

# LONDON BOROUGH OF CROYDON

<b>REPORT:</b>	<b>CABINET</b>	
<b>DATE OF DECISION:</b>	<b>24th July 2024</b>	
<b>REPORT TITLE:</b>	<b>Report on the Informal Consultation on Six Healthy School Streets Schemes (Group 5)</b>	
<b>CORPORATE DIRECTOR:</b>	<b>Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration &amp; Economic Recovery</b>	
<b>LEAD OFFICER:</b>	<b>Jayne Rusbatch, Head of Highways &amp; Transport</b>	
<b>LEAD MEMBER:</b>	<b>Councillor Scott Roche, Cabinet Member for Streets &amp; Environment</b>	
<b>KEY DECISION?</b>	<b>Yes</b>	Key Decision reference: 1324EM REASON: Affecting 2 or more wards
<b>CONTAINS EXEMPT INFORMATION?</b>	<b>NO</b>	
<b>WARDS AFFECTED:</b>	<b>(MULTIPLE) Addiscombe West, Crystal Palace &amp; Upper Norwood, New Addington North, New Addington South, Purley Oaks &amp; Riddlesdown, Thornton Heath, and Waddon</b>	

## 1 SUMMARY OF REPORT

- 1.1 The purpose of this report is to outline the results of the informal consultation undertaken on the introduction of six new Healthy School Streets (HSS) schemes.
- 1.2 The Council has implemented 40 Healthy School Streets schemes (over four groups) on the public highway since 2017. The aim of the Healthy School Streets programme is to reduce traffic volumes, increase road safety and improve air quality outside school entrances by encouraging parent to travel to school using more sustainable modes of travel. The Council has received funding, via Transport for London's Local Implementation Plan, to implement more Healthy School Streets and consulted informally on the introduction of six new schemes during May 2024.
- 1.3 The table below lists, and gives details of the six Healthy School Street schemes in Group 5:

Ref	School	Affected Road(s)	Ward
APPLEGART H/HSS2024	Applegarth Academy	<ul style="list-style-type: none"> <li>Bygrove</li> <li>Brierley</li> <li>Elmside</li> </ul>	New Addington North
BEULAH/HSS 2024	Beulah Infant and Nursery Schools	Furze Road	Thornton Heath
JOHN WOOD/HSS2024	John Wood Primary School	<ul style="list-style-type: none"> <li>Dartnell Road (between Rymer Road and Bredon Road)</li> <li>Jesmond Road (north of Bredon Road)</li> <li>Exeter Road</li> <li>Laurier Road</li> </ul>	Addiscombe West
RIDDLESDO WN/HSS2024	Riddlesdown Collegiate	<ul style="list-style-type: none"> <li>Dunmail Drive</li> <li>Honister Heights</li> <li>Derwent Drive</li> <li>Grisedale Gardens</li> <li>Eskdale Gardens</li> <li>Ingleboro Drive (east of Buttermere Gardens)</li> </ul>	Purley Oaks & Riddlesdown
ROWDOWN/HSS2024	Rowdown Primary School	<ul style="list-style-type: none"> <li>Callery Down Crescent (between Windham Avenue and Stowell Avenue)</li> </ul>	New Addington South
HARRISPW/HSS2024	Harris Primary Academy Purley Way	<ul style="list-style-type: none"> <li>Propeller Crescent (between no. 1 and junction with Purley Way by school)</li> </ul>	Waddon

**1.4** The table below gives details of the Healthy School Street scheme at Harris City Academy Crystal Palace, originally in Group 4. The informal consultation for this Healthy School Street was originally conducted during Autumn 2022 but due to an error, some residents within the consultation area were not consulted and the scheme was not implemented. This Healthy School Street does not form part of the consultation analysis in this report but is included in the recommendations as the results of the reopened consultation will be considered alongside the other reopened consultation at Harris Primary Academy Purley Way.

Ref	School	Affected Road(s)	Ward
HSS19	Harris City Academy Crystal Palace	<ul style="list-style-type: none"> <li>Sylvan Road (between No. 14/16 and Maberley Road)</li> <li>Kitley Gardens</li> <li>Cantley Gardens</li> <li>Maberley Road (between Mowbray Road and Sylvan Road)</li> <li>Windall Close</li> </ul>	Crystal Palace & Upper Norwood

## 2 RECOMMENDATIONS

For the reasons set out in the report and its appendices, Cabinet, is recommended:

**2.1** To proceed to statutory consultation for the following Healthy School Street schemes detailed in this report, and, following consideration of the statutory consultation

responses, to delegate the decision to proceed to implementation to the Corporate Director of Sustainable Communities, Regeneration & Economic Recovery:

School	Affected road(s)	Section	Ref
Applegarth Academy	Bygrove	Entire length of road	APPLEGARTH/HS S2024
Beulah Infant and Nursery School	Furze Road	Entire length of road	BEULAH/HSS2024

**2.2** To delegate the decision to proceed to statutory consultation, following further engagement with Calleydown Shortbreak Children's Home, and implementation, following the statutory consultation stage, to the Corporate Director of Sustainable Communities, Regeneration & Economic Recovery for the following Healthy School Street scheme detailed in this report:

School	Affected road(s)	Section	Ref
Rowdown Primary School	Calley Down Crescent	Between Windham Avenue and Stowell Avenue	ROWDOWN/HSS2024

**2.3** To delegate the decision to proceed to statutory consultation, following a further informal consultation stage, and implementation, following the statutory consultation stage, to the Corporate Director of Sustainable Communities, Regeneration & Economic Recovery for the following Healthy School Street schemes detailed in this report, which includes Harris City Academy Crystal Palace School Street having moved from Group 4 to Group 5 of the Healthy School Streets programme:

School	Affected road(s)	Section	Ref
Harris Primary Academy Purley Way	Propeller Crescent	Between no. 1 and junction with Purley Way by school	HARRISPW/HSS2024
Harris City Academy Crystal Palace	a) Sylvan Road b) Kitley Gardens c) Cantley Gardens d) Maberley Road (southern section) e) Windall Close	a) Between No. 14/16 and Maberley Road b) Entire length of road c) Entire length of road d) Between Mowbray Road and Sylvan Road e) Entire length of road	HSS19

**2.4** Not to proceed with the following Healthy School Street schemes detailed in this report:

School	Affected road(s)	Section	Ref
John Wood Primary School	a) Dartnell Road b) Jesmond Road c) Exeter Road d) Laurier Road	a) Between Rymer Road and Bredon Road b) North of Bredon Road c) Entire length of road d) Entire length of road	JOHNWOOD/HSS2024
Riddlesdown Collegiate	a) Dunmail Drive b) Honister Heights c) Derwent Drive d) Grisedale Gardens e) Eskdale Gardens f) Ingleboro Drive	a) Entire length of road b) Entire length of road c) Entire length of road d) Entire length of road e) Entire length of road f) East of Buttermere Gardens	RIDDLESDOWN/HSS2024

### 3 REASONS FOR RECOMMENDATIONS

- 3.1** For the reasons set out below in this report officers conclude that two new Healthy School Streets are implemented under permanent Traffic Management Orders, subject to statutory consultation and delegated approval process.
- 3.2** For the reasons set out below in this report officers conclude that one new Healthy School Streets, following further engagement with a local children’s home, are considered under the delegated approval process, once those informal consultations have been completed.
- 3.3** For the reasons set out below in this report officers conclude that two new Healthy School Streets, currently undergoing a re-opened informal consultation are considered under the delegated approval process, once those informal consultations have been completed.
- 3.4** The previous four groups of Healthy School Streets were introduced as Experimental Traffic Management Orders (ETMOs), involving an initial informal consultation to determine which schemes would proceed. An ETMO was then made, implementing schemes immediately. With this method, the statutory consultation period took place during the first six months of the ETMO, which could run for a maximum of 18 months.
- 3.5** In March 2024, IPSOS published the report titled “Low Traffic Neighbourhoods – Research Report”, concluding that these schemes generally have low awareness with residents and recommends improvements to community engagement, awareness and understanding. Therefore, it is proposed that the Group 5 schemes will be implemented with a permanent Traffic Management Order, rather than the experimental as for the previous HSS schemes. This would require a 3-week statutory consultation period to take place prior to any of the HSS schemes being implemented. Following the analysis of the responses received during the statutory consultation period, the decision to proceed to implementation would be made under delegated powers. Officers feel that this approach would be more democratic allowing residents’ opinions to be fully considered before any changes are made on the ground.

- 3.6** The five schemes recommended to be implemented meet and support several of Croydon's strategic transport objectives as per the Local Implementation Plan, along with those within the Executive Mayor of Croydon's Business Plan and lastly the Mayor of London's Transport Strategy.

## **4 BACKGROUND AND DETAILS**

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

casualties in Croydon, a 15% rise compared to the previous year. Croydon also has the highest number of recorded casualties for child pedestrians in London. Implementing Healthy School Streets across the borough would contribute to increasing road safety and reduce road casualties.

- 4.7** Healthy School Streets are not an isolated device. It supports the educational and information efforts of the Council's Road Safety and School Travel Planners, including their coordination with the TfL Explorers (Primary Schools) and TfL Pioneers (Secondary Schools) and Living Street's WoW Travel Tracker initiatives. TfL Explorers and Pioneers aims to inspire young Londoners to travel to school sustainably, actively, responsibly, and safely by championing walking, scooting and cycling. Living Streets is a charity that inspires the nation to walk more. WOW is a pupil-led initiative where children self-report how they get to school every day using the interactive WOW Travel Tracker.
- 4.8** For further information on the policy objectives and the evidence in support for implementation of Healthy School Streets please refer to sections 2 – 3 of the Schools Streets Traffic Management Advisory Committee Report (TMAC) dated May 2019, which can be found [here](#).
- 4.9** The proposed Healthy School Streets will operate Monday – Friday 8am – 9:30am and 2pm – 4pm during term time only, as determined by the respective school. They will be enforced by ANPR cameras at the entrance to the school street zones.
- 4.10** Residents living within the Healthy School Street zone will be eligible to apply for up to three exemption permits so that they can drive through the restricted zone without receiving a Penalty Charge Notice. Staff members of the school can also apply for an exemption permit.
- 4.11** The scheme will be enforced using Automatic Number Plate Recognition (ANPR) cameras, which will only capture the registration of vehicles entering the Healthy School Street during operational hours. Vehicles without a valid exemption permit that enter the Healthy School Street during operational times will be issued with a Penalty Charge Notice.
- 4.12** It is expected that any of the HSS which proceed to implementation would become operational in late autumn 2024. To mitigate against drivers receiving Penalty Charge Notices without advance knowledge of the scheme the Council would issue warning notices in place of Penalty Charge Notices for the first 2 weeks of operation. This is intended to provide motorists with a fair opportunity to adapt to the new arrangements.
- 4.13** Highways officers have considered the requirements of Regulation 9 of the Local Authorities Traffic Orders (Procedures) (England and Wales) Regulations 1996 and will consider whether it is appropriate to hold a public inquiry following consideration of any objections received in respect of the proposed permanent orders.

## 5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1 Not proceeding to implementation (subject to statutory consultation) with Applegarth Academy and Beulah Infant and Nursery School Healthy School Streets** - Officers are of the view that not proceeding to implementation with the two schemes would be a missed opportunity to improve the quality of the environment within close proximity of schools, hence not delivering an element of the Executive Mayor of Croydon's Business Plan. Proceeding to implementation via the statutory consultation route would provide those affected by the schemes with a further opportunity to express their views. Officers would then address any objections that come forward at this second stage.
- 5.2** The Healthy School Street Programme is a long-term goal aimed at changing travel behaviour from motorised transport to active travel which has significant health and wellbeing benefits. Adapting to a changing environment is a personal choice and this adaptation can also be influenced by society. Policy tools can be used to drive change forward and engendering a change in behaviour. If not progressed we will miss the opportunity to sow the necessary seeds of change which can realise the aspirations of the council, i.e. specifically Outcome 4 of the Executive Mayor of Croydon Business Plan in the long-term delivering a healthier and stronger community.
- 5.3 Proceeding to implementation (subject to statutory consultation) with Rowdown Primary Healthy School Street without engagement with Calleydown Shortbreak Children's Home** – Officers are of the view that proceeding to the statutory consultation stage for this Healthy School Street without further engagement with the children's home could be detrimental to the operation of the business. During the informal consultation stage, the children's home expressed concern that the restricted zone could have an adverse effect on their residents and visitors, due to the nature of their disabilities. A site meeting will be arranged for officers to gain a better understanding of the daily transport movements of the children's home and to assess the impact of implementing a Healthy School Street at Calley Down Crescent.
- 5.4 Not proceeding with considering the responses to the re-opened informal consultation for Harris Primary Academy Purley Way and Harris City Academy Crystal Palace Healthy School Streets** - Officers are of the view that, as per 5.1, not proceeding to consider the responses to the re-opened informal consultation on these two schemes would also be a missed opportunity to improve the quality of the environment within close proximity of schools, hence not delivering an element of the Executive Mayor of Croydon's Business Plan. Following this additional informal consultation stage, residents and businesses would have a further opportunity to express their views through a future statutory consultation stage.
- 5.5 Proceeding to implementation (subject to statutory consultation) with John Wood Primary Healthy School Street** – Due to the close proximity of this school to The Robert Fitzroy Academy on Brampton Road, introducing a Healthy School Street at

John Wood Primary School would have an adverse effect on a larger area of the local road network, which would impact road safety and air quality.

- 5.6 Proceeding to implementation (subject to statutory consultation) with Riddlesdown Collegiate Healthy School Street** – Riddlesdown Collegiate is a secondary school and residents have raised concerns with the level of anti-social behaviour in the area, particularly given that several of the pedestrian routes to and from the school are across green spaces which do not have public lighting. The local road network and footways are also very steep. Although served by public transport, there is only one bus route which operates three buses an hour during peak times which does not offer pupils an effective sustainable alternative to travelling by car. Therefore, if a Healthy School Street was implemented at this location, it is unlikely to encourage modal shift to sustainable transport.

## **6 CONSULTATION**

- 6.1** The informal consultation is an early engagement stage with the purpose of gauging opinions and receiving feedback to verify the initial assumptions for a proposal. It is an invitation to residents, businesses, and owners/operators of amenities in the locality to contribute their first-hand experiences and observations that are otherwise not obviously available to the local authority officers. The consultees were invited to suggest changes to the initially suggested zone layout if they wish to do so.
- 6.2** The consultation launched on 8<sup>th</sup> May 2024 and expired at midnight on 28<sup>th</sup> May 2024. It was published on all digital platforms in tandem with announcements made about the consultation through a council press release and newsletter. In total 7,939 leaflets were distributed to addresses within 250m of the Applegarth Academy, Beulah Infant and Nursery School, John Wood Primary School, Riddlesdown Collegiate and Rowdown Primary Schools. Recipients were given details on the particular scheme being proposed in their area as well as details of how to access the Council's Get Involved platform to view the questionnaire and submit a response. In total 1,084 questionnaire responses were received to these five schemes, representing a response rate of 14%. The average response rate for a consultation in Croydon is 10%.
- 6.3** Details of the proposed Healthy School Street zones for the informal consultation undertaken in May 2024 are outlined below:
- Applegarth Academy (APPLEGARTH/HSS2024) is a primary school located at the northern end of New Addington and accessed from several residential culs-de-sac via a network of estate footways and public footpaths. Under the proposal the culs-de sac allowing closest access to the school would be restricted i.e. Bygrove, Brierley, and Elmside.
  - Beulah Infant and Nursery School (BEULAH/HSS2024) is situated on Furze Road, Thornton Heath. It shares a site with Beulah Junior School, though that school's entrance is on Beulah Road. Under the proposal the Healthy School Street would



be introduced on Furze Road only, as the large number of commercial premises makes an HSS proposal impractical for Beulah Road.

- Harris Primary Academy Purley Way (HARRISPW/HSS2024) is located on Propeller Crescent, which operates one-way. Due to the Waddon Leisure Centre Car Park located at the north end of Propeller Crescent, the HSS proposal would restrict Propeller Crescent between No. 1 and its junction with Purley Way (adjacent to the school).
- John Wood Primary School (JOHNWOOD/HSS2024) is located on Dartnell Road, with another minor entrance at the cul-de-sac end of Jesmond Road. The HSS proposal would restrict all of Exeter Road, all of Laurier Road, the cul-de-sac end of Jesmond Road and part of Dartnell Road (between Bredon Road and Rymer Road).
- Riddlesdown Collegiate (RIDDLESDOWN/HSS2024) is the only secondary school under consideration within this Group 5 HSS batch. The proposal would restrict Dunmail Drive, Honister Heights, Grisedale Close, Grisedale Gardens, Derwent Drive, Eskdale Gardens, and part of Ingleboro Drive (between Eskdale Gardens and Buttermere Gardens).
- Rowdown Primary School (ROWDOWN/HSS2024) is on Calley Down Crescent in the southern section of New Addington, with two entrances, both on Calley Down Crescent. The proposed HSS would restrict Calley Down Crescent between the junctions of Stowell Avenue and Windham Avenue.

**6.4** Due to a technical error, some addresses close to the proposed the Harris Primary Academy Purley Way Healthy School Street did not receive a consultation leaflet. Similarly, some addresses within the Harris City Academy Crystal Palace Healthy School Street did not receive a consultation leaflet when this consultation was held in February 2023. As a result, these consultations will be reopened for an additional three weeks in July 2024 to allow these residents an opportunity to give their views. The responses received relating to this scheme will be analysed and considered together once the extended consultation finishes and reported in a future delegated approval paper.

**6.5** Details of the re-opened informal consultation, to take place in July 2024, are outlined below:

- Harris City Academy Crystal Palace (HSS19) is located on Maberley Road, close to the boundary with the London Borough of Bromley. The HSS proposal includes Sylvan Road (to start at the boundary of No. 14/16 Sylvan Road to allow access to the Phil Edwards Centre and St John the Evangelist Church), Kitley Gardens, Cantley Gardens, Windall Close and Maberley Road (between Mowbray Road and Sylvan Road).
- Harris Primary Academy Purley Way (HARRISPW/HSS2024) is located on Propeller Crescent, which operates one-way. Due to the Waddon Leisure Centre Car Park located at the north end of Propeller Crescent, the HSS proposal would restrict

Propeller Crescent between No. 1 and its junction with Purley Way (adjacent to the school).

**6.6** 250m consultation boundary: To fully understand and appreciate the consultation analysis as presented in this report, it is important to note the consultation boundary, its definition and categorisation.

- 250m boundary: the Council has chosen to consult properties that fall within 250 metres of the extents of the proposed healthy school street scheme by sending them a consultation leaflet. This is consistent with the method used previously when consulting on the existing 40 school streets.
- For analysis purposed those properties that fall within 250m from the extents of the school street proposal that would have received a consultation leaflet are categorised as responses from properties '**Within the area**'. Those responses received from persons beyond the 250m consultation boundary are categorised as responses from '**Outside the area**', this could be response from those who live, work, or study anywhere in Croydon and beyond. It is an undefined area as anyone who feels that they may be impacted by the proposals can respond.
- Analysis of responses from those within the consultation boundary and those outside is important because depending on how close they live, work, or study to the proposals, the impacts you feel or perceive could vary, therefore the feedback given will be different.

**6.7** The Council has an active communications and engagement team that made announcements and publications in relation to the consultation via various means and these have been detailed below:

- Your Croydon: <https://news.croydon.gov.uk/safer-journeys-to-school-for-more-croydon-young-people/>
- I Love Croydon Facebook page
- The Council has a dedicated Healthy School Streets website (<https://www.croydon.gov.uk/healthy-school-streets>) with background information on the Council's Healthy School Street programme
- A Healthy School Streets email was available for scheme-related queries – [healthyschoolstreets@croydon.gov.uk](mailto:healthyschoolstreets@croydon.gov.uk)

**6.8** The table below summarise the replies received to the online Get Involved survey during the informal consultation carried out in May 2024. As stated previously, this report does not consider the responses to Harris Primary Academy Purley Way.

Ref	School	Disagree/ Strongly Disagree	Agree/ Strongly Agree	No opinion
APPLEGARTH/HS S2024	Applegarth Academy	63.0% (68)	37.0% (40)	0.0% (0)
BEULAH/HSS2024	Beulah Road Infant and Nursery	64.4% (107)	34.3% (57)	1.2% (2)

Ref	School	Disagree/ Strongly Disagree	Agree/ Strongly Agree	No opinion
JOHNWOOD/HSS 2024	John Wood Primary School	78.4% (204)	20.7% (54)	0.8% (2)
RIDDLESDOWN/H SS2024	Riddlesdown Collegiate	72.3% (324)	27.2% (126)	0.4% (2)
ROWDOWN/HSS2 024	Rowdown Primary School	62.5% (55)	36.4% (32)	1.1% (1)

**6.9** The tables below provide summary results across the 5 schemes:

**Consultation Sentiment for Healthy School Streets (Group 5) within the proposed restriction zone**

Ref	School	Disagree / Strongly Disagree	Agree / Strongly Agree	No Opinion
APPLEGARTH/HS S2024	Applegarth Academy	51.3% (20)	48.7% (19)	0.0% (0)
BEULAH/HSS2024	Beulah Road Infant and Nursery	53.8% (7)	46.2% (6)	0.0% (0)
JOHNWOOD/HSS 2024	John Wood Primary School	70.7% (29)	29.3% (12)	0.0% (0)
RIDDLESDOWN/H SS2024	Riddlesdown Collegiate	58.6% (58)	41.4% (41)	0.0% (0)
ROWDOWN/HSS2 024	Rowdown Primary School	38.1% (8)	61.9% (13)	0.0% (0)

**Consultation Sentiment for Healthy School Streets (Group 5) within consultation area**

Ref	School	Disagree / Strongly Disagree	Agree / Strongly Agree	No Opinion
APPLEGARTH/HS S2024	Applegarth Academy	51.4% (36)	48.6% (34)	0.0% (0)
BEULAH/HSS2024	Beulah Road Infant and Nursery	64.7% (88)	34.6% (47)	0.7% (1)
JOHNWOOD/HSS 2024	John Wood Primary School	77.2% (176)	21.9% (50)	0.9% (2)
RIDDLESDOWN/H SS2024	Riddlesdown Collegiate	68.3% (153)	31.3% (70)	0.4% (1)
ROWDOWN/HSS2 024	Rowdown Primary School	52.4% (33)	46.0% (29)	1.6% (1)

**Consultation Sentiment for Healthy School Streets (Group 5) outside consultation area**

Ref	School	Disagree / Strongly Disagree	Agree / Strongly Agree	No Opinion
APPLEGARTH/HS S2024	Applegarth Academy	84.2% (32)	15.6% (6)	0.0% (0)

Ref	School	Disagree / Strongly Disagree	Agree / Strongly Agree	No Opinion
BEULAH/HSS2024	Beulah Road Infant and Nursery	63.3% (19)	33.4% (10)	3.3% (1)
JOHNWOOD/HSS 2024	John Wood Primary School	87.5% (28)	12.5% (4)	0.0% (0)
RIDDLEDOWN/HSS2024	Riddlesdown Collegiate	76.1% (181)	23.5% (56)	0.4% (1)
ROWDOWN/HSS2024	Rowdown Primary School	88.0% (22)	12.0% (3)	0.0% (0)

**6.10** The tables above shows that the greatest support for the proposals originate from respondents that live within the proposed restricted zones as they would benefit from reduced traffic and congestion. The support for the schemes decreases significantly for respondents who live outside the consultation area, most likely from those who choose to drive to school and would be adversely affected by the restrictions.

**6.11** The results in the tables above show that a majority of those who responded are opposed to the introduction of HSS schemes, however officers believe that this is primarily attributed to the following three elements:

- Low response rate – the consultation only received an average response rate of 14%. Although this is favourable compared to similar consultations it does indicate that the large majority of those consulted did not engage with the consultation process suggesting that further engagement may be required. It is important that the community is able to inform the Council of their views on the schemes in another way. The mechanism to achieve this will be to implement the schemes via permanent Traffic Management Orders (TMOs), subject to statutory consultation which invites comments on or objections to the final proposal prior to making a decision whether to implement the schemes.
- Displacement of traffic on surrounding roads – there is a perception that this would occur, but this is often only in the short-term. If introduced, officers would measure the impacts of the scheme through extensive monitoring, and work with the schools to encourage driver behaviour change to more sustainable modes of transport.
- Access issues for deliveries etc. – the Council operates a flexible permit exemption scheme, allowing residents and businesses to register vehicles without permits up to 23:59 on the day the exemption is required.

**6.12** The key themes raised for Applegarth Academy were:

Theme raised	Sentiment	Mentions
Pushing all vehicles onto alternate driving routes will increase air pollution and congestion on surrounding roads	Negative	17
Will reduce congestion and improve parking for residents	Positive	16

Theme raised	Sentiment	Mentions
Inconvenient for parents who have to drive to pick up/ drop off children / creates significant walking distances for parents of small children/ infants	Negative	12
Displacement of parking issues to nearby areas	Negative	11
Concern that programme is about raising money	Negative	10
Residents / parents / pupils with disability may require vehicle access, or require carers to have vehicle access	Negative	8

**6.13** The table above shows that the respondents were concerned with displaced traffic onto the surrounding roads but residents within the proposed school street zone expect the scheme to reduce congestion and improve parking for residents. Given the size of the proposed school street zone, respondents were concerned with the walking distance to the school.

**6.14** Positive responses were received from respondents living on Bygrove, suggesting that this road suffers from parking stress at the moment. However, there have been objections from respondents on Brierley and Elmside who do not want any restrictions on their road.

**6.15** The key themes raised for Beulah Infant and Nursery School were:

Theme raised	Sentiment	Mentions
Traffic and congestion will worsen around the school street	Negative	39
Existing parking issues on neighbouring roads that need to resolved	Negative	16
Will have a negative impact on local businesses	Negative	9
Will improve road safety	Positive	8
Concern that programme is about raising money	Negative	8
Not necessary as there are no traffic/congestion issues	Negative	8

**6.16** The main issue from these respondents was a concern that traffic and congestion would worsen around the school.

**6.17** The key themes raised for John Wood Primary School were:

Theme raised	Sentiment	Mentions
Pushing all vehicles onto alternate driving routes will increase air pollution and congestion on surrounding roads	Negative	82

Theme raised	Sentiment	Mentions
Displacement of parking issues to nearby areas	Negative	36
Disagree with the scheme extents and timings of the scheme	Negative	34
Change the scheme extents	Query	32
Concern that programme is about raising money	Negative	26
Not necessary as there are no traffic / congestion issues	Negative	24
Inconvenient for parents who have to drive to pick up/ drop off children / creates significant walking distances for parents of small children/ infants	Negative	24
Consider spending the money on alternate schemes e.g speed reductions, lollipop ladies	Query	21
Inconvenient for local residents	Negative	17

**6.18** This proposed Healthy School Street received many responses, with concerns of congestion and parking moving onto surrounding areas.

**6.19** The key themes raised for Riddlesdown Collegiate were:

Theme raised	Sentiment	Mentions
Traffic/ congestion will worsen around the school street	Negative	129
Will have detrimental effects on the social welfare of residents	Negative	42
One way system should be implemented	Negative	40
Impacts on delivery drivers, taxis, contractors, and residents' visitors	Negative	37
Concern that programme is about raising money	Negative	25
Public transport alternatives can be unreliable	Negative	28
Residents/parents/students with disability may require vehicle access, or require carers to have vehicle access	Negative	21
Will improve road safety	Positive	20
Consideration for earlier start time for the school street	Negative	20
Proposed School Street hours are excessive	Negative	20
Concerns for students walking during darkness in winter months	Negative	18
Parking issues will worsen with the scheme in place	Negative	17
Local roads not suitable for students walking and cycling due to steep inclines	Negative	17
Area around school is not safe for students to walk due to antisocial behaviour	Negative	10

**6.20** This proposed Healthy School Street received the most responses, expressing concern with traffic and congestion around the school street which could affect the social welfare

of residents. The respondents have suggested that a one-way system is implemented instead of a restricted zone which could improve traffic flow.

**6.21** Respondents have raised the issue with antisocial behaviour around the school and many of the pedestrian approaches to the school involve crossing public green spaces which are not lit, presenting a perception of danger during the darker winter months. As local roads are also steep, this would further discourage sustainable travel to school should the Healthy School Street be implemented.

**6.22** The key themes raised for Rowdown Primary School were:

Theme raised	Sentiment	Mentions
Traffic/ congestion will worsen around the school street	Negative	21
Will improve residents' parking access	Positive	14
Residents / parents / pupils with disability may require vehicle access, or require carers to have vehicle access	Negative	8
The scheme will have detrimental effects on the social welfare of residents	Negative	7

**6.23** Respondents around Rowdown Primary School were concerned that traffic would worsen around the school street but support the improvement in parking for residents.

**6.24** Calleydown Shortbreak Children's Home, located at No. 47A Calley Down Crescent, has expressed concern that implementing a Healthy School Street could adversely affect residents and visitors, due to the nature of their disabilities. They have requested a site visit to better understand their operations.

**6.25** An analysis of the responses received is outlined below. The objections were categorised into 50 themes and the following five themes have been identified as those most commonly raised by respondents.

**6.26 Theme 1: Traffic/congestion will be transferred onto surrounding roads**

Officers acknowledge that that when a new scheme is first implemented, some traffic displacement is experienced on surrounding streets. However, this dissipates over time as drivers change their behaviour in response to the scheme and either choose to travel by alternative means or stay away from the restricted zone. Where an HSS is to be introduced, both traffic and air quality will be monitored.

**6.27 Theme 2: Displacement of Parking issues to nearby areas**

Some parking displacement may occur in the area surrounding an HSS as there will be a proportion of drivers who refuse to travel sustainably. However, over time, it is expected that the parking would be dissipated over a wider network of surrounding roads. Displacement would only occur for unexempt vehicles arriving during the operational times of the HSS. Commuter parking before the morning drop off period

would not be affected and residents would not be directly affected, as they are expected to apply for Resident Exemptions.

### **6.28 Theme 3: Concern that programme is about raising money**

Penalty Charge Notices (PCNs) are levied on unexempt motorists driving through an HSS during the restricted time periods. Residents living within the restricted zones are eligible for exemptions and would be required to register their vehicles via the Council's Healthy School Streets website.

At the start of the Healthy School Street zone, there will be large Pedestrian and Cycle Zone sign plates advising unexempt drivers that they should not enter the zone unless they have a permit. There will also be advanced warning signs prior to the school street zone to warn drivers of the school street. The Council is not legally permitted to use traffic and parking schemes as a revenue raising exercise and any surplus income from enforcing such schemes is required to fund the Freedom Pass and to fund further improvements and maintenance to the highways network.

### **6.29 Theme 4: Impacts on welfare of residents due to restrictions on delivery drivers, taxis, and visitors**

Residents within an HSS are entitled to obtain exemption permits for carers, visitors with mobility issues, and for unplanned essential visits such as boiler repair. Permits may be issued for 1 day, 1 week, or 1 month, depending on the length of time required. Exemptions are also available for visits from healthcare workers. These exemptions are provided free of charge and can be applied for up to 23:59 on the day that the exemption is required.

### **6.30 Theme 5: Concern with scheme extents and/or timings**

The operational hours of school streets in Croydon are identical across all HSS, in the expectation that this may minimise any potential confusion amongst drivers. Most of the comments about scheme extents came from respondents in the vicinity of John Wood School. As this proposed HSS is located close to another primary school (The Robert Fitzroy Academy), there is a high likelihood that motorists avoiding the HSS would end up driving past The Robert Fitzroy Academy creating extra congestion in this area. It would not be appropriate to implement a Healthy School Street in close proximity to another primary school and proposing a Healthy School Street to incorporate both schools would inconvenience a large area of residents resulting in a greater percentage of respondents opposing the scheme. Therefore it is not recommended to proceed with the Healthy School Street at John Wood Primary School.

### **6.31 Following the consultation analysis, the recommendations for the Healthy School Streets Group 5:**



Ref	School	Recommendation	Comments
APPLEGART H/HSS2024	Applegarth Academy	Proceed to statutory consultation subject to revised school street zone	Reduce size of school street zone to include Bygrove only
BEULAH/HS S2024	Beulah Infant and Nursery Schools	Proceed to statutory consultation	Proposed school street zone to remain as per proposals
JOHN WOOD/HSS 2024	John Wood Primary School	Not to proceed	
RIDDLESDO WN/HSS202 4	Riddlesdown Collegiate	Not to proceed	
ROWDOWN/ HSS2024	Rowdown Primary School	Undertake engagement with Calleydown Shortbreak Children's Home and seek approval to proceed to statutory consultation	Proposed school street zone to remain as per proposals
HARRISPW/ HSS2024	Harris Primary Academy Purley Way	Analyse responses following re-opening of informal consultation and seek approval to proceed to statutory consultation	Proposed school street zone to remain as per proposals
HSS19	Harris City Crystal Palace	Analyse responses following re-opening of informal consultation and seek approval to proceed to statutory consultation	Previous HSS Group 4 scheme. Reduce size of school street zone on Sylvan Road to commence outside No. 14/16

## 7 CONTRIBUTION TO EXECUTIVE MAYOR'S BUSINESS PLAN

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

## 8 IMPLICATIONS

### 8.1 FINANCIAL IMPLICATIONS

- 8.1.1 The cost of the scheme implementation, including making up permanent Traffic Management Orders, ANPR cameras, civil works and traffic monitoring for up to five schemes would be approximately £180k. The capital budget for the equipment and

works is currently sitting within the Capital Parking budget (CAP39). Schemes funded by the Department for Transport's (DfT) Active Travel Fund through TfL or funded by TfL and implemented using an Experimental Traffic Order (ETO) cannot be removed using LIP funding or TfL funding.

- 8.1.2** If motorised vehicles, without exemption permits, were to enter the pedestrian and cycle zone they would be contravening the motorised vehicle restriction and would be subject to Penalty Charge Notice (PCN). Vehicles are able to drive out of the school street zone at any time without penalty. Details of how to apply for exemptions are provided to residents and businesses within the school street zone via letter prior to implementation of the scheme and detailed on the Council's School Street webpages. Surplus income generated from PCNs is ringfenced for purposes detailed in Section 55 of the Road Traffic Regulation Act 1984, which includes for example transport initiatives and the Freedom Pass.
- 8.1.3** The delivery of the two Healthy School Streets, and the potential delivery of a further three Healthy School Streets recommended to take forward, is consistent with the budget approval by the Council for the 2024/25 financial year.

## **RISKS**

- 8.1.4** If the outcome of this report was to not proceed with the recommendations, this would result in a reduction of the projected income from 2024-25 onwards. However, this is not a relevant consideration in respect of whether or not such schemes are to proceed to implementation or not under the Road Traffic Regulation Act and supporting regulations. Also, it is recognised that School Street compliance will change over time, and income will therefore reduce. However, the schemes are expected to be self-financing and bring important value through their road safety and air quality objectives.
- 8.1.5** Where Healthy School Streets are not made permanent the Council could be obliged to return to Transport for London the related grant income received for their development and implementation under experimental powers.

## **OPTIONS**

- 8.1.6** Substituting the ANPR camera enforcement of the proposed School Street schemes with an elevated physical enforcement presence by Civil Enforcement Officers and using the CCTV smart car to enforce the school zigzags would be more resource demanding and less effective – i.e. would not represent best value.
- 8.1.7** Comments approved by: William Zellerbach, Finance Manager SCRER, on behalf of Allister Bannin, Director of Finance (Deputy s151), 11/07/2024

## **8.2 LEGAL IMPLICATIONS**

- 8.2.1** The Road Traffic Regulation Act 1984 (RTRA) and the Local Authorities' Traffic (Procedure) (England and Wales) Regulations 1996 (LATOPR 1996) establish the procedures for making a traffic regulation order.
- 8.2.2** In making such Orders, the Council must follow the procedures set out at Schedule 9, Part III of the RTRA and detailed in the LATOPR 1996. The LATOPR 1996, prescribe inter alia, specific publication, consultation and notification requirements that must be strictly observed. It is incumbent on the Council to take account of any representations made during the consultation stage and any material objections received to the making of the proposed Order, must be reported back to and considered by the decision maker before an Order is made.
- 8.2.3** In determining whether or not to make a traffic management order, the Council is required, under Regulation 9 of the LATOPR to consider whether it is under a duty under regulation 9(3) to hold a public inquiry before making an order. Even where an inquiry is not mandated, the Council may still choose to hold an inquiry to consider objections before making any other order. The report details highways officers' consideration of these elements.
- 8.2.4** By virtue of section 122 of the Road Traffic Regulation Act 1984 (RTRA), the Council must exercise its powers under the RTRA so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway having regard to:
- The desirability of securing and maintaining reasonable access to premises;
  - The effect on the amenities of any locality affected and the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
  - The national air quality strategy;
  - The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
  - Any other matters appearing to the local authority to be relevant.
- 8.2.5** The RTRA is not a fiscal measure nor is its purpose revenue raising. In considering whether or not to approve the recommendations within the report the Council must have proper regard to the matters set out at section 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision. The Court of Appeal (in Trail Riders Fellowship v Hampshire County Council [2019] EWCA Civ 1275 (18 July 2019)) examined the relationship between section 122 and a council's traffic management order-making powers and established that the approach should be for the decision-maker to: have in mind the section 122(1) duty; then have regard to factors which may point in favour of imposing a restriction on movement of traffic and pedestrians (including all the factors in section 1); and finally balance the various considerations and come to the appropriate decision.

- 8.2.6** Section 16 of the Traffic Management Act 2004 imposes 'The Network Management Duty', requiring a local traffic authority to manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives:
- a. securing the expeditious movement of traffic on the authority's road network; and
  - b. facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.
- 8.2.7** The action which the authority may take in performing that duty includes, in particular, any action which they consider will contribute to securing:
- a. the more efficient use of their road network; or
  - b. the avoidance, elimination or reduction of road congestion or other disruption to the movement of traffic on their road network or a road network for which another authority is the traffic authority. For these purposes, 'traffic' includes pedestrians.
- 8.2.8** The Greater London Authority Act 1999 ("GLA 1999") places a duty on each London local authority to have regard to the Mayor of London's Transport Strategy when exercising any function. This therefore includes the exercise of its Traffic Management Duty (pursuant to s16 of the Traffic Management Act 2004) and when deciding whether to make a traffic order.
- 8.2.9** Under section 159 of the GLA 1999 Transport for London (TfL) may give financial assistance to a London local authority by way of a grant, loan or other payment, to provide safe, integrated, efficient and economic transport facilities or services to, from or within Greater London.
- 8.2.10** In exercising its powers under section 159, TfL may have regard to any financial assistance previously given and the use made by the authority of such assistance. TfL may also impose conditions on any financial assistance it provides, including conditions for repayment in whole or in part in specified circumstances.
- 8.2.11** In taking decisions and bringing forward these proposals, regard should be had to the provisions of the Human Rights Act 1998. In particular, the provisions of Article 1, of the First Protocol protection of property and Article 8, right to respect for private and family life. In relation to Article 8, right to respect for private and family life has a broad interpretation and extends to being in a public place if there is a reasonable expectation of privacy there. This right can be interfered with where lawful, necessary and proportionate to protect a number of other concerns including public safety and health. These human rights should be considered. To the extent that it is considered that they are infringed the proposals should only go ahead if it is considered that the infringement is necessary and proportionate.

**8.2.12** When considering the Public Sector Equality Duty (PSED) under Section 149 of the Equality Act 2010, decision makers must evidence consideration of any potential impacts of proposals on groups who share the protected characteristics, before decisions are taken. This is detailed in Section 8.3 and Appendix B.

**8.2.13** Where Automatic Number Plate Recognition (ANPR) is used, the Council must ensure it adheres to the Investigatory Powers Commissioner's Office Guidance (previously Office of the Surveillance Commissioner) and Information Commissioner Guidance, where appropriate. Officers will need to ensure that data protection matters, including the use of ANPR are addressed via the necessary data protection impact assessments.

**8.2.14** Statutory guidance published by the Secretary of State for Transport under section 87 of the Traffic Management Act 2004 (TMA) "Statutory guidance for local authorities in England on civil enforcement of parking contraventions", October 2022 provides that for good governance, enforcement authorities (such as the Council) need to forecast revenue in advance. But raising revenue should not be an objective of civil parking enforcement, nor should authorities set targets for revenue or the number of Penalty Charge Notices (PCNs) they issue.

**8.2.15** Enforcement should run their enforcement operations (both on- and off-street) efficiently, effectively and economically. The income from on-street charging and any penalty charge payments received (whether for on-street or off-street enforcement) must only be used in accordance with section 55 (as amended) of the Road Traffic Regulation Act 1984. London authorities must keep an account of all income and expenditure in respect of on-street parking places and their functions as enforcement authorities, within paragraphs 2 and 3 of schedule 7 to the Traffic Management Act 2004. The Road Traffic Act 1984 is not a fiscal measure but if an authority makes a surplus on its on-street parking charges and on-street-and-off-street enforcement activities, it must use the surplus in accordance with the detailed legislative provisions and restrictions in section 55 (as amended) of the Road Traffic Regulation Act 1984.

**8.2.16** Comments approved by Kiri Bailey Head of Commercial, Housing and Litigation and Deputy Monitoring Officer on behalf of the Director of Legal Services and Monitoring Officer. (Date: 04/07/2024)

### **8.3 EQUALITIES IMPLICATIONS**

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

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

**8.3.2** An Equalities Impact Assessment (EqIA) has been completed for the introduction of the Permanent TMOs for the School Streets, and those school streets that have not been recommended to be taken forward, and is included in Appendix B.

**8.3.3** The School Streets operational concept is unchanged since they were first introduced in 2017. This project is intended to restrict access for motor traffic except resident permit holders, cyclists, emergency services and certain other groups such as carers and those with disabilities. The impact will benefit the more vulnerable – such as pregnant mothers, children, those with debilitating respiratory illnesses, with secondary health benefits for the wider communities.

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

#### Positive impacts

- Implementing the five healthy school streets would provide a safer environment outside these schools, which would encourage active travel not just for school pupils and their parents/guardians, but also residents of the local community. This would provide a positive impact for all nine of the protected characteristics.
- More women accompany their children to school compared to men so would benefit more from the reduced congestion, increased road safety and improved air quality.
- There is evidence that air quality affects children and young people and therefore the Healthy School Streets would help to address this inequality. However, older people, those with disabilities and pregnant women would also benefit from improved air quality. Air quality analyses of the existing Healthy School Streets within the borough demonstrate that air quality improves during the restricted time periods compared to the school holidays.
- There have been objections to the proposed Healthy School Street at Riddlesdown Collegiate, raising concern regarding anti-social behaviour, lack of frequent bus services and steep footways. As these factors would unlikely encourage modal shift to sustainable transport, this Healthy School Street has not been recommended to be taken forward to statutory consultation and therefore would not adversely affect school children.
- The proposed Healthy School Street at John Wood Primary School has not been recommended to be taken forward to statutory consultation. Given its close proximity to The Robert Fitzroy Academy, implementing a restricted zone would impact the local road network, affecting road safety and could discourage active travel from all users.

#### Negative impacts

- There may be individuals who are not aware that they could be eligible for an exemption even in limited special circumstances. Residents who have registered carers are able to apply for a permit for the carer's vehicle. As a mitigation measure the council will inform the public of the potential exemptions they may be able to apply for.
- People who do not speak English or have poor English skills may struggle to access information about the school street operation and how to apply for an exemption permit. The Council will ensure that there are interpreting services to support these residents.
- Pregnant residents who drive to the school but are not eligible for an exemption permit would be required to park further away and continue their journey by walking. As a mitigation measure the council can issue temporary exemptions on a case-by-case basis if needed.

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

## **8.4 DATA PROTECTION**

**8.4.1** A Data Protection Impact Assessment (DPIA) has been undertaken for the collection of responses for the future statutory consultation stage, and can be found in Appendix C. The DPIA states that the processing of personal data as part of the statutory consultation will remain secure as it will be processed by nominated project officers and their appointed consultants. The information will be used to produce a report on the results of the consultation, but all responses will be anonymised.

**8.4.2** If any of the Healthy School Streets proceed to implementation, a separate DPIA will be prepared by the Parking Team to address the collection, processing and retention of Vehicle Registration Marks (VRMs) for the purpose of enforcement.

**8.4.3** Comments approved by Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration & Economic Recovery.

## **9 APPENDICES**

<b>Appendix A</b>	Informal Consultation Analysis Report
<b>Appendix B</b>	Equalities Impact Assessment
<b>Appendix C</b>	Data Protection Impact Assessment

## **10 BACKGROUND DOCUMENTS**

None