

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.

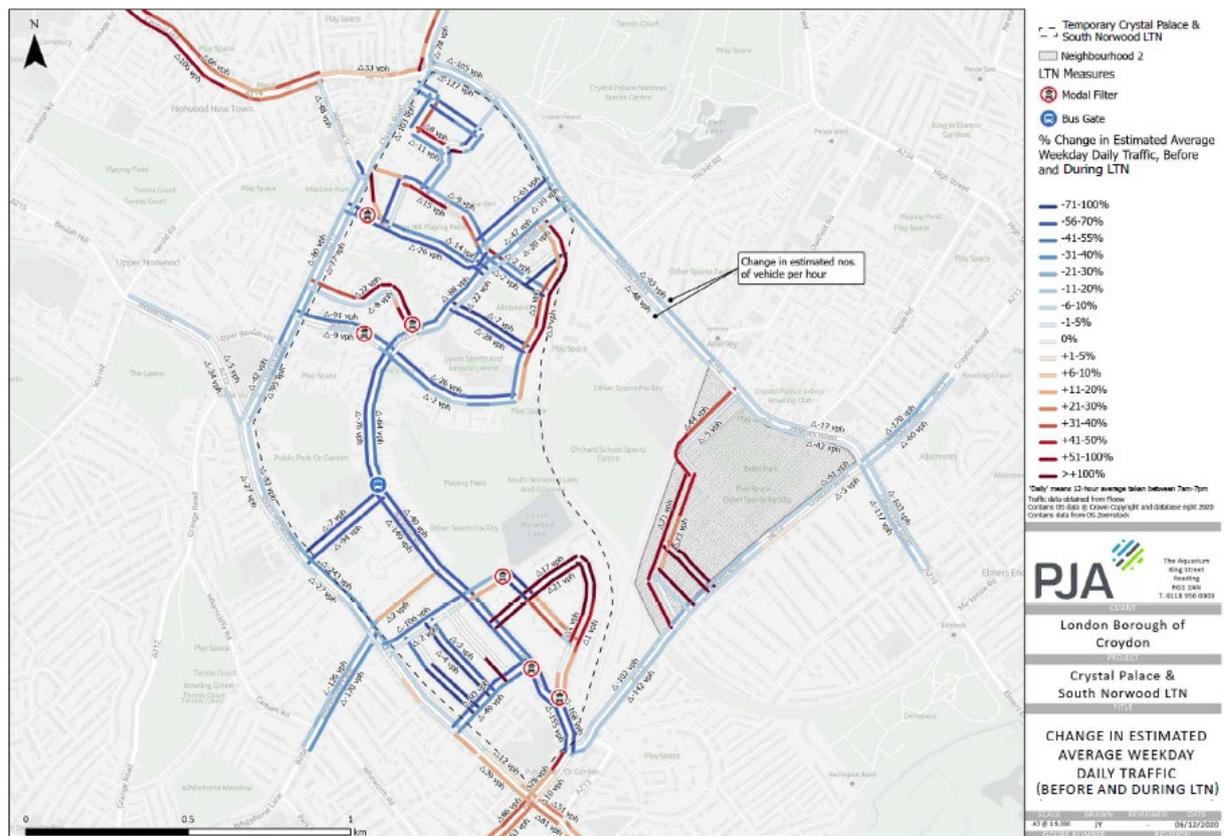
Effects of the Temporary LTN and Feedback Received

- 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)

Figure 4.1 Change in Average Daily Traffic Weekday Comparing 'During LTN with 'Before LTN'



4.21 The PJA report draws some main findings, but without discussion as to possible compounding effects of road works (other than the effects of the temporary traffic signals in Church Road). Their main findings on the change in estimated traffic flow and journey times are:

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 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

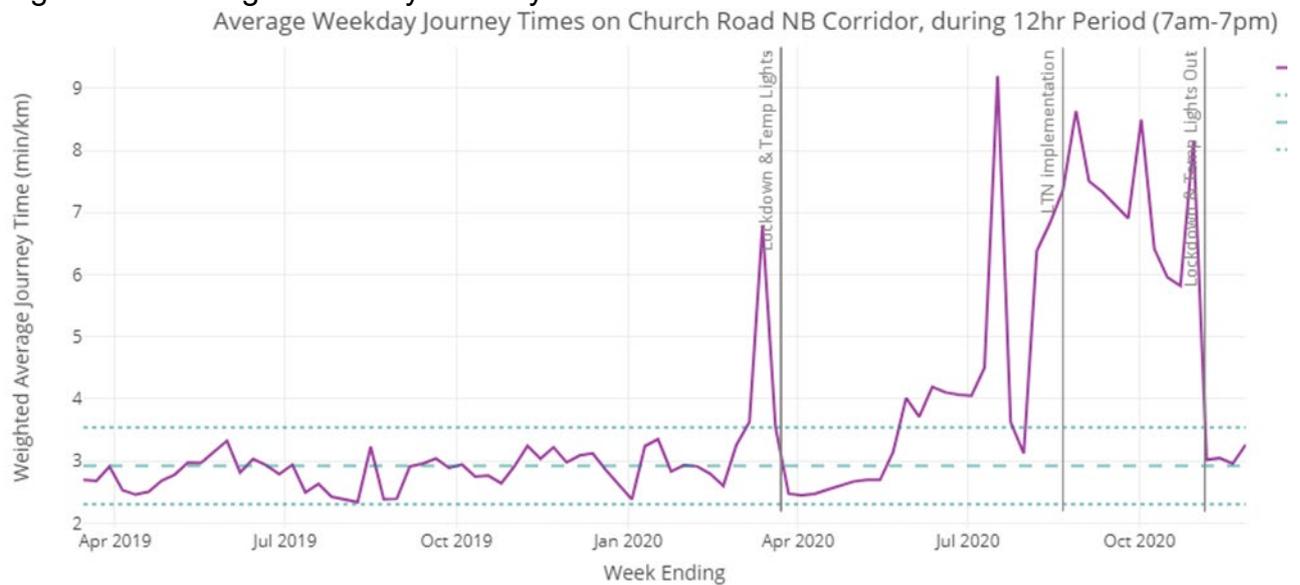
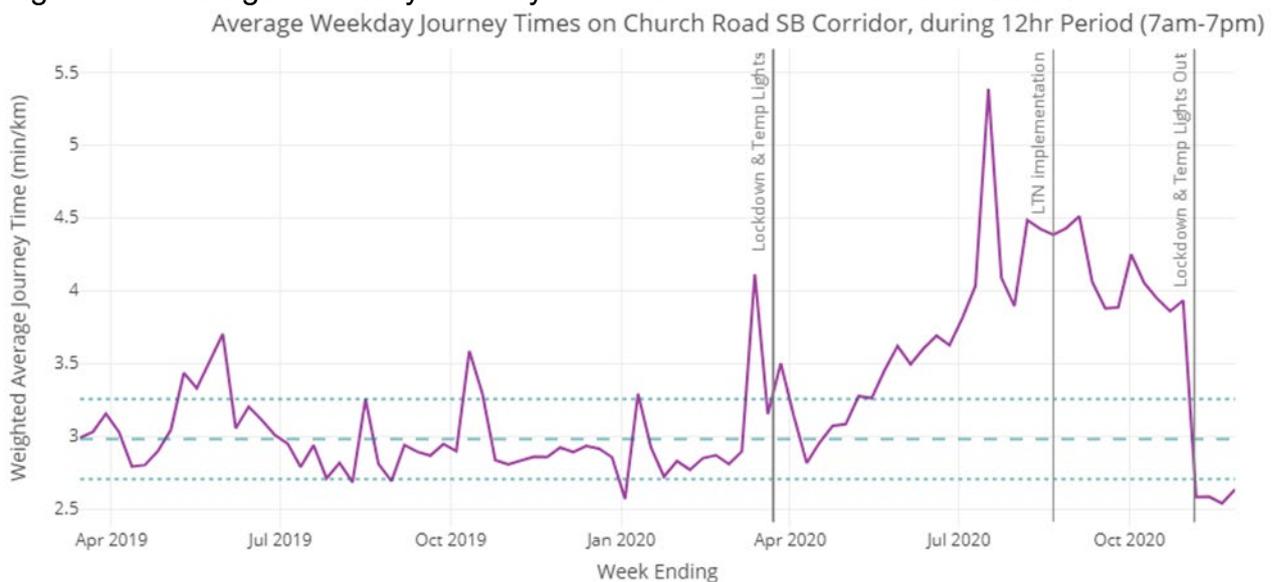


Figure 4.3 Average Weekday Journey Times on Church Road South Bound



- 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:

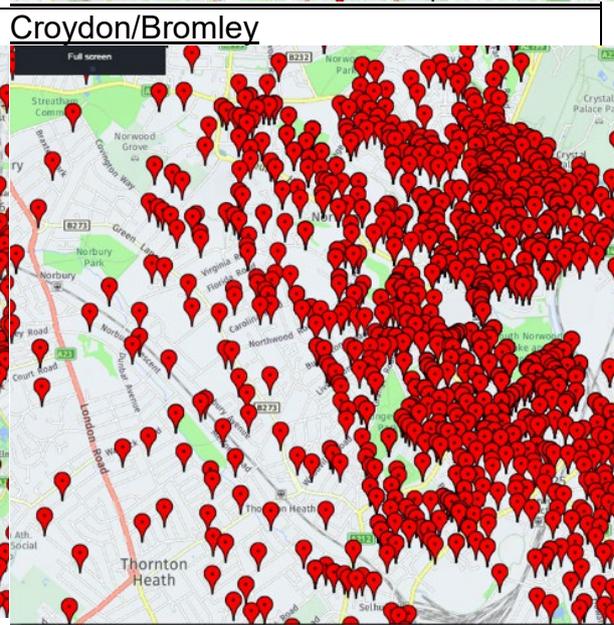
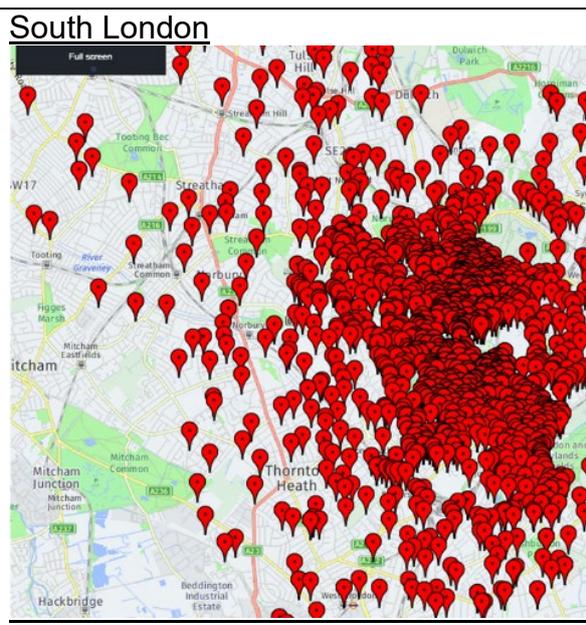
- 6,022 letters approx. with unique codes were delivered to residential properties and within the LTN area and on the A roads bounding it. The purpose of the unique code was validation, to help match responses to addresses.
- 250 street notices were put up on street furniture within the LTN area and 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	41	13	6	ANPR	41	33	8		
Keep	13	22	1	Keep	33	64	14		
Remove	6	1	47	Remove	8	14	35		
Agree to all 3				Disagree to all 3				1No 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	319	74	131	ANPR	444	386	47		
Keep	74	132	5	Keep	386	659	97		
Remove	131	5	561	Remove	47	97	229		
Agree to all 3				Disagree to all 3				1No 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 Business Survey	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

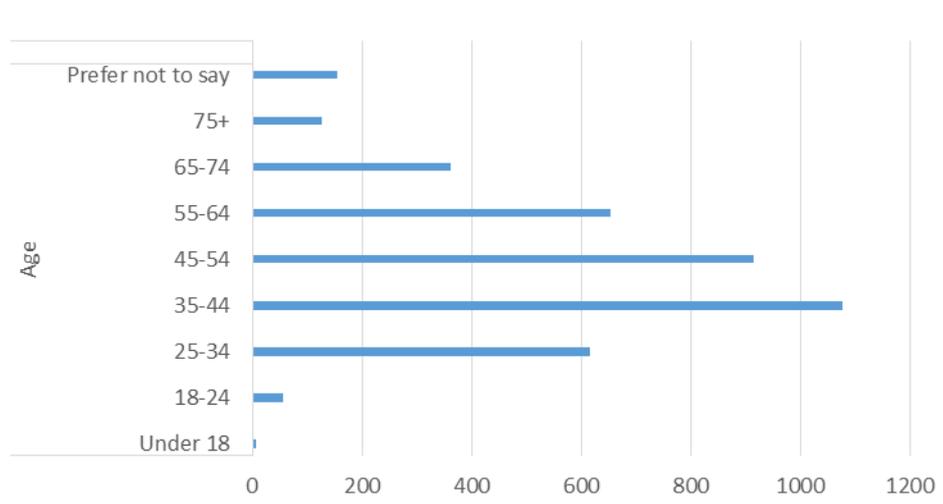
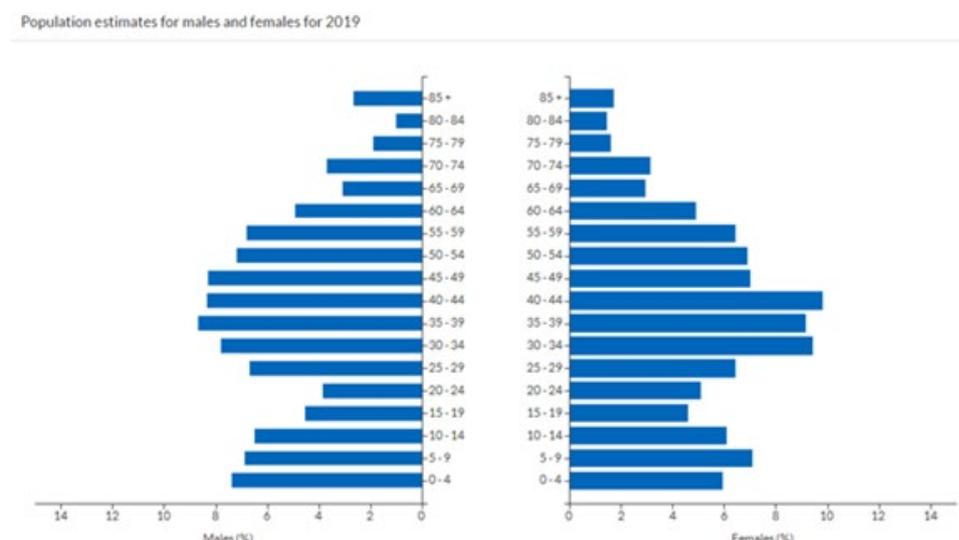


Figure 5.2 Age Profile of Population within the Temporary LTN (see Equality Analysis)



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

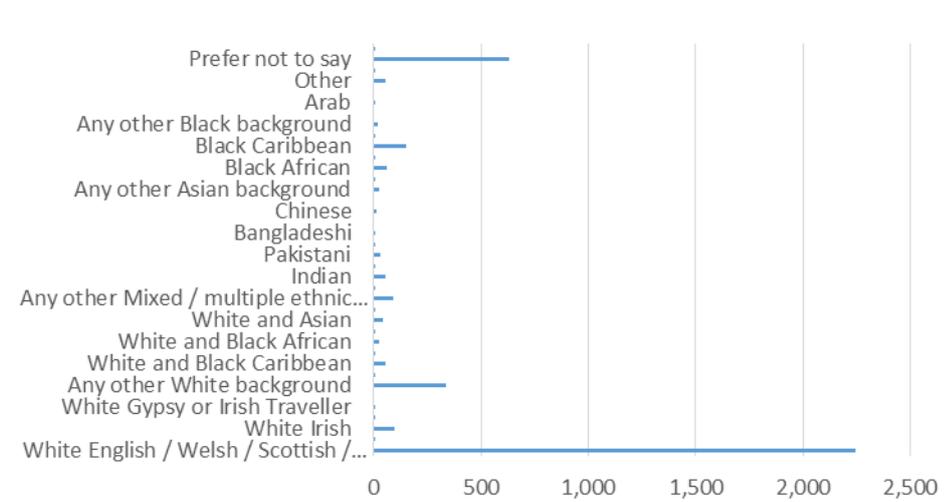
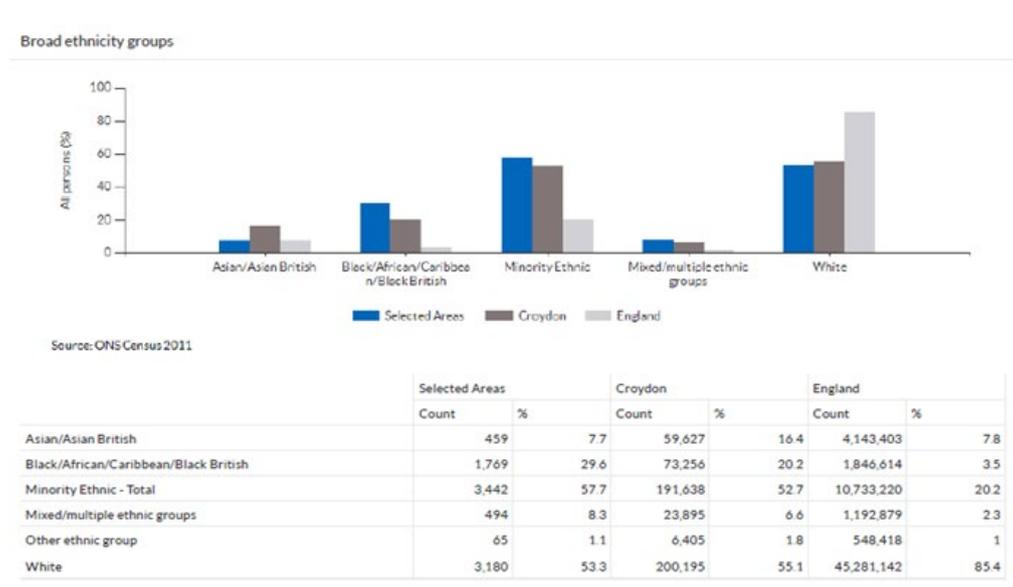
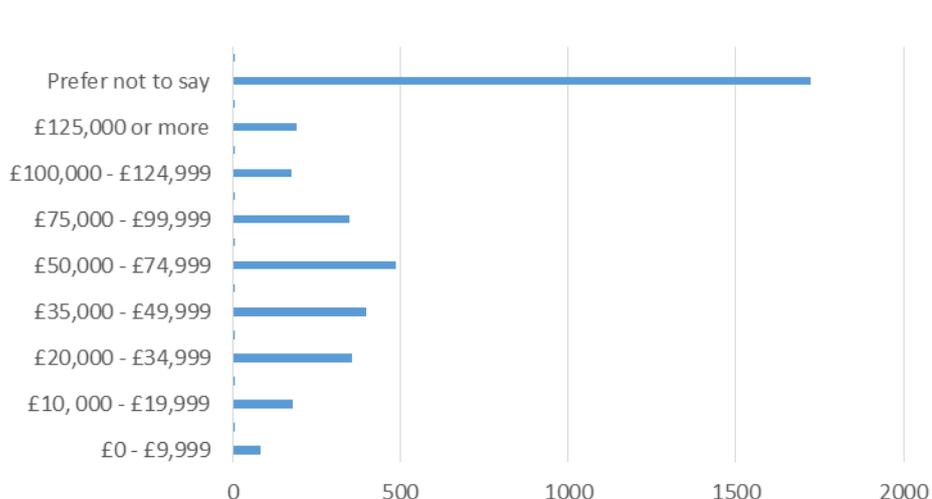


Figure 5.4 Race and Ethnicity of Population Profile within the Temporary LTN, Croydon and England (see Equality Analysis)



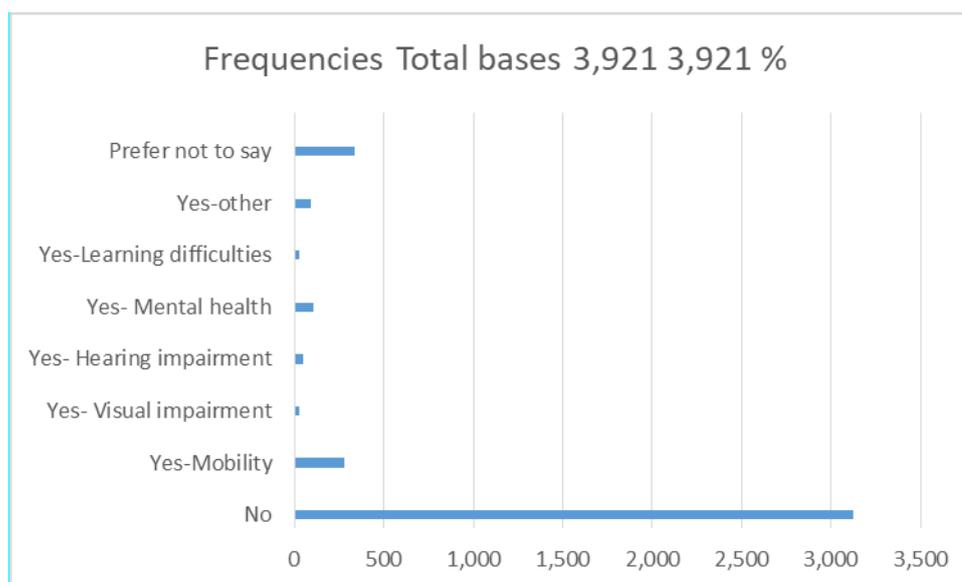
5.24 The Household income of responders appears to be higher than the average within the area of the Temporary LTN, TfL's 'Strategic Neighbourhood Analysis' indicating that the area of the Temporary LTN is amongst the top 20 to 30% most deprived in England

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.

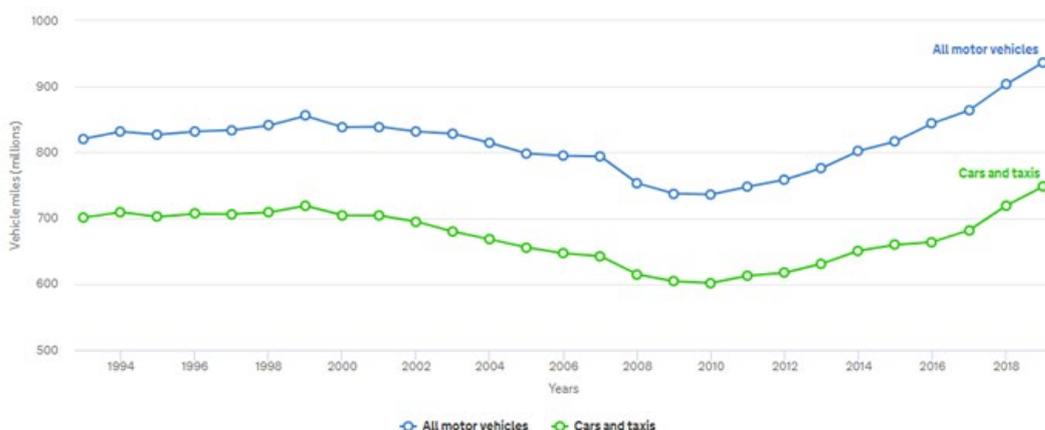
⁷ <https://roadtraffic.dft.gov.uk/regions/6>

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.

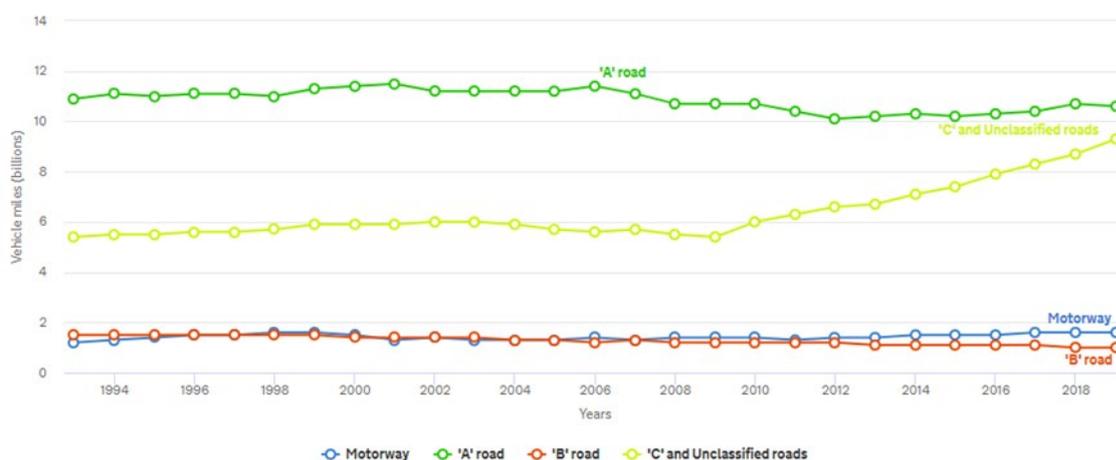
Annual traffic by vehicle type in Croydon

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

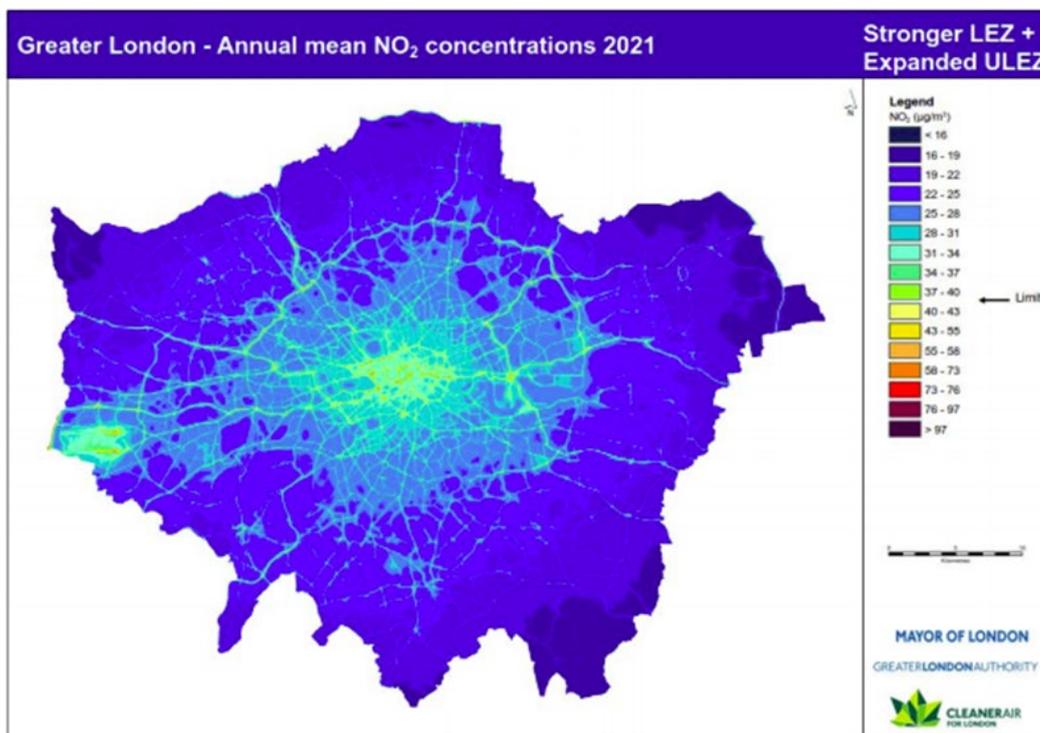


Figure 7.2 Annual mean NO₂ concentrations in 2025 with stronger LEZ and Expanded ULEZ

¹⁰ https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-3b/user_uploads/integrated-impact-assessment.pdf

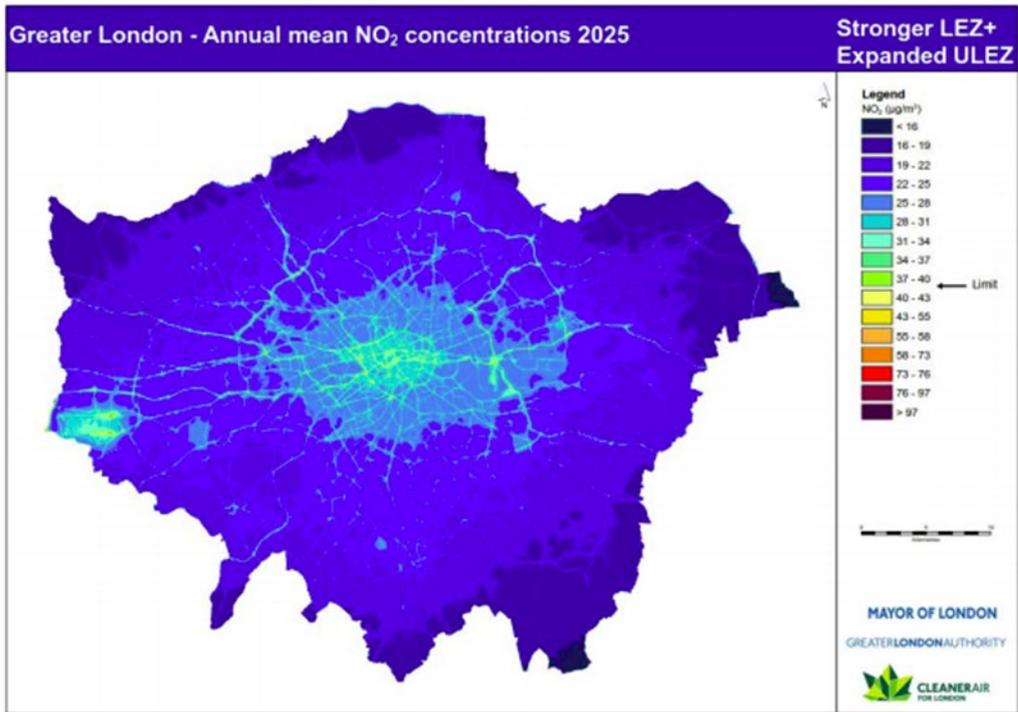
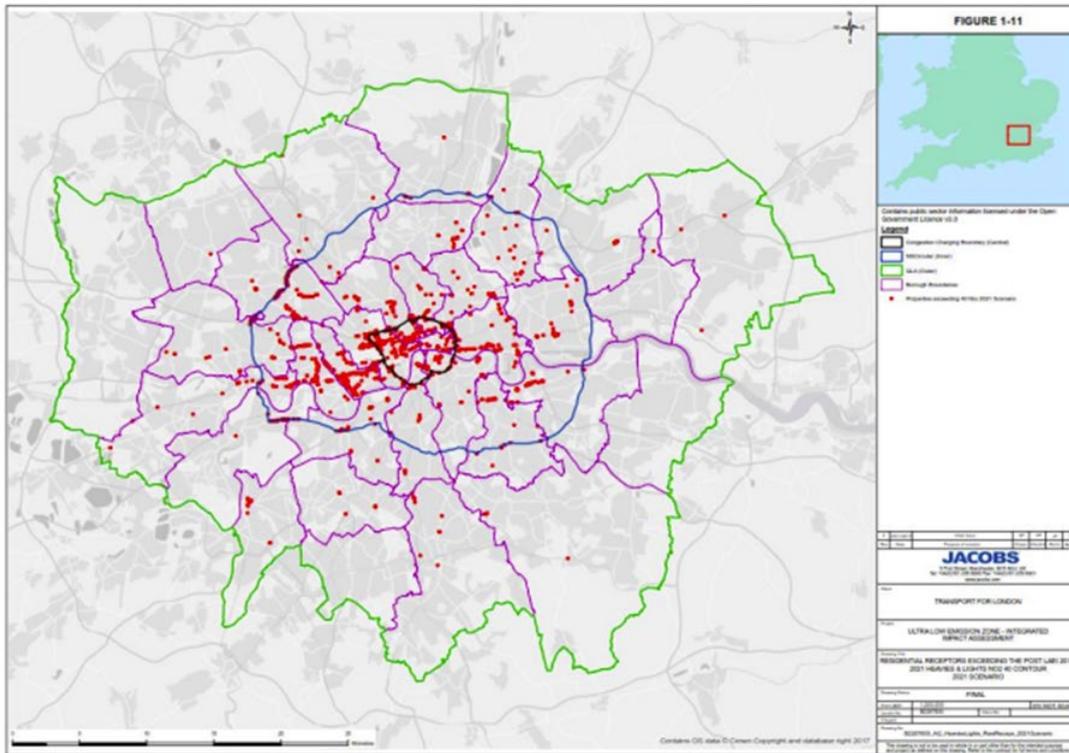


Figure 7.3 Residential receptors exceeding the post LAEI 2025 NO_2 $\mu\text{g}/\text{m}^3$ Contour in year 2021



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