

LONDON BOROUGH OF CAMDEN	WARDS: Frognal Ward
REPORT TITLE St Margaret's School and St Luke's Church of England School Healthy School Street Scheme (SC/2025/34)	
REPORT OF Director of Environment and Sustainability	
FOR SUBMISSION TO Cabinet Member for Planning and a Sustainable Camden	DATE 27 May 2025
STRATEGIC CONTEXT <p>We Make Camden is our joint vision for the borough, developed in partnership with our community. The proposals for a trial Healthy School Street scheme for St Margaret's School and St Luke's Church of England School, outlined in this report, help meet a key ambition of We Make Camden, that Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency. Through encouraging and enabling active travel (particularly walking, wheeling, scooting and cycling) these proposals also contribute to the strategic ambition that Camden communities support good health, wellbeing and connection for everyone so that they can start well, live well, and age well.</p> <p>The Way We Work is the Council's response to We Make Camden. The proposals in this report meet a key ambition that Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the Climate Emergency.</p> <p>The proposed St Margaret's School and St Luke's Church of England School Healthy School Street Scheme also contributes to the key objectives in the Camden Transport Strategy, Camden Clean Air Strategy and Clean Air Action Plan, Climate Action Plan, and the Mayor's Transport Strategy and to the objectives of Healthy School Streets programme.</p>	
SUMMARY OF REPORT <p>This report seeks approval from the Cabinet Member for Planning and a Sustainable Camden to implement a trial Healthy School Streets scheme and to publish a notice of proposals in respect of other permanent Safe and Healthy Streets measures in the vicinity of St Margaret's School and St Luke's Church of England School in Frognal ward.</p> <p>A public consultation on the proposals detailed in this report was undertaken between 26 February 2024 and 18 March 2024.</p> <p>The proposals include a trial Healthy School Street timed motor vehicle restriction around both schools to assess whether the scheme will reduce traffic volumes and improve road safety and air quality in the vicinity of the schools, as well as encouraging pupils and parents/carers to walk, cycle or scoot to school (sustainable, active, healthy travel) without causing undue adverse effects. In addition, permanent measures are proposed to improve pedestrian accessibility</p>	

and climate resilience, including widening pavements to provide more space for pedestrians and to shorten crossing distances, and adding planting and cycle stands on the existing pavements in front of St Luke's Church of England school.

This report follows a consideration of relevant policies, data collected during the development of the scheme, an Equality Impact Assessment, and a public consultation on the proposals, the results of which have informed officers' recommendations in Section 2 of this report of amended designs for approval from those consulted on.

Local Government Act 1972 – Access to Information

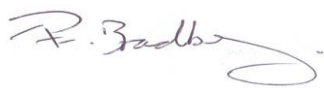
No documents that require listing were used in the preparation of this report.

Contact Officer: Karl Brierley, Safe and Healthy Streets Team Manager
5 Pancras Square, London N1C 4AG,
Tel: 020 20 7974 5317
Email: Karl.Brierley@camden.gov.uk

RECOMMENDATIONS

That the Cabinet Member for Planning and a Sustainable Camden, having considered this report, the Equality Impact Assessment (Appendix D), the public Consultation Summary Report (Appendix A), and having had due regard to the needs set out in section 149 of the Equality Act (2010) and subject to compliance with relevant statutory requirements and detailed design:

- (i) Approves the recommendation to implement the trial timed Healthy School Street outside St Margaret's School and St Luke's Church of England School;
- (ii) Approves the recommendation to publish a notice of proposals in respect of the permanent Safe & Healthy Streets measures in the locality;
- (iii) Delegates authority to the Chief Engineer to take any further decisions relating to the detailed design and implementation elements of the scheme;
- (iv) Delegates authority to the Director of Environment and Sustainability, following consultation with the Cabinet Member for Planning and a Sustainable Camden, to take any further decisions required to deliver the trial scheme and on whether to retain, amend or remove the trial Healthy School Street scheme at the end of its trial period; and
- (v) Delegates authority to the Director of Environment and Sustainability, following consultation with the Cabinet Member for Planning and a Sustainable Camden, to take any further decisions required to implement the permanent Safe & Healthy Streets measures in the locality having considered any objections received.



Signed:

Richard Bradbury, Director of Environment and Sustainability

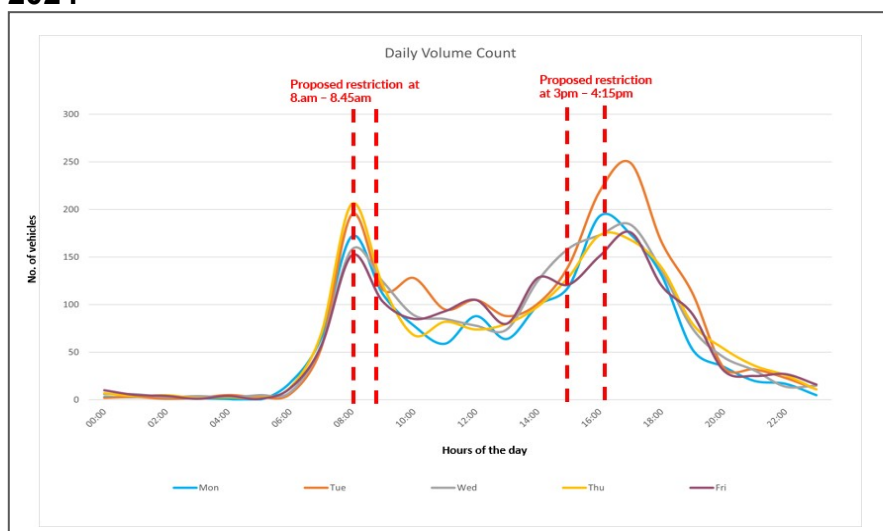
Date: 14 May 2025

1. CONTEXT AND BACKGROUND

- 1.1. This report seeks approval from the Cabinet Member for Planning and a Sustainable Camden for proposals for a trial Healthy School Street (HSS) timed motor vehicle restriction scheme for St Margaret's School and St Luke's Church of England School (hereafter named as St Luke's CE School) and to publish a notice of proposals in respect of other permanent measures, in Frognal Ward.
- 1.2. A trial HSS scheme (with timed motor vehicle restrictions) is proposed on the streets around St Margaret's School and St Luke's CE School, specifically on Kidderpore Avenue, Kidderpore Gardens, Ferncroft Avenue and Hollycroft Avenue. If approved, the restrictions would be in place between 8:15 am to 9:15 am and 3:15 pm to 4pm on Kidderpore Avenue, between Platt's Lane and Penrose Gardens; and on Ferncroft Avenue, Kidderpore Gardens and Hollycroft Avenue (between Ferncroft Avenue and Rosecroft Avenue) between 8am to 8:45am and 3pm to 4:15pm. Both sets of restrictions would operate Monday to Friday during school term time only. They would operate as a trial for up to 18 months under an Experimental Traffic Order (ETO).
- 1.3. Permanent Healthy Streets measures are also proposed that include walking, cycling, and greening improvements in the vicinity of both the schools.
- 1.4. The overall aims of the traffic scheme and other measures are to reduce traffic volumes and improve road safety and air quality in the vicinity of the schools, as well as encouraging pupils and parents/carers to walk, cycle or scoot to school (sustainable, active, healthy travel) and to improve pedestrian accessibility and climate resilience. The proposals contained in this report have been amended by officers, from those consulted upon, following careful consideration of the responses received from respondents during the consultation.
- 1.5. The recommendations in this report are in accordance with the [Camden Transport Strategy](#) (CTS), Review of Progress since 2019 and Three Year Delivery Programme for 2022/23 to 2024/25 ([SC/2022/34](#)) report, and the [Camden Transport Strategy Delivery Plan 2025-28](#) and Local Implementation Plan ([SC/2024/32](#)) report. These reports include delivery plans for achieving goals set in the CTS which in turn seeks to deliver the outcomes set in the Mayor's Transport Strategy to create Healthy Streets – streets where more people walk, cycle and use public transport. The proposed HSS scheme aligns with the Council's policy commitment to roll out HSS schemes to all feasible schools by 2026 as outlined in the three year CTS Delivery Plan 2025-2028. The proposed scheme and measures align with our key strategies and plans, including We Make Camden, the CTS, the [Camden Climate Action Plan](#) and [Clean Air Action Plan](#).
- 1.6. Enabling walking and cycling in the borough are key strategic outcomes for the Council, as set out in multiple strategy documents. The Camden Transport Strategy (CTS), adopted in 2019, has 7 objectives, three of which are directly aligned with the proposals for this scheme (objectives 1, 2 & 4) as considered in more detail in sections 2.8 to 2.12 below. The proposed scheme is within the [CTS delivery plan for 2025 to 2028](#). The scheme also contributes to the [Camden Climate Action Plan](#) and [Clean Air Action Plan](#) and the [Mayor's Transport Strategy \(MTS\) 2018 \(revised 2022\)](#).

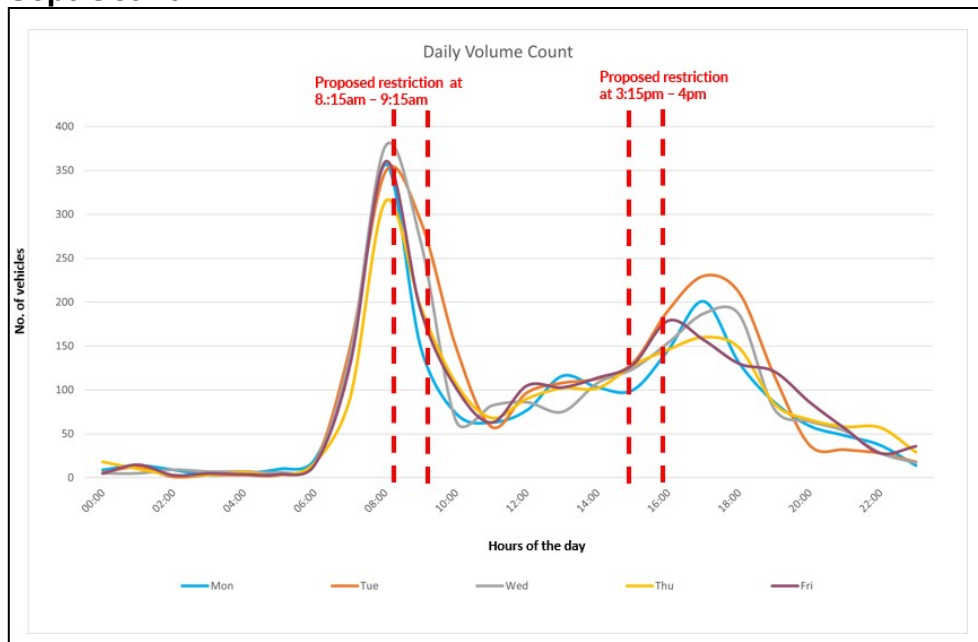
- 1.7. The Council's HSS programme has been in operation in Camden since 2016 and 32 schemes have been delivered to date covering 36 schools. Details of HSS schemes in Camden can be found [here](#). The aim of the programme is to address problems with parking, traffic congestion, road safety and air quality and to encourage journeys to and from school to be made on foot, by bike or scooting (sustainable, active, healthy travel) by restricting motor vehicles during school opening and closing times and where possible to provide wider active travel, road safety and public realm improvements such as the proposed permanent Healthy Streets measures outlined in section 2.
- 1.8. A [public consultation](#) on the proposals took place between 26th February 2024 and 18th March 2024. The consultation approach, the feedback received to the consultation and officers' responses are set out in Section 5 below and in more detail in **Appendix A** (Consultation Report). The proposals as consulted on can be viewed on the [Consultation webpage](#) and in **Appendix F** (consultation materials). In response to concerns raised during the public consultation officers recommend amending the proposals as set out in Section 2 below and in **Appendix C** (post consultation drawings), based on a review of the policy context, monitoring data and other sources of information, and an analysis of the impacts that these proposals might have on persons with protected characteristics under the Equality Act (2010).
- 1.9. Traffic count data collected in 2024 at a number of locations in the area across an average week during school term time shows that traffic levels on the proposed restricted streets are at some of the highest levels during school run times. Figure 1 below shows data collected on Ferncroft Avenue where St Margaret's is located, and Figure 2 shows Kidderpore Avenue where St Luke's CE School is located.

Figure 1: Ferncroft Avenue Average Weekday Daily Traffic Levels, Sept/Oct 2024



- 1.10. For Ferncroft Avenue, traffic data (in Figure 1) shows that motor vehicle volumes rise at school drop off times in the morning to over 177 vehicles (weekday daily average). It also shows that traffic increases at school pick up times in the afternoon, with over 134 vehicles (weekday daily average) and continues to increase until the early evening.

Figure 2 – Kidderpore Avenue Average Weekday Daily Traffic Levels, Sept/Oct 2024



- 1.11. For Kidderpore Avenue, traffic data (in Figure 2) shows a significant volume of over 352 vehicles (weekday daily average) at school drop off times in the morning; there are also high volumes of over 122 vehicles (weekday daily average) at pick-up times in the afternoon. The traffic data also shows that the combined 5 day daily average speed on Kidderpore Avenue is 19.1mph and 21.1mph on Ferncroft Avenue.
- 1.12. The traffic count data collected in September 2024 shows that traffic levels have increased since the original 2022 survey data outlined in the public consultation information, on both Ferncroft Avenue and Kidderpore Avenue during both the proposed morning drop-off times and afternoon pick-up times. Compared to the 2022 data, the 2024 surveys for Kidderpore Avenue show that traffic levels have increased by 37% at drop-off school times in the morning, although only by 3.5% during the afternoon pick-up times. For Ferncroft Avenue, traffic surveys for 2024 indicate that traffic volumes have increased by 30% during morning drop-off times and by 9% during afternoon pick-up times.
- 1.13. The presence of motor traffic on our streets creates an inherent danger to road users and a potential for conflict, in particular with [pedestrians and cyclists, who are most at risk](#). Reducing this danger and risk is fundamental to the Mayor of London's Vision Zero approach to road safety, which the Council fully supports as reflected in the CTS. Vision Zero aims to eliminate all deaths and serious injuries from London's roads by 2041; it adopts a pro-active approach to road safety which seeks to minimise the risk and reduce the source of road danger by reducing the dominance of motorised traffic, in order to prevent collisions from occurring in the first place.
- 1.14. The Council has developed its own strategic, local targets which are set out in Table 5.2 in the action plan section of the CTS. These targets have been developed in recognition of their importance in monitoring and assessing indicators which are not contained in the MTS outcomes but which are

important to the seven objectives in the CTS. A particular focus is on vulnerable road user casualties: pedestrians and cyclists comprised the largest proportion of casualties categorised as Killed and Seriously Injured (KSIs) in Camden, at the time of preparing the CTS at 44% and 33% respectively. The most recent casualty data available from TfL for Camden, for the three year period 1 October 2021 to September 2024, shows that this continues to be the case at 38% and 33% respectively.

- 1.15. Reducing road risk by restricting motorised traffic as part of the HSS programme is therefore central to the Council's approach to improving road safety and making it safer to walk or cycle to school. Monitoring reports from other HSS schemes in the borough show that they can also help to reduce collisions and casualties where they have occurred.
- 1.16. High motorised traffic volumes also create an intimidating environment and a *perception* of road danger where people don't feel safe, and which deters them from walking and cycling, particularly for children and young people, as documented in the Evidence Report to the CTS. By restricting and reducing the dominance of motorised traffic, the Council's HSS schemes help to overcome a key barrier to more children walking, cycling or scooting, and undertaking independent journeys to school.
- 1.17. [Air pollution presents the highest environmental risk to health](#), with motorised traffic a significant contributing factor. As set out in the most recent [London Atmospheric Emissions Inventory \(2022\)](#), based on data collected in 2019, the total contribution of road transport (all categories of vehicles) to NO_x (nitrogen oxides) is 30.9%; and to PM_{2.5} it is 19.6% in Camden. Motor vehicles also contribute 19% to carbon emissions (CO₂) in Camden. Although many roads in Camden now meet the 40µg/m³ annual mean legal limit for NO₂ they are all still higher than the 10µg/m³ World Health Organization annual mean guideline limit that Camden has committed to achieving borough-wide by 2034 at the latest. [Monitoring reports](#) show that other HSS schemes in the borough have helped to reduce air pollution around schools. If the proposals are approved, officers would monitor air quality in the vicinity of both schools during the trial period.
- 1.18. The scheme has been developed in line with the above to reduce traffic volumes and improve road safety and air quality in the vicinity of the schools and to create an environment that encourages sustainable, active travel choices with benefits for the wider community. This report provides details of the recommended proposals, a summary of officers' responses to feedback from the public consultations and analysis on the impacts of these proposals might have on persons with the nine protected characteristics under the Equality Act 2010. The strategic and policy alignments for these proposals can be viewed in **Appendix E** (Policy Alignments).

2. PROPOSALS AND REASONS

Proposals

- 2.1. The proposals as consulted on can be viewed in Appendix B (Consultation

drawing) and [the online consultation page](#).

- 2.2. As outlined in section 5.7 below and in **Appendix A** there was a high level of disagreement with the proposals consulted on both from within the consultation area and outside the consultation area, including a petition from a local group. In summary, the main concerns highlighted in the responses were:
- Motor vehicle access to Hampstead School of Art for students carrying large or heavy items.
 - Traffic displacement onto Hollycroft Avenue and other surrounding streets.
 - Access for taxis, service vehicles and emergency services.
 - Vehicles speeding in the area and suggestions for speed calming measures.
 - Young girls' safety as some respondents felt the HSS would make them walk in the dark and expose to dangers.
 - Some respondents did not receive flyers to notify them of the consultation.
- 2.3. After careful consideration of comments and feedback received during the consultation process, officers recommend amending the proposals as consulted on to address these concerns, as set out below and Table 1, and shown in **Appendix C** (post consultation drawings). In summary, the amended proposals include:
- Splitting the HSS scheme into two separate HSS zones, one for each school which would operate independently; this would enable each zone to operate independently, and to reduce the times of the restrictions, and to align with each school's drop off and pick up periods;
 - Amending the extent of the HSS zone on Kidderpore Avenue to operate between Platt's Lane and Penrose Gardens, to facilitate vehicle access to Hampstead School of Art at all times;
 - Reducing the HSS restriction times for St Luke's CE school on Kidderpore Avenue to mitigate the concerns raised by the school regarding the overly long HSS hours, to operate between 8.15am and 9.15am;
 - Reducing the HSS morning restriction times to 8:00am -8:45am to reflect the pick-up and drop off times of St Margaret's school on Ferncroft Avenue.
- 2.4. Significant changes to the proposals as consulted on include splitting the scheme into two separate zones and reducing the extent of the restrictions on Kidderpore Avenue. The consulted scheme proposed one HSS restriction zone covering both schools encompassing the whole of Kidderpore Avenue, Kidderpore Gardens and Ferncroft Avenue. As a result, the proposed HSS restriction times captured the drop off and pick up times for both schools as part of one scheme, operating between 7:45am – 9am and 3pm – 4:15pm.
- 2.5. In response to the concerns raised in the consultation, officers now recommend splitting the scheme into two separate HSS zones with different HSS times for each school. This includes reducing the HSS restriction zone for St Luke's CE School to the section of Kidderpore Avenue between Platt's Lane and Penrose Gardens, as illustrated in **Appendix C**. If approved, this would ensure that the Hampstead School of Art remains accessible by motor vehicles at all times, and which some consultation respondents raised as a key issue. In addition,

splitting the scheme enables reduced HSS restriction times to better suit the pick-up and drop off times of each school. This would also help mitigate the concern raised by St Luke's CE School about the long HSS restriction times.

- 2.6. The reduced extent of the proposed HSS would mean that addresses on Kidderpore Avenue, south of Penrose Gardens, which were located within the previous HSS zone as consulted on would no longer be part of an HSS restriction and required to apply for an exemption. However, they would not be able to drive through the proposed HSS restricted zone at northwestern end of Kidderpore Avenue, nor other restricted streets, and would only be able to enter/exit the street from Heath Drive.
- 2.7. In addition, officers propose to include the section of Hollycroft Avenue between Ferncroft Avenue and Rosecroft Avenue, within the HSS restriction zone for St Margaret's School. This is to respond to the concerns raised in the consultation by some residents on that street about traffic displacement and drop off at the junction of Ferncroft Avenue close to the school as well as vehicles turning at that junction. This means that residents on that section of Hollycroft Avenue would be part of the HSS restricted zone and would be eligible for an exemption. However, vehicles for visitors, deliveries and trades people to those addresses would not be permitted during the restricted times. For detailed information, please refer to [Healthy School Street webpage](#).
- 2.8. The details of consultation comments with officers' response can be viewed in **Appendix A** (Consultation Report). The recommended proposals are presented below for the Decision maker to consider and illustrated in **Appendix C** (Post Consultation drawings).

Table 1 Recommended changes to proposals based on the consultation feedback.

Location	Proposals as consulted on	Amended Proposals post consultation	Reasons for amendments
Kidderpore Avenue – St Luke’s CE School	A trial HSS scheme between 7:45am – 9am and 3pm – 4:15pm , Monday to Friday during school term times only, on the full length of Kidderpore Avenue between Platt’s Lane and Heath Drive.	A trial HSS scheme between 8:15 am – 9:15am and 3:15 pm – 4 pm , Monday to Friday during school term times only, on Kidderpore Avenue between Platt’s Lane and Penrose Gardens, only.	<p>After careful consideration of all the consultation responses, officers recommend reducing the geographic extent (the size) of the HSS restrictions and also reduce the timings of the HSS restrictions on Kidderpore Avenue. The proposed change in size means that there would now be two separate HSS restriction areas covering the two schools rather than one larger HSS restriction area.</p> <p>As discussed in section 2.4 – 2.6 above, reducing the extent of the restrictions on Kidderpore Avenue would, if approved, ensure that the Hampstead School of Art remains accessible by motor vehicles at all times, which was a key issue raised by respondents to the consultation.</p> <p>In response to the concerns raised by St Luke’s CE school regarding the long HSS restriction times, Officers recommend reducing the HSS the times to operate between 8:15am to 9:15am, and 3:15pm to 4pm, to reflect the pick-up and drop off times of St Luke’s CE school on Kidderpore Avenue only.</p> <p>To enable the proposed amended extent of the trial HSS, three shared use paid-for/resident parking bays around the junction with Penrose Gardens are proposed to be removed under an ETO to facilitate turning for vehicles at the start of the restriction at the junction. This is also proposed in response to the Road Safety Audit carried out for the revised proposals.</p> <p>It is also proposed to remove one resident parking bay opposite the junction with Kiddepore Gardens to keep that junction clear. This is to</p>

Location	Proposals as consulted on	Amended Proposals post consultation	Reasons for amendments
			<p>facilitate vehicles turning at that junction for drivers facing the proposed HSS restriction on Kiddepore Garden, and to exit Kiddepore Avenue.</p> <p>Detailed consultation comments and responses can be found in Appendix A and the amended proposals can be viewed in Appendix C (Post-Consultation Scheme Drawings).</p>
Kidderpore Gardens and Ferncroft Avenue, Hollycroft Avenue – St Margaret's School	A trial HSS scheme between 7:45 am – 9 am and 3 pm – 4:15 pm , Monday to Friday during school term times only, on the full lengths of Kidderpore Gardens and Ferncroft Avenue.	A trial HSS scheme between 8 am - 8:45 am and 3 pm – 4:15 pm , Monday to Friday, during school term times only, on Kidderpore Gardens (whole street), Ferncroft Avenue (whole street) and Hollycroft Avenue (between Ferncroft Avenue and Rosecroft Avenue).	<p>After careful consideration of all the consultation responses, officers recommend amending the extent of the trial HSS for St Margret's School to include Hollycroft Avenue within the HSS restriction zone. This change is proposed in response to concerns raised by some respondents to the consultation about displacement of traffic onto that street and school drop-off and vehicles turning on Hollycroft Avenue at the junction with Ferncroft Avenue.</p> <p>Officers also propose amending (reducing) the morning restriction times to 8:00am -8:45am to reflect the pick-up and drop off times of St Margaret's school on Ferncroft Avenue only. A detailed response to the related consultation comments is outlined in Appendix A.</p>
Ferncroft Avenue at the junction of Kidderpore Gardens	Permanently widening the pavement and extending the existing raised section of carriageway. To do this, we propose to remove 2 resident	No proposed change. Officers recommend proceeding with this proposal as consulted on, as outlined in Appendix A .	

Location	Proposals as consulted on	Amended Proposals post consultation	Reasons for amendments
	parking bays and reduce a further residents' parking bay by 1 metre.		
Kidderpore Avenue outside St Luke's CE school.	Plant two trees and add cycle stands on the previously widened pavement.	No proposed change. Officers recommend proceeding with the proposal as consulted on, outlined in Appendix A.	

Recommended scheme

2.9. The proposed amendments discussed in Table 1 above are listed below for the Decision Maker to consider:

(i) Proposed Trial Healthy School Street

- Introducing a trial (for up to 18 months) Healthy School Street; timed motor vehicle restrictions, Monday to Friday during school term only, for the following two HSS zones:
 - For St Luke's CE School on Kidderpore Avenue: between Penrose Gardens and Platt's Lane only, from 8:15am to 9:15am and from 3:15pm to 4pm, Monday to Friday school term time only. To facilitate the amended extent of HSS, three shared-use residents' and paid-for parking bays on Kidderpore Avenue, near the junction with Penrose Gardens, and one resident's bay opposite the junction with Kiddepore Gardens, would be removed as a trial, and
 - For St Margaret's School on Ferncroft Avenue: the whole street on Ferncroft Avenue, between Heath Drive and Platt's Lane, the whole street on Kiddepore Gardens between Kiddepore Avenue and Ferncroft Avenue, and on Hollycroft Avenue, between Ferncroft Avenue and Rosecroft Avenue, from 8am to 8:45am and 3pm to 4.15pm, Monday to Friday school term time only.

(ii) Proposed permanent safe and healthy streets measures

- Permanently widening the pavement on Ferncroft Avenue, at the junction with Kidderpore Gardens, and extending the existing raised section of the carriageway, to facilitate a safer crossing for pedestrians and slowing down vehicle speeds. To do this, it is proposed to remove 2 resident parking bays and reduce a further resident's parking bay by 1 metre, as set out in **Appendix C** (post consultation drawings).
- Planting two trees and adding cycle stands on the existing widened pavement on Kidderpore Avenue outside St Luke's CE school. It is also proposed to replace the surface material of the widened pavement (subject to detailed design) as set out on the drawings in **Appendix C** (post consultation drawings).

2.10. A detailed summary of related consultation comments together with officers' responses is provided in **Appendix A** (Consultation Report).

2.11. The trial HSS restrictions would be enforced by Automatic Number Plate Recognition (ANPR) cameras on Kidderpore Avenue, Ferncroft Avenue, Hollycroft Avenue and Kidderpore Gardens, and relevant signage on restricted streets. The signage would state the restriction times and the HSS signs would be closed during the school holidays when the scheme would not be operating. The following vehicles would be exempt from the timed trial Healthy School Street restrictions by applying for an exemption:

- Vehicles registered to properties and businesses on the sections of the streets within the timed restriction area (exemptions would need to be applied for and

agreed with the Council).

- Vehicles belonging to parents with a Blue Badge who have a pupil attending either school or parents/carers of pupils who have a disability that prevents them from walking, cycling, or scooting to either school (exemptions would need to be agreed with the Council).
- Emergency services such as ambulance, fire brigade or police, door to door services such as Plus Bus and Dial A Ride, home to school transport, and refuse collection vehicles and other statutory services will automatically be exempt.

2.12. School staff and visitors to the schools would not be exempt. General taxis and delivery vehicles would not be exempt, and such trips would need to be scheduled outside of the restricted times or the vehicles would need to be parked outside of the restricted area. However, exemptions can be applied for in exceptional circumstances, such as when elderly or disabled people may need essential taxi journeys during the restricted hours. All the requests for exemptions can be applied for by contacting the Healthy School Streets team over the phone or via email. If the scheme goes ahead, details of how to apply for an exemption would be posted to residents and businesses in the consultation area. Details of the Healthy School Street exemption policy can be viewed [here](#).

2.13. In line with our Cabinet-approved Healthy Streets consultation and decision-making approach, the proposed HSS timed motor vehicle restrictions and removal of parking on Kidderpore Avenue outlined in Table 1 above would be introduced as a trial under an Experimental Traffic Order (ETO) for a period of up to 18 months. This is to assess whether the scheme will reduce traffic volumes and improve road safety and air quality in the vicinity of the schools, as well as encouraging pupils and parents/carers to walk, cycle or scoot to school (sustainable, active, healthy travel) without causing undue adverse effects. Monitoring data would be collected during the trial to understand the impacts of the scheme on traffic levels and speeds, air quality, road traffic collisions, and other relevant data. If the scheme is approved and implemented under an ETO, we would get further feedback from residents and stakeholders during the trial period (and consideration of any statutory objections during the first 6 months of that trial). A further full public consultation would only be held if significant amendments to the trial scheme were proposed as part of any permanent measures.

2.14. During the trial period, officers would also undertake engagement with pupils, parents and teachers at both schools (subject to agreement from the schools to obtain their feedback on the trial). All of the monitoring data and feedback collected during the trial period would inform, alongside relevant policies, officer observations and any other relevant information, a decision about whether the scheme should be made permanent, kept with changes, or removed at the end of the trial.

2.15. If approved, the proposed permanent measures would be subject to detailed design and (further) Road Safety Audits. If any concerns are highlighted in these stages of the audit process, Officers would investigate further and respond to these accordingly.

2.16. If approved, permanent measures outlined in Table 1 above would be publicised in a notice of proposals. This TMO consultation would be expected to take place in late 2025.

- 2.17. The permanent measures would be subject to detailed design and (further) Road Safety Audits. If any concerns are highlighted in these stages of the audit process, officers would investigate further and respond to these accordingly.
- 2.18. Strategic and policy alignments for the above proposals can be found in **Appendix E**.

3. OPTIONS APPRAISAL

3.1. This report presents five options to the decision maker:

- **Option 1:** is to approve the recommended amended HSS proposals, as set out in Section 2 of this report, and progress with implementing all of those trial and permanent proposals.
- **Option 2:** is to reject all the proposals and implement no changes to the area around St Margaret's School and St Luke's CE School and do nothing at this time.
- **Option 3:** is to approve the implementation of the trial HSS scheme for both schools and reject the permanent Safe and Healthy Streets measures.
- **Option 4:** is to approve the permanent Safe and Healthy Streets measures and reject the trial HSS scheme.
- **Option 5:** is to approve the trial scheme and permanent measures consulted on without the proposed changes.

3.2. **Option 1** is recommended to the decision maker. Proceeding with this option will contribute to delivering Council policy and the Healthy School Streets programme in the following ways:

- Contribute towards policies 1, 2 and 3 in the Mayor's Transport Strategy and meeting objectives 1, 2 and 4 in the Camden Transport Strategy, alongside other policies such as the Mayor's Healthy Streets objectives, through
- prioritising active, healthy, and sustainable modes of travel such as walking and cycling
- Deliver the Cabinet approved CTS [Delivery Plan 2025-2028](#) and the Council's commitment to continue to implement Healthy School Streets with the vast majority of feasible schemes aiming to be delivered by 2026.
- Improve road safety for all people to encourage more people to walk, wheel, cycle and use scooters in the area;
- Improve pedestrian accessibility in line with the Council's Walking and Accessibility Action Plan;
- Deliver on recommendations made by the Citizen's Assembly on the Climate Crisis and related [Climate Action Plan](#) and [Clean Air Strategy and Clean Air Action Plan](#); and deliver improved air quality in the locality, as part of the Council's wider Clean Air Action Plan;
- Contribute towards meeting the objectives of We Make Camden which states ambitions that Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency. The proposals would also help respond to the impacts of climate change by encouraging a shift to active and sustainable modes of

travel.

- Deliver improvements to the look and feel of the area, increasing greenery and planting and making the area a more attractive place.
- Respond to the feedback received to the public consultation.

3.3. **Option 2** is not recommended as it does not contribute towards meeting relevant policies set out in the Mayor's Transport Strategy and Healthy Streets approach, We Make Camden, Camden's Transport Strategy, Climate Action Plan, and Clean Air Action Plan, and does not sufficiently respond to the specific issues as outlined in the consultation information and in this report.

3.4. **Options 3 and 4** are not recommended as these options, if approved, would not help deliver all the objectives of the proposals, nor sufficiently contribute towards meeting the Mayor's Transport Strategy and Healthy Streets approach, We Make Camden, Camden's Transport Strategy, Climate Action Plan, and Clean Air Action Plan and would not sufficiently respond to the specific issues as outlined in the consultation information and this report.

3.5. **Option 5** is not recommended as this option would not respond to the concerns raised in the consultation, as outlined in **Appendix A** and the reasons for design changes set out in Table 1 in section 2 above.

4. WHAT ARE THE KEY IMPACTS / RISKS? HOW WILL THEY BE ADDRESSED?

Positive Impacts

4.1. If approved, the proposed HSS restrictions are likely to result in reductions in motor vehicle levels on the streets around St Margaret's School and St Luke's CE School during the hours of restriction. The anticipated reduction in traffic outside the schools as a result of the scheme could help to improve road safety and walking, cycling and scooting conditions for school children, workers, and visitors to the area, and could help to improve air quality in these local streets with benefits for the wider community.

4.2. Monitoring data collected on other [HSS schemes](#) in Camden has shown that there can also be area-wide reductions in motor vehicles volumes following the implementation of schemes, and if approved, the scheme would be carefully monitored to understand its impacts on streets in the wider area. As the scheme would be implemented as a trial this would provide the opportunity to also collect further feedback from local residents and stakeholders and potentially make changes to the scheme if deemed necessary during the trial period.

4.3. A full assessment of the proposals' impact on the nine protected characteristics identified by the Equality Act 2010 was carried out and is included in **Appendix D**. The assessment has highlighted that there are many potential positive benefits for persons with protected characteristics associated with the proposed improvements in this scheme. Where potential negative impacts on individuals within protected characteristics have been highlighted, officers have explored these issues and provided comments/mitigations.

Negative Impacts & Mitigations

4.4. The potential negative impacts, and proposed mitigations are set out below.

Table 2 Impacts and mitigations

Issue	Mitigation
<p>Concerns raised during consultation that HSS restrictions could cause congestion and traffic displacement onto other nearby streets and increase air pollution.</p>	<p>If approved, further monitoring would take place on streets within the local area to assess the impact of the HSS. As the scheme would be introduced as a trial, further changes could be considered to address any negative impacts recorded. This would also allow residents and stakeholders to experience the scheme and provide further feedback. However, recent monitoring for other HSS schemes in Camden has shown that there can be reductions in traffic levels in the wider area following the implementation of such schemes and some scheme monitoring reports have also shown that support for these kinds of measures can grow once stakeholders have had the chance to experience them operating.</p>
<p>Concerns around the removal of parking</p>	<p>The proposed amended scheme as set out in Section 2 results in the removal of one resident parking space, and three shared use resident and paid for parking spaces on Kiddepore Avenue as a trial. This is to enable safe vehicle turning movements on Kiddepore Avenue at the junctions with Penrose Gardens and also at the junction with Kiddepore Gardens.</p> <p>In addition, it is proposed to permanently remove two resident parking bays and also to reduce an existing resident bay by one metre on Ferncroft Avenue, near the junction with Kiddepore Gardens in order to widen the pavement. This is to make the junction safer by improving sightlines and shorten the crossing distance while providing more space for pedestrians.</p> <p>The parking pressure data for Kiddepore Avenue shows that the ratio of permit holders to available parking spaces is only 38%. For Ferncroft Avenue, the ratio is 61%. This indicates that there are more parking spaces available than active parking permits held. In the wider CPZ (CA-S) the ratio is 58%. Therefore, it is expected that there would be sufficient remaining capacity both on Kiddepore Avenue and Ferncroft Avenue, and in the wider area to meet local residents' parking demand on streets in the scheme area.</p>

Issue	Mitigation
<p>Local residents living on the HSS affected streets may be negatively impacted by the restrictions due to a lack of vehicular access for deliveries, taxis etc.</p>	<p>Residents living within the proposed HSS restricted area would be able to apply for an exemption so that they could still access their homes by motor vehicle at all times. Penalty Charge Notices would not be issued to anybody driving out of the scheme area.</p> <p>Deliveries and visits from friends/ relatives would need to be scheduled outside of the operational hours of the scheme, however officers note that the restrictions only operate for limited hours a day, Monday to Friday, during term time with full vehicle access remaining outside these times.</p> <p>Exemptions would be available for Plus Bus Door to Door and Dial A Ride services and could be granted for Blue Badge holders that need to access the school or an address within the proposed restricted area during restricted times. Exemptions for emergencies, carers, taxis or other exceptional circumstances could also be agreed with the Council.</p>
<p>Residents/properties located in the HSS zone on Kidderpore Avenue as consulted on, and no longer included in the revised HSS zone, would no longer be able to go through the HSS restricted streets: Kidderpore Gardens, Ferncroft Avenue, Hollycroft Avenue and the HSS restricted section of Kidderpore Avenue. Access to Kidderpore Avenue (south of Penrose Gardens) would only be available from Heath Drive. In addition, residents may feel disadvantaged as the benefits of traffic reduction due to the HSS would not be as great for this section of the street, compared to the original proposals as consulted on.</p>	<p>Residents on the unrestricted section of Kidderpore Avenue would still benefit considerably from lower traffic volumes as the HSS would restrict the through-traffic from Platt's Lane and potentially from Heath Drive. The amended proposals better respond on balance to issues and concerns raised during the public consultation. If approved, the scheme would be implemented as a trial and further monitoring of the traffic levels/speed and residents feedback would be undertaken.</p>
<p>Some respondents were concerned about the turning movements on Hollycroft Avenue at the junction with Ferncroft as a result of a displaced drop-off point.</p>	<p>Officers have carefully reviewed the scheme proposals and propose to include Hollycroft Avenue (between Ferncroft Avenue and Rosecroft Avenue) within the HSS, as outlined in section 2 of the Decision report and illustrated in Appendix C (Post- consultation</p>

Issue	Mitigation
	<p>scheme drawings). This would help mitigate the displacement of school drop off/pick up, and U-turning movements at the junction with Ferncroft Avenue. The amended proposals would mean that the drop off would take place further away from this junction. If the scheme is approved, further monitoring would take place to understand any traffic displacement in the wider area.</p>
<p>Some respondents have outlined concerns of vehicles speeding in the area and suggested speed calming measures.</p>	<p>The traffic data collected for this scheme does not highlight a significant speeding problem: on Kidderpore Avenue, the 5 day daily average speed (combined eastbound and westbound) is 19.1mph; similarly, on Ferncroft Avenue, the 5 day daily average speed (combined eastbound and westbound) is 21.1mph. Officers would monitor the traffic speeds during the trial, if approved, and would consider speed calming measure in response to the monitoring data, if required. Officers will also investigate opportunities to improve existing 20 mph signage in the area.</p>
<p>Some respondents have outlined concerns of young girls' safety as they felt the HSS would make them walk in the dark and expose to dangers.</p>	<p>The HSS scheme aims to create a safer environment outside schools during drop off and pick up times to enable more children to walk, cycle or scoot to school, with less air pollution, road danger and congestion. The proposed scheme, with proposals for HSS, pavement buildouts, street greening and cycle stands, aim to improve the pedestrian environment in the area to support school children, particularly young children, to walk/cycle/scoot to and from school and to encourage more journeys to be made by sustainable modes of transport instead of being driven, with benefits to the wider community from less traffic.</p> <p>The proposals were shared with the Council's Community Safety Team prior to public consultation, and they did not raise any concerns. In addition, we have not had any reports regarding safety for girls at any of the 32 HSS schemes covering 36 schools in the borough. If approved, we would continue to monitor the scheme including with the Community Safety Team.</p> <p>In addition, drop-off or pick up could still take</p>

Issue	Mitigation
	place from Heath Drive, just a few minutes' walk away from St Margaret's school, or Platt's Lane or south of the restriction with Penrose Gardens for St Luke's CE school, also a few minutes' walk.
Some businesses on the restricted streets have expressed concerns for vehicle access for deliveries, maintenance contractors etc.	The HSS aims to reduce traffic volumes and dominance and create a safer environment outside schools during drop off and pick up times, and to enable more children to walk, cycle or scoot to school, with less road danger, congestion, and more space for people to stop and chat. Officers note that the HSS restrictions would operate only for a limited time of the day during school pick up and drop off times, Monday- Friday, during school term times. Any vehicles already present on the restricted streets before HSS hours can leave at any time during the restricted times. Hence it is advised that vehicles used for maintenance and deliveries should arrive outside of these times.
St Luke's CE School highlighted that the long HSS restriction times may result in losing school staff who have special conditions or depend on cars to access the school.	<p>The consulted scheme proposed the HSS times to capture the different pick up and drop off times of both St Luke's CE School and St Margaret's school in a combined HSS scheme. In response to the consultation comments, officers have reviewed the scheme proposals and recommend separating the HSS zones for each school, as outlined in section 2 of the Decision report. This enables the HSS restriction times to be amended (reduced) to better meet the needs of each school separately. For St Luke's CE School, the recommended HSS times are 8:15am to 9:15am and 3:15pm to 4pm.</p> <p>Officers note that the HSS restrictions also apply to the school staff and there are no exemptions for the school staff available. However, staff with medical conditions that make them dependent on vehicular access to school would be eligible for exemptions. Also, blue badge holders and parents/carers with a responsibility for a disabled pupil who is unable to walk, cycle or scoot to school, would be eligible for exemptions. The exemptions can be discussed with officers on case-by-case basis. The eligibility for exemptions is outlined in the</p>

Issue	Mitigation
	HSS exemption policy and is in line with all of the Council's HSS schemes and follows best practice guidance from Transport for London.

Road Safety Audits

- 4.5. Stage 1 and 2 Road Safety Audits (RSA) have been completed as part of the design process and necessary safety changes have been incorporated into the final design of this scheme. A Stage 3 RSA would be undertaken following implementation of the trial, if approved.

5. CONSULTATION / ENGAGEMENT

- 5.1. Between 26 February and 18 March 2024, a [public consultation](#) was undertaken for the proposed trial HSS scheme and the permanent Safe and Healthy Streets measures on the streets around St Margaret's School and St Luke's CE School in Frognal. A total of 2167 flyers containing a link and QR code to the online consultations were hand-delivered to all properties, including residents, businesses and organisation in the consultation area (Figure 1 in **Appendix A**). 25 Street notices which provided information on the consultation were put up in the area. An email containing a link to the online consultation was sent to Local Groups and Statutory Consultees such as the police, emergency services, Borough-wide stakeholder groups, and Ward Councillors in the Camden Town ward. All groups consulted are set out in **Appendix A** (Consultation Report); the consultation materials can be found in **Appendix F**.
- 5.2. A total of 515 valid responses were received to the online public consultation on the [We Are Camden webpage](#) and 47 email responses were received through the Safe Travel inbox. Valid responses are defined as those with a valid UK postcode. No responses were received by post. Only one response per respondent was accepted. There were 12 duplicated responses received. The first response received from each duplicated pair was processed, and the other was removed. A detailed overview of the consultation comments with officers' response is provided in **Appendix A**. A quantitative summary of the consultation responses received on We Are Camden is given below.
- 5.3. In addition, a local stakeholder group raised a petition that received 1,673 signatures. The concerns presented in this petition are discussed in **Appendix A** and 5.11 below, along with the officers' response.
- 5.4. In addition, officers received 2 Member's Enquiries and 5 formal complaints on the Council's Complaints dashboard which were also considered responses to the consultation. These responses are analysed qualitatively in **Appendix A** and do not count towards the quantitative summary of responses, which is provided in the sections below.

HSS proposals on Kidderpore Avenue, Kidderpore Gardens and Ferncroft Avenue

- 5.5. Consultees were asked for their level of agreement or disagreement (ranging from 'strongly agree' to 'strongly disagree') on various elements of the scheme. The respondents were also asked to give their views on why they agree/disagree/ unsure/ neutral to the questions and to outline their comments/concerns regarding this proposal. A summary of the concerns raised and officers' responses can be found in **Appendix A** (Consultation Report).
- 5.6. The proposal for a trial HSS timed motor vehicle restriction received a low level of support from both within and outside the consultation area, as illustrated in Table 3 below. Overall, out of a total 515 respondents, 406 (78.8%) disagree or strongly disagree (36 and 370 respectively) with the proposals compared to 97 (18.8%) who either strongly agree or agree (78 and 19 respectively); 12 respondents remain neutral/ unsure/not answered (2.4%).

Table 3 - Summary of respondents' level of support for HSS restrictions on Kidderpore Avenue, Kidderpore Gardens and Ferncroft Avenue

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Unsure	Not answered
Respondents within the UK outside London	50% (1)	0 % (0)	0	50% (1)	0% (0)	0	0
	50% (1)			50% (1)			
Within London and outside Camden	12.5% (9)	0 % (0)	0	8.3% (6)	77.8% (56)	1.4% (1)	0
	12.5% (9)			86.1% (62)			
Inside Camden but outside the consultation area	37.1% (26)	4.3% (3)	1.4% (1)	4.3% (3)	52.9% (37)	0	0
	41.4% (29)			57.2% (40)			
Inside the consultation area	11.3% (42)	4.3% (16)	1.3% (5)	7% (26)	74.7% (277)	1.1% (4)	0.3% (1)
	15.6% (58)			81.7% (303)			
Overall response	15.1% (78)	3.7% (19)	1.2% (6)	7% (36)	71.8% (370)	1% (5)	0.2% (1)
	18.8% (97)			78.8% (406)			

(Note: Does not total 100% in some cases due to rounding)

- 5.7. In addition to the questions seeking their level of support for the proposals discussed in the Section above, the consultation questionnaire also asked respondents for comments and feedback. Key issues raised by respondents to the on-line consultation as well as those received by email are discussed in detail in **Appendix A** (Consultation Report). During the analysis, all comments across all consultation responses were carefully considered. To assist with analysis, comments were categorised into three broad categories: positive comments, negative comments, and themes of general comments or suggestions/concerns. A summary of the main

concerns raised in the public consultation include:

- Motor vehicle access to Hampstead School of Art on Penrose Gardens for students carrying large or heavy items.
- Traffic displacement onto Hollycroft Avenue and other surrounding streets.
- Access for taxis, service vehicles and emergency services.
- Vehicles speeding in the area and suggestions for speed calming measures.
- Young girls' safety as some respondents felt the HSS would make them walk in the dark and expose to dangers.
- Some respondents felt that they were not consulted as they did not receive consultation flyers.

5.8. While the overall response to the consultation did not support the proposed measures, Officers have carefully considered the content of the responses. In response to the key concerns raised in the public consultation, which are detailed in **Appendix A**, Officers propose amending the scheme as set out in Section 2 and discussed in Table 1. This includes reducing the extent and times of the HSS restrictions on Kidderpore Avenue to facilitate access to Hampstead School of Art; it includes separating the HSS restriction into two zones and HSS restriction times to be considered separately for each school to better suit the individual school's drop off and pick up times, rather than as a combined scheme. Officers also propose including Hollycroft Avenue (from Ferncroft Avenue to Rosecroft Avenue) within the HSS restriction zone for St Margaret's school, responding to road safety concerns raised in consultation. A detailed analysis of all comments received together with officers' responses are included in **Appendix A** (Consultation Report). The amended proposals are illustrated in **Appendix C** (Post Consultation Drawings).

Proposal for pavement widening on Ferncroft Avenue

5.9. Overall, out of a total 515 respondents, 111 (21.6%) either strongly agree or agree (55 and 56 respectively) compared to 280 (54.3%) who disagree or strongly disagree (46 and 234 respectively), while 124 respondents remain neutral/ unsure/not answered (24.1%).

Table 4 - Summary of respondents' level of support for pavement widening on Ferncroft Avenue

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Unsure	Not answered
Respondents within the UK outside London	100% (2)	0% (0)	0% (0)	0% (0)	0% (0)	0% (0)	0% (0)
	100% (2)			0% (0)			
Within London and outside Camden	8.3% (6)	9.7% (7)	25% (18)	8.3% (6)	48.6% (35)	0% (0)	0% (0)
	18% (13)			56.9% (41)			
Inside Camden but outside the	32.9 (23)	7.1% (5)	25.7% (18)	7.1% (5)	27.1% (19)	0% (0)	0% (0)

consultation area	40% (28)			34.2% (24)			
Inside the consultation area	6.5% (24)	11.9% (44)	23.7% (88)	9.4% (35)	48.5% (180)	0% (0)	0% (0)
	18.4% (68)			57.9% (215)			
Overall response	10.7% (55)	10.9% (56)	24.1% (124)	8.9% (46)	45.4% (234)	0% (0)	0% (0)
	21.6% (111)			54.3% (280)			

(Note: Does not total 100% in some cases due to rounding)

Proposals for cycle stands and tree planting on Kidderpore Avenue outside St Luke's CE School

5.10. Responses to this proposal are relatively evenly balanced. Overall, of a total 515 respondents, 177 (34.4%) either strongly agree or agree (50 and 127 respectively) compared to 167 (32.4%) who disagree or strongly disagree (28 and 139 respectively), while 171 (33.2%) respondents remain neutral/ unsure/not answered.

Table 5 - Summary of respondents' level of support for Cycle stands and tree planting on Kidderpore Avenue outside St Luke's CE School.

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Unsure	Not Answered
Respondents within the UK outside London	50% (1)	0% (0)	50% (1)	0% (0)	0% (0)	0% (0)	0% (0)
	50% (1)			0% (0)			
Within London and outside Camden	11.1% (8)	30.6% (22)	34.7% (25)	6.9% (5)	13.9% (10)	1.4% (1)	1.4% (1)
	41.7% (30)			20.8% (15)			
Inside Camden but outside the consultation area	17.1% (12)	40% (28)	25.7% (18)	2.9% (2)	11.4% (8)	2.9% (2)	0% (0)
	57.1% (30)			14.3% (10)			
Inside the consultation area	7.8% (29)	20.8% (77)	30.2% (112)	5.7% (21)	32.6% (121)	2.7% (10)	0.3% (1)
	28.6% (106)			38.3% (142)			
Overall response	9.7% (50)	24.7% (127)	30.3% (156)	5.4% (28)	27% (139)	2.5% (13)	0.4% (2)
	34.4% (177)			32.4% (167)			

(Note: Does not total 100% in some cases due to rounding)

5.11. A petition initiated by RedFrog Residents' Association, and signed by 1,674 residents,

highlights concerns around traffic displacement, motor vehicle access for residents/elderly/ disabled to the restricted streets for deliveries and emergency care, and impacts on the conservation area. Officers have carefully reviewed the scheme proposals and have proposed revisions in the scheme to address these concerns, as outlined in Section 2 of this report. A detailed officers' response to these can be found in section 5 of **Appendix A** (consultation report).

- 5.12. Full details of the public consultation and Officers' responses to feedback received as part of the consultation, are included in **Appendix A**.

6. LEGAL IMPLICATIONS

- 6.1. The recommendations in this report are being considered in the Council's capacity as the Local Highway/Traffic Authority for the Borough.

Highways Act Powers

- 6.2. Part V (Improvement of Highways) of the Highways Act 1980 contains a general power of improvement, which – subject to certain limitations – permits a highway authority to carry out improvement works not covered by specific improvement works within Part V.

Road Traffic Powers

- 6.3. Parts I and II of the Road Traffic Regulation Act 1984 ("RTRA") empower the Council to regulate or restrict traffic on roads, and Part IV to designate or provide parking places, including providing stands or racks for devices for securing bicycles, within the Borough by Traffic Regulation Order for a range of purposes. Under section 6(1) of the RTRA 1984 (orders similar to traffic regulation orders), as a traffic authority within Greater London the Council may make an order for controlling or regulating vehicular and other traffic (including pedestrians) on roads within the Borough for which it has responsibility. Such an order may be for any of the purposes or with respect to any of the matters mentioned in Schedule 1 to the RTRA and for any of the purposes mentioned in paragraphs to (g) of section 1(1) (traffic regulation orders outside Greater London) of that Act. Such an order may be made only where it appears to the authority that is expedient to make the order for the purpose(s) in question.
- 6.4. Under section 9(1)(b) of the RTRA 1984 (experimental traffic orders) as a traffic authority within Greater London the Council may make an experimental traffic order making any such provision as may be made by an order under section 6. An experimental traffic order must be genuinely experimental: it must be an operation designed to glean information about the workings of the scheme in practice.
- 6.5. Section 122(1) of the RTRA confers a duty on the Council to exercise its functions under that Act (so far as practicable having regard to the matters specified in section 122(2)) 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. Based on case law applicable to another RTRA power, it is considered that "safe" in section 122 (1) means "not at risk of accident", rather than "free from ill health. The matters specified by section 122(2) are:
- (a) *the desirability of securing and maintaining reasonable access to premises;*
 - (b) *the effect on the amenities of any locality affected and (without prejudice to the*

- generality of this paragraph) 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;*
- (c) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);*
 - (d) 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*
 - (e) any other matters appearing to ... the local authority ... to be relevant.*

Road Traffic Act 1988

- 6.6. Section 39 of the RTA 1988 requires the Council to prepare and carry out a programme of measures designed to promote road safety, to carry out studies into accidents arising out of the use of vehicles on roads in its area, and – in the light of those studies - to take such measures as appear to the Council to be appropriate to prevent such accidents, including giving advice and practical training to road users, the construction, improvement, maintenance, or repair of roads for which they are responsible, and other measures taken in the exercise of its powers for controlling, protecting, or assisting the movement of traffic on roads.

The network management duty

- 6.7. Under section 16 of the Traffic Management Act 2004 (the network management duty), the duty of a traffic authority is 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. Under section 17(5) of the Traffic Management Act 2004 the network management duty includes obligations on traffic authorities to monitor the effectiveness of the implementation of their decisions and assess their performance in managing their network.
- 6.8. The Council, as highway authority, must have regard to statutory guidance issued by the Secretary of State under section 18 of the Traffic Management Act 2004 when delivering their network management duty under the RTA 1984.
- 6.9. The Network Management Duty Guidance was published in November 2004. In terms of public consultation (at paragraph 64) it states that the local traffic authority should seek the views of residents, local businesses and the different road users both when deciding which policies on network management to adopt and when monitoring whether these policies are delivering the required outcomes. Such consultation should preferably be part of the authority's overall public consultation programme.
- 6.10. In March 2024, the Secretary of State published draft guidance *Implementing low traffic neighbourhoods*. This guidance remains in draft and is not statutory guidance to which the Council must have regard. However, it is noted that the draft guidance emphasises the importance of adequate engagement and communication with residents and affected groups and that decisions about low traffic neighbourhoods should be taken with reference to wider local policy objectives such as those set out in a local transport plan.

The Mayor of London's Transport Strategy

- 6.11. The Mayor's Transport Strategy 2018 was issued under Part V of the Greater London Authority Act 1999 (Transport), specifically section 144(1) which empowers the Mayor to

issue guidance to London borough councils, among other bodies and persons. Under section 144(1) London borough councils are to have regard to the guidance in exercising any function.

Public Consultation

6.12. In *R (on the application of Moseley) v London Borough of Haringey* [2014] UKSC 56, the Supreme Court approved a list of four legal requirements relating to public consultation, which had previously been approved by the Court of Appeal in *R v Brent London Borough Council ex parte Gunning* (1985) 84 LGR 168—and therefore often referred to as the ‘Gunning’ or ‘Sedley’ requirements. These are that:

- 1) consultation must be at a time when the authority’s proposals are still at a formative stage;
- 2) the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response;
- 3) adequate time must be given for consideration and response; and
- 4) the product of consultation must be conscientiously taken into account in finalising any proposals.

6.13. In terms of the fourth point, the decision maker must consider consultation responses with ‘a receptive mind’ and be prepared to change course if persuaded. But there is no duty to adopt the views of consultees. This last point is sometimes expressed by saying that a consultation is not a referendum.

Equality

6.14. The Council must, when carrying out the Council’s functions (which includes making decisions), have due regard to section 149 of the Equality Act 2010 (the Public Sector Equality Duty - PSED). This duty includes having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic (including people with a disability) and persons who do not share it. The Council must comply with the duty, which requires rigorous consideration and an open mind, and is personal to decision makers. In order to assist the Council to comply with section 149, an Equality Impact Assessment (EQIA) is attached as Appendix C to this report. The relevant decision-maker must carefully consider the EQIA as applicable to the scheme they are asked to approve.

6.15. In summary, the PSED requires the Council, when exercising its functions, to have ‘due regard’ to the need to:

- 1) Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act (which includes conduct prohibited under section 29);
- 2) Advance equality of opportunity between people who share a relevant protected characteristic and those who don’t share it;
- 3) Foster good relations between people who share a relevant protected characteristic and those who do not (which involves having due regard, in particular, to the need to tackle prejudice and promote understanding).

6.16. The relevant protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion, sex, and sexual orientation. In respect of the first aim only (i.e., reducing discrimination, etc) the protected characteristic of marriage and

civil partnership is also relevant. In discharging the Duty the Council has also given a public commitment to give due weight to evidence in relation to the Key Local Characteristics relating to the groups of people referred to page 9 of the attached Equalities Impact Assessment (EIA) (given the strong probability that many people within those groups will have protected characteristics). The relevant groups are Foster carers, Looked after children/care leavers, Low-income households, Refugees and asylum seekers, Parents (of any gender, with children aged under 18), People who are homeless, Private rental tenants in deprived areas, Single parent households and social housing tenants.

- 6.17. In addition, with reference to disability, the Council has a duty under section 29 of the Equality Act 2010 (set out in the EQIA) not to do anything that constitutes discrimination (or victimisation or harassment) in the exercise of a public function, and a duty to make reasonable adjustments. The EQIA is also important material in this regard.
- 6.18. The Council should also bear in mind relevant parts of the United Nations Convention on the Rights of Persons with Disabilities and the United Nations Convention on the Rights of the Child. Some of those parts relate to (as regards persons with disabilities) the physical environment, transportation, personal mobility and sporting and leisure activities (UNCRPD), and (as regards children) self-reliance and active participation in the community of disabled children, standards of health, dangers and risks of environmental pollution, and recreational and leisure activities (UNCRC).
- 6.19. Further, section 149 provides that the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities. Compliance with the PSED may involve treating some persons more favourably than others, but that is not to be taken as permitting conduct that would otherwise be prohibited under the Act (which includes breach of an equality clause or rule, or of a non-discrimination rule).
- 6.20. The PSED is not a duty to achieve the objectives or take the steps set out in section 149. Rather, the PSED requires the authority to take the specified needs into proper consideration when carrying out its public functions. There must be a proper appreciation of the potential impact of the decision on the equality objectives set out in section 149 and of the desirability of promoting them. "Due regard" means the regard that is appropriate in all the particular circumstances in which the authority is carrying out its functions. It is for the Council to decide, taking into account all relevant factors how much weight to give to the equality implications of the decision.
- 6.21. In exercising its road traffic and highway powers, the Council is exercising a "public function": Under section 29 of the Equality Act 2010, it must not, when exercising a public function, "do anything that constitutes discrimination, harassment or victimisation" (section 29(6)) and it must make reasonable adjustments (section 29(7)). The duty to make reasonable adjustments arises in relation to disabled persons and under section 20 of, and Schedule 2 to, the Equality Act 2010.

7. RESOURCE IMPLICATIONS

- 7.1. This report seeks approval from the Cabinet Member for Planning and a Sustainable Camden to implement the trial St Margaret's School and St Luke's Church of England

School Healthy School Street Scheme and permanent Safe and Healthy Streets measures, as set out in Section 2 of the report. We propose to implement the scheme in phases and to proceed with the trial HSS elements as the first phase, if approved. Expenditure is expected in 2025/26.

- 7.2. The estimated cost of implementing a trial HSS is £190,000 including contingency. This would be funded from TfL LIP funding and Camden Council Capital, as follows:

Funding Source	Amount
TfL LIP Funding 2025-2026	£45,000
Council Capital (rollover from 2024-2025)	£48,000
Council Capital (2025-2026)	£100,000

8. ENVIRONMENTAL IMPLICATIONS

- 8.1. The trial HSS and permanent Safe and Healthy Streets proposals outlined in section 2 of this Decision Report could have a positive impact on the environment, by encouraging reduced motor vehicle traffic movements and supporting sustainable modes of transport, such as walking, cycling, and scooting. This could help to improve air quality and reduce greenhouse gas emissions. The proposals strongly align with the objectives of our Clean Air Action Plan 2023- 2026 and Climate Action Plan as set out in section 1 of this report. The proposals address one of the objectives of the Clean Air Action Plan which states, “we will work towards a modal shift away from private vehicles towards walking, cycling and public transport”.
- 8.2. Providing new trees (subject to detailed design) would deliver important benefits in terms of rainwater retention and increasing urban biodiversity and improving air quality. Plants and trees can also offer a significant cooling effect due to reduced area of hard surfaces, and increased canopy and shade, which means that increasing urban planting is an important mitigation to the effects of climate change.
- 8.3. The proposals could also result in positive benefits to the environment due to the potential for reduced carbon dioxide emissions. The Council’s Climate Action Plan “encourages a shift away from combustion engine vehicles and heating systems, both of which are significant contributors to air pollution in the Borough. The Climate Action Plan also seeks to encourage healthier travel options such as walking and cycling, which also bring public health benefits” and includes a specific action to deliver Healthy School Streets to deliver the Plan.

9. TIMETABLE FOR IMPLEMENTATION

- 9.1. Subject to approval by the Cabinet Member for Planning and a Sustainable Camden, implementation of the scheme and construction would follow the below outline timeline.

Table 3: Project Programme

Date	Stage
May 2025	Decision report considered for approval.

Autumn 2025	Experimental Traffic Order advertised for the HSS scheme. Trial HSS scheme installed subject to the delivery programme.
Late 2025	TMO consultation on the proposals for permanent measures and consideration of any objections to that TMO.
School Winter term 2025	Trial HSS scheme goes live.
May 2026	Implementation of permanent measures subject to TMO consultation
Spring 2027	Decision made whether to make trial HSS scheme permanent, subject to monitoring data and feedback collected during trial period.

10. APPENDICES

Appendix A: Consultation Report
 Appendix B: Consultation Drawings
 Appendix C: Post-consultation Drawings
 Appendix D: Equality Impact Assessment
 Appendix E: Policy and Strategic Alignments
 Appendix F: Consultation Materials

REPORT ENDS