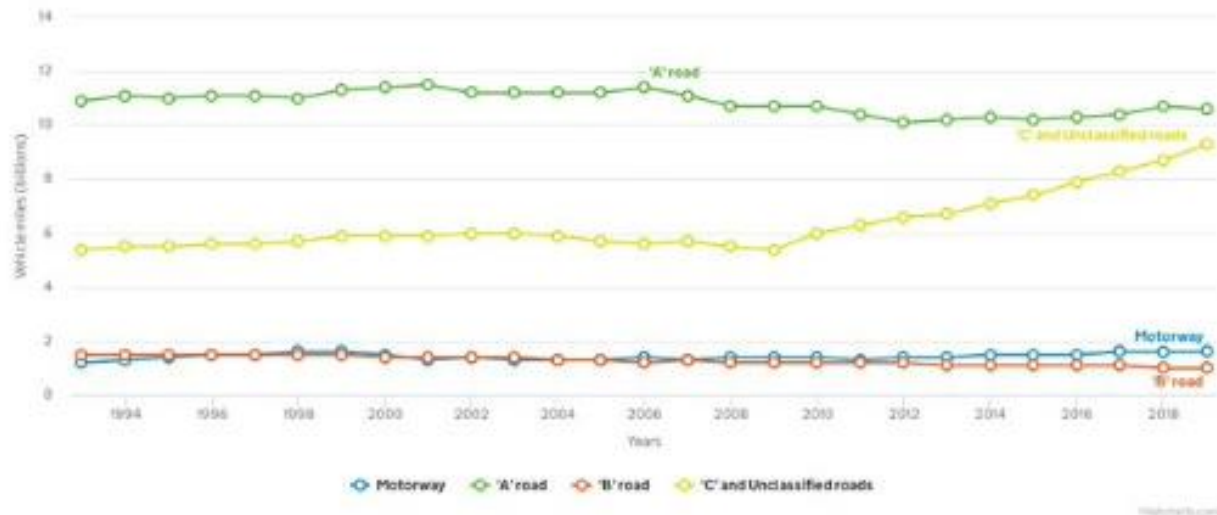
Because of the volume of traffic using streets not managed as main roads, and in particular with unrestricted parking, there was frequent congestion at pinch points such as the junction of Southern Avenue and Lancaster Road, on Hamlet Road, and on Auckland Road near the doctors’ surgery. On Hamlet Road, eastbound traffic often backed up as much as 300 m from the junction with Anerley Road. This would cause severe delays to the 410 bus and occasionally caused emergency vehicles to become stuck. It was common for altercations to take place between angry and frustrated drivers, both physically and verbally.

Figure 8: Traffic volumes: London and Croydon comparisons

Source: Department for Transport

Annual traffic by road type in London

Traffic in Great Britain from 1993 to 2019 by road type in vehicle miles (billions)

*Traffic danger*

The impact of traffic volumes was made worse by driver behaviour. On average, more than 80% of vehicles exceeded the posted 20mph limit. The median speed recorded on the road was 26.4mph – nearly a third above the speed limit. Half of all vehicles drove faster than this. The 85th percentile speed recorded was 33mph. That is, 15% of vehicles were being driven more than two thirds above the speed limit. The highest speed recorded was 70mph, at about 8:50pm in the evening. Most hours of the day, at least one vehicle was recorded at over 45mph.

This section of Auckland Road is used, and crossed, by large numbers of students walking to and from Harris City Academy Crystal Palace.

These streets have therefore recently been carrying volumes of traffic similar to main roads, with high levels of disregard for speed limits. But they are not managed or laid out with the features characteristic of main roads:

- Parking is much less restricted than is typical on main roads of similar width, and there are typically parked vehicles on both sides for significant stretches, leaving insufficient width for opposing vehicles to pass, and contributing to poor conditions for cycling when there are high volumes of traffic.
- Auckland Road contains a number of blind bends and crests. Combined with large numbers of parked vehicles, this means sight lines are poor in many places.
- There are no formal pedestrian crossings, only refuges at three locations along the whole length of Hamlet Road, Auckland Road and Lancaster Road, and no such features on any of the other roads. Sight lines are often blocked by parked vehicles.
- There are speed humps along the southern part of Auckland Road, and cushions further north on Auckland Road, Hamlet Road and on Sylvan Hill and Stambourne

Way. The cushions in particular do not appear to be effective in restraining speed, as the speed data summarised above shows.

- At the main junctions of streets in the neighbourhood with main roads – namely Hamlet Road/Anerley Road, Sylvan Hill/Church Road, Southern Avenue/South Norwood Hill and Lancaster Road/South Norwood Hill – there are no traffic signals or roundabouts.

Figure 9 is a photograph of Auckland Road, showing how the topography and high levels of on street parking make it unsuitable for high volumes of traffic.

Figure 9: Auckland Road: Typical look of street



As a result, the neighbourhood and its main road junctions have seen high volumes of traffic collisions. Junctions on Auckland Road within the neighbourhood also have a poor safety record (Figure 10).

There was a serious cycle injury on Sylvan Hill in July 2020, sadly illustrative of how large numbers of motor vehicles, many of them recklessly driven, created a dangerous environment, above all for people not in a motor vehicle. A driver overtook another travelling uphill, in the path of someone cycling downhill. The cyclist swerved off the road to avoid a head-on collision and hit a wall. The photograph below (Figure 11) shows a car that was involved in a collision on Southern Avenue last year. The car involved was driving fast enough for the car to mount the pavement on its roof. Luckily there were no pedestrians on the pavement at the time. There have been many other examples of speeding vehicles losing control on these residential roads.

Figure 10: Collision incidents in LTN and on junctions with main roads: 2000-2019³³



Figure 11: Crashed vehicle in Southern Avenue



Subjective safety for pedestrians and cyclists was poor. Pedestrians, in particular older and less able people, found crossing the roads, especially at the junctions of the 'hill roads' (Sylvan Hill, Stambourne Way and Fox Hill) extremely intimidating because of the speed and careless manner in which drivers took the turns.

"I felt like I was taking my life into my hands crossing Stambourne Way and Fox Hill at their junctions with Auckland Road. I was nearly hit several times and drivers frequently honked at me and verbally abused me." (Woman, 60, walking impairment)

"Before the LTN I would never have let my children walk or cycle to Cypress School alone. I used to have my heart in my mouth when my youngest (5) scooted off ahead of me." (Parent)

Before the LTN was in place very few parents would allow their children to walk to Cypress School due to safety concerns. In addition to this many parents would drive their children to local schools, including Harris Crystal Palace and Harris South Norwood. This would create pinch points and increased congestion at Lancaster Road, Southern Avenue and Auckland Road, which in turn caused delays to the bus and made the environment less safe for any children and adults not in cars.

Air quality

There has been, so far as we are aware, no air quality monitoring within the LTN. However, with Auckland Road and other streets carrying volumes of traffic comparable to nearby main roads, it is reasonable to assume that parts of the LTN were experiencing comparably poor air quality.

Noise

Likewise, there has not, so far as we are aware, been any monitoring of noise. Yet the volumes of traffic passing through some streets in the neighbourhood was clearly resulting in high levels of insidious noise pollution.

Impact on well-being

A survey of residents carried out in summer 2020 found that large majorities were concerned about air quality, noise and vibration.³⁴

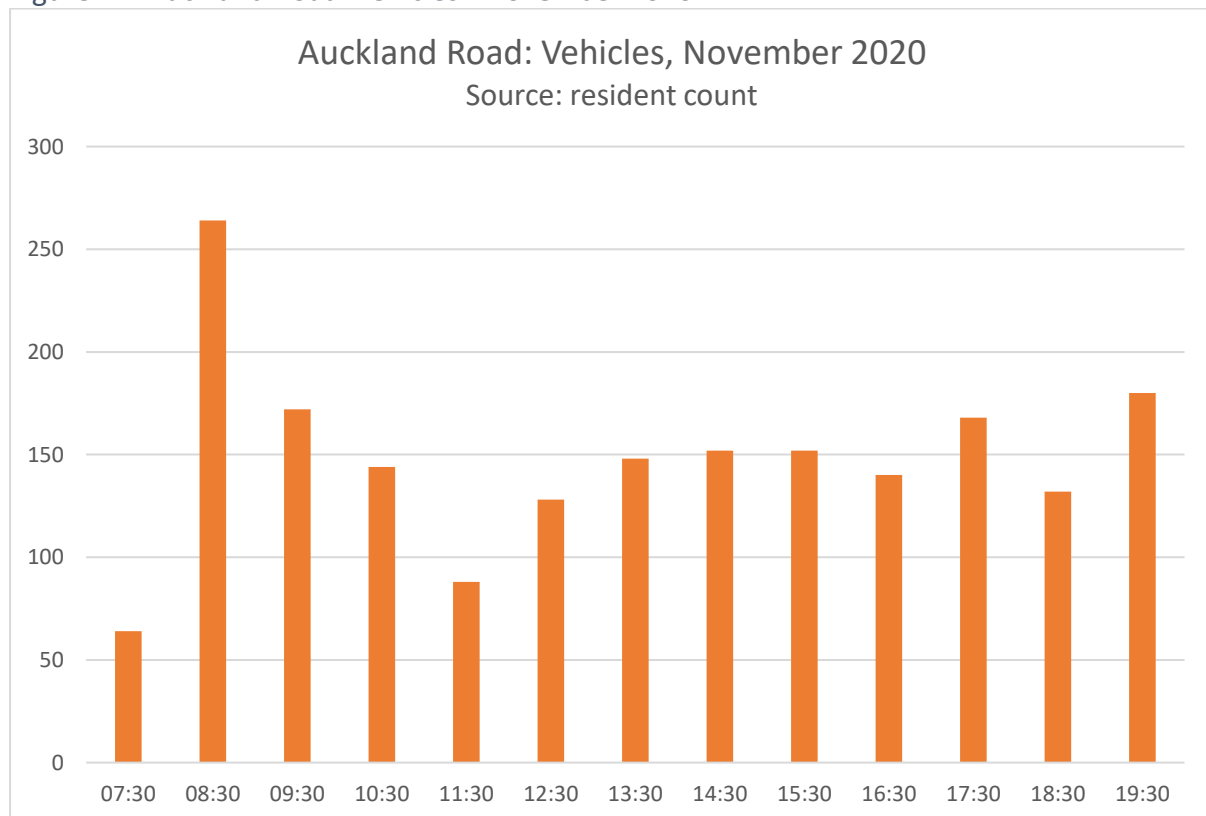
Positive Impact of the LTN

The introduction of the LTN has resulted in a dramatic reduction in motor traffic volumes on the previously busy roads in the neighbourhood (see pages 10–19 above). It has also led to more people walking and cycling.

Reduction in motor traffic movements, air and noise pollution, and traffic danger

Resident traffic counts carried out in the weeks beginning 16 and 23 November 2020 suggest a fall in motor traffic movements along Auckland Road and Sylvan Hill to around 1,700 per day, a two thirds reduction compared with July 2020 and three quarters compared with August 2019 (Figure 12). Only between 8 and 9am did numbers exceed 100 per hour.

Figure 12: Auckland Road: vehicles - November 2020



This fall in motor vehicle movements has had three main consequences for the local environment:

- A dramatic fall in air pollution. While there are no before or after measurements of air pollution, it is completely reasonable to assume that a two-thirds fall in vehicle movements will have resulted in much lower air pollution, and the experience of residents is certainly that the air is fresher.
- Likewise, a drop in noise pollution, as experienced on streets and in homes.

- A significant improvement in road safety. While a minority of vehicle drivers unfortunately continue to disregard the speed limit, and drive dangerously in other ways, the total volume of traffic has fallen so much that the incidence of dangerous driving and speeding is much less. The safety benefits are not just in the interior of the LTN. The intersections of the streets connecting the neighbourhood to the main roads (see pages 16–17 above) are also much safer for pedestrians and drivers because of the significant reduction in turning movements.

Travel to school

As well as the general reduction in traffic, the school run now has much less impact on the neighbourhood. Supported by positive communication from Harris City Academy Crystal Palace (HCACP), those parents who continue to drive their children to school are now dropping them or picking them up beyond the filters in Stambourne Way and Sylvan Hill. This means the street outside the main school entrance is now much quieter at the beginning and the end of the school day. This creates a safer environment for students and staff, supports social distancing, and reduces nuisance to local residents.

With the additional school street restriction further reducing motor access to Cypress Road, the great majority of home-school journeys to Cypress School are now by walking or cycling.

“Two girls from my class [Cypress School] now cycle to school regularly because the streets are now safe and school had a “Ride to School Week”. (Resident, 9)

“My son now cycles to school every day, on his own, as the roads are safe enough. He is really enjoying the freedom and getting fit.” (Parent)

Active travel

Figure 13 shows hourly estimates* of the numbers of people walking (in both directions) between 7 am and 7 pm in July and November.

The comparison is not like-for-like in an important respect. In July, there were few if any students of Harris City Academy Crystal Palace attending, whereas the school is currently functioning fully. Students account for a large proportion of the distinct peaks seen in the graph in the early morning and mid-afternoon, since Sylvan Hill is one of the main walking routes to the school. However, even removing 500–600 Harris student movements from the total, there has still been around a threefold increase in walking.

*Based on 15 minute counts at the half hour.

Figure 13: Sylvan Hill: Pedestrians

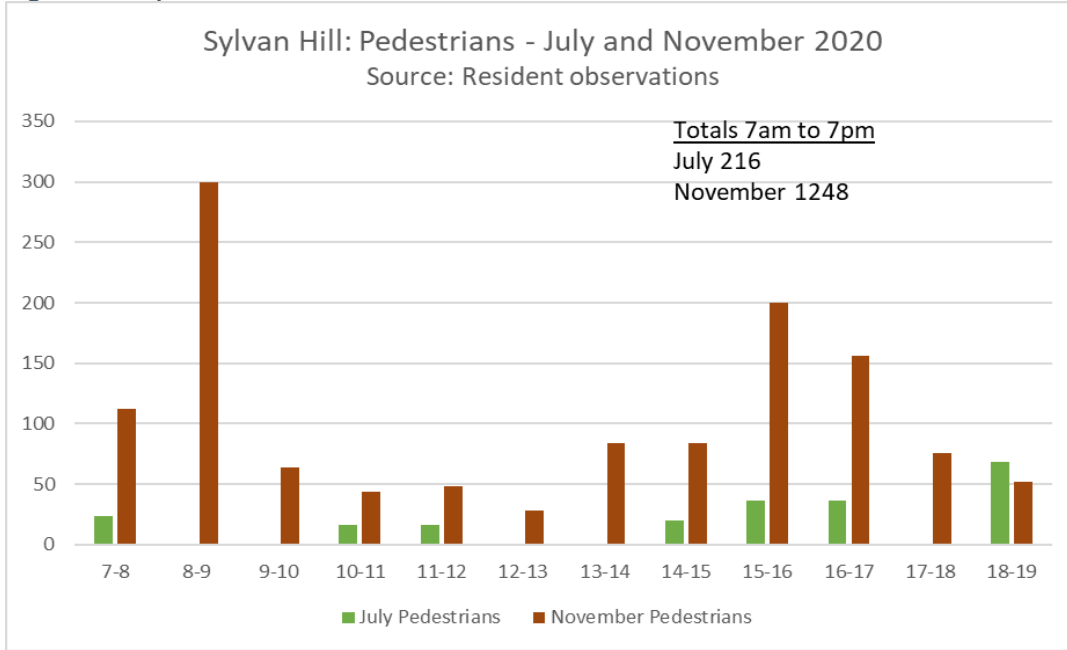


Figure 14 (below) shows hourly estimates of the numbers of people cycling (in both directions) between 7 am and 7 pm in July and November.

Total numbers have nearly tripled since the summer. During the morning commuting phase (7–9 am), there were approximately 60 cycle movements. While not counted separately, a considerable proportion of these were parents with children (on child seats or in cargo bikes or trailers). (Respect to these parents who are tackling the hill!)

Figure 14: Sylvan Hill: cycles

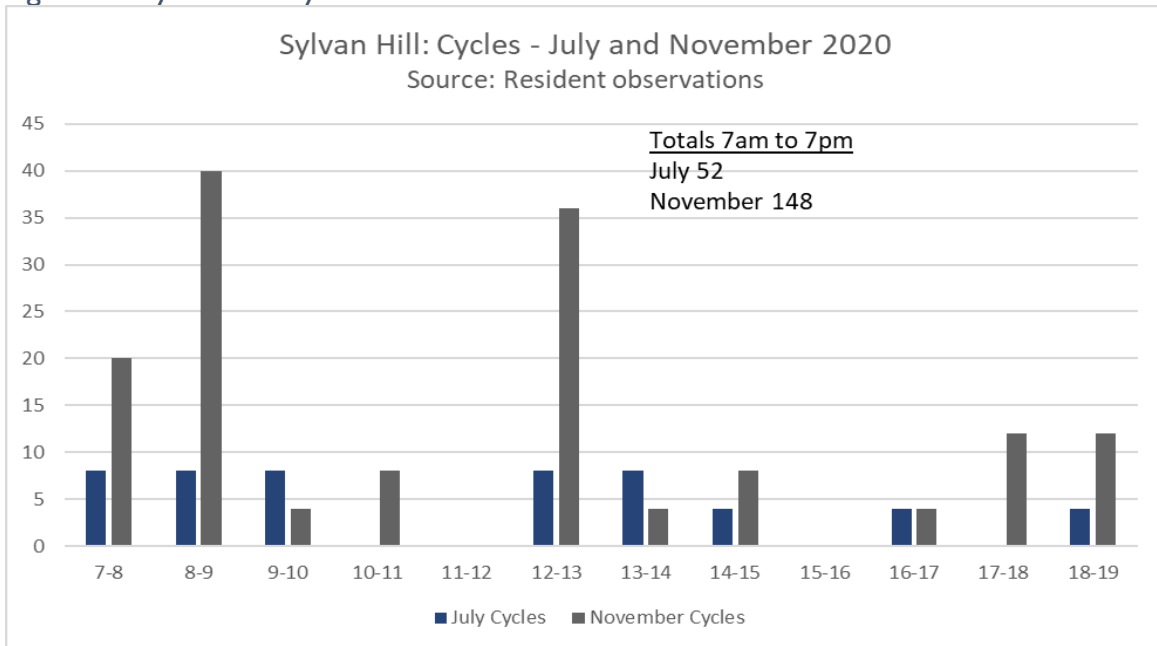


Figure 15 below shows the results of a pedestrian and cycle count at the Sylvan Hill/Auckland Road crossroads. There is no July data, but the results are nonetheless

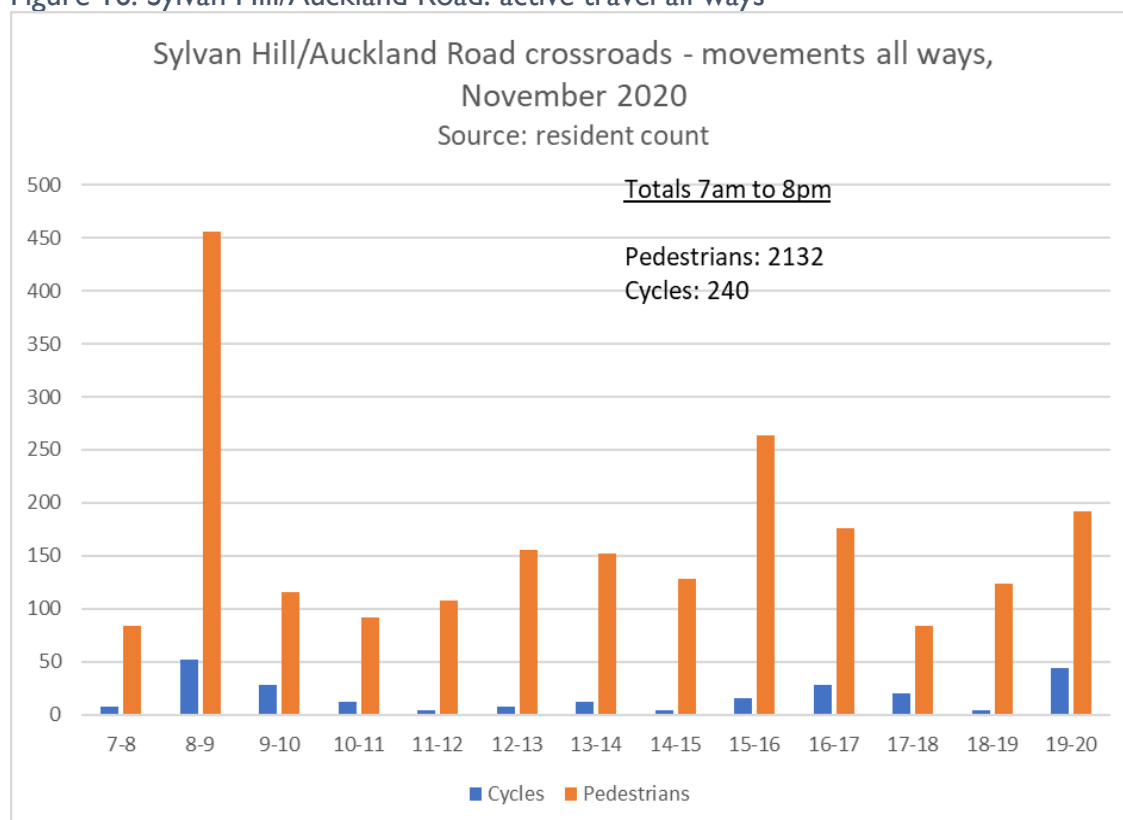
informative: some 240 cyclists passing through the junction during the course of the day, or around one every three minutes; and over 2100 pedestrians passing through the junction. As with the Sylvan Hill count, several hundred of these movements are of Harris students, but there is an enormous amount of general footfall at this location too.

The figures show the importance of Sylvan Hill and Sylvan Road as the main pedestrian access for HCACP students. Sylvan Hill is now a much safer environment for these high volumes of young pedestrians. It is possible to maintain social distancing because stepping in the road (with care) is now possible when it was impossible when the road was carrying several hundred vehicles an hour at peak times. Another important walking route to the school — from Anerley Road, via Hamlet Road and Maberley Road — is likewise much safer, since there is much less traffic using Hamlet Road.

The usefulness and safety of the designated cycle route through the neighbourhood (see pages 5 and 7 above) is much improved. This is reflected in the higher cycle numbers in the November traffic counts. A number of residents in middle or later years have commented that they have been able to cycle more, or resume cycling after having been frightened into stopping, and are consequently using bikes for local journeys which they would previously have made by car.

“I am back on a bike after over three years of being scared off by dangerous traffic. With other filtered streets in South Norwood and Woodside, it is now possible to ride most of the way into Croydon on a regular trip for which I used to drive. I am also now doing my weekly supermarket shop by bike, rather than car. I enjoy my rides and feel fitter.” (Resident, 50s)

Figure 16: Sylvan Hill/Auckland Road: active travel all ways



Public Transport

The 410 bus was previously affected adversely by congestion in Hamlet Road and Southern Avenue and had to negotiate stretches of road narrowed by parked cars with high volumes of opposing traffic. It can now pass through the neighbourhood with a minimum of conflict and delay and does not have to queue to join the main roads.

Active travel for disabled people

Much commentary on LTNs seems to rest on an assumption that the only way people with limited mobility can get around is by motor vehicle. In fact, people with limited mobility travel less by car than the rest of the population, both as drivers and passengers.³⁵ At least as much as everyone else in society, disabled people get around by a variety of means other than motor vehicles. Contrary to the stereotypes, many people with limited mobility can and do walk, often using aids like walking sticks and rollators, often with limitations on how far and fast they can go. People who cannot walk much, or at all, can likewise travel by a variety of means: manual or powered wheelchairs, or mobility scooters, most obviously. Contrary to much received wisdom, many disabled people can and do cycle, either on conventional bikes or a variety of adapted manual or e-assist bikes.³⁶ Like everyone else, most people with limited mobility use a variety of means of transport, depending on the length and nature of their journey and personal preference.

None of the non-car options are, of course, adversely affected by a Low Traffic Neighbourhood. Indeed, they are likely to be safer and more pleasant than in other neighbourhoods with high volumes of rat-running traffic. Tasks like crossing roads when there is a lot of traffic are much more difficult for disabled people walking or using mobility devices, because they usually cannot move as quickly as other people. They are more likely, as a consequence, to have to extend their journey to find a safe place to cross. In many ways, moving around on streets in residential neighbourhoods with high volumes of traffic may be more difficult than on main roads, which are engineered with features like pedestrian crossings and refuges. These real difficulties aside, like other non-motor users of streets, disabled people's experiences of walking, cycling or travelling by chair or scooter in Low Traffic Neighbourhoods are likely to be healthier and more pleasant because of the much lower levels of fumes, noise and aggressive behaviour from drivers.³⁷

Well-being benefits

There are well-evidenced associations between low noise, good air quality and regular moderate exercise, and physical and mental health (see pages 2-4 above). While it is very early days, it is reasonable to assume that, if the LTN continues, its direct impacts will over time translate into substantial well-being benefits.

Enabling children to walk or cycle to school is hugely beneficial for children's mental and physical well-being.³⁸ Multiple studies have shown the benefit active travel can have on children's academic attainment and behaviour for learning, as well as allowing them to build in physical activity to the daily routine. Furthermore, setting up healthy travel habits in childhood and adolescence leads to healthier adult travel habits.³⁹

Women are more likely to be responsible for educational escort trips and are less likely to feel confident cycling on busier roads, especially when travelling with children.⁴⁰ Families with lower incomes are more likely to be dependent on walking and our most deprived communities are also up to six times more likely to see their children killed walking or cycling to school than our least deprived.⁴¹

Another reported benefit is sociability. In the quieter and less stressed streets, it is now possible to stop on the street and have a conversation with acquaintances or strangers. So long as socialising indoors remains restricted, this will be particularly important for maintaining social contact and hence well-being.⁴²

The impact of the LTN is most noticeable on the roads which were previously busiest – the Hamlet Road, Auckland Road and Lancaster Road north-south route, and the streets connecting it to the main roads. However, the benefits are also experienced by people not living on those streets:

- The other streets, estates and cul-de-sacs in the neighbourhood. Their residents use what were the busier roads to enter and leave the neighbourhood. Nearly half of them do not have access to a motor vehicle so will normally either be walking, cycling or using the 410 bus. They are enjoying greater safety and convenience.
- People living outside the LTN but who travel through it. As mentioned above, large numbers of HCACP students and staff travel to and from the school through the LTN. People living outside the LTN walk or cycle through it to access amenities including the public open spaces, doctors' surgery, and places of worship.

.

Negative impacts of the LTN

A variety of negative impacts have been observed or claimed. They are:

- Longer journeys and inconvenience for residents who need to drive, including disabled people.
- A reduction in social safety for pedestrians in the neighbourhood.
- Obstruction and delays to emergency vehicles.
- Diversion of traffic on to the Bromley side streets adjacent to the northern boundary of the LTN.
- Diversion of traffic on to the surrounding main roads, with consequent adverse impacts on air quality, footfall and economic vitality in the 'Triangle' town centre of Crystal Palace.
- Diversion of traffic through other side streets, west of Church Road and South Norwood Hill.

In this section we review each in turn.

Longer journeys and inconvenience for residents who need to drive

As implemented up to August 2020, it is indisputable that some driving trips have become longer. For example, a driving journey from Auckland Road just north of the Cypress Road junction to the Crystal Palace Triangle has increased from 0.8 miles to 1.4 miles. A journey from the same location to Croydon town centre has increased from about 3.5 miles to 5 miles. Especially at busy times, this may add appreciably to journey times. While the longer journey time might encourage some people to switch from private car to other modes, in line with the intention of the LTN approach, there is likely to be some genuine delay and inconvenience for, for example, key workers who need to drive for their work, and disabled people for whom a vehicle is the only feasible means of transport.

However, the option suggested in the consultation of allowing resident access controlled by ANPR would mitigate this adverse impact in many cases. The consultation is also proposing to move the bus gate on Auckland Road to a location which will allow motor access to the doctor's surgery from both directions.

Disabled people who need to drive for some or all journeys will have experienced some adverse impact because some trips within, in or out of the neighbourhood are somewhat longer than they were previously. However, all properties in the neighbourhood can still be accessed by vehicle. Any increased journey lengths for disabled people using vehicles need to be weighed up against the benefits of safer streets for disabled people travelling by other modes (see pages 24-5 above). If the current filters are replaced by ANPR-controlled access, there will be no adverse impact on disabled residents who use vehicles.

Social safety

Claims have been made on social media that the reduction in motor traffic has resulted in the streets becoming unsafe for pedestrians, in terms of vulnerability to street crime. In our view, this is implausible. Government street design guidance suggests that high traffic tends to be associated with higher fear of crime by pedestrians, while pedestrians generally feel safe where their route is overlooked by buildings, and other people are using the street.⁴³

Most or all of any walking trips along streets in the neighbourhood are continuously overlooked by buildings, and, as set out above, there have been dramatic increases in walking and cycling in the neighbourhood since the LTN measures were installed.

At the risk of stating the obvious, the greater risk to pedestrians, being hit by a motor vehicle, is now much reduced.

The LTN has not been in place long enough for any reliable before-and-after conclusions. But we observe that recorded crime in the square mile including the LTN has in fact fallen from around 850 a month in June and July to 669 in October.⁴⁴

Emergency services

We assume the council has included emergency services in the current consultation. Clearly, their feedback, based on their operational data, should be conclusive in determining whether the changes have adversely affected their performance. So far as we are aware, despite frequent scaremongering on social media, there is no evidence of any material impact on emergency service response. Before and after comparisons in the Waltham Forest mini-Holland suggested that there was little impact on emergency service response, indeed a slight improvement.⁴⁵ The London Ambulance Service said at its annual meeting, in relation to schemes across London, that they were “not aware of any LTNs that have led to any patient safety concerns or any significant delays.”⁴⁶

Emergency service vehicles can, of course, pass through the Auckland Road bus gate and, we assume, if necessary, could disregard the school street restriction on Cypress Road. If the council retains the LTN with Automatic Number Plate Recognition (ANPR)-controlled access at the current filters, there will, of course, be no reason why there should be any effect at all on emergency vehicles.

Diversion to Bromley streets

Some Bromley streets have unequivocally benefited from the LTN, certainly Hamlet Road. It no longer experiences high volumes of traffic, including long queues of standing vehicles eastbound. However, the closure of Croydon borough streets further south to through traffic means that the only route from Hamlet Road or Auckland Road to Church Road, avoiding the main A214, is via Belvedere Road, Cintra Park, Patterson Road and Milestone Road. Residents have reported increases in vehicle numbers on these streets, including, at times, standing traffic, and confrontations between drivers attempting to navigate between parked vehicles.

These streets certainly offer a route from the northern part of the LTN to Church Road without going on to the A214. They also offer a potential diversion northbound away from the A214 to Church Road. Observation of navigation apps suggests drivers are being routed away from the main road at times of high congestion, but not at other times. However, unlike the currently closed roads, they do not offer a useful diversion route for traffic heading towards Anerley Hill from Church Road, since Milestone Road can only be accessed after travelling all the way round the Triangle. Once a driver has reached the Westow Hill/Anerley Hill junction, continuing into Church Road and down Milestone Road would take much longer than simply continuing along the main road.

In September 2020, volunteers from Shape Better Streets carried out observations in these streets to assess the scale and nature of this problem. Their findings were as follows:

- There appears to be a morning peak between 8 and 9am, of around 250 vehicles in the hour, mostly uphill, taking the four observations together, though there clearly are significant upward spikes from time to time.
- It is highly likely that the reaction of navigation apps to congestion on Anerley Hill may contribute to the higher levels of traffic at this time. That said, observations at the Auckland Road junction suggest that around 40 % of uphill movements originate from the south, within the LTN, not from Anerley Road.
- At other times, including the evening peak, it looks like the traffic does not exceed 100 vehicles an hour and is often significantly less.
- Many more vehicles drive uphill than downhill, especially in the morning peak. Cycle and pedestrian movements are more balanced.
- From the data collected, a guesstimate of vehicles per day would be 1,000-2,000, compared with over 10,000 a day in the Croydon streets further south before the LTN was implemented. At worst, no more vehicles are using these streets than continue to use Auckland Road for access (Figure 12, page 20 above).
- At the morning peak, traffic levels are comparable, though somewhat lower, than those observed in Auckland Road and Sylvan Hill before the Croydon LTN was implemented. At other times, however, they are around 25 % or less of those observed in the Croydon streets.⁴⁷

There is clearly a relationship between traffic on these streets and congestion on Anerley Hill. At the time of the observations, there was frequent congestion at peak times in the northern part of Church Road, back from the temporary lights then in place at the Westow Street junction. This tended in turn to knock on to Anerley Hill, as one of the roads feeding into Church Road. With the removal of the temporary lights, congestion on Church Road and Anerley Hill has reduced significantly (see following sections). So, the frequency and impact of episodes of high traffic on these streets should reduce (Figure 17).

Figure 17: Milestone Road, reported location of high volumes of diverted traffic, view west to Church Road, 8.45am, 3 December 2020



If the council introduces ANPR access on the streets accessing Church Road further south, the element of traffic which is using these streets for journeys from the neighbourhood to Church Road should reduce.

It remains to be seen how far there will be a recurrence of heavy traffic phases on these streets with the nearby main roads now being clearer following the removal of the Church Road temporary lights. However, there would be better answers to tackling the problem than allowing far larger volumes of traffic to start rat-running again through the streets further south. For example, a further modal filter (fixed barrier or ANPR device) could be installed, or the section of Milestone Road nearest Church Road could be made one-way from Church Road only. We understand, of course, that such measures would be a matter for Bromley Council.

Diversion of traffic on to nearby main roads

The Low Traffic Neighbourhood approach, by design, seeks to end the diversion of traffic from main roads, which are designated and designed to carry high levels of traffic, on to other streets, which are not, with the consequences explained above (pages 10-19 above).

However, if the result were that the main roads became unacceptably congested, that would clearly be a significant consequence to weigh up against the benefits set out above.

Before examining the evidence on this point, it is important to emphasise that the Triangle, South Norwood town centre and the main roads approaching them have experienced frequent serious traffic congestion for decades. This congestion is a consequence of high volumes of motor traffic on roads laid out in the 19th century with no conception of use by motor vehicles, let alone at today's traffic levels. While for much of the 168 hours in a week, these roads can and do carry high volumes of traffic without significant congestion, they become busy at peak times, and are vulnerable to incidental disruptions, for example road works, breakdowns, obstructive parking or collisions.

Congestion during the experimental period

Assessing the impact, if any, of the LTN measures on nearby main roads during the experimental period is very problematic:

- There was a general rise in traffic across London as lockdown restrictions eased, from May through to October.
- From March to late October, Church Road was reduced to alternate one-way working at the junction with Westow Street, and the right turn normally permitted from Westow Street was not available. This was because a car had collided with and seriously damaged a building, which had to be supported by a large scaffolding installation. As lockdown eased, before the completion of the LTN in early August, this was already resulting in lengthy queuing traffic along Church Road in both directions.
- At times during the experimental period, there have also been road works at various locations, including on South Norwood Hill during August, on at least two occasions at the crossroads in South Norwood, at Crown Point, and at the junction of Crystal Palace Park Road and Thicket Road.

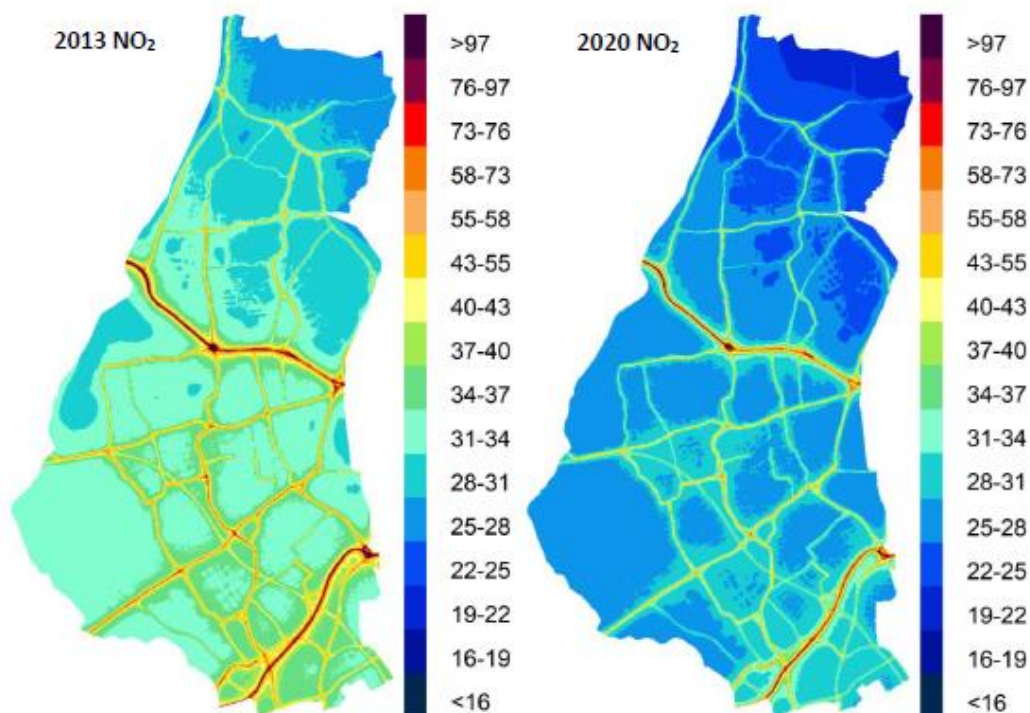
Aside from Church Road, which was badly affected by the alternate one-way restriction, it does not appear to us that, so far as one can generalise from the significant day-to-day variations, congestion on the main roads was any worse than it has been for many years. It would certainly go far beyond any evidence of which we are aware to suggest that vehicles no longer being able to drive through the LTN was decisive.

The removal of the scaffolding and one-way restriction in Church Road at the end of October made a big and immediate difference, however, to congestion in and around the Triangle. That suggests strongly that, to the extent vehicles are now using main roads which would otherwise have driven through the LTN, the main roads are able to carry the additional demand.

Air quality

Air quality on adjoining roads and in the two town centres is beyond doubt frequently poor. However, if, as we argue above, the heavy traffic and congestion which causes it cannot reliably be attributed to the LTN, opening the LTN roads again to rat-running would not assist. The Waltham Forest mini-Holland, including progressively rolling out LTNs, has reduced air pollution on 90 % of the borough's streets without worsening it on the main roads. (Figure 18)⁴⁸

Figure 18: Change in Nitrogen Dioxide emissions, Waltham Forest, 2013-2020



Local economy

Opponents of the LTN claim it has damaged the economy of the Triangle. Their chain of logic appears to be:

1. Businesses suffering loss of footfall and turnover, because:
2. Streets are unpleasant and access difficult for car-borne customers, because:
3. The Triangle and approaching main roads are congested, because:

4. The LTN has diverted traffic on to main roads.

We have seen nothing other than anecdote and assertion to support this line of argument. We have dealt above with the impact of the LTN on main road congestion (3 and 4). As for 1 and 2, so far as we are aware, only two retail or hospitality businesses have closed in the last six months. At weekends especially, the Triangle appears busy, in terms of walking footfall. Both closed premises have been taken over by new tenants. Despite the pandemic, several new businesses have opened in recent weeks. Tens of thousands of people live within walking distance; there are two nearby rail stations and numerous bus routes, and there is, so far as we know, no recent or reliable data on how customers travel to the Triangle. National research suggests retailers tend to over-estimate the proportion of customers travelling by car and under-estimate the proportion walking, cycling or using public transport.⁴⁹

It may be that some businesses are experiencing reduced footfall and turnover. However, aside from the implausibility of attributing traffic congestion to the LTN, there are many other current factors affecting customers' ability to spend and shopping choices, including uncertainty about employment and earnings, and reluctance to visit busy environments. Older residents in the LTN have commented to us that they feel unable to maintain social distancing using the narrow pavements in the Triangle, particularly since the removal of the temporarily widened footways installed in the spring.

Diversion of traffic into other residential neighbourhoods

We are aware of concern about rat-running in two nearby neighbourhoods, the streets between Beulah Hill and Central Hill, around Harold Road, and west of South Norwood Hill. In the latter area, the council has installed modal filters which prevent Holmesdale Road from being used for east-west motor journeys, but the north-south streets remain open.

Rat-running may well have been increasing in these neighbourhoods, for the same reasons it had been increasing in the LTN before its inception (see pages 10-19 above). We are not aware of any evidence that the introduction of the LTN has made a significant difference, on top of the other factors contributing to congestion on main roads. In any event, a more effective response than re-opening the LTN to rat-running would be to make these neighbourhoods LTNs as well. We understand that some residents are beginning to campaign for that.

Next steps

We hope and trust that, in the light of this submission and other contributions to the consultation, the council will decide to retain the LTN, with modifications.

We support the proposed re-siting of the bus gate to improve access to the doctors' surgery.

There are differences of view within our group about the respective merits of retaining physical barriers to vehicles and replacing them with ANPR-controlled access. As a group, we are content for the council to make that judgement, on the basis of the views of residents and the reasons they give for them. Both approaches would bring about the important result, which is a continuation of the reduction in vehicle movements brought about by the LTN.

If the LTN is retained, there will need to be strong communication with residents and others about the following:

- If the decision is to proceed with ANPR access, the location of 'gates', and how to obtain permits. The routes which will be open to those without permits should be well publicised and signed.
- Encouraging further increased take-up of cycling. From what we can see, there is not enough awareness either outside the LTN of the safe, pleasant, cycling routes which have now been opened up, nor inside and outside the LTN about how, combined with other measures along Holmesdale Road and Albert Road, it is now possible to ride most of the way to Croydon town centre with minimal use of busy main roads.
- Continued explanation of the intent and benefits of LTNs, and myth-busting.

As a group, we offer our support to work alongside the council in these communication challenges.

It is regrettable that relationships between the two neighbouring boroughs, Croydon and Bromley, have not been managed well. Neither council emerges with much credit from recent history. We hope that they will now start to co-operate to the benefit of residents, who are very much part of one community, whichever side of the boundary they happen to live. In particular, there should be continuing engagement with residents of Belvedere Road and other streets which have experienced periodic spikes of rat-run traffic and dangerous driving, to find a solution. We hope that the newly established cross-boundary councillor group can assist with this.

We do not accept that the LTN has worsened, or will, worsen congestion, air quality, traffic danger or other characteristics of surrounding main roads and town centres. If anything, the behaviour change which it is intended to bring about should help by encouraging shift from private cars to other modes. However, that does not alter the fact they have been for many years, and, without action, will continue to be, poor environments for people living and travelling on them by active modes. We encourage the council to develop plans to improve them, working with other boroughs around the Triangle. Again, the councillor forum is a good platform for making this happen.

Conclusion

Over the last decade, rat-running in the neighbourhood has increased to the point where it has been having a completely unacceptable impact on residents' health and quality of life, because of air quality, noise, and traffic danger. These impacts affected the whole neighbourhood, not just the busy streets, since the latter are the main access routes from anywhere in the neighbourhood to nearby main roads and amenities. Over 40 % of households do not have access to a vehicle, so were experiencing nothing but detriment from uncontrolled motor vehicle access through the neighbourhood.

Traffic levels also made active travel unpleasant and unsafe, for residents and those passing through on foot or cycling. There could be no realistic prospect of the Lancaster Road/Auckland Road cycle route being brought up to the required London standards without either suppressing motor vehicle use of it, or engineering solutions such as cycle lanes and junction improvements which would both be hugely costly and not achievable without removing all or most on-street parking.

Safe active travel through the neighbourhood is critical, not only as a means of maintaining a decent cycling network in the borough, but as a means of enabling local families, inside and nearby the LTN, to use active travel to access the park, their children's school and other services and amenities.

The global climate emergency, and the weight of national, London and local policy on air quality, public health and local transport all point overwhelmingly towards the adoption of measures such as those put in place or now proposed for the LTN. Though far from perfect, the experimental scheme has shown that the approach can produce strong improvements in local health and well-being, and, only three months on, has produced very significant increases in active travel.

By contrast, the claims of opponents about the adverse consequences of the scheme are almost entirely based on assertion and anecdote. The concerns which are more credible: disproportionate diversions for residents who need to use vehicles, including disabled residents, and the intermittent heavy traffic on some of the Bromley streets, can be addressed effectively without reopening the whole neighbourhood to rat-running.

If the LTN trial is removed, we can expect traffic volumes and speeds once again to return to levels which would have huge adverse impacts on residents' health and well-being and make healthy travel choices less convenient, less attractive and less safe.

Children and young people cannot vote and families with young children are often least able to participate in debate around local issues. These voices are so often lost in our local decision-making processes. They must not be ignored.

The streets in the LTN can either be a pleasant, safe neighbourhood to live, and an active travel corridor. Or they can be a congested, polluted, dangerous, bypass for the Triangle and the main roads. They cannot be both. There is no credible basis for the council choosing the latter.

References

- ¹ Facts about the Climate Emergency, UN Environment Programme <https://www.unenvironment.org/explore-topics/climate-change/facts-about-climate-emergency>
- ² Air pollution 'costs UK economy £54 billion a year', airqualitynews.com, [https://airqualitynews.com/2015/04/28/air-pollution-costs-uk-economy-54-billion-a-year/#:~:text=Indoor%20and%20outdoor%20air%20pollution,Organisation%20today%20\(April%202028\).](https://airqualitynews.com/2015/04/28/air-pollution-costs-uk-economy-54-billion-a-year/#:~:text=Indoor%20and%20outdoor%20air%20pollution,Organisation%20today%20(April%202028).)
- ³ Air quality, Taskforce for Lung Health <https://www.blf.org.uk/taskforce/data-tracker/air-quality/pm25>
- ⁴ Understanding the Health Impacts of Air Pollution in London, Heather Walton et al, King's College London, July 2015, p8
- ⁵ Study estimates exposure to air pollution increases COVID-19 deaths by 15% worldwide, European Society of Cardiology, 27 October 2020 <https://www.escardio.org/The-ESC/Press-Office/Press-releases/study-estimates-exposure-to-air-pollution-increases-covid-19-deaths-by-15-world>
- ⁶ Why children die – research and recommendations (2014), Royal College of Paediatrics and Child Health <https://www.rcpch.ac.uk/resources/why-children-die-research-recommendations>
- ⁷ Health Impacts of Cars in London, Mayor of London, September 2015
- ⁸ Mayor's Transport Strategy, Mayor of London, March 2018, p17
- ⁹ Health Impacts of Cars in London, Mayor of London, September 2015, p1
- ¹⁰ £2 billion package to create new era for cycling and walking, Department for Transport, 9 May 2020 <https://www.gov.uk/government/news/2-billion-package-to-create-new-era-for-cycling-and-walking>
- ¹¹ Traffic Management Act 2004: network management in response to COVID-19, Department for Transport <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>
- ¹² Public Opinion Survey on Traffic and Road Use, Kantar, for Department for Transport, November 2020,
- ¹³ Coronavirus: Will traffic in London double as lockdown eases?, Tom Edwards, BBC, 9 June 2020 <https://www.bbc.co.uk/news/uk-england-london-52964751>
- ¹⁴ London Mini Hollands: Building Dutch-style cycle infrastructure in outer London boroughs, Department for Transport, 7 February 2020 <https://www.gov.uk/government/case-studies/london-mini-hollands#:~:text=A%20study%20investigating%20the%20early.have%20not%20yet%20been%20made.>
- ¹⁵ Low Traffic Neighbourhoods: what is the evidence from the mini-Holland interventions? Rachel Aldred, 1 September 2020, <http://rachelaldred.org/research/low-traffic-neighbourhoods-evidence/>
- ¹⁶ Health benefits: Walking and cycling is good for you...here's why, Enjoy Waltham Forest <https://enjoywalthamforest.co.uk/about-mini-holland/>
- ¹⁷ Health matters: obesity and the food environment, Public Health England, 31 March 2017
- ¹⁸ Every Child a Healthy Weight: Ten Ambitions for London, London's Child Obesity Taskforce, Greater London Authority, 2019, p30
- ¹⁹ National Travel Survey 2014: Travel to school, Department for Transport
- ²⁰ Croydon to declare climate emergency, Croydon Council, 8 July 2019 <https://wp.croydon.gov.uk/newsroom/croydon-to-declare-climate-emergency/>
- ²¹ Croydon's climate commission sets out focus for tackling climate change, Croydon Council, 21 May 2020 <https://news.croydon.gov.uk/croydons-climate-commission-sets-out-focus-for-tackling-climate-change/>
- ²² Recommendations from Citizen's Assembly on Climate Change, paper for Croydon Cabinet, 8 June 2020, paragraph 4.1
- ²³ INRIX Global Traffic Scorecard: Congestion cost UK economy £6.9 billion in 2019, INRIX <https://inrix.com/press-releases/2019-traffic-scorecard-uk/>
- ²⁴ Air Quality Action Plan 2017-22, Croydon Council, Table 4.1
- ²⁵ On our Bikes: Realising Croydon's cycling potential, Croydon Cycling Strategy 2018-202, Croydon Council, 2017
- ²⁶ Space4Cycling Campaign – 2014 Local Elections, Croydon Cycling Campaign <https://croydoncyclists.org.uk/index.php/2014-borough-elections/>
- ²⁷ Labour's plan for Croydon: #Ambitious4Croydon, Croydon Labour Party, 2018, p11, p21.
- ²⁸ Our Corporate Plan for Croydon 2018-22, Croydon Council, p19, p25
- ²⁹ Derived from Ministry of Housing, Communities and Local Government, Index of Multiple Deprivation, and London Datastore, Super Output Area Population (LSOA, MSOA), London
- ³⁰ All data can be downloaded from Crystal Palace LTN website *Traffic surveys* <https://crystalpalaceltn.org/2020/08/29/traffic-survey/>

-
- ³¹ TfL data, quoted in *Crystal Palace traffic – what are the facts and what’s to be done?*, Tom Chance, <http://tomchance.org/2020/11/07/crystal-palace-traffic-what-are-the-facts-and-whats-to-be-done/>
- ³² *London Cycling Design Standards*, Chapter 2, p31
- ³³ Source: Crashmap
- ³⁴ *Traffic Survey, Crystal Palace LTN* <https://crystalpalaceltn.files.wordpress.com/2020/09/traffic-survey.pdf>
- ³⁵ *National Travel Survey, 2019*, Department for Transport
- ³⁶ *Wheels for Wellbeing* <https://wheelsforwellbeing.org.uk/>
- ³⁷ *Low Traffic Neighbourhoods: Disabling or enabling*, Crystal Palace LTN <https://crystalpalaceltn.org/2020/08/29/low-traffic-neighbourhoods-disabling-or-enabling/>
- ³⁸ *Exercise and Mental Health: for young people*, Royal College of Psychiatrists <https://www.rcpsych.ac.uk/mental-health/parents-and-young-people/young-people/exercise-and-mental-health-for-young-people>
- ³⁹ *Briefing Paper: How can active travel enhance educational attainment in school children?* Dr Darshana Bhattacharjee, Bristol City Council, April 2015
- ⁴⁰ *Inclusive city cycling - Women: reducing the gender gap*, Sustrans, June 2018
- ⁴¹ *Reducing unintentional injuries on the roads among children and young people under 25 years*, Public Health England, June 2014, p9-10
- ⁴² *Social connections and the brain: Age UK* <https://www.ageuk.org.uk/information-advice/health-wellbeing/mind-body/staying-sharp/looking-after-your-thinking-skills/social-connections-and-the-brain/>
- ⁴³ *Manual for Streets*, Department for Transport, 2007, p67
- ⁴⁴ UK Crime Statistics, search on SE19 2DH
- ⁴⁵ *The urgent case for more walking and cycling in the UK*, Walking and Cycling Alliance, November 2020, p12.
- ⁴⁶ Ibid
- ⁴⁷ *Impact of Crystal Palace LTN on adjacent streets in Bromley*, Crystal Palace LTN <https://crystalpalaceltn.org/2020/09/23/impact-of-crystal-palace-ltn-on-adjacent-streets-in-bromley/>
- ⁴⁸ *Air Quality: concentrations, exposure and attitudes in Waltham Forest*, David Dajknak et al, King’s College London, p7-9
- ⁴⁹ *Shoppers and how they travel*, Sustrans, 2006



HOUSE OF COMMONS
LONDON SW1A 0AA

Katherine Kerswell
Chief executive
London Borough of Croydon
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

December 17th

Dear Katherine Kerswell,

Initially, I wrote to Croydon Council on the 27th July to raise concerns about the impact of the LTN scheme. I also spoke to the former Croydon Cabinet Member for transport and expressed my deep concerns with the scheme, as well as having written to the Secretary of State for Transport to raise my concerns and request any further assistance he can provide. Unfortunately, this matter remains a major issue locally - my constituents have continued to be impacted with reports of increased road rage, traffic and road closures.

London Borough of Bromley challenged the legality of the LTN scheme, due to the failure of Croydon to consult with LBB before implementing the scheme. I welcomed the news that Croydon Council allowed a formal consultation on the final agreed proposals, allowing residents to comment formally on the proposals. However, I was disappointed to have been informed last week that the consultation was extended by another 14 days as local businesses were not included in the first consultation. It is right that local businesses are consulted, but I had hoped that this would have been done at the outset. The consultation, therefore, ends on Friday and the outcome will not be known until early January causing further delay and distress to those affected.

My view remains unchanged, I believe that if a better scheme can work for both Boroughs, it should be trialled first. If this isn't possible then the current roadblocks should be voted out and the idea abandoned as it simply has not worked in practice.

There is a great strength of feeling on this issue and I have heard from residents about the significant impact that this is having on their lives.

I, therefore, ask again, that if a new scheme is voted for it is first tested in the community to establish it's efficiency. If this can not happen I would welcome the LTN zone being removed due to the impact on Bromley residents.

I request my views are formally submitted in the consultation and would greatly appreciate an update on the outcome in January.

Best wishes,

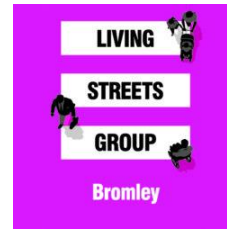
A handwritten signature in black ink that reads "Ellie Reeves".

Ellie Reeves
Member of Parliament for Lewisham West and Penge

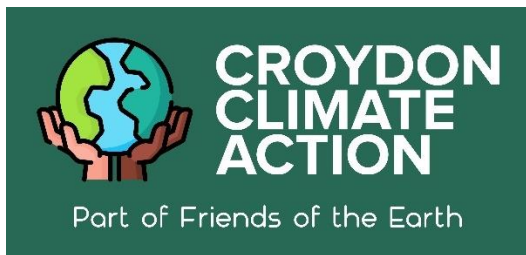
SHAPE BETTER STREETS

Submission by Crystal Palace and South Norwood Shape Better Streets

Supported by



friends of the earth
Croydon



Your voice for a cycling borough



Who we are

Shape Better Streets is a resident campaign supporting the principle of a Low Traffic Neighbourhood in Crystal Palace and South Norwood. Our website address is: <https://crystalpalaceln.org/> and our email address is CrystalPalaceLTN@gmail.com.

Bromley Cyclists forms part of the London Cycling Campaign - a group which campaigns for better cycling facilities and promotes cycling to all Londoners

Bromley Living Streets is a group of residents in the London Borough of Bromley, campaigning for safer, quieter, low-traffic neighbourhoods which encourage walking and cycling.

Cadence is a cycling hub open to every level of bike rider. We describe ourselves as being 'more than a bike shop and more than a club'.

Croydon Cycling Campaign is a group of Croydon locals who want to see Croydon transformed into a city that is welcoming to cyclists of all ages and abilities. We work with the council to encourage high quality provision for cycling, organise rides and socials and campaign tirelessly for a real cycling revolution.

Friends of the Earth Croydon is part of a national and international community dedicated to protecting the natural world and the wellbeing of everyone in it. We lead campaigns, provide resources and information and drive real solutions to the environmental problems facing us all.

Croydon Climate Action, founded in 2019, works in partnership with Croydon Friends of the Earth specifically to work on local campaigns relating to climate change. We are a group of passionate individuals who work with local councils, businesses, schools and communities to ensure the future of Croydon is climate-friendly.

Croydon Living Streets is a group of volunteers working to make everyday walking safer, easier and more enjoyable across our community.

Holmesdale Community Action Group is a community group bringing neighbours together who are dedicated to making our local area a safer, cleaner and better place to live.

Labour Cycles is a community of Labour members committed to ensuring active travel is the for the many, not the few.

London Cycling Campaign is a 11,500-strong membership charity, making sure that everyone who cycles, or wants to cycle, has a voice in Greater London.

Peddle My Wheels is a circular economy business that aims to make cycling accessible and affordable for everyone.

Key points

- The climate crisis, national and local policy all call for a local approach based on reducing private vehicle use and the air quality, noise and traffic danger it creates, to make neighbourhoods safe and pleasant and encourage active travel.
- The LTN experiment should therefore only be abandoned if there is strong evidence that any harms significantly outweigh the benefits and cannot be mitigated by changes to the scheme.
- Over the last decade, traffic volumes on some streets in the neighbourhood have more than doubled – to 12,000 movements a day, based on January 2019 data – comparable or more than some nearby main roads. This is consistent with the increase in vehicle use seen in London over recent years, which has almost all taken place on streets which are not part of the main road network.
- The majority of people rat-running through the neighbourhood have been flouting the law by exceeding speed limits and other dangerous and anti-social behaviour.
- The increase in traffic has led to completely unacceptable consequences for air quality, noise, and danger, especially for active travel. It has degraded the neighbourhood as a place to live. The official London cycling route through the neighbourhood was experiencing levels of traffic far higher than TfL's standards for back street, "quiet" routes without formal cycling infrastructure.
- The experimental LTN has, in only three months from inception, led to at least a two thirds reduction in vehicle traffic, with accompanying reductions in air pollution, noise and traffic danger, and a tripling of walking and cycling.
- The main genuine problem which has emerged is some increase in traffic on adjoining streets in the borough of Bromley – though on nothing like the scale previously experienced in the streets where LTN measures have been installed. This has eased, as a result of Church Road reverting to normal working. If the scheme changes to allow resident access from Church Road further south, it should reduce further traffic on these streets. If there continued to be a problem, it could be addressed without allowing 10,000 or more vehicles a day back on to Auckland Road and other streets.
- There is a complete lack of objective evidence for other claimed disbenefits – emergency services access, social safety, increases in congestion and pollution on surrounding roads, and damage to the Triangle town centre economy. The improvement in local congestion following the removal of the restriction in place on Church Road from March to October shows clearly that the LTN has not had an unacceptable impact on local main road capacity. Main roads remain congested at times, and hostile environments for active travel, as they have been for decades. That can and should be tackled as an issue in its own right.
- The streets in the LTN can either be a pleasant, safe neighbourhood to live, and an a quiet, safe, attractive corridor for active travel away from main roads. Or they can be a congested, polluted, dangerous, bypass for the Triangle and the main roads. They cannot be both. There is no credible basis for the council choosing the latter.

Policy context: Global, national, London

Climate Crisis

The world is experiencing a climate crisis, with 2019 concluding a decade of exceptional global heat, retreating ice and record sea levels driven by greenhouse gases produced by human activities. To prevent warming beyond 1.5 °C (the recognised limit for land and sea to cope is 1.5-2 °C), we need to reduce emissions by 7.6 % every year from this year to 2030.¹

The 2015 Paris Agreement was drawn up to limit global temperature rise to no more than 2° C above pre-industrial levels but also offered national pledges for countries to cut or curb their greenhouse gas emissions by 2030. The initial pledges are already insufficient to meet the target.²

Air Quality

The World Health Organisation estimates that air pollution costs the UK economy approximately £54 billion a year. This accounts for 3.7 % of GDP in Britain.³

Up to 36,000 deaths every year are linked to air pollution in the UK (based on figures from 2010-2017) and over 35 % of local authorities (including more than 22 million people) had areas with unsafe levels of fine particulate matter (PM_{2.5}) in 2018.

More locally, Transport for London (TfL) has undertaken research into the economic costs of the health impacts caused by air pollution in London. The research estimates an annual economic cost of up to £3.7 billion, made up of the cost of treatment, lost work hours and concern and inconvenience to family members.⁴

There is growing evidence of a link between poor air quality and vulnerability to COVID-19. A recent study estimated that about 14 % of deaths in the UK from COVID-19 – some 6,100 to date – could be attributed to long-term exposure to air pollution.⁵

Traffic and Travel

Congestion cost the UK economy £6.9 billion in 2019 and on average, UK road users lost 115 hours and £894 a year to congestion⁵. In terms of the human cost, over three quarters of deaths due to injury in the age bracket of 10–18-year-olds are related to traffic incidents.⁶

2,324 people were killed or seriously injured (KSI) on London streets in road traffic collisions in 2013. There are an estimated 5,900 deaths per year in London due to long-term exposure to NO₂, and 3,500 deaths due to long-term exposure to fine particulate matter (PM_{2.5}).⁷

London's population is projected to increase by 24 % by 2041. With this expansion, rising public transport demand means that, without further action, the majority of morning peak travel on both National Rail and London Underground would be in crowded conditions.⁸

The Mayor of London's own transport strategy is very clear on what action needs to be taken:

"At its heart is a bold aim for 80 % of all trips in London to be made on foot, by cycle or using public transport by 2041."

Private vehicle use is certainly not the answer to the public transport crisis. Household car ownership in Greater London is significantly lower than the average in England. In addition, over one third of all the car trips made by London residents are less than 2 km and could be walked in up to 25 minutes. Habit strongly influences the choice of travel mode.⁹

The Impact of COVID-19

Following unprecedented levels of walking and cycling across the UK during the pandemic, the Department for Transport (DfT) published plans to help encourage more people to choose alternatives to public transport when they need to travel. This should make it easier to follow healthier habits, and make sure the road, bus and rail networks are ready to respond to future increases in demand.¹⁰

In May 2020 the Emergency Active Travel Fund was formally announced. It supports local authorities to develop cycling and walking facilities and projects such as Low Traffic Neighbourhood schemes (LTN schemes). The accompanying Department for Transport guidance, reaffirmed and updated in November 2020, urges highways authorities to implement measures to reduce rat-run traffic on minor roads:

*"Modal filters (also known as filtered permeability); closing roads to motor traffic, for example by using planters or large barriers. Often used in residential areas, when designed and delivered well, this can create low-traffic or traffic-free neighbourhoods leading to a more pleasant environment that encourages people to walk and cycle, and improving safety."*¹¹

Survey results show clear support for these initiatives:

- Respondents overwhelmingly agreed that the government should act in local neighbourhoods to increase road safety (88 %), improve air quality (86 %), reduce traffic congestion (83 %) and reduce traffic noise (75 %).
- Three quarters of respondents supported the reduction of road traffic in towns and cities in England (77 %) and their local area / neighbourhood (78 %), and two thirds of respondents were supportive of reallocating road space to walking and cycling across towns and cities in England (66 %) and their local area / neighbourhood (65 %).¹²

In London particularly, where public transport use is usually high, the need was critical. TfL warned that due to social distancing, capacity on the Tube would be reduced to 15–20 % and 20–25 % on buses. If nothing was done, TfL's own modelling showed a doubling of car use in central London, assuming a third of pre-lockdown journeys returned and those who cannot get on to public transport shifted to cars.¹³

Mini-Hollands – the evidence from schemes in place

This national and London policy emphasis reflects evidence from pathfinder mini-Holland schemes. A study investigating the early impact of the mini-Holland schemes in Waltham Forest discovered that people in areas with active travel schemes were 24 % more likely to

have done any cycling in the previous week and walked or cycled for 41 minutes per week more than those where such improvements have not yet been made.¹⁴

More recent research has consistently found that living near interventions has led to a 40–45-minute weekly increase in active travel, providing confidence that even in more car-dependent, suburban areas, active travel infrastructure can spur take-up, and that such growth can provide high health economic benefits in relation to intervention costs. There is also a consistent trend towards people in the LTN area being less likely to own a car, with the largest decrease in car use always within the LTN group.¹⁵

Public Health

It is estimated that more than 14 % of children age 11 are overweight and more than 23 % are obese. Countries with the highest levels of cycling and walking generally have the lowest obesity rates. People who cycle live two years longer on average than people who do not and take 15 % fewer days off work through illness.¹⁶

The total cost of obesity to wider society is estimated at £27 billion. The UK-wide NHS costs attributable to excessive weight and obesity are projected to reach £9.7 billion by 2050, with wider costs to society estimated to reach £49.9 billion per year.¹⁷

The Mayor of London's Childhood Obesity Taskforce has called for a rapid increase in the number of 'public realm improvements that reduce traffic and support children's health, well-being and mobility' as one of its 10 ambitions for tackling childhood obesity in the capital.¹⁸

Children and School Travel

With the 'school run' a key contributor to rush hour traffic, this seems an easy target to reduce private car use, particularly given the potential benefits in health for the younger generation.

- 76 % of trips to school made by primary school children are under 2 miles, compared to 49 % of trips to school made by secondary school children. For secondary school children, trips to school are more likely to be between 2 and 5 miles (29 %).
- 88 % of children aged 7 to 10 were usually accompanied to school by an adult in 2013, this proportion drops to 31 % for children aged 11 to 13.
- 43 % of children are accompanied to school because of fear of road danger.¹⁹

If only a small fraction of these journeys were converted to active travel, it would have a huge positive impact on by reducing the volume of vehicular traffic on our roads.

Policy context: Croydon

Local policy and strategies on climate, transport and public health all point clearly towards reducing motor vehicle use and encouraging active travel.

Climate

In June 2019 Croydon Council declared a climate emergency, with an ambitious target of ensuring the borough is carbon neutral by 2030.²⁰ It has set up a Climate Crisis Commission, one of whose workstreams is on transport and energy.²¹ A Citizen's Assembly sponsored by the council and operating in early 2020 said "we want to see fewer cars in total on the borough's roads with shorter journeys in particular being cut."²²

Air Quality

In Croydon alone, background concentrations of PM_{2.5} have been measured as dangerous and in breach of World Health Organisation (WHO) limits. In 2018 an estimated 6.16 % of deaths in the borough were attributable to PM_{2.5} air pollution which was equivalent to 151.5 deaths.²³ Croydon's Air Quality Management Plan includes a commitment to reprioritise road space to enable walking and cycling.²⁴

Active travel

Croydon has developed a strong policy commitment to active travel in recent years. The 2018-23 Cycling Strategy, published in 2017, set out an approach, including establishing an inclusive cycling culture and establishing safe routes. One of the routes earmarked for improvement was the long-standing London Cycle Network route along Lancaster and Auckland Roads.²⁵ The Croydon Cycling Campaign has been arguing for several years that it should be improved by cutting rat-run traffic.²⁶

The controlling Labour Group's 2018 manifesto made strong commitments on active travel, with a particular focus on children and young people – to support initiatives "that encourage children to walk and cycle to school" and to put in place an approach to transport which "enable[s] people to get out of their cars... work[s] to achieve the principles of Vision Zero ...and makes Croydon... easy to get around and enjoy, especially for young people, older people and disabled residents."²⁷ These commitments are reflected in the council's current corporate plan.²⁸

How the policy context should shape a decision

The weight of national, London and local policy points overwhelmingly to the need to reduce motor vehicle use and encourage active travel. It also points to the importance of creating low-traffic environments in which the air and noise pollution associated with excessive traffic is removed, and in which active travel is encouraged.

That does not, of course, justify persisting with a particular scheme if it does not achieve these objectives, or results in significant unintended adverse consequences. But it does point strongly towards only abandoning a scheme if:

- there is clear evidence that the harm outweighs the benefits;

and

- any harm cannot be addressed by modifications to the scheme.

Our argument is:

- The scheme has resulted in very significant benefits.
- There are some harms, but many of the claims which have been made about adverse consequences are, at best, exaggerated, and in some cases are not supported at all by the evidence.
- Changes to the scheme could reduce the genuine harms significantly.

About the Crystal Palace and South Norwood LTN

Geography

The neighbourhood in which the LTN has been established is, in formal terms, the parts of Croydon's South Norwood, and Crystal Palace and Upper Norwood, wards bounded by: the A213 South Norwood High Street; the A215 South Norwood Hill; the A212 Church Road; the boundary with Bromley; and the railway line between Crystal Palace and Norwood Junction,

However, part of the boundary with Bromley does not follow any strong natural features, and a wider definition of the neighbourhood would extend to the A214 Anerley Hill and Anerley Road.

On this broader definition, the neighbourhood is about a mile and a half north to south, and around half a mile wide.

The neighbourhood occupies the eastern slopes of the southern end of the Norwood Ridge. Broadly, the difference in elevation between Church Road and South Norwood Hill on the western boundary of the neighbourhood, and the lower lying streets is greatest (around 50 m of elevation) towards the northern end, and less or negligible towards the south. A road, called successively Lancaster Road, Auckland Road and Hamlet Road, runs through the neighbourhood from south to north. Various streets run west from it to South Norwood Hill and Church Road. There are networks of streets east of it, to the south around Warminster Road, and to the north round Sylvan Road and Maberley Road. Travel (by any mode) to the east is completely blocked by the railway line, which can only be crossed on the main roads at the northern and southern ends of the neighbourhood. The Auckland Rise estate occupies a substantial area east of Church Road and south of Sylvan Hill, and there is a significant amount of social housing on the Bromley side, between Anerley Road and Belvedere Road.

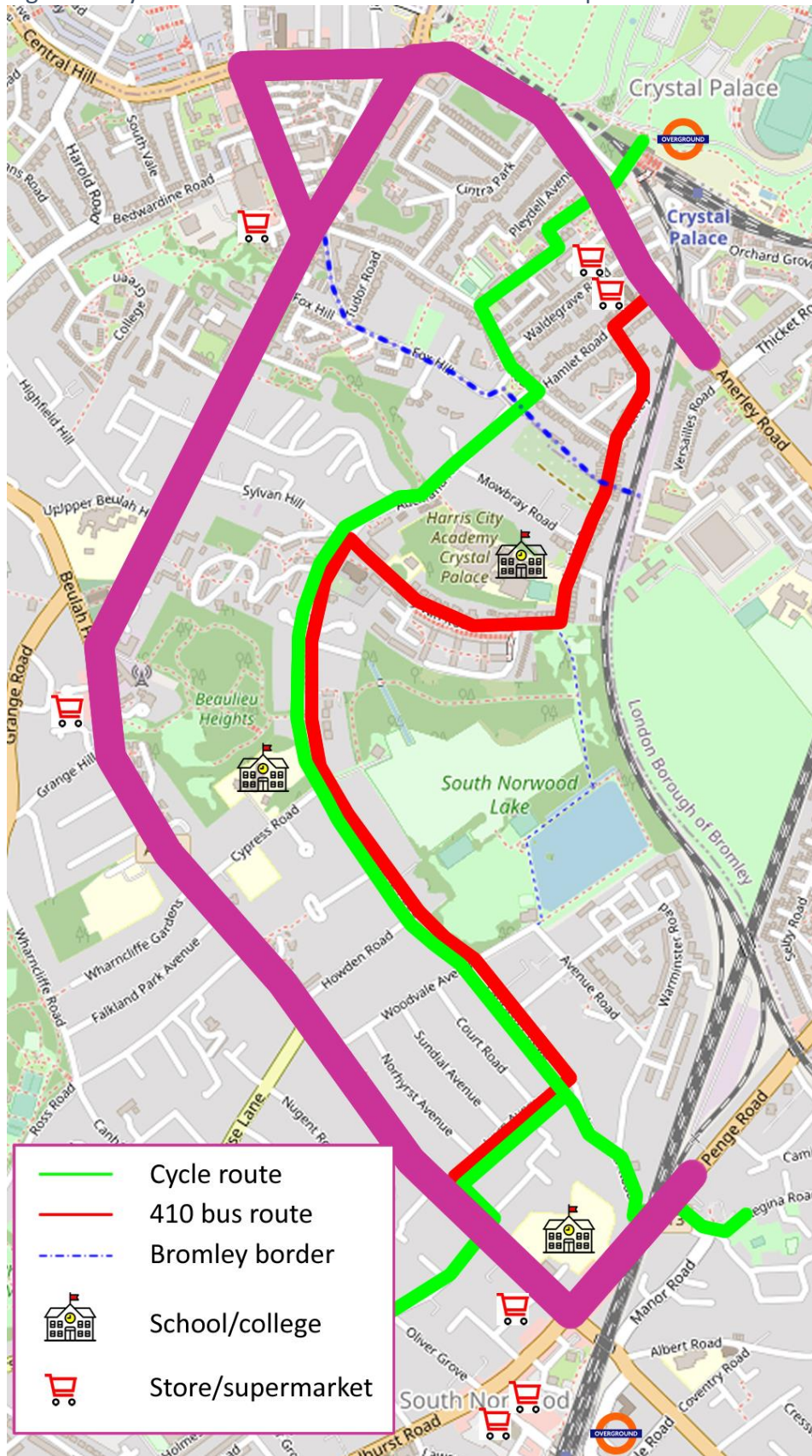
There are several areas of public open space in the neighbourhood, principally South Norwood Lake and Grounds, Beaulieu Heights and Stambourne Woodland.

There is one primary school in the neighbourhood (Pegasus Academy Cypress School), and two secondaries: Harris City Academy Crystal Palace towards the north, and Harris South Norwood on the South Norwood Hill boundary road at the southern end. There is a community centre (Waterside) adjacent to the South Norwood Lake.

There are railway stations (Norwood Junction and Crystal Palace) close to the northern and southern ends of the neighbourhood. Buses run along the main roads bounding the neighbourhood, and there is a service (410) running through the neighbourhood itself from south to north via Southern Avenue, Lancaster Road, Auckland Road, Sylvan Road, Maberley Road and Hamlet Road. A long-standing London Cycle Network route runs through the area along Lancaster Road, Auckland Road, Belvedere Road and Chipstead Close.

Figure 1 is a map of the area.

Figure 1: Crystal Palace and South Norwood LTN: Map



Demography

Figure 2 shows key demographic information.²⁹ The population is around 7,400 (Croydon only) or 11,400 (including the Bromley streets). Over 40 % of the population is Black, Asian and Minority Ethnic (BAME). There are around 3,200 households in the Croydon section, a further 1,800 in the Bromley section. 43 % of households do not have access to a private vehicle. Taken as a whole, the neighbourhood is around the bottom of the middle third of the income distribution. The census districts within it range from two within the 30 % poorest in England to one around the middle of the income distribution. The neighbourhood is more affluent than some of the area to the south of it (the other side of South Norwood High Street), and less affluent than much of the area to the west (the other side of Church Road).

Figure 2: Key demographic information

Census LSOA	Income decile (lower number=poorer)	Population	% BAME	Households	No car	%no car
Croydon	008A	1272	57.8	568	243	42.8
	007D	1868	52.1	620	194	31.3
	007C	1638	44.7	773	310	40.1
(part)	001A	1052	37.6	438	173	39.5
	001B	1523	34.8	774	306	39.5
Bromley	005B	1917	30.1	842	480	57.0
	005E	2125	29.7	949	450	47.4
Total (Croydon only)	3.5	7353	45.8	3173	1226	38.6
Total (including Bromley)	3.4	11395	40.1	4964	2156	43.4

There is no data about the income status of households within the neighbourhood as opposed to the boundary roads. The two main areas of social housing both have some frontage on main roads, but most of the properties in them do not front main roads. There is no reason to believe that, taken as a whole, there is any difference in income levels between the boundary roads and the rest of the neighbourhood.

Summing up:

- The neighbourhood has a large population.
- It is diverse.
- It is not particularly well-off.

It is a long way from the “small, wealthy, white, enclave” scheme opponents have claimed.

Traffic in the neighbourhood before the LTN

Data

There are three sources of quantitative data about traffic in the neighbourhood before the LTN:³⁰

1. Council data from January 2013 recording vehicle numbers and speeds westbound on Auckland Road at the junction with Stambourne Way. These record numbers of motor vehicles (only) and speeds in one direction only (west/south towards South Norwood. They do not record vehicle type (car, van, etc).
2. Data downloaded by the council in January 2019 from the speed display device in Auckland Road just east of the junction with Stambourne Way, containing the same information as 1, though distinguishing between speeds below 20 mph and between 20 mph and 30 mph. (There is also data for August 2019, but that was, of course, at a time of year without school traffic, and which generally tends to be less busy.)
3. Counts carried out manually by residents in June and July 2020 in Sylvan Hill and Auckland Road. These include pedestrians and cyclists as well as vehicles, recorded by type, but do not record speeds. These counts both took place after the LTN's first phase with planters in South Norwood and on Auckland Road; and before the conversion into a bus gate on Auckland Road and the installation of planters on Sylvan Hill. However, they were carried out in the earlier phases of the lifting of the spring lockdown, when traffic levels still had not recovered from their very low levels. In particular, the schools were only open to a minority of pupils.

Rat-runs

Before the LTN was introduced, vehicles were able to make through journeys across the neighbourhood. The main rat-runs were:

1. Southern Avenue and Lancaster Road (and vice versa) as a route between South Norwood Hill and South Norwood High Street.
2. Hamlet Road, Auckland Road and Sylvan Hill, with some traffic also using Fox Hill and Stambourne Way, (and vice versa) as a route between Anerley Road and Church Road.
3. Hamlet Road, Auckland Road, Lancaster Road, and either Southern Avenue or the south end of Lancaster Road (and vice versa) as a route between Anerley Road and South Norwood.
4. As 3, but using Sylvan Hill, Stambourne Way and Fox Hill to travel to or from Church Road.

These routes (2 in particular) were indicated on navigation apps as preferable to the main roads even when traffic on the main roads was light.

Traffic volumes

In just over 6 years, the daily one-way total had well over tripled – equivalent to traffic increasing by nearly 23 %, year after year. Assuming broadly equal numbers of vehicles going both ways in the course of a day, the 2019 total is equivalent to around 12,000 vehicles a day. Figure 3 below shows the 2013 and 2019 daily totals

Figure 3: Vehicle movements, Auckland Road, Westbound, January 2013 and January 2019
Source: Croydon Council

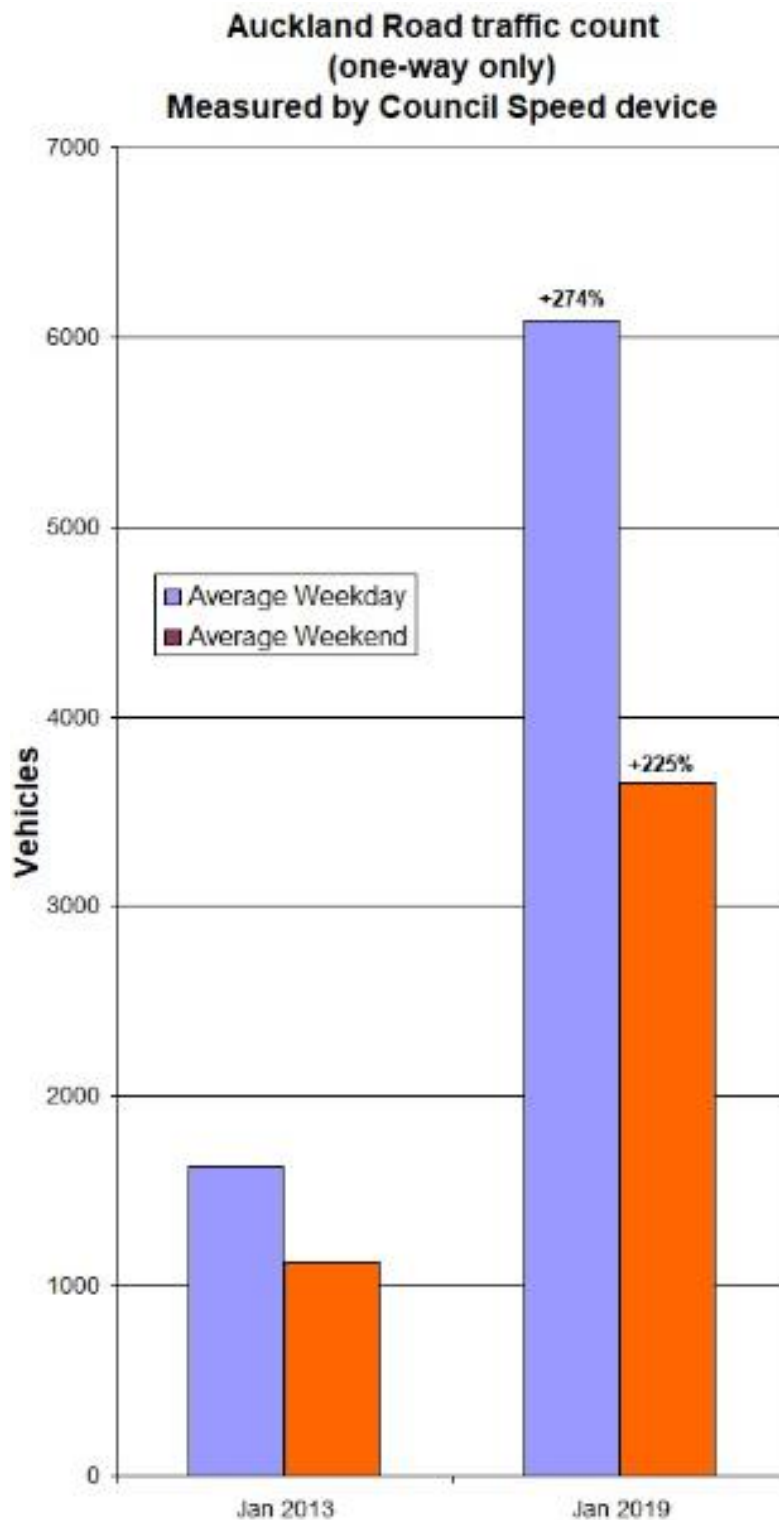
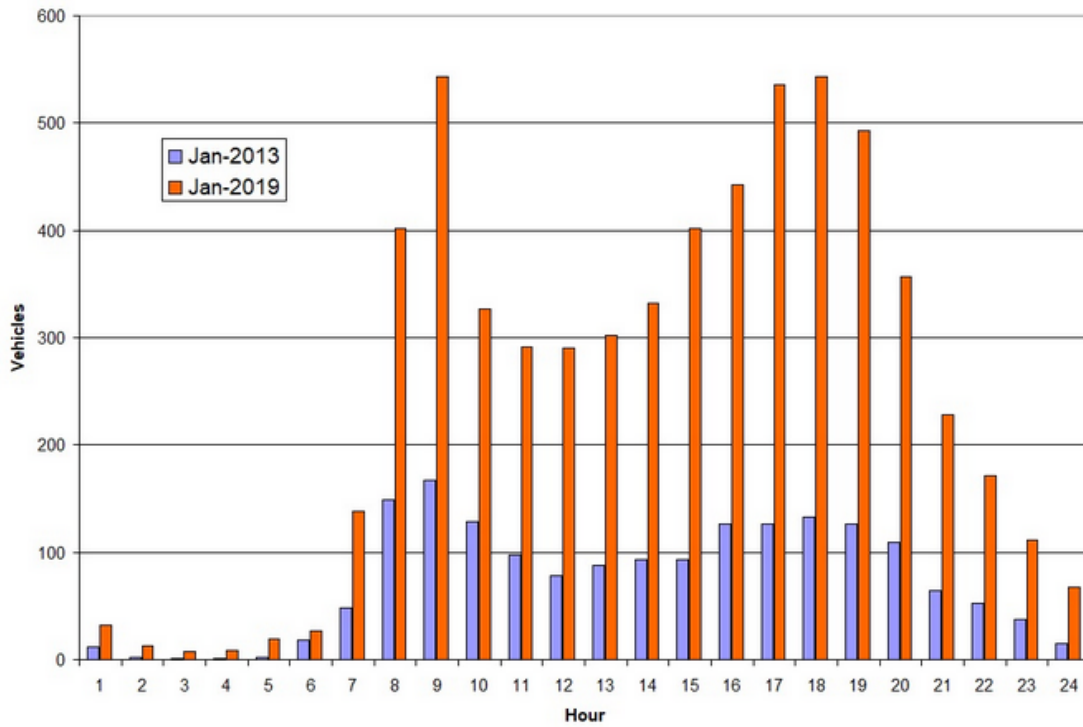


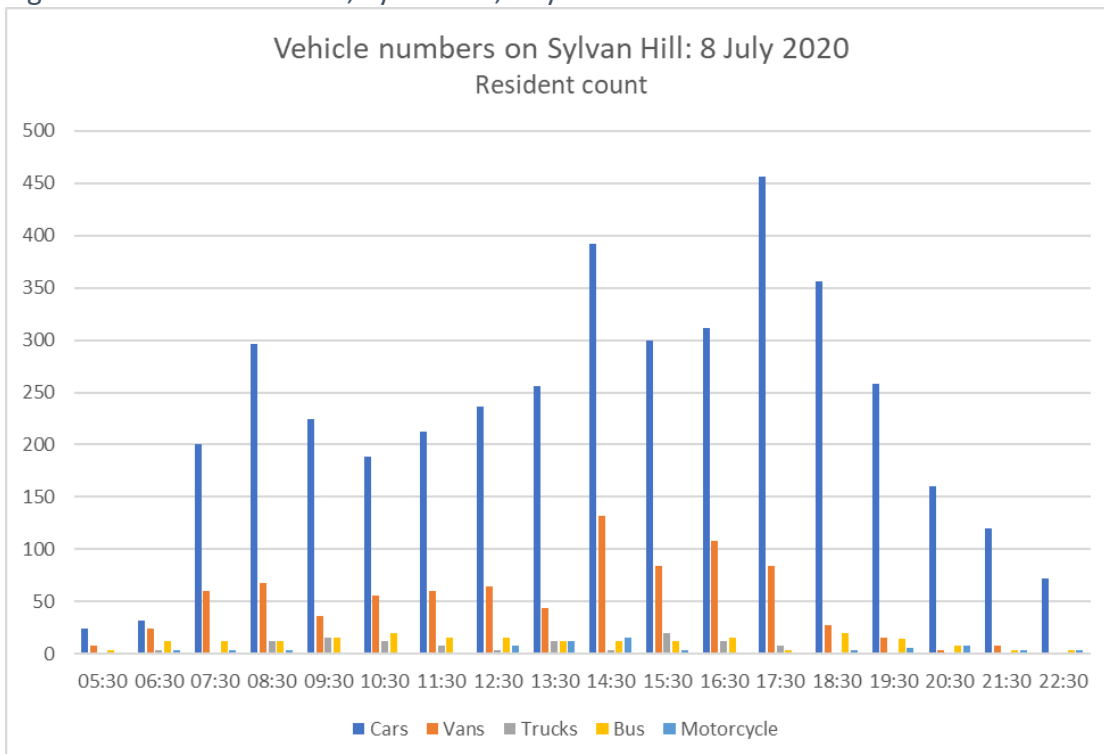
Figure 4 shows the hourly distribution in the two years. In 2013, one-way traffic only exceeded 100 vehicles per hour for 8 hours in the day. In 2019, high traffic was constant from early morning until well into the evening: over 290 vehicles an hour (one way) from 8 am to 9 pm.

Figure 4: Auckland Road traffic - 2013 and 2019: weekday hourly
Auckland Road hourly traffic count (one-way only)
 Measured by Council Speed device



In June and July 2020, residents carried out weekday manual counts on Auckland Road and Sylvan Hill. The results of the July counts (the lower of the two) are shown in Figure 5 below.

Figure 5: Vehicle Numbers, Sylvan Hill, July 2020

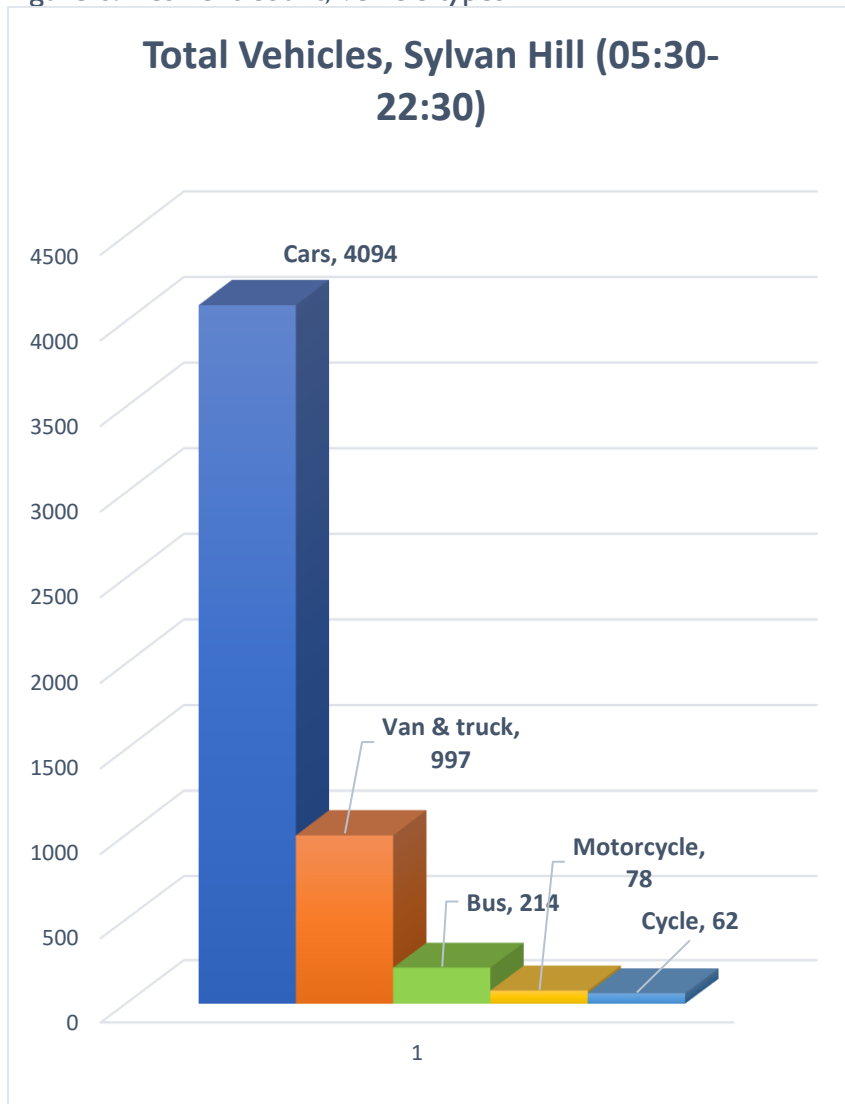


The daily total from this count, around, 5,400, is somewhat lower than the August 2019 council data, but still over 50 % higher than 2013. A number of factors may have been in play:

- In early July 2020, lockdown restrictions had not been fully lifted. In particular, schools were only operating for a limited number of pupils.
- Because, at that time, Auckland Road was closed to vehicles further south, Sylvan Hill was carrying traffic which would otherwise have been on Auckland Road. The 410 bus was using Sylvan Hill, but only accounts for at most 5 % of the vehicle movements recorded.

As Figure 6 shows, Light Commercial Vehicles, vans and smaller trucks, accounted for about 20 % of the total.

Figure 6: Resident count, vehicle types



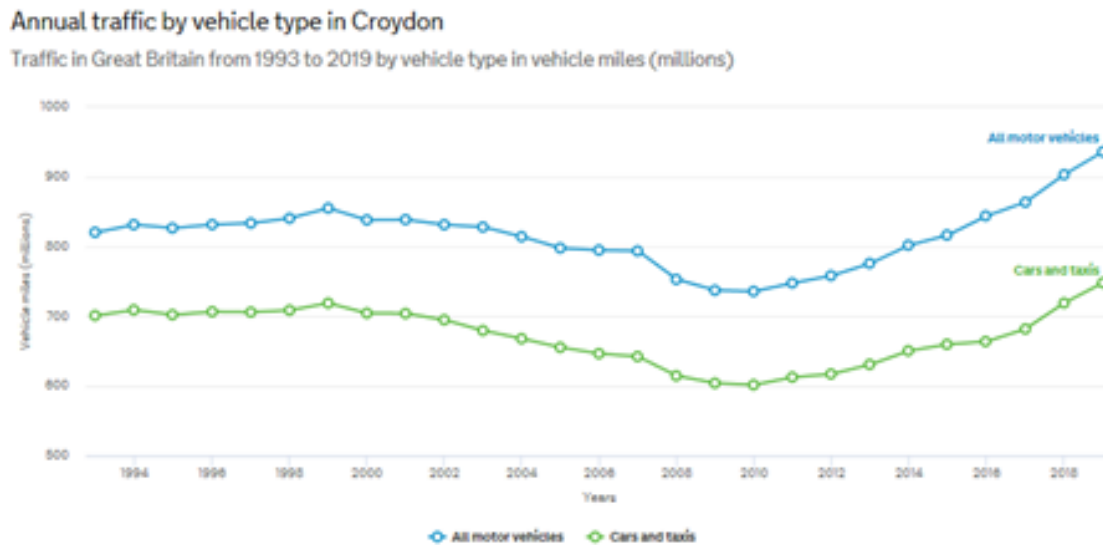
These are extraordinarily high volumes for side streets not part of the main road network. They are higher than recent data for the nearby A214 Central Hill and not much less than Anerley Road and Church Road.³¹ They are higher than the guideline figures suggested for

“Quietway” cycle routes in TfL guidance – critical since Lancaster Road and Auckland Road are designated as part of such a route.³²

The extent to which, within the last decade, Auckland Road and other streets have become, in effect, main roads, reflects broader trends across the borough and London as a whole.

Figure 7 below shows that in Croydon, there has been a 200-million-mile increase in miles driven in Croydon over the last 25 years, an increase of nearly 20 %.

Figure 7: Annual traffic by vehicle type: Croydon
Source: Department for Transport



But, as Figure 8 shows, the location of this increase has been very uneven. Across London as a whole, volumes on main roads have changed little. The entire increase has been on other streets, like Auckland Road and the other streets in the neighbourhood which have become rat-runs, and over the last 10 years or so. This increase is largely down to increased usage of satnav with traffic functionality, increased use of delivery services and lack of adequate cycling infrastructure.

Auckland Road and other now-busy streets in the neighbourhood are therefore the “canaries in the coal mine.” Their state, before the experimental LTN was introduced, was a consequence of an unsustainable growth in traffic volumes, and the diversion of that traffic off the main road network enabled by navigation apps.

Congestion

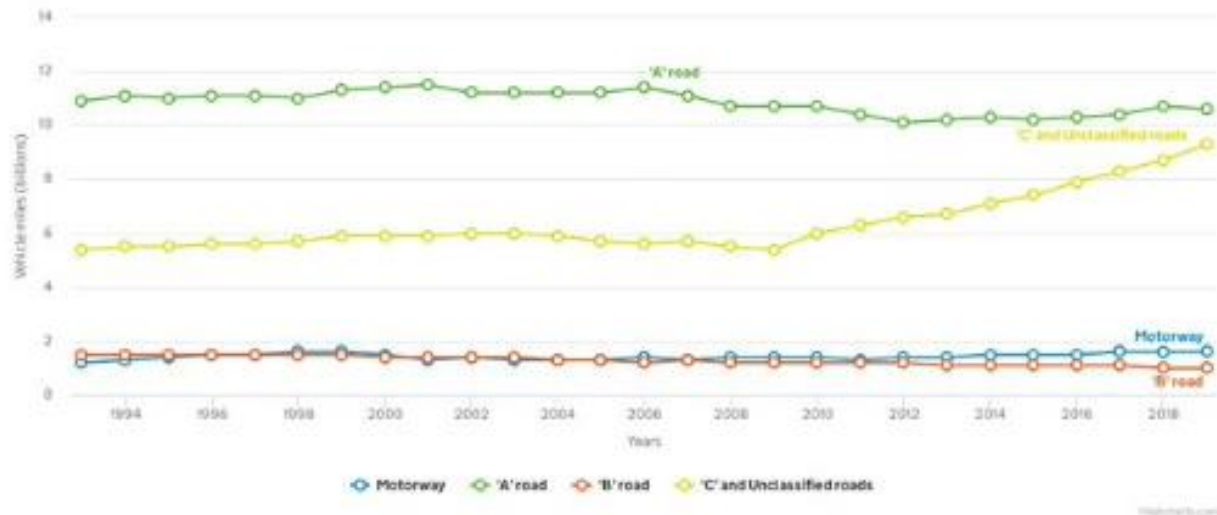
Because of the volume of traffic using streets not managed as main roads, and in particular with unrestricted parking, there was frequent congestion at pinch points such as the junction of Southern Avenue and Lancaster Road, on Hamlet Road, and on Auckland Road near the doctors’ surgery. On Hamlet Road, eastbound traffic often backed up as much as 300 m from the junction with Anerley Road. This would cause severe delays to the 410 bus and occasionally caused emergency vehicles to become stuck. It was common for altercations to take place between angry and frustrated drivers, both physically and verbally.

Figure 8: Traffic volumes: London and Croydon comparisons

Source: Department for Transport

Annual traffic by road type in London

Traffic in Great Britain from 1993 to 2019 by road type in vehicle miles (billions)

*Traffic danger*

The impact of traffic volumes was made worse by driver behaviour. On average, more than 80% of vehicles exceeded the posted 20mph limit. The median speed recorded on the road was 26.4mph – nearly a third above the speed limit. Half of all vehicles drove faster than this. The 85th percentile speed recorded was 33mph. That is, 15% of vehicles were being driven more than two thirds above the speed limit. The highest speed recorded was 70mph, at about 8:50pm in the evening. Most hours of the day, at least one vehicle was recorded at over 45mph.

This section of Auckland Road is used, and crossed, by large numbers of students walking to and from Harris City Academy Crystal Palace.

These streets have therefore recently been carrying volumes of traffic similar to main roads, with high levels of disregard for speed limits. But they are not managed or laid out with the features characteristic of main roads:

- Parking is much less restricted than is typical on main roads of similar width, and there are typically parked vehicles on both sides for significant stretches, leaving insufficient width for opposing vehicles to pass, and contributing to poor conditions for cycling when there are high volumes of traffic.
- Auckland Road contains a number of blind bends and crests. Combined with large numbers of parked vehicles, this means sight lines are poor in many places.
- There are no formal pedestrian crossings, only refuges at three locations along the whole length of Hamlet Road, Auckland Road and Lancaster Road, and no such features on any of the other roads. Sight lines are often blocked by parked vehicles.
- There are speed humps along the southern part of Auckland Road, and cushions further north on Auckland Road, Hamlet Road and on Sylvan Hill and Stambourne

Way. The cushions in particular do not appear to be effective in restraining speed, as the speed data summarised above shows.

- At the main junctions of streets in the neighbourhood with main roads – namely Hamlet Road/Anerley Road, Sylvan Hill/Church Road, Southern Avenue/South Norwood Hill and Lancaster Road/South Norwood Hill – there are no traffic signals or roundabouts.

Figure 9 is a photograph of Auckland Road, showing how the topography and high levels of on street parking make it unsuitable for high volumes of traffic.

Figure 9: Auckland Road: Typical look of street



As a result, the neighbourhood and its main road junctions have seen high volumes of traffic collisions. Junctions on Auckland Road within the neighbourhood also have a poor safety record (Figure 10).

There was a serious cycle injury on Sylvan Hill in July 2020, sadly illustrative of how large numbers of motor vehicles, many of them recklessly driven, created a dangerous environment, above all for people not in a motor vehicle. A driver overtook another travelling uphill, in the path of someone cycling downhill. The cyclist swerved off the road to avoid a head-on collision and hit a wall. The photograph below (Figure 11) shows a car that was involved in a collision on Southern Avenue last year. The car involved was driving fast enough for the car to mount the pavement on its roof. Luckily there were no pedestrians on the pavement at the time. There have been many other examples of speeding vehicles losing control on these residential roads.

Figure 10: Collision incidents in LTN and on junctions with main roads: 2000-2019³³



Figure 11: Crashed vehicle in Southern Avenue



Subjective safety for pedestrians and cyclists was poor. Pedestrians, in particular older and less able people, found crossing the roads, especially at the junctions of the 'hill roads' (Sylvan Hill, Stambourne Way and Fox Hill) extremely intimidating because of the speed and careless manner in which drivers took the turns.

"I felt like I was taking my life into my hands crossing Stambourne Way and Fox Hill at their junctions with Auckland Road. I was nearly hit several times and drivers frequently honked at me and verbally abused me." (Woman, 60, walking impairment)

"Before the LTN I would never have let my children walk or cycle to Cypress School alone. I used to have my heart in my mouth when my youngest (5) scooted off ahead of me." (Parent)

Before the LTN was in place very few parents would allow their children to walk to Cypress School due to safety concerns. In addition to this many parents would drive their children to local schools, including Harris Crystal Palace and Harris South Norwood. This would create pinch points and increased congestion at Lancaster Road, Southern Avenue and Auckland Road, which in turn caused delays to the bus and made the environment less safe for any children and adults not in cars.

Air quality

There has been, so far as we are aware, no air quality monitoring within the LTN. However, with Auckland Road and other streets carrying volumes of traffic comparable to nearby main roads, it is reasonable to assume that parts of the LTN were experiencing comparably poor air quality.

Noise

Likewise, there has not, so far as we are aware, been any monitoring of noise. Yet the volumes of traffic passing through some streets in the neighbourhood was clearly resulting in high levels of insidious noise pollution.

Impact on well-being

A survey of residents carried out in summer 2020 found that large majorities were concerned about air quality, noise and vibration.³⁴

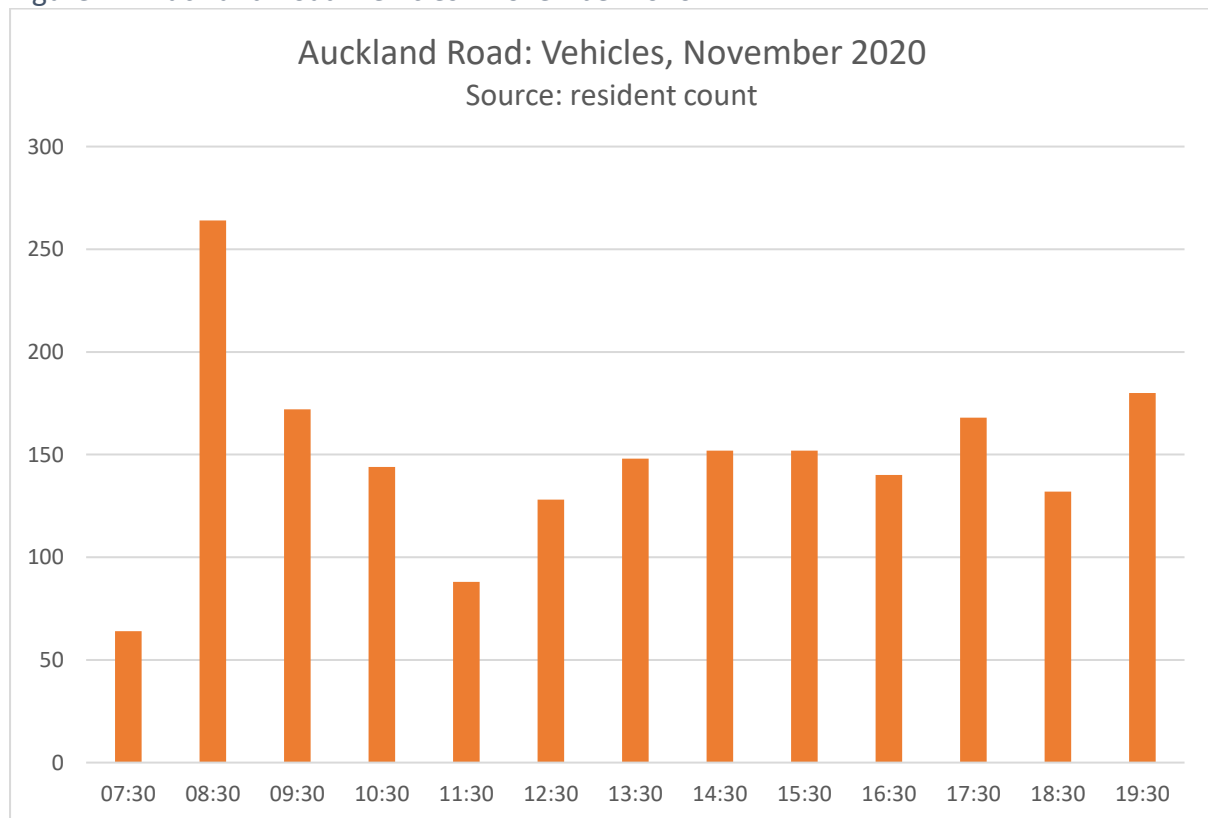
Positive Impact of the LTN

The introduction of the LTN has resulted in a dramatic reduction in motor traffic volumes on the previously busy roads in the neighbourhood (see pages 10–19 above). It has also led to more people walking and cycling.

Reduction in motor traffic movements, air and noise pollution, and traffic danger

Resident traffic counts carried out in the weeks beginning 16 and 23 November 2020 suggest a fall in motor traffic movements along Auckland Road and Sylvan Hill to around 1,700 per day, a two thirds reduction compared with July 2020 and three quarters compared with August 2019 (Figure 12). Only between 8 and 9am did numbers exceed 100 per hour.

Figure 12: Auckland Road: vehicles - November 2020



This fall in motor vehicle movements has had three main consequences for the local environment:

- A dramatic fall in air pollution. While there are no before or after measurements of air pollution, it is completely reasonable to assume that a two-thirds fall in vehicle movements will have resulted in much lower air pollution, and the experience of residents is certainly that the air is fresher.
- Likewise, a drop in noise pollution, as experienced on streets and in homes.

- A significant improvement in road safety. While a minority of vehicle drivers unfortunately continue to disregard the speed limit, and drive dangerously in other ways, the total volume of traffic has fallen so much that the incidence of dangerous driving and speeding is much less. The safety benefits are not just in the interior of the LTN. The intersections of the streets connecting the neighbourhood to the main roads (see pages 16–17 above) are also much safer for pedestrians and drivers because of the significant reduction in turning movements.

Travel to school

As well as the general reduction in traffic, the school run now has much less impact on the neighbourhood. Supported by positive communication from Harris City Academy Crystal Palace (HCACP), those parents who continue to drive their children to school are now dropping them or picking them up beyond the filters in Stambourne Way and Sylvan Hill. This means the street outside the main school entrance is now much quieter at the beginning and the end of the school day. This creates a safer environment for students and staff, supports social distancing, and reduces nuisance to local residents.

With the additional school street restriction further reducing motor access to Cypress Road, the great majority of home-school journeys to Cypress School are now by walking or cycling.

“Two girls from my class [Cypress School] now cycle to school regularly because the streets are now safe and school had a “Ride to School Week”. (Resident, 9)

“My son now cycles to school every day, on his own, as the roads are safe enough. He is really enjoying the freedom and getting fit.” (Parent)

Active travel

Figure 13 shows hourly estimates* of the numbers of people walking (in both directions) between 7 am and 7 pm in July and November.

The comparison is not like-for-like in an important respect. In July, there were few if any students of Harris City Academy Crystal Palace attending, whereas the school is currently functioning fully. Students account for a large proportion of the distinct peaks seen in the graph in the early morning and mid-afternoon, since Sylvan Hill is one of the main walking routes to the school. However, even removing 500–600 Harris student movements from the total, there has still been around a threefold increase in walking.

*Based on 15 minute counts at the half hour.

Figure 13: Sylvan Hill: Pedestrians

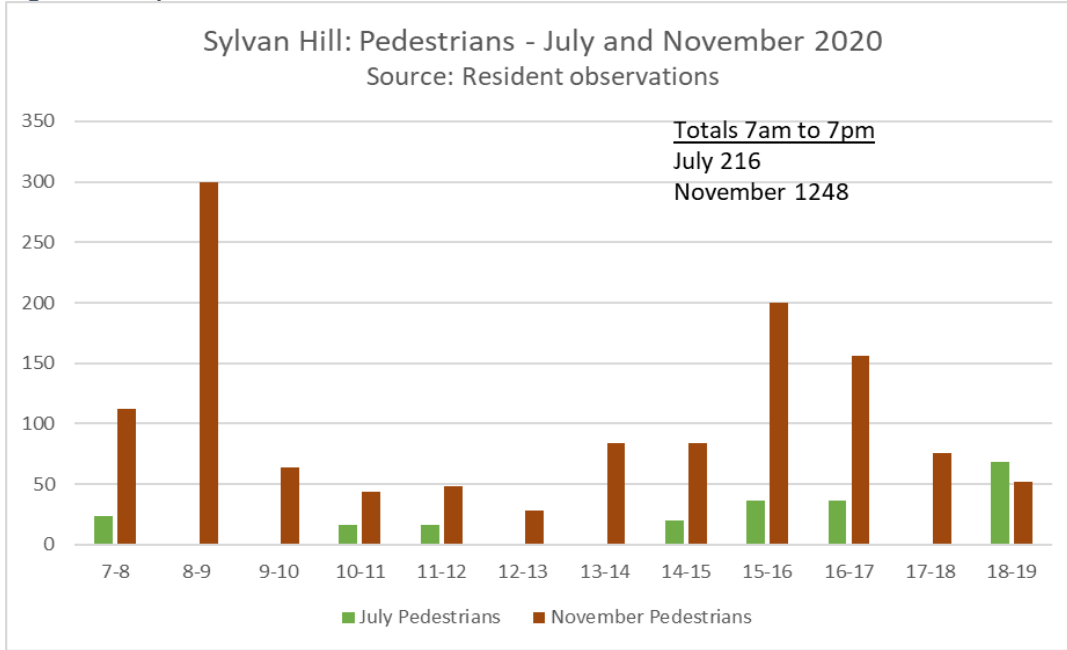


Figure 14 (below) shows hourly estimates of the numbers of people cycling (in both directions) between 7 am and 7 pm in July and November.

Total numbers have nearly tripled since the summer. During the morning commuting phase (7–9 am), there were approximately 60 cycle movements. While not counted separately, a considerable proportion of these were parents with children (on child seats or in cargo bikes or trailers). (Respect to these parents who are tackling the hill!)

Figure 14: Sylvan Hill: cycles

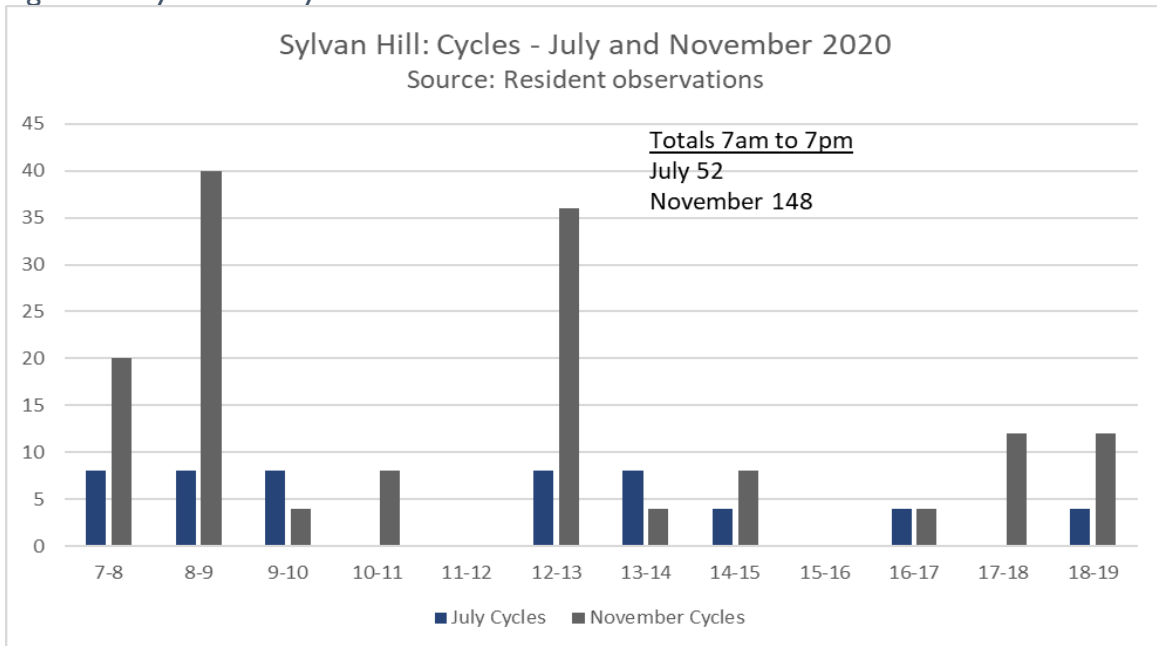


Figure 15 below shows the results of a pedestrian and cycle count at the Sylvan Hill/Auckland Road crossroads. There is no July data, but the results are nonetheless

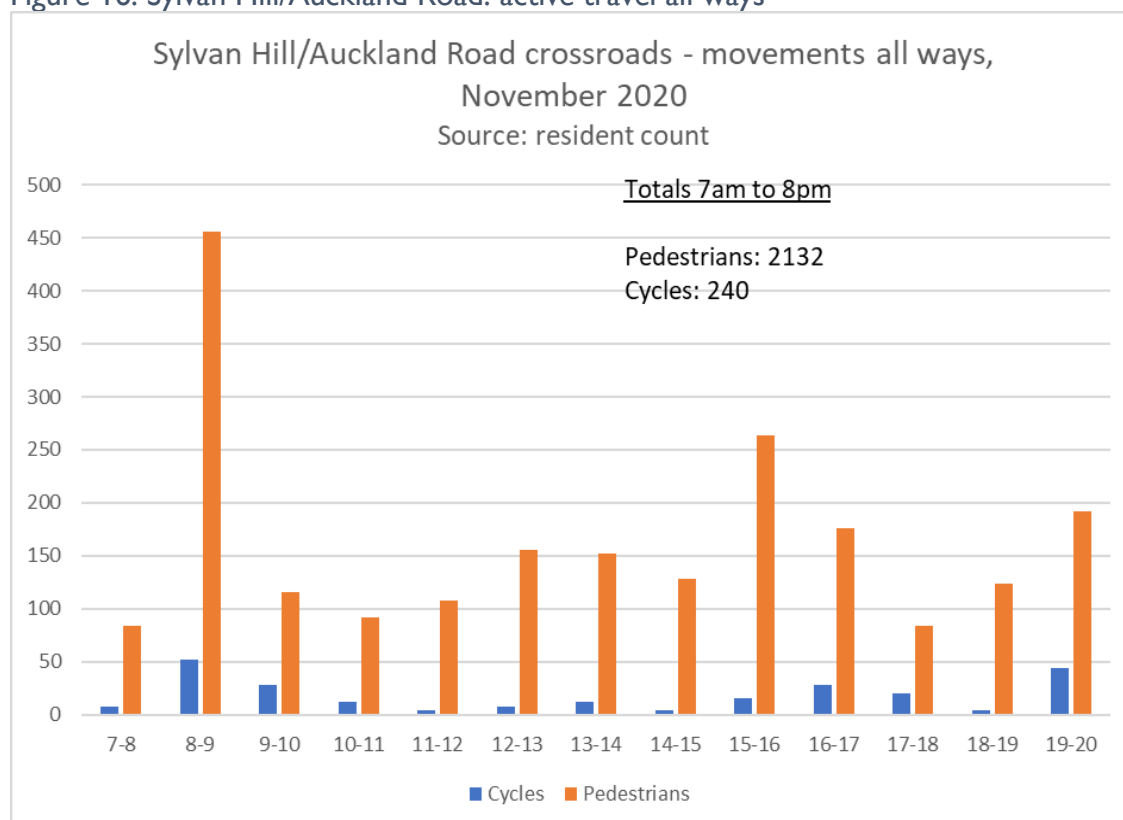
informative: some 240 cyclists passing through the junction during the course of the day, or around one every three minutes; and over 2100 pedestrians passing through the junction. As with the Sylvan Hill count, several hundred of these movements are of Harris students, but there is an enormous amount of general footfall at this location too.

The figures show the importance of Sylvan Hill and Sylvan Road as the main pedestrian access for HCACP students. Sylvan Hill is now a much safer environment for these high volumes of young pedestrians. It is possible to maintain social distancing because stepping in the road (with care) is now possible when it was impossible when the road was carrying several hundred vehicles an hour at peak times. Another important walking route to the school — from Anerley Road, via Hamlet Road and Maberley Road — is likewise much safer, since there is much less traffic using Hamlet Road.

The usefulness and safety of the designated cycle route through the neighbourhood (see pages 5 and 7 above) is much improved. This is reflected in the higher cycle numbers in the November traffic counts. A number of residents in middle or later years have commented that they have been able to cycle more, or resume cycling after having been frightened into stopping, and are consequently using bikes for local journeys which they would previously have made by car.

“I am back on a bike after over three years of being scared off by dangerous traffic. With other filtered streets in South Norwood and Woodside, it is now possible to ride most of the way into Croydon on a regular trip for which I used to drive. I am also now doing my weekly supermarket shop by bike, rather than car. I enjoy my rides and feel fitter.” (Resident, 50s)

Figure 16: Sylvan Hill/Auckland Road: active travel all ways



Public Transport

The 410 bus was previously affected adversely by congestion in Hamlet Road and Southern Avenue and had to negotiate stretches of road narrowed by parked cars with high volumes of opposing traffic. It can now pass through the neighbourhood with a minimum of conflict and delay and does not have to queue to join the main roads.

Active travel for disabled people

Much commentary on LTNs seems to rest on an assumption that the only way people with limited mobility can get around is by motor vehicle. In fact, people with limited mobility travel less by car than the rest of the population, both as drivers and passengers.³⁵ At least as much as everyone else in society, disabled people get around by a variety of means other than motor vehicles. Contrary to the stereotypes, many people with limited mobility can and do walk, often using aids like walking sticks and rollators, often with limitations on how far and fast they can go. People who cannot walk much, or at all, can likewise travel by a variety of means: manual or powered wheelchairs, or mobility scooters, most obviously. Contrary to much received wisdom, many disabled people can and do cycle, either on conventional bikes or a variety of adapted manual or e-assist bikes.³⁶ Like everyone else, most people with limited mobility use a variety of means of transport, depending on the length and nature of their journey and personal preference.

None of the non-car options are, of course, adversely affected by a Low Traffic Neighbourhood. Indeed, they are likely to be safer and more pleasant than in other neighbourhoods with high volumes of rat-running traffic. Tasks like crossing roads when there is a lot of traffic are much more difficult for disabled people walking or using mobility devices, because they usually cannot move as quickly as other people. They are more likely, as a consequence, to have to extend their journey to find a safe place to cross. In many ways, moving around on streets in residential neighbourhoods with high volumes of traffic may be more difficult than on main roads, which are engineered with features like pedestrian crossings and refuges. These real difficulties aside, like other non-motor users of streets, disabled people's experiences of walking, cycling or travelling by chair or scooter in Low Traffic Neighbourhoods are likely to be healthier and more pleasant because of the much lower levels of fumes, noise and aggressive behaviour from drivers.³⁷

Well-being benefits

There are well-evidenced associations between low noise, good air quality and regular moderate exercise, and physical and mental health (see pages 2-4 above). While it is very early days, it is reasonable to assume that, if the LTN continues, its direct impacts will over time translate into substantial well-being benefits.

Enabling children to walk or cycle to school is hugely beneficial for children's mental and physical well-being.³⁸ Multiple studies have shown the benefit active travel can have on children's academic attainment and behaviour for learning, as well as allowing them to build in physical activity to the daily routine. Furthermore, setting up healthy travel habits in childhood and adolescence leads to healthier adult travel habits.³⁹

Women are more likely to be responsible for educational escort trips and are less likely to feel confident cycling on busier roads, especially when travelling with children.⁴⁰ Families with lower incomes are more likely to be dependent on walking and our most deprived communities are also up to six times more likely to see their children killed walking or cycling to school than our least deprived.⁴¹

Another reported benefit is sociability. In the quieter and less stressed streets, it is now possible to stop on the street and have a conversation with acquaintances or strangers. So long as socialising indoors remains restricted, this will be particularly important for maintaining social contact and hence well-being.⁴²

The impact of the LTN is most noticeable on the roads which were previously busiest – the Hamlet Road, Auckland Road and Lancaster Road north-south route, and the streets connecting it to the main roads. However, the benefits are also experienced by people not living on those streets:

- The other streets, estates and cul-de-sacs in the neighbourhood. Their residents use what were the busier roads to enter and leave the neighbourhood. Nearly half of them do not have access to a motor vehicle so will normally either be walking, cycling or using the 410 bus. They are enjoying greater safety and convenience.
- People living outside the LTN but who travel through it. As mentioned above, large numbers of HCACP students and staff travel to and from the school through the LTN. People living outside the LTN walk or cycle through it to access amenities including the public open spaces, doctors' surgery, and places of worship.

.

Negative impacts of the LTN

A variety of negative impacts have been observed or claimed. They are:

- Longer journeys and inconvenience for residents who need to drive, including disabled people.
- A reduction in social safety for pedestrians in the neighbourhood.
- Obstruction and delays to emergency vehicles.
- Diversion of traffic on to the Bromley side streets adjacent to the northern boundary of the LTN.
- Diversion of traffic on to the surrounding main roads, with consequent adverse impacts on air quality, footfall and economic vitality in the 'Triangle' town centre of Crystal Palace.
- Diversion of traffic through other side streets, west of Church Road and South Norwood Hill.

In this section we review each in turn.

Longer journeys and inconvenience for residents who need to drive

As implemented up to August 2020, it is indisputable that some driving trips have become longer. For example, a driving journey from Auckland Road just north of the Cypress Road junction to the Crystal Palace Triangle has increased from 0.8 miles to 1.4 miles. A journey from the same location to Croydon town centre has increased from about 3.5 miles to 5 miles. Especially at busy times, this may add appreciably to journey times. While the longer journey time might encourage some people to switch from private car to other modes, in line with the intention of the LTN approach, there is likely to be some genuine delay and inconvenience for, for example, key workers who need to drive for their work, and disabled people for whom a vehicle is the only feasible means of transport.

However, the option suggested in the consultation of allowing resident access controlled by ANPR would mitigate this adverse impact in many cases. The consultation is also proposing to move the bus gate on Auckland Road to a location which will allow motor access to the doctor's surgery from both directions.

Disabled people who need to drive for some or all journeys will have experienced some adverse impact because some trips within, in or out of the neighbourhood are somewhat longer than they were previously. However, all properties in the neighbourhood can still be accessed by vehicle. Any increased journey lengths for disabled people using vehicles need to be weighed up against the benefits of safer streets for disabled people travelling by other modes (see pages 24-5 above). If the current filters are replaced by ANPR-controlled access, there will be no adverse impact on disabled residents who use vehicles.

Social safety

Claims have been made on social media that the reduction in motor traffic has resulted in the streets becoming unsafe for pedestrians, in terms of vulnerability to street crime. In our view, this is implausible. Government street design guidance suggests that high traffic tends to be associated with higher fear of crime by pedestrians, while pedestrians generally feel safe where their route is overlooked by buildings, and other people are using the street.⁴³

Most or all of any walking trips along streets in the neighbourhood are continuously overlooked by buildings, and, as set out above, there have been dramatic increases in walking and cycling in the neighbourhood since the LTN measures were installed.

At the risk of stating the obvious, the greater risk to pedestrians, being hit by a motor vehicle, is now much reduced.

The LTN has not been in place long enough for any reliable before-and-after conclusions. But we observe that recorded crime in the square mile including the LTN has in fact fallen from around 850 a month in June and July to 669 in October.⁴⁴

Emergency services

We assume the council has included emergency services in the current consultation. Clearly, their feedback, based on their operational data, should be conclusive in determining whether the changes have adversely affected their performance. So far as we are aware, despite frequent scaremongering on social media, there is no evidence of any material impact on emergency service response. Before and after comparisons in the Waltham Forest mini-Holland suggested that there was little impact on emergency service response, indeed a slight improvement.⁴⁵ The London Ambulance Service said at its annual meeting, in relation to schemes across London, that they were “not aware of any LTNs that have led to any patient safety concerns or any significant delays.”⁴⁶

Emergency service vehicles can, of course, pass through the Auckland Road bus gate and, we assume, if necessary, could disregard the school street restriction on Cypress Road. If the council retains the LTN with Automatic Number Plate Recognition (ANPR)-controlled access at the current filters, there will, of course, be no reason why there should be any effect at all on emergency vehicles.

Diversion to Bromley streets

Some Bromley streets have unequivocally benefited from the LTN, certainly Hamlet Road. It no longer experiences high volumes of traffic, including long queues of standing vehicles eastbound. However, the closure of Croydon borough streets further south to through traffic means that the only route from Hamlet Road or Auckland Road to Church Road, avoiding the main A214, is via Belvedere Road, Cintra Park, Patterson Road and Milestone Road. Residents have reported increases in vehicle numbers on these streets, including, at times, standing traffic, and confrontations between drivers attempting to navigate between parked vehicles.

These streets certainly offer a route from the northern part of the LTN to Church Road without going on to the A214. They also offer a potential diversion northbound away from the A214 to Church Road. Observation of navigation apps suggests drivers are being routed away from the main road at times of high congestion, but not at other times. However, unlike the currently closed roads, they do not offer a useful diversion route for traffic heading towards Anerley Hill from Church Road, since Milestone Road can only be accessed after travelling all the way round the Triangle. Once a driver has reached the Westow Hill/Anerley Hill junction, continuing into Church Road and down Milestone Road would take much longer than simply continuing along the main road.

In September 2020, volunteers from Shape Better Streets carried out observations in these streets to assess the scale and nature of this problem. Their findings were as follows:

- There appears to be a morning peak between 8 and 9am, of around 250 vehicles in the hour, mostly uphill, taking the four observations together, though there clearly are significant upward spikes from time to time.
- It is highly likely that the reaction of navigation apps to congestion on Anerley Hill may contribute to the higher levels of traffic at this time. That said, observations at the Auckland Road junction suggest that around 40 % of uphill movements originate from the south, within the LTN, not from Anerley Road.
- At other times, including the evening peak, it looks like the traffic does not exceed 100 vehicles an hour and is often significantly less.
- Many more vehicles drive uphill than downhill, especially in the morning peak. Cycle and pedestrian movements are more balanced.
- From the data collected, a guesstimate of vehicles per day would be 1,000-2,000, compared with over 10,000 a day in the Croydon streets further south before the LTN was implemented. At worst, no more vehicles are using these streets than continue to use Auckland Road for access (Figure 12, page 20 above).
- At the morning peak, traffic levels are comparable, though somewhat lower, than those observed in Auckland Road and Sylvan Hill before the Croydon LTN was implemented. At other times, however, they are around 25 % or less of those observed in the Croydon streets.⁴⁷

There is clearly a relationship between traffic on these streets and congestion on Anerley Hill. At the time of the observations, there was frequent congestion at peak times in the northern part of Church Road, back from the temporary lights then in place at the Westow Street junction. This tended in turn to knock on to Anerley Hill, as one of the roads feeding into Church Road. With the removal of the temporary lights, congestion on Church Road and Anerley Hill has reduced significantly (see following sections). So, the frequency and impact of episodes of high traffic on these streets should reduce (Figure 17).

Figure 17: Milestone Road, reported location of high volumes of diverted traffic, view west to Church Road, 8.45am, 3 December 2020



If the council introduces ANPR access on the streets accessing Church Road further south, the element of traffic which is using these streets for journeys from the neighbourhood to Church Road should reduce.

It remains to be seen how far there will be a recurrence of heavy traffic phases on these streets with the nearby main roads now being clearer following the removal of the Church Road temporary lights. However, there would be better answers to tackling the problem than allowing far larger volumes of traffic to start rat-running again through the streets further south. For example, a further modal filter (fixed barrier or ANPR device) could be installed, or the section of Milestone Road nearest Church Road could be made one-way from Church Road only. We understand, of course, that such measures would be a matter for Bromley Council.

Diversion of traffic on to nearby main roads

The Low Traffic Neighbourhood approach, by design, seeks to end the diversion of traffic from main roads, which are designated and designed to carry high levels of traffic, on to other streets, which are not, with the consequences explained above (pages 10-19 above).

However, if the result were that the main roads became unacceptably congested, that would clearly be a significant consequence to weigh up against the benefits set out above.

Before examining the evidence on this point, it is important to emphasise that the Triangle, South Norwood town centre and the main roads approaching them have experienced frequent serious traffic congestion for decades. This congestion is a consequence of high volumes of motor traffic on roads laid out in the 19th century with no conception of use by motor vehicles, let alone at today's traffic levels. While for much of the 168 hours in a week, these roads can and do carry high volumes of traffic without significant congestion, they become busy at peak times, and are vulnerable to incidental disruptions, for example road works, breakdowns, obstructive parking or collisions.

Congestion during the experimental period

Assessing the impact, if any, of the LTN measures on nearby main roads during the experimental period is very problematic:

- There was a general rise in traffic across London as lockdown restrictions eased, from May through to October.
- From March to late October, Church Road was reduced to alternate one-way working at the junction with Westow Street, and the right turn normally permitted from Westow Street was not available. This was because a car had collided with and seriously damaged a building, which had to be supported by a large scaffolding installation. As lockdown eased, before the completion of the LTN in early August, this was already resulting in lengthy queuing traffic along Church Road in both directions.
- At times during the experimental period, there have also been road works at various locations, including on South Norwood Hill during August, on at least two occasions at the crossroads in South Norwood, at Crown Point, and at the junction of Crystal Palace Park Road and Thicket Road.

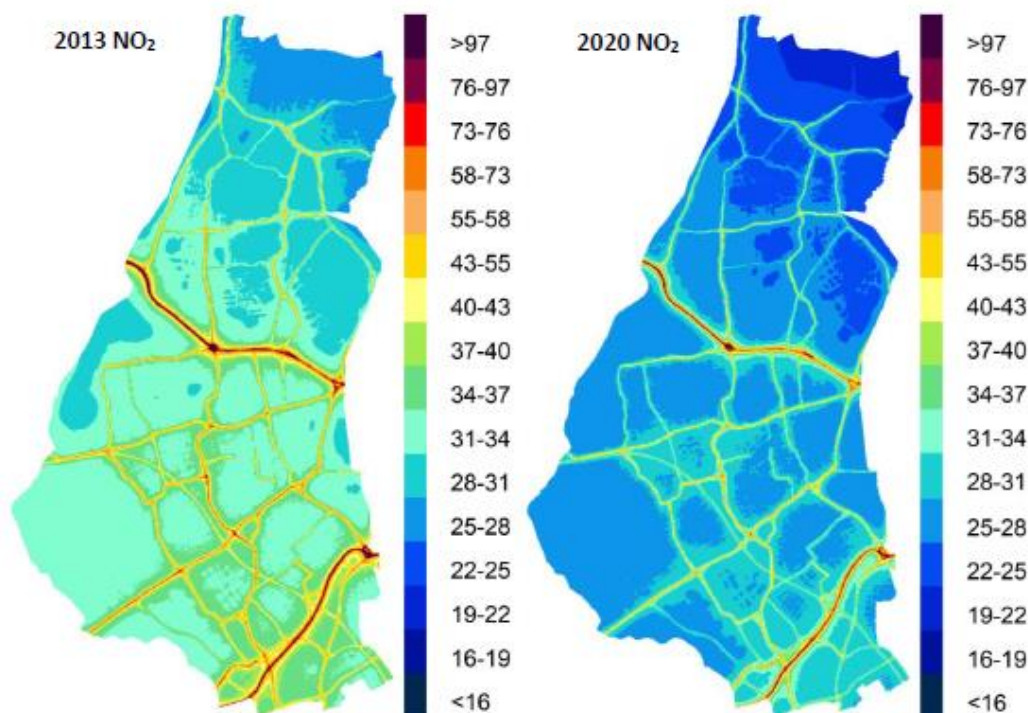
Aside from Church Road, which was badly affected by the alternate one-way restriction, it does not appear to us that, so far as one can generalise from the significant day-to-day variations, congestion on the main roads was any worse than it has been for many years. It would certainly go far beyond any evidence of which we are aware to suggest that vehicles no longer being able to drive through the LTN was decisive.

The removal of the scaffolding and one-way restriction in Church Road at the end of October made a big and immediate difference, however, to congestion in and around the Triangle. That suggests strongly that, to the extent vehicles are now using main roads which would otherwise have driven through the LTN, the main roads are able to carry the additional demand.

Air quality

Air quality on adjoining roads and in the two town centres is beyond doubt frequently poor. However, if, as we argue above, the heavy traffic and congestion which causes it cannot reliably be attributed to the LTN, opening the LTN roads again to rat-running would not assist. The Waltham Forest mini-Holland, including progressively rolling out LTNs, has reduced air pollution on 90 % of the borough's streets without worsening it on the main roads. (Figure 18)⁴⁸

Figure 18: Change in Nitrogen Dioxide emissions, Waltham Forest, 2013-2020



Local economy

Opponents of the LTN claim it has damaged the economy of the Triangle. Their chain of logic appears to be:

1. Businesses suffering loss of footfall and turnover, because:
2. Streets are unpleasant and access difficult for car-borne customers, because:
3. The Triangle and approaching main roads are congested, because:

4. The LTN has diverted traffic on to main roads.

We have seen nothing other than anecdote and assertion to support this line of argument. We have dealt above with the impact of the LTN on main road congestion (3 and 4). As for 1 and 2, so far as we are aware, only two retail or hospitality businesses have closed in the last six months. At weekends especially, the Triangle appears busy, in terms of walking footfall. Both closed premises have been taken over by new tenants. Despite the pandemic, several new businesses have opened in recent weeks. Tens of thousands of people live within walking distance; there are two nearby rail stations and numerous bus routes, and there is, so far as we know, no recent or reliable data on how customers travel to the Triangle. National research suggests retailers tend to over-estimate the proportion of customers travelling by car and under-estimate the proportion walking, cycling or using public transport.⁴⁹

It may be that some businesses are experiencing reduced footfall and turnover. However, aside from the implausibility of attributing traffic congestion to the LTN, there are many other current factors affecting customers' ability to spend and shopping choices, including uncertainty about employment and earnings, and reluctance to visit busy environments. Older residents in the LTN have commented to us that they feel unable to maintain social distancing using the narrow pavements in the Triangle, particularly since the removal of the temporarily widened footways installed in the spring.

Diversion of traffic into other residential neighbourhoods

We are aware of concern about rat-running in two nearby neighbourhoods, the streets between Beulah Hill and Central Hill, around Harold Road, and west of South Norwood Hill. In the latter area, the council has installed modal filters which prevent Holmesdale Road from being used for east-west motor journeys, but the north-south streets remain open.

Rat-running may well have been increasing in these neighbourhoods, for the same reasons it had been increasing in the LTN before its inception (see pages 10-19 above). We are not aware of any evidence that the introduction of the LTN has made a significant difference, on top of the other factors contributing to congestion on main roads. In any event, a more effective response than re-opening the LTN to rat-running would be to make these neighbourhoods LTNs as well. We understand that some residents are beginning to campaign for that.

Next steps

We hope and trust that, in the light of this submission and other contributions to the consultation, the council will decide to retain the LTN, with modifications.

We support the proposed re-siting of the bus gate to improve access to the doctors' surgery.

There are differences of view within our group about the respective merits of retaining physical barriers to vehicles and replacing them with ANPR-controlled access. As a group, we are content for the council to make that judgement, on the basis of the views of residents and the reasons they give for them. Both approaches would bring about the important result, which is a continuation of the reduction in vehicle movements brought about by the LTN.

If the LTN is retained, there will need to be strong communication with residents and others about the following:

- If the decision is to proceed with ANPR access, the location of 'gates', and how to obtain permits. The routes which will be open to those without permits should be well publicised and signed.
- Encouraging further increased take-up of cycling. From what we can see, there is not enough awareness either outside the LTN of the safe, pleasant, cycling routes which have now been opened up, nor inside and outside the LTN about how, combined with other measures along Holmesdale Road and Albert Road, it is now possible to ride most of the way to Croydon town centre with minimal use of busy main roads.
- Continued explanation of the intent and benefits of LTNs, and myth-busting.

As a group, we offer our support to work alongside the council in these communication challenges.

It is regrettable that relationships between the two neighbouring boroughs, Croydon and Bromley, have not been managed well. Neither council emerges with much credit from recent history. We hope that they will now start to co-operate to the benefit of residents, who are very much part of one community, whichever side of the boundary they happen to live. In particular, there should be continuing engagement with residents of Belvedere Road and other streets which have experienced periodic spikes of rat-run traffic and dangerous driving, to find a solution. We hope that the newly established cross-boundary councillor group can assist with this.

We do not accept that the LTN has worsened, or will, worsen congestion, air quality, traffic danger or other characteristics of surrounding main roads and town centres. If anything, the behaviour change which it is intended to bring about should help by encouraging shift from private cars to other modes. However, that does not alter the fact they have been for many years, and, without action, will continue to be, poor environments for people living and travelling on them by active modes. We encourage the council to develop plans to improve them, working with other boroughs around the Triangle. Again, the councillor forum is a good platform for making this happen.

Conclusion

Over the last decade, rat-running in the neighbourhood has increased to the point where it has been having a completely unacceptable impact on residents' health and quality of life, because of air quality, noise, and traffic danger. These impacts affected the whole neighbourhood, not just the busy streets, since the latter are the main access routes from anywhere in the neighbourhood to nearby main roads and amenities. Over 40 % of households do not have access to a vehicle, so were experiencing nothing but detriment from uncontrolled motor vehicle access through the neighbourhood.

Traffic levels also made active travel unpleasant and unsafe, for residents and those passing through on foot or cycling. There could be no realistic prospect of the Lancaster Road/Auckland Road cycle route being brought up to the required London standards without either suppressing motor vehicle use of it, or engineering solutions such as cycle lanes and junction improvements which would both be hugely costly and not achievable without removing all or most on-street parking.

Safe active travel through the neighbourhood is critical, not only as a means of maintaining a decent cycling network in the borough, but as a means of enabling local families, inside and nearby the LTN, to use active travel to access the park, their children's school and other services and amenities.

The global climate emergency, and the weight of national, London and local policy on air quality, public health and local transport all point overwhelmingly towards the adoption of measures such as those put in place or now proposed for the LTN. Though far from perfect, the experimental scheme has shown that the approach can produce strong improvements in local health and well-being, and, only three months on, has produced very significant increases in active travel.

By contrast, the claims of opponents about the adverse consequences of the scheme are almost entirely based on assertion and anecdote. The concerns which are more credible: disproportionate diversions for residents who need to use vehicles, including disabled residents, and the intermittent heavy traffic on some of the Bromley streets, can be addressed effectively without reopening the whole neighbourhood to rat-running.

If the LTN trial is removed, we can expect traffic volumes and speeds once again to return to levels which would have huge adverse impacts on residents' health and well-being and make healthy travel choices less convenient, less attractive and less safe.

Children and young people cannot vote and families with young children are often least able to participate in debate around local issues. These voices are so often lost in our local decision-making processes. They must not be ignored.

The streets in the LTN can either be a pleasant, safe neighbourhood to live, and an active travel corridor. Or they can be a congested, polluted, dangerous, bypass for the Triangle and the main roads. They cannot be both. There is no credible basis for the council choosing the latter.

References

- ¹ Facts about the Climate Emergency, UN Environment Programme <https://www.unenvironment.org/explore-topics/climate-change/facts-about-climate-emergency>
- ² Air pollution 'costs UK economy £54 billion a year', airqualitynews.com, [https://airqualitynews.com/2015/04/28/air-pollution-costs-uk-economy-54-billion-a-year/#:~:text=Indoor%20and%20outdoor%20air%20pollution,Organisation%20today%20\(April%202028\).](https://airqualitynews.com/2015/04/28/air-pollution-costs-uk-economy-54-billion-a-year/#:~:text=Indoor%20and%20outdoor%20air%20pollution,Organisation%20today%20(April%202028).)
- ³ Air quality, Taskforce for Lung Health <https://www.blf.org.uk/taskforce/data-tracker/air-quality/pm25>
- ⁴ Understanding the Health Impacts of Air Pollution in London, Heather Walton et al, King's College London, July 2015, p8
- ⁵ Study estimates exposure to air pollution increases COVID-19 deaths by 15% worldwide, European Society of Cardiology, 27 October 2020 <https://www.escardio.org/The-ESC/Press-Office/Press-releases/study-estimates-exposure-to-air-pollution-increases-covid-19-deaths-by-15-world>
- ⁶ Why children die – research and recommendations (2014), Royal College of Paediatrics and Child Health <https://www.rcpch.ac.uk/resources/why-children-die-research-recommendations>
- ⁷ Health Impacts of Cars in London, Mayor of London, September 2015
- ⁸ Mayor's Transport Strategy, Mayor of London, March 2018, p17
- ⁹ Health Impacts of Cars in London, Mayor of London, September 2015, p1
- ¹⁰ £2 billion package to create new era for cycling and walking, Department for Transport, 9 May 2020 <https://www.gov.uk/government/news/2-billion-package-to-create-new-era-for-cycling-and-walking>
- ¹¹ Traffic Management Act 2004: network management in response to COVID-19, Department for Transport <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>
- ¹² Public Opinion Survey on Traffic and Road Use, Kantar, for Department for Transport, November 2020,
- ¹³ Coronavirus: Will traffic in London double as lockdown eases?, Tom Edwards, BBC, 9 June 2020 <https://www.bbc.co.uk/news/uk-england-london-52964751>
- ¹⁴ London Mini Hollands: Building Dutch-style cycle infrastructure in outer London boroughs, Department for Transport, 7 February 2020 <https://www.gov.uk/government/case-studies/london-mini-hollands#:~:text=A%20study%20investigating%20the%20early.have%20not%20yet%20been%20made.>
- ¹⁵ Low Traffic Neighbourhoods: what is the evidence from the mini-Holland interventions? Rachel Aldred, 1 September 2020, <http://rachelaldred.org/research/low-traffic-neighbourhoods-evidence/>
- ¹⁶ Health benefits: Walking and cycling is good for you...here's why, Enjoy Waltham Forest <https://enjoywalthamforest.co.uk/about-mini-holland/>
- ¹⁷ Health matters: obesity and the food environment, Public Health England, 31 March 2017
- ¹⁸ Every Child a Healthy Weight: Ten Ambitions for London, London's Child Obesity Taskforce, Greater London Authority, 2019, p30
- ¹⁹ National Travel Survey 2014: Travel to school, Department for Transport
- ²⁰ Croydon to declare climate emergency, Croydon Council, 8 July 2019 <https://wp.croydon.gov.uk/newsroom/croydon-to-declare-climate-emergency/>
- ²¹ Croydon's climate commission sets out focus for tackling climate change, Croydon Council, 21 May 2020 <https://news.croydon.gov.uk/croydons-climate-commission-sets-out-focus-for-tackling-climate-change/>
- ²² Recommendations from Citizen's Assembly on Climate Change, paper for Croydon Cabinet, 8 June 2020, paragraph 4.1
- ²³ INRIX Global Traffic Scorecard: Congestion cost UK economy £6.9 billion in 2019, INRIX <https://inrix.com/press-releases/2019-traffic-scorecard-uk/>
- ²⁴ Air Quality Action Plan 2017-22, Croydon Council, Table 4.1
- ²⁵ On our Bikes: Realising Croydon's cycling potential, Croydon Cycling Strategy 2018-202, Croydon Council, 2017
- ²⁶ Space4Cycling Campaign – 2014 Local Elections, Croydon Cycling Campaign <https://croydoncyclists.org.uk/index.php/2014-borough-elections/>
- ²⁷ Labour's plan for Croydon: #Ambitious4Croydon, Croydon Labour Party, 2018, p11, p21.
- ²⁸ Our Corporate Plan for Croydon 2018-22, Croydon Council, p19, p25
- ²⁹ Derived from Ministry of Housing, Communities and Local Government, Index of Multiple Deprivation, and London Datastore, Super Output Area Population (LSOA, MSOA), London
- ³⁰ All data can be downloaded from Crystal Palace LTN website *Traffic surveys* <https://crystalpalaceltn.org/2020/08/29/traffic-survey/>

-
- ³¹ TfL data, quoted in *Crystal Palace traffic – what are the facts and what’s to be done?*, Tom Chance, <http://tomchance.org/2020/11/07/crystal-palace-traffic-what-are-the-facts-and-whats-to-be-done/>
- ³² *London Cycling Design Standards*, Chapter 2, p31
- ³³ Source: Crashmap
- ³⁴ *Traffic Survey, Crystal Palace LTN* <https://crystalpalaceltn.files.wordpress.com/2020/09/traffic-survey.pdf>
- ³⁵ *National Travel Survey, 2019*, Department for Transport
- ³⁶ *Wheels for Wellbeing* <https://wheelsforwellbeing.org.uk/>
- ³⁷ *Low Traffic Neighbourhoods: Disabling or enabling*, Crystal Palace LTN <https://crystalpalaceltn.org/2020/08/29/low-traffic-neighbourhoods-disabling-or-enabling/>
- ³⁸ *Exercise and Mental Health: for young people*, Royal College of Psychiatrists <https://www.rcpsych.ac.uk/mental-health/parents-and-young-people/young-people/exercise-and-mental-health-for-young-people>
- ³⁹ *Briefing Paper: How can active travel enhance educational attainment in school children?* Dr Darshana Bhattacharjee, Bristol City Council, April 2015
- ⁴⁰ *Inclusive city cycling - Women: reducing the gender gap*, Sustrans, June 2018
- ⁴¹ *Reducing unintentional injuries on the roads among children and young people under 25 years*, Public Health England, June 2014, p9-10
- ⁴² *Social connections and the brain: Age UK* <https://www.ageuk.org.uk/information-advice/health-wellbeing/mind-body/staying-sharp/looking-after-your-thinking-skills/social-connections-and-the-brain/>
- ⁴³ *Manual for Streets*, Department for Transport, 2007, p67
- ⁴⁴ UK Crime Statistics, search on SE19 2DH
- ⁴⁵ *The urgent case for more walking and cycling in the UK*, Walking and Cycling Alliance, November 2020, p12.
- ⁴⁶ Ibid
- ⁴⁷ *Impact of Crystal Palace LTN on adjacent streets in Bromley*, Crystal Palace LTN <https://crystalpalaceltn.org/2020/09/23/impact-of-crystal-palace-ltn-on-adjacent-streets-in-bromley/>
- ⁴⁸ *Air Quality: concentrations, exposure and attitudes in Waltham Forest*, David Dajknak et al, King’s College London, p7-9
- ⁴⁹ *Shoppers and how they travel*, Sustrans, 2006

Petitions

Online petition submitted by Open Our Roads calling for the reopening of Southern Avenue and Lancaster Road to through traffic

29 June to 11 November, 2089 'Signatures' 26 of which non UK

Petition submitted in spreadsheet for as a list of names and addresses. As this is 'personal information' post codes have been plotted at the UK, London and local level

Reopen Southern Avenue/ Lancaster Road Junction, in South Norwood



Sonia M started this petition to Croydon council

As many local residents will know, the junction of Southern Avenue/ Lancaster Road has been closed under the guise of Covid 19 there is no clear reason for this action and it lacks transparency.

This approach to traffic management has failed to consider the health of pedestrians or other road users.

This change has led to significant congestion, and is likely to lead to an increase of accidents involving vehicles and pedestrians.

The traffic can go on for miles on South Norwood Hill and Penge Road. No other traffic calming measures have taken place such as changes to the traffic lights, again causing risk to pedestrians.

Another ill conceived idea by Croydon Council.

The aim of this petition is to reopen the junction, reduce congestion and make it safe again.

<https://www.google.co.uk/amp/s/insidecroydon.com/2020/05/15/south-norwoods-road-closures-cause-mile-long-tailbacks/amp/>

2,085 have signed. Let's get to 2,500!

- Tanya Puri signed this petition
- Richard Charles signed this petition

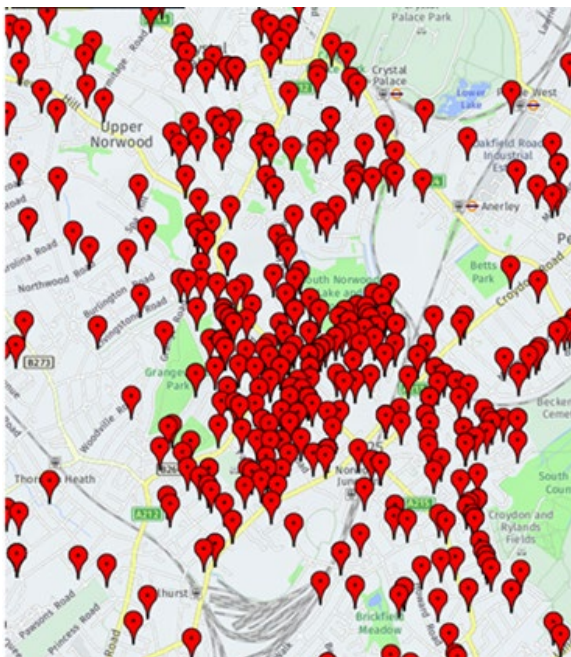


Share on Facebook

- Send a Facebook message
- Send an email to friends
- Tweet to your followers
- Copy link

Show this petition to more potential supporters

Promote this petition

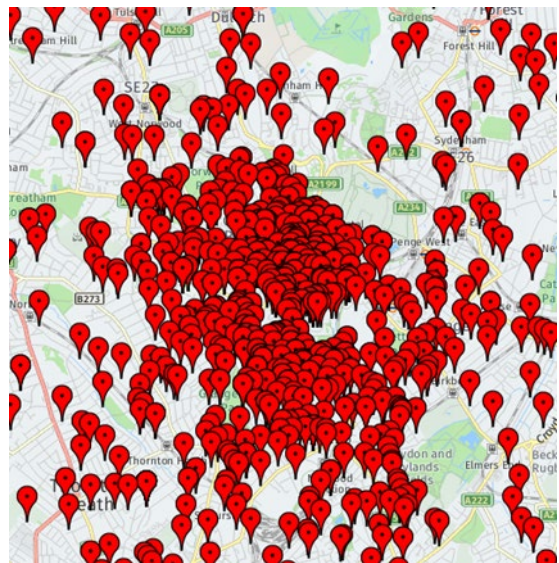
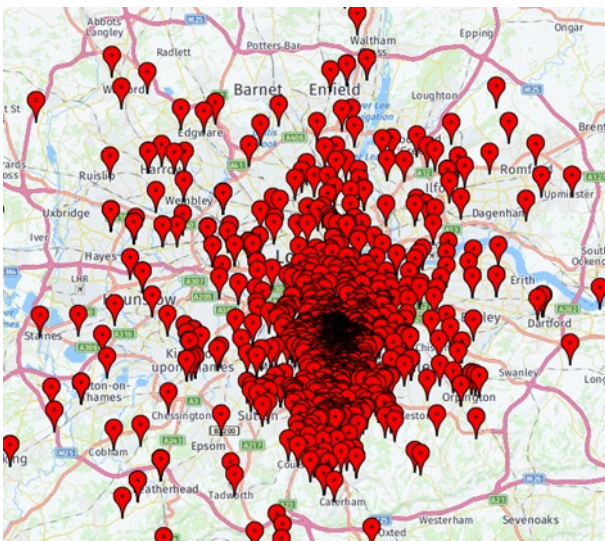


Online petition submitted by Clem Rose, calling for “Stop Croydon Council ludicrous plans to block Sylvan Hill, Stambourne Way and Fox Hill”

20 July to 21 November, 3002 ‘Signatures’

Petition submitted in spreadsheet form as a list of names, city, state, post code, country and date. As this is ‘personal information’ post codes have been plotted at the UK, London and south London levels

The screenshot shows the top of a petition page. The title is "Stop Croydon Council ludicrous plans to block Sylvan Hill, Stambourne Way and Fox Hill". Below the title, there is a short description: "Croydon Council are planning to further restrict vehicle access to Auckland Road and surrounding streets without consulting the residents who live there. There are already planters placed at the junction of Lancaster Rd and Cypress Road has restricted access during." A "Learn more" link is provided. The petitioner's name is "Clem Rose" and it shows "3,016 supporters". There are two small images: one showing a road sign and another showing a street scene.



Online petition submitted by Stuart Aitken, calling for “Stop Croydon Council from diverting traffic into Belvedere, Cintra, Patterson and Milestone”

19 August to 26 November 1055 ‘Signatures’

Petition submitted in spreadsheet form as a list of names, city, state, post code, country and date. As this is ‘personal information’ post codes have been plotted at the UK, London and local level

Stop Croydon Council from diverting traffic into Belvedere, Cintra, Patterson & Milestone

1055 have signed. Let's get to 1500!

Keywicks signed 12 hours ago

Margaret Moore signed 3 days ago

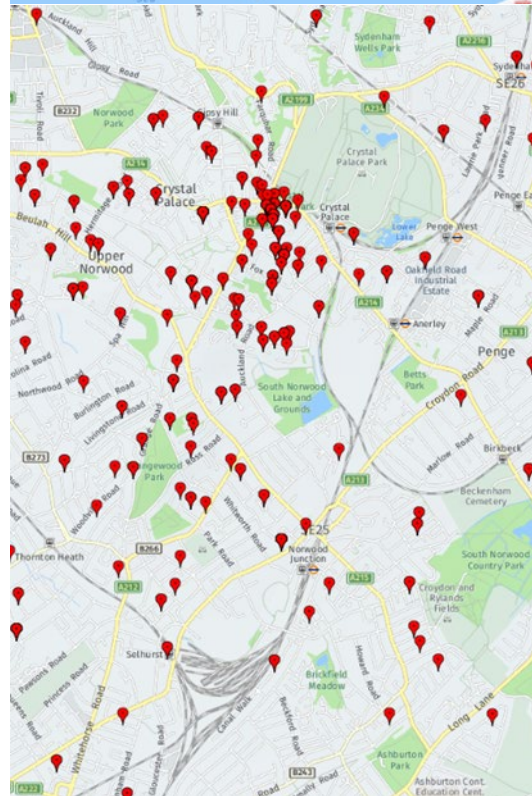
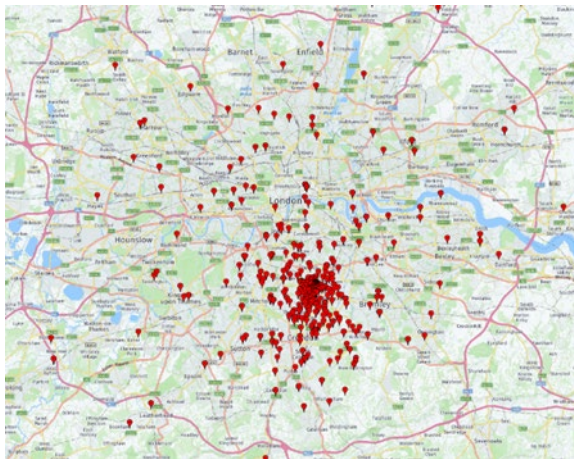
Thanks to your support this petition has a chance at winning! We only need 445 more signatures to reach the next goal - can you help?

Take the next step!

Stuart Aitken started this petition to Croydon Council (Highways Improvements)

Croydon Council recently closed Auckland Road, Sylvan Hill, Stambourne Way and Fox Hill - effectively diverting huge amounts of traffic via Belvedere Road, Cintra Park, Patterson Road and Milestone Road.

Croydon Council itself has singled out these roads as the best way for motorists to navigate the road closures. A public notice in the Croydon Guardian (published three days after Croydon Council closed the roads) states: “While the closures are in force the diversion routes for traffic will be via Auckland Road, Belvedere Road, Cintra Park, Patterson Road and Milestone Road, or via Auckland Road, Hamlet Road, Anerley Hill and Church Road.”



Further Information on Environmental Impacts Including Air Quality

Air Quality Strategy

- 1.1 The 'UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (July 2017)¹ explains that over recent decades, UK air quality has improved significantly, with emissions of nitrogen oxides (NO_x) falling by almost 70% between 1970 and 2015 and by 19% between 2010 and 2015. However, it makes clear that the most immediate air quality challenge is tackling the problem of NO₂ concentrations around roads, it being the only statutory air quality limit that the UK as a whole is currently failing to meet. The Plan highlights the fact that the issue is particularly experienced in towns and cities. The Plan explains what action central government is taking, including providing £1.2 billion – for Cycling and Walking via the 2017 Cycling and Walking Investment Strategy. It also explains that the Mayor of London is responsible for air quality in the capital. Just like that of central government, the Mayor's approach to reducing air pollution from road transport is to encourage and facilitate more active and healthy travel, and to shift to cleaner vehicle technology for those motorised trips that remain.
- 1.2 Central government's 'Clean Air Strategy' (2019) highlights some of the benefits to be derived from encouraging more cycling and walking for short journeys, including reduction in traffic congestion and emissions from road transport, as well as health benefits from more active lifestyles. It describes the investment sums and channels central government has put in place to



1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-detail.pdf

Mayor's Transport Strategy and Croydon LIP

- 1.3 The Mayor's Transport Strategy focus on the Healthy Streets approach is aimed at making streets healthy places supporting active travel, in turn more active travel leads to reduced pollution emissions. It sets a target for 80% of Londoners' journeys to be by walking, cycling or public transport by 2041. To support this the Croydon LIP includes the target of 63% of journeys by Croydon residents to be by walking, cycling or public transport by 2041 (from a 2013/14 - 2015/16 baseline of 49%). In response to the Strategy Outcome 3 'London's streets will be used more efficiently and have less traffic on them', the Croydon LIP sets a series of targets including that for vehicle kilometres driven in Croydon, the target for which is for vehicle kilometres to be 10% less in 2041 than in 2015.
- 1.4 The Strategy also includes reducing and cleaning emissions from motor vehicles. When the assessment was undertaken in 2016 to produce pollutant concentration isochrones maps within the PJA report, London was subject to the London-wide Low Emission Zone (LEZ). This requires all heavy vehicles to meet the Euro 4 Particulate Matter (PM) standard or pay a daily charge of £200. Subsequently there has been the introduction of the Ultra-Low Emission Zone (ULEZ) in central London. The Mayor set out further proposals as part of the Clean Air Action Plan announced in July 2016. They are:
- 1) Stronger LEZ – the introduction of a Euro VI requirement London-wide for heavy vehicles (HGVs, buses, coaches and other specialist vehicles) from 26 October 2020 through changes to the current London-wide LEZ; and
 - 2) Expanded ULEZ – the extension of the ULEZ emission requirements from central London up to, but not including, the North and South Circular Roads for light vehicles (cars, vans, minibuses and other light vehicles), from 25 October 2021
- 1.5 Whilst the Mayor's action on reducing emissions from vehicles is focused on the most polluted parts of the capital, i.e. central and inner London, these strengthening measures are predicted to have a significant pollution reduction effect in outer London including Croydon. The figure below is taken from the 'Ultra Low Emission Zone - Further Proposals: Integrated Impact Assessment' (2017)². It shows the predicted total population-weighted NO₂ concentrations as a percentage of the study baseline, following introduction of both the stronger London-wide LEZ and expansion of the ULEZ across inner London. It is important to note that the tighter London-wide LEZ emissions standards will now come into force from 1 March 2021. This was postponed to give affected businesses time to meet the new standards as they face intense demands from the Covid19 Pandemic. This may have some effect in relation to the 2021 predicted concentrations.

² https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-3b/user_uploads/integrated-impact-assessment.pdf

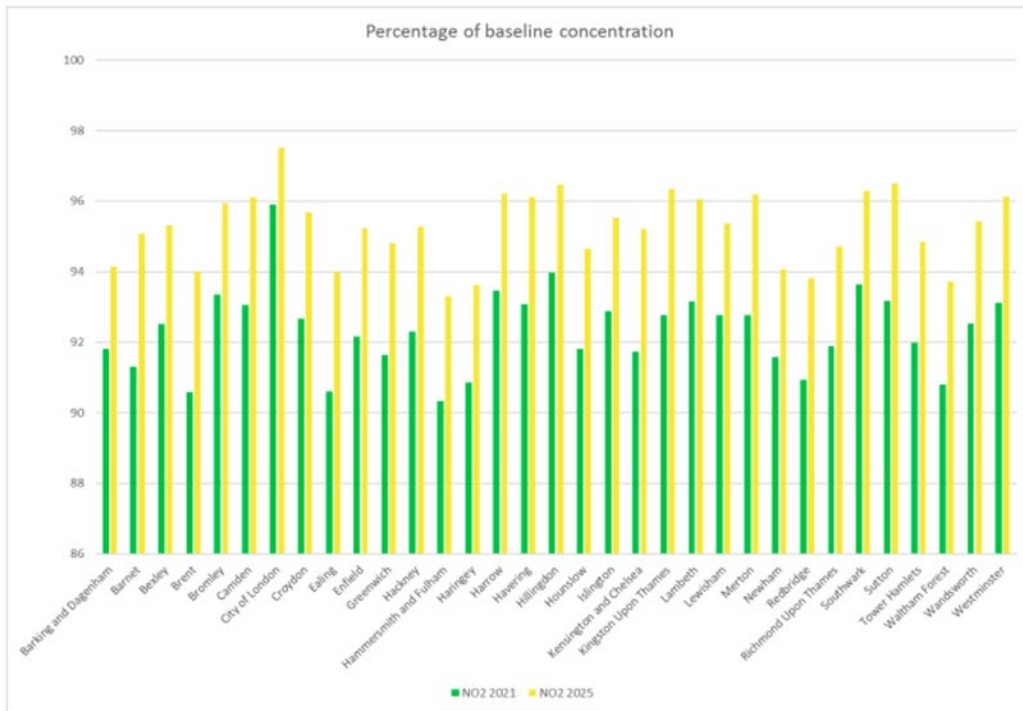


Figure 1-3: Total population-weighted NO₂ concentrations as a percentage of baseline following introduction of the additional proposals for stronger LEZ and expanded ULEZ

Health Impacts Further Policy Information

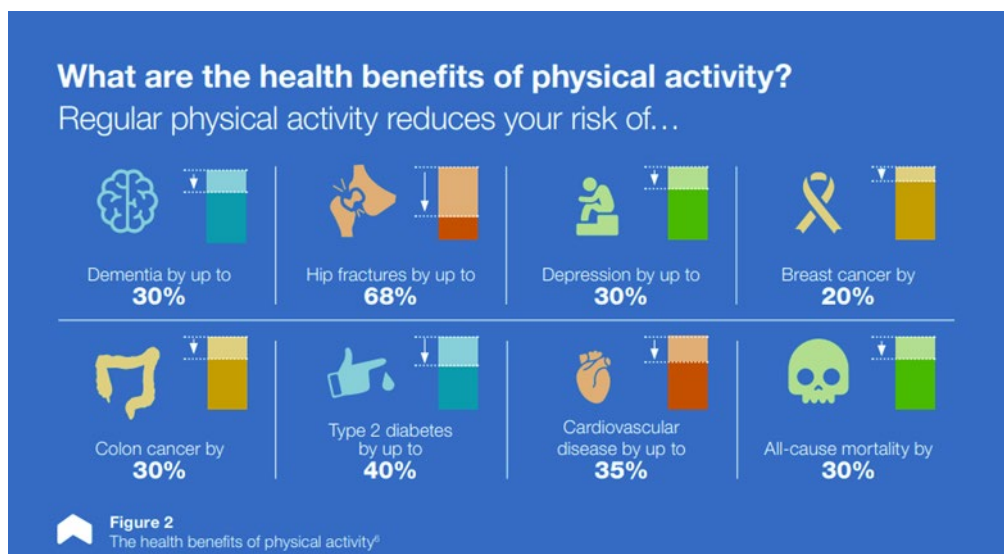
- 1.1 In his foreword to the Cycling and Walking Plan for England¹ (27 July 2020), the Prime Minister states:

'This unprecedented pandemic has also shown many of us, myself very much included, that we need to think harder about our health. We need to think harder about how we can make lifestyle changes that keep us more active and fit – the way we travel is central to this.'

The Plan explains that:

- Increasing cycling and walking can help tackle some of the most challenging issues we face as a society – improving air quality, combatting climate change, improving health and wellbeing, addressing inequalities and tackling road congestion:
- Physical activity, like cycling and walking, can help to prevent and manage over 20 chronic conditions and diseases, including some cancers, heart disease, type 2 diabetes and depression. Physical inactivity is responsible for one in six UK deaths (equal to smoking) and is estimated to cost the UK £7.4 billion annually (including £0.9 billion to the NHS alone).

It includes the summary infographic:



It sets 'a bold future vision for a new era', namely:

'England will be a great walking and cycling nation. Places will be truly walkable. A travel revolution in our streets, towns and communities will have made cycling a mass form of transit. Cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030.'

¹<https://www.gov.uk/government/publications/cycling-and-walking-plan-for-england>

Mayor's Transport Strategy and Croydon LIP

1.2 The Mayor of London's Transport Strategy '*Outcome 1: London's streets will be healthy and more Londoners will travel actively*' is expressed as Londoners doing at least the 20 minutes of active travel that they need to stay healthy each day. This is translated into a target in the Croydon LIP. The target is based on the proportion of Croydon residents doing at least 2x10 minutes of active travel a day (or a single block of 20 minutes or more). The Croydon baseline (2013/14-2016/17) is 26% of residents achieving this level of activity. The LIP target is 70% by 2041, with an interim target of 35% in 2021.

1.3 The LIP explains:

'2.2.14 Inactivity is having profound health effects and is a major contributory factor to the levels of obesity in Croydon. One in five children in the school reception year is overweight or obese and this rate more than doubles between reception and year 6. Early childhood is a critical time to tackle childhood obesity as children are developing and learning healthy or unhealthy behaviours from a young age. By year 6 (age 10 to 11 years) a greater proportion of children in Croydon carry excess weight than in London or nationally. Two in five children aged 10 to 11 years in Croydon are overweight or obese and this proportion is increasing over time.'

2.2.15 For adults the situation is more serious. A staggering two in three adults or 62% of the population are overweight or obese and one in thirty one working age people in Croydon have diabetes, a figure which is predicted to increase by 10% by 2025. Amongst older adults (over 65) one in eight are predicted to have diabetes and one in four are obese. Children in Croydon are growing up in a borough where it is normal to be overweight.'

The Croydon Cycling Strategy 2018 to 2023

1.4 The Croydon Cycling Strategy² sets out the reasons why we need to help people get cycling, the first being to help Croydon residents become fitter and healthier, as:

- more than one in three of our ten to eleven year-olds are overweight or obese
- nearly two in three Croydon adults are overweight or obese
- young people in Croydon are growing up in a borough where it's normal to be overweight

explaining that we need infrastructure and cultural changes to enable everybody to incorporate exercise into their daily travel routine.

² <https://democracy.croydon.gov.uk/documents/s5603/Croydon%20Cycling%20Strategy%202018-2023%20-%20appendix.pdf>

Croydon Council Equality Analysis Form

Stage 1

At this stage, you will review existing information such as national or local research, surveys, feedback from customers, monitoring information and also use the local knowledge that you, your team and staff delivering a service have to identify if the proposed change could affect service users from equality groups that share a “protected characteristic” differently. You will also need to assess if the proposed change will have a broader impact in relation to promoting social inclusion, community cohesion and integration and opportunities to deliver “social value”.

Please note that the term ‘change’ is used here as shorthand for what requires an equality analysis. In practice, the term “change” needs to be understood broadly to embrace the following:

- Policies, strategies and plans
- Projects and programmes
- Commissioning (including re-commissioning and de-commissioning)
- Service Review
- Budgets
- Staff structures (including outsourcing)
- Business transformation programmes
- Organisational change programmes
- Processes (for example thresholds, eligibility, entitlements, and access criteria)

You will also have to consider whether the proposed change will promote equality of opportunity; eliminate discrimination or foster good relations between different groups or lead to inequality and disadvantage. These are the requirements that are set out in the Equality Act 2010.

1.1 Analysing the proposed change

1.1.1 What is the name of the change?

Proposed Crystal Palace and South Norwood Experimental Low Traffic Neighbourhood

1.1.2 Why are you carrying out this change?

Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

The change is a response to past decisions and current trends. It is a response to the Mayor of London’s Transport Strategy (in particular the Healthy Streets objective) and his / TfL’s Streetspace Plan for London. It is a response to the continuing Covid19 Pandemic and to Secretary of State for Transport statements and guidance relating to it.

Past decisions were taken without any formal consideration of the equality implications. These include parliament in the 1930’s allowing streets to be given over to motor vehicles, the consequences of which began to be considered formally in the 1960’s. In 1961 Ernest Marples MP chaired a Steering Group for a Ministry of Transport study looking at the ‘Long Term Problem

of Traffic in Towns'. The study considered the '*Deterioration of Environment*' identifying the issues relating to '*drivers are seeking alternative routes, mainly through residential areas, in order to avoid congested areas on main roads*'. The study highlighted some of the effects this was having relating to 'age', namely children. It reported '*Journey to school. In 1962, 4,287 child pedestrians between the ages of 5 and 9 years were killed or seriously injured*'. It proposed traffic levels that were compatible with play in the street and with a reasonable quality of environment. It suggested the creation of Environmental Areas (areas free of extraneous traffic) in between the Distributor Roads which would largely need to be rebuilt as major urban highways in order to accommodate the predicted levels of traffic. This approach was clearly not fully taken forward in the UK. The response to the high road casualty rate in children age 5 to 9, has largely been to deny them access to the street and to curtail their independent mobility (unlike in the Netherlands where in response to the 'Stop Child Murder' public campaign in the 60s and early 70s, Woonerf or Living Streets in which the car is the visitor, were created).

In the early 2000s, Croydon Council led a partnership of the four Councils whose boroughs meet at the 'Upper Norwood Triangle' to deliver a Single Regeneration Budget programme. The centrepiece of the programme was a project to 'improve' the Triangle itself. Several traffic arrangements were considered. The one selected and implemented was to turn the Triangle into a one-way traffic gyratory. It was known at the time that to do so would increase the traffic going around the Triangle by around 50%. This was not because the scheme was predicted to generate more traffic, rather the same traffic would need to travel along more sides of the Triangle to get to its destination. The strategy to protect the environment within the Triangle from this increased traffic, was to use the traffic signals at each corner of the Triangle to que traffic on the approach arms to the Triangle, rather than within it. Such a strategy only works if traffic cannot find alternative routes to avoid the que, and seeks to sacrifice one 'environment' for the protection of another.

Since 2009, vehicle miles on London's streets has grown significantly. The growth has been entirely on the minor unclassified roads / streets, such that the minor street network is now carrying almost as much traffic as the A Road network.

The above changes were not subject to any formal equality assessment. The following equality analysis relates to a proposed trial project (the Crystal Palace and South Norwood Experimental Low Traffic Neighbourhood) that aims to address some of the effects arising from above.

1.1.3 What stage is your change at now?

See **Appendix 1** for the main stages at which equality analyses needs to be started or updated.

The current temporary Low traffic Neighbourhood was implemented in stages in a reactive manner as a response to the Covid19 Pandemic. Options for the future of the temporary scheme are being considered, including removal or keeping the scheme largely as is. It is proposed to move to trial LTN with camera enforced restrictions, rather than physical closures, with exemptions for vehicles belonging to residents living within the trial LTN.

1.2 Who could be affected by the change and how

1.2.1 Who are your internal and external stakeholders?

For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

The main internal stakeholders are the Council administered, Mobility Forum, the Cycle Forum, the Public Transport Liaison Panel, the Councilors for the Crystal Palace and Upper Norwood and the South Norwood wards, Cypress School, the SEN Transport Service, Public Health, the Active Lifestyles Service and Council contractors including Veolia.

External stakeholders include:

- Residents living within the proposed trial LTN area, those living on the main streets that form the edges of the trial LTN, and those living beyond the LTN.
- Businesses including those at the Upper Norwood Triangle
- Non-local authority schools namely Crystal Palace and South Norwood Harris Academies
- St John the Evangelist Church
- The Auckland Surgery
- St Pauls Church, Hamlet Road
- Transport for London
- The emergency services

1.2.2 What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

The proposed trial is a continued response to the Covid Pandemic following the Secretary of States call for continuing action to help people to walk and to cycle rather than to use public transport or to drive. It is also intended to deliver the Mayor of London's Healthy Streets objective within the trial LTN area. It is intended to provide quieter streets facilitating healthy and active travel, play and social interaction / community building. By facilitating active travel the proposal is a part of enabling people to exercise as part of their daily travel routine, to help them be a healthy weight, to stay healthy longer, to improve air quality and to help address the climate change emergency.

1.2.3 Does your proposed change relate to a service area where there are known or potential equalities issues?

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (<http://www.croydonobservatory.org/>)

Yes. It relates to:

Public Health and known health inequalities in Croydon, inequalities strongly associated with

deprivation

<https://www.croydonobservatory.org/wp-content/uploads/2016/11/JSNA-Geographical-Health-Inequalities-2009-10.pdf> and the Health and Wellbeing Strategy aiming to tackle the inequalities <https://democracy.croydon.gov.uk/documents/s13992/Health%20and%20Wellbeing%20Strategy%20-%20Final.pdf> the objectives of which include:

- Ensure children and young people have the best physical and emotional environments for growing up.
- Reduce health inequalities by developing strong, inclusive and well-connected communities.
- Make improving mental health and wellbeing everyone's business.
- Get more people more active, more often. Reducing social isolation and driving improvement in health through social, cultural and physical activities.
- Support people to remain healthy and independent for longer by preventing the conditions that cause ill health.

Air Quality Management and the known (largely age related) inequalities relating to poor air quality. The Mayor of London's Environment Strategy tells us that:

- 'Human health is affected by poor air quality. This is particularly true for disadvantaged people like children, older people, and those with pre-existing health conditions.'
- '... younger children are among the most vulnerable to its health impacts. Eight and nine year-olds living in cities with high levels of fumes from diesel cars have up to ten per cent less lung capacity than normal.'
- '... air pollution has a big impact on health at all life stages, from development in the womb to the end of life. A baby born in 2010 and exposed to that same level of air quality for its entire life would lose around two years of life expectancy. There is also strong evidence that poor air quality affects children's lung development, and emerging evidence that improving air quality can reverse those effects. There is also increasing evidence of the link between exposure to pollution and dementia.'

Hence the relevance of the Council's Air Quality Management Plan

<https://www.croydon.gov.uk/environment/pollution/air-pollution/final-air-quality-action-plan-2017>

and in particular the action:

- 'Provision of infrastructure to support walking and cycling '

Climate Change and Croydon being Carbon Neutral by 2030

<https://www.croydonclimate.org.uk/about-croydon-climate-crisis-commission> . Unlike older people, those who are children and young people today will increasingly experience the effects of Climate Change.

Transport Planning

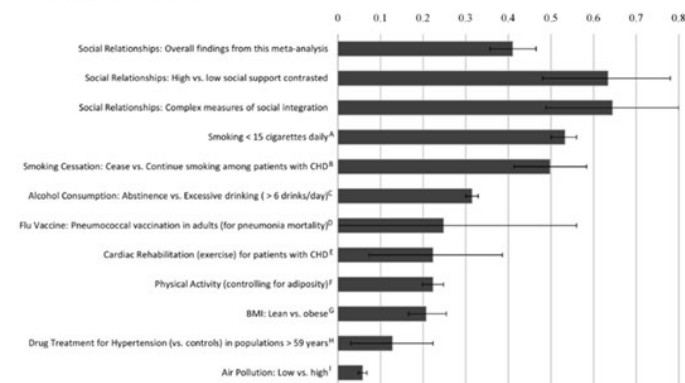
Cycling is potentially available to nearly all. TfL has assessed Croydon having the greatest Cycling Potential (largest number of journeys that could be cycled) of all London boroughs. However, Croydon has the lowest cycle mode share of all the London Boroughs at 1%. Consequently a lot of Croydon people from all groups are being denied the health, access an economic benefits of cycling.

Social Relationships and Mortality Risk: A Meta-analytic Review

Figure 6

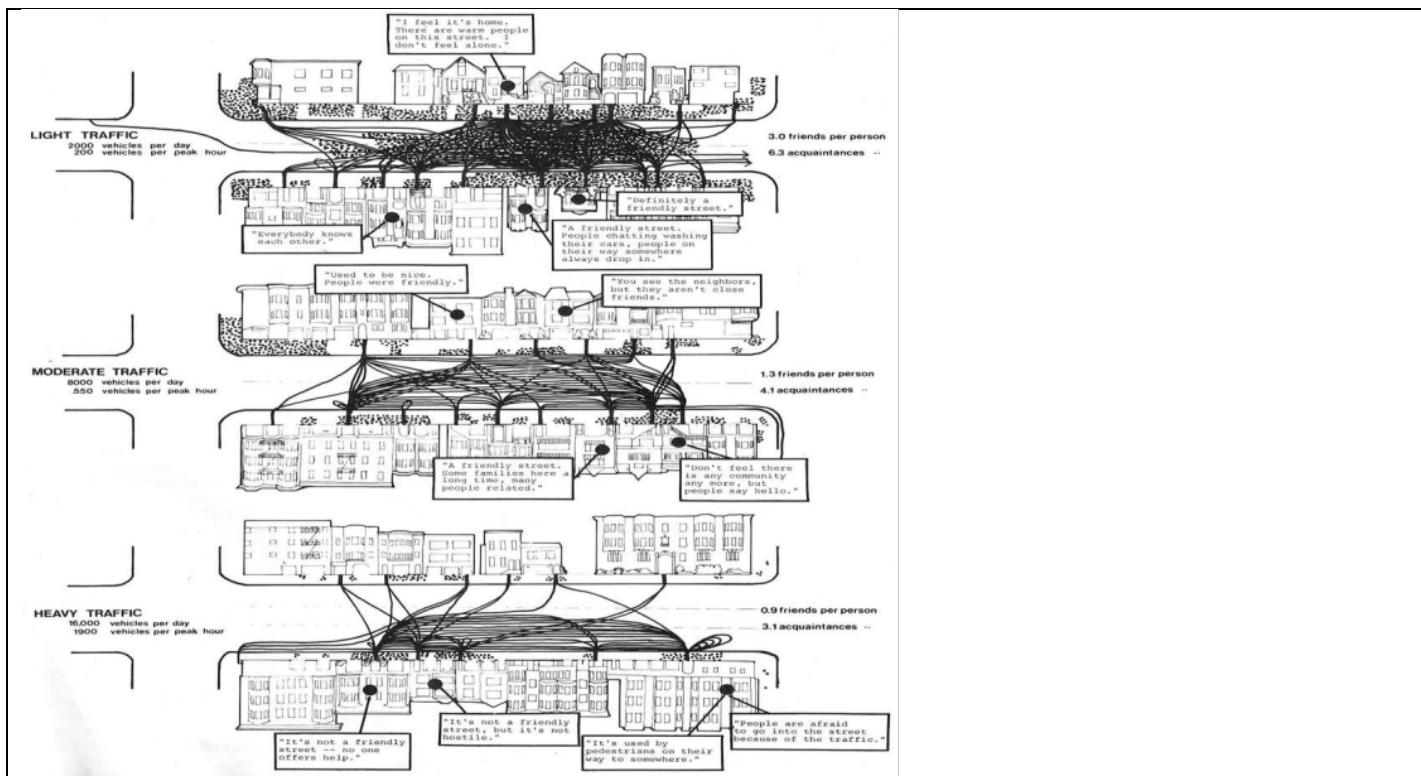
Comparison of odds (NOR) of decreased mortality across several conditions associated with mortality

Note: Effect size of zero indicates no effect. The effect sizes were estimated from meta-analyses: A = Shavelle, Paolitto, Strauss, and Kush, 2009 [205]; B = Critchley and Capewell, 2003 [200]; C = Hopkins, Englin, Mine, and Winter, 1998 [207]; D = Fine, Smith, Carzon, Maffe, Sankaj, Weasfield, Detsky, and Kapoor, 1994 [203]; E = Taylor, Biran, Ebrahim, Joffe, Noorani, Rees et al., 2004 [209]; F, G = Kitzmarzyk, Janssen, and Arden, 2003 [210]; H = Insua, Sacks, Lau, Reisman, Pagano, and Chalmers, 1994 [211]; I = Schwartz, 1994 [212].

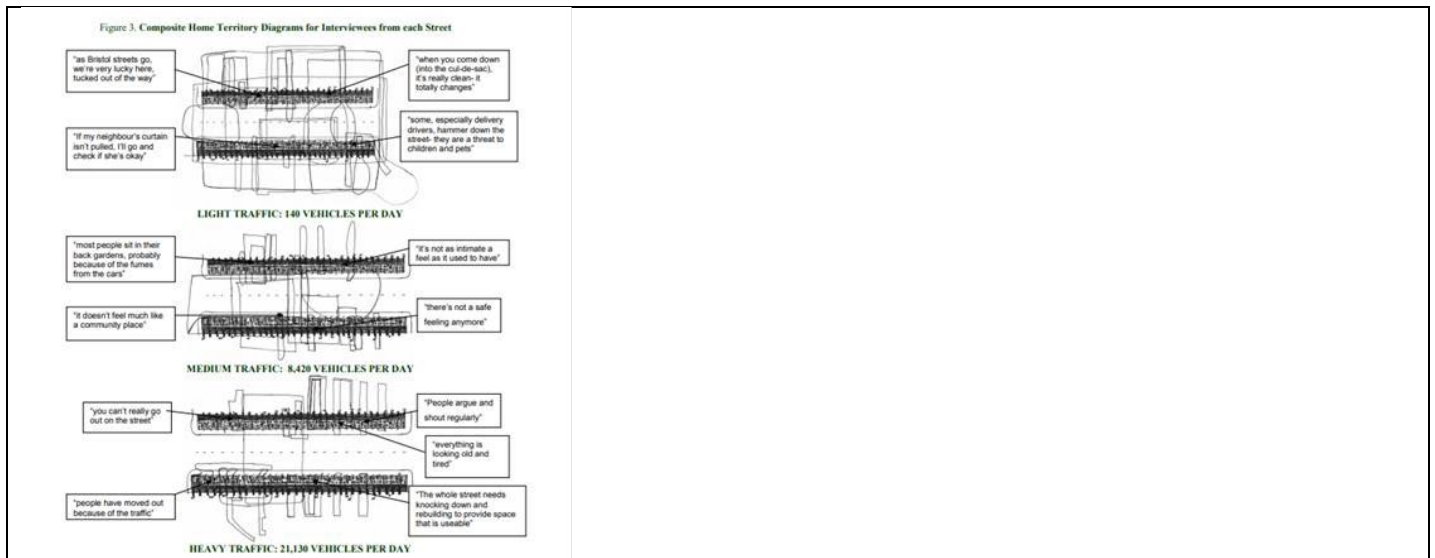


doi: <https://doi.org/10.1371/journal.pmed.1000316.g006>

The number of social relationships in turn is influenced by the speed and volume of traffic in the street where a person lives. Donald Appleyard as far back as 1969, demonstrated that people living on a street with relatively heavy traffic had only one-third as many social connections as people living on a relatively light-traffic street. Subsequent studies investigated street design, traffic, and neighbourhood quality of life; work that culminated with the publication of *Livable Streets* (Appleyard, 1981). *Livable Streets* revealed the social impacts of motor traffic in fine detail through interviews and street observations, demonstrating that casual conversations, children's play, and other street-based social life tend to be suppressed, particularly as vehicle volumes and speeds increase. The 1969 study included the iconic diagram which visually represented the erosion of social interaction as traffic volumes increase.



A decade ago, researchers replicated Appleyard's methodology in Bristol producing the report 'Driven To Excess: Impacts of Motor Vehicles on the Quality of Life of Residents of Three Streets in Bristol UK'. They reported that quality of life in cities and towns is of increasing concern to the public, and to policymakers and a major threat to quality of life is the high volume of motor vehicle traffic, associated with a wide range of mental and physical health detriments. The results confirmed that Appleyard's findings are applicable to the UK in the 21st century; specifically that the number of friends and acquaintances reported by residents was significantly lower on streets with higher volumes of motor traffic. The extent of people's 'home territories' also diminished as motor traffic increased. Other notable outcomes from the research include the finding that individuals' perceptions of road safety in their neighbourhood may be disproportionately influenced by the traffic conditions on their street of residence, especially affecting the degree of independence granted to children.



TfL's 'Attitudes Towards Walking: Segmentation Study' (2014)

<http://content.tfl.gov.uk/attitudes-to-walking-2014-summary.pdf> reports on the key 'drivers' of walking. These are gender, age & lifestage, car ownership, income and whether live in central, inner or outer London, concluding:

- I Females travel more stages per day and walk more stages per day compared to males, although females travel and walk a shorter distance per stage compared to males

- I People aged 20-44 walk more stages per day than older people

- I Combining age and gender makes the differences greater (see Figure 2):

- Females aged 20-44 walk the most stages per day. There is a particular difference in walking activity between females and males aged 35-44

- I Lifestage appears to be a key differentiating factor:

- Single adults, with or without children, walk more stages per day than adults in couples

- I Further differences are seen by gender

- Males in a couple with children walk the fewest stages per day, particularly compared to single adult males

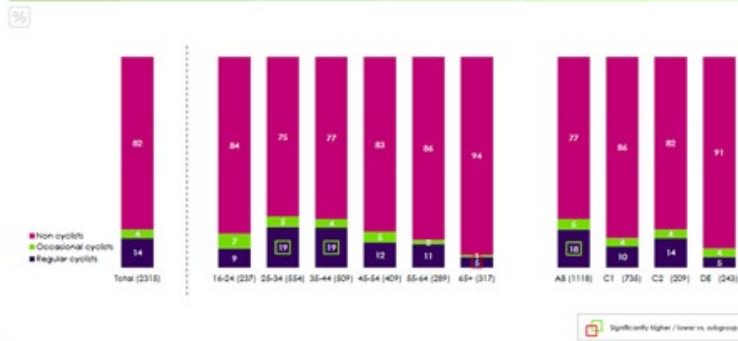
- Females with children, either in a couple or single, walk more than those without children

TfL undertook an annual Attitudes Towards Cycling survey <http://content.tfl.gov.uk/attitudes-to-cycling-2016.pdf> which contains a good many indicators relating to gender, age ethnicity

Profile of cyclists (Sept 2016)



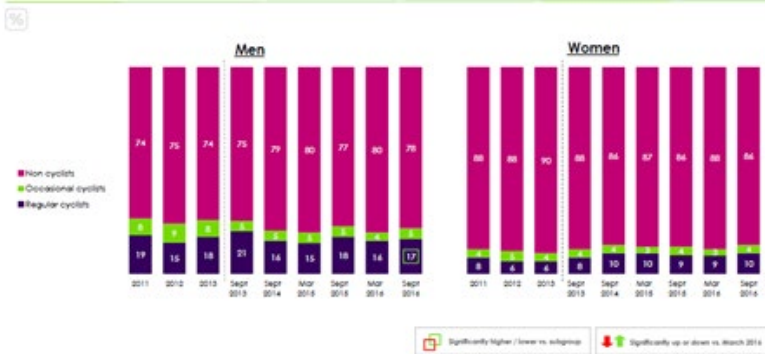
Profile of cyclists (Sept 2016)



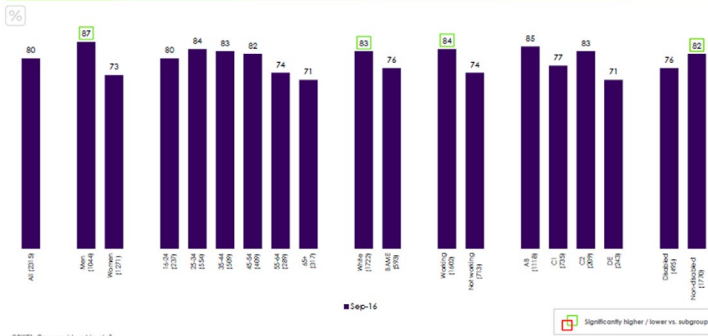
Demographic questions
Base: All - Sept 2016

33

Profile of cyclists (trend)



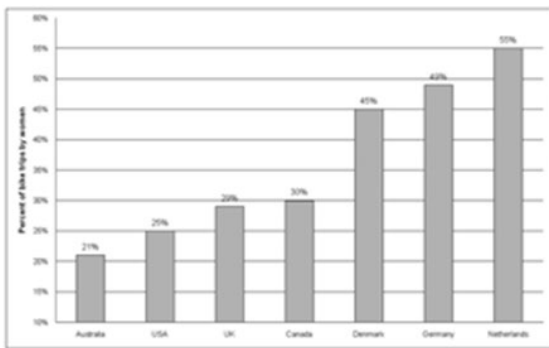
Percentage able to ride a bike (Sept 2016)



QRIE1: Can you ride a bicycle?
 Base: All respondents Sept 2016 (2310)

Significantly higher / lower vs. subgroup

The study **'Making Cycling Irresistible: Lessons from The Netherlands, Denmark and Germany'**, JOHN PUCHER and RALPH BUEHLER (2008) looked at gender and age differences in cycling across countries. On the difference rates of cycling amongst men and women, the study reported that not only do the Netherlands, Denmark and Germany have high and growing levels of cycling, but their cyclists comprise virtually all segments of society. Women are just about as likely to cycle as men, making 45% of all bike trips in Denmark, 49% in Germany and 55% in the Netherlands.



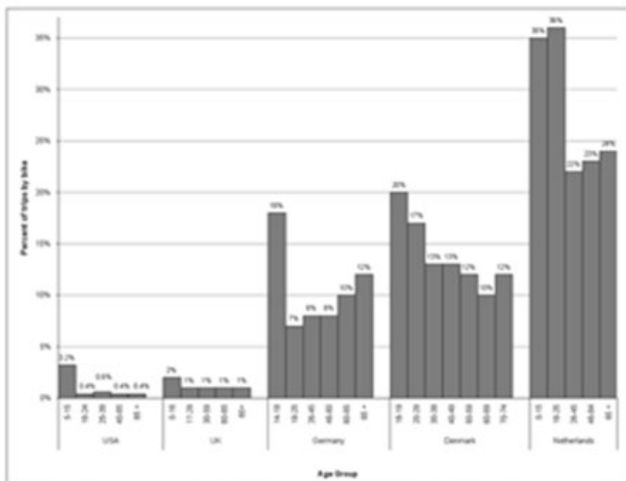
Source: German Federal Ministry of Transport (2007); U.S. Department of Transportation (2007); Danish Ministry of Transport (2007); Statistiek Nederland (2007); Australian Bureau of Statistics (2007); Department for Transport (2007) and information provided directly by bike planners in Canadian provinces and cities

Figure 8. Women's share of total bike trips in Australia, the USA, the UK, Canada, Denmark, Germany and the Netherlands (2000-2005).

While cycling is gender-neutral in those three countries, men dominate cycling in the UK and the USA, where they make 72% and 76% of all bike trips, respectively.

Regarding 'age' the study reported that another dimension of cycling's universality in the Netherlands, Denmark and Germany is the representation of all age groups. Children and adolescents have the highest rates of cycling in almost every country. As shown in Figure 9, however, cycling levels in the Netherlands, Denmark and Germany remain high even among the elderly. In Germany, the bike share of trips rises steadily from 7% among 18- to 24-year olds to 12% for those 65 and older. The bike share of trips declines with age in Denmark, but even among those aged 70–74 years old, cycling accounts for 12% of all trips, the same as among Germans who are 65 and older. The Dutch elderly double that percentage, making 24% of all their trips by bike. Cycling rates are low for all age groups in the USA, but they also decline with age: from 3.2% among children 5–15 years old to only 0.4% of trips for those 40 and older. Similarly, the bike share of trips falls from 2% among British children to 1% among older age groups. The bike share of trips for the Dutch elderly is 24 times higher than for British elderly. The bike share of trips for

both the German and Danish elderly is 12 times higher than for British elderly.



Sources: German Federal Ministry of Transport (2003); U.S. Department of Transportation (2003); Danish Ministry of Transport (2005); Statistics Netherlands (2005); Department for Transport (2007)

Figure 9. Bicycling share of trips by age group in the USA, the UK, Germany, Denmark and the Netherlands (2000-2002).

Age Differences in Independent Mobility

The Policy Studies Institutes study 'Children's Independent Mobility: A Comparative Study in England and Germany 1970 – 2010'

http://www.psi.org.uk/images/uploads/CIM_Final_report_v9_3_FINAL.PDF

reported on the dramatic decline in children's independent mobility in England relative to Germany and the psychological and other consequences this was having for English children. The study also looked at race and gender difference in children's independent mobility.

The Policy Studies Institute (and others) has continued to research this topic including a study <https://www.nuffieldfoundation.org/project/independent-mobility-and-child-development-2> which looked at the degree to which children of different ages have the freedom to travel to school, friends, shops and other destinations unaccompanied by adults across ten countries in order to identify factors affecting the independent mobility of children and the implications for child development.

Summary of results

- Overall, Finland is the top-performing country across almost every independent mobility indicator in this study, coming second only to Germany for children's self-reported freedom to travel on local buses alone.
- In 2013, Unicef published a comparative overview of child well-being across twenty-nine OECD and EU countries (Unicef, 2013) using national data from 2009 and 2010, coinciding with the start of data collection for this study of children's independent mobility. The Policy Studies Institute report found that there is a positive correlation between Unicef well-being scores and the rank scores measuring children's degree of freedom to travel and play without adult supervision in these countries. There is also a positive correlation between the education attainment of children, based on national Programme for International Student Assessment (PISA) rankings in 2009 and children's degree of freedom to travel and play without adult supervision in these countries.
- Of the three factors examined, traffic seems to be the strongest factor affecting the granting of independent mobility, with 'strangers' showing a weak effect and community supervision not being a factor. However, the correlation between traffic deaths and the

ranking of countries for independent mobility is weak. On the other hand, almost all of the countries with the highest levels of children's independent mobility have national policies to promote walking or cycling, and the local authorities in these countries are permitted to set lower speed limits than those defined at the national level.

Arising from the research findings and discussion, the report makes four observations and seven recommendations.

Observations

1. Unsafe environments for children are widely tolerated
2. Withholding independent mobility may only defer risk to older children
3. Action is needed to address parental concerns, road user behaviour, the physical environment, social and cultural factors
4. Change in transport policy and behaviour may be resisted but it actually happens all the time

Recommendations

1. Implement and enforce stringent road safety measures
2. Reduce car dependency and the dominance of traffic in the public realm
3. Put the needs of children at the heart of urban development ' cities that work for children, work for everyone
4. Explicitly incorporate children's independent mobility into policy
5. Adopt Daylight Saving Time to allow children to better utilise daylight hours and reduce road casualties
6. Invest in research to consolidate and develop knowledge on children's independent mobility
7. Create a national challenge fund to catalyse and drive action to improving children's independent mobility

Cycling by People with a Disability

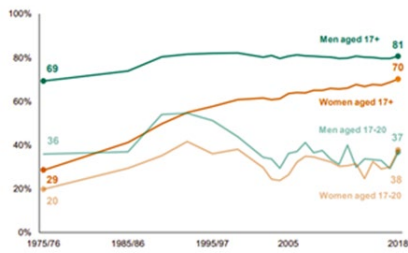
The Wheels for Wellbeing annual survey 'Assessing the needs and Experiences of Disabled Cyclists' (2018) <https://wheelsforwellbeing.org.uk/wp-content/uploads/2019/04/Survey-report-FINAL.pdf> was based on responses from over 200 disabled cyclists across the UK. It reports that 72% of disabled cyclists use their bike as a mobility aid, and 75% found cycling easier than walking. Survey results also show that 24% of disabled cyclists bike for work or to commute to work and many found that cycling improves their mental and physical health. Inaccessible cycle infrastructure was found to be the biggest barrier to cycling.

Age and Gender Difference in Travelling

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/823068/national-travel-survey-2018.pdf

In England as a whole, the percentage of women having a driving licence has increased considerably since the mid 1970's but is still below the percentage of men. The trend is different amongst the youngest drivers.

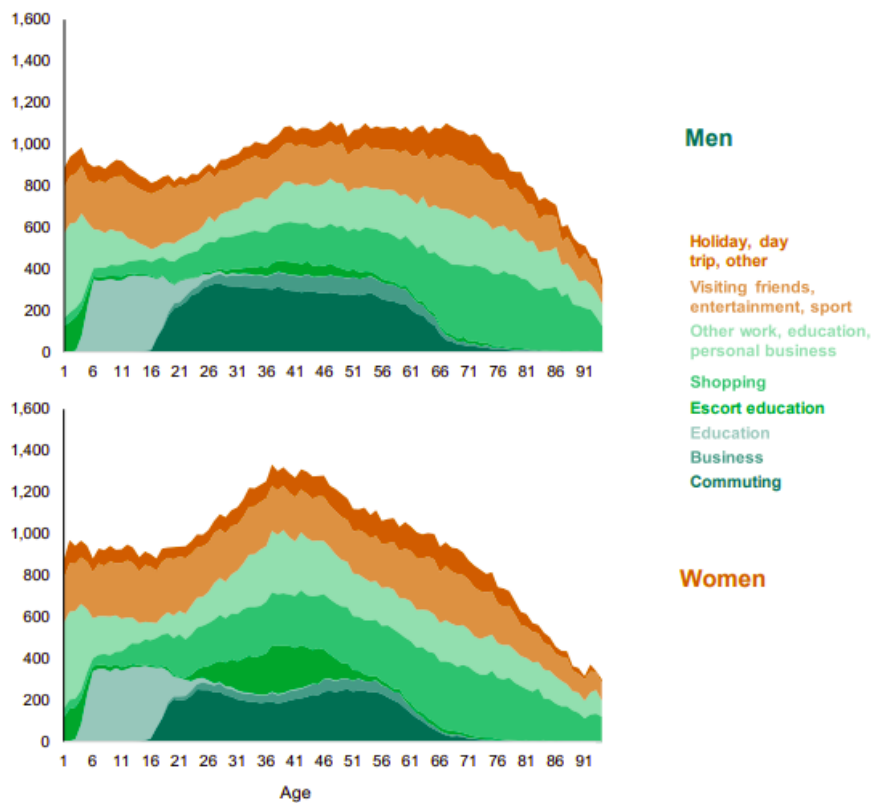
Chart 5: % of people owning a full driving licence: England 1975/76-2018 [NTS0201]



Older women make fewer journeys than older men. Women make more journeys escorting children to education

Chart 22: Average trips per person per year, by purpose, age and gender: England 2002/2018 average [based on NTS0611]

Trips per person per year



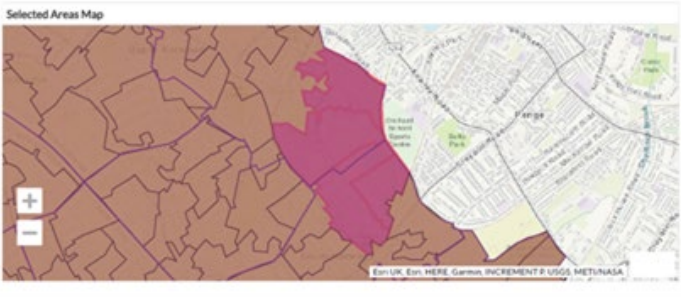
'Young People's Travel – What's Changed and Why? Review and Analysis' (2018)

<https://www.gov.uk/government/publications/young-peoples-travel-whats-changed-and-why>

Young adults (age 17 to 29) in Great Britain and other countries are driving less now than young adults did in the early 1990s.

1.2.5 Area Baseline: The Croydon Observatory Custom Area Reporter enables selected information to be extracted based on small output areas. Those areas cannot exactly equate to the area of the notional boundary of the temporary and proposed trial LTN. The areas selected /

approximating to the LTN and for which data have been extracted, are indicated below in purple.

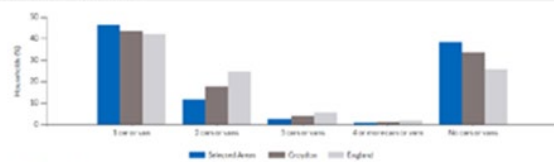


Car Availability

39% of households have no car available



Number of cars or vans per household



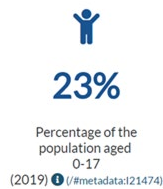
Source: IPAG Census 2011

	Selected Areas		Craydon		England	
	Count	%	Count	%	Count	%
1 car or van	1,374	46.6	63,583	43.6	9,301,776	43.2
2 cars or vans	317	11.6	25,836	17.8	5,441,592	24.7
3 cars or vans	68	2.5	5,571	3.8	1,203,865	5.5
4 or more cars or vans	23	0.8	1,897	1.3	424,883	1.9
No cars or vans	1,052	38.5	48,523	33.5	5,891,251	27.8

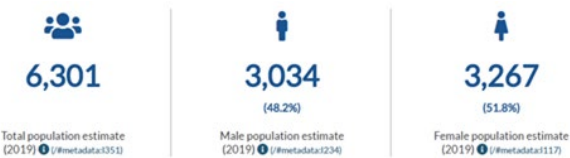
Health and Disability

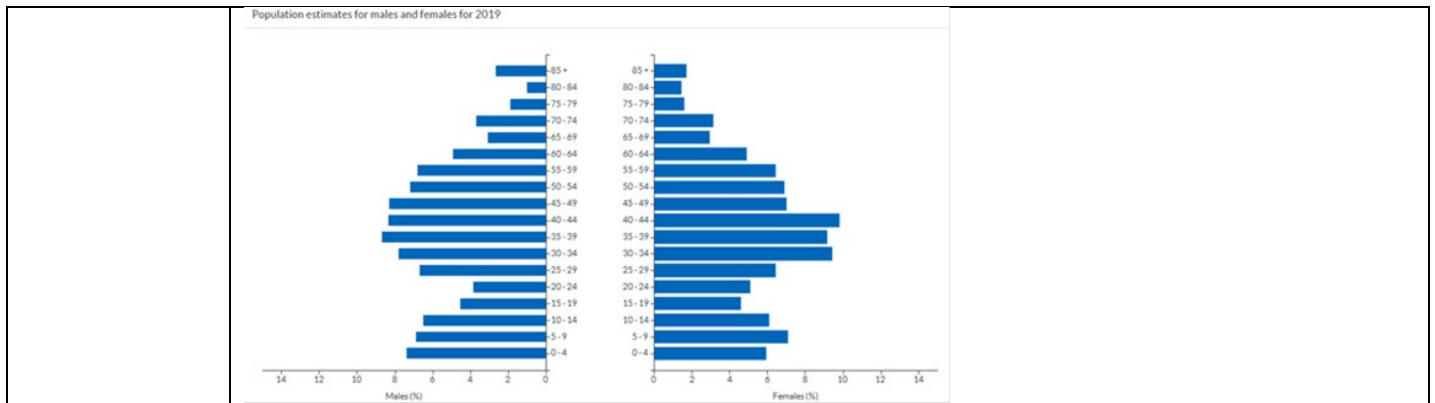


Age

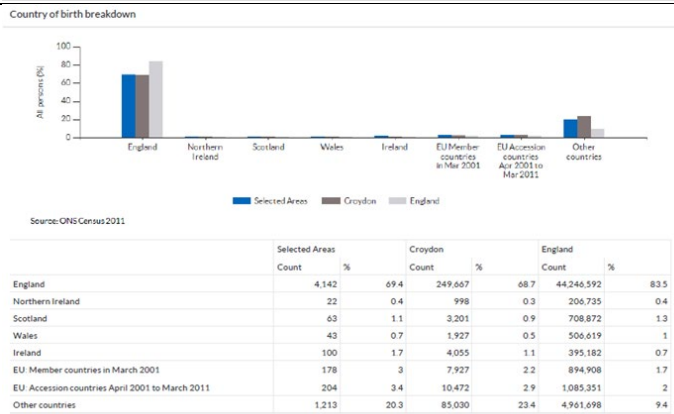


Gender





Race and Ethnicity



1.2.6 Analyse and identify the likely advantage or disadvantage associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	Under the proposed trial, residents living within the notional LTN area, having a car registered to their home address and needing to use a car, will be able to use their car with the same ease they enjoyed before the temporary LTN was introduced.	In 2011, the percentage of people living in the area with very bad health or whose activity was limited a lot, was 7%. The proposal is intended to help people choose to travel actively to help stay healthy longer. For those that already are in very bad health and needing care, the proposed trial restriction

	<p>A number of people and the Auckland Surgery have pointed out the need for some older and disabled residents living outside of the LTN area to access the Surgery by car. By moving the bus gate to be by the Surgery, patients will be able to drive to it from either direction in Auckland Road.</p> <p>People with disabilities who currently cycle will be aided by the proposal as will those that do not currently cycle but would like to.</p> <p>Users of the Disabled Persons Freedom Pass should enjoy a quicker and more reliable journey on the 410 as it passes through the trial LTN area. TfL's monitoring of the Temporary scheme suggests that buses on routes bounding the Temporary LTN were not significantly affected by the temporary scheme, compared to the effect of the temporary scaffolding in Church Road.</p> <p>Users of Dial-a-Ride and SEN Transport buses, and people with a disability using Community Transport, should have a quicker and more reliable journey via Auckland Road.</p> <p>Taxicard users will have an improved journey via Auckland if in a Taxi. If in a Private Hire vehicle, they will not be able to pass through the 'bus gate' necessitating a different route.</p>	<p>on motor vehicles includes an exemption for district nurses. However, not all carers will be provided with an exemption and for some accessing particular premises by car will require a longer route.</p> <p>People with a disability living beyond the trial LTN area, reliant on cars for travel, needing to access premises within the trial LTN area, may have to take a longer route compared to those walking, cycling or using the 410 bus.</p> <p>People with a disability living beyond the trial LTN area, reliant on cars for travel who previously used Auckland Road to avoid congestion on the A Roads, would not be able to. However in this respect, they would not be disadvantaged relative to non-disabled people living beyond the LTN.</p> <p>Users of Dial-a-Ride and SEN Transport buses, and people with a disability using Community Transport, may have an increased journey time, if the journey previously involved going via streets that will be subject to the 'No Motor Vehicle' restrictions.</p> <p>SEN Transport drivers using cars, and Private Hire cars hired for SEN Transport will not be able to pass through the 'No Motor Vehicle' restrictions</p>
Race/ Ethnicity	None specific (see community Cohesion)	None specific
Gender	TfL's Attitudes to Walking study indicates that women travel more stages per day and walk more stages per day compared to men, although women travel and walk a shorter distance per stage compared to men. Men and women should both be helped by	None specific

	<p>the improved walking environment, but helped differently. Women helped to make the more frequent but shorter trip stages they walk.</p> <p>Both the TfL Attitudes to Cycling research and Sustrans' 'What Stops Women Getting on Their Bikes' study, report that fear of road danger is the biggest thing deterring women cycling. Providing quieter and safer street space is intended to address this.</p>	
Transgender	None specific	None specific
Age	<p>The proposed trial is intended to create a network of quieter and safer streets to foster walking and cycling. Children and young people are amongst those likely to be benefiting the most. A quarter of the population in the Trial LTN area is under the age of 18 and consequently cannot drive. Many will be living in the households in the area which do not have access to a car or a van. Nationally, young adults are significantly less likely to hold a driving licence and driving less than they did in the past. Aiding walking and cycling including to public transport will benefit this group.</p> <p>Children are the group whose independent mobility has been curtailed the most as streets have been taken over by more and more cars. Providing quieter and safer streets provides space in which children can more easily regain their independent mobility, play and socialise. The same quieter streetspace can help them get a little closer to the levels of cycling seen amongst their north European counterparts.</p> <p>Quieter streets may well be a factor in enabling older people to keep cycling or to choose cycling</p>	None specific. Disadvantage may be Disability related. See 'Disability above'

	<p>and could help the percentage of cycle trips made by older people get a little closer to some of those in northern Europe, something made feasible at Crystal Palace my modern E-bikes.</p> <p>The degree to which children's access to active travel and to play in the street puts them at risk of being overweight and associated medical conditions, both in childhood and later in life. Behaviours (including travel behaviour) learnt in childhood are often taken into later into life. Facilitating active travel in early life is part of ensuring good health as an adult and older adult.</p> <p>The Mayor's Healthy Streets objective is a key part of his approach to tackling climate change. Those that are young today, are the ones that will be experiencing the worst effects of climate change when older adults.</p> <p>As people get older, particularly beyond the age of 70 when the driving licence has to be renewed every five years, fewer may have driving licenses / be driving.</p>	
Religion /Belief	None specific	None specific
Sexual Orientation	None specific	None specific
Pregnancy and Maternity	Information has not been found specifically relating to Pregnancy and Maternity. However TfL's Attitudes Towards Walking research indicates that women with children, either in a couple or single, walk more than those without children, and it is likely that amongst these women, some will be pregnant and / or in maternity	Some women in the latter stages of pregnancy, may feel walking is difficult, but If they have a car available may still be able to drive. Those living outside of the trial LTN area but needing to reach premises within the LTN may have an extended driving route / journey time but will still have access.
Social inclusion issues	The work of Appleyard in the 1960s and replicated in Bristol a decade ago shows how the number of friends and acquaintances a resident of a	Many living outside of the trial LTN may wish to drive to visit a friend or relative living within the LTN. If they chose to do so, they will still be able to do so, but the journey time /

	street has declines, as the volume of traffic increases. Creating a quieter and calmer street environment is a means of increasing social inclusion and reducing isolation.	distance might be increased.
Community Cohesion Issues	See above. The street has historically been where much of the life of the town/city takes place. It was community space which also happened to have a movement function. Lowering traffic levels has the potential for the role of the street as community space to return to a degree depending on the residual traffic level. This in turn fosters community cohesion and enables the fostering of good relations between members of groups with protected characteristics and others (something difficult to achieve if everyone travels to and from their own home, in their own car).	See above
Delivering Social Value	The trial project is intended to support delivery of the Mayors Health Streets objective, in turn delivering value and savings in relation to mental and physical health	None

1.2.7	<p>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</p> <p>For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation</p>
--------------	--

Crystal Palace is at the top of a hill. There is likely to be need for additional action to help people consider the use of E-Bikes.

1.2.8	<p>Would your proposed change affect any protected groups more significantly than non-protected groups?</p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....</p>
--------------	---

Yes. The project is intended have a significant positive effect on children and young people.

1.2.9 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do not?

In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes *etc.*

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

Yes. The project is intended to increase the opportunity for children to travel independently and to socialise and play.

1.2.10 As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?

In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

Do Not Know. No means have been identified by which the trial scheme might help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic.

1.2.11 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?

In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation *etc.*

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Yes. The proposed change has the potential to very strongly help foster good relations between people who belong to most of the protected groups and those who do not, by better enabling friendships and acquaintances to develop in streets with less traffic, and enabling the street to regain some of its historic community space function.

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
<p>No, further equality analysis is not required</p>	<p>Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	
<p>Yes, further equality analysis is required</p>	<p>Please state why and outline the information that you used to make this decision. Also indicate</p> <ul style="list-style-type: none"> • When you expect to start your full equality analysis • The deadline by which it needs to be completed (for example, the date of submission to Cabinet) • Where and when you expect to publish this analysis (for example, on the council website). <p>You must include this statement in any report used in decision making, such as a Cabinet report.</p>	<p>This document is the start of the Equality Analysis. The Analysis should be informed by research conducted during the trial, research focused on the experiences of those of groups with protected characteristics predicted to be affected by the trial.</p> <p>There should be a dialogue with Dial-A-Ride, Community Transport and SEN Transport operators and with users to help refine the operation of the trial and this Analysis.</p> <p>The Croydon Mobility Forum has been unable to meet during the Pandemic. The Forum should be engaged with during the operation of the trial, its views</p>

Decision	Guidance	Response
		<p>informing the Analysis, the operation of the trial and the design and operation of any scheme that might follow the trial</p> <p>The Equality Analysis should be concluded before any decision is made on the outcome of and the future for the trial and should be published as part of the documents used in making the recommendation.</p>
Officers that must approve this decision	Name and position	Date
Report author	Ian Plowright, Head of Transport	9/12/2020
Director	Steve Iles, Director of Public Realm	18/12/2020

1.4 Feedback on Equality Analysis (Stage 1)

Please seek feedback from the corporate equality and inclusion team and your departmental lead for equality (the Strategy and Planning Manager / Officer)

A Full analysis is required because we already know that the change could have a different / significant impact on individuals with disabilities. A full analysis will enable us the Council to ensure the decision is informed by research conducted during the trial, research focused on the experiences of those of groups with protected characteristics predicted to be affected by the trial. This will provide the opportunity for those most likely to be impacted by the trial to informing the Analysis, the operation of the trial and the design and operation of any scheme that might follow the trial

Name of Officer	Yvonne Okiyo	
Date received by Officer	16.12.20	Please send an acknowledgement
Should a full equality analysis be carried out?	Yes	.



Chief Executive's Department
Civic Centre, Stockwell Close, Bromley, BR1 3UH

Telephone: 020 8464 3333
Direct Line: 020 8313 4197
Internet: www.bromley.gov.uk
Email: ade.adetosoyeCE@bromley.gov.uk
Our Ref: AA/pje/Kerswell-CPLTN 110121

Katherine Kerswell
CEO
Croydon Council

Via email to:
Katherine.Kerswell@croydon.gov.uk

11th January 2021

Dear Katherine

Crystal Palace LTN

Officers and Members at Bromley have now had a chance to read the report being presented to Croydon's Traffic Management Advisory Committee (TMAC) on Tuesday, regarding the Crystal Palace LTN:

https://democracy.croydon.gov.uk/documents/s26662/TMAC%2012%20Jan%20LTN_Finalv2.pdf

Our comments to this report are set out below and I would be grateful if you can ensure that these are presented to the TMAC for their consideration prior to reaching any decision on Tuesday evening.

It appears that although the overwhelming response to the consultation is in favour of all measures being removed, the recommendation is that the current scheme should remain but be enforced with ANPR instead of barriers. We appreciate that this will allow residents of the LTN, district nurses and emergency services vehicles to pass through, but not any other traffic. However, this outcome would not help the residents of the Bromley streets that have been so negatively affected.

We understand that the consultation was not a referendum, but it appears that the public responses have been discounted entirely.

Section 5.12 of the report states:

"Those living within the area of the Temporary LTN that responded, did so in the following ways:

Introduction of ANPR enforced LTN:

- *Agree or Strongly Agree with implementing an ANPR solution: 392 (26%)* •
- *Disagree or Strongly Disagree with implementing an ANPR solution: 951 (62%)*

Should the scheme remain in its current format?

• Agree or Strongly Agree with the scheme remaining: 236 (15%) • Disagree or Strongly Disagree with scheme remaining: 1,136 (75%)

Should the scheme be removed in its entirety?

• Agree or Strongly Agree with removing the scheme: 932 (61%) • Disagree or Strongly Disagree with removing scheme: 345 (23%)

In summary, of those living within the LTN area that responded, 75% disagreed with scheme remaining and 62% disagreed with the implementation of an ANPR enforced LTN. However this only represents the views of people in around 25% households in the LTN area, the majority of people did not provide a response suggesting that they don't have a particular view on this scheme."

Section 2.6 of the report states:

"A Total of 4315 responses to the main consultation were received (and analysed) from across London (and wider). The consultation demonstrating what the Secretary of State for Transport has called 'the noise and passion schemes can generate'. It has not achieved what the Secretary of State is asking for in terms gathering a 'truly representative picture of local views'. The views received are from much wider than the 'local'. The population sample does not reflect the population within the Temporary LTN Area especially in terms of age profile and ethnicity. The Secretary of State reminds us that consultation 'should not be confused with listening only to the loudest voices or giving any one group a veto'."

So despite a reasonable response rate at 25%, with the majority wishing to see the scheme removed entirely, the recommendation is to discount these responses.

Bromley is aware of the strength of feeling of residents in the area who see no benefit from the scheme and only experience a negative impact. The impact on Bromley residents is, of course, of particular concern.

The formal position of Bromley Council on this matter is that we would wish to see the scheme removed in its entirety, due to the ongoing negative impacts on traffic flow and congestion in some streets within the LTN (e.g. Milestone Road, Patterson Road, Cintra Park) and on the perimeter of the scheme (Anerley Hill), whereby ongoing congestion is likely to lead to an overall decrease in air quality for residents in this road and nearby. As such, we would respectfully suggest that until such times as studies have been undertaken into air quality along the A214 corridor, the existing scheme is removed and the proposed new ANPR scheme is not implemented, until such time as the impact on air quality is known.

Thank you for your attention to this matter.

Yours sincerely

Ade Adetosoye

Ade Adetosoye OBE
Chief Executive



HOUSE OF COMMONS

LONDON SW1A 0AA

Councillor Muhammad Ali
Cabinet Member for Sustainable Croydon
Croydon Town Hall
Katharine Street
Croydon CR0 1NX

Our Ref: ZA59808

11 January 2021

Dear Muhammad

Crystal Palace Low Traffic Neighbourhood

Last year the Council launched a consultation on the Crystal Palace Low Traffic Neighbourhood (LTN). The temporary scheme was highly controversial locally and the Council was right to ask people living in the area whether they want to keep the scheme, remove it, or change it to an Automatic Number Plate Recognition (ANPR) scheme.

The consultation has now ended with 25.29% of residents responding. This is a high turnout for a traffic scheme consultation which would usually expect a 10-15% response rate. It is also a higher turnout than in the two by-elections since 2018 that elected councillors for Fairfield Ward (22.77%) and Norbury Pollard's Hill Ward (25.26%). Given that this was a high enough turnout to elect councillors, it is disingenuous of the Council report to imply the higher turnout achieved in the consultation does not fairly reflect local opinion.

The results of the consultation from people living in the LTN zone were:

- 26% in favour of changing the scheme to ANPR
- 15% in favour of retaining the existing scheme
- 61% in favour of removing the scheme entirely

It is important for the Council to listen to local people and act on what they say, and in this case you have a very clear response from residents asking you to remove the scheme.

Many residents I've spoken to who oppose the current scheme want to find a better way to reduce traffic and emissions. I suggest that the Council engages in a deliberative process with residents to discuss with them what aspirations they have for their neighbourhood including how best to manage local traffic flows, what levels of local and outside traffic are acceptable to them, and how to reduce emissions to combat climate change as part of this. There are plenty of tried and tested ways to run such a process, which might include a local citizens' assembly or engaging a local community group to run a fully open consultation without preconceived options.

I hope the Council will choose to work with residents in this constructive way to improve their neighbourhood, but in the meantime I trust the Council will follow the clearly expressed views of local people and remove the current scheme.

With best wishes

A handwritten signature in black ink that reads "Steve Reed".

Steve Reed MP

Cc: Cllr Hamida Ali, Cllr Nina Degrad, Cllr Stephen Mann, Cllr Pat Ryan, Members of Croydon Council Traffic Management Advisory Committee

Please reply to: 908 London Road, Thornton Heath CR7 7PE

Tel: 020 8665 1214

Email: steve.reed.mp@parliament.uk Website: www.stevereedmp.co.uk



Our Ref: ER14782

Dear Councillor Muhammad Ali

RE: Crystal Palace Low Traffic Neighbourhood

I write to you following a letter sent to Croydon Council on the 17th December 2020 enclosed, regarding the Low Traffic Neighbourhood in Crystal Palace. I am really disappointed not to have received a response to that letter, particularly given the urgency and the profound impact on my constituents.

The consultation outcome is now known and the results set out below:

- 26% in favour of changing the scheme to ANPR
- 15% in favour of retaining the existing scheme
- 61% in favour of removing the scheme entirely

An overwhelming number, 61% of residents, voted for the removal of the scheme entirely. However, I understand that Croydon Council is looking at implementing ANPR cameras instead. This is not what local residents voted for. This is not what local residents want. There was a high turnout of 25.29% of residents responding, it is important to note that traffic scheme consultation would usually expect a 10-15% response rate. I am surprised that the Council's report has implied a higher turnout was needed for the results of the consultation to be carried out as expressed by local people who have to live with the decisions they have voted for.

I wish for my views to be formally submitted to the council during tomorrow's meeting in relation to the LTN, where Cllr Angela Wilkins has been given 2mins to express the frustration that our residents continue to face as a result of the LTN zone.

I hope the council implements the outcome of the consultation democratically and fairly – I am clear that the scheme should be removed as the majority voted for this.

I look forward to receiving a response to both this letter and to my letter dated 17th December 2020.

Best wishes,

A handwritten signature in black ink that reads "Ellie Reeves".

Ellie Reeves
Member of Parliament for Lewisham West and Penge

CC:
Katherine Kerswell, Chief Executive
Traffic Management Advisory Committee members

Traffic Management Advisory Committee

Meeting held on Tuesday, 12 January 2021 at 6.30 pm. This meeting was held remotely.

MINUTES

Present: Councillor Muhammad Ali (Chair);
Councillors Luke Clancy, Karen Jewitt, Michael Neal, Pat Ryan and Paul Scott

Also Present: Councillor Stephen Mann

PART A

1/20 **Minutes of the Previous Meeting**

The minutes of the meeting held on 14 October 2020 were agreed as an accurate record.

2/20 **Disclosure of Interests**

There were none.

3/20 **Urgent Business (if any)**

There were no items of urgent business.

4/20 **Albert Road (Part) & Eldon Park - Results of Informal Consultation on a Possible Extension of the South Norwood Controlled Parking (CPZ)**

The Committee considered a report regarding the results of the informal consultation on the possible extension of the South Norwood CPZ into Albert Road (part) and Eldon Park.

The Parking Design Manager introduced and explained that there was a concern about the level of parking in in Albert Road, as problems were being caused by people parking on the foot way. It also bordered the South Norwood Controlled Parking Zone (CPZ), so parking was proving difficult in this area. Residents and Ward Councillors had been involved and consulted with before the informal consultation process begun in October 2020. The recommendations in the report were to begin the formal consultation period.

RESOLVED – That the Traffic Management Advisory Committee recommended to the Cabinet Member for Sustainable Croydon to:

1. Consider the responses received to the informal consultation on the proposed introduction of a Controlled Parking Zone (CPZ) in Albert Road (part) and Eldon Park Area.
2. Agree to proceed to the formal consultation stage for a proposal to extend the South Norwood CPZ into the section of Albert Road from the existing boundary by Coventry Road to its junction with Eldon Park, as illustrated on drawing number PD-405a.
3. If formal consultation is agreed, delegate to the Highway Improvement Manager, Public Realm Directorate the authority to give the notice.

5/20

Crystal Palace and South Norwood Low Traffic Neighbourhood

The Committee considered a report which outlined the evolution of the Temporary Low Traffic Neighbourhood (LTN) at Crystal Palace and South Norwood, implemented in stages in response to the ongoing Covid19 Pandemic.

Ian Plowright, Head of Transport, Planning and Strategic Transport, and Rachel Flowers, Director of Public Health, introduced the report and gave a presentation. This can be found on the following link:

<https://webcasting.croydon.gov.uk/meetings/11439>

Public Speakers

Eliska Finlay, representative of Open Our Roads, addressed the Committee and explained that the response rate from the consultation was high, and clearly showed that residents wanted the scheme to be removed entirely. She raised concern that despite fewer residents voted in favour of the scheme, the recommendations to the Cabinet Member of Sustainable Croydon were to continue. Local residents and the local primary school had explicitly asked the council to not install Automatic Number Plate Recognition (ANPR) camera technology; however, the consultation period and engagement with the residents had appeared to have broken down as residents were feeling powerless and their quality of life issues were being dismissed. She requested that the Cabinet Member did not extend the scheme, and instead, re-consulted with the four key boroughs, local schools, local businesses, and residents to design a scheme which was appropriate for the area. A specific transport and traffic management strategy was needed for the area, which included full data to measure the success or failings of a new scheme being introduced. Eliska Finlay concluded by stating that residents would welcome a scheme that improved the environment and reduced the reliance on cars, as long as it was suitable for the area.

Stuart Aitken addressed the Committee in his capacity as a local resident of Patterson Road, Bromley, and explained that the residents of Patterson Road and neighbouring streets had been effected with an additional large amount of traffic that Croydon Council had diverted through when the scheme was implemented. He noted that the residents had sent multiple emails, over 1000 people had signed a petition to remove the scheme, two videos had been sent of over 50 cars queuing to leave the area, and of two very serious incidents of road rage. He explained that these had felt ignored by Croydon Council. He concluded by reading a story, which had been sent to Croydon Council in September 2020, written by his neighbour who had lived on Patterson Road for 20 years:

"I got a call at 9am telling me my mother was dying. I jumped into my car in a state of panic. The normal 10 minute journey took me 40 minutes because of the heavy traffic Croydon Council had caused. As I walked into her room, she took her very last breath. I cannot tell you the pain and suffering you have caused me. I wasn't there to hold her hand and tell her how much I loved her. Because you decided to close off the roads of only a few privileged people impacting the majority of us, but also me, very, very personally. I now hate my job. I hate where I live. And I can honestly say that I've never felt so let down and full of despair as I do right now. You have been sent all of these stories, and yet you have ignored them. Muhammad in 2018, you were voted in with just 2820 votes. 2896 people voted to remove this scheme. More people voted to remove the scheme entirely than voted for you. It's time to listen."

Angus Hewlett, representative of Croydon Cycling Campaign, addressed the Committee and explained that they welcomed the scheme, but had a few concerns. He noted that the London Cycling Campaign (LCC) were of the few that any cycle routes where road space was shared with general traffic must carry fewer than 2000 vehicles per day with 85% compliance of a 20mph limit; this was so cyclists felt adequately safe on the road. The roads within the LTN carried over 5000 vehicles a day in each direction, with 85% illegally breaking the 20mph limit; this had reduced significantly since the introduction of the LTN, which consequently, had helped people feel more comfortable cycling on the road. He gave examples of families with children as young as six cycling together on the road and feeling safe to do so, nine year olds cycling to school independently, the bike racks at the local primary being fuller and older people rediscovering the joys of cycling short trips. Angus Hewlett explained that they hoped and expected that the ANPR scheme, even with exemptions and some non-compliance, would remain within the LCC and TfL zone safety threshold, and that the 18 month trial would enable many more local trips by bicycle. He expressed one concern regarding the bus gate; the closed segment of Auckland Road was currently carrying approximately 200 vehicles a day in each direction. The 200 vehicles a day was currently within the LCC and TfL thresholds; however, there were approximately 4000 homes in the area and an increase on the 200 could be detrimental. He concluded by stating that the Croydon Cycling Campaign welcomed the extension of the scheme, provided that there was a commitment to thorough open traffic counts and monitoring on all affected roads. Further support should also be

provided to residents by offering secure cycle storage, grants for ebikes, and continued engagement throughout the scheme.

Marcus Boyle, representative of Cypress Cycling Club, addressed the Committee and gave some background to the work the club does within the community, namely, teaching young children how to ride a bike and promoting safe spaces for cycling. He went on to explain that the Crystal Palace and South Norwood area was inaccessible for cyclists, due to the design of the area, unless you were a confident and experienced cyclist. Marcus Boyle went on to quote the following by Councillor Stuart King in 2018: *“Croydon is facing an obesity linked health crisis. Our children are growing up in an in a society where it has become normal to be overweight. In Croydon we rebuilt our street environment around the car which contributes to making us less active. However, the news is not all bad as out of all the London boroughs, Croydon has the greatest potential for cycling and walking.”* He concluded by noting that 25% of the residents in the LTN were children; he explained children were unlikely to respond to a consultation period, but there had been a significant increase in children cycling to school since the LTN was introduced, and these statistics should be included.

Agnieszka Harrison, representative of Shape Better Streets, addressed the Committee and explained that she was speaking on behalf of residents who were passionate about the long term vision of reducing vehicle traffic and promoting active travel. She stated that pollution was detrimental to physical and mental health and development, and people had been deterred from walking around this area, due to the danger, and were missing out on exercise. These concerns had been recognised as a problem by all political parties, and the issue had been magnified during the COVID-19 pandemic. Since the introduction of the LTN, there had been a significant increase of people walking and cycling rates had tripled since a traffic survey was completed in July 2020 – she noted that this was an increase in active travel on a wet day in November, compared to a warm summer day in July. There had also been an increase in schoolchildren walking, cycling or scooting to school. Her hope was that as more people pursued active travel, roads would become cleaner, quieter and safer, for all residents and the local schools within the LTN. She concluded by requesting that Croydon Council keep the LTN scheme in place, to improve the conditions for active travel, and to benefit the whole society by reducing the number of cars on the roads.

Amy Foster, representative of Croydon Living Streets, addressed the Committee and stated that there was ample evidence and research that indicated that investing in walking was good value for money: it supports healthy travel choices; generated new walking journeys; enabled older people to live healthier lives for longer, with increased independence and mental wellbeing; was effective at getting previously sedentary populations to build physical activity into their daily routine, which led to better health; reduced car ownership levels; improved air quality and reduced carbon dioxide emissions; reduced road danger to pedestrians and cyclists; and that healthy travel habits developed in childhood supported future healthy travel choices and better health in adulthood. She explained that all of these had long term

benefits, which required years, so was pleased that the recommendations were supportive of the trial continuing. Amy Foster went on to explained that an urban environment, which enabled and encourage physical activity through walking and cycling, was needed and would be a critical part of reducing the huge cost burden of physical inactivity and poor health on local and national care services. She concluded by requesting that an audit on pavement quality within the zone was conducted to understand where improvements were most needed, and for any revenue generated through non-compliance be used to improve the working environment for all.

Catherine Bradler addressed the Committee in her capacity as a local resident of Southern Avenue, Croydon. She explained that she had noticed a steady increase of traffic as a result of Satnavs rerouting main road traffic through residential roads; there were thousands of vehicles using the residential streets as shortcuts every day. She noted that Southern Avenue was effected particularly badly in terms of additional traffic, and that she had met with council representatives, and other local residents, to discuss solutions to reduce the volume of traffic. Before the LTN was introduced, Catherine Bradler explained that there was not a safe space to cross the road, which was particularly dangerous to children and vulnerable people, and that there had been multiple crashes, with parked vehicles being written off. She added that it was also not uncommon for traffic to be gridlocked, and she had witnessed drivers getting aggressive, to the point of physical altercations. She expressed to the Committee that the LTN had transformed the area, for herself, her family, and residents; her family used the car a lot less, and had begun car sharing, and her children aged twelve and nine now had the independence to move around the area unaccompanied by either walking, cycling or scooting. She concluded by noting that the LTN was not perfect, and some residents were not in support of it; however, the scheme only required a few amendments, which could be worked out during the trial period. She disagreed with the comments about traffic being displaced on to main roads, as the Satnavs had displaced traffic from main roads onto our residential streets, which were not designed to for a high volume of traffic.

Barclay Rae addressed the Committee in her capacity as a local resident of Lancaster Road, Croydon, and explained that he was speaking on behalf of five sets of neighbours in the local area. He noted that he had lived in the area since 2005 and had seen the traffic significantly increase during this time, causing severe safety issues, as the area had become a "rat run". Residents feared for their children's safety, as cars were constantly speeding and driving recklessly from the roundabout on Southern Avenue; speed bumps had been needed before the introduction of the LTN. He further added that the pick-up and drop-off times at Norwood Harris Academy increased the volume of vehicles in the area, which had come close to causing accidents. The introduction of the LTN had been a great improvement for the local residents in terms of environment and safety; he explained him and his family had been doing more fitness, in particular running and walking in the area. He concluded by noting that in addition to the safety of the neighbourhood, traffic pollution needed to be reduced to protect the environment. The damage to the

environment was at a critical point, and these schemes needed to be debated and considered.

Councillor Angela Wilkins, Bromley Councillor for Crystal Palace Ward, addressed the Committee and noted that she was representing her residents, and had been lobbied by both sides in regards to the LTN. She explained that nobody had disagreed that there were too many cars in the area, and that something needed to be done to improve the current situation; however, the delivery in this scheme was not conducted correctly. She noted that this included: the introduction of the scheme whilst the scaffolding and temporary traffic controls were still in place on Church Road; angering residents by not listening to the general consensus from the consultation; the impact the scheme had had on Belvedere Road, Cintra Park, Patterson Road and Milestone Road, whilst these residents had not received any of the benefits from the scheme. She concluded by explaining that the residents on the border of the two councils, in the Fox Hill area, were suffering, as both councils had different views on the benefits of LTNs

Councillor Stephen Mann, Croydon Councillor for Crystal Palace and Upper Norwood Ward, addressed the Committee and explained that he and Councillor Pat Ryan were in favour of trialling a bus gate, but he had reservations about the planters. However, since the removal of the scaffolding on Church Road, he had now concluded that an ANPR trial was the correct solution for the area. He explained that there were longstanding issues in the Crystal Palace area, due to the design of the streets, with regular gridlocked traffic and large tailbacks of cars. He noted that there were conflicting views from the residents on the LTN, reflected in the speakers at the Traffic Management Advisory Committee, but he believed that the ANPR was a solution that would benefit many residents, with the removal of the planters. Concerns had been raised by some of the businesses situated within the “triangle”, but 14 new businesses had opened in recent months, so there was not a decline in local businesses in the area. He recognised that many residents lived on main roads and more work needed to be done to understand the levels of pollution and traffic on these roads, and to mitigate these. He concluded, by requesting that the Committee and Cabinet Member for Sustainable Croydon considered the following points:

- For proper air quality monitoring along main road network and the “triangle” was undertaken, and appropriate resolution was looked at for the entire area.
- To look at the levels of toxic air on the main roads, caused by the high level of traffic.
- To ensure safe routes on the edge of the LTN, and to consult further with the London Borough of Bromley regarding this.
- That engagement takes place with car club providers to ensure adequate provision with the LTN, and for these cars to be treated the same as private vehicle owned within the zone.
- For the council to engage proactively and continuously with residents and businesses through the Crystal Palace area forum.

- That detailed activity was taken within the “triangle” businesses, including customer travel surveys and analysis of travel and traffic levels.
- That further work was done to explore genuine exemptions, including delivery services, and zero emission vehicles.

In response to the representations received, the Head of Transport, Planning and Strategic Transport noted that concern had been raised regarding the expectations following the consultation; he clarified that the results of the consultation were always to be brought back to the Traffic Management Advisory Committee, in addition to all other considerations. He noted that this was stated in both the street notices and in the letters that were delivered to residential properties and businesses and their properties in the area and the surrounding roads.

Questions from the Committee to Officers

Councillor Karen Jewitt raised concerns regarding the doctor’s surgeries, and noted that there should be provisions in place to allow drop-offs for appointments, and also for carers working in the area. In response to these queries, it was explained that Croydon Council had been in discussions with the NHS regarding the support of care staff, to ensure the service was not impacted on; care staff who worked for the NHS would receive permits, and those who needed to visit patients regularly would have resident passes. In regards to private caring agencies, the resident would need to apply for a permit on their behalf, which would be a virtual pass. Croydon Council had also met with the doctor’s surgery to discuss the impact of the LTN and the bus gate, and in response to these conversations, access would be provided to both sides of the surgery; the bus gate would be moved to begin by the north side of the surgery, and two disabled bays would be at the south side of the surgery.

In response to Councillor Pat Ryan, it was confirmed that exemptions would be given, but these would need to be limited as concerns had been raised about how many people would be using the route, and the impact this would have on cyclists. Councillor Pat Ryan requested that professions such as the teachers and head teachers from the local schools and effected NHS staff were considered.

In response to Councillor Michael Neal’s query regarding statistics on air quality, the Head of Transport, Planning and Strategic Transport explained that due to the scheme being implemented during the pandemic, there was not the opportunity to collect a high level of air quality data. When air quality data was last collected in Croydon in 2016, nitrogen dioxide was the only pollutant above the national required limit value. The Director of Public Health added that these scheme would significantly cut down the pollution, and the reduction in car use and feeling safer would encourage residents to be more active; this would improve the emotional, mental and physical wellbeing of residents, as well as the air quality in the area.

In response to Councillor Neal it was confirmed that approximately 65% of responses came from outside of the LTN zone, and 35% in the LTN zone. Croydon Council had delivered over 6000 letters to the LTN zone, and from these 1523 had responded. It was also explained that only one response which was identifiable from Cypress Primary School was very negative and from a member of staff; if it was agreed by the Cabinet Member for the scheme to be trialled, then active engagement would be sought with the school.

Debate

Councillor Karen Jewitt noted that the timing for introducing the scheme was wrong, particularly in regards to the scaffolding being put up on Church Road, and the work taking place; Croydon Council should accept this and apologise, as it had upset a lot of residents. She also stated that the questionnaire and engagement had with residents could have been improved. The length of the trial could be up to 18 months, but she requested that the Cabinet Member for Sustainable Croydon considered trialling the scheme for just six months, as too many residents were not happy with the scheme. She also requested that officers consider doing a door-to-door consultation, if permitted during the COVID-19 pandemic; alternatively, a second leaflet drop to all residents in the area to ask how the LTN had impacted on their lives.

Councillor Luke Clancy stated that few residents who lived within the LTN had benefitted, due to essentially living within a gated community; however, he noted that the scheme diverted traffic through surrounding areas, negatively impacting on particular communities in the borough. Councillor Karen Jewitt expressed concern at the statement as she felt that it was untrue and unfair to state that particular communities were being negatively impacted. She explained that she lived in the area, and it was a mixed community where its diversity was celebrated. Councillor Luke Clancy responded by explaining he was not implying that it was the intention of the scheme, but an unintended consequence.

Councillor Luke Clancy explained he was in favour of reducing reliance on cars and reducing emissions and pollution, and to also encourage walking, cycling and using public transport. However, he noted a large number of objections had been received from the London Borough of Bromley, the MPs, and local head teachers. One Headteacher had explained to the council that teaching staff were seeking work elsewhere due to their extended commute caused by the LTN, which would have an impact on the quality of education being provided. He requested that the Cabinet Member completely withdraw the scheme, as it was not suitable for the area.

Councillor Paul Scott noted that the timing of the scheme was unfortunate, as it coincided with traffic controls and the scaffolding being erected. Residents had also been unable to experience "normal" traffic rates to see the full effect of the scheme, due to the pandemic and lockdowns. He was of the understanding the scheme would make a positive difference, and that the revised scheme should be trialled; he proposed the scheme should be 12

months, as 18 months was too long but six months would be too short to see the full impact. This scheme would positively impact the environment, and he noted to the Committee the current climate change emergency and the danger this was having, and how the council would need to make some difficult decisions to change the way of living. The Government and Mayor of London were promoting streets being regained for communities, and he explained he wanted more LTNs to be introduced across the borough. He concluded by highlighting the strong opinions heard at Committee by residents, local groups, and cycling groups making a case for why safer neighbourhoods were required, and for improving the air quality where they lived. He urged the Cabinet Member to consider a 12 month scheme, which should be fully consulted on after the pandemic.

Councillor Michael Neal thanked all the representations received from the public. He explained that the benefits on the long-term health and for school children had been noted; however, he had concerns that there was a lack of long-term air quality data. He also noted the strong objections that had been received, namely from the London Borough of Bromley and the local MPs, who did not agree with implementation of the scheme. He requested that the scheme was not agreed, and that the Cabinet Member for Sustainable Croydon look at alternative schemes for the area.

The Chair of the Traffic Management Advisory Committee thanked everyone for their contributions, and explained that it was an Advisory Committee, and he would be asking Members of the Committee individually if they endorsed the recommendations outlined in the report. He would then make a decision following Committee with, the evidence gathered, the Committee report and appendices, the minutes of the meeting, and the webcast. This decision would be published on the website, and be subject to call-in.

Recommendations

Councillors Luke Clancy, Michael Neal and Pat Ryan stated that they did not endorse the recommendations made to the Cabinet Member for Sustainable Croydon.

Councillors Karen Jewitt and Paul Scott endorsed the recommendations made to the Cabinet Member for Sustainable Croydon; however, they both requested the length of the trial was reconsidered, to either six or twelve months.

Recommendations outlined in the report:

That the Traffic Management Advisory Committee recommend to the Cabinet Member for Sustainable Croydon that they:

- 1.1 Consider:
 - a) the responses received to the informal consultation on the options for the future of the Crystal Place and South Norwood Temporary Low Traffic Neighbourhood and other feedback.

- b) the Mayor of London's Transport Strategy and the Council's plan to implement it within the Borough (the Croydon Local Implementation Plan).
 - c) the Council's statutory duties, including its duties under the Road Traffic Regulation Act 1984, in particular its duties under s.9, s.121B and s.122, its duties under the Traffic Management Act 2004, in particular its duty under s.16, its duties under the Equality Act 2010, in particular under s.1 and s.149 (the public sector equality duty). .
 - d) the statutory guidance 'Traffic Management Act 2004: network management in response to COVID-19' as updated on 13 November 2020.
 - e) the other matters within and referred to within this report.
- 1.2 Agree to the removal of the measures implementing the Temporary Low Traffic Neighbourhood as soon as practicable and in any event prior to the implementation of the recommended Experimental TRO.
- 1.3 Agree (subject to Spending Control Panel agreeing to the spending of ring fenced grant funding) to implement an Experimental Low Traffic Neighbourhood at Crystal Palace and South Norwood 'Experimental LTN' by the making of an Experimental Traffic Regulation Order (Experimental TRO) to operate for up to 18 months, to:
- 1.3.1 prohibit access and egress by motor vehicles (other than certain exempt vehicles) at the following locations:
 - (a) Sylvan Hill at the common boundary of Nos.11 and 13
 - (b) Lancaster Road junction with Goat House Bridge
 - (c) Fox Hill junction with Braybrooke Gardens
 - (d) Stambourne Way junction with Auckland Road
 - (e) Bus gate introduced at the common boundary of Nos. 86 and 84a(Auckland Road Surgery) Auckland Road

These restrictions to be enforced through Automatic Number Plate Recognition (ANPR) camera technology, shall not apply in respect of:

 - (a) a vehicle being used for fire brigade, ambulance or police purposes;
 - (b) anything done with the permission of a police constable in uniform or a civil enforcement officer;
 - (c) a vehicle being used for the purposes of a statutory undertaker in an emergency, such as the loss of supplies of gas, electricity or water to premises in the area, which necessitates the bringing of vehicles into a section of road to which the order applies;
 - (d) vehicles to which a valid exemption permit has been provided;
 - (e) licensed taxis at the bus gate only.
 - 1.3.2 Introduce two disabled persons Blue Badge parking bays outside Nos. 84 and 86 Auckland Road.

for the reasons set out in this report and summarised at paragraph 3.12 and 15.3 of the report.

- 1.4. Delegate to the Director of Public Realm the authority to vary the provisions of the Experimental TRO including the exemptions to the restrictions.
- 1.5 Instruct officers to continue to seek to work with those in Bromley Council to mitigate effects predicted to arise from the Experimental LTN in certain residential access streets in Bromley.
- 1.6 In relation to Equality to agree:
 - i) that the equality implications of the recommended Experimental Traffic Regulation Order have been the subject of careful consideration in compliance with the Council's obligations under sections 1 and 149 of the Equality Act 2010;
 - ii) nevertheless there should be further equality impact analysis including through focused engagement with the members of groups with protected characteristics potentially most affected by the proposed change in and around the area of the current LTN during the operation and improvement of the Experimental TRO
- 1.7 That a recommendation on the future for the Experimental LTN be brought to the Traffic Management Advisory Committee at the appropriate time.

6/20

Exclusion of the Press and Public

This was not required.

The meeting ended at 8.32 pm

Signed:

Date:

.....
.....

REPORT TO:	TRAFFIC MANAGEMENT ADVISORY COMMITTEE 15 February 2021
SUBJECT:	The Crystal Palace and South Norwood Low Traffic Neighbourhood: Addendum Report
LEAD OFFICER:	Shifa Mustafa, Executive Director, Place Steve Iles, Director, Public Realm
CABINET MEMBER:	Councillor Muhammad Ali, Cabinet Member for Sustainable Croydon
WARDS:	South Norwood, Crystal Palace and Upper Norwood

SUMMARY OF REPORT:

On 27th January 2021, the Cabinet Member for Sustainable Croydon took the following decision (as summarised):

In relation to the existing Crystal Palace and South Norwood Temporary Low Traffic Neighbourhood, to remove the measures implementing the existing Temporary Low Traffic Neighbourhood as soon as practicable;

In relation to the proposed Crystal Palace and South Norwood Experimental Low Traffic Neighbourhood:

- *In relation to the report to the Traffic Management Advisory Committee held on 12 January 2021 (“the January 2021 Report”) – To request officers to prepare an addendum to the January 2021 Report addressing the judgment of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] EWHC 72 and the impact, if any, on the recommendations in respect of the proposed experimental order which were made to the Traffic Management Advisory Committee in the January 2021 Report; and*

Refer the addendum back to the Traffic Management Advisory Committee for consideration, with a decision to be taken by the Cabinet Member thereafter.

This report comprises the addendum to the January 2021 Report requested by the Cabinet Member. It advises on the continuing soundness of the recommendations made to TMAC in the January 2021 Report in the light of the judgment in *R (UTAG & LTDA) v Mayor of London and TfL [2021]*.

It includes the question asked of TMAC by the Cabinet Member when taking the decision:

Following the preparation of the addendum to the January 2021 report, does the Traffic Management Advisory Committee endorse the recommendations 1.1 and 1.3 – 1.7 of the January 2021 report, or such other recommendation in the addendum, in respect of the proposed experimental order?

In particular, this addendum considers:

- The Equality Analysis produced in the January 2021 Report and the subsequent revision to it, bearing in mind the judgment and the publication of the ‘Pave the Way’

report by Transport for All into the experiences of disabled people arising from LTNs recently implemented in London.

- The access of taxis and buses to the South Norwood and Crystal Palace LTN, bearing in mind the importance of such public transport for people with disability and schools within the area.

This Addendum recommends increasing the categories of vehicle to which Automatic Number Plate Recognition (ANPR) camera technology (Recommendation 1.3.1 in the January 2021 Report), shall not apply, to include, taxis and buses, including Dial-a-Ride vehicles. It also states that the eligibility for permits providing exemption to the recommended Experimental LTN restrictions in the January 2021 Report, should be extended from vehicles belonging to residents within the area of the LTN to:

- Vehicles of staff employed at Cypress School and Harris Academy Crystal Palace;
- Vehicles used by care givers of sick and/or disabled residents within the area of the LTN;
- Vehicles registered by Blue Badge holders;

In addition, the opportunity has been taken to consider a GLA and TfL commissioned study into the air quality improvement effects of implementing the Mayor's air quality related policies, published on 22 January 2021.

POLICY CONTEXT:

See the January 2021 Report.

FINANCIAL IMPACT:

A revision of the Equality Analysis has resulted in an addition to the scope of the proposed Experimental LTN, estimated to result in a project cost increase of £25,000. Meeting this additional cost is to be included within the Council's ask to Transport for London, when seeking release of LIP Funding for 2021/22.

KEY DECISION REFERENCE NO.: 6520SC

RECOMMENDATIONS:

The recommendations made to the Traffic Management Advisory Committee in the January 2021 Report are maintained subject to the following changes:

1. Having considered the revised Equality Analysis, the Traffic Management Advisory Committee recommend to the Cabinet Member for Sustainable Croydon that:
 - 1.1 The categories of vehicle to which Automatic Number Plate Recognition (ANPR) camera technology (Recommendation 1.3.1 in the January 2021 Report), shall not apply is extended to include:
 - (a) a vehicle being used for fire brigade, ambulance or police purposes;
 - (b) anything done with the permission of a police constable in uniform or a civil enforcement officer;
 - (c) a vehicle being used for the purposes of a statutory undertaker in an emergency, such as the loss of supplies of gas, electricity or

water to premises in the area, which necessitates the bringing of vehicles into a section of road to which the order applies;

- (d) buses;
- (e) licensed taxis
- (f) Dial-a-Ride vehicles;
- (g) vehicles to which a valid exemption permit has been provided.

for the reasons set out in this report and summarised at paragraph 3.12 and 15.3 of the January 2021 Report.

1.2 The Cabinet Member consider the revised Equality Analysis when making their decision in relation to recommendations 1.1 and 1.3 -1.7 in the January 2021 Report.

1. INFORMATION WITHIN AND EFFECT OF THE ADDENDUM REPORT

Reasons for the Addendum

1.1 At its meeting of 12th January 2021, the Traffic Management Advisory Committee (TMAC) considered the report 'The Crystal Palace and South Norwood Low Traffic Neighbourhood' ('the January 2021 Report'¹) and the recommendations within it. Between the meeting of TMAC and the Cabinet Member for Sustainable Croydon taking the Key Decision, a High Court Judgement was issued in respect of:

- Transport for London's and the Mayor of London's 'Streetspace Plan for London';
- the associated 'Interim Guidance to Boroughs'; and
- the 'A10 GLA Roads (Norton Folgate, Bishopsgate and Gracechurch Street, City of London (Temporary Banned Turns and Prohibition of Traffic and Stopping) Order 2020' made by Transport for London (TfL).

In relation to the recommendations in the Report, and following the High Court Judgement, the Cabinet Member took the decision²:

'Having carefully read and considered the Part A report, in the signed decision notice attached and the requirements of the Council's public sector equality duty in relation to the issues detailed in the body of the reports, the Cabinet Member for Sustainable Croydon

¹ <https://democracy.croydon.gov.uk/mgAi.aspx?ID=10368#mgDocuments>

² <https://democracy.croydon.gov.uk/ieDecisionDetails.aspx?ID=598>

Resolved:

1.1 To consider:

- a) the responses received to the informal consultation on the options for the future of the Crystal Place and South Norwood Temporary Low Traffic Neighbourhood and other feedback.*
- b) the Mayor of London's Transport Strategy and the Council's plan to implement it within the Borough (the Croydon Local Implementation Plan).*
- c) the Council's statutory duties, including its duties under the Road Traffic Regulation Act 1984, in particular its duties under s.9, s.121B and s.122, its duties under the Traffic Management Act 2004, in particular its duty under s.16, its duties under the Equality Act 2010, in particular under s.1 and s.149 (the public sector equality duty).*
- d) the statutory guidance 'Traffic Management Act 2004: network management in response to COVID-19' as updated on 13 November 2020.*
- e) the other matters within and referred to within this report.*

1.2 To agree to the removal of the measures implementing the Temporary Low Traffic Neighbourhood as soon as practicable and in any event prior to the implementation of the recommended Experimental TRO.

1.3 To request the following additional information to enable consideration of the recommendations 1.1 and 1.3 – 1.7 of the January 2021 report

- a) An addendum to the January 2021 report addressing the judgement of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] and the impact, if any, on the recommendations in respect of the proposed experimental order which were made to the Traffic Management Advisory Committee in the January 2021 report.*

1.4 To request the following question be put to the Traffic Management Advisory Committee/officers/persons who made representations to the Committee/in response to the consultation to facilitate further consideration of the recommendations in paragraph 1.1 and 1.3 – 1.7 of the January 2021 report

- a) Following the preparation of the addendum to the January 2021 report, does the Traffic Management Advisory Committee endorse the recommendations 1.1 and 1.3 – 1.7 of the January 2021 report, or such other recommendation in the addendum, in respect of the proposed experimental order.*

1.5 To request the additional information and questions be put to the Traffic Management Advisory Committee/officers/persons who made representations to the Committee/in response to the consultation to enable further consideration of the recommendations at 1.1 and 1.3 – 1.7 of the January 2021 report.

a) Response from local school and how we will work with them to resolve their concerns

The two local schools have both expressed concern with regards access to their establishments by teachers and other staff. The team are to investigate how these concerns can be addressed to best effect for all concerned

b) Access for care workers

The needs of our residents who require home care, be that via professionals or family members, must be considered so that they and their care givers are not disadvantaged by this scheme. Clarity needs to be given as to how the Council will deal with the essential needs of those affected.

c) Access for car clubs

Car clubs do mean that there are less cars on our roads at any one time as households can rely on the use of such clubs almost entirely. Residents living within the zone that do not have access to their own car or rely from time to time on the use of car club alternatives should not be penalised for trying to reduce their reliance upon the ownership of a car or similar. The team is to investigate how car clubs can be incorporated into the operation of the zone in a similar way to Care Givers.

d) Period of experimental order

It is acknowledged that the Committee did not want the Experimental TRO to last beyond 12 months, with a review at that stage.

e) Engagement with the London Borough of Bromley

Officers to report to TMAC on a regular basis to allow for the updating of the committee as we work together with Bromley to progress the scheme.

Notwithstanding the above, since the meeting of TMAC I have been made aware of the judgment of Mrs Justice Lang in the case of (R (UTAG & LTDA) v Mayor of London and TfL [2021] EWHC 72 which has quashed the London Streetspace Plan and Transport for London's "Interim Guidance to Boroughs". Whilst I understand that the quashing order is stayed pending appeal by TfL, I consider it necessary to fully understand the impact of the judgment, if any, on the recommendations to the Traffic Management Advisory

Committee, to take a decision in relation to the proposed Experimental Orders which will comprise the Low Traffic Neighbourhood.'

as detailed in the Public Notice of Key Decision No: 6520SC, 27th January 2021 taken by the Cabinet Member for Sustainable Croydon and published by the Council Solicitor and Monitoring Officer on 27th January 2021.

- 1.2 This addendum report addresses the judgment of Mrs Justice Lang, and matters raised at the TMAC meeting on 12th January 2021, namely:
- Responses from local schools and how we will work with them to resolve their concerns
 - Access for care workers
 - Access for car clubs
 - Length of the experiment period before review
 - Working with Bromley Council
- 1.3 Since the meeting of TMAC on 12th January, Transport for All published its report 'Pave the Way' on LTNs (implemented in London following the start of the Covid19 Pandemic) reporting the experience and views of 84 people with disabilities recruited into the study. The publication of 'Pave the Way' has informed further development of the Equality Analysis relating to the proposed Experimental LTN, which in turn has informed amended recommendations.

The High Court Judgement

- 1.4 On 20 January 2021 the High Court handed down judgment in R (UTAG & LTDA) v Transport for London & Mayor of London [2021] EWHC 72(Admin)³, which involved the consideration of two consolidated claims for judicial review ("the Judgment"). The claims for Judicial Review were brought by representatives of the 'Black Cab' industry to challenge:
- 1) The Mayor of London's Streetspace Plan;
 - 2) The Streetspace Interim Guidance produced for London Boroughs; and
 - 3) A Traffic Management Order made under Section 14 RTRA 1984 restricting the use of the A10 at Bishopsgate to Buses and cycles only ("the A10 Order") against TfL was brought by the United Trade Action Group Limited and the Licensed Taxi Drivers Association Limited representing taxis/black cab drivers. There were five grounds for judicial review, four of which were upheld, the Judge ruling:
- 1.5 The Judge considered five grounds of challenge, of which the following succeeded:
- Ground 1:** in making the Streetspace Plan and Interim Guidance, the Mayor and TfL failed to distinguish taxis from "general traffic" failing to have regard to relevant material considerations, namely:

³ <https://www.bailii.org/ew/cases/EWHC/Admin/2021/72.html>

- the distinct status of taxis as a form of public transport, reflected both in law and policy;
- the role played by taxis in facilitating accessible public transport for those with mobility impairments.

This ground succeeded in relation to the Streetspace Plan and Interim Guidance, and the judge made particular note that (a) taxis were not mentioned in either the Streetspace Plan or Interim Guidance; (b) the importance of taxis for the purposes of access for people with disability and (c) that the Streetspace Plan and Interim Guidance were made without regard to the Bus Lane Policy and Policy Guidance. It is noted however, Ground 1 did not succeed in respect of the A10 Temporary Order.

Ground 2: In making the Streetspace Plan and Interim Guidance and the A10 Order, TfL and the Mayor failed to have proper regard to the public sector equality duty, pursuant to section 149 of the Equalities Act 2010.

This Ground also succeeded. For the purposes of the Streetspace Plan and the Interim Guidance, the judge considered that the Duty applied and that there was no evidence that the Defendant did in fact comply, having not undertaken an Equality Impact Assessment. In relation to the A10 Order, it was considered that the Equality Impact Assessment that was undertaken “did not meet the required standard of a “rigorous” and “conscientious” assessment, conducted with an open mind”.

Ground 4: The Streetspace Plan and Guidance and the A10 Temporary Order breached the Claimants’ legitimate expectation to pass and repass on London’s roads, and to use lanes reserved for buses. The Claimant succeeded in asserting that taxis have a legitimate expectation to use bus lanes.

Ground 5: The treatment of taxis in the Streetspace Plan and Interim Guidance and the A10 Order was irrational.

The judge considered that the flaws in decision making were sufficient to deem the Streetspace Plan, Interim Guidance and A10 Order as irrational. Issues were pointed out in respect of a lack of consultation, lack of evidence base and failure to consider alternative options.

As a result, the Judge quashed the Streetspace Plan, the Interim Guidance and the A10 Order however the quashing order was stayed pending appeal by TfL. Should the appeal be unsuccessful, TfL may apply for further time (if required) to finalise a revised Streetspace Plan, Interim Guidance and Temporary Order before the quashing orders take effect. As such the Streetspace Plan for London and the Interim Guidance to Boroughs still stand pending the outcome of the appeal process. It is understood from TfL that they intend to lodge an appeal, and have until 10th February to do so. A verbal update will be provided to TMAC on 15th February.

The recommendations in the January 2021 Report included an exemption to the Auckland Road bus gate restrictions for licensed taxis, recognising the status of taxis as a form of public transport.

1.6 Recommendation 1.1 in the January 2021 Report was to consider a number of specific matters. The Streetspace Plan and Interim Guidance were not amongst the matters specified. However, the final part of recommendation 1.1 was to consider the other matters within and referred to within the Report. Section 3 of the Report set out the background to the recommended Experimental LTN:

- beginning with the Local Implementation Plan (LIP) proposal to pursue a Healthy Schools Neighbourhood at Upper Norwood and the early work initiated just prior to the Covid19 Pandemic
- reporting the Secretary of State for Transport's call to local authorities in May to take swift action to create space for social distancing, walking and cycling
- reporting TfL's announcement that there would be no funding (at least for the first half of 2020/21) to support delivery of LIPs, instead this was being replaced by funding to deliver the Streetspace Plan for London
- explaining that in order to produce a more strategic response to the Streetspace Plan for London within Croydon, officers had employed research including TfL's 'Temporary Strategic Cycling Analysis' and 'Strategic Neighbourhood Analysis' (both of which are appendices to the Interim Guidance).

1.7. Para 3.15 of the report summarises the reasons for the recommendation:

- beginning with the continuing Covid19 Pandemic and the Secretary of State reiterating his call to local authorities to take action; and
- explaining that LTNs are a key means of implementing the Mayor of London's Streetspace Plan and his Transport Strategy, (in particular the Healthy Streets approach and objective within the Strategy), before outlining the further reasons for the recommendation.

1.8 The reasons for the recommendations / proposed decision are set out at Section 15 of the January 2021 Report. Again these include:

- the continuing Covid19 Pandemic (and the Secretary of State's call to local authorities to take action); and
- the recommended LTN being (when combined with others) a major means of delivering objectives in the Mayor of London's Transport Strategy including the Healthy Streets objective and the 'Top Priority' cycle corridor identified by TfL from Crystal Palace to the Town Centre. Whilst the priority cycle corridors were identified in TfL's 'Analysis for Temporary Strategic Cycle Network', which is an appendix to the Interim Guidance, TfL's methodology and conclusions are considered sound, reflecting findings in TfL's 2017 'Strategic Cycling Analysis: Identifying future cycling demand in London'.

1.9 As stated in 1.1 above, the quashing of the Streetspace Plan and Interim Guidance was stayed by the Judge. Consequently (for the time being) the Streetspace Plan and Interim Guidance remain important matters when considering the recommendations within the January 2021 Report. That said,

were there hypothetically to be no Streetspace Plan for London, the remaining matters of importance set out in the January 2021 Report, are so wide and strong that it is considered that the recommendations in the Report would still stand and are justified.

Transport for All's 'Pave the Way' Report

- 1.10 As suggested by the terms 'Experimental LTN' and 'Experimental Traffic Order', the intention was that this be an experiment that could be trialled, refined and adjusted. The recommendations in the January 2021 Report include the ability to vary the provisions of the Experimental Traffic Order including the exemptions to the restrictions. The intention was to look to lessen the restrictions / widen the exemptions prior to the start of the experiment and /or as part of the experiment, whilst being compatible with the objectives of the Experimental LTN. The Equality Analysis included the recommendation (referenced at para 6.9 of the January 2021 Report) that there should be a dialogue with Dial-A-Ride, Community Transport and SEN Transport operators and users, to help refine the operation of the trial scheme.
- 1.11 Since the 12th of January, Transport for All published a report 'Pave the Way' into the experiences of disabled people arising from LTNs recently implemented in London. The opportunity has been taken to revise the Equality Analysis relating to the recommended Experimental LTN. This has resulted in a slight amendment of the recommendations, namely to exempt buses and taxis from the camera enforced 'No Motor Vehicle' restrictions and signs from the outset of the Experimental LTN. This to provide for free movement of Dial-A-Ride vehicles, taxis, buses used by the SEN Transport Service and Community Transport Minibuses.

Response from Local School and How We Will Work With Them to Resolve Their Concerns

- 1.12 A response was received from the joint Executive Headteacher Pegasus Academy Trust (Trust includes Cypress School) via the online residents' survey questionnaire regarding the future for the Temporary LTN. The comment boxes summarised concerns (later expressed in a witness statement⁴ and an email following TMAC). The address given was a residential address, and the significance of the questionnaire entry /comments was not fully picked up (and separately addressed) from amongst the 5,293 entries received, and 4,315 responses analysed. Six further questionnaire responses mentioned either 'Pegasus' or 'Cypress'. These gave personal experiences and views, again giving residential addresses. Following the meeting of TMAC the Joint Executive Head Teacher emailed TMAC members and others, setting out her concerns including:
- There are a number of schools within the trust (Cypress Primary School, Whitehorse Manor Infant School, Whitehorse Manor Junior School, Ecclesbourne Primary School and Beulah Infant School) and The personal and professional lives of a significant number of staff working

⁴ Statement dated 9/1/20 but presumed to be 09/01/2021 (as it references an event on 08/12/2020) emailed to officers, the Leader of the Council and the Cabinet Member for Sustainable Croydon by 'Open our Roads' following the meeting of TMAC on 12th January (see Background Documents).

within The Pegasus Academy Trust have been greatly impacted by the closure of roads which are crucial for our work with over 2000 pupils in South Norwood and Thornton Heath.

- Some staff are now seeking work elsewhere as they cannot manage the extended journey to and from work and when needing to travel between schools which they often need to do.
- The impact on staff wellbeing is enormous. The added journey times as well as the difficulties faced travelling between schools is causing stress and impacting on the quality of education
- ANPR will not improve the situation, the main problem is inaccessibility to roads and large queues of stationary traffic.

The council's Head of Transport spoke with the Joint Executive Headteacher as this report was being finalised. The Joint Executive Headteacher has provided wording at appendix 1, which represents her personal views and those of the staff affected.

1.13 Officers are not aware of correspondence from the Harris City Academy Crystal Palace being received directly. An email was sent by Ms Eliska Finlay on the 14th of January to TMAC members and others, attaching a screenshot of messaging with/from the Head of the Academy on the 14th (appendix 2). The points made by the Head include:

- Increased travel time due to the LTN restrictions and the bottleneck it has caused at Crystal Palace
- ANPR with exemption/access for staff would lessen concerns and stress but many would not want to apply for a pass to work to educate the nation's next generation.

1.14 Following the meeting of TMAC, an official complaint was received from a person with connections to a number of schools (none directly within the area of the Temporary LTN) expressing concerns including:

- Process, both in terms of management of the consultation and at the meeting of TMAC re' failure to engage with schools effectively and report the views of schools
- Harris South Norwood and All Saints Primary Schools are located on the boundary roads of the LTN with both schools' playgrounds located on distributor roads receiving displaced traffic from the LTN.
- Schools have a duty to provide school meals, required to include fresh food. Catering services need regular and timely deliveries of fresh produce. What steps have council officers taken to ensure that these essential food deliveries are not adversely affected by the road closures?

1.15 Prior to the start of the recommended Experimental LTN, the list of vehicles (provided by Cypress School) to have exemption from the Cypress Road School Pedestrian Zone restrictions, will be used to provide a wider exemption from the Crystal Palace and South Norwood Experimental LTN restrictions, for vehicles used by staff to access Cypress School. A request will be made to Harris Academy Crystal Palace for a list of staff vehicles to have exemption from the Experimental LTN restrictions.

- 1.16 The communications and engagement plan for the period prior to the operation of the Experimental LTN and during it, has yet to be finalised. Schools will be an important element within that plan. It is hoped that a positive relationship can be re-established with Cypress School and established with Harris Academy Crystal Palace. The hope is to draw in, consider and respond to the views of school staff, and children and young people attending the schools.
- 1.17 Having considered the views regarding schools, it is not considered necessary to further amend the recommendations. However, it is important that officers engage with schools in the area of the recommended Experimental LTN, and where proposing or reviewing other LTNs. This with a view to ensuring, as far as possible (whilst still achieving the Healthy Streets and Low Traffic Neighbourhood objectives) ease of access for school staff to schools, and operational access between schools.

Access for Care Workers

- 1.18 The needs of residents who require home care, given by professionals or family members, have to be considered so that they and their care givers are not disadvantaged by the recommended Experimental LTN scheme. Residents within the area of the LTN will be able nominate carers' vehicles to be provided with an exemption permit relating to the experimental LTN restrictions.

Access for Car Clubs

- 1.19 Under the historic model of car club operation (whereby car club vehicles are driven from, and returned to, designated parking bays) providing exemption permits for car club vehicles 'based' within an LTN, would hopefully be straightforward. However, car clubs have moved to a model of 'floating' vehicles. Car club vehicles can be left wherever they can be legally parked, and car club users locate the parked vehicles using mobile apps. Officers will work with car club operators to devise a solution. Ideally, this will be a London-wide solution as the issue will be common to LTNs across the Capital.

Period of Experiment

- 1.20 An Experimental Traffic Order can last for up to 18 months. However, if implemented, the Experimental LTN will be reviewed after 12 months and recommendation as to its future brought to TMAC. It is also intended to incorporate any adjustments to the Experimental LTN, (arising as a consequence of issues identified by the public and reported, or via professional assessment) within the first six months of operation. If any adjustment is deemed essential beyond that time, then the adjustment is to be discussed at TMAC.

Engagement with the London Borough of Bromley

- 1.21 Officers will report to TMAC on a regular basis, updating the Committee on the work with Bromley and other neighbouring Highway and Traffic Authorities (including TfL) to progress the Experimental LTN.

Blue Badge Parking Permit Holders

- 1.22 Following the revision of the Equality Analysis, it is proposed to widen the exemption eligibility to holders of Blue Badge parking permits, enabling holders to register up to two vehicles (akin to the Congestion Charge scheme). This is to provide ready and direct vehicle access to premises within the Experimental LTN, including the Auckland Surgery, for blue Badge holders living beyond the LTN.

2. CONSULTATION

- 2.1 See the January 2021 Report.
- 2.2 Letters were received from Steve Reed MP, Ellie Reeves MP and Bromley Council just prior to the 12th January meeting of TMAC. Verbal outline summaries were given to TMAC by the Head of Transport at the end of his introduction presentation to the meeting. Having considered the letters prior to the meeting, and balancing the content with the matters within the Report, the recommendation to implement an Experimental LTN was left unchanged. The letters were passed to the Cabinet Member for Sustainable Croydon for his consideration. Officers are considering the suggestion of a 'citizen's assembly' perhaps using the 'infrastructure' of the Croydon Climate Crisis Commission.

3. REASONS FOR RECOMMENDATIONS / PROPOSED DECISION

- 3.1 The recommendation to increase the categories of vehicle to which Automatic Number Plate Recognition (ANPR) camera technology, shall not apply, to include, taxis and buses, including Dial-a-Ride vehicles, flows from the revision to the Equality Analysis.

4. OPTIONS CONSIDERED AND REJECTED

- 4.1 Not reporting to TMAC on the implications (if any) of the High Court Judgement issued in respect of: TfL's and the Mayor of London's Streetspace Plan, Interim Guidance and TfL's A10 Order, was considered and rejected.

5. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

5.1 Revenue and Capital consequences of report recommendations

	Current Year	Medium Term Financial Strategy – 3 year forecast		
	2020/21 £'000	2021/22 £'000	2022/23 £'000	2023/24 £'000
Revenue Budget Available				
Expenditure Income				
Effect of decision from report*	n/a	n/a	n/a	n/a
Expenditure Income				
Remaining Budget				
Capital Budget available		25 Additional (to be part of the 21/22 LIP request to TfL)		
Expenditure Income		25 Additional Expenditure		
Effect of decision from report		25 Additional Expenditure		
Expenditure Income				
Remaining Budget				

*There are no revenue implications apart from that stated in the Report to TMAC 12/1/21

5.2 The effect of the decision

See the Report to TMAC 12th January 2021

The Report to TMAC on 12th January confirmed that the effect of agreeing and implementing the recommendation would be to incur a cost of £157,000, all of which would be met from ring-fenced grant funding. The revision of the Equality Analysis (see section 8 of this addendum report) has resulted in a slight change to the proposed Experimental LTN, namely installing temporary 'parklets' in Auckland Road incorporating seating, and monitoring their use. This is predicted to increase the project cost by approximately £25,000. Meeting this additional cost is to be included within the Council's ask to TfL when seeking release of LIP Funding for 2021/22. This additional cost (and only this additional cost) is shown in the table at 5.5 above. For full understanding of the revenue and capital consequences of the recommendations, please see the Report to TMAC 12th January.

5.3 Risks

See the January 2021 Report.

5.4 Options

See the January 2021 Report.

5.5 Future savings/efficiencies

See the January 2021 Report.

(Approved by: Geetha Blood, Interim Head of Finance, Place and Resources)

6. LEGAL CONSIDERATIONS

- 6.1 Subject to compliance with statutory processes and broader public law principles, Croydon Council is able to make an Experimental Traffic Regulation Order ('TRO') under Section 9 of the Road Traffic Regulation Act 1984 ('1984 Act'), by virtue of the Experimental Order being for the purpose of 'prescribing streets which are not to be used for traffic by vehicles, or by vehicles of any specified class or classes, either generally or at specified times' under Paragraph 2 of Schedule 1 and Section 6 of the 1984 Act. The Experimental TRO must extend for no longer than 18 months.

- 6.2 The Order may be made subject to compliance with the procedure set out in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 ('1996 Regulations'). Whilst statutory consultees are listed at Regulation 6 of the 1996 Regulations, there is no statutory requirement for public consultation. For the purposes of an experimental order, the Council is

not required to publish a notice of intention or consider objections prior to making the TRO. Croydon Council will be obliged to consider any such objections at the point of a determination as to whether the Experimental LTN becomes permanent.

6.3 Croydon Council must publish a notice on making in relation to the Experimental TRO not less than seven days prior to it coming into force. The notice must include the following statements at Schedule 5 of the 1996 Regulations:

- that Croydon Council will be considering in due course whether the provisions of the experimental order should be continued in force indefinitely
- that within a period of six months –
 - beginning with the day on which the experimental order came into force
 - if that order is varied by another order or modified pursuant to section 10(2) of the 1984 Act, beginning with the day on which the variation or modification or the latest variation or modification came into force,
 - any person may object to the making of an order for the purpose of such indefinite continuation
- that any objection must-
 - be in writing
 - state the grounds on which it is made; and
 - be sent to an address specified for the purpose in the notice making.

6.4 In addition to the statutory requirements, broader administrative law and duties ought to be considered, including the impact of case law on decision making. These have been substantively addressed within the January 2021 Report and this Addendum.

6.5 Under S121B of the 1984 Act, Croydon Council may not implement a TRO if it will, or is likely to affect a GLA Road, Strategic Road or a road in another borough unless it has notified TfL and the London Borough (as relevant) and the proposal has either (a) been approved; (b) received no objection within one month; (c) any objection has been withdrawn; or (d) GLA has given its consent after consideration of the objection.

Approved by Sandra Herbert, Head of Corporate Law and Litigation on behalf of the Director of Law and Governance & Deputy Monitoring Officer.

7. HUMAN RESOURCES IMPACT

7.1 See the January 2021 Report.

8. EQUALITIES IMPACT

8.1 The recommendations for an Experimental Traffic Order have been the subject of a detailed equality analysis. This analysis will continue to be updated and developed as new information emerges including from the monitoring of the recommended Experimental LTN (if implemented). In January, Transport for All published the report 'Pave the Way'. This reports the results of a study into the experiences of people with disabilities relating to Low Traffic Neighbourhoods implemented in London following the start of the Covid19 Pandemic. The opportunity has been taken, following publication of 'Pave the Way', to further develop the Equality Analysis which now incorporates recommendations to:

- undertake a street access audit to identify potential improvements such as footway repairs, installing dropped kerbs and reducing street clutter. The audit should be undertaken with members of the Mobility Forum when/as the lessening of the Pandemic allows.
- provide resting spaces by placing temporary 'Parklets' incorporating seating at locations in Auckland Road, and their use monitored.
- Develop the engagement strategy and monitoring strategy for the Experimental LTN with the involvement of Transport for All and members of the Croydon Mobility Forum.
- Allow taxis and buses to pass through the proposed camera enforced 'No Motor Vehicle' restrictions to facilitate access by Dial-a-Ride, taxis, SEN Transport buses and Community Transport minibuses.
- Widen exemption eligibility to holders of Blue Badge permits, enabling them to register up to two vehicles akin to the Congestion Charge scheme.

8.2 No ready solution has been identified to provide ease of access for disabled people using minicabs/private hire vehicles rather than taxis. Transport for All proposes a scheme that would grant dispensation for disabled people requiring access to their home, by any vehicle they choose. However, such a scheme is probably best developed across London with TfL, possibly facilitated by London Council's.

8.3 This Equalities Impact section should be read in conjunction with that in the January 2021 Report, when considering the recommendations.

Approved by: Yvonne Okiyo Equalities Manager

9. ENVIRONMENTAL IMPACT

9.1 Concerns about the potential effect of the Temporary LTN on air quality have been expressed by a number of people. When comments received in response to the online residents' consultation survey on the future for the Temporary LTN were categorised and collated, around 13% responding and leaving comments expressed concern about potentially increasing traffic related air pollution.

9.2 Since the meeting of TMAC on the 12th January, a report⁵ commissioned by the GLA and TfL into the air quality effects of implementing Mayoral policies, has been published. The Mayoral air quality policies considered in the study included the:

- imminent tightening of emissions standards for heavier vehicles in the London wide Low Emission Zone
- Ultra Low Emission Zones (brought forward in central London in 2019 and expansion to the inner area within the north and south circular roads in 2021); and
- London Environmental Strategy.

9.3 Chapter 3 ('New Approaches') of the London Environmental Strategy emphasises the importance of the Mayor's Healthy Streets objective and approach. Chapter 4 ('Air Quality') sets out 'Roles and Legal Duties', those for local authorities including '*improving the public realm for walking and cycling*'. The Chapter explains that actions set out within it are supported by the wider policy framework in the Mayor's Transport Strategy, which 'promotes further mode shift, tackles congestion, and encourages freight consolidation' explaining the chapter should be read alongside the Mayor's Transport Strategy.

9.4 The key findings of the GLA/TfL commissioned report include:

- In 2019, in Greater London, the equivalent of between 3,600 to 4,100 deaths (61,800 to 70,200 life years lost) were estimated to be attributable to human-made PM2.5 and NO₂, on the basis that health effects exist even at very low levels. This calculation is for deaths from all causes including respiratory, lung cancer and cardiovascular deaths.
- With the adoption of the Mayor's air quality policies and taking into account general air pollution trends, the average life expectancy of a child born in London in 2013 would improve by around 5 to 6 months.
- Without the Mayor's air quality policies and other general air pollution trends, a child born in 2013 would lose 7 to 11 months life expectancy due to air pollution.
- The mortality burden in 2019 was affected by a number of factors (population size, pollution, deprivation, age of population (as baseline mortality increases with age)):
- The greatest burden, as a proportion of the population, falls in Outer London boroughs (the top three being Bromley, Barnet and Croydon), even though pollution levels there are relatively lower, mainly due to the higher proportion of the elderly in these areas.
- Conversely, Inner London boroughs had a lower burden of air pollution related mortality due to their younger age profile. However, for other air quality related health outcomes such as asthma admissions in children, boroughs with younger populations will be more affected.
- London's population would gain around 6.1 million life years if air pollution concentrations improved, per the Mayor's air quality policies scenario, from

5

https://www.london.gov.uk/sites/default/files/london_health_burden_of_current_air_pollution_and_future_health_benefits_of_mayoral_air_quality_policies_january2020.pdf

2013 to 2050, following up the population exposed for a lifetime up to 105 years after 2050.

- The gain in life expectancy from the projected future air pollution changes is less influenced by population size than the gain in life years. The life expectancy gains were larger in Inner London, including some more deprived boroughs, probably due to the greater concentration reductions in Inner London and to variations in baseline mortality rates.

10. CRIME AND DISORDER REDUCTION IMPACT

10.1 No additional impact arising from the amended recommendations. See the January 2021 Report.

11. HEALTH IMPACT

11.1 No additional impact arising from the amended recommendations. See the January 2021 Report.

12. HUMAN RIGHTS IMPACT

12.1 No additional impact arising from the amended recommendations. See the January 2021 Report.

13 CRIME AND DISORDER REDUCTION IMPACT

13.1 See the January 2021 Report.

14 DATA PROTECTION IMPLICATIONS

14.1 See the January 2021 Report.

CONTACT OFFICER:

Ian Plowright, Head of Transport

APPENDICES TO THIS REPORT:

1. Statement provided by the Joint Executive Headteacher Pegasus Academy Trust representing her personal views and those of the staff affected.
2. Email 'HARRIS CRYSTAL PALACE Against the LTN' from Eliska Finlay, and an attached message from the Head of the School
3. Revised Equality Analysis

BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972

Email 'Cypress Primary School Statement' 12 January from Open our Roads and attached witness statement of the Joint Executive Headteacher Pegasus Academy Trust.

Email 'concerns following on-line meeting re: Cypress Scholls' 14 January 2021 from the Executive Headteacher Pegasus Academy Trust.

Formal complaint regarding the conduct of Mr Ian Plowright and his management of the Upper Norwood and Crystal Palace consultation process and the subsequent presentation to the Transport Management Advisory Committee (TMAC) on 12th January 2021 in relation to schools.

Letter from Steve Reed MP

Letter from Ellie Reeves MP

Letter from Bromley Council Chief Executive

Statement provided by the Joint Executive Headteacher Pegasus Academy Trust representing her personal views and those of the staff affected.

I am Lynne Sampson, Joint Executive Headteacher of The Pegasus Academy Trust. I share responsibility for the leadership and management of Cypress Primary School, Whitehorse Manor Infant School, Whitehorse Manor Junior School, Ecclesbourne Primary School and Beulah Infant School. I am writing, following comments made by Mark Averill at the online meeting on Monday 11th January. I have been contacted by some staff who were concerned that Mr Averill suggested no-one from the leadership team had responded to the on-line LTN consultation and in fact the one statement received could not be verified as true. During the consultation, I submitted a response through this email address as had staff, including the Heads, from other schools in our Trust. I am writing therefore to express concern that our responses seem not to have been considered and would like to reiterate the following.

1. The personal and professional lives of a significant number of staff working within The Pegasus Academy Trust have been greatly impacted by the closure of roads which are crucial for our work with over 2000 pupils in South Norwood and Thornton Heath.
2. Some staff are now seeking work elsewhere as they cannot manage the extended journey to and from work and when needing to travel between schools as we often need to do.
3. The impact of the road closures on staff wellbeing is enormous. The added journey times as well as the difficulties face in travelling between schools is causing stress and really impacting on the quality of education we are able to provide.
4. From a personal point of view my journey to Cypress Primary from Beckenham used to take seven-ten minutes. It now takes 25-40 minutes. I can no longer access Lancaster Road so cannot approach the school from there. I have to travel along the A213 where I can sit for up to 25 minutes in stationary traffic.
5. If I travel instead from Auckland Road the installation of the bus gate means I cannot access Cypress Road. Sometimes I park and walk to the school but have so much to carry I have to make several journeys thus making my start to the work day very laborious. I now leave half an hour earlier each morning but still arrive much later for work.
6. On December 16th 2020 I had to make three journeys from my car to the school to bring in packages, books and my own paperwork. I was doing this while trying to speak to the Heads at Ecclesbourne and Beulah Infants who needed immediate advice following positive COVID results at their school. It was extremely stressful.
7. Staff work across schools and need to travel easily and quickly from site to site. They can no longer do this. Cypress staff are particularly disadvantaged as staff from other schools who would come to offer support or attend training no longer want the challenge of the journey. I have had to appeal PCNS for teachers who have mistakenly driven through the bus gate or up Cypress Road not having registered their cars.
8. A teacher at Whitehorse Manor was called to her children's nursery as her children had fallen ill. The nursery is in Lewisham. It took her an hour and a half to reach the nursery by which time the children were extremely distressed and obviously she was as well.

9. A teacher at Whitehorse Manor has to visit her elderly parents at their care home in Streatham. The road closures mean that the round trip from her house in Bromley to school and then to the care home takes up to three hours extra per day.
10. I do not believe ANPR will improve the situation as the main problem which is inaccessibility to roads and large queues of stationary traffic will not be reduced. For the mental wellbeing of staff and to enable our schools to run effectively the only possible solution is to remove the traffic boulders particularly in Holmesdale Road and Lancaster Road.

Plowright, Ian

Subject: FW: HARRIS CRYSTAL PALACE Against the LTN
Attachments: Harris Academy Statement.png

From:

Sent: 14 January 2021 14:43

To: Plowright, Ian <Ian.Plowright@croydon.gov.uk>; Iles, Steve <Steve.Iles@croydon.gov.uk>; Averill, Mark <Mark.Averill@croydon.gov.uk>; Jewitt, Karen <Karen.Jewitt@croydon.gov.uk>; Ryan, Pat <Pat.Ryan@croydon.gov.uk>; Ali, Muhammad <Muhammad.Ali@croydon.gov.uk>; luke.clancy@croydob.gov.uk; Neal, Michael <Michael.Neal@croydon.gov.uk>; Ali, Hamida <Hamida.Ali@croydon.gov.uk>; Kerswell, Katherine <Katherine.Kerswell@croydon.gov.uk>; steve.reed.mp@parliament.uk

Subject: HARRIS CRYSTAL PALACE Against the LTN

Dear officers and TMAC members as well as Hamida, Katherine and Steve,

Attached please find correspondence I have had with the head of Harris Academy. Crystal Palace, inside the LTN, who has spoken to me about the impact the LTN has had on his staff and his views on the recommendation of ANPR.

Please feel free to contact him directly should you want to speak to him in more detail.

You should hopefully also now have received an email from Lynne Sampson, the executive head of Cypress Primary School from her school email address in which she expresses the same disagreements about this LTN and the recommendation of the ANPR cameras.

I do hope that 2800+ voices, the two local Labour MPs, the CEO of Bromley, **both** schools inside the LTN and a 3:2 vote in the TMAC against this scheme gives you pause to consider that perhaps this was not the most ideal location for this LTN. Are there other ways we can all work together to help reduce traffic in this area? Are there other ways we can protect cyclists in our neighbourhood? Are there other roads that need traffic calming measures? Are there less extreme ways this can be done? As I mentioned before, I am keen to work **with** you to help understand the levers that can be used to achieve many of the goals we all have, of reducing our reliance on the car and improving the air quality in our neighbourhood.

Kind regards,

--

Eliska Finlay

[REDACTED] harriscrystalpalace.org.uk>

to me ▾

Dear Ms Finlay

The results of the consultation are very much in line with the views of our staff and I share the concerns of the Executive our staff at a time when they are already under so much pressure. Many staff have mentioned approximately 16minute academy (myself included) due to the LTN restrictions and the bottle-neck it has created in Crystal Palace. This is likely some feeling like they are unable to balance teaching as a profession with their home lives. Again, something that is not only facing a pandemic but a national shortage of teachers.

If the ANPR cameras were added and our staff (at least 120 with more who come less regularly as visitors) had access concerns and stresses but I am confident that many staff would not want to have to apply for a pass through the ANPR to work to educate our nation's next generation should not be required.

Kind regards,

[REDACTED]
Head of Academy
Harris City Academy Crystal Palace

Croydon Council
Equality Analysis Form
Crystal Palace and South Norwood Experimental Low Traffic
Neighbourhood
Revision 1 (1 February 2021)

Stage 1

At this stage, you will review existing information such as national or local research, surveys, feedback from customers, monitoring information and also use the local knowledge that you, your team and staff delivering a service have to identify if the proposed change could affect service users from equality groups that share a “protected characteristic” differently. You will also need to assess if the proposed change will have a broader impact in relation to promoting social inclusion, community cohesion and integration and opportunities to deliver “social value”.

Please note that the term ‘change’ is used here as shorthand for what requires an equality analysis. In practice, the term “change” needs to be understood broadly to embrace the following:

- Policies, strategies and plans
- Projects and programmes
- Commissioning (including re-commissioning and de-commissioning)
- Service Review
- Budgets
- Staff structures (including outsourcing)
- Business transformation programmes
- Organisational change programmes
- Processes (for example thresholds, eligibility, entitlements, and access criteria)

You will also have to consider whether the proposed change will promote equality of opportunity; eliminate discrimination or foster good relations between different groups or lead to inequality and disadvantage. These are the requirements that are set out in the Equality Act 2010.

1.1 Analysing the proposed change

1.1.1 What is the name of the change?

Proposed Crystal Palace and South Norwood Experimental Low Traffic Neighbourhood

1.1.2 Why are you carrying out this change?

Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

The change is a response to past decisions and current trends. It is a response to the Mayor of London’s Transport Strategy (in particular the Healthy Streets objective) and his / TfL’s Streetspace Plan for London. It is a response to the continuing Covid19 Pandemic and to Secretary of State for Transport statements and guidance relating to it.

Past decisions were taken without any formal consideration of the equality implications. These

include parliament in the 1930's allowing streets to be given over to motor vehicles, the consequences of which began to be considered formally in the 1960's. In 1961 Ernest Marples MP chaired a Steering Group for a Ministry of Transport study looking at the 'Long Term Problem of Traffic in Towns'. The study considered the '*Deterioration of Environment*' identifying the issues relating to '*drivers are seeking alternative routes, mainly through residential areas, in order to avoid congested areas on main roads*'. The study highlighted some of the effects this was having relating to 'age', namely children. It reported '*Journey to school. In 1962, 4,287 child pedestrians between the ages of 5 and 9 years were killed or seriously injured*'. It proposed traffic levels that were compatible with play in the street and with a reasonable quality of environment. It suggested the creation of Environmental Areas (areas free of extraneous traffic) in between the Distributor Roads which would largely need to be rebuilt as major urban highways in order to accommodate the predicted levels of traffic. This approach was clearly not fully taken forward in the UK. The response to the high road casualty rate in children age 5 to 9, has largely been to deny them access to the street and to curtail their independent mobility (unlike in the Netherlands where in response to the 'Stop Child Murder' public campaign in the 60s and early 70s, Woonerf or Living Streets in which the car is the visitor, were created).

In the early 2000s, Croydon Council led a partnership of the four Councils whose boroughs meet at the 'Upper Norwood Triangle' to deliver a Single Regeneration Budget programme. The centrepiece of the programme was a project to 'improve' the Triangle itself. Several traffic arrangements were considered. The one selected and implemented was to turn the Triangle into a one-way traffic gyratory. It was known at the time that to do so would increase the traffic going around the Triangle by around 50%. This was not because the scheme was predicted to generate more traffic, rather the same traffic would need to travel along more sides of the Triangle to get to its destination. The strategy to protect the environment within the Triangle from this increased traffic, was to use the traffic signals at each corner of the Triangle to que traffic on the approach arms to the Triangle, rather than within it. Such a strategy only works if traffic cannot find alternative routes to avoid the que, and seeks to sacrifice one 'environment' for the protection of another.

Since 2009, vehicle miles on London's streets has grown significantly. The growth has been entirely on the minor unclassified roads / streets, such that the minor street network is now carrying almost as much traffic as the A Road network.

The above changes were not subject to any formal equality assessment. The following equality analysis relates to a proposed trial project (the Crystal Palace and South Norwood Experimental Low Traffic Neighbourhood) that aims to address some of the effects arising from above.

1.1.3 What stage is your change at now?

See **Appendix 1** for the main stages at which equality analyses needs to be started or updated.

The current temporary Low Traffic Neighbourhood was implemented in stages in a reactive manner as a response to the Covid19 Pandemic. Options for the future of the temporary scheme are being considered, including removal or keeping the scheme largely as is. It is proposed to move to trial LTN with camera enforced restrictions, rather than physical closures, with exemptions for vehicles belonging to residents living within the trial LTN.

1.2 Who could be affected by the change and how

1.2.1 Who are your internal and external stakeholders?

For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

The main internal stakeholders are the Council administered, Mobility Forum, the Cycle Forum, the Public Transport Liaison Panel, the Councilors for the Crystal Palace and Upper Norwood and the South Norwood wards, Cypress School, the SEN Transport Service, Public Health, the Active Lifestyles Service and Council contractors including Veolia.

External stakeholders include:

- Residents living within the proposed trial LTN area, those living on the main streets that form the edges of the trial LTN, and those living beyond the LTN.
- Businesses including those at the Upper Norwood Triangle
- Non-local authority schools namely Crystal Palace and South Norwood Harris Academies
- St John the Evangelist Church
- Harris Academy Crystal Palace School
- The Auckland Surgery
- St Pauls Church, Hamlet Road
- Transport for London
- The emergency services
- Bromley Council

1.2.2 What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

The proposed trial is a continued response to the Covid Pandemic following the Secretary of States call for continuing action to help people to walk and to cycle rather than to use public transport or to drive. It is also intended to deliver the Mayor of London's Healthy Streets objective within the trial LTN area. It is intended to provide quieter streets facilitating healthy and active travel, play and social interaction / community building. By facilitating active travel the proposal is a part of enabling people to exercise as part of their daily travel routine, to help them be a healthy weight, to stay healthy longer, to improve air quality and to help address the climate change emergency.

1.2.3 Does your proposed change relate to a service area where there are known or potential equalities issues?

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. If you don't know, you may be able to find more information on the Croydon Observatory (<http://www.croydonobservatory.org/>)

Yes. It relates to:

Public Health and known health inequalities in Croydon, inequalities strongly associated with deprivation

<https://www.croydonobservatory.org/wp-content/uploads/2016/11/JSNA-Geographical-Health-Inequalities-2009-10.pdf> and the Health and Wellbeing Strategy aiming to tackle the inequalities <https://democracy.croydon.gov.uk/documents/s13992/Health%20and%20Wellbeing%20Strategy%20-%20Final.pdf> the objectives of which include:

- Ensure children and young people have the best physical and emotional environments for growing up.
- Reduce health inequalities by developing strong, inclusive and well-connected communities.
- Make improving mental health and wellbeing everyone's business.
- Get more people more active, more often. Reducing social isolation and driving improvement in health through social, cultural and physical activities.
- Support people to remain healthy and independent for longer by preventing the conditions that cause ill health.

Air Quality Management and the known (largely age related) inequalities relating to poor air quality. The Mayor of London's Environment Strategy tells us that:

- 'Human health is affected by poor air quality. This is particularly true for disadvantaged people like children, older people, and those with pre-existing health conditions.'
- '... younger children are among the most vulnerable to its health impacts. Eight and nine year-olds living in cities with high levels of fumes from diesel cars have up to ten per cent less lung capacity than normal.'
- '... air pollution has a big impact on health at all life stages, from development in the womb to the end of life. A baby born in 2010 and exposed to that same level of air quality for its entire life would lose around two years of life expectancy. There is also strong evidence that poor air quality affects children's lung development, and emerging evidence that improving air quality can reverse those effects. There is also increasing evidence of the link between exposure to pollution and dementia.'

Hence the relevance of the Council's Air Quality Management Plan

<https://www.croydon.gov.uk/environment/pollution/air-pollution/final-air-quality-action-plan-2017>

and in particular the action:

- 'Provision of infrastructure to support walking and cycling '

Climate Change and Croydon being Carbon Neutral by 2030

<https://www.croydonclimate.org.uk/about-croydon-climate-crisis-commission> . Unlike older people, those who are children and young people today will increasingly experience the effects of Climate Change.

Transport Planning

Cycling is potentially available to nearly all. TfL has assessed Croydon having the greatest Cycling Potential (largest number of journeys that could be cycled) of all London boroughs. However, Croydon has the lowest cycle mode share of all the London Boroughs at 1%. Consequently a lot of Croydon people from all groups are being denied the health, access an economic benefits of

Meaningful engagement with disabled people in the community,

Equalities analysis should be undertaken by a professional with expertise in disabled access, and coproduced with disabled residents where possible. The EQIA should be specific to the scheme, and detailed and thorough enough to identify the problematic areas and put forward solutions to mitigate impact

Accessible implementation:

- We recommend that a full audit is undertaken for each scheme to ensure compliance with accessibility standards, including preventing planters from blocking dropped kerbs, ensuring planters/bollards are placed far enough apart to allow wheelchairs through, sufficient tactile signage, etc.
- Softer approach: In some areas, it may be appropriate to trial timed closures, or alternatively a gradual phase in of restrictions (rather than all at once). This could only be done so long as these changes are communicated extremely efficiently to ensure residents are confident about what changes are happening and when.
- Dispensation for disabled people: We suggest that ANPR cameras are used to filter traffic, allowing access for specific vehicles. It is important to note that not all disabled people who require accommodations have a Blue Badge. Of our participants, only 51% hold a Blue Badge. For that reason, we recommend Local Authorities implement a scheme that grants dispensation for disabled people requiring accommodation to access their home by any vehicle they choose, including taxis. This should be independently arbitrated by an organisation or individual with expertise in access and trained in Disability Equality.

<https://www.transportforall.org.uk/wp-content/uploads/2021/01/Pave-The-Way-full-report.pdf>

1.2.4 Does your proposed change relate to a service area where there are already local or national equality indicators?

You can find out from the Equality Strategy <http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf>). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Croydon Council 'Opportunity and Fairness Plan' 2016-2020

https://www.croydon.gov.uk/sites/default/files/articles/downloads/Opportunity_and_Fairness_Plan.pdf In particular addresses the inequality around:

SOCIAL ISOLATION: A CONNECTED BOROUGH WHERE NO ONE IS ISOLATED

COMMUNITY COHESION: VIBRANT, RESPONSIBLE AND CONNECTED COMMUNITIES

HEALTH: HELP PEOPLE FROM ALL COMMUNITIES LIVE LONGER, HEALTHIER LIVES (in particular 'Create and develop healthy and sustainable places and communities')

https://lbcccloudadcroydongov.sharepoint.com/sites/col-15/ic/Documents/WEB_200009_Equalities_Annual_Report%202019.pdf

The above three areas of inequality are interrelated. Research

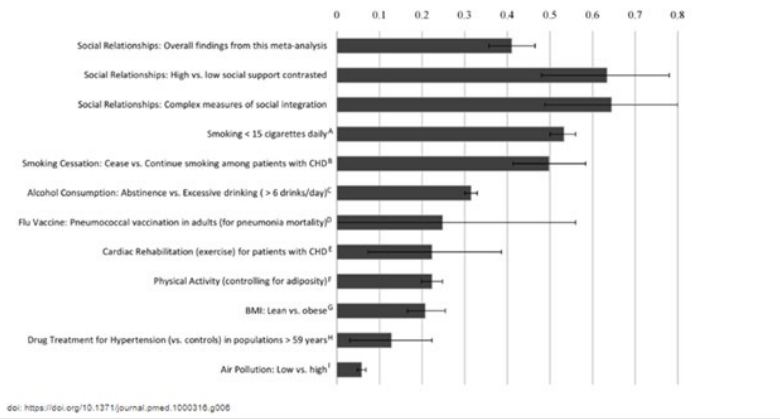
<https://journals.plos.org/plosmedicine/article%3Fid=10.1371/journal.pmed.1000316#pmed-1000316-g006> indicates how that lack of social relationships is one of the biggest health risk factors

Social Relationships and Mortality Risk: A Meta-analytic Review

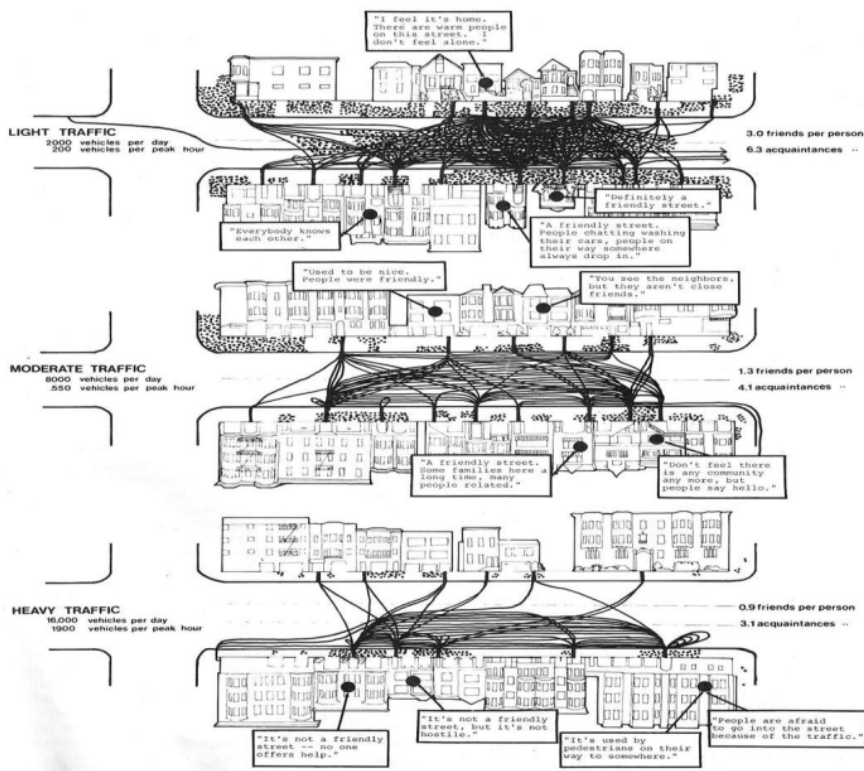
Figure 6

Comparison of odds (I²) of decreased mortality across several conditions associated with mortality.

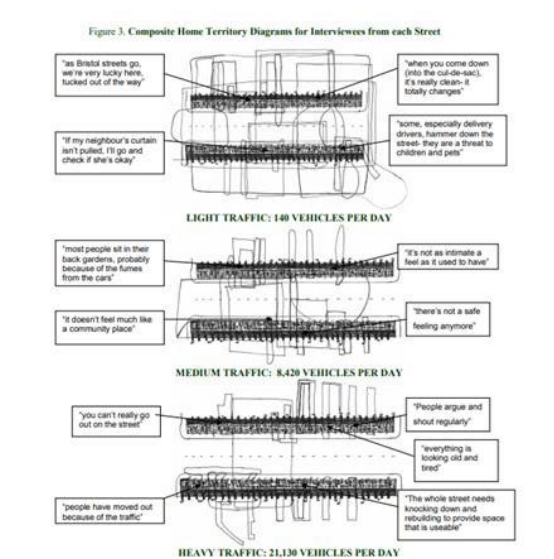
Note: Effect size of zero indicates no effect. The effect sizes were estimated from meta-analyses: A = Shavelle, Paolitto, Strauss, and Kush, 2008 (20); B = Critchley and Capewell, 2002 (20); C = Holman, English, Milne, and Winter, 1999 (20); D = Fine, Smith, Carson, Maffe, Sankey, Weissfeld, Deskey, and Kapoor, 1994 (20); E = Taylor, Brown, Strahan, Joffe, Norman, Rees et al., 2004 (20); F = Katzmarzyk, Janssen, and Alderman, 2003 (20); G = Insua, Saiz, Lau, Lau, Retman, Pagano, and Chalmers, 1994 (21); H = Schwartz, 1994 (21).



The number of social relationships in turn is influenced by the speed and volume of traffic in the street where a person lives. Donald Appleyard as far back as 1969, demonstrated that people living on a street with relatively heavy traffic had only one-third as many social connections as people living on a relatively light-traffic street. Subsequent studies investigated street design, traffic, and neighbourhood quality of life; work that culminated with the publication of *Livable Streets* (Appleyard, 1981). *Livable Streets* revealed the social impacts of motor traffic in fine detail through interviews and street observations, demonstrating that casual conversations, children's play, and other street-based social life tend to be suppressed, particularly as vehicle volumes and speeds increase. The 1969 study included the iconic diagram which visually represented the erosion of social interaction as traffic volumes increase.



A decade ago, researchers replicated Appleyard's methodology in Bristol producing the report 'Driven To Excess: Impacts of Motor Vehicles on the Quality of Life of Residents of Three Streets in Bristol UK'. They reported that quality of life in cities and towns is of increasing concern to the public, and to policymakers and a major threat to quality of life is the high volume of motor vehicle traffic, associated with a wide range of mental and physical health detriments. The results confirmed that Appleyard's findings are applicable to the UK in the 21st century; specifically that the number of friends and acquaintances reported by residents was significantly lower on streets with higher volumes of motor traffic. The extent of people's 'home territories' also diminished as motor traffic increased. Other notable outcomes from the research include the finding that individuals' perceptions of road safety in their neighbourhood may be disproportionately influenced by the traffic conditions on their street of residence, especially affecting the degree of independence granted to children.



TfL's 'Attitudes Towards Walking: Segmentation Study' (2014)

<http://content.tfl.gov.uk/attitudes-to-walking-2014-summary.pdf> reports on the key 'drivers' of walking. These are gender, age & lifestage, car ownership, income and whether live in central, inner or outer London, concluding:

I Females travel more stages per day and walk more stages per day compared to males, although females travel and walk a shorter distance per stage compared to males

I People aged 20-44 walk more stages per day than older people

I Combining age and gender makes the differences greater (see Figure 2):

■ Females aged 20-44 walk the most stages per day. There is a particular difference in walking activity between females and males aged 35-44

I Lifestage appears to be a key differentiating factor:

■ Single adults, with or without children, walk more stages per day than adults in couples

I Further differences are seen by gender

■ Males in a couple with children walk the fewest stages per day, particularly compared to single adult males

■ Females with children, either in a couple or single, walk more than those without children

TfL undertook an annual Attitudes Towards Cycling survey <http://content.tfl.gov.uk/attitudes-to-cycling-2016.pdf> which contains a good many indicators relating to gender, age ethnicity

Profile of cyclists (Sept 2016)



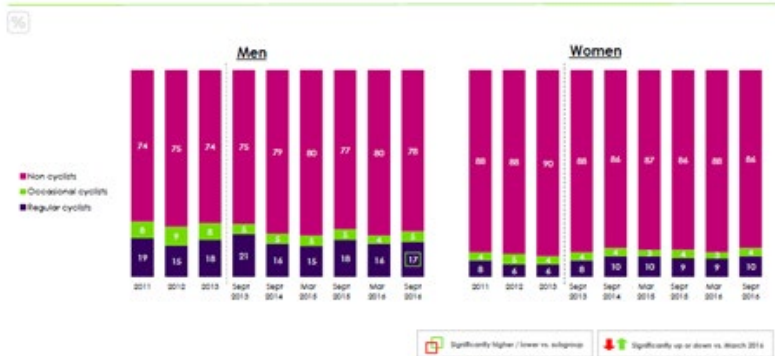
Profile of cyclists (Sept 2016)



Demographic questions
Base: N=Sept 2016

33

Profile of cyclists (trend)

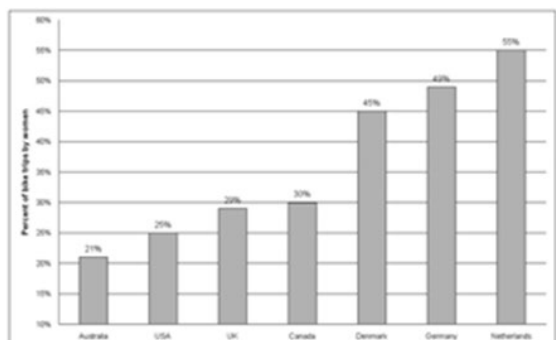


Percentage able to ride a bike (Sept 2016)



Q8E1: Can you ride a bicycle?
 Base: All respondents, Sept 2016 (2316)

The study ‘**Making Cycling Irresistible: Lessons from The Netherlands, Denmark and Germany**’, JOHN PUCHER and RALPH BUEHLER (2008) looked at gender and age differences in cycling across countries. On the difference rates of cycling amongst men and women, the study reported that not only do the Netherlands, Denmark and Germany have high and growing levels of cycling, but their cyclists comprise virtually all segments of society. Women are just about as likely to cycle as men, making 45% of all bike trips in Denmark, 49% in Germany and 55% in the Netherlands.

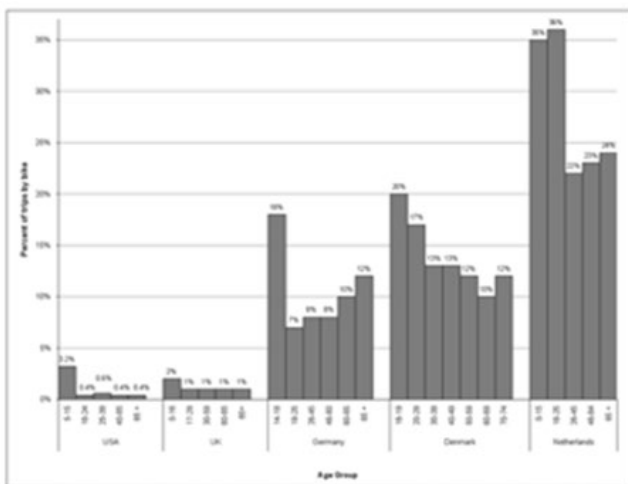


Sources: German Federal Ministry of Transport (2003); U.S. Department of Transportation (2003); Danish Ministry of Transport (2005); Statistics Netherlands (2005); Australian Bureau of Statistics (2007); Department for Transport (2007) and information provided directly by bike planners in Canadian provinces and cities

Figure 8. Women’s share of total bike trips in Australia, the USA, the UK, Canada, Denmark, Germany and the Netherlands (2000-2005).

While cycling is gender-neutral in those three countries, men dominate cycling in the UK and the USA, where they make 72% and 76% of all bike trips, respectively.

Regarding ‘age’ the study reported that another dimension of cycling’s universality in the Netherlands, Denmark and Germany is the representation of all age groups. Children and adolescents have the highest rates of cycling in almost every country. As shown in Figure 9, however, cycling levels in the Netherlands, Denmark and Germany remain high even among the elderly. In Germany, the bike share of trips rises steadily from 7% among 18- to 24-year olds to 12% for those 65 and older. The bike share of trips declines with age in Denmark, but even among those aged 70–74 years old, cycling accounts for 12% of all trips, the same as among Germans who are 65 and older. The Dutch elderly double that percentage, making 24% of all their trips by bike. Cycling rates are low for all age groups in the USA, but they also decline with age: from 3.2% among children 5–15 years old to only 0.4% of trips for those 40 and older. Similarly, the bike share of trips falls from 2% among British children to 1% among older age groups. The bike share of trips for the Dutch elderly is 24 times higher than for British elderly. The bike share of trips for both the German and Danish elderly is 12 times higher than for British elderly.



Sources: German Federal Ministry of Transport (2003); U.S. Department of Transportation (2003); Danish Ministry of Transport (2005); Statistics Netherlands (2005); Department for Transport (2007)

Figure 9. Bicycling share of trips by age group in the USA, the UK, Germany, Denmark and the Netherlands (2000-2002).

Age Differences in Independent Mobility

The Policy Studies Institutes study 'Children's Independent Mobility: A Comparative Study in England and Germany 1970 – 2010'

http://www.psi.org.uk/images/uploads/CIM_Final_report_v9_3_FINAL.PDF

reported on the dramatic decline in children's independent mobility in England relative to Germany and the psychological and other consequences this was having for English children. The study also looked at race and gender difference in children's independent mobility.

The Policy Studies Institute (and others) has continued to research this topic including a study <https://www.nuffieldfoundation.org/project/independent-mobility-and-child-development-2> which looked at the degree to which children of different ages have the freedom to travel to school, friends, shops and other destinations unaccompanied by adults across ten countries in order to identify factors affecting the independent mobility of children and the implications for child development.

Summary of results

- Overall, Finland is the top-performing country across almost every independent mobility indicator in this study, coming second only to Germany for children's self-reported freedom to travel on local buses alone.
- In 2013, Unicef published a comparative overview of child well-being across twenty-nine OECD and EU countries (Unicef, 2013) using national data from 2009 and 2010, coinciding with the start of data collection for this study of children's independent mobility. The Policy Studies Institute report found that there is a positive correlation between Unicef well-being scores and the rank scores measuring children's degree of freedom to travel and play without adult supervision in these countries. There is also a positive correlation between the education attainment of children, based on national Programme for International Student Assessment (PISA) rankings in 2009 and children's degree of freedom to travel and play without adult supervision in these countries.
- Of the three factors examined, traffic seems to be the strongest factor affecting the granting of independent mobility, with 'strangers' showing a weak effect and community supervision not being a factor. However, the correlation between traffic deaths and the ranking of countries for independent mobility is weak. On the other hand, almost all of the countries with the highest levels of children's independent mobility have national policies to promote walking or cycling, and the local authorities in these countries are permitted to set lower speed limits than those defined at the national level.

Arising from the research findings and discussion, the report makes four observations and seven

recommendations.

Observations

1. Unsafe environments for children are widely tolerated
2. Withholding independent mobility may only defer risk to older children
3. Action is needed to address parental concerns, road user behaviour, the physical environment, social and cultural factors
4. Change in transport policy and behaviour may be resisted but it actually happens all the time

Recommendations

1. Implement and enforce stringent road safety measures
2. Reduce car dependency and the dominance of traffic in the public realm
3. Put the needs of children at the heart of urban development ' cities that work for children, work for everyone
4. Explicitly incorporate children's independent mobility into policy
5. Adopt Daylight Saving Time to allow children to better utilise daylight hours and reduce road casualties
6. Invest in research to consolidate and develop knowledge on children's independent mobility
7. Create a national challenge fund to catalyse and drive action to improving children's independent mobility

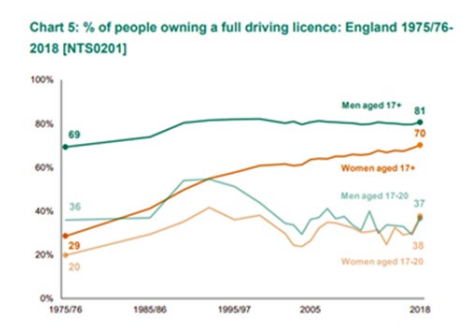
Cycling by People with a Disability

The Wheels for Wellbeing annual survey 'Assessing the needs and Experiences of Disabled Cyclists' (2018) <https://wheelsforwellbeing.org.uk/wp-content/uploads/2019/04/Survey-report-FINAL.pdf> was based on responses from over 200 disabled cyclists across the UK. It reports that 72% of disabled cyclists use their bike as a mobility aid, and 75% found cycling easier than walking. Survey results also show that 24% of disabled cyclists bike for work or to commute to work and many found that cycling improves their mental and physical health. Inaccessible cycle infrastructure was found to be the biggest barrier to cycling.

Age and Gender Difference in Travelling

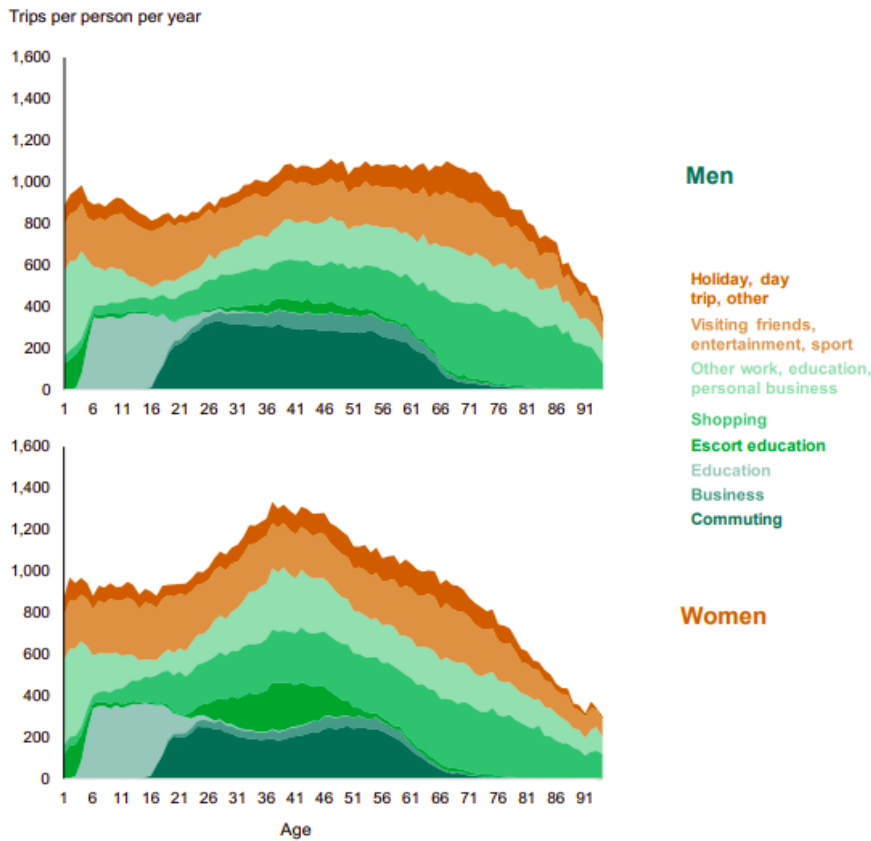
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/823068/national-travel-survey-2018.pdf

In England as a whole, the percentage of women having a driving licence has increased considerably since the mid 1970's but is still below the percentage of men. The trend is different amongst the youngest drivers.



Older women make fewer journeys than older men. Women make more journeys escorting children to education

Chart 22: Average trips per person per year, by purpose, age and gender: England 2002/2018 average [based on NTS0611]



‘Young People’s Travel – What’s Changed and Why? Review and Analysis’ (2018)

<https://www.gov.uk/government/publications/young-peoples-travel-whats-changed-and-why>

Young adults (age 17 to 29) in Great Britain and other countries are driving less now than young adults did in the early 1990s.

Travel in London: Understanding our diverse communities 2019

<http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

This TfL document contains information on a series of equality indicators. Some example extracts are shown below

Frequency of walking (2016/17) [11]

%	All	White	BAME	Black	Asian	Mixed	Other
Base	(17,560)	(11,173)	(6,099)	(1,984)	(3,049)	(470)	(596)
5 or more days a week	84	82	86	86	86	87	82
3 or 4 days a week	5	6	5	4	5	4	6
2 days a week	4	4	3	4	3	2	2
1 day a week	2	3	2	2	2	2	3
At least once a fortnight	0	0	0	0	0	0	1
At least once a month	1	1	0	0	0	0	0
At least once a year	0	0	0	0	0	1	0
Not used in last year	1	1	1	1	1	0	0
Never used	3	3	2	2	2	5	5

LTDS data in this report excludes children aged under five.

Proportion of Londoners (aged 17+) with a full car driving licence (2016/17) [11]

%	All	White	BAME	Black	Asian	Mixed	Other
Base	(14,899)	(9,831)	(4,831)	(1,554)	(2,501)	(308)	(468)
Holds a full car driving licence	65	71	54	48	57	57	55

Figures include all Londoners aged 17 and over.

Household access to a car (2016/17) [11]

%	All	White	BAME	Black	Asian	Mixed	Other
Base	(17,560)	(11,173)	(6,099)	(1,984)	(3,049)	(470)	(596)
0 cars	35	35	36	45	27	41	44
1 car	44	44	44	42	47	41	40
2+ cars	21	21	20	13	26	18	16

LTDS data in this report excludes children aged under five.

Proportion of Londoners who cycle (November 2017) [16]

%	All	White	BAME
Base	(2,367)	(1,597)	(770)
Cyclist (used a bike to get around London in the last 12 months)	17	18	17
Non-cyclist (not used a bike to get around London in the last 12 months)	83	82	83

Dial-a-Ride membership by ethnicity (2016) [2, 30]

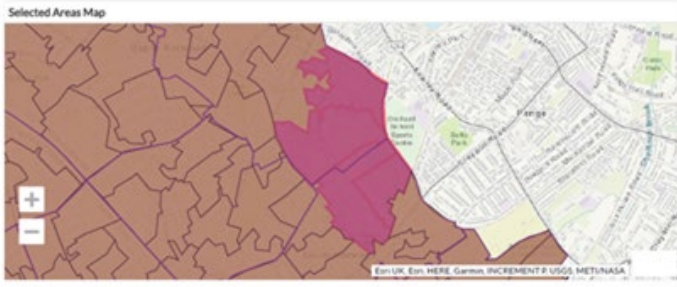
%	All disabled Londoners	Dial-a-Ride members	65-79 years-old	80-89 years-old	90+ years old
Base (excludes unknown data)	-	(39,166)	(9,404)	(14,177)	(8,573)
White	66	68	56	72	88
BAME	34	32	44	28	12

Proportion of Londoners using types of transport at least once a week (2016/17) [11]

%	Disabled	Disabled 16-64	Disabled 65+	Non-disabled (All)	Non-disabled 65+
Base	(1,729)	(789)	(863)	(15,831)	(1,828)
Walking	81	88	70	96	95
Bus	58	64	48	60	72
Car (as a passenger)	42	40	41	45	41
Car (as a driver)	24	26	25	39	52
Tube	21	30	13	43	35
National Rail	9	12	5	17	15
Overground	7	10	3	12	8
PHV (minicab)	10	12	8	10	4
Taxi (black cab)	3	3	3	2	2
DLR	3	5	2	5	1
Tram	2	3	1	2	2
Motorbike	-	1	-	1	1
Net: Any public transport (bus, Tube, National Rail, DLR, London Overground, tram)	61	69	52	74	78

LTDS data in this report excludes children aged under five.

1.2.5 Area Baseline: The Croydon Observatory Custom Area Reporter enables selected information to be extracted based on small output areas. Those areas cannot exactly equate to the area of the notional boundary of the temporary and proposed trial LTN. The areas selected / approximating to the LTN and for which data have been extracted, are indicated below in purple.



Car Availability



1%

Households with 4+ cars or vans
(2011) [View Data](#)

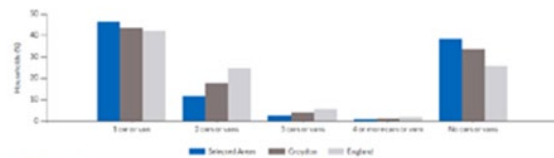


39%

Households with no car/van
(2011) [View Data](#)

39% of households have no car available

Number of cars or vans per household



Source: ONS Census 2011

	Selected Areas		Croydon		England	
	Count	%	Count	%	Count	%
1 car or van	1,274	40.6	65,583	43.6	9,201,776	42.2
2 cars or vans	317	11.6	25,836	17.6	5,441,340	24.7
3 cars or vans	48	2.5	3,571	2.8	1,202,865	5.5
4 or more cars or vans	23	0.8	1,897	1.3	424,862	1.9
No cars or vans	1,033	38.5	48,533	33.5	5,691,251	25.8

Health and Disability



50%

Population with very good health
(2011) [View Data](#)



1%

Population with very bad health
(2011) [View Data](#)



6%

Population whose activity is limited a lot
(2011) [View Data](#)

Age



23%

Percentage of the population aged 0-17
(2019) [View Data](#)

Gender



6,301

Total population estimate
(2019) [View Data](#)



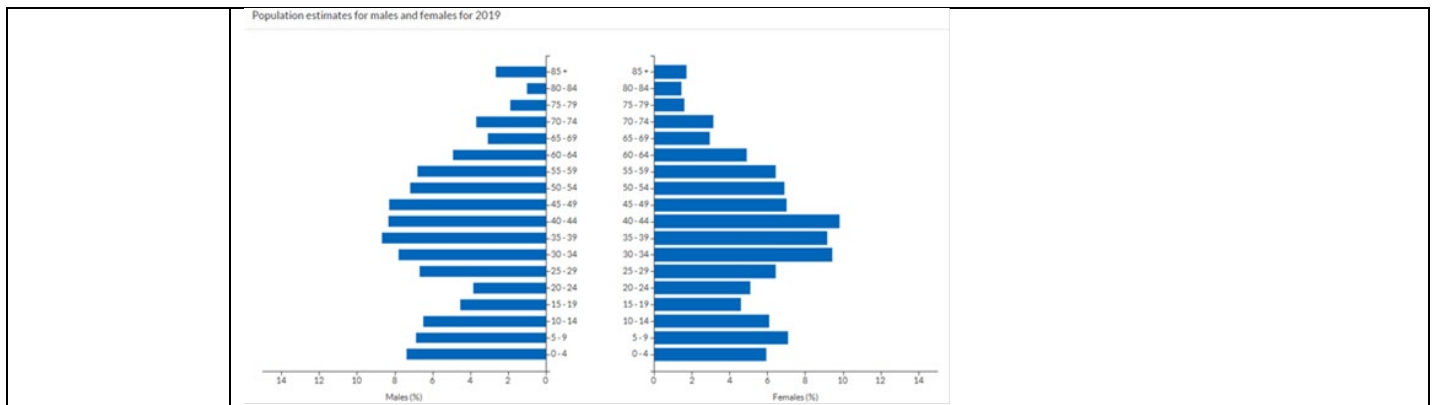
3,034

(48.2%)
Male population estimate
(2019) [View Data](#)

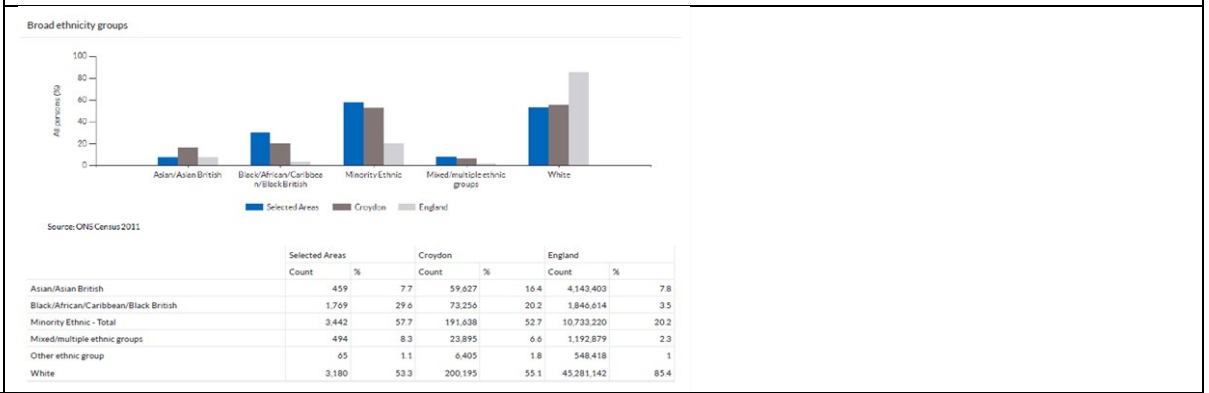
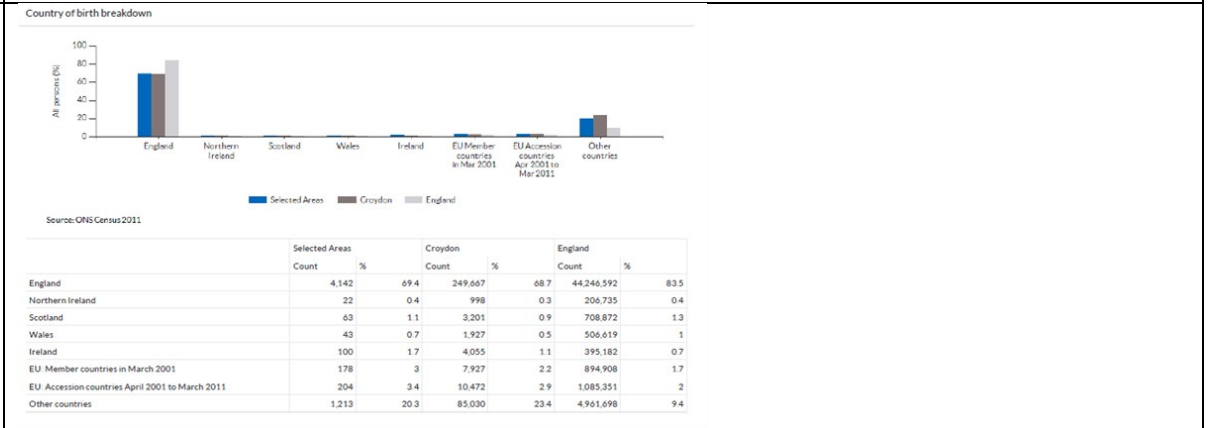


3,267

(51.8%)
Female population estimate
(2019) [View Data](#)



Race and Ethnicity



1.2.6 Analyse and identify the likely advantage or disadvantage associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	Under the proposed trial, residents living within the notional LTN area, having a car registered to their home address and needing to use a car, will be able to use their car with the same ease they enjoyed before the temporary LTN was introduced. A number of people and the	In 2011, the percentage of people living in the area with very bad health or whose activity was limited a lot, was 7%. The proposal is intended to help people choose to travel actively to help stay healthy longer. For those that already are in very bad health and needing care, the proposed trial restriction on motor vehicles includes an

	<p>Auckland Surgery have pointed out the need for some older and disabled residents living outside of the LTN area to access the Surgery by car. By moving the bus gate to be by the Surgery, patients will be able to drive to it from either direction in Auckland Road.</p> <p>People with disabilities who currently cycle will be aided by the proposal as will those that do not currently cycle but would like to.</p> <p>Users of the Disabled Persons Freedom Pass should enjoy a quicker and more reliable journey on the 410 as it passes through the trial LTN area. TfL's monitoring of the Temporary scheme suggests that buses on routes bounding the Temporary LTN were not significantly affected by the temporary scheme, compared to the effect of the temporary scaffolding in Church Road.</p> <p>Users of Dial-a-Ride and SEN Transport buses, and people with a disability using Community Transport, should have a quicker and more reliable journey via Auckland Road.</p> <p>Taxicard users will have an improved journey via Auckland Road if in a Taxi during the Experimental LTN compared with the Temporary LTN. If in a Private Hire vehicle, they will not be able to pass through the 'bus gate' necessitating a different route.</p>	<p>exemption for district nurses. However, not all carers will be provided with an exemption and for some accessing particular premises by car will require a longer route.</p> <p>People with a disability living beyond the trial LTN area, reliant on cars for travel, needing to access premises within the trial LTN area, may have to take a longer route compared to those walking, cycling or using the 410 bus.</p> <p>People with a disability living beyond the trial LTN area, reliant on cars for travel who previously used Auckland Road to avoid congestion on the A Roads, would not be able to. However in this respect, they would not be disadvantaged relative to non-disabled people living beyond the LTN.</p> <p>Users of Dial-a-Ride and SEN Transport buses, and people with a disability using Community Transport, may have an increased journey time, if the journey previously involved going via streets that will be subject to the 'No Motor Vehicle' restrictions.</p> <p>SEN Transport drivers using cars, and Private Hire cars hired for SEN Transport will not be able to pass through the 'No Motor Vehicle' restrictions. Those using taxis and minicabs may incur extra journey distance, time and cost if taxis and minicabs are unable to pass through all the camera enforced restrictions.</p>
Race/ Ethnicity	None specific (see community Cohesion)	None specific
Gender	TfL's Attitudes to Walking study indicates that women travel more stages per day and walk more stages per day compared to men, although women travel and walk a	None specific

	<p>shorter distance per stage compared to men. Men and women should both be helped by the improved walking environment, but helped differently. Women helped to make the more frequent but shorter trip stages they walk.</p> <p>Both the TfL Attitudes to Cycling research and Sustrans' 'What Stops Women Getting on Their Bikes' study, report that fear of road danger is the biggest thing deterring women cycling. Providing quieter and safer street space is intended to address this.</p>	
Transgender	None specific	None specific
Age	<p>The proposed trial is intended to create a network of quieter and safer streets to foster walking and cycling. Children and young people are amongst those likely to be benefiting the most. A quarter of the population in the Trial LTN area is under the age of 18 and consequently cannot drive. Many will be living in the households in the area which do not have access to a car or a van. Nationally, young adults are significantly less likely to hold a driving licence and driving less than they did in the past. Aiding walking and cycling including to public transport will benefit this group.</p> <p>Children are the group whose independent mobility has been curtailed the most as streets have been taken over by more and more cars. Providing quieter and safer streets provides space in which children can more easily regain their independent mobility, play and socialise. The same quieter streetspace can help them get a little closer to the levels of cycling seen amongst their north European counterparts.</p>	None specific. Disadvantage may be Disability related. See 'Disability above'

	<p>Quieter streets may well be a factor in enabling older people to keep cycling or to choose cycling and could help the percentage of cycle trips made by older people get a little closer to some of those in northern Europe, something made feasible at Crystal Palace my modern E-bikes.</p> <p>The degree to which children's access to active travel and to play in the street puts them at risk of being overweight and associated medical conditions, both in childhood and later in life. Behaviours (including travel behaviour) learnt in childhood are often taken into later into life. Facilitating active travel in early life is part of ensuring good health as an adult and older adult.</p> <p>The Mayor's Healthy Streets objective is a key part of his approach to tackling climate change. Those that are young today, are the ones that will be experiencing the worst effects of climate change when older adults.</p> <p>As people get older, particularly beyond the age of 70 when the driving licence has to be renewed every five years, fewer may have driving licenses / be driving.</p>	
Religion /Belief	None specific	None specific
Sexual Orientation	None specific	None specific
Pregnancy and Maternity	Information has not been found specifically relating to Pregnancy and Maternity. However TfL's Attitudes Towards Walking research indicates that women with children, either in a couple or single, walk more than those without children, and it is likely that amongst these women, some will be pregnant and / or in maternity	Some women in the latter stages of pregnancy, may feel walking is difficult, but If they have a car available may still be able to drive. Those living outside of the trial LTN area but needing to reach premises within the LTN may have an extended driving route / journey time but will still have access.
Social inclusion issues	The work of Appleyard in the 1960s and replicated in Bristol a	Many living outside of the trial LTN may wish to drive to visit a friend or

	decade ago shows how the number of friends and acquaintances a resident of a street has declines, as the volume of traffic increases. Creating a quieter and calmer street environment is a means of increasing social inclusion and reducing isolation.	relative living within the LTN. If they chose to do so, they will still be able to do so, but the journey time / distance might be increased.
Community Cohesion Issues	See above. The street has historically been where much of the life of the town/city takes place. It was community space which also happened to have a movement function. Lowering traffic levels has the potential for the role of the street as community space to return to a degree depending on the residual traffic level. This in turn fosters community cohesion and enables the fostering of good relations between members of groups with protected characteristics and others (something difficult to achieve if everyone travels to and from their own home, in their own car).	See above
Delivering Social Value	The trial project is intended to support delivery of the Mayors Health Streets objective, in turn delivering value and savings in relation to mental and physical health	None

1.2.7	<p>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</p> <p>For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation</p>
--------------	--

Crystal Palace is at the top of a hill. There is likely to be need for additional action to help people consider the use of E-Bikes. Also the need for seating/rest spaces especially in Auckland Road

1.2.8	<p>Would your proposed change affect any protected groups more significantly than non-protected groups?</p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....</p>
--------------	---

Yes. The project is intended have a significant positive effect on children and young people.

1.2.9 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do not?

In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes *etc.*

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

Yes. The project is intended to increase the opportunity for children to travel independently and to socialise and play.

1.2.10 As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?

In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

Do Not Know. No means have been identified by which the trial scheme might help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic.

1.2.11 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?

In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation *etc.*

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Yes. The proposed change has the potential to very strongly help foster good relations between people who belong to most of the protected groups and those who do not, by better enabling friendships and acquaintances to develop in streets with less traffic, and enabling the street to regain some of its historic community space function.

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
<p>No, further equality analysis is not required</p>	<p>Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	
<p>Yes, further equality analysis is required</p>	<p>Please state why and outline the information that you used to make this decision. Also indicate</p> <ul style="list-style-type: none"> • When you expect to start your full equality analysis • The deadline by which it needs to be completed (for example, the date of submission to Cabinet) • Where and when you expect to publish this analysis (for example, on the council website). <p>You must include this statement in any report used in decision making, such as a Cabinet report.</p>	<p>The Analysis should be further informed by research conducted during the trial, research focused on the experiences of those of groups with protected characteristics predicted to be affected by the trial.</p> <p>There should be a dialogue with Dial-A-Ride, Community Transport and SEN Transport operators and with users to help refine the operation of the trial and this Analysis.</p> <p>The Croydon Mobility Forum has been unable to meet during the Pandemic. The Forum should be engaged with during the operation of the trial, its views informing the Analysis, the operation of the trial and the design and operation of any scheme that might follow the trial</p>

Decision	Guidance	Response
		The Equality Analysis should be concluded before any decision is made on the outcome of and the future for the trial and should be published as part of the documents used in making the recommendation.
Officers that must approve this decision	Name and position	Date
Report author	Ian Plowright, Head of Transport	1 February 2021
Director	Steve Iles, Director of Public Realm	5 February 2021

1.4 Feedback on Equality Analysis (Stage 1)

Please seek feedback from the corporate equality and inclusion team and your departmental lead for equality (the Strategy and Planning Manager / Officer)

A Full analysis is required because we already know that the change could have a different / significant impact on individuals with disabilities. A full analysis will enable us the Council to ensure the decision is informed by research conducted during the trial, research focused on the experiences of those of groups with protected characteristics predicted to be affected by the trial. This will provide the opportunity for those most likely to be impacted by the trial to informing the Analysis, the operation of the trial and the design and operation of any scheme that might follow the trial

Name of Officer	Yvonne Okiyo	
Date received by Officer	01.02.2021	Please send an acknowledgement
Should a full equality analysis be carried out?	Yes	.

2 Use of evidence and consultation to identify and analyse the impact of the change

Use of data, research and consultation to identify and analyse the probable impact of the proposed change

This stage focuses on the use of existing data, research, consultation, satisfaction surveys and monitoring data to predict the likely impact of proposed change on customers from diverse communities or groups that may share a protected characteristic.

Please see Appendix 2 (section 2) for further information.

2.1	Please list the documents that you have considered as a part of the equality analysis review to enable a reasonable assessment of the impact to be made and summarise the key findings.
------------	--

This section should include consultation data and desk top research (both local and national quantitative and qualitative data) and a summary of the key findings.

Documents are referenced in section 1 above. The results of the consultation, feedback prior to the consultation and feedback at the Traffic Management Advisory Committee have also been used

In summary key findings include:

- Children and young people are the ones who's independent mobility has been curtailed the most by changes in the way streets are managed and used, and consequently are amongst those potentially benefitting the most from Low Traffic Neighbourhoods
- Just under a quarter of the population within the area of the proposed Experimental LTN are under the age of 18 and consequently do not drive
- Young adults are less likely than older adults to have a driving licence or own a car
- The residents and business consultations on the future for the Temporary LTN failed to reach children and many young people.
- High traffic streets / low people streets impact on Community cohesion and on mental health
- In northern Europe more people cycle when they children and when they are late in life.
- The temporary LTN is likely to have led to increased journey distance and times for disabled people using Minicabs, taxis, Dial-a-Ride, Community Transport and SEN Transport. It is also likely to be causing increased journey time and distance for those care givers traveling to attend to the needs of sick and disabled residents within the Temporary LTN. Those who have a blue badge permit are also likely to have experienced increased journey times when trying to travel into or out of the Temporary LTN by car.

2.2 Please complete the table below to describe what the analysis, consultation, data collection and research that you have conducted indicates about the probable impact on customers or staff from various groups that share a protected characteristic.

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
Age	<p>Children and young people are the ones who's independent mobility has been curtailed the most by changes in the way streets are managed and used, and consequently are amongst those potentially benefitting the most from Low Traffic Neighbourhoods in terms of independent mobility and also enjoying the mental and physical health benefits of active travel, now and in later life when they take learned travel habits into the future.</p> <p>Just under a quarter of the population within the area of the proposed Experimental LTN are under the age of 18 and consequently do not drive. Young adults are less likely than older adults to have a driving licence or own a car. Hence these groups are expected to benefit from measures to assist travel by means other than the car.</p> <p>Walking is the most frequently used mode of transport including amongst those over 80. Frequency of travel as a car passenger and as a car driver is considerably lower than the frequency of walking trips. Frequency of travel as a car passenger remains fairly constant across the age ranges. Frequency of travel as a car driver peaks at the age 65-69 but declines rapidly by the age 80+ reflecting the rapid decline in driving licence holding over the age of 80+. The age range 65-69 is also when frequency of walking trips peaks.</p>	<p>The residents and business consultations on the future for the Temporary LTN failed to reach children and many young people.</p> <p>See left</p>	<p>See the various sources in section 1.</p> <p>Consultations</p> <p>Travel in London: Understanding our diverse communities 2019, TfL</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
Disability	<p>The most frequently used form of transport used by disabled people is walking. The frequency of cycling amongst disabled and non-disabled people are similar. Initiatives such as the proposed Experiment LTN intended to help people choose to walk and cycle are likely to benefit both disabled and non-disabled people</p> <p>Helping people to choose to travel actively is intended to help them stay healthy and to stay healthy for longer helping to prevent the development of disabilities including those that potentially arise from diabetes.</p> <p>Active travel helps to improve mental wellbeing as does reducing traffic in streets, in turn allowing greater community cohesion. Both can help tackle mental health problems.</p> <p>Increased space for cycling infrastructure helps to support the use of adapted and non-standard bikes and trikes.</p> <p>72% of disabled cyclists use their bike as a mobility aid, and 75% found cycling easier than walking. Measures to assist cycling, if implemented well will increase the independent mobility of disabled people who cycle.</p>	<p>The current Temporary LTN can result in longer journeys for disabled people using taxis, minicabs, dial-a-ride, SEN Transport Service vehicles and community transport minibuses</p> <p>Concern has been expressed at the increased journey time and distance incurred by some care givers attending residents with the Temporary LTN</p> <p>The current Temporary LTN has made it more difficult for some people reliant on the car to access the Auckland Surgery</p> <p>Drivers with Blue Badge permits living beyond the boundary of the LTN and needing to access people and places within the LTN may have increased journey time and distance.</p>	<p>Travel in London: Understanding our diverse communities 2019, TfL</p> <p>TfL Attitudes Towards Cycling</p> <p>Consultation response and other feedback</p> <p>'Assessing the needs and Experiences of Disabled Cyclists' Wheels for Wellbeing</p>
Gender	<p>Women travel more stages per day and walk more stages per day compared to men, although women travel and walk a shorter distance per stage compared to men. Men in a couple with children walk the fewest stages per day, particularly</p>	<p>Walking is the most frequently used mode of travel for both women and men. Men drive more frequently. Women more frequently travel as car passengers than men. The use of</p>	<p>Travel in London: Understanding our diverse communities 2019, TfL</p> <p>TfL's 'Attitudes Towards Walking:</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	<p>compared to single adult men. Women with children, either in a couple or single, walk more than those without children</p> <p>Women and men are expected to benefit from an improved walking environment but perhaps somewhat differently.</p> <p>More men currently cycle than do women. Consequently more men are likely to benefit from the proposed Experimental LTN</p> <p>Women are expected to be amongst those benefiting from the improved walking and cycling as they make more trips for escort education</p>	<p>cars by both men and women is likely to be affected by the proposed Experimental LTN. However, the majority of journeys made by car in London are short journeys. The proposed Experimental LTN is intended to help men and women to choose to travel actively rather than use the car for short trips, with the intention of benefiting the health of both</p> <p>Fewer women cycle than do men. However, the most common reason given by women for not cycling is fear of road danger. Creating quieter streets is intended to help women choose to cycle</p> <p>Women are more likely to escort school children to their educational establishments. Therefore it is women who are more likely to have to reconsider their travel behaviours.</p>	<p>Segmentation Study'</p> <p>TfL's 'Attitudes Towards Cycling' reports</p>
Race/ Ethnicity	<p>The frequency of walking trips is consistently high across all ethnic groups. However, walking at least once a week to</p> <ul style="list-style-type: none"> • get to work / school / college • visit friends and relatives • take a child to school <p>is considerably higher amongst members of BAME groups than amongst White Londoners</p>	<p>BAME Londoners are less likely than white Londoners to say that they feel safe from accidents when walking around London during the day. People from BAME groups may not feel as inclined to walk or cycle within the proposed Experimental. The effect on perceptions of Road Safety /Road danger amongst members of</p>	<p>Travel in London: Understanding our diverse communities 2019, TfL</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
		BAME groups should form part of the monitoring of the Experimental LTN	
Pregnancy and maternity	Pregnant women are not expected to benefit directly from the proposed Experimental LTN other than having a quieter street environment in which they can choose to take exercise close to home. However they are expected to benefit from the proposed installation of temporary 'parklets' incorporating seating in Auckland Road.		

2.3 Are there any gaps in information or evidence missing in the consultation, data collection or research that you currently have on the impact of the proposed change on different groups or communities that share a protected characteristic? If so, how will you address this?

Please read the corporate public consultation guidelines before you begin:
<http://intranet.croydon.net/finance/customerservices/customerserviceprogramme/stepbystepguide.asp>.

--

2.4 If you really cannot gather any useful information in time, then note its absence as a potential disadvantageous impact and describe the action you will take to gather it.

Please complete the table below to set out how will you gather the missing evidence and make an informed decision. Insert new rows as required.

Group's with a "Protected characteristic" and broader community issues	Missing information and description of potential disadvantageous impact	Proposed action to gather information

A criticism levelled at the Temporary LTN is that it has caused a worsening of air quality experienced disproportionately by members of the BAME groups	There is no hard/clear evidence with which to support or counteract this criticism	The monitoring of the Experimental LTN should be designed to seek to try and answer this question or at least provide a deeper and clearer insight
Transport for All has levelled a general criticism at the LTNs implemented across London re engagement with disabled people	Transport for All is suggesting that not enough is known about the effects and potential effects on people with disabilities	Transport for All and members of the Croydon Mobility Forum to be engaged with in the development of the engagement and monitoring strategies for the Experimental LTN.
The residents and business consultations on the future for the Temporary LTN failed to reach children and many young people.	Lack of knowledge regarding the experiences of children and young people	The engagement strategy and monitoring strategy for the proposed Experimental LTN should be designed to reach and include children and young people.

Stage 3 Improvement plan

Actions to address any potential disadvantageous impact related to the proposed change

This stage focuses on describing in more detail the likely disadvantageous impact of the proposed change for specific groups that may share a protected characteristic and how you intend to address the probable risks that you have identified stages 1 and 2.

3.1 Please use the section below to define the steps you will take to minimise or mitigate any likely adverse impact of the proposed change on specific groups that may share a protected characteristic.

Equality Group (Protected Characteristic)	Potential disadvantage or negative impact e	Action required to address issue or minimise adverse impact	Action Owner	Date for completing action
Disability Since this preparation of this	Inaccessible street Environment	Transport for All lists the factors hindering disabled people engaging in active travel, the second of which is the condition of physical	Head of Highways and The Council's	When the lessening of the Pandemic and related

<p>Equality Analysis in December 2020, Transport for All has published its report 'Pave the Way' based on people with disabilities' experiences of LTNs. The opportunity has been taken to update this Analysis</p>		<p>infrastructure, such as uneven footways. Whilst the proposed experimental LTN is not expected to worsen the condition of footways etc, LTNs are perhaps opportune times and locations to make improvement to seek to maximise the opportunity for people with disabilities to engage in active travel. A street access audit should be undertaken to identify potential improvements such as footway repairs, installing dropped kerbs and reducing street clutter. The audit should be undertaken with members of the Mobility Forum when/as the lessening of the Pandemic allows.</p> <p>Resting spaces should be provided by placing temporary 'Parklets' incorporating seating at a few locations in Auckland Road and their use monitored</p> <p>Transport for All has raised concerns around the nature of consultation that has been undertaken in relation to LTNs across London. Further engagement and focussed research would be undertaken as part of /during the proposed Experimental LTN. The engagement strategy and monitoring strategy should be developed with the involvement of Transport for All and members of the Croydon Mobility Forum.</p> <p>Transport for All report that 15% of those participating in its research reported LTNs impacting on their ability to use taxis. It is not clear from the report whether 'taxis' includes Private Hire Vehicles / minicabs. The Taxicard</p>	<p>Access Officer</p> <p>Head of Transport</p> <p>Head of Highways</p>	<p>restrictions allow</p> <p>Before the operation of the Experimental LTN</p> <p>Before the operation of the Experimental LTN</p>
	<p>Participation in consultation</p> <p>Journey Times for Taxis and Dial-a-Ride</p>			

		<p>scheme uses minicabs as well as Taxis. TfL's research shows that people with disabilities make more journeys by minicab than taxis. However exempting buses and taxis from the proposed camera enforced 'No Motor Vehicle' would enable the same exemption to be applied to taxis and dial-a-ride vehicles etc as proposed at the Auckland Road bus gate.</p> <p>Transport for All report concerns about the increased journey time for people giving care. This is something also highlighted by the consultation into the future for the Temporary LTN and relayed at TMAC. Exemptions to the restrictions implementing the proposed experimental LTN should be provided for those giving care to residents within the LTN</p> <p>There is not a ready solution to the issue of potentially longer journeys by disabled people using minicabs. The Transport for All proposed scheme that would grant dispensation for disabled people requiring access to their home by any vehicle they choose, could be the solution but it is suggested that this needs to be developed across London with TfL perhaps facilitated by London Council's</p> <p>Half the participants in the Transport for All research had a blue badge parking permit. Access to the proposed Blue Badge parking bays serving the Auckland Surgery could be further improved by allowing blue badge permit holders to</p>	<p>Head of Transport</p> <p>The Council's Access Officer,</p> <p>TfL and potentially London Council's</p> <p>Head of Highways</p>	<p>As soon as possible if achievable. Dialogue to start with TfL, London Councils and Transport for All in March 2021.</p> <p>Before the operation of the Experimental LTN</p>
--	--	--	---	--

		apply for an exemption permit similar to the scheme where blue badge holders are able to apply for a 100% discount for the Congestion Charge for up to two vehicles they register with TfL.		
Age				
Gender				
BME				

3.2 How will you ensure that the above actions are integrated into relevant annual department or team service plans and the improvements are monitored?

They will be reported on when reporting the results of and review of the Experimental LTN

3.3 How will you share information on the findings of the equality analysis with customers, staff and other stakeholders?

The results will be published as part of reporting to the Traffic Management Advisory Committee (TMAC) including when reporting the results of and review of the Experimental LTN and making any decision on the future of the Experimental LTN.

Section 4 Decision on the proposed change

4.1 Based on the information in sections 1-3 of the equality analysis, what decision are you going to take?

Decision	Definition	Yes / No
We will not make any major amendments to the proposed change because it already includes all appropriate actions.	Our assessment shows that there is no potential for discrimination, harassment or victimisation and that our proposed change already includes all appropriate actions to advance equality and foster good relations between groups.	No
We will adjust the proposed change.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change. We are going to take action to make sure these opportunities are realised.	Yes
We will continue with the proposed change as planned because it will be within the law.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change.	No

	However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned.	
We will stop the proposed change.	The proposed change would have adverse effects on one or more protected groups that are not justified and cannot be lessened. It would lead to unlawful discrimination and must not go ahead.	No

4.2	Does this equality analysis have to be considered at a scheduled meeting? If so, please give the name and date of the meeting.
------------	--

TMAC 15th February 2021

4.3	When and where will this equality analysis be published? An equality analysis should be published alongside the policy or decision it is part of. As well as this, the equality assessment could be made available externally at various points of delivering the change. This will often mean publishing your equality analysis before the change is finalised, thereby enabling people to engage with you on your findings.
------------	---

It will be published as an appendix to the report to TMAC on 15th February 2021

4.4	When will you update this equality analysis? Please state at what stage of your proposed change you will do this and when you expect this update to take place. If you are not planning to update this analysis, say why not
------------	--

The Analysis will be updated in stages when the access audit has been undertaken, when dialogue has happened with Transport for All and the Croydon Mobility Forum members and when the research into and monitoring of effects of the Experimental LTN is concluding and recommendations on the future for the Experimental LTN is being prepared.

4.5	Please seek formal sign of the decision from Director for this equality analysis? This confirms that the information in sections 1-4 of the equality analysis is accurate, Comprehensive and up-to-date.
------------	--

Officers that must approve this decision	Name and position	Date
Head of Service / Lead on equality analysis	Ian Plowright, Head of Transport	02/02/2021
Director	Steve Iles, Director of Public Realm	05/02/2021

Email this completed form to equalityandinclusion@croydon.gov.uk, together with an email trail showing that the director is satisfied with it.

Traffic Management Advisory Committee

Meeting held on Monday, 15 February 2021 at 6.30 pm.
This meeting was held remotely; to view the meeting, please click [here](#).

MINUTES

Present: Councillor Muhammad Ali (Vice-Chair);

Councillors Luke Clancy, Karen Jewitt, Michael Neal, Robert Canning and Paul Scott

PART A

7/20 **Minutes of the Previous Meeting**

The minutes of the meeting held on 12 January 2021 were agreed as an accurate record.

8/20 **Disclosure of Interests**

There were none.

9/20 **Urgent Business (if any)**

In response to questions, the Chair stated that the appointment of Members to Committees was a Group matter and urged that any queries in relation to the matter should be referred to the relevant Group Whip.

10/20 **Crystal Palace and South Norwood Low Traffic Neighbourhood Addendum Report**

The Committee considered the [Report](#), presented by Steve Iles, Director of Public Realm, which comprised of an addendum to the January 2021 Report requested by the Cabinet Member for Sustainable Croydon. The Addendum advised on the continuing soundness of the recommendations made to Traffic Management Advisory Committee (TMAC) in the January 2021 Report in the light of the judgment in R (UTAG & LTDA) v Mayor of London and Transport for London (TfL) [2021]. The Addendum additionally considered the revision to the Equality Analysis since the publication of the 'Pave the Way' report; the access of taxis and buses to the South Norwood and Crystal Palace Low Traffic neighbourhood (LTN); and a Greater London Authority (GLA) and TfL commissioned study into the air quality improvement effects of implementing the Mayor's air quality related policies. This Addendum recommended increasing the categories of vehicle to which Automatic Number Plate Recognition (ANPR) camera technology exempted and asked the committee

to endorse the proposed 12 month experimental orders.

The Chair explained that the meeting was to consider the additional information contained within the Addendum Report. During the 12 January 2021 meeting of TMAC, Committee Members listened and considered the views of those who registered to publically address the advisory Committee. This procedure was in line with the Protocol for Participation in Meetings of the TMAC which was contained in [Part 5H of the Constitution](#).

Questions from the Committee to Officers

Councillor Luke Clancy asked if LTNs should instead be introduced after the result of the TfL appeal to the high court ruling was available. He secondly asked what the timetable would be if the recommendations were implemented as set out. The Director of Public Realm firstly replied that the reasoning of the introduction of provisions was clear in the January 2021 Report and officers agreed with the recent adjustments which allowed for taxis, care workers and those who need access to the LTN. The Director of Public Realm secondly replied that the timeline was subject to the decision, following the statutory process of issuing a notice to neighbouring boroughs as set out in 121B of the Road Traffic Management Act (1998). This would provide one month for any concerns to be raised and reviewed. After the one month notice period, the notice would be referred to the GLA as the adjudicator in the statutory process.

In response to Councillor Luke Clancy asking whether dispensations were planned for those with disabilities without a Blue Badge, the Director of Public Realm stated that people who believed they met the criteria to hold a Blue Badge should seek that provision. Councillor Luke Clancy stated the report detailed the opinion that the monitoring of the experimental LTN should be designed to determine if the worsening of air quality would disproportionately affect BAME groups. He asked how this would be achieved and what baseline data would be used. The Director of Public Realm replied that the January 2021 Report described the roll out of monitoring methods to gather data using a number of sources, also noting there was a wealth of data across London available. The challenge at this time were the implications of Covid which informed the decision to introduce experimental orders to gather data over a longer period of 12 months.

In relation to the categories the ANPR would not apply to, Councillor Karen Jewitt asked how tracking would work in instances where a permitted vehicle had to use a different vehicle, with a different number plate, due to unforeseen circumstances. The Director of Public Realm responded that this process would be advised and was not yet fully defined. There would be an exemption list and users would be notified on how to make amendments to that list. Croydon Council would use learning from other London boroughs and seek best practice as this process would not be unique to Croydon LTNs.

Councillor Michael Neal asked if there would be a first time warning for those entering a restricted zone. He secondly asked what dialogue the council had

with Bromley Council since the 12 January meeting of TMAC. The Director of Public Realm firstly stated that there would be a warning and proper signage, compliant with traffic regulations, to communicate entering the restricted zone. Secondly, he stated that conversations were open with Bromley Council since the last meeting; they were aware of the Addendum and they had provided a letter to the TMAC with their position remaining the same. The Director of Public Realm told the Committee that both the original Report and the Addendum were working to achieve a medium of driving forward with healthy streets whilst recognising the challenges by liaising with residents and neighbouring boroughs.

Councillor Robert Canning stated that the extended list of exempt ANPR categories was an improvement, however there were still gaps and unknowns to rules relating to other services. There were services such as Veolia, supermarket delivery vans and take away food deliveries which were important to residents. The Director of Public Realm replied that Category G, 1.1 of the Recommendations, covered those bases and motor vehicle access to all properties would be maintained. There would be signage in place, more than the regulations required, to ensure proper communication and the council would continue to engage before the scheme was introduced.

Debate

Councillor Paul Scott made comments in relation to the scheme as a whole. He stated that people needed to change their lifestyle in the face of the climate crisis, which included how people travelled considering their carbon footprint. Pollution caused by vehicles in London, particularly the growth in usage in local neighbourhood streets, contributed to poor health outcomes and local streets should be a place for communities. The further updates to the report relating to schools and drivers with disabilities was a valuable additional consideration to the plans. Councillor Paul Scott stated he had received powerful emails in support of LTNs from residents. He stated that this was the beginning of the rollout of protection measures and clearly reasoned arguments were detailed in the Report. To achieve positive mental and physical health outcomes for residents, there should be more LTNs implemented to make more neighbourhoods safer and cleaner to use.

Councillor Luke Clancy stated that he could not support the recommendations as the scheme risked exacerbating inequalities by creating exclusive and desirable areas to live in the style of a private estates, therefore the scheme created winners and losers. He explained that he received many emails urging the council to urgently open roads. These including reasons relating to: residents being unable to travel to work, nurses who were unable to risk using public transport for their clients, residents in Bromley complaining of displaced traffic and associated problems, delivery drivers being held up and residents with asthma looking to sell their property due to increased and unbearable fumes. He stated that the Cabinet Member should respect the outcome of the original consultation and remove the entire scheme.

Councillor Robert Canning stated that he agreed with the case for driving

policies towards positive environmental change and noted the improvements in the recommendations seen in the Addendum. There were still areas of uncertainty about the scheme in practice, however the worst outcome in the given situation was to implement nothing. Experimental schemes should be encouraged because the success of the scheme would be considered in a future TMAC. To ensure robust data would be considered at that stage, it was critical for a robust monitoring system to be in place to measure the air quality in the LTN and surrounding areas because displacement of traffic and pollution was a key factor.

Councillor Michael Neal stated he felt there had not been sufficient dialogue with the local schools, whose staff and visitors would be considerably effected by the scheme. Despite the further amendments, the schools were still opposed and requested further dialogue. The statement from Harris Academy asked if there were other methods of achieving calmer traffic in the area other than a LTN. Bromley Council were also still opposed and Councillor Michael Neal stated that the council should continue dialogue and find a cross-borough solution. It should be noted Sutton Council removed their LTN following the high court ruling and Lewisham Council halted their scheme following opposition. Croydon Council should listen to its schools and business owners as this option was clearly wrong for many stakeholders, which was demonstrated by the emails received by Member. He hoped the council would reconsider the scheme, consult on the proposals properly and following that rightly remove the scheme entirely.

Recommendations

Councillors Michael Neal and Luke Clancy stated that they did not endorse the recommendations made to the Cabinet Member for Sustainable Croydon.

Councillors Robert Canning, Karen Jewitt and Paul Scott endorsed the recommendations made to the Cabinet Member for Sustainable Croydon.

Recommendations outlined in the report:

The recommendations made to the Traffic Management Advisory Committee in the January 2021 Report are maintained subject to the following changes:

1. Having considered the revised Equality Analysis, the Traffic Management Advisory Committee recommend to the Cabinet Member for Sustainable Croydon that:
 - 1.1 The categories of vehicle to which Automatic Number Plate Recognition (ANPR) camera technology (Recommendation 1.3.1 in the January 2021 Report), shall not apply is extended to include:
 - a) a vehicle being used for fire brigade, ambulance or police purposes;
 - b) anything done with the permission of a police constable in uniform or a civil enforcement officer;

- c) a vehicle being used for the purposes of a statutory undertaker in an emergency, such as the loss of supplies of gas, electricity or Page 4 water to premises in the area, which necessitates the bringing of vehicles into a section of road to which the order applies;
- d) buses;
- e) licensed taxis
- f) Dial-a-Ride vehicles;
- g) vehicles to which a valid exemption permit has been provided.

for the reasons set out in this report and summarised at paragraph 3.12 and 15.3 of the January 2021 Report.

1.2 The Cabinet Member consider the revised Equality Analysis when making their decision in relation to recommendations 1.1 and 1.3 -1.7 in the January 2021 Report.

11/20 **Exclusion of the Press and Public**

This item was not required.

The meeting ended at 7.18 pm

Signed:

Date:

.....
.....

This page is intentionally left blank



Page 733

OUR
**CORPORATE
PLAN FOR
CROYDON**
2018 - 2022





Contents

4

Foreword: Leader of the Council

5

Introduction: Chief Executive

6

Key statistics

8

Impact of austerity

9

Case study: Food Poverty Action Plan, Community Connect and Food Stop

10

People live long, healthy, happy and independent lives

12

Our children and young people thrive and reach their full potential

14

Good, decent homes, affordable to all

16

Everyone feels safer in their street, neighbourhood and home

18

A cleaner and more sustainable environment

20

Everybody has the opportunity to work and build their career

22

Business moves here and invests, our existing businesses grow

24

An excellent transport network that is safe, reliable and accessible to all

26

We value the arts, culture, sports and activities

28

Our council

Foreword: Leader of the Council

Croydon with a population approaching 400,000 is a city in all but name, a borough made up of many wonderful places, from South Norwood to Purley, from New Addington to Crystal Palace, from Addiscombe to Coulsdon, and so many more.



With 93,000 young people we are proud to be London's youngest borough and proud to be a place where we celebrate our diversity; we celebrate our successes, and in tough times we stand together as one community.

Our manifesto, which we were elected to deliver in May 2018 was clear; we will work hard to ensure everyone has the opportunity to benefit from the economic investment coming to our town. We will do all we can to ensure that nobody, and no community, is left behind. Culture will continue to be at the heart of our regeneration; Croydon's ongoing growth must be sustainable, and we will work with all partners and residents to ensure Croydon's infrastructure is fit for purpose, and fit for the twenty-first century.

I am proud to lead an administration that was elected with clear priorities for a safer, greener, economically prosperous and healthier Croydon. To achieve this we will build on the work of the last four years. We will continue to keep a tight grip on the council's budget, to ensure that even in economically tough times, we are delivering. We will deliver real affordable homes for local people,

as well as working towards becoming a London Living Wage town; we will increase borough wide recycling by at least 10%; invest more in our children's services; deliver services closer to local communities; continue to work closely with both the local NHS and police; devolve more budgets and decisions to local residents; open the new Fairfield Halls; and always listen to the changing needs and views of our local communities.

Our Corporate Plan outlines these key priorities and how they will be delivered to build community resilience, to continue to eradicate inequalities and to ensure that Croydon is a place where all have the opportunity to live, work and flourish.

This Corporate Plan gives emphasis to health, happiness, independence, prosperity, and reducing inequalities; as well as a continuation of our focus on safeguarding the most vulnerable Croydon residents, and driving improvements to our children's services. We will provide safe, clean streets whilst tackling some of the social challenges, such as violent crime and anti-social behaviour, which still exist.

Working together in partnership to create one shared purpose and one shared vision, we will work with the voluntary sector, public services, business community and community groups to deliver our outcomes, including:

- Build on our **'Choose Your Future'** campaign and, together, tackle the blight of knife crime;
- Be one of **London's greenest boroughs**;
- Work in partnership with the NHS to provide **good quality health services** for Croydon's population;
- Work towards providing **homes affordable for all**;
- **Abolish inequality** in Croydon and work towards a place where all have an equal opportunity to prosper.

On a national scale the outcome of Brexit negotiations remains unclear, and this uncertainty is extended to the public services which we all depend on. Local government has been hit particularly hard by austerity. Welfare reform has had a direct impact on many of our residents already, and this is likely to continue to have a negative impact on residents.

To address this the administration supports the council in its method to expand its holistic Gateway approach, which utilises prevention and early intervention and provides wraparound services.

This Corporate Plan sets out our priorities over the next four years (2018-2022), however we are clear that our work must remain aligned with changing times and changing needs. This document will be a living business plan that will be reviewed annually.

I look forward to continuing to work with all of you to create an even stronger, fairer borough with even greater shared prosperity.

Tony Newman
Leader of the Council

Introduction: Chief Executive

Delivering the services residents need in order to thrive in Croydon is a responsibility and a privilege. *How we do it demonstrates our values and shapes peoples' experiences of living and working in the borough.*



How we do it must be sustainable and able to respond to the different circumstances, concerns and aspirations of our residents and communities – both now and in the future.

But what does the future look like? Investment in Croydon will see tens of thousands of new homes and a population that is projected to rise from over 380,000 to 445,000 by 2031. Improvements to local infrastructure and cultural facilities will also support growth in the numbers of new jobs and businesses.

Nationally, public sector funding continues to decline and the impact of Brexit is unclear. Digital advances mean we can now access and analyse more data than ever before – using this information to make better decisions about our services. We also expect to connect with each other and access many council services easily online, 24 hours a day.

Demand for services, including many of our vital frontline services, continues to rise, in part due to the increase in population. Many of our most vulnerable residents' needs are becoming more complex at a time when support services are becoming more fragmented.

It is clear that we must radically change how we do things if we want to achieve the ambitions set out in this four year plan. We need to be an organisation that attracts individuals who are proud to serve the public and a place where talent can flourish. We are already working differently in some important areas and are learning from these successes.

When it comes to delivering effective public services we can see there is very rarely a one-size-fits-all solution. Instead we want to offer the right services or support, at the right time, and in the right place.

Of course, what works and is needed in New Addington, might not be what is needed or would work in Coulsdon. Croydon is made up of many places and we want to use local knowledge, insight and data to tailor and adapt our services. Responding to local needs in this way will let us tackle issues before they become larger problems.

Importantly we can't do this on our own. The Local Strategic Partnership shares our ambitions and has an important role to play in achieving all the outcomes set out here. But we also need to work with residents, other voluntary organisations

and businesses – pooling our resources and our skills to collaborate in new and creative ways.

This Corporate Plan sets out the priorities for the next four years; fundamental to the delivery of these priorities is getting the basics right for residents. We will continue to listen to residents and use their feedback to continually improve the services we deliver.

I want Croydon to be the council of first resort, not last resort – a council with the local relationships, insight and know-how to anticipate how we can make a difference and improve people's lives.

Jo Negrini
Chief Executive

Key statistics

POPULATION

Current total population

384,837

2nd highest in London



Growing to approx.

445,000 by 2031

14% increase between 2018 and 2031

0-17 years **94,775**

highest in London

18-64 years **238,678**

2nd highest in London

65+ years **51,384**

3rd highest in London

48.6%  Male

51.4%  Female

Data source: 2017 mid-year estimates
Office of National Statistics

DIVERSITY



51.7%

of Croydon residents are
**Black, Asian and Minority
Ethnic (BAME)**

Data source: 2018 GLA ethnic group projections



Over 100

languages spoken

82.6% of Croydon residents have
English as their main language



3,780

EU Nationals

registered for National Insurance
in Croydon in 2017/18

Data Source: DWP Stat Explore

HOUSING

58.8%

of residents own their
property (owner occupiers)

Data source: 2011 census



Average (median) house price

£362,000

Data source: 2017 Office of National Statistics



29.7%

are one person households



154,420

Properties across
the borough (2017)

ECONOMY



80.4%

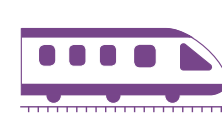
of Croydon residents
are economically active
(16-64 years)

Data source: December 2017 annual population survey

Home to over

14,000

businesses



12.5 million

tourism day visits to the borough

Data source: 2014-16 tourism survey

LIFE EXPECTANCY

Average life expectancy

Male  **80.3** years

Female  **83.6** years

Data source: 2014-16 Office of National Statistics

Variation of life expectancy across the borough (most deprived to least deprived areas)

Male  **9.2** years

Female  **6** years

EDUCATION



95.3%

of the adult population have a form of qualification

Data source: December 2017 annual population survey

 **93.7%**

of all primary school children received either their 1st or 2nd preference for a school place

 **78.6%**

of all secondary school children received either their 1st or 2nd preference for a school place


Data source: 2018 Department of Education

PARKS AND GREEN SPACES



Home to **120 parks** and green spaces

 **10** of which have been awarded green flags

 **32.7%**

of Croydon residents have access to woodland within 500 metres of where they live (highest in London)

Data source: 2015 Woodland Trust

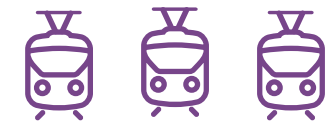
TRANSPORT



East Croydon station has over **26,000** passengers a day



3rd busiest interchange (on the Network Rail network)



29.5 million tram journeys are taken in Croydon annually

Impact of austerity

▶ Since 2010, and the start of austerity, funding for local government has been significantly reduced. Croydon Council has seen a 70% reduction in funding, totalling some £144m.

The government that took office after the 2015 general election has continued to follow a policy aimed at reducing public sector deficit, principally through reductions in public expenditure. One of the main areas to be cut has been local government.

As a result, councils have had significant reductions in government funding (made up of grants and retained business rates) and further reductions are expected over the medium term (Croydon's grant loss over the period is shown in graph 1 below).

As the graph shows, unless we change the way that we deliver our services, funding cuts will make it very difficult to continue in the same way.

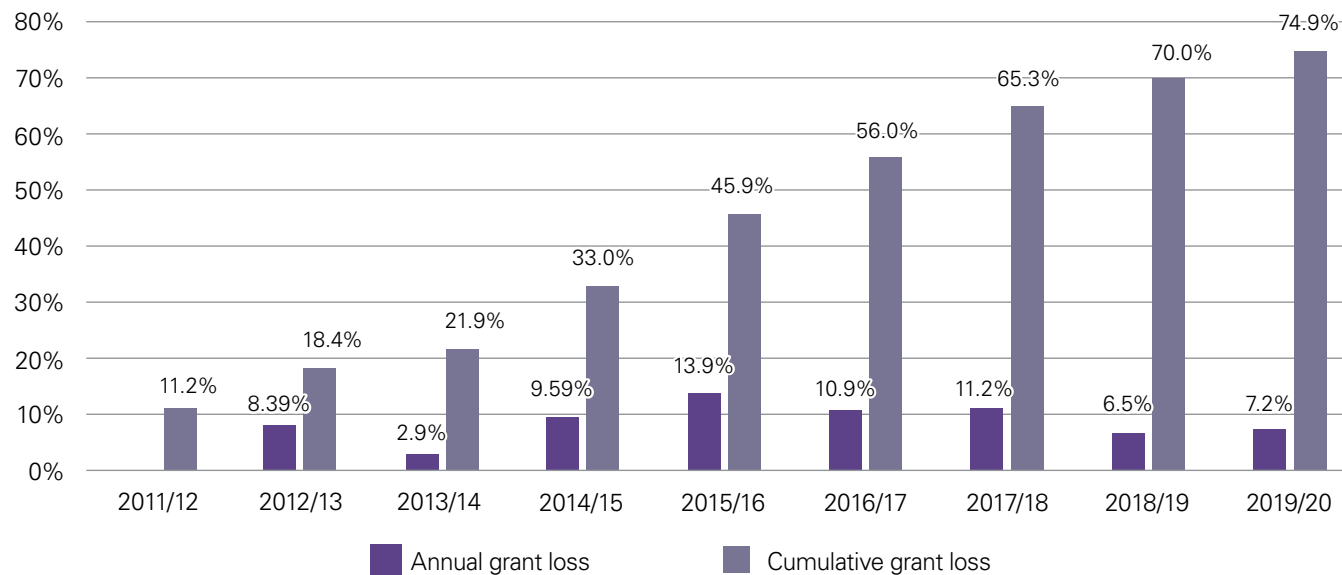
Our residents are under extreme financial pressures - finding methods to keep up to date with payments, following welfare reform and the roll out of Universal Credit, increasing costs, and the national impact of Brexit.

Service needs across the borough are becoming increasingly complex, and we continue to see an increase in the support needed around housing, employment, income maximisation, and health and wellbeing. This is in addition to the context of local government funding. We will therefore continue to implement a preventative approach across all service areas to mitigate the impact of welfare reform and reductions to Croydon's funding.

Page 740

We have seen, and continue to see the "effects of the ongoing revolution to governance and local government finance."

Institute of Fiscal Studies "A time of revolution? British local government finance in the 2010s"





Case study: Food Poverty Action Plan, Community Connect and Food Stop

▶ In Croydon we recognise that prevention and early intervention are key to ensuring that our residents have access to services before they are in need. In October 2017 Croydon’s Gateway service and public health team designed and commenced delivery of the Food Poverty Action Plan.

Croydon is one of a small number of London councils to date to successfully develop and implement a food poverty action plan, with many of our actions ranked by “Sustain” (an alliance for better food and farming) as leading the way in tackling food poverty.

Across the country there has been a huge rise in emergency food banks, and food poverty is a very real and growing issue for many of our residents. We have therefore committed to a whole systems and holistic approach to tackling the causes of food poverty to achieve the best outcomes for our residents.

We recognise that there are a number of attributable factors that can lead to food poverty and deprivation. To address these issues we have been working with a number of partners and local organisations to implement strategies to address financial concerns for our residents. This work is inclusive of a Homelessness Prevention Strategy, which is currently under review, and in addition, in 2017 Croydon Council worked in partnership with the family centre in Fieldway, New Addington, to launch the Food Stop.

The initiative, which is part of the council’s Gateway service, helps residents to reduce their weekly spend on food shopping at a time when finances are extremely tight, therefore helping to prevent a financial issue becoming a health or housing problem.

Located within the family centre, the Food Stop sits alongside the Community Connect services such as job club, health, well-being and benefits advice. We have also created a multi-agency “alliance” of 36 organisation from across the voluntary, community, public and private sectors working together to deliver positive outcomes for Croydon residents.

The Food Stop shop offers local people the opportunity to reduce their food shopping bill by paying £3.50 a week for around £15-£20 worth of grocery shopping; **helping residents to save an average of £550-£850 per year.**

For £3.50 a week members receive:

10 food items once a week, which can be selected from a wide range of products	Support, tips and advice on healthy eating on a budget	Opportunities to learn about healthy food	Health/ well-being offers, including free exercise class referrals	A holistic support package via the Community Connect project
--	--	---	--	--

Community Connect aims to improve financial resilience, employment and prevent homelessness for those most in need. As part of this programme, the Food Stop helps residents on a budget and encourages healthy eating habits.

Of the 111 households that initially signed up to the Food Stop, every household had debt with the council. Now, 103 no longer have any debt with the council and those with remaining debts are working with our Gateway service.

Overall, this programme has achieved just under £324,000 worth of cost avoidance savings to Croydon Council, which has allowed for other, similar projects to be funded, including plans to roll-out Community Connect and Food Stop to other parts of Croydon so that even more residents can benefit.

Impact of a preventative approach:

Community Connect and the Food Stop have produced a number of positive outcomes for the residents of New Addington and Fieldway:

▶ Over 100 residents are now members of the Food Stop	▶ Producing combined savings of £10,300 to their shopping bills	▶ The team have prevented homelessness by sustaining 43 tenancies	▶ Reduced rent debts and improved household finances among 43 families	▶ Supported 25 long-term unemployed residents into work	▶ With a further 22 undertaking training courses
---	---	---	--	---	--

► People live long, healthy, happy and independent lives

What does success look like?

- Croydon becomes a **more equal place**
- **Happy, healthy and independent lives** are lived by as many as possible, for as long as possible
- **Access to effective health services and care services** when needed

What we will do

- Invest in the voluntary and community sector to reduce inequality and increase the resilience of communities and individuals
- Expand the One Croydon Alliance from older people to the whole population where appropriate
- Revise Croydon's joint mental health strategy to prevent mental health problems and ensure early intervention
- Support the development of a culture of healthy living
- Improve and reduce differences in life expectancy between communities
- Build upon the support and assistance given to carers



▶ As our population grows it is essential to have the right levels of infrastructure in place to support those in need, as well as being able to prevent issues from becoming problems. This includes having high quality health and care provision, an environment that encourages and supports healthy living, and a clear ‘front door’ as a single point to access services.

One of our top priorities is to tackle inequality. We will work with our partners to identify instances of inequality and its causes and take preventative action where we see symptoms emerging. Locality working with partners and residents will be the key to reducing inequality. Genuine collaborative working across all our service areas will ensure that resources are directed to the right areas to secure meaningful and positive outcomes.

Our Gateway service is a powerful example of providing a holistic approach to building resilience in communities. As an organisation, and in partnership, we will seek to expand this approach and address the broader determinants of inequality. We will continue to improve access to housing and employment, reduce debt and the rate of child poverty, increase income, improve air quality and build upon our excellent leisure and parks facilities.

We have a clear commitment to increasing residents’ financial resilience and capacity to deal with difficult issues head on. This includes offering support, advice and guidance through our debt advice services, direct payments, Croydon Credit Union and our Gateway service. **Croydon’s Opportunity and Fairness Commission identified the importance of equality of access to education and the job market**, which is addressed in this plan under the sections detailing our commitments for children and young people and economic growth. Here we set out our commitment to providing equal opportunities for everyone to meet their potential.



We value our rich and vibrant culture, which contributes significantly to our success. By recognising and celebrating Croydon’s diverse population we are better placed to expose and tackle inequalities and, as a result, allow people to live the lives they wish happily, healthily and independently. **We will continue to invest in our valued and respected voluntary sector through the continuation of the Community Fund**, enabling us to expand capacity within the sector and work collaboratively to target resources and to make that difference in our neighbourhoods.

A stable home environment is crucial to staying healthy and independent. People’s circumstances change over time due to age, mobility and health, which in the past may have resulted in moving away from community and networks. Now, with suitable adaptations, such as shower seats and grab rails and the removal of trip hazards in the home, accessibility and independence can be maintained. Continuing this focus **we will keep pushing for all newly built properties to be ‘life-time’ homes**, while delivery schemes such as our Healthy Homes will help 700 households to keep warm while reducing fuel poverty.

To develop our prevention work further, we will promote our universal and targeted lifestyle advice and support through the JustBe website, NHS health checks, implement our Child Healthy Weight Action Plan and refocus sexual health services around prevention. By improving access to services such as Croydon Talking Therapies, substance misuse services and suicide prevention we will work with partners to prevent mental health problems, developing and ensuring early intervention for those living with mental ill health.

In addition to the above, we will **launch a fund to help address mental health issues for the under-25s**, continue our work to become a dementia friendly borough, implement the Carers’ Strategy 2020 and revise Croydon’s joint mental health strategy.

One of the most important developments in improving health outcomes has been the creation of the One Croydon Alliance, which has brought together partners, both statutory and non-statutory, from across the sector to deliver an integrated service. The first phase of the alliance’s programme has been to support over-65s, preventing them from going into hospital or making sure there are timely and appropriate services in place when discharged. This is a partnership programme which focusses on prevention and early intervention, so that people can live independent, healthier and more fulfilling lives.

Social isolation is a growing problem in today’s society; a problem which we will tackle through new methods of working. We will build confidence and resilience within our local communities and promote dignity and respect for older people and people living with physical and learning disabilities. Our work as part of the Croydon Safeguarding Adults Board will help to protect people from abuse and neglect. We will ensure that our care support contractors, as well as our own facilities, are working to **meet the highest standards of care**.

► Our children and young people thrive and reach their full potential

What does success look like?

- **Children and young people** in Croydon are safe, healthy and happy, and aspire to be the best they can be
- **Every child and young person** can access high quality education and youth facilities
- **Getting more young people involved** in taking part in local democracy and in tackling the issues that matter most to them

What we will do

- Grow our 'Choose Your Future' campaign to raise young people's aspirations and increase their opportunities
- Ensure there are high quality school places for Croydon's increasing numbers of children and young people
- Continue to invest in and improve services for children and young people in need of help and protection
- Champion the interests of children and young people in our care and support care leavers into successful young adulthood
- Support and implement the priorities of our Youth Mayor and Deputy and launch an annual youth festival



► We have nearly 100,000 young people in Croydon and we as a council, along with our partners, residents and communities have a shared responsibility to give them the best possible start in life. All our major partners such as police, health services, voluntary organisations, local colleges and faith groups are signed up to making young people a key priority. We will build on this commitment by **sharing our resources, expertise and intelligence more effectively to better safeguard children and young people and improve their outcomes.**

Working with our partners to build on the success of our ‘Choose Your Future’ campaign, we will support young people to make positive decisions; offering opportunities including access to skills training, education, volunteering, apprenticeships, and business and employment advice. From 2019 the new Onside Legacy Youth Zone will support this work, in addition to our partnerships with local employers, public services, and voluntary and community organisations.

Raising school standards and delivering the UK’s largest school building programme will meet the needs of our growing young population. We will work towards improving the attainment levels for young people of white working class and Black Caribbean heritages, those in receipt of free school meals and looked after children, particularly at key stage 2. Our aspirations are high for our children and young people with special educational needs and/or disabilities, and we will continue to support them to achieve independence and employment.

In 2017 we had a disappointing Ofsted judgement of our children’s social care services. We continue to work extremely hard to improve the services we are responsible for, supported by our partners,



and will deliver our ambitious improvement programme. We are determined to ensure more children and families receive the right support, at the right time, and that those children and young people who need it, benefit from high quality social work which improves their lives. **We will recruit and retain talented staff who want to work in Croydon; who share our ambitions for our children and young people; and challenge staff to deliver core services brilliantly, every single day.**

We know that it is not enough simply to help children and young people when they need us; we must work differently with our families and communities in order that our young people feel safe and lead happy, healthy independent lives, wherever possible. By bringing services closer to children and families who need them, building alliances across partners and providers in localities, we will intervene at an earlier stage and address issues before they become problems. **The first step will be to deliver a joint approach to early help and family support alongside schools, health services, the police and voluntary organisations, to build resilience, and ensure more children and young people are safe.**

With our determination, we will be the best corporate parent to Croydon’s children and young people in care, supporting them

through into successful young adulthood; as any parent does. This will involve listening to their worries and their ambitions and championing their interests. Our work to support unaccompanied asylum-seeking children has been recognised by UNICEF, the Department for Education, and the Ministry for Communities, Housing and Local Government. We have been successful in obtaining additional funding to work more closely with young people and their foster carers, to identify and reduce risks such as exploitation and modern slavery, and to overcome cultural and language barriers, and promote integration into UK life.

We recognise that some young people will need extra support, however we also know that all of our young people have a vital role to play in making Croydon a better place. **We will ensure children and young people have a greater voice and influence by creating more opportunities to hear from them,** and empowering them to make positive changes in their communities. An annual youth congress, and a youth festival will aid young people in developing their own priorities, in addition to the leadership of the Youth Mayor.

► Good, decent homes, affordable to all

What does success look like?

- **New homes** are built for all needs, including genuinely affordable homes
- **Quality homes** – more existing homes are decent and meet people's needs
- **Homes for everyone** – all have the opportunity to access a suitable home and avoid homelessness, with no one forced to sleep on the streets
- **Standards are improved** in the private rented sector

What we will do

- Build 2,000 homes that give priority to Croydon residents
- Return at least 100 vacant properties back into use
- Renew the landlord licensing scheme beyond 2020 and increase the number of properties registered
- Purchase 250 street properties for families in need with truly affordable rent and security of tenure
- Develop our Homelessness Prevention Strategy and assist and enable our residents to secure accommodation, supporting vulnerable residents to increase resilience and independence
- Work with the Mayor of London to ensure affordable housing in new developments



► **Croydon is growing quickly and our population will soon exceed 400,000. In 2017 alone approximately 5,000 properties were built in the area around East Croydon Rail Station. An increasing population means that residents’ financial means and housing needs are varied. We know that there is no one answer to housing issues and our residents require the right support at the right time.**

We acknowledge that there are notable links between lack of financial resilience and homelessness, and will develop and implement a Homelessness Prevention Strategy that reflects this.

The council’s Gateway service aims to improve outcomes for our residents and reduce the demand on our services by changing the way we work across the council, with our partners and residents. Working in a holistic, preventative way in response to whole family needs, this approach provides sustainable outcomes and household independence through an aligned focus on residents financial, employment/training, and housing needs. This rounded approach enables the use of single assessments for families who interact with the service. It empowers and supports families and individuals in achieving sustainable outcomes.

We are committed to ensuring equal and fair access to housing, providing support in accordance with need. **We will support the development of a mutual bank or building society to help residents’ access suitable homes, including through loans for deposits.** Croydon Healthy Homes scheme will help 700 households manage fuel costs and energy efficiency measures, reducing fuel poverty and improving their health.

We are committed to providing homes that are affordable, safe and of good quality – in sustainable communities. We support the development of homes that meet the changing needs of residents

throughout their lifetimes. Our Local Plan aligns with this, requiring that 10% of completed homes are wheelchair accessible. As an organisation we will work with the Mayor of London and housing providers, including Brick by Brick, our own housing development company, to ensure all play their part in responding to this housing challenge. **We will prioritise Croydon residents in our schemes and deliver many more affordable properties.**

We will buy 250 homes for letting to families in housing need, at genuinely affordable rents, with security of tenure. In addition, we will support other options for bringing forward new homes; including through community land trusts, cooperative housing and using modular and prefabricated construction, as well as working with property owners to bring empty homes back into use.

Through our landlord licensing scheme we will work with both landlords and tenants to raise standards in the private rented sector, ensuring that people are treated fairly. Investing in all our

council homes will ensure they meet the decent home standard and, **we will agree a set of standards with lettings agents and landlords including access for benefit recipients and families.** Our social lettings agency will assist in finding suitable and affordable homes, providing support to sustain tenancies when needed; and our Housing First offer will give rapid access to a settled home with mobile support for some of the most vulnerable rough sleepers. We will also introduce a borough-wide Article 4 direction on houses in multiple occupation (HMOs).

Housing provision impacts neighbourhoods, whether that is increasing demand for school places and parking, or the need for good local transport and open spaces to use. As we look at our housing needs we are also looking at the needs of communities. That is why we are working with partners such as the NHS, to ensure we consider not only people having a home but also a doctor they can go to in their own neighbourhood. **This is about ensuring decent, affordable homes for all that are also in great neighbourhoods.**



► Everyone feels safer in their street, neighbourhood and home

What does success look like?

- **Working in partnership to reduce crime;** including serious youth violence, domestic and sexual violence, and hate crime
- **Anti-social behaviour** is reduced throughout the borough, through work with partners and local community involvement
- **Public protection** to ensure that residents and visitors are safe and that businesses are operating effectively to minimise risks

What we will do

- Work in partnership to develop a public health approach to tackling serious youth violence and knife crime
- Further develop services that support survivors of domestic and sexual violence, and disrupt the most prolific offenders
- Work with communities, businesses, police and other agencies to tackle crime and anti-social behaviour across the borough
- Deliver our Prevent Strategy to reduce radicalisation, extremism and hate crime
- Upgrade our CCTV infrastructure and ensure the control room is operating effectively to reduce crime and protect the public
- Ensure that licensing and regulation systems are effective and reduce the risk of harm to the public



► **Croydon is a diverse, friendly and vibrant borough full of people living busy lives and helping to create supportive communities. We want to ensure that people from all of our communities feel safe.**

Croydon's Local Strategic Partnership has been clear that children and young people are a top priority for Croydon. We have a genuine commitment to make Croydon the safest London borough for young people, and many organisations and individuals across the voluntary and public sectors, are working hard to eliminate serious youth violence. Our preventative and community-oriented approach towards tackling serious youth violence is gaining recognition across a number of our key stakeholders including, London Councils, the Greater London Authority (GLA), the Metropolitan Police Service, and the Mayor's Office for Policing and Crime (MOPAC). We believe treating youth violence as a public health issue is the best way to make a difference. A public health approach means developing an evidence-led, preventative and long-term approach.

Expanding our Youth Community Fund will support voluntary organisations providing diversionary activities and supporting young people to pursue new opportunities. We will also establish a fund to tackle mental health issues for under 25s. Key to improving youth safety is our work towards reducing the number of young people who enter the youth justice system. We will establish a borough-wide mentoring scheme and work with business to increase the number of apprenticeships. Establishing a 'safe haven' scheme across our local high streets will help make the borough a safer place for all.

We will work with our partners in the police, statutory agencies, business and the voluntary and community sector to implement Croydon's Community Safety Strategy. This strategy aims to reduce the overall crime rate in Croydon by focusing on violent crime and domestic abuse, improving the safety of children and young people, and tackling anti-social behaviour and environmental crime.

In addition, we will continue to improve how we challenge and respond to hate crime and extremism; working with communities and partners to understand its impact and improve public confidence.

Community safety is not just about reducing crime, it's also about feeling safe. Continuing our work with the London Fire Brigade, we will ensure all homes meet the required safety standards. Following the investment into our street lighting, we will ensure appropriate contract management so that people feel safe in all parts of Croydon at any time, day or night. Two-thirds of people living with dementia in Croydon live in the community and we can all help to keep them safe and supported. **In 2019, Croydon will become a dementia friendly borough**, educating communities across generations on the support that can be given to residents impacted by dementia, including families and carers.

Concerns over road safety are not unique to Croydon, but we have highlighted it as a key area for improvement. **Evidence has shown that casualty reductions and serious road traffic collisions are reduced greatly by lowering the speed limit to 20mph.** Our borough-wide 20mph limit, which has links to improving air quality, will enable people in Croydon to walk, cycle and drive around the borough more safely.

We will support multi-agency operations through better coordination, upgraded CCTV and improved gathering and sharing of intelligence with partners. Our focus on addressing domestic and sexual abuse will continue, supporting victims through our multi-agency Family Justice Centre, delivering multi-agency training, establishing work-placed ambassadors and supporting other organisations to do the same. Raising awareness and confidence in dealing with domestic abuse within the community through training, community events and domestic violence champions, will be key.

We support the White Ribbon commitment to end male violence against women and will disrupt the most prolific offenders through the MOPAC funded Drive project, and safe relationships programme. Amongst our top priorities are to continue to tackle female genital mutilation, forced marriage and so-called honour-based violence; and to fight modern day slavery and child sexual offences.



Using the full range of powers available to us, we will prevent anti-social behaviour. By growing the numbers of our neighbourhood safety officers by 50%, our uniformed presence will increase. **Working with communities, local business, police and agencies we will tackle crime and anti-social behaviour across the borough**, as well as implementing action plans for specific hotspots. Our Safer Streets programme targets street drinking providing access to support and treatment, as well as enforcement.

The resources needed to address safety issues means we must bid for available funding and continue to advocate for more. Not only do we need funding for specific services, we also need to ensure our voluntary sector is robust. Moreover, **campaigning for adequate police resources for Croydon will ensure our partnership remains effective as the Metropolitan Police tri-borough framework is implemented.** When we can address concerns within localities through proper engagement and preventative methods we can be more successful. Focusing on prevention, we will tackle issues before they become problems - this work will take us closer to where people live and will increase their confidence in those areas.

► A cleaner and more sustainable environment

What does success look like?

- **Increase education and information** to improve individual responsibility for waste, and to encourage reports of fly-tipping
- **Improved air quality**, especially at or near schools
- **Croydon's recycling rate** is increased and the use of plastics is reduced

What we will do

- A sustained education piece to increase individual responsibility for waste reports of fly-tipping
- Implement intelligence-led interventions to continue to take tough action on those who litter and fly-tip
- Delivery of our Air Quality Action Plan to tackle idling vehicles, in particular around schools, and plant 3,500 new trees by 2023 in streets and open spaces
- Increase our recycling rate to over 50% with a more effective waste collection service



► Residents tell us that clean, accessible streets are a priority – important for their wellbeing and the success of the local economy. The ‘Don’t Mess With Croydon, Take Pride’ campaign sets out our ambitions and expectations in this area. It demonstrates that where we need to take action we will do so, evidenced by 200 successful prosecutions for fly-tipping to date.

We have necessary and strong enforcement procedures, supported by good relationships with business improvement districts, who help us make Croydon cleaner and greener. We know that residents and businesses have to be our partners in tackling these issues. Over the next four years we will focus on strengthening those relationships further, particularly in how we deal with waste.

We will encourage greater community ownership and involvement through our Street Champions and community clean-ups; improving reporting of fly-tipping and litter with the new Don’t Mess With Croydon app and increased use of social media. Our work with key influencers, schools and landlords will continue. We have already engaged with 50 schools to provide education to children and young people on the importance of recycling, with the aim of increasing awareness in our communities. In addition, we will expand time-banded waste collection from premises within high streets, including commercial properties. We know that we need to provide access to sufficient recycling facilities and will continue to implement more dual use recycling bins.

We understand the importance of how our streets look and feel, so have **introduced a contract that requires streets to be maintained to a high standard at all times.** We will place real emphasis on getting the waste and street cleansing contract right so that we can set out our expectations of others. Taking tough action on those who are not willing to do their part remains imperative and to achieve this we intend to increase the number of enforcement officers. Quick removal of fly-tips is imperative and we will continue to raise the profile of a clean borough through our campaigning.



The work we do to address air quality must go further. We will plant 3,500 new trees on streets and in areas of high air pollution; continue to promote and enable community renewable energy schemes; and work to achieve 100% clean energy across the full range of council functions by 2050. We will tackle idle vehicles, focussing on hot spots including taxi ranks, buses on stands and schools. In addition, we will explore the **further introduction of pedestrian zones around schools, which will help improve air quality** and reduce traffic congestion. We will also equip our education providers with air quality monitoring systems. We know that encouraging more journeys by walking and cycling will have an additional improved impact on the health and wellbeing of our residents.

Our ambition is to exceed 50% recycling as a borough within two years. Not only will this bring positive benefits in terms of landfill savings, but is essential for a sustainable environment. That is why we will also work to make major reductions in our use of plastics and will call upon, and influence, all local businesses to do their part. The collection service change is expected to yield in excess of 50% recycling, however there will be further work to do in lobbying government to make centralised changes.



► Everybody has the opportunity to work and build their career

What does success look like?

- **More businesses** pay the London Living Wage, employ local and buy local
- **More residents and businesses** benefit from the regeneration and investment being made in Croydon
- **More residents** can develop their skills through apprenticeships, academic and technical courses

What we will do

- Create the environment for thousands of new job opportunities to be made available to local people
- Increase apprenticeships and learning opportunities for all of our residents, particularly young people, the homeless, care leavers and people living with a disability or long-term condition
- Support vocational routes into our growth sectors of care, culture, retail, technology and construction through Croydon Works, our job brokerage service
- Work towards establishing a university campus in Croydon
- Develop a childcare loan scheme to allow more people to access work



► **Croydon has high levels of employment and, as investment continues, it brings with it new and exciting opportunities.**

Investment into Croydon town centre is expected to generate around 7,000 jobs. We know that areas right across the borough are developing, growing and thriving and we need to ensure people have the skills and knowledge to access these opportunities.

Work with partners, and our own data, tells us that there are real challenges for some people entering and staying in the job market. We see this information at a very local level and can make effective changes on a local basis that will make a real difference for our communities and neighbourhoods.

We need to match the investment into Croydon with our commitment to giving people the opportunity to access work; whether that is through training, advice or additional support. We will work with schools, colleges, trainers and businesses, to **support vocational routes into the growth sectors of care, culture, retail, technology and construction through our job brokerage service, Croydon Works.** The council's partnership with Coast to Capital will assist with achieving a university campus, which will aid in improving our economy.

We will develop a childcare deposit loan scheme to support parents to have the opportunity to work. **Croydon is passionate about being the best parent it can, supporting children and young people in our care into successful young adulthood; as any parent does.** With this in mind we will make care leavers a priority, supporting them into education, training or work.

We will create opportunities to increase equality of access to work for under-represented groups. To do this, and enhance our existing programmes, we will work with our partners, local businesses and communities.

The sizeable investment into Croydon is an exciting opportunity for the whole borough. That is why we are committed to the Good Employer Charter, which encourages local businesses



to buy Croydon, employ Croydon and be better for Croydon. It guarantees fair pay for the employees of participating businesses – this means paying or working towards the London Living Wage. The Good Employer Charter also seeks to address inequality in the job market; ensuring that equality and inclusion are embraced and embedded within all employment sectors across the borough, particularly where employers are signed up to or aiming to sign up to the charter.

As Croydon town centre is developed we are committed to seeing commercial and retail businesses paying the London Living Wage.

We will work in partnership with employers to offer more apprenticeships and ensure a recruitment process that makes jobs available to a wide range of potential employees. **The benefits of the regeneration in the town centre will be felt in all of our local high streets, providing opportunities for everyone.**

Supporting people into employment, education or training is key to a successful borough. It will positively influence how people feel, and further, how they engage with their communities and neighbourhoods.

► Business moves here and invests, our existing businesses grow

What does success look like?

- **Transport, digital and social infrastructures** are effective and support economic growth
- **Small and medium enterprises and entrepreneurs** thrive in an open and supportive environment
- **Local communities and high streets** benefit from economic growth and flourish

What we will do

- Promote 'Croydon is Open' to realise more investment into Croydon
- Deliver the new town centre with new retail, jobs and homes
- Ensure excellent broadband is available to Croydon businesses
- Develop plans relevant to every local high street along with our business improvement district partners
- Increase the number of businesses in the borough and support existing business for sustainable economic growth



► Croydon has a thriving business sector, with many established organisations choosing to set up their headquarters here. This includes a quickly expanding technology sector and large number of start-up businesses. The potential for us to build on our economy is vast and will have many benefits for the growing population. Our priority is to ensure that this growth benefits everyone and that no one is left behind.

Croydon is open for business, inclusive and supportive of all residents and communities, this is demonstrated by our campaign strapline ‘Croydon is open’. As part of this, we will hold investor events and work with our partners, particularly the business improvement districts (BIDs), Chamber of Commerce and small and medium-sized enterprises (SME) networks, **to create opportunities for international trade.**

The redevelopment of Croydon town centre will be a major focus over the next four years. **It will provide new jobs, homes and investment into the heart of Croydon.** Two of our key priorities will be to ensure the town centre keeps running through the redevelopment work, in addition to completing the 46 infrastructure projects that will enable the growth to happen.

We know that our work to keep Croydon clean and safe is dependent on building solid relationships with all local businesses. We are proud to promote the success of our local economy. We will support strong local BIDs; where businesses can align to each other, to enhance their local environment and **champion collective needs.**

It is important that we provide the best possible environment for businesses to sustain themselves and to further develop and grow. To support this, we want a **major improvement in broadband provision across the borough.** Development of the evening and night time economy is also crucial. Beyond the town centre, we want to have local economic development plans, as well as new



small business hubs. Small and medium-sized enterprises (SME) are the primary creators of new jobs; we will therefore establish a single SME support service and encourage small businesses to bid for our contracts. Our ask of larger contractors will be to sub-contract with local suppliers where possible.

We know that some areas of the borough have higher turn-over rates for businesses than others. Taking into account the local, national and international context, the impacts of changes can be seen across the borough, inclusive of the impending Brexit. We will

use this insight to make better decisions and intervene at the right time, in the right way, to ensure the local economy in all parts of the borough does well.

Croydon is a strong economy in its own right, but many of our residents and businesses are connected beyond Croydon. We are increasingly accessible to central London as well as down towards Gatwick and the south coast. **We have bold ambitions for the future of Croydon and the business within it,** whilst continuing to recognise the positive impacts, and challenges, of business change and growth.

► An excellent transport network that is safe, reliable and accessible to all

What does success look like?

- **A reliable public transport system** that ensures safe and convenient travel
- **Easy, accessible, safe and reliable**, making it more convenient to travel between Croydon's local places
- **Less reliance on cars**, more willingness to use public transport, walk and cycle

What we will do

- Partner with Transport for London and Network Rail to improve public transport links to our local high streets, including introducing new bus routes to better connect Croydon's places
- Lobby for the expansion of the tram up to Crystal Palace
- Invest in 400 electric vehicle charging points across the borough
- Expand 20mph zones and tackle congestion around schools
- Invest in safe cycle lanes between central Croydon and local centres



► Croydon is one of the largest London boroughs with connections via road and rail to the south coast, central London and beyond. It is a busy working place where people expect to be able to move about freely and quickly. Assets like the Croydon tram put us in a good position, but we want to invest further and see a real emphasis on better, sustainable transport.

Investment in transport infrastructure is crucial to support the substantial planned growth in housing and business. We know there are parts of the borough that have high levels of congestion and our experience shows that we make far too many short car journeys. As the borough changes and our population increases we want to explore the connections between transport, jobs, housing and wellbeing. This will mean that, when we look at the needs of a neighbourhood, we see transport as a vital element in making it a better and more successful place to live.

Transport for London and rail networks are going to be vital partners in making positive improvements, whether it is making stations accessible, **extending the tram network, or designing bus routes that give people better access to their jobs or local high streets.** One of our key partners is Coast to Capital, a local enterprise partnership that looks after areas including Gatwick and others down towards Brighton. We are working with them to make access into, and through, Croydon as effective as possible. This is vital as we respond to a rapidly growing population that needs to be able to access jobs outside Croydon, in addition to meeting the needs of those commuting into our borough.



The important link between a successful transport policy and a sustainable environment is crucial. This is at the heart of our approach. We will work with residents and businesses to make decisions that will improve the environment, such as making fewer short car journeys and cycling more. This necessitates **a sizeable investment in cycle routes, looking to extend 20mph limits to other borough roads, testing pedestrian zones to reduce traffic**

congestion around schools, and making walking a safer and more pleasant option. It also means encouraging people to change their cars by investing in 400 electric vehicle charging points over the next four years. This approach will help to make Croydon a healthier place for its residents and, overall, a more attractive and successful place.

► We value the arts, culture, sports and activities

What does success look like?

- **Croydon's cultural offer** enhances our town and creates places where people want to live, work and visit
- **Good, affordable and accessible sports and leisure facilities** enable people to be as active and healthy as they want to be
- **Our parks and open spaces** are safe, pleasant, thriving places where everyone can exercise and have fun

What we will do

- Reopen Fairfield Halls with a diverse year round programme
- Grow an annual programme of Croydon events including events that celebrate the borough's rich diversity
- Invest in a modern and active library service that serves all our communities
- Open a new leisure centre in New Addington
- Develop more outdoor active gyms and other sports facilities in parks



► Culture and sport are integral to a healthy, vibrant borough and important drivers for the economy. Our cultural offer will be at the heart of Croydon’s regeneration. It will be a reason for people to come to Croydon, as well as creating exciting opportunities for residents.

Opening in 2019, Fairfield Halls will provide a unique venue to attract visitors from across the borough and beyond. We want to see an ambitious programme delivered across all art forms. We will work with a range of partners, including Fairfield, to support new theatre production for Croydon, and help local venues promote their offers. Our ambition is to **develop a creative enterprise zone, encompassing a new cultural quarter in central Croydon**; a step designed to encourage the borough’s creative industries to flourish.

Croydon’s annual programme of events will continue to grow, **working with local, national and international partners**. Together, we will take successful events like the Croydon International Mela and PrideFest from strength to strength; shaping commissioned programmes to support the night time economy.

Our talented young people, whether stepping forward to be Youth Mayor, leading the annual Youth Takeover Festival or performing at the Brit school, are given many ways to express their ambitions and capabilities. **We want to see this diverse cultural offer grow and for everyone to be able to benefit.**

Our libraries act as community hubs and we will continue to invest in them, so they connect local residents and all our communities; providing information, cultural activities and other services. We will work with a wide range of partners to **support Croydon’s heritage**, this includes developing the role and use of Croydon Clocktower and the David Lean cinema. We want to **celebrate our cultural offer** right across the borough – and in doing so encourage all ages to enjoy and benefit from it.



The opening of a £17.5m leisure centre in New Addington will be a major addition to sports facilities in the borough. We will seek opportunities to improve other leisure facilities in Croydon, working closely with our sporting partners to help local communities. Across the borough we have a network of sporting and leisure clubs, networks and societies that can play a huge part in creating a healthy and happy place. The work of the Crystal Palace foundation remains important in supporting the work we do with young people, and tackling serious issues like knife crime.

We are going to work with local clubs to establish a Croydon marathon as well as increasing sports in parks. We will improve facilities, including **centres for football and more outdoor active gyms**. Our new leisure contract will maximise our facilities and increase the opportunities for residents to participate in active lifestyles.

With recent investment of £2.5m in our facilities, our parks and open spaces will be a cultural resource, helping to **improve wellbeing across all communities through sport and physical activity**. As corporate parents, we will work with foster carers and commissioned providers of care to ensure that all the children and young people in our care are encouraged to take up the fabulous arts, culture and sports offer.

We know that parks are a place for people to enjoy themselves, whether it’s as a space to relax or be active, which is why we will always protect them. Importantly, we will work with residents and communities to do this, giving them a greater role in decisions that affect their parks. **This will have a greater impact in ensuring that local neighbourhoods are positive places for culture, sport and leisure for all.**

Our council

This plan outlines what we want to achieve – better outcomes for our residents.

We know that there are challenges to be met, including the impact of funding reductions, increased demand for services and the issues that face public services nationally.

Focusing on residents’ acute, complex needs can create dependency. Our current delivery model may reduce service demand temporarily, but it comes with a potential knock-on effect, forcing demand elsewhere, which can be more complex, and costly.

We believe we can do more to help our residents to avoid issues becoming problems, to tackle issues of unfairness and inequality, to help our communities be more resilient and families more independent; so that we can all have the best chance in life.

We have a responsibility to provide the best services that we can to meet the needs of residents and families and to work with our partners, local and national, to deliver ambitious programmes for the borough.

To make sure we overcome these challenges, reach our outcomes and sustain them, we have to change the way we deliver our services.

How are we going to deliver?

In 2018 we began to look at what could be done differently and now believe that prevention is key.

Adopting a preventative and collaborative approach is a major shift in delivery; moving to a more supportive, enabling and advisory model.

We also want to change the way residents use our services, and at the same time make sure that they can influence design and delivery. This includes providing the right services locally, where they are needed most.

This work has already begun and is making good progress; demonstrated by our Gateway service and working alongside our partners in health and social care as part of the One Croydon Alliance.

Our next step is to expand the Gateway approach to all issues across the borough.

This is a bold and ambitious agenda that will change the shape of the council in the future. It’s also bigger than just us. It needs to be designed and delivered with our partners and communities.

We’re driving for a big change in public service. A total place approach to service design and delivery, and the work we have done so far shows it’s both possible and productive.

In our work to date, six themes have emerged which collectively represent the way we will operate in the future:

OPERATING MODEL

1

Evidence is key

Building a detailed picture of our borough, our people and our places, by mapping the physical and community assets, spend and demand by localities to understand future opportunities and challenges.

2

Preventing issues becoming problems

Services designed to identify issues early on and target support on promoting independence and enablement to **deliver long-term sustainable solutions.**

3

Locality matters

Place-based, integrated services that help residents to find the information and support they need **within their local community and tailored to local need.**

4

A system wide approach

Collaboration across the borough with other public services, business and the community and voluntary sector to create a seamless system of information, engagement and service delivery.

5

Residents drive what we do

Engaging residents and local communities in the design and where appropriate the delivery of services. **Enabling residents to have a say in the vision for their local areas.**

6

Organisation design

Consideration of the business processes, systems, budgeting, workforce, capacities and capabilities that will reflect the requirements of the operating model.

The importance of partnership

Working with partners will be key in delivering our outcomes successfully. Croydon's established Local Strategic Partnership (LSP) will be central to this. The LSP board sets the strategic direction of the borough. They have representation from cabinet members and chief executives, as well as the voluntary and community sector and faith groups. Public services are represented through the Metropolitan Police, London Fire Brigade, Croydon Clinical Commissioning Group and Croydon Health Services NHS Trust.

The work of the One Croydon Alliance is a great example of this partnership; pooling resources to deliver better outcomes in a more joined up and preventative way.

In addition to the LSP, we need to continue our work with local businesses. As the borough grows, particularly with developments like Westfield and Hammerson, it is crucial that we nurture and improve upon these relationships.

We are extremely fortunate to benefit from a vast and vibrant voluntary, community and faith sector. This sector will play a big part in the delivery of many of our ambitions.



Key work in this space includes:

- Investing in the Community Fund in line with the recommendations of the Opportunity and Fairness Commission.
- Overseeing the administration of the community ward budget – part of a devolution of power to councillors to fund projects.
- Managing community grants for grassroots projects, signposting to other funding opportunities and applying the 'invest to save' approach to Croydon.
- Taking a total place approach to support around community premises and discretionary rate relief.

Working with local umbrella groups such as Croydon Black and Minority Ethnic Forum, Asian Resource Centre Croydon, Croydon Voluntary Action and others will continue to improve our community reach and understanding.

These collaborations are evidenced by a wide range of projects; working together to improve health, wellbeing and tackle issues such as modern day slavery, knife crime and radicalisation.

We'll continue to support activities and festivals that bring the whole community together, including the Croydon International Mela, the Great Get Together and Croydon's annual interfaith bike ride.

Residents remain our greatest assets

Residents are our biggest strength. Working with them is vital in order to get service delivery right.

Involving local communities in our decision making process ensures that we have the right people, in the right place, at the right time.

The recently formed 'We Love SE25' steering group are an example of this. Created as part of a community devolution early adopter area, the group represent South Norwood and Woodside. Made up of local residents and businesses, it will help inform funding decisions and identify priorities; insight that will complement wider engagement activity.

► Our workforce

It's through our workforce that we will realise the ambitions for Croydon

To deliver the commitments set out in this plan, we know that we must have an aligned, clear, workforce strategy, that is developed to recruit, retain and invest in a skilled and well-trained workforce. We want to create a collaborative, inclusive and creative environment that allows talent to flourish, building capacity to meet our ambitions.

Page 762

Our strategy will offer a framework for:-

1. How we support our staff and their health and wellbeing
2. How we pay and reward staff and offer career pathways
3. How we engage and involve our staff and act upon their feedback
4. How we develop the skills and capabilities of our staff
5. How we reflect our values, behaviours and culture through our workforce

We are proud of the diversity of our organisation. Made up of 3,132 employees, we promote opportunities for our staff, ensuring that access to leadership programmes and development are at the heart of the council. We're really invested in developing the huge talent of our workforce, offering:

- a series of leadership programmes
- secondment opportunities
- apprenticeships

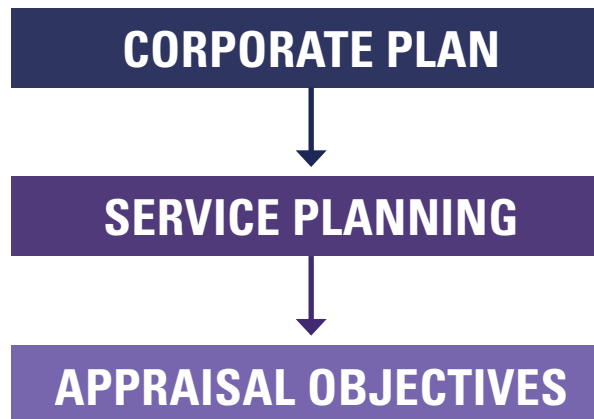
To date our leadership programmes have seen over 220 graduates (May 2018). Of those, 120 are BAME (Black Asian and Minority Ethnic), 181 (81%) identify as female. 42% of all graduates have experienced career progression within the organisation.

Equality is a key driver in our organisation. We want to make sure that our staff have the best opportunities to achieve their ambitions and have access to the support they need.

Over the last two years, the council has achieved significant awards in recognition of our work as an inclusive employer:

- Disability Confident Employer
- Timewise accreditation: flexible working
- Stonewall Workplace Equality Index (top 30% of employers)
- Employers Network for Equality and Inclusion (ENEI):
 - Gold standard award as Overall Employer of the Year – Public Sector 2018
 - Apprenticeship programme of 2018

Our staff take pride in the delivery of our organisational values and ambitions. 91% understand how their roles contribute to the performance of their service. This plan documents our strategic vision. It will shape operational delivery in service planning and individual appraisal objectives. As a result we are all collectively accountable for its success.



We're building on the progress already made

- We've seen an increase in employees' satisfaction and confidence with the council as an employer, evidenced through recent staff surveys, and we continue to build on our good practice.
- We are committed to ensuring that all employees have a voice. We want to provide an environment where they can get involved, helping to shape the future of our services and how we deliver them. We have already seen positive engagement in our last staff survey, evidenced by a high response rate of 75% (2018).
- We have embedded our organisational values and the behaviours which demonstrate them. This ensures that equal weight is given to how we do things, as well as being clear about what we do.
- We continue to offer leadership programmes designed to equip all managers with the skills and competencies necessary to lead staff effectively.



► Workforce statistics

 **3,132**
employees

 **66.19%**
identify as female

 **33.81%**
identify as male


 **42.63%**
are BAME

 **87%**
of staff feel valued by
their line manager

 **5%**
identify as LGBT+

 **8.17%**
declared a disability

 **92%**
of staff feel valued by their team and
feel free to express their views openly

 **88%**
of staff would recommend
Croydon Council as an inclusive
employer

Statistics as at September 2018



— OUR —
CORPORATE
PLAN FOR
CROYDON
— 2 0 1 8 - 2 0 2 2 —

For General Release

REPORT TO:	CABINET 8 JULY 2019
SUBJECT:	CLIMATE CHANGE
LEAD OFFICER:	SHIFA MUSTAFA, EXECUTIVE DIRECTOR FOR PLACE
CABINET MEMBER:	CLLR TONY NEWMAN, LEADER OF THE COUNCIL
WARDS:	ALL
<p>CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON: Sustainability is recognised throughout the Corporate Plan, across development, economy, health, transport and environment. This recognises that becoming more sustainable is not the responsibility of one service, but drives activity across everything we do.</p>	
<p>FINANCIAL IMPACT: No financial impact as a result of these recommendations.</p>	
<p>KEY DECISION REFERENCE NO.: N/A</p>	
<p>The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below</p> <p>RECOMMENDATIONS</p> <p>That the Cabinet:</p> <ol style="list-style-type: none"> 1.1. Establish a new working group, to bring together existing work and identify any gaps or further opportunities to reduce the Council’s carbon emissions and encourage and support residents and businesses to be more sustainable; 1.2. Agree that at the outset this working group be chaired by the Leader of the Council in recognition of sustainability needing to cover everything we do; 1.3. Receive an annual report from the working group on progress. <p>Recommend that Council:</p> <ol style="list-style-type: none"> 1.4. Notes the impact that climate change is already having around the world and the need for urgent action at an international, national and local level; 1.5. Declare a ‘Climate Emergency’; 1.6. Notes the work and commitment that the Council has already made towards sustainability; 1.7. Establish a target for Croydon Council be become carbon neutral by 2030; 1.8. Work with the Mayor of London to meet the aim for London to be a zero-carbon city by 2050; 1.9. Call on the UK Government to provide the powers, resources and help with funding to make this possible; 1.10. Work with communities across Croydon to ensure that all residents and businesses are empowered and encouraged to play their part in making the Croydon the most sustainable borough in London. 1.11. Note the important role of all elected Members in leading this agenda. 	

2. EXECUTIVE SUMMARY

- 2.1 This report highlights the urgent need to take action in response to climate change. The issues has seen increasing public challenge and expectation in tackling climate change.
- 2.2 Croydon Council has a strong track record in sustainability, and the Corporate Plan includes a range of commitments to sustainable growth, environment and making Croydon the greenest borough in London.
- 2.3 The report provides a summary of recent research on climate change and the need for radical and urgent additional action. Declaring a climate emergency will raise the profile of this issue among residents and businesses in Croydon, and provide the framework for the Council to further increase its focus on sustainability.

3. BACKGROUND

- 3.1 Climate change is an international issue, but that does not mean that it is not a key issues for local authorities.
- 3.2 The UK is a signatory to the Paris Agreement (through the European Union), which is a global commitment to mitigate global warming and limit the temperature increase to 1.5°C above pre-industrial levels.
- 3.3 The UN Intergovernmental Panel on Climate Change (IPCC) published a report in October 2018, setting out findings on the impact of a 1.5°C temperature increase above pre-industrial levels. The findings were based on available scientific, technical and socio-economic literature.
- 3.4 According to the IPCC report, human activities are already estimated to have caused approximately 1°C global warming, and likely to reach a 1.5°C increase between 2030 and 2052 based on current rates.
- 3.5 The report highlighted a range of impacts as a result:
 - Increased mean temperature in most land and ocean regions
 - Hot extremes in most inhabited regions (with an increase in sever heatwaves, as seen recently in Europe)
 - Heavy precipitation in several regions (which increases the risk of flooding)
 - Probability of drought in some regions
- 3.6 The report concludes that urgent and unprecedented action is required, with reductions in CO₂ required well before 2030 in order to meet the Paris Agreement target.
- 3.7 The increasing sense of urgency in tackling climate change is seen as one of the reasons for recent increases in demonstrations and protests across the globe, which have included protests in London.

4. CONTEXT

4.1 Croydon has a track record of promoting sustainability across its own organisation, and for residents and businesses. As stated above, sustainability as a key theme flowing through the Corporate Plan. Actions have included:

- Work is already underway on planting 3,500 new trees by 2023
- Embracing Clean Air Day, with school competitions, vehicle checks and promoting alternative travel options
- Increasing our recycling rate
- Reducing energy use
- Introduction of e-bike hire scheme
- Promoting sustainable development and sustainable growth
- Divesting pension funds from fossil fuels
- Ambitious targets for electric vehicle charging points

4.2 A number of Councils have declared a climate emergency, as well as the Mayor of London. The first London Climate Action Week is taking place from 1 – 8 July. As the largest borough in London, Croydon has a key role to play in tackling climate change.

4.3 London Climate Action Week will focus on:

- community action and business leadership on climate
- clean energy and energy efficiency
- adaptation and resilience
- climate finance and investment
- legal, engineering and other environmental consultancy services
- low emission transport
- London's role in driving UK and international climate leadership
- Improving air quality around schools, including 'School Street' project to tackle congestion around schools.

5. SUSTAINABLE CROYDON SUMMIT

5.1 On 27 June 2019, the Leader of the Council hosted the first Sustainable Croydon Summit, bringing together schools, businesses, residents and stakeholders to discuss the opportunities for Croydon to become more sustainable.

5.2 Approximately 180 people attended the event, including over 40 students from schools across Croydon.

5.3 The event provided an opportunity to hear from key speakers on the impact that climate change has on people, and the opportunities to make changes.

5.4 The event included interactive sessions where attendees made pledges on the changes that each could to be more sustainable.

5.5 The Council also announced the launch of the Green Croydon Fund, with £250k allocated for community projects in Croydon that deliver a benefit around environmental protection, green living or sustainable lifestyles. Attendees were able to provide feedback and suggestions on the type of projects that should be

supported, and this will inform the final criteria and application process, which will launch in September.

- 5.6 A full report from the summit is being prepared and will be reported to Cabinet in September 2019.

6. CLIMATE EMERGENCY

- 6.1 The recommendations recognise the findings from the UN, which highlight the need for urgent and radical action. By declaring a climate emergency, Croydon Council is showing its ongoing commitment to sustainability and making Croydon the greenest borough in London.
- 6.2 The commitment will also raise the profile of this issue among residents and businesses, as action by the Council alone will be insufficient.

7. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 7.1 There are no initial direct financial considerations arising from this report. The financial detail for any specific projects / activities, including costs, savings and benefits will be developed by the working group.
- 7.2 There is, however, an increasing risk if no action is taken. Climate change is linked with severe weather events, such as flooding and heat waves. These events increase the risk of harm to residents, particularly the more vulnerable. There is also additional costs incurred when responding to these events.

Approved by: Lisa Taylor, Director of Finance, Investment and Risk & S151 Officer

8. LEGAL CONSIDERATIONS

- 8.1 The Climate Change Act 2008 commits the UK government to reducing greenhouse gas emissions. The Act provides for the setting of legally binding 'carbon budgets'. The Act also puts in place a policy framework in the UK to promote adaptation to climate change in five yearly cycles. The Government has pledged to introduce a legally binding target for the UK to have net-zero greenhouse gas emissions.
- 8.2 The European Union Air Quality Directive 2008/50/EC has been transposed into English law as the Air Quality Regulations 2010.
- 8.3 In January 2018 the government published a 25 Year Environment Plan which sets out the government's goals for improving the environment within a generation. The Plan's broad goals are clean air, clean and plentiful water, thriving plants and wildlife, a reduced risk of harm from environmental hazards such as flooding and drought, using resources from nature more sustainably and efficiently, enhanced beauty, heritage and engagement with the natural environment, mitigating and adapting to climate change, minimising waste, managing exposure to chemicals and enhancing biosecurity.

- 8.4 In May 2018 under changes made by the Localism Act 2011 to the Greater London Authority Act 1999 ('GLA Act') the Mayor of London published a London Environment Strategy. Section 351A of the GLA Act prescribes what the Environment Strategy must contain bringing together six separate environmental strategies around biodiversity, municipal waste management, climate change mitigation and energy, adaptation to climate change, air quality and ambient noise. The London Environment Strategy also contains a general assessment of London's environment. In addition, the GLA Act also requires environmental policy to be reflected in other strategies published by the Mayor such as the London Plan, the Transport Strategy and the Police and Crime Plan.
- 8.5 In relation to air quality the Council must have regard to the air quality provisions within the Mayor's Strategy when exercising its local air quality management functions under the Environment Act 1995 and related Defra guidance.
- 8.6 To address climate change mitigation and energy as a borough Planning Authority the Council is responsible for enforcing the low carbon and energy efficient building design and operation of standards of development set out in the London Plan.
- 8.7 When considering adapting to climate change the Council is a Lead Local Flood Authority with respect to surface water and groundwater flooding. The Borough Director of Public Health is responsible for implementing Public Health England's national heatwave plan in order to manage population health and well-being.

Approved by Sandra Herbert Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer.

9. HUMAN RESOURCES IMPACT

- 9.1 There is no human resources impact arising from this report.

Approved by: Gillian Bevan, Head of Human Resources on behalf of the Director of Human Resources

10. EQUALITIES IMPACT

- 10.1 There is no negative impact on groups that share protected characteristics.
- 10.2 However, creating a more sustainable environment will impact positively on health outcomes, as a result of cleaner air, sustainable employment and housing. This will contribute towards the Corporate Plan objectives of creating a fairer Croydon.

Approved by: Yvonne Okiyo, Equalities Manager

11. SUSTAINABILITY IMPACT

- 11.1 By declaring a climate emergency, Croydon Council is committing to tackle climate change. This will have a positive environmental impact, in particular in relation to air quality and health for residents and visitors. Further details and monitoring will be undertaken by the Working Group.

12. CRIME AND DISORDER REDUCTION IMPACT

- 12.1 There is no crime and disorder impact arising from this report.

CONTACT OFFICER: Gavin Handford, Head of Policy and Strategy

APPENDICES TO THIS REPORT:

None

BACKGROUND PAPERS:

Special Report: Global Warming of 1.5°C, UN Intergovernmental Panel on Climate Change, October 2018. <https://www.ipcc.ch/sr15/>

REPORT TO:	SCRUTINY AND OVERVIEW COMMITTEE 23 March 2021
SUBJECT:	CALL IN: Crystal Palace & South Norwood Low Traffic Neighbourhood
LEAD OFFICER:	Stephen Rowan, Head of Democratic Services and Scrutiny
CABINET MEMBERS:	Councillor Muhammad Ali, Cabinet Member for Sustainable Croydon

ORIGIN OF ITEM:	This item has been triggered by the call-in of the decision (6520SC) by the Cabinet Member for Sustainable Croydon on 23 February 2021.
BRIEF FOR THE COMMITTEE:	To consider and respond to the Call-In in accordance with the procedure set out in the Council's constitution (set out in paragraph 2.3 below).

1. EXECUTIVE SUMMARY

- 1.1 The decision taken on the Crystal Palace and South Norwood Low Traffic Neighbourhood by the Cabinet Member for Sustainable Croydon on 23 February 2021 has been called-in by fourteen members of the Council. The decision was made by the Leader to delegate this decision to the Cabinet Member for Sustainable Croydon.
- 1.2 Attached to this report are:
- **Appendix A** is the completed call in form that was received by the Monitoring Officer
 - **Appendix B** is the Key Decision Notice and the Crystal Palace and South Norwood Low Traffic Neighbourhood decision report.
 - **Appendix C** is a copy of a second call-in request received on the same decision (for the information of the Committee).

2. CALL-IN – CRYSTAL PALACE AND SOUTH NORWOOD LOW TRAFFIC NEIGHBOURHOOD

- 2.1 The decision taken by the Cabinet Member for Sustainable Croydon, that is the subject of this call-in, was as follows:

Having carefully read and considered the Part A report, and the requirements of the Council's public sector equality duty in relation to the issues detailed in the body of the reports, the Cabinet Member for Sustainable Croydon

RESOLVED to:

1. *Subject to Spending Control Panel agreeing to the spending of ring fenced grant funding to implement an Experimental Low Traffic Neighbourhood at Crystal Palace and South Norwood 'Experimental LTN' by the making of an Experimental Traffic Regulation Order (Experimental TRO) to operate for up to 18 months, to:*

- a. *prohibit access and egress by motor vehicles (other than certain exempt vehicles) at the following locations:*
 - i. *Sylvan Hill at the common boundary of Nos.11 and 13*
 - ii. *Lancaster Road junction with Goat House Bridge*
 - iii. *Fox Hill junction with Braybrooke Gardens*
 - iv. *Stambourne Way junction with Auckland Road*
 - v. *Bus gate introduced at the common boundary of Nos. 86 and 84a (Auckland Road Surgery) Auckland Road*
 - b. *These restrictions to be enforced through Automatic Number Plate Recognition (ANPR) camera technology.*
 - c. *The restrictions shall not apply in respect of:*
 - i. *a vehicle being used for fire brigade, ambulance or police purposes;*
 - ii. *anything done with the permission of a police constable in uniform or a civil enforcement officer;*
 - iii. *a vehicle being used for the purposes of a statutory undertaker in an emergency, such as the loss of supplies of gas, electricity or water to premises in the area, which necessitates the bringing of vehicles into a section of road to which the order applies;*
 - iv. *buses;*
 - v. *licensed taxis*
 - vi. *Dial-a-Ride vehicles;*
 - vii. *vehicles to which a valid exemption permit has been provided.*
 - d. *Introduce two disabled persons Blue Badge parking bays outside Nos 84 and 86 Auckland Road.*
2. *Instruct officers to continue to seek to work with those in Bromley Council to mitigate effects predicted to arise from the Experimental LTN in certain residential access streets in Bromley and to address concerns about potential effects on air quality.*
 3. *Delegate to the Director of Public Realm the authority to vary the provisions of the Experimental TRO including the exemptions to the restrictions.*
 4. *In relation to Equality, agree:*
 - a. *that the equality implications of the recommended Experimental Traffic Regulation Order have been the subject of careful consideration in compliance with the Council's obligations under sections 1 and 149 of the Equality Act 2010;*
 - b. *nevertheless there should be further equality impact analysis including through focused engagement with the members of groups with protected characteristics potentially most affected by the proposed change in and around the area of the Experimental LTN during the operation and any change of the Experimental TRO;*
 5. *Ensure that a recommendation on the future for the Experimental LTN be brought to the Traffic Management Advisory Committee at the appropriate time if considered desirable prior to the expiry of the Experimental TRO and in any event as soon as is practicable after 12 months of the experimental order being in place.*

2.2 The call-in pro-forma is attached at Appendix A. The decision form was received on 23 February 2021 from Councillor Stephen Mann and signed by fourteen Councillors: Nina Degrad, Pat Ryan, Mary Croos, Jerry Fitzpatrick, Patricia Hay-Justice, Chris Clark, Maddie Henson, Caragh Skipper, Alison Butler, Humayan Kabir, Jamie Audsley, Patsy Cummings and Pat Clouder.

2.3 The reasons stated for the Call-In are that:

“We wish to call in the LTN decision to Overview and Scrutiny Committee following the recent TMAC Decision to review the process the Council has followed in developing and implementing the LTN.

While we welcome the changes considered at the February meeting to include an expanded exemption scheme and work to improve car club provision, we believe that the Council could have better communicated the vision and policy drivers behind the scheme; better timed interventions during the temporary phase and could be more ambitious in what it seeks to deliver for the area.

We recognise the high level of opposition shown as a result of the consultation both inside and outside the LTN zone and wish the Cabinet Member to set out how the Council will work with these residents, and those in favour, to ensure the scheme works for all.

We wish the Committee and the Cabinet Member to review the following suggestions for improvement to the scheme as set out during the meeting:

1. Air Quality monitoring along South Norwood Hill, Church Road, Westow Hill, Crown Dale, Beulah Hill, Central Hill is undertaken and appropriate resolution is looked at.
2. Explore improving cycling along Church Road and the wider main road network
3. Talks resume with Bromley Council to address the Milestone, Patterson, Cintra issue
4. The Council sets out its engagement strategy with residents, businesses and the five Boroughs at the outset and this is at the heart of the experimental period
5. The Council should consider staging a Citizens Assembly on the LTN and the delivery of the Fresh Air Suburb.
6. Engagement takes place with businesses to paint a clear picture of customer travel patterns and congestion on the Triangle and appropriate interventions are made to reduce congestion and pollution while driving up active travel.
7. Explore working with delivery firms, app companies and developers to pilot sustainable deliveries in and around the zone using (e-)bikes and ZE-Vehicles.”

2.4 The outcomes desired from the Call-In are stated as bringing forward and reviewing the lessons learned from this decision we wish the Council to look at best practice as set by other Boroughs to deliver a clear vision and plan for reducing congestion and improving air quality on all roads, creating healthier streets for residents be this via a rolling programme of LTNs or other interventions:

2.5 The Call-In request has also set out the information it requires to assist the consideration of the referral. The information requested is stated as:-

- i. All relevant documents relating to the Crystal Palace & South Norwood Low Traffic Neighbourhood.

ii. Relevant documents relating to other relevant LTN programmes

2.6 In addition to the call-in in request presented to the Scrutiny and Overview Committee for its consideration, a second call-in request was received for this decision. As the Council's Constitution only allows a decision to be subject to one call-in request, the first received is the one presented to the Committee. A copy of the second call-in request is attached at Appendix C for the information of the Committee.

3. CALL-IN PROCEDURE

3.1 The Council's Constitution, Part 4E Scrutiny & Overview Procedure Rule, states:

“11.08 The referral shall be considered at the next scheduled meeting of the Scrutiny and Overview Committee unless, in the view of the Borough Solicitor, this would cause undue delay. In such cases the Borough Solicitor, will consult with the decision-taker and the Chair of Scrutiny and Overview to agree a date for an additional meeting. The Scrutiny and Overview Committee may only consider a maximum of three referrals at any one meeting.

11.09 At the meeting, the referral will be considered by the Committee which shall determine how much time it will give to the call-in and how the item will be dealt with including whether or not it wishes to review the decision. If having considered the decision there are still concerns about the decision then the Committee may refer it back to the Cabinet for reconsideration, setting out in writing the nature of the concerns. The Cabinet shall then reconsider the decision, amending the decision or not, before making a final decision.

11.10 The Scrutiny and Overview Committee may refer the decision to the Council if it considers that the decision taken by the Leader or Cabinet is outside the Budget and Policy Framework of the Council. The Council may decide to take no further action in which case the decision may be implemented. If the Council objects to Cabinet's decision it can nullify the decision if it is outside the Policy Framework and/or inconsistent with the Budget.

11.11 If the Scrutiny and Overview Committee decides that no further action is necessary then the decision may be implemented.

11.12 If the Council determines that the decision was within the Policy Framework and consistent with the Budget, it will refer any decision to which it objects, together with its views on the decision, to the Cabinet. The Cabinet shall choose whether to either, amend, withdraw or implement the original decision within 10 working days or at the next meeting of the Cabinet after the referral from the Council.

11.13 The responses of the decision-taker and the Council shall be notified to all Members of the Scrutiny and Overview Committee once the Cabinet or Council has considered the matter and made a determination.

11.14 If either the Council or the Scrutiny and Overview Committee fails to meet in accordance with the Council calendar or in accordance with paragraph 11.08 above, then the decision may be implemented on the next working day after the meeting was scheduled or arranged to take place.”

CONTACT OFFICER:

Simon Trevaskis

(Senior Democratic Services and Governance
Officer)

020 8726 6000 x 84384

Simon.Trevaskis@croydon.gov.uk

Appendix A is the completed call in form that was received by the Monitoring Officer

Appendix B is the Key Decision Notice and the Crystal Place and South Norwood Low Traffic Neighbourhood decision report.

Appendix C is a copy of a second call-in request received on the same decision (for the information of the Committee).

PROFORMA

CALL-IN - REFERRAL OF A KEY DECISION BY THE SCRUTINY AND OVERVIEW COMMITTEE

For the attention of Cllr Muhammad Ali

Key Decision Number 6520SC

We wish to call in the LTN decision to Overview and Scrutiny Committee following the recent TMAC Decision to review the process the Council has followed in developing and implementing the LTN.

While we welcome the changes considered at the February meeting to include an expanded exemption scheme and work to improve car club provision, we believe that the Council could have better communicated the vision and policy drivers behind the scheme; better timed interventions during the temporary phase and could be more ambitious in what it seeks to deliver for the area.

We recognise the high level of opposition shown as a result of the consultation both inside and outside the LTN zone and wish the Cabinet Member to set out how the Council will work with these residents, and those in favour, to ensure the scheme works for all.

We wish the Committee and the Cabinet Member to review the following suggestions for improvement to the scheme as set out during the meeting:

- 1) Air Quality monitoring along South Norwood Hill, Church Road, Westow Hill, Crown Dale, Beulah Hill, Central Hill is undertaken and appropriate resolution is looked at.
- 2) Explore improving cycling along Church Road and the wider main road network
- 3) Talks resume with Bromley Council to address the Milestone, Patterson, Cintra issue
- 4) The Council sets out its engagement strategy with residents, businesses and the five Boroughs at the outset and this is at the heart of the experimental period
- 5) The Council should consider staging a Citizens Assembly on the LTN and the delivery of the Fresh Air Suburb.
- 6) Engagement takes place with businesses to paint a clear picture of customer travel patterns and congestion on the Triangle and appropriate interventions are made to reduce congestion and pollution while driving up active travel.

- 7) Explore working with delivery firms, app companies and developers to pilot sustainable deliveries in and around the zone using (e-)bikes and ZE-Vehicles.

In bringing forward and reviewing the lessons learned from this decision we wish the Council to look at best practice as set by other Boroughs to deliver a clear vision and plan for reducing congestion and improving air quality on all roads, creating healthier streets for residents be this via a rolling programme of LTNs or other interventions.

Alternative decision proposed:

N/A – recommendations to be adopted into the scheme

Information required to assist the Scrutiny and Overview Committee to consider the referral:

All relevant documents related to the CPUN & SN LTN

Relevant documents relating to other relevant LTN programmes

Signed:

Stephen Mann

Date:23 Feb 2021

Nina Degrads

Date:23 Feb 2021

Pat Ryan

Date:23 Feb 2021

Mary Croos

Date:23 Feb 2021

Jerry Fitzpatrick

Date:23 Feb 2021

Patricia Hay-Justice

Date:23 Feb 2021

Chris Clark

Date:23 Feb 2021

Maddie Henson

Date:23 Feb 2021

Caragh Skipper

Date:23 Feb 2021

Alison Butler

Date:23 Feb 2021

Humayan Kabir

Date:23 Feb 2021

Jamie Audsley

Date:23 Feb 2021

Patsy Cummings

Date:23 Feb 2021

Pat Clouder

Date:23 Feb 2021

PROFORMA

REFERRAL OF A KEY DECISION TO THE SCRUTINY AND OVERVIEW COMMITTEE

For the attention of: Victoria Lower, Democratic Services & Scrutiny
e-mail to
Victoria.lower@croydon.gov.uk and cliona.may@croydon.gov.uk

Meeting:
Meeting Date:
Agenda Item No:

The constitution of the low traffic neighborhood (LTN) in Crystal Palace and South Norwood / introduction of experimental traffic management order etc

Reasons for referral:

- i) The decision is outside of the Policy Framework: Yes
 - ii) The decision is inconsistent with the budget
 - iii) The decision is inconsistent with another Council Policy: Yes
 - iv) Other: Please specify: Yes (see below)
-
-
-

Outside policy framework (evidence-based policy making)

No evidence of positive change – no baseline assessment was conducted prior to the introduction of the scheme. As such there is no evidence that this scheme is improving local air quality or any other aspect of the local environment. We are being asked to rely on intuitive assumptions or studies from outside the area. Some studies indicate that low traffic neighborhoods are bad for the local environment. This does not seem to have been fully considered by the council.

Fiscally motivated – the introduction of ANPR cameras looks set to raise over £3million for the council. Increased revenue figures from ANPR technology have been included in early versions of the emergency budget. There is a huge concern that this decision has been motivated by the council's financial crisis and as such, pre-determined prior to the beginning of the consultation.

Inconsistent with another council policy (bad for business)

Bad for local businesses – the council has identified supporting local businesses as a corporate priority. But these measures are bad for business. They risk driving away footfall. At a time when businesses are already struggling because of the Covid-19 crisis and corresponding lockdowns/social media, there is a strong feeling that the council should be going out of its way to show support. Not introduce experimental

schemes.

Other: lack of opportunity for member scrutiny

Lack of opportunity for members to scrutinise – this decision has never been properly discussed and debated at cabinet or full council. It was discussed at TMAC but given the scale of opposition to it as expressed through the consultation, more debate by members would be appropriate.

The outcome desired:

Scrutiny to have confidence that members have properly had chance to question and scrutinise the policy

Scrutiny to have confidence the policy has been based on evidence

Scrutiny to have confidence that the policy is not fiscally motivated

Scrutiny to have confidence that the policy does not harm local businesses

Information required to assist the Scrutiny and Overview Committee to consider the referral:

All evidence around the impact of LTNs, including studies that suggest negative impact

Evidence of a timeline of decision making. This should include a breakdown of the ANPR figures in the emergency budget. Which cameras were expected to generate the revenue?

Signed: Gareth Streeter, Opposition spokesperson for Environment, Transport and Regeneration

Date: 22/01/2021

Member of _____ Committee

This page is intentionally left blank

For general release

REPORT TO:	SCRUTINY & OVERVIEW COMMITTEE 23 March 2021
SUBJECT:	CRYSTAL PALACE AND SOUTH NORWOOD LOW TRAFFIC NEIGHBOURHOOD
LEAD OFFICER:	Mark Averill, Head of Highways and Parking
CABINET MEMBER:	Cllr Muhammad Ali, Cabinet Member for Sustainable Croydon
PERSON LEADING AT SCRUTINY COMMITTEE MEETING:	Mark Averill, Head of Highways and Parking

CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON:

Corporate Priority/Policy Context/ Ambitious For Croydon

The recommendations of the decision that is the subject of the call in address the Council's Corporate Plan priorities:

- Easy, accessible, safe and reliable, making it more convenient to travel between Croydon's local places
- Less reliance on cars, more willingness to use public transport, walk and cycle and
- Invest in safe cycle lanes between central Croydon and local centres

Climate Emergency

The recommendations address priorities in the Climate Change report and the resulting declaration of a 'Climate Emergency', priorities including:

- Croydon Council become carbon neutral by 2030;
- Work with the Mayor of London to meet the aim for London to be a zero-carbon city by 2050;
- Work with communities across Croydon to ensure that all residents and businesses are empowered and encouraged to play their part in making the Croydon the most sustainable borough in London;
- Role of all elected Members in leading this agenda.

1. EXECUTIVE SUMMARY

- 1.1** This report details the officer response to the grounds for call-in.
- 1.2** The reports presented to the Traffic Management Advisory Committee on 12th January and 15th February outline the Council's approach to creating and managing a low traffic neighbourhood, now referred to as a Healthy Neighbourhood, in support of the policy objectives of both the Council and the Mayor of London.
- 1.3** The call-in has not suggested the decision on implementing the Healthy Neighbourhood be reversed, it has raised a number of specific queries that this report seeks to answer.

- 1.4 The officer response describes how the proposal will be managed in light of the points raised.

2. CRYSTAL PALACE AND SOUTH NORWOOD LOW TRAFFIC NEIGHBOURHOOD

2.1 POLICY BACKGROUND

2.1.1 The policy background is outlined at length in the reports presented to TMAC in January and February.

2.1.2 The aim of the scheme is to

- Promote sustainable transport alternatives, such as walking, cycling, car clubs etc., by removing extraneous traffic from the local residential network
- Improve air quality by reducing traffic levels
- Help to combat the obesity crisis by providing safe routes for people to exercise and access local shops etc.

2.2 ENGAGEMENTS

2.2.1 The original scheme proposal was consulted upon in late 2020. A large number of residents responded, with the majority of respondents expressing a desire for the scheme to be removed in its entirety.

In light of the policy context a revised scheme has been proposed that will run as an Experimental Traffic Management Order. The new scheme uses Automatic Number Plate Recognition (ANPR) cameras to manage the traffic using the Healthy Neighbourhood, allowing residents full permeability whilst also satisfying the requests of the emergency services for full access to the neighbourhood.

2.3 RESPONSE TO REASONS FOR REFERRAL of the CRYSTAL PALACE AND SOUTH NORWOOD LOW TRAFFIC NEIGHBOURHOOD

2.3.1 The Members that have brought forward the Call In are broadly in favour of the decision, there are however seven points that they wish to be considered and, where possible, incorporated in to the experimental scheme. Any amendment to the scheme will be made in accordance with the scheme of delegation.

- 1 Air Quality monitoring along South Norwood Hill, Church Road, Westow Hill, Crown Dale, Beulah Hill, Central Hill is undertaken and appropriate resolution is looked at.
- 2 Explore improving cycling along Church Road and the wider main road network
- 3 Talks resume with Bromley Council to address the Milestone, Patterson, Cintra issue
- 4 The Council sets out its engagement strategy with residents, businesses and the five Boroughs at the outset and this is at the heart of the experimental period
- 5 The Council should consider staging a Citizens Assembly on the LTN and the delivery of the Fresh Air Suburb.
- 6 Engagement takes place with businesses to paint a clear picture of customer travel patterns and congestion on the Triangle and appropriate interventions are made to reduce congestion and pollution while driving up active travel.
- 7 Explore working with delivery firms, app companies and developers to pilot sustainable deliveries in and around the zone using (e-)bikes and ZE-Vehicles.

2.3.2 Air Quality monitoring along South Norwood Hill, Church Road, Westow Hill, Crown Dale, Beulah Hill, Central Hill is undertaken and appropriate resolution is looked at.

The Council will be commissioning air quality monitoring and traffic surveys that will look at the impacts of the proposed camera enforced healthy neighbourhood, both on the streets within its boundary and on bordering roads once permission has been given. In fact, over 30% of the budget for the implementation of the camera enforced healthy neighbourhood scheme has already been allocated for surveys of this nature. Once the surveys have been completed and information analysed subject to the availability of funds and resources the Council will consider viable ways to improve air quality on surrounding roads.

2.3.3 Explore improving cycling along Church Road and the wider main road network.

The Council has an active Transport for London funded Walking & Cycling Programme that looks at ways in which the borough road network can be improved to make it more accessible for both pedestrians and cyclists. This programme was paused last year because of changes in TfL's funding arrangements as a result of covid-19 and the introduction of the Streetspace for London programme. However, TfL is looking to restart this and other programmes in the new financial year. The Council has an extensive programme that targets improvements for cyclists and pedestrians, part of this includes increasing cycle parking in the form of bikehangars etc. that encourage people to purchase cycles and store them in a secure way. In addition the Council has used Active Travel and Streetspace funding to create segregated cycle lanes in the Town Centre and other Healthy Neighbourhoods. In relation to Church Road specifically, the Council made highway changes here some years ago in order to improve facilities for cyclists, this included removing on street parking bays and traffic islands that created pinch points for cyclists and the introduction of an advisory cycle lane.

2.3.4 Talks resume with Bromley Council to address the Milestone, Patterson, Cintra issue

The Council can confirm that from the point of implementing the temporary scheme up until now the Council has communicated with our counterparts in London Borough of Bromley. The Council is committed to continue discussions on the impacts of a proposed camera enforced healthy neighbourhood and agree any mitigation measures for streets within Bromley that may be affected by this scheme. The negotiations with Bromley are legislative and are governed by S121b of the Road Traffic Regulation Act 1984.

2.3.5 The Council sets out its engagement strategy with residents, businesses and the five Boroughs at the outset and this is at the heart of the experimental period.

The Council fully accepts and acknowledges that effective communication and engagement is key to make this and other similar schemes successful. All those affected by the neighbourhood will be invited to provide their feedback and this will be at the heart of transitioning from an experimental scheme to a permanent healthy neighbourhood should that be the desired outcome. The Council is actively developing a sound communication and engagement plan that will clearly set out our strategy for communicating details of the proposed camera enforced scheme with all key stakeholders, this includes for residents,

schools, emergency services and neighbouring boroughs.

2.3.6 The Council should consider staging a Citizens Assembly on the LTN and the delivery of the Fresh Air Suburb.

We commit to working with the community to promote engagement along the lines achieved by the original Citizens' Assembly. It is our intention to undertake this work in the late summer/ early autumn.

Engagement takes place with businesses to paint a clear picture of customer travel patterns and congestion on the Triangle and appropriate interventions are made to reduce congestion and pollution while driving up active travel.

The Council's communication and engagement strategy for Healthy Neighbourhoods, due to be published soon, will set out clearly how the Council intends to engage with local businesses and understand their needs. The Council understands the challenges associated with congestion and pollution around the Crystal Palace Triangle. Local businesses, like other stakeholders, will be able to provide their feedback on the experimental scheme, this feedback will be reviewed and sustainable solutions will be considered with the aim of reducing congestion and increasing active travel.

2.3.7 Explore working with delivery firms, app companies and developers to pilot sustainable deliveries in and around the zone using (e-)bikes and ZE-Vehicles.

As part of our communications and engagement strategy our intention is to seek views from delivery companies such as major supermarkets on the scheme. During these discussions we will explore with them how to use greener/cleaner methods of transporting & delivering goods such as bikes or electric vehicles. In an attempt to encourage the purchase and use of electric vehicles the Council is currently working on a programme to implement a number of electric charge points that will help with encouraging residents and possibly delivery firms to use this method of transporting goods in the future.

3 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

The financial and risk assessment considerations remain as per the original reports to the Traffic Management Advisory Committee.

The scheme is to be wholly funded by TfL via their LIP allocation to the Council

4 LEGAL CONSIDERATIONS

- 4.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that the relevant Key Decision has received a 'Call-In', see Constitution Part 4E Article 11. Therefore the matter should be considered at a meeting of the Scrutiny and Overview Committee. At the meeting the Committee shall decide how the item will be dealt with, including whether or not to review the decision. The Committee may refer the decision back to the Cabinet, who shall then reconsider the decision, amending the decision or not, before making a final decision. The Committee may refer the decision to the Council if it thinks it is outside the Budget and Policy Framework of the Council.

Approved by, Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer.

5 HUMAN RESOURCES IMPACT

- 5.1 The recommendations in this report do not have any human resources implications. Any HR issues which arise other than in the planned budget and establishment will be managed under the Council's policies and procedures.

Approved by: Jennifer Sankar, Head of HR Place on behalf of Sue Moorman, Director of HR

6 EQUALITIES IMPACT

- 6.1 The Equalities Impact Assessment was undertaken to assess the potential impact on groups that share protected characteristics. This is contained within the original reports to TMAC. These concluded:
- that historic decisions continue to have equality implications
 - The Equality Analysis concludes that the potential effects of the proposed change are greatest in terms of effects on members of a group with the 'Age' related protected characteristic. It reports that around a quarter of the population living within the proposed Experimental LTN are under age 18, and consequently cannot drive. Young adults nationally are much less likely to hold a driving licence. Children are the group whose independent mobility has been most curtailed by past decisions, changes and trends. Through reduced freedom to travel actively and to play in the street, they are at risk of long term health issues. They are also the ones who will experience the greatest impacts of Climate Change, if CO2 emissions (including those from road transport) are not addressed. At the other end of the age spectrum, the percentage of journeys made by older people in the UK, is very much lower than in many other northern European countries. Children and young people are amongst those considered most likely to benefit from the proposed scheme, but it can help older people consider returning to cycling or to start cycling, including using E-bikes.
 - The Equality Analysis reports that the street has historically been where much of the life of the town/city takes place. It was community space which also happened to have a movement function. Lowering traffic levels has the potential for the role of the street as community space to return to a degree, depending on the residual traffic level. This in turn can help foster community cohesion and facilitate the fostering of good relations between members of groups with protected characteristics and others (something difficult to achieve if everyone travels to and from their own home, in their own car).
 - The Equality Analysis explains that further equality impact work can and should be undertaken during the operation of the trial scheme and design of anything that might follow it. It recommends that:
 - The further analysis should be informed by research conducted during the trial, focused on the experiences of members of those groups with protected characteristics, predicted to be affected by the trial.
 - There should be a dialogue with Dial-A-Ride, Community Transport and SEN Transport operators and with users, to help refine the operation of the trial and the analysis.
 - The Croydon Mobility Forum has not met during the Pandemic. The Forum should be engaged with during the operation of the trial, its views

informing the analysis, the operation of the trial and the design and operation of any scheme that might follow the trial.

- A subsequent Equality Analysis should be carried out before any decision is made on the outcome of and the future for the trial and should be published as part of the documents used in making the recommendation.
- Members of the public have suggested that the current Temporary LTN has had the effect of increasing traffic congestion elsewhere, including on the A Roads at the edges of the Temporary LTN. It is suggested that this has worsened air quality at these locations, and these are locations where greater numbers of members of Black and Minority Ethnic groups are living. This is a factor which has been considered in making the recommendation to implement the experimental TRO. This aspect should be investigated as part of the monitoring strategy for and the further equality impact analysis of the Experimental LTN.
- The recommendations for an Experimental Traffic Order have been the subject of a detailed equality analysis. This analysis will continue to be updated and developed as new information emerges including from the monitoring of the recommended Experimental LTN (if implemented). In January, Transport for All published the report 'Pave the Way'.

This Equalities Impact section should be read in conjunction with that in the 12th January 2021 and 15th February 2021 Reports, when considering the recommendations.

- 6.2 The Council will ensure the communication and engagement plan has equality considerations and we take all the necessary steps to engage with vulnerable groups and groups that share protected characteristics. This will also include engaging with a diverse spectrum of local businesses. Similarly, we will ensure all communications are easy to understand and accessible in relation to language and format.
- 6.3 We will also ensure the Citizens Assembly type engagement is diverse and representative of all communities

Approved by: Yvonne Okiyo, Equalities Manager

7 ENVIRONMENTAL IMPACT

The purpose of the scheme is to promote sustainable transport alternatives, such as walking, cycling, car clubs etc., by removing extraneous traffic from the local residential network. This will contribute to an overall reduction in emissions of NOx and on average will improve air quality in the Borough.

8 CRIME AND DISORDER REDUCTION IMPACT

- 8.1 There are no foreseeable impacts on this.

9 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 9.1 There has been considerable public concern expressed regarding the perceived effects of the Temporary LTN. In the light of that concern, a recommendation to implement a permanent scheme of a similar nature at this location is not proposed. Rather a trial, the effects of which can be monitored and assessed, is recommended. Much of the concern expressed relates to the view that the Temporary LTN has led to increased congestion elsewhere, with

resulting environmental effects impacting certain groups to a greater extent. An experimental traffic order is time limited and allows a traffic management scheme to be 'modelled in reality', allowing a realistic and more accurate assessment of effects. An experiment allows some further adjustment and improvement of measures whilst it is running. If deemed unsuccessful the experiment can be halted and / or not made permanent.

- 9.2 Engagement on the future of the Temporary LTN was broad (reaching a good many people, many living a considerable distance from the LTN) but was not deep. In the Covid19 Pandemic it was difficult to reach out to members of groups mostly likely to be positively or negatively affected by the measures. The Experiment is the opportunity to reach out to these groups and include their experiences within the monitoring and assessment.

10 OPTIONS CONSIDERED AND REJECTED

The options considered and rejected are:

- 1) removing the Temporary LTN and not replacing it with anything
- 2) removing the Temporary LTN and replacing it with a Permanent LTN

Appendices

No Appendices

CONTACT OFFICER: *Mark Averill, Head of Highways and Parking*

BACKGROUND DOCUMENTS:

- 1: [Traffic Management Advisory Committee, 12 January 2021, The Crystal Palace and South Norwood Low Traffic Neighbourhood](#) – Pages 29 to 370
 - 2: [Decision, 29 January 2021, Crystal Palace and South Norwood Low Traffic Neighbourhood](#)
 - 3: [Traffic Management Advisory Committee, 15 February 2021, Crystal Palace and South Norwood Low Traffic Addendum Report](#)
 - 4: [Decision, 23 February 2021, Crystal Palace and South Norwood Low Traffic Neighbourhood](#)
 - 5: [Corporate Plan for Croydon 2018-2022](#)
 - 6: [Climate Change report](#)
-

This page is intentionally left blank

Public Document Pack

Scrutiny & Overview Committee

Meeting held on Tuesday, 23 March 2021 at 6.30 pm in This meeting will be held remotely

MINUTES

Present: Councillor Sean Fitzsimons (Chair), Councillor Robert Ward (Vice-Chair), Leila Ben-Hassel, Jerry Fitzpatrick and Oni Ovir

Also Present: Councillors Muhammad Ali, Clive Fraser, Stephen Mann and Gareth Streeter

Apologies: Councillor Joy Prince

PART A

22/21 **Disclosure of Interests**

There were no disclosures of interest made at the meeting.

23/21 **Urgent Business (if any)**

There were no items of urgent business.

24/21 **Call-In: Crystal Palace and South Norwood Low Traffic Neighbourhood**

The Chair of the Scrutiny & Overview Committee, Councillor Sean Fitzsimons introduced the Call-In of the 'Crystal Palace and South Norwood Low Traffic Neighbourhood' key decision. It was highlighted that two call-in requests had been received for this decision and although the Council's Constitution only allowed one call-in per decision, it had been agreed that the spokesperson for each call-in would be allowed to address the Committee to highlight the reasons for making the request.

The Chair explained the process for considering a call-in, confirming that the Committee needed to agree whether to review the decision and if it was decided to proceed, to confirm how much time it wished to allocate for the discussion of the item. The Committee agreed that it would review the decision and allocated two hours and thirty minutes for its consideration.

The Chair went on to explain that there were three outcomes the Committee could reach as a result of its review. These were:-

1. That no further action was necessary and the decision could be implemented as originally intended.
2. To refer the decision back to the Cabinet for reconsideration, outlining the nature of the Committee's concerns
3. To refer the decision to Council, if the Committee considered that the decision taken was outside of the Budget and Policy Framework.

At the outset of the item the Chair gave Councillors Stephen Mann and Gareth Streeter, as the spokesperson for their respective call-ins the opportunity to outline their concerns about the original decision.

Councillor Mann advised that he felt that a few amendments were required to the scheme in order to bring the community along. The current proposal had split the community, which in some cases had led to unacceptable abuse. There were long term road traffic issues in the area that the scheme was attempting to address, but consideration needed to be given to issues such as deliveries in the low traffic neighbourhood (LTN), what was the right amount of traffic in the zone and how to improve cross border communication.

Councillor Streeter advised that grounds for the call-in he had submitted looked at the fundamentals of the scheme, as it was perceived that the Council had not gathered enough evidence or could ever gather enough evidence to justify the scheme. Without this evidence, there was a worry that the scheme was fiscally motivated. Although, any money raised would be ring fenced, it meant that any money spent in a restricted way allowed other general funds to be spent elsewhere. In the next few months businesses would be reopening and there was a concern that the new scheme would deter people from visiting the shops at Crystal Palace.

Following the introduction to the call-in, the Council's Head of Highways and Parking, Mark Averill, delivered a presentation to the Committee setting out the reasons why the scheme was being implemented. A copy of the presentation can be found on the Council's website on the following link:-

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CIId=166&MIId=2599&Ver=4>

The Cabinet Member for Sustainable Croydon, Councillor Muhammad Ali, was also provided the opportunity to outline the reasons for implementing the LTN in South Norwood and Crystal Palace. The Committee was informed that it was important to recognise that Croydon had a road safety and air quality problem. A report produced on behalf of the Mayor of London had revealed that Croydon had the highest potential of all London boroughs to switch from car journeys to either walking or cycling. Research had found that 11 deaths per 100,000 in Croydon could be linked to the local air quality, with the borough having the highest rate of hospitalisation for children between 0-9 with asthma. Monitoring of air quality had found that the emissions on minor roads were almost equal to that of a-roads in the borough. There had also been clear recommendations from the Council's Climate Change Commission on the need to reduce car usage.

The scheme in Crystal Palace and South Norwood was the first phase of a wider programme of work to increase cycling and walking. The Council would also continue lobbying Government to invest in infrastructure across the borough, including extending the tram network and providing funding for a greener bus network. The Cabinet Member was keen to engage with the local community on the scheme during its experimental stage to ensure potential benefits could be maximised.

Following the introduction from the Cabinet Member, the Chair welcomed a number of external speakers, who had been invited to the meeting due to their interest in the scheme, with each speaker given the opportunity to present their perspective on the proposals. The first speaker was the Executive Member for Environment and Community Services at the London Borough of Bromley, Councillor William Huntington-Thresher. Councillor Huntington-Thresher advised the Committee that the previous temporary LTN had resulted in a negative impact on the north west of the borough of Bromley due to the increase in traffic it created. It was the ethos of Bromley to look to improve facilities for active travel, rather than working against other forms of travel and they looked to improve the flow on roads rather than limit the flow. The scheme in its current format was unlikely to be supported by Bromley residents.

The next speaker was the Assistant Director of Traffic & Parking from the London Borough of Bromley, Angus Culverwell, who advised the Committee that the impact of the temporary LTN on Bromley had been negative, judging from the amount of correspondence that had been received. There had also been an increase in congestion on the residential streets and the a-road to the north of the LTN. Bromley had its own active travel scheme and although the reasons for the LTN were understood, it was felt there were a number of issues that needed to be addressed. In light of the feedback from residents, it was the view of Bromley Council that the temporary scheme had not been as successful as Croydon would have liked. Going forward, Bromley Council would be happy to engage with Croydon about potential options and alternatives to the LTN.

Councillor Angela Wilkins, a Bromley Councillor whose ward bordered the LTN zone, advised that it was accepted that doing nothing, in the context of the climate emergency, was not an option, but at the same time doing the wrong thing was also unacceptable. Given the proximity of the scheme to Bromley, it should be viewed as a cross borough issue and as such needed to be developed on a cross-boundary basis. This should include Councillors working together to set strategic objectives followed by officers designing the technical scheme. At present, it was not clear there was a scheme available that would be acceptable to both authorities, but one could only be developed by both boroughs designing it together.

Miranda Bradley, from the Shape Better Streets campaign, addressed the Committee to highlight the benefits brought to the local neighbourhood from the original temporary LTN scheme in 2020. The Committee was advised that the introduction of the previous LTN had encouraged many residents to change their lifestyle and become more open to cycling and walking. The experimental scheme proposed was a good compromise and worked for local residents, while allowing access to roads within the LTN for those that needed it, such as carers and emergency service.

Eliska Finlay, from the Open Our Roads campaign, highlighted to the Committee that although the scheme aimed to increase active travel and reduce air pollution, as there was no baseline data available, it would not be possible to judge whether it had been successful. It was possible that the

scheme would increase the pollution on the roads around the boundary of the LTN and there was a risk that it could give the appearance of creating a private estate. As a result of the temporary LTN, traffic had increased on the Bromley roads closest to the boundary by 186%. It was not possible to determine the impact on the roads in Croydon as there was no baseline data. Given the lack of data, it was felt the experimental LTN could not quantifiably demonstrate its impact and as such the Committee was asked to refer the decision back to the Cabinet for reconsideration.

The final external speaker to address the Committee was Stephen Tabbener, who was also representing the Open Our Roads campaign. Mr Tabbener advised that as a Bromley resident on one of the roads neighbouring the proposed scheme and the owner of a business on the Croydon side of the scheme, it was his view that the scheme was not appropriate. The proposal risked creating a cul-de-sac with most of the access points on Bromley streets. As a local trader, there was also serious concern about how the scheme would impact upon the local economy, with it questioned whether there had been any impact assessment undertaken. If Croydon was committed to proper engagement with the local community in order to deliver a scheme that was agreeable for all, then the decision should be referred back to the Cabinet for reconsideration.

Following the representations made to the meeting, the Cabinet Member was given the opportunity to respond, confirming that the Administration was open to engaging with anyone affected by the scheme whether in Croydon or Bromley. It was reiterated that the scheme was originally a temporary one and was now moving to an experimental scheme. This would allow the Council to monitor its impact and identify possible improvements before making a final decision over whether to keep or remove the LTN. Importantly, it would also allow the Council to establish data specifically for Croydon. It was highlighted that the Council had used its learning from prior consultations to inform the process going forward, with a dedicated communications plan being created.

After the various submissions had concluded, the Committee was given the opportunity to ask questions on the LTN. The first question related to the boundary for the LTN and how it was decided upon. It was advised that the boundaries of an LTN would normally be a-roads. In this instance, the boundary also included the borough boundary with Bromley. If the LTN was to include the residential roads located across the boundary in Bromley, it would require the agreement of that local authority to participate in the scheme.

Given the location of the scheme on the borough border with Bromley it was questioned how the Council had engaged with Bromley Council during the development of the scheme. It was advised that when the temporary LTN had been extended, Croydon officers had reached out to Bromley officers about potential mitigation. Transport for London (TFL) had also facilitated meetings of both boroughs to discuss the scheme. The scheme presented to the Traffic Management Advisory Committee (TMAC) included mitigation and a monitoring system for Bromley. Ideally the two Councils would be working together on the LTN, but Croydon was able to notify Bromley of their decision to proceed, to which Bromley would have a month to respond. If there was

disagreement about the final scheme it would be down to the Greater London Authority (GLA) to make a final decision.

In response to a question about the maximum length an experimental traffic order could be in place, it was advised that the longest duration would be 18 months. It was decided by TMAC that the scheme in South Norwood and Crystal Palace would be limited to 12 months.

Echoing some of the previous comments made, concern was expressed that the scheme was being introduced after a period of significant disruption from the covid-19 pandemic and as such it would be extremely difficult to make an assessment on the success of the scheme.

It was confirmed that funding for the scheme came via two routes. One was the Active Travel Fund from central government and the other was from local transport funding. If the Council decided to delay the scheme to gather baseline data, then there was a risk that these funding sources would no longer be available.

It was suggested that from the information provided, the extent of the consultation with Bromley seemed to have been the minimum amount needed to meet legal requirements, when a more engaged approach may have been more successful. In response, it was advised that council officers had begun engagement on the concept in late 2019 through the Cyprus School with designed engagement with the community. A separate engagement event for the community had also been held at the Church Hall in the local area. This consultation had subsequently been overtaken by events arising from the pandemic, with advice from the Secretary of State for Transport to take urgent action.

As a follow up question, it was asked why it had been originally decided to use a temporary order in 2020, when an experimental order could have been used at that time. It was advised that many other London boroughs had been looking at introducing LTNs and had chosen either a temporary or experimental order. The legal advice given was that the LTN would not be introduced under natural conditions, due to the pandemic, so it was decided to use the temporary order made available by the Government. The Chair highlighted that when the Committee had considered traffic orders at a previous meeting, it had been in favour of the Council using experimental orders.

It was questioned whether further action would be taken going forward to reach a consensus with Bromley Council. It was advised that there was a hope that Bromley and Croydon officers would be able to work together to design appropriate mitigation and monitoring for the scheme. However, it may be difficult to achieve the approach preferred by Bromley in this particular location.

One Member of the Committee suggested that the approach taken to consultation may have been too rigid and it would be useful to have an engagement plan to map out future consultation on both a cross borough basis and with local community forums. It was agreed that a plan should be created for the project going forward.

In response to a question about how this particular scheme had been chosen, it was advised that action had been taken across the northern part of Croydon in response to the request from the Secretary of State for Transport, which had resulted in planters being installed. TFL had subsequently published its Streets Space Plan calling on local authorities to take action, which had included recommending pursuing LTNs. The scheme also helped to meet the priority of creating a cycling corridor in the north of the borough.

In response to a comparison made with another LTN scheme in Walthamstow, it was commented that as the Walthamstow scheme was three times the size of the one proposed for South Norwood and Crystal Palace, it was difficult to make a judgement on the potential benefits that may arise from the experimental scheme.

As it had been noted that Bromley Council was not in favour of road closures preferring instead to pursue other active travel measures, it was questioned how these different positions could be aligned. The Cabinet Member reiterated that he was happy to engage with Bromley to reach an understanding on how the scheme could be made to work for the residents of both boroughs.

Given Bromley Council's opposition to the LTN, it was questioned what alternatives schemes they were considering to boost active travel. It was advised that Bromley had introduced segregated cycle routes and the need to find the right solution for the right location was emphasised. In this instance, the negative impact upon Bromley residents had been too high. Bromley Council was happy to engage on possible schemes, but was not convinced about using the LTN as a start point.

In response to a question about what could be done to mitigate the impact of the scheme on the residential roads in Bromley directly affected by the LTN, it was advised that a filter would be needed to prevent vehicles accessing the LTN from the problem direction. It was highlighted that this did not need to be a physical closure.

It was questioned what criteria would be used to determine the success of the experimental scheme, for instance improved air quality or traffic reduction. It was advised that there was a need to be aware of the changing situation as lockdown was eased. There will be a need to ensure that the impact on the surrounding roads was taken into account, which would be managed through monitoring. However, there was a wide range of determinates that would be used to evaluate the success of the scheme including air quality, traffic congestions and road safety. Reducing car journeys was a key aim, but this interlinked with the other previously mentioned criteria. The Committee agreed that it would provide additional transparency to have clear criteria for determining the success of the experimental scheme, in place before it started.

As a follow-up, it was asked whether consideration had been given to gathering baseline data when the economy reopened and before the scheme commenced to ensure that there was a realistic data set available to provide a

more accurate comparison. It was advised that it may be difficult to get accurate data on pollution due to the shifting picture as the lockdown eased. Monitoring would start on Croydon roads as soon as possible after the meeting and the possibility of installing monitoring in Bromley would be explored.

In response to a question about the collection of qualitative data as well as quantitative data, it was advised that as part of the arrangements for the scheme, the Council was required to communicate on a local level throughout the lifetime of the experimental scheme. The feedback from this would be used to inform the final decision.

It was suggested that the scheme could be seen as appealing to middle class people living in the residential areas within the boundaries of the LTN at the expense of working class people who may live on the surrounding main roads. In response, it was highlighted that there were indications that LTN schemes benefitted people who were more disadvantaged, with the level of deprivation in an area being one of the data sets drawn upon by the TFL when considering schemes.

As a follow-up, it was suggested that consideration needed to be given to the potential negative impact on the air quality of the surrounding roads and whether any mitigation was needed if it deteriorated past a certain level. It was highlighted that the Council was committed to the levelling up approach outlined in the Mayor of London's Healthier Streets Strategy. Although the responsibility for main roads rested with different authorities, it was important to work together to reduce the impact of these changes.

In response to a question about what action the Mayor of London was taking to reduce traffic on main roads, it was advised that the Mayor had proposed a change to the boundaries for the Congestion Charge. The Mayor has also made it clear that he is seeking to pursue the healthy streets approach by giving over space for walking and cycling.

It was noted that there had previously been complaints about the level of signage used for the temporary scheme and as such it was questioned how this would be addressed in the experimental scheme. In response, it was highlighted that the signage used for the temporary scheme had complied with legislation and the Traffic Adjudicator had concluded that the Council's signage was correct. However, it would be ensured that there was sufficient signage in place on side roads to inform motorists of the LTN.

In response to a question about how any revenue raised by penalty charge notices for traffic offences would be used, it was confirmed that the funds were ring fenced for spending on either traffic improvements or traffic related measures, which in Croydon was spent on the freedom pass.

As a final question, it was asked whether anything could be done to prevent companies such as Google and GPS route finding systems using residential roads for shortcuts on their route finding apps. In response, it was highlighted that there had been indications that these apps had facilitated the growth of

traffic in London. However, as they were using public highways, it would require an intervention beyond Croydon Council to prevent these apps using residential roads. By implementing restrictions, such as the LTN, the roads within the zone were taken out of these maps.

Following the questions of the Committee, the Cabinet Member was given the opportunity to provide a final response, during which it was re-emphasised that both Croydon and London had significant air quality and road safety issues. The proposed experimental scheme allowed for a balanced approach, taking into account relevant exemptions and would be an opportunity to collect data and work with residents to improve the final outcome. The Cabinet Member also confirmed his commitment to meaningful engagement with residents and Bromley Council on both an officer and political level.

Before the Committee made its final deliberations on the outcome of the Call-In, the Chair reconfirmed the three options available, which were:-

1. That no further action was necessary and the decision could be implemented as originally intended.
2. To refer the decision back to the Cabinet for reconsideration, outlining the nature of the Committee's concerns*
3. To refer the decision to Council, if the Committee considered that the decision taken was outside of the Budget and Policy Framework.

During the final deliberation by the Committee, it was recognised that the proposed LTN was proving to be divisive in the local community and that legitimate concerns had been raised by the external speakers, which the Committee agreed required additional clarification. These concerns included the need to have baseline data and clear criteria in place to be able to judge the success of the LTN, the need to engage with Bromley Council to identify appropriate mitigation for the neighbouring roads in Bromley, the need to have an engagement strategy and the need to be monitoring the impact of the LTN on the air quality in the areas bordering the scheme. However, it was also acknowledged that it would not be unreasonable to pursue the scheme as an experiment, particularly given the need to take action to address the climate emergency.

It was concluded that as the decision taken was within the Council's Budget and Policy Framework, it would not be referred to Council for further consideration. However, as the Committee had a number of concerns relating to the delivery of the experimental order it would refer the decision to the decision maker to give consideration to these concerns. It was also concluded that requests would be made for two updates to be provided to the Streets, Environment & Homes Sub-Committee. One prior to the start of the experiment to provide an update on the response to the concerns raised by the Committee. A second update was requested to be given upon completion of the experiment on the outcomes from the experiment.

As the Committee originally concluded that it would refer the decision to the decision maker for reconsideration, which was not an option available under the procedure for call-ins in the Council's Constitution, the meeting was

reconvened on 20 May 2021 to confirm the decision. At the reconvened meeting the Committee agreed that it would refer the decision to the Cabinet for reconsideration based on the concerns outlined below.

RESOLVED: The Committee agreed to refer the decision to the Cabinet for reconsideration based on the following concerns:-

1. The Committee was concerned that the lack of clarification on the baseline data sources to be used for the experiment would make it difficult to quantifiably demonstrate the potential benefits arising from the experiment to the local community. As such that further work was needed to identify and refine the quantifiable data sources that would be used for the project. Additionally, in order to build public trust, confirmation of these data sources had to be made publicly available, prior to the start of the experiment in South Norwood & Crystal Palace.
2. The Committee was concerned that it would be difficult for the public to have confidence in the benefits arising from the experiment without clearly defined success criteria. As such urgent work was needed to define a framework by which the success of the scheme would be assessed. This needed to be completed and made publicly available prior to the start of the experiment in South Norwood & Crystal Palace.
3. The Committee was concerned about the potential impact the experiment may have upon the roads surrounding the LTN, particularly in regards to air quality. As such any monitoring installed as part of the experimental scheme needed to include the wider area. Additionally, given the potential negative impact on the air quality in the surrounding roads, mitigation needed to be identified as a matter of urgency, should there be a significant deterioration in air quality.
4. The Committee was concerned that the level of engagement with Bromley Council to date had not resulted in an agreed way forward for the experiment, which was likely to result in a detrimental impact for those Bromley residents living closest to the scheme. As such further engagement with the London Borough of Bromley needed to be prioritised, to ensure that the appropriate mitigation was in place before the start of the experiment.
5. Although reassurance was given about the level of consultation that would be undertaken throughout the experiment, it was agreed that the engagement strategy for the Crystal Palace & South Norwood LTN project needed to be made publicly available as soon as possible.
6. In light of concerns raised about during the meeting about the level of signage used during the previous temporary scheme, there needed to be an ongoing review of the signage used during the life of the experimental scheme.
7. The Committee had a concern that it would be difficult to reduce congestion on residential roads while route-finding apps continue to

include these roads as potential route options for motorists. As such the Committee would ask the Cabinet Member for Sustainable Croydon to give a commitment to working with other London boroughs to address the issue of route finding apps directing motorists through residential streets.

8. In light of the above concerns, it is requested that the Cabinet Member for Sustainable Croydon provides two updates to the Streets, Environment & Homes Sub-Committee. Firstly, before the start of the experiment to provide a response to the concerns of the Scrutiny & Overview Committee. Secondly, at the conclusion of the experiment to provide an update on the outcomes.

25/21 **Exclusion of the Press and Public**

This motion was not required.

The meeting ended at 10.38 pm

Signed:

.....

Date:

.....

REPORT	CABINET 7 June 2021
SUBJECT:	RESPONSE TO CALL-IN REPORT: CRYSTAL PALACE & SOUTH NORWOOD LOW TRAFFIC NEIGHBOURHOOD RESPONSE TO THE CONCERNS OF THE SCRUTINY AND OVERVIEW COMMITTEE
LEAD OFFICER:	Sarah Hayward – Interim Executive Director, Place Steve Iles – Director, Public Realm
CABINET MEMBER:	Councillor Muhammad Ali - Cabinet Member for Sustainable Croydon
WARDS:	Crystal Palace & Upper Norwood and South Norwood

SUMMARY OF REPORT:

This report responds to concerns raised by the Scrutiny and Overview Committee (the Committee) following its consideration of the Key Decision to implement an Experimental Low Traffic Neighbourhood (LTN) at Crystal Place and South Norwood. It also summarises some of the considerations set out in the report to the Traffic Management Advisory Committee (TMAC) in January, and the subsequent addendum report to the February meeting. It provides updates where guidance has been newly published or updated, and where relevant research findings have been published since those meetings.

POLICY CONTEXT/AMBITIOUS FOR CROYDON:

The Key Decision (that was the subject of the Call in) addresses the Council's Corporate Plan priorities:

- Easy, accessible, safe and reliable, making it more convenient to travel between Croydon's local places
 - Less reliance on cars, more willingness to use public transport, walk and cycle and
 - Invest in safe cycle lanes between central Croydon and local centres
- and priorities in the Climate Change report and the resulting declaration of a 'Climate Emergency', priorities including: Croydon Council become carbon neutral by 2030;
- Work with the Mayor of London to meet the aim for London to be a zero-carbon city by 2050;
 - Work with communities across Croydon to ensure that all residents and businesses are empowered and encouraged to play their part in making the Croydon the most sustainable borough in London;
 - Role of all elected Members in leading this agenda.

FINANCIAL IMPACT:

There is no impact on the General Fund as this scheme is to be funded by external LIP funding and the carryover of Active Travel Funding from 2020-21.

KEY DECISION REFERENCE NO.: 6520SC

1. RECOMMENDATIONS

- 1.1 The Cabinet is asked to consider this report in the light of the Decision in report 11a on the agenda, and the concerns of the Scrutiny and Overview Committee set out in that report.

2. CONSIDERATIONS WHEN DECIDING TO IMPLEMENT AN EXPERIMENTAL TRAFFIC ORDER AND THE SCRUTINY AND OVERVIEW COMMITTEE'S CONCERNS REGARDING CERTAIN CONSIDERATIONS AND OTHER MATTERS

Summary and Update on Matters in the Reports to TMAC

- 2.1 The January report to TMAC drew on Guidance to local authorities issued by the DfT in May 2020 (as amended in November). The Guidance has since been further updated (25th February 2021)¹. In his Forward to the further updated Guidance, the Secretary of State continues to draw out the transport (and health and environment related) lessons from the Covid19 Pandemic. He highlights how the initial lockdown '*resulted in cleaner air and quieter streets, transforming the environment in many of our towns and cities*' and that '*millions of people discovered, or rediscovered, cycling and walking*'. He emphasises '*We need people to carry on cycling, and to be joined by millions more*' and that '*According to the National Travel Survey, in 2017-18 over 40% of urban journeys were under 2 miles – perfectly suited to walking and cycling.*'
- 2.2 The January report to TMAC set out the considerations when taking a decision as to whether to make an experimental traffic order to implement an Experimental LTN at Crystal Palace and South Norwood (considerations expanded on in the February addendum report). The recommended experimental traffic order would be made under Section 9 of the Road Traffic Regulation Act 1984. In exercising its powers under the Act, the Council is required, (by s122 of the Act), 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 street, whilst at the same time having regard to the following considerations:
 - 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;
 - air quality (and specifically the National Air Quality Strategy prepared under section 80 of the Environment Act 1995);

¹ <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>

- 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 Council to be relevant.

2.3 The matters relevant to the taking of the Decision set out in the January report, include 'Health'. Inactivity is having profound health effects and is a major contributory factor to the levels of obesity in Croydon. On the 18th May 2021 NHS Digital reported that admissions to NHS hospitals where obesity was a factor, exceeded one million for the first time in 2019/20². An increase of 17% on 2018/19. Nationally, just as in Croydon, obesity is an equalities issue with admissions directly attributable to obesity being over three times more likely in the most deprived areas compared to the least deprived.

2.4 'Environment' linked to health and inequality were other matters addressed in the TMAC reports. The January report explained that the approach of both central government and the Mayor of London to reducing road transport emissions of locally important pollutants and globally harmful CO₂, is to:

- reduce reliance on the private car and other motorised transport including through the encouragement of active travel
- reduce harmful emissions from the remaining vehicles.

It also explained that whilst advances in vehicle propulsion technology are reducing harmful emissions from each vehicle, on Croydon's and London's streets there are important trends working against this positive effect. From 2009 to 2019, traffic on London's streets increased to its highest ever at 22.6 billion vehicle miles. The increase in vehicle miles has been entirely on London's unclassified roads / minor streets. Traffic on the unclassified minor roads almost doubled between 2009 and 2019, reaching the point where London's minor roads/streets are carrying almost as much traffic as its A Road network. The February addendum report to TMAC summarised research published in January (commissioned by the GLA and TfL) into the air quality effects of implementing Mayoral policies. UCL research into systemic inequalities in indoor air pollution exposure in London³ has since been published. Its findings include:

- Exposure to indoor air pollution can lead to health inequalities depending on socio-economic status. Differences in housing quality and characteristics of the surrounding areas mean low-income households are likely to bear a disproportionate risk of elevated exposure to indoor air pollution.
- Members of low socio-economic status groups are more likely to spend less time outdoors, due to a variety of factors including higher levels of unemployment, fewer after-school clubs and little access to green spaces. This raises their susceptibility to developing health conditions from increased exposure to indoor air pollution

²² <https://digital.nhs.uk/data-and-information/publications/statistical/statistics-on-obesity-physical-activity-and-diet/england-2021>

³ <https://journal-buildingscities.org/article/10.5334/bc.100/>

and supports the statement in the January TMAC report that small particulate matter (PM_{2.5}) is no respecter of boundaries or major or minor streets, the report stating that the whole LTN Area (streets both within and around it) were above World Health Organisation guideline limits.

- 2.5 In late March TfL issued two sets of interim guidance:
- 'Interim Guidance for Delivery Using Temporary and Experimental Schemes'⁴ and
 - 'Interim Monitoring Guidance for Boroughs'⁵

These do not affect the recommendation to implement an Experimental LTN. Rather, they encourage and help good practice in implementing and operating such an experiment. The first of the above interim guidance notes addresses several of the concerns raised by the Scrutiny and Overview Committee. In particular it addresses:

- **Monitoring of Experimental Schemes** including preparing a monitoring plan which includes objectives against which the success of the scheme will be assessed and the data to be used to measure success, referring the reader to the second of the above interim guidance notes for further advice and guidance.
- **Consultation**, including guidance on the preparation and implementation of a consultation and engagement plan.
- **Proposals affecting traffic on roads/streets in another borough**; in particular TfL's statutory role in the process, the relevant part of TfL to engage with, and when and how to engage.

Scrutiny and Overview Committee's Concerns

- 2.6 Upon Call-in, implementation of the Key Decision was halted. Consequently the activity, planning and research to provide full answers to the Committee's concerns has yet to be concluded (but will be in a matter of weeks, should the Key Decision be confirmed). As requested by the Committee, fuller information would be provided to the Streets, Environment and Homes Scrutiny Sub-Committee in an update to the Sub-Committee, prior to the coming into operation of the proposed Experimental LTN. The following section of this report addresses each of the Committee's concerns.

Monitoring

Concern 1. The Committee was concerned that the lack of clarification on the baseline data sources to be used for the experiment would make it difficult to quantifiably demonstrate the potential benefits arising from the experiment to the local community. As such that further work was needed to identify and refine the quantifiable data sources that would be used for the project. Additionally, in order to build public trust, confirmation of these data sources had to be made publicly available, prior to the start of the experiment in South Norwood & Crystal Palace.

⁴ <https://content.tfl.gov.uk/interim-guidance-for-delivery-using-temporary-and-experimental-schemes-march-2021.pdf>

⁵ <https://content.tfl.gov.uk/interim-monitoring-guidance-march-2021.pdf>

- 2.7 **Response 1.** The January report explained how planned traffic surveys were cancelled due to the first COVID19 Lockdown (and the resulting dramatic change in travel behaviour). Consequently, (in order to assess the effects of the series of temporary interventions implemented over the previous summer (interventions that became the 'Temporary LTN'), against a pre COVID19 'baseline'), consultants were commissioned to use data derived from in-vehicle telematics to paint a picture of traffic in the area pre-COVID19. The consultants also employed TfL iBus (journey time and reliability) data to further provide an indication of changes before and during the period of what became the Temporary LTN. They also used the most recent modelling of London's air quality (2016) mapping concentrations of Nitrogen Dioxide (NO₂), and particulate matter. TfL undertook its own study using iBUS and SCOOT data (drawn on within and appended to the January report).
- 2.8 Para 3.15 of the January report summarised the reasons for recommending implementing an Experimental LTN. In doing so, it states that Croydon officers should seek to agree a monitoring strategy with Bromley Council and TfL. Whilst implementation of the Key Decision has been halted, there has been one meeting with TfL regarding potential monitoring. It has been agreed that a joint monitoring strategy is to be developed with clear objectives. It is expected that this will in part employ TfL's 'Surface Intelligent Transport System' ('Surface Digital Twin') which incorporates a series of real time data sets including, iBus, SCOOT and INRIX (vehicle flow, speed etc on 60,000 links on London's principal road network and bus network) going back to before the COVID19 Pandemic. The monitoring strategy will follow TfL's 'Interim Monitoring Guidance for Boroughs'. It will be guided by the monitoring activity for schemes suggested by TfL (as summarised in Table 1 of the interim guidance (see below)) and TfL's 'Interim Guidance for Delivery Using Temporary and Experimental Schemes'.

Table 1 – Suggested monitoring activity for schemes

Examples of monitoring activity	New cycle lanes and wider pavements	Space for active travel in town centres and interchanges	Low-traffic neighbourhoods	School streets
All-vehicle traffic counts	✓ Link counts	✓ Cordon counts	✓ Cordon counts	✓ Cordon counts
Pedestrian and cycle counts	✓ Link counts	✓ Cordon counts	✓ Cordon counts	✓ ⁴
Pedestrian comfort evaluation	✓	✓	✓	✓
Individual surveys	✓ User	✓ User	✓ Resident	✓ Pupil, parent/carer and/or resident
Business surveys	✓	✓	✓	✗
Traffic speeds	✓	✓	✓	✓
Parking counts (car and cycle)	✗	✓	✗	✓
Bus speeds/journey times	✓	✓	✓	✗
Safety data	✓	✓	✓	✓
Penalty Charge Notices issued	✗	✗	✓	✓
Air Quality	✓	✓	✓	✓
Review of ongoing public feedback	✓	✓	✓	✓
Ongoing liaison with emergency services	✓	✓	✓	✓

2.9 Timescales are such that an Experimental LTN could not be implemented before the 21st June, the date central government hopes to be in a position to remove all COVID19 related legal limits on social contact. This would allow monitoring to be undertaken prior to the implementation of an Experiment LTN which will provide a new 'post COVID19' baseline. However, it is not known how long it might take for people's travel behaviours to stabilise to a post COVID19 'new normal'. (Concern 1 is further addressed in the response to Concerns 2 and 3).

Success Criteria

Concern 2. The Committee was concerned that it would be difficult for the public to have confidence in the benefits arising from the experiment without clearly defined success criteria. As such urgent work was needed to define a framework by which the success of the scheme would be assessed. This needed to be completed and made publicly available prior to the start of the experiment in South Norwood & Crystal Palace.

2.10 **Response 2.** The January report explained that a Low Traffic Street is a High People Street. LTNs/Healthy Neighbourhoods seek to create calmer and quieter street space where people can choose to travel actively/healthily and where the street's traditional function of community and social space can be

reclaimed, all with the aim of supporting physical and psychological health and wellbeing. Hence success will be measured by the degree to which vehicular traffic levels, traffic speeds and casualty numbers (and severity) are all reduced and numbers of people in the streets, and active travel have increased. This will be balanced with other matters of importance including the journey time and reliability of bus services on the neighbouring A Roads and the vitality of the Upper Norwood Triangle. The indicators of success will be set out in the monitoring strategy to be developed with TfL and ideally neighbouring local authorities, principally Bromley. The focus will be on finalising the monitoring strategy swiftly. In turn, the detail regarding the monitoring strategy will be provided to the Streets Environment and Homes Scrutiny Sub-Committee in the up-date to the Sub-Committee.

Whilst published during and focussed on the third COVID19 Lockdown, TfL's 'Interim Guidance for Delivery Using Temporary and Experimental Schemes' suggests schemes objectives equally appropriate post Lockdown:

- **Improved safety** for all users and reduced fear of road danger especially for active modes,
- **Enabling cycling and walking** through a pleasant and good quality experience, encouraging active travel and preventing a car-based recovery
- **Reliable and efficient bus operations**, schemes should make every attempt not to impact bus operations
- **Essential traffic not impacted unreasonably**, allowing for freight, emergency services and those journeys which can only take place by private car, taxi or PHV to reach their destinations in a timely manner
- **The public and businesses not disproportionately affected** by experimental schemes including not adversely impacting groups with protected characteristics

2.11 The same interim guidance importantly reminds local authorities that monitoring against clear objectives is not only to gauge success at the end of an experiment. Monitoring should also inform on going management and adjustment related to the operation of the experiment. An example TfL gives is assessing the need to adjust traffic signal timings, something important to assess in relation to the A Roads bounding the proposed Experimental LTN.

Potential Wider Effects

Concern 3. The Committee was concerned about the potential impact the experiment may have upon the roads surrounding the LTN, particularly in regards to air quality. As such any monitoring installed as part of the experimental scheme needed to include the wider area. Additionally, given the potential negative impact on the air quality in the surrounding roads, mitigation needed to be identified as a matter of urgency, should there be a significant deterioration in air quality.

2.12 **Response 3** The specification for the equipment (and the locations for that equipment) with which to continuously record traffic flow (by vehicle type, including people on bikes and walking, and vehicle speeds), has been developed with monitoring consultants. The sites identified are within the area

of the proposed Experimental LTN and the A Roads bounding it within Croydon, including the Upper Norwood Triangle. This is in addition to the real time data / monitoring available via TfL's 'Surface Intelligent Transport System' ('Surface Digital Twin'). Locations for additional monitoring equipment have not yet been proposed in Bromley (see the response to Concern 4 below).

- 2.13 TfL's 'Interim Monitoring Guidance for Boroughs' advises that 'Air quality monitoring should only be considered where there is likely to be a significant impact on emissions. A significant impact on emissions is not anticipated from this one experiment. However, monitoring of air quality will be undertaken, reflecting the importance attached to the matter of air quality, by both the public and the Committee.
- 2.14 Consultants have been engaged to advise on and implement the monitoring of air quality effects potentially arising during the Experimental LTN. It is planned to deploy a combination of portable sensors and 'passive' diffusion tubes in and around the Experimental LTN.
- 2.15 Important caveats need to be attached to the monitoring and assessment of potential air quality effects. The report of the Air Quality Expert Group 'Assessing the Effectiveness of Interventions on Air Quality' (prepared for DEFRA (2020))⁶ states that in terms of air quality and health effects '*The assessment of interventions can be challenging for several reasons*'. It suggests an 'accountability chain' approach may provide a useful way to consider the impact of an intervention, from a change in activity through to potential health effects i.e. activity →emissions →concentrations →health outcomes. However it warns that effects become increasing difficulty to assess/quantify as one moves along the 'chain':
- 2.16 Mitigation is intended to be provided directly via the implementation of the Experimental LTN itself, the LTN providing quieter and calmer street space in which people can choose to cycle and walk short journeys. Mitigation relating to air quality concerns is also expected to be provided by the changes to the London wide Low Emission Zone and the expansion of the Ultra-Low Emission Zone. Further mitigation will be investigated. The outcome which will be included in the update to the Streets, Environment and Homes Scrutiny Sub-Committee. Mitigation by changes to traffic signal trimmings on the surrounding A Road network, would be kept under constant review and adjustment with TfL during the experiment.

Bromley Council

Concern 4. The Committee was concerned that the level of engagement with Bromley Council to date had not resulted in an agreed way forward for the experiment, which was likely to result in a detrimental impact for those Bromley residents living closest to the scheme. As such further engagement with the London Borough of Bromley needed to be

⁶ https://uk-air.defra.gov.uk/assets/documents/reports/cat09/2006240803_Assessing_the_effectiveness_of_Interventions_on_AQ.pdf

prioritised, to ensure that the appropriate mitigation was in place before the start of the experiment.

2.17 **Response 4.** The January report to TMAC advised that:

- Bromley Council had, in the strongest terms, called for the previous temporary measures to be removed, indicating that it would only talk with Croydon Council once the Temporary LTN was removed.
- TfL had however, facilitated an officer level discussion between Bromley and Croydon Councils, officers having met twice.

The January TMAC meeting was advised of a letter sent (just prior to the TMAC meeting) from the Bromley Council Chief Executive. It stated Bromley Council's position, namely that the Temporary LTN should be removed directly, and the Experimental LTN should not be implemented until any potential effects on air quality are known⁷.

2.18 The Key Decision was taken in two stages, the first stage of the Decision being to remove the Temporary LTN. In taking the first part of the Decision, the Cabinet Member for Sustainable Croydon resolved to request additional information and questions be put to TMAC. Including:

*'e) **Engagement with the London Borough of Bromley** Officers to report to TMAC on a regular basis to allow for the updating of the committee as we work together with Bromley to progress the scheme.'*

The officer report to February TMAC confirmed that officers would report to TMAC on a regular basis, updating the Committee on the work with Bromley and other neighbouring Highway and Traffic Authorities (including TfL) to progress the Experimental LTN. The Key Decision before Cabinet includes:

'Instruct officers to continue to seek to work with those in Bromley Council to mitigate effects predicted to arise from the Experimental LTN in certain residential access streets in Bromley and to address concerns about potential effects on air quality.'

2.19 The March meeting of the Scrutiny and Overview Committee was addressed by:

1. The Executive Member for Environment and Community Services at Bromley Council, who explained that it was the ethos of Bromley to look to improve facilities for active travel, rather than working against other forms of travel and they looked to improve the flow on roads rather than limit the flow, and that the proposed scheme in its current format was unlikely to be supported by Bromley residents.
2. The Assistant Director of Traffic & Parking at Bromley Council, who advised the Committee that the impact of the Temporary LTN on Bromley had been negative but that going forward, Bromley Council would be happy to engage with Croydon about potential options and alternatives to the LTN.
3. A Bromley Councillor for Crystal Palace ward, advised that given the proximity of the proposed scheme to Bromley, it should be viewed as a cross borough issue and as such needed to be developed on a cross-

⁷ letter provided to the decision taker and appended to the Key Decision Notice

boundary basis. This should include Councillors working together to set strategic objectives followed by officers designing the technical scheme. At present, it was not clear there was a scheme available that would be acceptable to both authorities, but one could only be developed by both boroughs designing it together.

(Draft Minutes of the Meeting of the Scrutiny and Overview Committee 23 March 2021)

- 2.20 Engagement with Bromley is likely to benefit from the continuing involvement of TfL. The involvement of TfL will be important for a number of reasons. The January report advised that under S121B of the Road Traffic Regulation Act 1984 (RTRA 1984), a London local authority may not implement a traffic regulation order (including an experimental order) if to do so will affect, or is likely to affect a road in another borough, unless:
- it has notified TfL and the other local authority; and
 - the proposal has either (a) been approved by the other local authority; (b) received no objection within one month from the other local authority; (c) any objection has been withdrawn; or (d) the GLA has given its consent after consideration of the objection.

As well as TfL being the body to be notified, the GLA is most likely to take advice from TfL in deciding whether or not to consent to the making of the experimental traffic order.

- 2.21 It is proposed that the reengagement with Bromley Council be based around the point highlighted by the Scrutiny and Overview Committee:
- 'a benefit of using Experimental Traffic Orders is that they enable the Council to carry out iterative testing. This allowed the Council to gather data to establish the extent to which any such scheme positively contributed towards either reducing car usage or improving air quality in the borough.'*

whilst also:

- emphasising the temporary nature of the experiment
- encouraging Bromley Council to be a part of the development of the monitoring strategy and the engagement strategy
- seeking to work together to protect residential / local access streets in Bromley at the edge of the proposed Experimental LTN, from predicted displaced / diverting traffic.

Regarding the latter point above, TMAC heard evidence from a representative of Milestone Road (Bromley) residents (and residents of neighbouring/linked access streets in Bromley) regarding the street/traffic environment and driver behaviour they had experienced following the temporary restriction on motor vehicles introduced in Fox Hill, Stambourne Way and Sylvan Hill creating the Temporary LTN. The residents were particularly concerned to highlight road rage incidents witnessed in their streets in early December 2020. Similarly a representative of Southern Avenue (South Norwood) residents described the street/traffic environment and driver behaviour they had experienced over many years, and the relief provided by the Temporary LTN. A key objective of

any scheme promoted at this location should be 'Healthy Low Traffic Access Streets', be they in Bromley or Croydon boroughs.

- 2.22 Officers further propose offering to work with Bromley Council to undertake feasibility testing of alternative proposals Bromley might suggest. The results of this feasibility potentially being provided to Public Inquiry (see Response to Concern 5) were one to be held.

Engagement Strategy

Concern 5 Although reassurance was given about the level of consultation that would be undertaken throughout the experiment, it was agreed that the engagement strategy for the Crystal Palace & South Norwood LTN project needed to be made publicly available as soon as possible.

- 2.23 **Response 5** The drafting of the engagement strategy will be finalised (ideally with the involvement of Bromley Council), and the Streets, Environment and Homes Scrutiny Sub-Committee updated. The engagement strategy will be guided by TfL's 'Interim Guidance for Delivery Using Temporary and Experimental Schemes'
- 2.24 The Call-in of the Key Decision suggested consideration be given to 'staging a Citizens Assembly on the LTN and the delivery of the Fresh Air Suburb'. The RTRA 1984 allows the holding of a Public Inquiry before the making of a traffic order. It similarly allows the GLA to call a public inquiry before deciding whether to consent to the making of a traffic order by one authority, potentially affecting another authority's roads (in the event of an otherwise unresolved objection). If, in the light of experiment, the experiment is potentially to be made permanent, then the holding of a Public Inquiry (potentially with the GLA) prior to the making of a permanent traffic order, is probably the more appropriate mechanism, and would be given careful consideration (including with the GLA as necessary). There may well be a role for a Citizens Assembly to consider in broader terms, the means by which the Fresh Air Suburb might be remade.

Traffic Signs

Concern 6. In light of concerns raised during the meeting about the level of signage used during the previous temporary scheme, there needed to be an ongoing review of the signage used during the life of the experimental scheme.

- 2.25 **Response 6.** The signing strategy will seek to ensure that motorists on the boundary roads are advised / reminded that restrictions are in place on the roads that form the entrance to the Experimental LTN or within it. The strategy will be more effective if it can be implemented on boundary roads and other streets in Bromley, with the agreement of Bromley Council. All mandatory signing for the scheme will be in accordance with the Traffic Signs Regulations and General Directions 2016. The advisory signing warning of the restrictions ahead would be subject to ongoing review during the period of

operation of the Experimental LTN, public feedback on the legibility etc of the signing, being an important part of the review.

Route Finding Apps

Concern 7. The Committee had a concern that it would be difficult to reduce congestion on residential roads while route-finding apps continue to include these roads as potential route options for motorists. As such the Committee would ask the Cabinet Member for Sustainable Croydon to give a commitment to working with other London boroughs to address the issue of route finding apps directing motorists through residential streets.

- 2.26 **Response 7** Whilst the frustrations of residents living in local access streets, and the concerns of the Committee are fully acknowledged, there is no unilateral action Croydon Council can take to prevent mobile apps routing vehicles down inappropriate streets. Officers will pursue the matter with other London local authorities including via London Councils and the London Technical Advisers Group (LoTAG).

Reporting Back

Concern 8 In light of the above concerns, it is requested that the Cabinet Member for Sustainable Croydon provides two updates to the Streets, Environment & Homes Sub-Committee. Firstly, before the start of the experiment to provide a response to the concerns of the Scrutiny & Overview Committee. Secondly, at the conclusion of the experiment to provide an update on the outcomes.

- 2.27 **Response 8** Updates will be provided to the Streets, Environment & Homes Sub-Committee. Consideration will be given as to the form of update in the light of the frequency/infrequency of meetings of the Sub-Committee over the summer. Similarly the previously confirmed reporting to TMAC on a regular basis, will be reviewed in the light of the updating of the Sub-Committee.

3. CONSULTATION

(See Response 5 above plus the [January 2021 TMAC Report](#) and the [February 2021 Addendum Report](#))

4. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 4.1 The Financial Impact summary at the start of the January TMAC report stated that costs arising from implementing, consulting on and monitoring the Experimental LTN are proposed to be met from Active Travel Funding provided to London by the Secretary of State for Transport (via TfL), and from funding allocated to Croydon Council by TfL to support the Council to implement its Local Implementation Plan. The 'Finance and Risk Assessment Considerations' section of the report advised that TfL had confirmed that Active Travel Funding (provided by the DfT and administered by TfL) is

available to Croydon Council for 2020/21, but with the flexibility of being able to carry funding into this year for delivery, if schemes are committed in 2020/21. It advised that the request had been made to TfL to use Active Travel Funding, with LIP Corridors funding for design, implementation, consultation and monitoring costs arising from the recommended Experimental LTN, to which TfL had agreed. It also advised that the recommendation / decision to implement the Experimental LTN order is subject to Spending Control Panel agreeing the expenditure of the ring-fenced grant funding. Whilst the Council is no longer subject to S114, the Spending Control Panel and the requirement for it to approve expenditure, remain in place.

- 4.2 The 'Risks' subsection of the January report advised that:
- significant delay to making the experimental traffic order is likely to impact on the ability to spend all of the TfL and DfT funding allocated to the project for 2020/21.
 - removal of the Temporary LTN is intended to allow discussion with Bromley Council regarding the recommended Experimental LTN and reduce the risk around making of the traffic order and financial risk potentially associated with delay.
- 4.3 The 'Finance and Risk Assessment Considerations' section of the February Addendum report advised revision of the Equality Analysis had resulted in a slight change to the proposed Experimental LTN predicted to increase the project cost by approximately £25,000. Meeting this additional cost to be included within the Council's ask to TfL when seeking release of LIP Funding for 2021/22.
- 4.4 TfL remains reliant on funding from central government. The funding agreement concluded with central government in March, extended TfL's funding until the 18th May 2021. As a consequence TfL advised local authorities that LIP funding would only be provided until 18th May. TfL has since written to the local authorities advising LIP funding will be extended until 28th May. It is anticipated that LIP funding will be provided for the remainder of the year, but as yet, is not confirmed. However, the control will remain in place (as stated in the recommendation to TMAC and Key Decision) that implementation of an Experimental LTN at Crystal Palace and South Norwood is subject to Spending Control Panel agreeing to the spending of ring fenced grant funding.

Approved by: Geetha Blood, Interim Head of Finance, Place and Resources on behalf of S151 Officer

5. LEGAL CONSIDERATIONS

(See the [January 2021 TMAC Report](#) and the [February 2021 Addendum Report](#), plus the Legal Considerations set out in the main report bringing the Key Decision to Cabinet).

6. HUMAN RESOURCES IMPACT

(See the [January 2021 TMAC Report](#))

7. EQUALITIES IMPACT

(See the [January 2021 TMAC Report](#) and the [February 2021 Addendum Report](#), plus the updated Equalities Analysis at appendix 3 to the Addendum Report)

8. ENVIRONMENTAL IMPACT

8.1 (See the [January 2021 TMAC Report](#) and the [February 2021 Addendum Report](#) plus the additional information in Section 1 of this report)

9. CRIME AND DISORDER REDUCTION IMPACT

9.1 (See the [January 2021 TMAC Report](#))

10. HEALTH IMPACT

10.1 (See the [January 2021 TMAC Report](#) plus the additional information in Section 1 of this report)

11. HUMAN RIGHTS IMPACT

11.1 (See the [January 2021 TMAC Report](#))

12. DATA PROTECTION IMPLICATIONS

12.1 (See the [January 2021 TMAC Report](#))

CONTACT OFFICER: Ian Plowright, Head of Transport

BACKGROUND DOCUMENTS: Letter from TfL Head of Network Sponsorship, Investment Delivery Planning - Surface Transport. 18th May 2021.

REPORT TO:	CABINET 7th JUNE 2021
SUBJECT:	INVESTING IN OUR BOROUGH
LEAD OFFICER:	RACHEL SONI, INTERIM DIRECTOR OF COMMISSIONING & PROCUREMENT ASMAT HUSSAIN, INTERIM EXECUTIVE DIRECTOR OF RESOURCES
CABINET MEMBER:	COUNCILLOR CALLTON YOUNG CABINET MEMBER FOR RESOURCES AND FINANCIAL GOVERNANCE
WARDS:	ALL
CORPORATE PRIORITY/POLICY CONTEXT	
<p>Effective outcome based commissioning and prudent financial transactions contribute to all corporate priorities.</p> <p>The Council's Commissioning Framework (2019 – 2023) sets out the approach to commissioning and procurement and puts delivery of outcomes at the heart of the decision making process. As the Council develops more diverse service delivery models, it is important to ensure that our contractual and partnership relationships are not only aligned to our corporate priorities but also represent value for money for Croydon residents and Council taxpayers.</p>	
FINANCIAL SUMMARY: Financial implications are set out in each individual report.	
KEY DECISION REFERENCE NO.:	
There are key decisions mentioned in this report, but approval of the Recommendations would not constitute a key decision.	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1 RECOMMENDATIONS

1.1 The Cabinet is requested to note:

1.1.1 The request for approval of the Best Start Suite of Contracts extension period of 4 months as set out at agenda item 12a and section 5.1.1.

1.1.2 The contracts between £500,000 and £5,000,000 anticipated to be awarded under delegated authority from the Leader by the nominated Cabinet Member, in consultation with the Cabinet Member for Resources and Financial Governance and with the Leader in certain circumstances, before the next meeting of Cabinet, as set out in section 5.2.1.

1.1.3 The list of delegated award decisions made by the Director of Commissioning and Procurement, between 07/04/2021 – 17/05/2021, as set out in section 5.2.2.

2 EXECUTIVE SUMMARY

2.1 This is a standing report which is presented to the Cabinet, for information, at every scheduled Cabinet meeting to update Members on:

- Contract awards and strategies to be agreed by the Cabinet at this meeting which are the subject of a separate agenda item;
- Contracts between £500,000 and £5,000,000 anticipated to be awarded under delegated authority from the Leader by the nominated Cabinet Member, in consultation with the Cabinet Member for Resources and Financial Governance and with the Leader in certain circumstances, before the next meeting of Cabinet;
- Delegated contract award decisions made by the Director of Commissioning and Procurement 07/04/2021 – 17/05/2021;
- Delegated contract award decisions under delegated authority from the Leader by the Cabinet Member for Children, Young People and Learning in consultation with the Cabinet Member for Resources and Financial Governance related to the Health and Social Care Services - DPS 3 Lot 3 – Young People Semi Independent Accommodation;
[As at the date of this report there are none]
- Property lettings, acquisitions and disposals agreed by the Cabinet Member for Resources and Financial Governance in consultation with the Leader since the last meeting of Cabinet;
[As at the date of this report there are none]
- Delegated contract award decisions under delegated authority from the Leader by the Cabinet Member for Families, Health & Social Care in consultation with the Cabinet Member for Resources and Financial Governance related to the Adult and Young People Social Care Dynamic Purchasing Systems (DPS);
[As at the date of this report there are none]
- Partnership arrangements to be agreed by the Cabinet at this meeting which are the subject of a separate agenda item.
[As at the date of this report there are none]

3 DETAIL

- 3.1 Section 5.1.1 of this report lists those contract and procurement strategies that are anticipated to be awarded or approved by the Cabinet.
- 3.2 Section 5.2.1 of this report lists those contracts that are anticipated to be awarded by the nominated Cabinet Member.
- 3.3 Section 5.2.2 of this report lists the delegated award decisions made by the Director of Commissioning and Procurement, between 07/04/2021 – 17/05/2021.
- 3.4 The Council's Procurement Strategy and Tender & Contracts Regulations are accessible under the Freedom of Information Act 2000 as part of the Council's Publication Scheme. Information requested under that Act about a specific procurement exercise or contract held internally or supplied by external organisations, will be accessible subject to legal advice as to its commercial confidentiality, or other applicable exemption, and whether or not it is in the public interest to do so.

4 PRE-DECISION SCRUTINY

- 4.1 This report was not presented to the Council's Scrutiny and Overview Committee prior to being brought to Cabinet but is subject to referral by the requisite number of Councillors.

5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

5.1 Proposed Strategy and Award approvals

- 5.1.1 Procurement strategies and awards for the purchase of goods, services and works with a possible contract value over £5 million decisions to be taken by Cabinet which are agenda item 11a.

Strategy	Contract Revenue Budget	Contract Capital Budget	Dept/Cabinet Member
Best Start Contract Extensions: 1) Childrens Centres for Child Development & School Readiness (x8 schools) 2) Community, Parenting Aspirations and	£589,000 (Contract extension length 4 months) £15,738,000 (Overall Contract Length 5 years & 9 months)		Children, Young People and Learning / Cllr Flemming

Strategy	Contract Revenue Budget	Contract Capital Budget	Dept/Cabinet Member
Parenting Skills (x 5 contracts) 3) Parent Infant Partnership			

5.2 Contract Awards

5.2.1 Revenue and Capital consequences of contract award decisions to be made between £500,000 and £5,000,000 by the nominated Cabinet Member in consultation with the Cabinet Member for Resources & Financial Governance or, where the nominated Cabinet Member is the Cabinet Member for Resources & Financial Governance, in consultation with the Leader.

Contract Title	Contract Revenue Budget	Contract Capital Budget	Dept/Cabinet Member
Fleet and Body Repairs Award	£750,000 (Contract length 5 years)		Sustainable Croydon / Cllr Ali
Training - Managed Service Contract Extensions	£200,000 (Contract extension length 12 months) £700,000 (Overall Contract length 6 years)		Resources & Financial Governance / Cllr Young
Employment and Welfare services Award	£1,044,814 (Contract length 2 years)		Families, Health & Social Care / Cllr Campbell
Young Person's Care Leavers Service Contract Extension	£136,250 (Contract extension length 15 months) £4,819,463 (overall contract length 8 years)		Homes / Cllr Young*

5.2.2 Revenue and Capital consequences of delegated decisions made by the Director of Commissioning and Procurement for contract awards (Regs. 19, 28.4 a & b) between £100,000 and £500,000 and contract

extension(s) previously approved as part of the original contract award recommendation (Reg. 28.4 d) and contract variations (Reg.30).

Contract Title	Contract Revenue Budget	Contract Capital Budget	Dept
Pre-paid Cards Award	£194,400 (Contract length 4 years) (Decision taken on 7 th April 2021)		Resources

CONTRACT VARIATIONS & EXTENSIONS					
Contract Title	Value of Contract to Date	Value of Extension Term	Total Revenue value including extension term	Contract Capital Budget	Dept.
GP & Pharmacy Healthcheck	apply allowed for contract extension to 02/07/22	£825,690	£130,000	£955,690	Health, Wellbeing & Adults (Public Health)
Long Acting Reproductive Contraception	apply allowed for contract extension to 31/03/22	£886,000	£256,000	£1,142,000	Health, Wellbeing & Adults (Public Health)
Enhanced Sexual Health	apply allowed for contract extension to 31/03/22	£836,000	£209,000	£1,045,00	Health, Wellbeing & Adults (Public Health)
Chlamydia Screening	apply allowed for contract extension to 31/03/22	£432,000	£108,000	£540,000	Health, Wellbeing & Adults (Public Health)
Supervised Consumption	apply allowed for contract extension to 01/10/21	£260,000	£32,500	£292,500	Health, Wellbeing & Adults (Public Health)

CONTRACT VARIATIONS & EXTENSIONS					
Contract Title	Value of Contract to Date	Value of Extension Term	Total Revenue value including extension term	Contract Capital Budget	Dept.
Advocacy	apply allowed for contract extension to 31/03/22	£1,044,750	£348,250	£1,393,000	Health, Wellbeing & Adults
Home from Hospital	variation to extend joint funding agreement to 31/03/22	£92,676	£20,000	£112,676	Health, Wellbeing & Adults
Parking Management Information System	variation to extend contract to 31/03/22 during implementation of new system	£374,861	£74,972	£449,833	Place
Capita ONE Support Renewal	variation to extend contract to 31/03/22 to allow for review of new system implementation	£146,388	£48,796	£195,184	Childrens, Families and Education
Internet Bandwidth Annual Fee for BWH LGFL	variation to extend contract to 31/03/22 to assess compliant use of LGFL	£345,000	£69,725	£414,725	Resources
Cloud based property management software services (TF Cloud)	variation to extend contract to 30/06/22 pending reprocurement	£98,392	£47,283	£145,675	Resources

CONTRACT VARIATIONS & EXTENSIONS					
Contract Title	Value of Contract to Date	Value of Extension Term	Total Revenue value including extension term	Contract Capital Budget	Dept.
GIS iSmart system	variation to extend contract to 14/05/22 pending review of requirements	£70,000	£30,000	£100,000	Resources

Approved by: Matthew Davis, Head of Finance – MTFs, on behalf of Chris Buss, Interim Director of Finance, Investment and Risk and Section 151 Officer

6 LEGAL CONSIDERATIONS

- 6.1 The information contained within this report is required to be reported to Members in accordance with Appendix B of the Council's Tenders Contracts Regulations and, in relation to the acquisition or disposal of assets, Regulation 9.3 of the Council's Financial Regulations which states 'Recommendations on acquisitions or disposals valued between £500k and up to £5m must also be approved by the Cabinet Member for Resources and Financial Governance in consultation with the Leader of the Council, subject to the intention to do so having been reported to a previous meeting of Cabinet and in accordance with the Leader's Scheme of Delegation. Recommendations on acquisitions or disposals valued over £5m will be reported for approval to Cabinet.'

Approved by: Doutimi Aseh, Interim Director of Law and Governance

7 HUMAN RESOURCES IMPACT

- 7.1 There are no immediate HR issues that arise from the strategic recommendations in this report for LBC staff. Any specific contracts that arise as a result of this report should have their HR implications independently assessed by a senior HR professional.

Approved by: Sue Moorman, Director of Human Resources

8 EQUALITY IMPACT

- 8.1 An Equality Analysis process has been used to assess the actual or likely impact of the decisions related to contracts mentioned in this report and mitigating actions have been defined where appropriate.
- 8.2 The equality analysis for the contracts mentioned in this report will enable the Council to ensure that it meets the statutory obligation in the exercise of its functions to address the Public Sector Equality Duty (PSED). This requires public bodies to ensure due regard to the need to advance equality of opportunity; foster good relations between people who share a “protected characteristic” and those who do not and take action to eliminate the potential of discrimination in the provision of services.
- 8.3 Any issues identified through the equality analysis will be given full consideration and agreed mitigating actions will be delivered through the standard contract delivery and reporting mechanisms.

Approved by: Yvonne Okiyo, Equalities Manager

9 ENVIRONMENTAL IMPACT

- 9.1 Any issues emerging in reports to the relevant Cabinet Member will require these considerations to be included as part of the standard reporting requirements, and will not proceed without full consideration of any issues identified.

10 CRIME AND DISORDER REDUCTION IMPACT

- 10.1 Any issues emerging in reports to the relevant Cabinet Member will require these considerations to be included as part of the standard reporting requirements, and will not proceed without full consideration of any issues identified.

11 DATA PROTECTION IMPLICATIONS

- 11.1 Will the subject of the report involve the processing of ‘personal data’?

NO

- 11.2 Has a Data Protection Impact Assessment (DPIA) been completed?

NO

Data Protection Impact Assessments have been used to assess the actual or likely impact of the decisions related to contracts mentioned in this report and mitigating actions have been defined where appropriate.

Approved by: Rachel Soni, Interim Director of Commissioning & Procurement

CONTACT OFFICER:

Name:	Bianca Byrne
Post title:	Head of Commissioning and Procurement (Corporate)
Telephone no:	63138

BACKGROUND DOCUMENTS:

The following public background reports are not printed with this agenda, but are available as background documents on the Croydon Council website agenda which can be found via this link [Cabinet agendas](#)

- *Fleet and Body Repairs Award.*
- *Training - Managed Service Contract Extensions*
- *Employment and Welfare Support Services*
- *Young Person's Care Leavers Service Contract Extension*

This page is intentionally left blank

REPORT TO:	CABINET 7 June 2021
SUBJECT:	<p>Variation to extend the following Best Start contracts:</p> <ol style="list-style-type: none"> 1. Child Development and School Readiness Services (8 contracts) 2. Parenting Support and Parenting Aspirations (5 contracts) 3. Parent Infant Partnership (1 contract)
LEAD OFFICER:	<p>Debbie Jones, Executive Director Children, Families and Education</p> <p>Shelley Davies, Director of Education</p> <p>Pasquale Brammer, Head of Service Commissioning & Procurement (CFE)</p>
CABINET MEMBER:	<p>Councillor Alisa Flemming</p> <p>Children, Young People & Learning</p>
WARDS:	All
<p>COUNCIL PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON</p> <p><u>Council's priorities</u></p> <p>The proposals in this report support the priorities in the Council's Corporate Plan (2018 - 2022):</p> <p>People live long, healthy, happy and independent lives</p> <ul style="list-style-type: none"> • To promote early help • Support families by giving their children a better start in life, improve health outcomes and increase healthy life expectancy • To help people from all communities to be healthy and resilient and able to maximise their life chances and independence <p>Our children and young people thrive and reach their full potential</p> <ul style="list-style-type: none"> • Children in Croydon are safe, healthy and happy, and aspire to be the best they can be. • Every child and young person can access high quality education and youth facilities. <p><u>Croydon Renewal Plan</u></p> <p>These services are aligned to the council's new priorities and ways of working in which we will:</p> <ul style="list-style-type: none"> • Live within our means, balance the books and provide value for money for our residents • Focus on tackling ingrained inequality and poverty in the borough • Follow the evidence to tackle the underlying causes of inequality and hardship, like structural racism, environmental injustice and economic justice 	

- Focus on providing the best quality core service we can afford.

The proposals in this paper meets the criteria for essential expenditure in accordance with the financial guidance.

Policy Context

The Best Start for Life, Early Years Review Report (March 2021) sets out a new requirement for local authorities to demonstrate how they will improve support for children and their parents during the first 1001 critical days and how they intend to achieve new national goals.

Legislation

Under the provision of the Childcare Act 2006 and Apprenticeship, Skills, Children and Learning Act 2009, the Council has a statutory duty for the provision of early childhood services. The Act requires the Council to:

- Make arrangements to secure that early childhood services are provided in an integrated manner, to facilitate access to those services and maximise the benefit of those services to parents, prospective parents and young children,
- Ensure that such consultation is carried out before making significant changes.
- Ensure sufficiency of children's centre provision to meet local need

Croydon Best Start is a partnership approach in delivering services to support families from pregnancy until their child starts school. Across the partnership, midwives, health visitors, children's centres, early years and the voluntary sector work together to deliver prevention and early intervention to improve children's outcomes, particularly for those most in need.

FINANCIAL IMPACT

The financial value of extending all 13 Agreements and Contracts for the period 1st September to 31st December 2021, if agreed, will cost the Council £589,000.

If these recommendations are agreed the Council will be committing to an aggregate spend of £15.738m. The value of each contract type is outlined in the table below:

Best Start contracts	£'000 Per annum (2021/22)	£'000 Aggregate 5yrs + 5mths (2016-2021)	£'000 4mths extension (1/9/21 – 31/12/21)	£'000 Aggregate 5yrs + 9mths (2016-2021)
8 Children's Centres	1,163	11,120 ¹	445 ²	11,565
5 Parenting Skills and Parenting Aspirations (6 Lots)	302	1,886	123	2,009
Early Learning Collaboration	0	1,799	0	1,799
Parent Infant Partnership	64	344	21	365
Total	1,529	15,149	589	15,738

¹Aggregate value for 8 children's centres includes funding allocation for Shirley Children's Centre bought in-house 1st April 2020.

²One children's centre has indicated that they do not wish to continue running children's centre services beyond 31st

August 2021.

- The budget for FY 2021/22 has been agreed although has significantly reduced in line with MTFs savings project (CFE SAV09).
- Subject to agreement, information presented, represents the maximum financial impact for the proposed full extension period of 4 months at a cost to the Council of £589,000. However there is all likelihood that less time is required, within 3 months which would reduce the costs to £442,000 (subject to the outcome of the statutory consultation, preserving the remaining budget for re-procurement).
- Current contracts are due to end 31st August 2021. These proposals seek to extend on the existing budget reducing, pursuing in-year efficiencies (FY 2021/22) wherever possible.
- Whilst sufficient 2021/22 budget exists to support the extension of the current contractual commitments, the extension of the current contracts create a risk to the deliverability of the agreed MTFs savings programme in 2021/22 by reducing the budget remaining to fund the revised delivery model. The service is aware of the need to find substitute savings to mitigate the financial risk in full and is currently working on the identification of one-off alternative savings or this financial year.
- By seeking a variation to extend, the Council will enable a smooth transfer of service provision and mobilisation with the new contractor, once the statutory consultation and procurement activity has been concluded.

FORWARD PLAN KEY DECISION REFERENCE NO.: 2321CAB

This is a Key Decision as defined in the Council's Constitution. The decision may be implemented from 1300 hours on the expiry of 5 working days after it is made, unless the decision is referred to the Scrutiny & Overview Committee by the requisite number of Councillors.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

1.1 The Cabinet is recommended by the Contracts and Commissioning Board to approve the variation of the Best Start contracts by up to a further 4 months (1st September to 31st December 2021) in accordance with Regulation 30 of the Council's Contracts and Tenders Regulations for an overall maximum contracts value of £589,000, made up of:

- Eight, Best Start Children's Centres with contracts/SLAs to four academies and five maintained schools. Four month extension value £445,000
- Five, Community, Parenting Aspirations and Parenting Skills contracts (covering 6 Lots). Four month extension value £123,000
- One, Parent Infant Partnership contract. Four month extension value £21,000

2. EXECUTIVE SUMMARY

- 2.1 The purpose of this report is seeking a variation to extend the Best Start contracts and agreements for up to a further 4 months from 1st September to 31st December 2021.
- 2.2 Plans for re-procurement have been delayed due to the consultation on the Croydon Renewal Plan and approval of Council budgets. In addition there is a duty to consult prior to re-procurement for new contracts for services, and inform final recommendations to be approved by Cabinet.
- 2.3 Statutory consultation will commence following the Mayoral and local elections in May 2021.
- 2.4 The new timeline for governance and procurement forecast a gap in service provision, exposing the council to the significant risk of litigation due to staff eligible for TUPE, political fallout and service user complaints.
- 2.5 There is a legal requirement on the local authority to secure arrangements for early childhood services for very young children and their families; improve their wellbeing and reduce inequalities. A gap in service would have a significant impact on children's emotional and physical wellbeing outcomes and disrupt support for families, particularly during the first 1000 critical days.
- 2.6 To mitigate this risk and safeguard access to services, in particular for vulnerable families and parents with very young babies, it is proposed to request a short extension to current contracts for up to four months to enable a smooth transfer of service over to the new contractor.
- 2.7 It is not envisaged that the full term of the proposed extension will be needed, however as a safeguard should there be any further delay, the full financial impact is considered. If the recommendations are agreed the Council will be committing to spend an aggregate value £15,738m.
- 2.8 However should the outcomes of the statutory consultation for new services be approved by Cabinet in July 2021, and new contracts can be awarded by 1st December 2021, then the aggregate contract value for current contracts would reduce to £15,590m.
- 2.9 The content of this report has been endorsed by the Contracts and Commissioning Board.

CCB ref. number	CCB Approval Date
CCB1685/21-22	25/05/2021

3. DETAIL

Context

- 3.1 The *Best Start for Life, Early Years Healthy Development Review report (2021)*, corroborates previously documented evidence that the first 1000 days, are the most significant in a child's life. Starting from conception, this is the period where the most development takes place and the importance of secure attachment and bonding in providing the baby with love and security; building blocks for healthy brain development. This policy sets out the responsibilities for local authorities.
- 3.2 Every child deserves the best start in life. Good parenting and help when needed, supports and creates a nurturing environment for children to grow and be confident in exploring their environment and develop their curiosity about the world. High quality early learning experiences, both at home and in the community, are crucial as a child grows and develops, and provides the foundation for lifelong emotional and physical wellbeing, school readiness and good school attainment.
- 3.3 Croydon Best Start was launched in April 2016 to transform how early years services work together across the partnership; to be more joined up and give families a seamless experience when accessing universal services and support. Best Start was co-designed with families, with their views at its heart.
- 3.4 Midwives, Health Visitors, children's centres, early years providers, council teams, community and voluntary sector, work together to provide an holistic offer of support to families when needed.
- 3.5 An integrated outcomes framework delivers outcomes against the Healthy Child Programme, Sure Start Children's Centre Core Purpose and Early Years Foundation Stage. Working strategically across the partnership, Best Start contributes to improving the following outcomes for children and families:
- Parental Mental Health
 - Healthy Start
 - Healthy Child Weight Management
 - SEN Early Years Inclusion
 - CCG CAMHS, Acute services and Speech and Language
 - Early Help Localities and Children's Social Care
- 3.6 Best Start fulfils the duty on local authorities in the Childcare Act 2006, to improve the wellbeing of young children and reduce inequalities between young people. Further, there is a requirement to "*secure that early childhood services in its area are provided in an integrated manner to facilitate access to those services and maximise the benefit of those services to parents, prospective parents and young children*".

- 3.7 The *Best Start for Life* policy paper will fulfil the Government's vision for every local authority working with local partners, to publish a Start for Life offer across health and care, for universal services and a universal+ offer to meet the needs of specific community groups. Early discussions are taking place to scope and implement the new policy in Croydon.

Current contractual position

- 3.8 Best Start services are delivered by several providers working together in a partnership approach. Over time the various organisational and governance structures that were in place at the start of the programme have changed, including contracts commissioned as part of the wider programme. The remaining providers within the scope of this report and proposals are:
- Eight, Best Start Children's Centres delivering Child Development and School Readiness services (5 contracts with academies and 3 SLAs with maintained schools). Annual value, £1,163,000
 - Community, Parenting Aspirations and Parent Support services (5 contracts, six lots). Annual value, £302,000
 - Parent Infant Partnership Services (1 contract). Annual value, £64,000
- 3.9 Following Cabinet approval (reference: Croydon Best Start Child Development & School Readiness Services Designated Children's Centres 2016-2018, agenda item 10.2., minute March 2016 A23/16) Contracts and Service Level Agreements (SLAs) were awarded in 2016 to providers of 9 Designated Children's Centres in the London Borough of Croydon. The award was for contracts with an initial term of two years, with an option to extend for a further period of up to 12 months. Contracts and Agreements were let in 2016 for 2 years (April 2016 to March 2018) and extended in 2018 following CCB recommendation for approval (CCB ref 1319/17-18, 01/02/2018) for 1 year (April 2018 to March 2019).
- 3.10 In August 2018 following CCB recommendation for approval (CCB ref 1390/18-19, 31/08/18) contracts were extended for a further period of 1 year (April 2019 to March 2020). In January 2020, following CCB recommendation for approval (CCB ref 1549/19-20, 28/1/20) contracts were further extended for a period of 5 months (April 2020 to August 2020). The five month extension allowed for contracts to be aligned to the school budget year September to August.
- 3.11 Recommissioning activity planned to take place in 2020 had to be delayed due to the coronavirus pandemic to enable the Council to manage staffing and redeploy resources to critical services for its residents. Pursuant to Part 5 A Article 1.7 (Urgency Decisions) of the Council's Constitution the Cabinet Member for Children, Young People and Learning in consultation with the Cabinet Member for Finance and Treasury was recommended as the relevant body to approve the extension by way of variation of Best Start suite of contracts listed in this report by a further 12 months (1st September 2020 to 31st August 2021) for an aggregate value of £2,810,000 to give a maximum aggregate contracts value of £15,656,000 (CCB ref no 1573/20-21).

- 3.12 As a consequence of the Council's financial challenges, and in-year savings proposals, the budget for children's centres had to be significantly reduced, and efficiencies found from other contracts. This added significant further delays to achieve agreement and decision on the proposed new model and contract. Annual contract values were reduced and the contract for Early Learning Collaboration services terminated early to be delivered in-house. The new aggregate value for the Best Start contracts up to 31st August 2021 reduced to £15,152,000.
- 3.13 Contracts and Agreements remain with the following providers:
- 8 x Best Start Child Development and School Readiness contracts/SLAs to three academies and five maintained schools. Annual value £1,163,000. The agreements are with the following schools/academies:
 - Aerodrome Academy: Aerodrome Children's Centre
 - Oasis Academy Bryon (Oasis Trust): Byron Children's Centre
 - Fairchildes Academy: Fairchildes Children's Centre
 - Federation of Crosfield and Selhurst Nursery Schools and Children's Centres: Crosfield Children's Centre
 - Purley Oaks Primary School: Purley Oaks Children's Centre
 - Gilbert Scott Primary School: Woodlands Children's Centre
 - Kensington Avenue Primary School: Kensington Avenue Children's Centre
 - 5 x Community, Parenting Aspirations and Parenting Skills contracts covering 6 lots). Annual value £302,000 (original award CCB ref 1162/16-17, 23/08/16):
 - Lot 1, Croydon Voluntary Action – Asset Based Community Development
 - Lot 2.1, Home-Start - Home Visiting
 - Lot 2.2, South London and Maudsley – Being a Parent programme
 - Lot 2.3, Home-Start – Parent Champion programme
 - Lot 2.4, NAS (PRISM Consortium) – Group programme for families with children under five whose needs in relation to speech and communication delay have already been identified
 - Lot 3, Phase 1 – Employability support programme
 - 1 x Parent Infant Partnership (providing parental mental health services). Annual value £64,000.
- 3.14 Contracts are due to terminate on 31st August 2021. Due to the consultation on the Croydon Renewal Plan, approval of Council budgets, the timeline for procurement was delayed and further impacted by pre-election restrictions 'Purdah' relating to the Mayoral and local elections.

- 3.15 There is a statutory duty to consult on commissioning intentions for early childhood services and consequently, the public consultation to inform Cabinet decisions cannot take place until after the elections. Procurement timelines now indicate there will be a gap in provision as new contracts for services will not be in place by 1st September 2021.
- 3.16 A gap in service provision would leave the Council open to significant challenge in relation to employment rights, absence of essential support for families (particularly for the most vulnerable who would be the most impacted by the impact of Lockdown due to the coronavirus pandemic) and complaints.
- 3.17 To safeguard service provision, staff and the Council, it is proposed to vary the current term by up to four months from 1st September to 31st December 2021.

Service update

- 3.18 The Children's Commissioner, in her *Lockdown babies: Children born during the coronavirus crisis* report (May 2020), highlighted concerns about the impact of the pandemic, limiting the support that was once readily available, but restricted under Lockdown; particularly for those with newborns. Her report highlights not only the known risks though the increase in reports of domestic abuse for example, but also the potential unknown risks to emerge as and when restrictions ease and children become visible to services and community partners. The conclusion is that services will need to plan for a range of support once needs become known, but which may not be exclusive to poorer mental and physical health, impact of food poverty and poor housing conditions, and emotional security and separation issues as a pre-requisite for early learning.
- 3.19 Following the first Lockdown in March 2020, Best Start services swiftly mobilised to virtual delivery, working with the community to offer services to families, supporting the most vulnerable and those in need. By summer 2020 all providers had a blended delivery in place that could flex and contract in line with government guidance, giving confidence to families accessing face to face services in a Covid-19 secure way.
- 3.20 As services restore and mobilise further, delivery will include prioritising access to provision for very young babies and those with emerging additional needs, along with targeted outreach to vulnerable families who may feel less confident accessing services.
- 3.21 In line with a reduced budget, a review of options were considered to inform future commissioning. As host of many Best Start services, children's centres are critical to these plans. New proposals aim to ensure families across the borough can access support provided locally and directly by children's centres and the wider Best Start partnership, whilst at the same time, streamlining the children's centre model to ensure we are able to live within our means.

3.22 Work in development around a new Early Years Health and Care Strategy and Early Years Education Review will inform strategic partnership working and incorporate the six Action Areas in the *Best Start for Life* policy paper, for local authorities to:

- Ensure families have access to the services they need
 - Seamless support for families
 - A welcoming hub for families
 - The information families need when they need it

- Ensure the Start for Life system is working together to give families the support they need
 - An empowered Start for Life workforce
 - Continually improving the Start for Life offer
 - Leadership for change

3.23 An Equalities analysis has been undertaken for consultation on the Croydon Renewal Plan, for the statutory consultation on the proposed redesign of children's centres and will be updated along with the final strategy proposals.

4. CONSULTATION

4.1 The Director of Education and Head of Commissioning & Procurement, Children, Families and Education (CFE) have written to the incumbent providers explaining the rationale for seeking permission to vary current contracts and extend for a further four months to 31st December 2021. Individual meetings are taking place during April and May (upon request), and most are in agreement, subject to understanding the proposals outlined in the consultation paper and budget for the proposed extension period.

4.2 One children's centre has indicated they do not wish to extend the contract for children's centre services beyond the current term. This contract will therefore cease on 31st August. There are also two other contractors who are still to confirm agreement to extend beyond the 31st August. With this uncertainty, the local authority will work with the incumbent(s) to ensure a smooth exit management strategy, plan and transfer of service in the interim, pending re-procurement.

4.3 In order to achieve CCB and Council governance timelines, these proposals are based on the current information and intentions of the incumbent providers who have agreed in principle to the proposed variation to extend, with final agreements confirmed once the statutory consultation goes public in May 2021.

4.4 The statutory consultation will be launched on 7th May 2021, subject to the conclusion of the Mayoral and local elections, and its findings will determine the final proposal to be submitted for Cabinet approval in July 2021.

4.5 Timescales for next steps:

7 th May 2021	CCB approval of recommendation to Cabinet for a variation to extend contracts for up to four months, 1 st September to 31 st December 2020 to mitigate gap in service
10 th May to 8 th June 2021	Launch public consultation on proposed children's centre model with a series of both virtual and face to face engagement sessions. Consultation with staff will also be undertaken
24 th May 2021 to 7 th June 2021	Formal discussions with incumbent providers who intend to terminate Agreements and Contracts on 31 st August 31, commencing Exit Management strategy and plans during the 3 months' notice period (from 1 st June 2021).
7 th June 2021	Cabinet decision regarding CCB recommendations to agree a variation to extend existing contracts to 31 st December 2021
18 th June 2021	Report on consultation and recommendations for recommissioning
12 th July 2021	Best Start Strategy report with consultation findings presented for Cabinet approval
14 th July 2021	Launch open tender for new contracts for Best Start services
17 th August to 16 th September 2021	Tender evaluation and moderation
September 2021	Best Start Award report with recommendations for new contracts presented for Cabinet approval
October 2021	Award new contracts and commence mobilisation to enable a smooth transfer of service to the new providers
November 2021	Mobilisation and TUPE transfer to new contractor
1 st December 2021	New service commences

5 PRE-DECISION SCRUTINY

- 5.1 The process for awarding these contracts has followed set procurement rules and as such has not been considered by Scrutiny.

6 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1 Best Start services fulfil the statutory duty on local authorities to provide early childhood service, and thus, comply with the Council's essential spending criteria.
- 6.2 Best Start services are funded from the General Fund. The proposed extensions for up to four months, are expected to cost the Council £589,000.

The budget for Best Start services has been reduced as part of the Croydon Renewal Plan and Medium Term Financial Strategy (MTFS) savings programme (CFESAV09). The total net budget for 2021/22 of £1,529,000 has been approved by Council.

The following table presents the revenue consequences on the available budget to fund these proposals. There is no Capital spend associated with this paper.

6.3 Revenue consequences of report recommendations

	Current year		Medium Term Financial Strategy (MTFS) - 3 year forecast	
	2021/22 (A)	2021/22 (B)	2022/23	2023/24
	£'000	£'000	£'000	£'000
Revenue Budget available	1,529	1,529		
Expenditure	805	805		
Income				
Effect of decision from report				
Expenditure	589	442		
Income	0	0		
Remaining budget	<u>135</u>	<u>282</u>		

6.4 The effect of the decision

The above table presents two scenarios and financial implications to be considered in line with these proposals. Scenario A, represents the total budget required to extend contracts up to 31st December 2021. However, subject to the conclusion of the Mayoral and local elections, we fully anticipate new contracts to start earlier, on 1st December 2021. Scenario B, represents the total budget which would be utilised to extend contracts for three months (1st September to 30th November), preserving more of the remaining budget to procure new contracts for the financial period ending March 2022.

Whilst there is sufficient budget in 2021/22 to support the extension of the current contractual commitments under either scenario, both scenarios create a risk to the deliverability of the agreed MTFS savings programme by reducing the 2021/22 budget available to fund a revised delivery model from either December 2021 or January 2022.

This risk only materialises in the 2021/22 financial year due to delayed implementation of the new model and the full year effect of the proposed savings (£660k) will be realised from 2022/23 as that model will be operational prior to the commencement of the next financial year. The quantified risk to the delivery of the current savings is approx. £220k for Scenario A and £76k for B based on the estimated monthly operational cost of the proposed delivery model. The service is aware of the need to find

substitute savings to mitigate the financial risk in full and is currently working on the identification of one-off alternative savings or this financial year. By presenting both the maximum and anticipated budget required to fund these proposals, we seek to reassure Cabinet that full regard has been given to the consequences of each of the expenditure scenarios, and for this to be taken into account as part of the considerations prior to final approval. Additional budget will be made available where incumbent providers have given notice to cease delivering services on 31st August 2021.

6.5 Risks

The following risks have been identified and are being actively managed within the service:

Risk	Impact	Mitigation
Gap in service at the end of the current contract term if these proposals are not approved	Council will be exposed to significant risk of challenge due to lack of provision for families, particularly those most in need, leading to political fallout and complaints. In addition, staff eligible to TUPE rights following procurement for new services.	Cabinet approval of these proposals to vary the current contract term would mitigate these risks and allow for a smooth transfer of service over to the new contractors.
Risk that some providers may be unwilling to agree to an extension beyond the current contract term (ending 31 st August 2021).	Lack of provision in corresponding locality reach area, leading to disjointed delivery and inequality for families in scope to receiving help and support. Staff may need to be TUPE'd into the council to continue delivering service, and then TUPE's back out to a new provider when awarded	Early engagement with the incumbent providers and solution finding to give assurance of Council's commitment to Best Start services to improve outcomes for children and families. Financial or employment liabilities will need to be considered, agreed and mitigated if the service is to achieve its MTFS savings in FY21/22
Risk to re-procurement budget if extension up to 31 st December 2021 is fully utilised.	If full extension is needed remaining budget would be insufficient to tender for full service provision. Additionally, there is a risk to the service achieving FY21/22 savings should	Strategy report will request waiver to delegate award decision to Lead Member and concurrent call-in and standstill for award timelines to allow new contracts to be awarded with the minimal delay.

	additional budget for new services be required.	
Delayed outcome from Mayoral and local elections leading to further delays to statutory consultation and Cabinet approval for new services.	If a further extension is required beyond 31 st December 2021 then the budget for procurement will be further impacted and it would not be able to procure services until April 2022.	In the event of any further delay a full risk analysis would need to be undertaken to advise Cabinet of any potential litigation, i.e., judicial review, should a decision on new services need to be taken prior to the outcomes of the consultation and in line with the remaining budget for procurement.
Risk of judicial review should Cabinet make a decision on the new children's centre model prior to the conclusion of the statutory consultation.	Should a decision be taken by Cabinet on the future children's centre service model, prior to consultation, and found to be unlawful by the High Court, Croydon Council would be open to significant financial and political penalties.	In the event of further delays to the consultation and procurement activity, and to avoid any risk of legal challenge should Cabinet make a decision on new services prior to the consultation findings, more budget would need to be found to fund further contract extensions. However, this will be avoided at all cost.
Legal challenge from another supplier	The variation may be a risk of procurement challenge.	The risk is considered relatively low as the further extension period is short and the Council is re-procuring services, which offers the market the opportunity to bid for work.

6.5 Options

The proposals in this paper are being recommended due to contracts coming to an end on 31st August 2021. This option, if accepted will safeguard the Council from significant risks arising due to the delays in launching the

consultation in time to make recommendations to Cabinet on future commissioning.

The alternative option to let contracts come to a natural end has been rejected as this would lead to a gap in service, leaving families with young children with no provision and staff unprotected.

6.6 Future savings/efficiencies

Despite operating in a financially challenging climate, service improvement, efficiency and the delivery of good outcomes for children and their families remain at the heart of the Best Start contracts for services. Robust contract monitoring will continue, identifying further efficiencies where possible.

If additional savings are required from this budget, this would have such an impact on contract spend and allocation to providers, that this would likely render this procurement unviable. If that was to happen, we would need to develop an alternative model of delivery.

Approved by: Kate Bingham, (Interim) Head of Finance, Children, Families and Education on behalf of Chris Buss, Section 151 Officer.

7. LEGAL CONSIDERATIONS

- 7.1 The Interim Director of Law and Governance comments that the Cabinet has the authority to approve the recommendations pursuant to Regulation 30 of the Tenders and Contracts Regulations. Legal considerations in respect of the proposed variation have been reflected in the report.

Approved by Sandra Herbert, Head of Litigation and Corporate Law
On behalf of Doutimi Aseh, Director of Law and Governance & Deputy Monitoring Officer.

8. HUMAN RESOURCES IMPACT

- 8.1 This report recommends an extension to a number of existing contracts. Therefore, the service provisions would remain as they are, and there are no human resources or TUPE implications arising from this report.

However, the re-procurement exercise is likely to involve service provision changes which may invoke the effects of the Transfer of Undertakings (Protection of Employment) 2006 Legislation (amended 2014). The service will be working with the current contractors and their HR providers to ensure the appropriate policies and procedures are followed.

Approved by: Deborah Calliste, Head of HR for Children, Families and Education on behalf of the Director of Human Resources

9. EQUALITIES IMPACT

- 9.1 A full Equality Analysis was completed in January 2021 as part of the Croydon Renewal Plan proposals and updated in April 2021 to reflect the consultation on the redesign of children's centres. A new Equality Analysis will be undertaken in June 2021 as part of the procurement strategy proposals to ascertain the potential impact on groups that share protected characteristics.
- 9.2 These proposals will meet the Council's obligations in ensuring equity of access to provision, particularly for those with protected characteristics. By approving the proposals to extend contracts for up to four months the Council will ensure families with children under five can access the services and support they need, reduce inequalities and improve their life chances.
- 9.3 Equalities is a standing item and part of the contract management process. Regular monitoring allows for the early identification of any potential adverse impact of groups that share protected characteristics, enabling opportunities to intervene and avoid any unlawful action and improve the outcome.

Approved by: Yvonne Okie, Equalities Manager

10. ENVIRONMENTAL IMPACT

- 10.1 It is considered that there are no increased or decreased negative environmental sustainability impacts, from the proposals contained in this report.

11. CRIME AND DISORDER REDUCTION IMPACT

- 11.1 Supporting families through these services contributes to building resilience and community connections, with the intention to avoid people becoming involved in crime and disorder. Best Start services and partners work together to support children and families exposed to sexual violence and domestic abuse.
- 11.2 It is considered that there are no increased impacts on children and families in these proposals. Extending the Best Start contracts for a further four months will ensure families are able to access the services when they need them the most.

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 12.1 To approve the request to vary the terms of the Best Start contract for services and extend up to a further four months, to 31st December 2021.

13. OPTIONS CONSIDERED AND REJECTED

a) Do nothing and let contracts come to a natural end – Rejected

This would expose the Council to significant risk by having a gap in provision leaving families with young children and the most vulnerable with no access to services or support, and staff rights unprotected.

b) Agree to a variation to extend existing contracts - Recommended

This option will ensure the continuation of service provision and reduce the significant risks both economic, political and potential employment litigation, to the Council

14. DATA PROTECTION IMPLICATIONS

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

YES

The name, age, address and other personal data is used by providers to deliver the service on a day to day basis. Personal information will be shared with partners, as appropriate, as part of a referral to safeguard a child or vulnerable adult. All other referrals for additional support will require prior consent of the parent/carer.

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

NO

A DPIA was last completed in 2020 and will be reviewed as part of the procurement strategy report to Cabinet in July 2021.

CONTACT OFFICER: Sharon Hemley, Early Help Commissioning Manager
Sharon.hemley@croydon.gov.uk

BACKGROUND PAPERS

- The Best Start for Life, The Early Years Healthy Development Review Report, 2021
- Lockdown Babies, Briefing Paper, May 2020
- Statutory framework for the early years foundation stage, March 2021