Appendix C - Objection themes and officer responses

All comments and suggestions received (Appendix B) have been considered by officers. This table summarises the main themes of objection and the response to those objections.

Grounds of	Officer response
representation /	
objection	
Object. Displaces traffic congestion, adds to pollution on other roads. Who benefits? (Count = 27)	In 2018, a landmark study of the impact of London's air pollution found children growing up in the capital and exposed to air pollution showed significantly smaller lung volume, with a loss of approximately five per cent in lung capacity. Research shows that those exposed to the worst air pollution are more likely to be deprived Londoners and from black, Asian and minority ethnic communities.
	According to Public Health England, London has higher rates of hospital admissions for asthma in under 19-year-olds compared to other regions in England.
	We also know that motor vehicles are the single biggest cause of London's air pollution.
	By restricting motor vehicles outside the school gate, the scheme most benefits vulnerable children who are particularly at risk from air pollution.
	Evaluation reports from earlier schemes in the borough and London-wide, indicate that motorised traffic not only decreases on the school street where the scheme has been implemented, but also on surrounding streets. They have also been shown to have an effect on traffic reduction outside of the operating period of the school street. This suggests a change in behaviour with people swapping mode of transport to active travel or public transport. In turn this reduces, not displaces congestion. School Streets are not the only tool to address poor air quality but is one
	of a range of measures that Haringey is implementing.
Object. Penalises many residents, restricts deliveries / services and access problems for elderly, disabled and others needing services/carers/family visits (Count = 22)	The Council operates a free exemption system that allows certain groups of motorists to drive into a School Street during restricted hours. School Streets are limited to approximately 1hrs in the AM and PM, Monday to Friday, so in practice are only operational for a small proportion of the day. Furthermore, School Streets only operate during term time.
	Any vehicle may drive out of a School Street during restricted hours, without the need for an exemption. Exemptions are available for residents and so are not unduly impacted.
	Those people with a disability living in (or require access to) the School Street are exempted in the same way as other residents. Organised disability transport e.g. needs for SEND and DALO transport is also exempted from the restriction.
	It is acknowledged that visitors and deliveries are not exempt during the restricted hours.

The lack of exemptions for visitors and deliveries is crucial in achieving the objective of reducing congestion and reducing road danger outside the school gate.

We recommend that visitors either walk or cycle their journey, park their car in a nearby street and walk the short distance to the school, or arrive outside of the hours of the School Street.

Home deliveries should avoid driving into the School Street during operational times. Our School Streets are generally small and therefore, during operational times, delivery companies need to adapt: reduce, retime, reroute or remode.

School Streets are designed to be compact, often affecting one or a small number of streets for limited distances. This means that delivery drivers that do arrive during the hours of operation should be able to park nearby and walk to their final destination. This also ensure we have a simple and practicable exemption system.

It is noted that the number of parcels delivered in London is expected to double by 2030 and areas immediately outside the school gate should be protected from this.

Design

The design approach of Haringey's School Streets is consistent with other London boroughs. By late-2022 there were over 500 School Streets in the capital.

Each school is carefully assessed to respond to the local situation, but a consistent design approach is applied which means that School Streets:

- limit access to pedestrians and cyclists only in the street(s) outside the school gates i.e. no motor vehicles
- only operate for a limited time each day which aligns with the times that the school gates open and close
- operate in a logical section of street or streets (known as a zone) that removes or reduces the need for vehicle U-turns at the closure point, i.e. School Streets should generally start at a junction where vehicles can safely choose another route, if they find the street closed

The size of our School Streets (i.e. the number of roads included) is guided by the location of the school gates in relation to the surrounding road network. In some cases, a short length of road will work effectively (e.g. a cul-de-sac or one-way street) but, in other locations, a more extensive network of streets will be required to have a similar effect.

Larger zones may (in some circumstances) make driving to school even less appealing (and can minimize concern about potential displacement)

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	but a larger zone will also result in more exemption permits being issued. More exemption permits per zone will increase the frequency that school children and cars are on the road at the same time and therefore larger zones will reduce the road safety benefits that might be achieved through a smaller zone.
Object. Principle may be OK but I do object to lack of consideration for impact on residents (Count = 7)	Residents are accommodated through the online exemption system. We acknowledge that having to apply annually for an exemption does add a new level of bureaucracy to resident's busy lives. However, it is important to consider that a robust system – with appropriate enforcement – is necessary for the scheme to be effective. A system of self-regulation would not be effective, ie if we were permitted to put up signs that said 'no school run traffic, residents only' those signs would not be effective and potentially increase road danger to children.
Object. Physical traffic filters (e.g. Rusper Rd and Clacton Rd) should be reopened (Count = 4)	Physical traffic filters have been introduced as a component of the LTN. These will be reviewed at a future point when the final LTN reviews are carried out in 2024.
Object. Money making scheme (Count = 3)	The main objective of the scheme is to bring health benefits to school age children, by encouraging increased levels of walking, cycling and wheeling to school and a reduction in road danger and pollution near the school gate. The moving traffic restriction that is associated with the School Street has been decriminalised (ie not enforced by the police) and therefore enforcement rests with the Council, as traffic authority. Penalty Charge Notice levels are not set by Haringey Council but are set at a London-wide level by London Council TEC. Our vision is for 100% compliance of the restriction as this would bring the greatest benefits to children. Income derived from PCNs associated with School Streets is used to offset the running costs of the scheme and in accordance with national
Object. No associated infrastructure included e.g. cycling	legislation. The LTN scheme approved did include some new infrastructure. These were 18 secure Bikehangars for cycle storage and new zebra crossings across all 3 phase one LTN areas.
(Count = 1)	New cycle lanes were not included from the outset as the demand for cycling generated from the schemes was unknown. The Council are

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currently developing plans for new cycle lanes this financial year within
the Walking and Cycling Action Plan.