

<b>REPORT TO:</b>	<b>TRAFFIC MANAGEMENT ADVISORY COMMITTEE 2 May 2019</b>
<b>SUBJECT:</b>	<b>SCHOOL STREETS</b>
<b>LEAD OFFICER:</b>	<b>Shifa Mustafa, Executive Director, Place</b>
<b>CABINET MEMBER:</b>	<b>Councillor Paul Scott, Acting Cabinet Member for Environment, Transport &amp; Regeneration (Job Share)</b>
<b>WARDS:</b>	<b>Norbury and Pollard Hill, Crystal Palace &amp; Upper Norwood, West Thornton, Bensham Manor, Purley Oaks &amp; Riddlesdown, Kenley, New Addington South</b>
<b>CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON:</b>	
<p>School Streets are intended to contribute to securing a healthy and safe environment near to schools, and to help children and parents use cars less and to walk, cycle and use public transport more.</p> <p>The School Streets support objectives in the:</p> <ul style="list-style-type: none"> <li>• Corporate Plan 2018 – 2022.</li> <li>• Third Local Implementation Plan (LIP3).</li> <li>• Air Quality Strategy and Air Quality Actions Plan.</li> <li>• Croydon’s Public Health Strategy.</li> <li>• Croydon’s Community Strategy 2016 – 2021.</li> <li>• Parking Policy (draft for consultation, agreed by Cabinet on 25 March 2019)</li> </ul>	
<b>FINANCIAL IMPACT:</b>	
<p>The cost of conducting the formal consultation can be met within the established operations budget. The financial implication of introducing School Streets depends on the outcome of the recommended formal consultation. Any subsequent decision to implement School Streets will be paid back within 2 years.</p>	
<b>RECOMMENDATIONS:</b>	
<p>1.1 Note the engagement with 93 junior and primary schools; the receipt of 31 School Street requests; the identification of 11 favourable locations; and the selection method for proposing School Streets in an initial 8 locations. Note that 2 further schools have requested a scheme, subsequent to the initial assessments and selections were made.</p> <p>1.2 Note the summary of responses received to the informal engagement with residents, businesses and other occupiers within the areas potentially affected by the 8 School Street proposals.</p> <p>1.3 Note the Executive Director of Place has agreed to proceed with formal consultations on proposals to introduce 8 separate School Street schemes in the following locations:</p>	

- Norbury Manor Primary (Norbury Park ward)
- Fairchildes Primary School (New Addington South ward)
- Harris Academy Purley (Purley Oaks & Riddlesdown ward)
- Winterbourne Junior Girls and Boys School (Bensham Manor ward)
- Cypress Primary School (Crystal Palace & Upper Norwood ward)
- Downsview Primary & Nursery (Norbury Park ward)
- Harris Primary Academy Kenley (Kenley ward)
- West Thornton Primary Academy, Rosecourt Road site (West Thornton)

The Highway Improvement Manager, Public Realm Directorate has been delegated the authority to give the Public Notice for formal consultation.

- 1.4 Note the results of formal consultations is a Key Decision and as such will be referred to the Traffic Management Advisory Committee for advising the Cabinet Member for Transport and Environment (job share) on whether or not to implement the Proposals.

## **2 EXECUTIVE SUMMARY**

- 2.1 On 18 April 2019 and pursuant to the delegation from the Leader dated 6 June 2016, the Executive Director Place, following consultation with the Cabinet Member for Environment, Transport and Regeneration (job share) determined that it was appropriate to refer the matters detailed in 1.3 above to the Traffic Management Advisory Committee.
- 2.2 Roads with a school entrance are spaces where children and moving motor vehicles co-exist. Many such roads are experiencing illegal parking and often hostile traffic conditions at the start and end of the school day. The situation has health and safety implications for both children and adults. The situation is worsening, due to the continual growth in the number of cars on the road and a decade high peak in the number of children coming into school age. Regional and Local transport policies translate into a need for actions to help reverse the trend of an increasing number of children being driven to school, given the congestion and public health implications.
- 2.3 Conventional parking enforcement patrols have been intensified near schools entrances in recent years. However, they are resource demanding and prove to have a limited short term effect. Regular occasions of open hostility towards staff and other road users set a bad example to the children. The Deregulation Act 2015 removed the powers to use camera enforcement around schools, with exception of the school zigzag. The conventional measures alone are proving insufficient in resolving illegal parking near school entrances and it cannot address the road safety and air pollution effects from traffic congestion.
- 2.4 A School Street, in present context, is a street with a school entrance which during the start and end of the school day is restricted to use by pedestrians and cyclists, with most motor vehicle traffic prohibited. The School Street is

intended to contribute to securing a healthy and safe environment near to a school, and to help children and parents use cars less and to walk, cycle and use public transport more (see paragraph 3.1.3 for more details).

- 2.5 An initial engagement with regards to introducing 8 new School Street schemes has produced a result as follows:
- 1,985 consultation letters issued.
  - 346 responses received.
  - 25% are opposed to the proposal.
  - 69% are in favour of the proposal.
  - 4% are in favour, but on condition the zones extend further than proposed.
  - 2% undecided.
- 2.6 The results of the formal consultation on the proposed Traffic Management Orders to implement a School Street in the 8 locations will be reported to this Committee.
- 2.7 Subject to the outcome of the formal consultation, it is anticipated that minimum 3 School Streets could be implemented before start of the new school year in September 2019, with the remainder being implemented by 31 March 2020.
- 2.8 The financials of implementing a School Street depends on the number of entry points to the road(s) being covered in the scheme. The average School Street cost approximately £47k to install and £47k p.a. to operate.

### **3 DETAILS**

#### **3.1 POLICY OBJECTIVES FOR SCHOOL STREETS**

- 3.1.1 The Corporate Plan responds to National, Regional and Local policies and priorities. Amongst other objectives, the Plan sets out to support the development of a culture of healthy living, deliver the Air Quality Action Plan and tackling idling vehicles, in particular around schools<sup>1</sup>.
- 3.1.2 The Air Quality Action Plan is a five year plan to improve air quality within Croydon.
- 3.1.3 The Third Local Implementation Plan (LIP3) reflects local plans and The London Mayor's over-reaching strategy, including that all local Councils must help children and parents to use cars less and to walk, cycle and use public transport more. This requires amongst other things that a healthier and safer environment is established at the school entrance. The strategy requires that London Local Authorities reduce the volume of traffic by 5% by 2021<sup>2</sup>.
- 3.1.4 The Public Health Report 2017 (the latest) identifies that Croydon currently has the highest rate of hospital admissions for childhood (0-9 years) asthma and

the third highest number of asthma deaths in London. 7.5% of premature deaths in Croydon are linked to air pollution<sup>3</sup>.

The level of Croydon residents who regularly travel by active modes (walking and cycling) is lower than in each of our neighbouring 6 boroughs. Only 26% of Croydon residents undertake the minimum 20 minutes of active travel each day needed to stay healthy. One in three of our children are now overweight and two in three adults are overweight<sup>4</sup>.

Croydon's Community Strategy has as priority to secure a good start in life, improve health outcomes and healthy life expectancy, and to secure a safer, cleaner and greener borough<sup>5</sup>.

The school run presents a particularly harmful combination of air pollution and inactivity for children and parents. Air pollution is typically worse inside a car in congested traffic, compared to walking on the pavement.

1. <https://democracy.croydon.gov.uk/mgConvert2PDF.aspx?ID=9963>
2. <https://www.croydon.gov.uk/transportandstreets/policies/draft-third-local-implementation-plan---consultation>
3. <https://www.croydon.gov.uk/democracy/dande/policies/health/annual-public-health-report>
4. <https://www.croydon.gov.uk/sites/default/files/articles/downloads/Healthy%20Weight%20Action%20Plan%202017-2020.pdf>
5. [https://www.croydon.gov.uk/sites/default/files/articles/downloads/Community Strategy 2016 21.pdf](https://www.croydon.gov.uk/sites/default/files/articles/downloads/Community%20Strategy%202016%2021.pdf)

- 3.1.5 The draft Parking Policy and Action Plan agreed by Cabinet on 25 March 2019, subject to consultation, sets out to introduce School Streets, using ANPR technology.

## **3.2 EVIDENCE FOR SCHOOL STREETS**

- 3.2.1 The School Street is a relatively young concept. In present context, it is a street with a school entrance which during the start and end of the school day is restricted to use by pedestrians and cyclists, with most motor vehicle traffic prohibited. The method for operating a Schools Street is described in Appendix 2.

- 3.2.2 The UK's continued growth in car ownership (+9% in the last 5 years, significantly faster than the +2.5% over the 5 years prior<sup>6</sup>) and a decade high peak in the number of children coming into school age (+22% compared to 10 years earlier<sup>7</sup>) are adding to the pressure in school roads. These causal factors follow economic and population cycles, which in Croydon are forecast to grow significantly above the UK average over the next decade. The naturally occurring cycles can therefore not be relied on to automatically resolve the traffic and parking situations at many junior and primary schools. The presently

worsening situations cannot be resolved without introducing some form of discouragement to driving.

3.2.3 School street traffic at the start and end of the school day does of course not relate solely to the school run. In some school roads there is also an element of commuter traffic using the road as a so-called rat run. The amount of such commuter traffic is additionally influenced by the increased car use.

3.2.4 The increase in car use influences parents' perception of child safety, further emphasising to them the necessity to drive their child to school. This self-perpetuation element in the current situation demands a strong measure, to help reverse the unsustainable trend of an increasing number of children being driven to school for relatively short journeys.

3.2.5 Several school roads have reached saturation point at the start and end of school days – meaning that in the most severe places there is practically no road space left for the problem to change much for the worse. What is changing, however, is the awareness of and attitude towards air pollution. Public opinion no longer tolerates the existing levels of traffic and air pollution.

In Croydon's online public engagement survey in September 2018<sup>2</sup>, 86% of 994 respondents agreed that traffic levels are too high in Croydon and 72% agreed it should be lowered. 74% agreed they are concerned about air quality. 62% agreed they would use the car less if alternatives were better. 57% agreed they would walk more and 39% would cycle more if conditions were right.

6. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/716075/vehicle-licensing-statistics-2017-revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716075/vehicle-licensing-statistics-2017-revised.pdf)
7. <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/birthsummarytablesenglandandwales/2017>

3.2.6 Croydon introduced 3 School Street pilot schemes under experimental traffic orders in 2017. The outcome was reported to this Committee on 4 July 2018. The then use of an experimental procedure, to appropriately enable amendments or reversal of the pilot schemes following learning, attracted criticism from some of those who participated in the post-installation consultation on the permanent traffic management orders. Nonetheless, the schools and residents within the 3 pilot zones responded favourable towards the schemes in the subsequent consultation.

3.2.7 The 3 School Street pilots are not isolated devices. Parallel information and training activities were undertaken by the school road safety team, under the STARS accreditation scheme. STARS is a TfL initiative for inspiring young Londoners to travel to school **sustainably, actively, responsibly and safely** by championing walking, scooting and cycling<sup>8</sup>.

Before and after surveys, precisely 1 year apart, have indicated the pilot schemes have significantly reduced car use. They identified a 15% (worst case) to 62% (best case) uptake in cycling, scootering and walking, and a 15% to 25% reduction in car use. The variances in the outcomes at the pilot schools are somewhat proportional to the car ownership and topology in the landscape near the schools – e.g. the biggest measured reduction in car use occurred at a school in the south of the borough where the latest 2011 census evidence that car ownership is more prevalent. The conversion is expected to be less where a school has a large catchment area, under-developed public transport, hilly surroundings or links to dangerous roads – where many parents currently do not feel any choice but to use the car.

It generally requires a relatively small change in the number of cars travelling in a road to make the difference between free-flowing traffic and obstructive congestion. When compensating for a low statistical confidence in the small number of samples in the existing data, it remains reasonable to conclude that the reduction in car use from the 3 existing School Street schemes and their combination STARS initiatives, has been significant, with more parents and children helped to use more active modes of travel.

- 3.2.8 Residents in roads neighbouring the 3 pilot schemes roads have raised concerns about feelings they had inherited the whole school run problem. However, the residual parking was evidently less in amount and it was dispersed over a wider area, compared to the prior situation surrounding the school entrance. The initial complaints from residents in neighbouring roads have gradually ceased. Parents have needed time to adjust and find alternatives to using the car.

Parents become educated and socially influenced by observing other parents, demonstrating that children can walk to school or be dropped off further away from school and walk the last leg of the journey in a safer and healthier street. The School Street is highly symbolic in this respect. It is yet unknown if and to what extent a School Street scheme could affect future school choices.

- 3.2.9 The existing 3 School Streets in Croydon were in 2018 judged by 2 separate panels of parking and road safety opinion leaders. The School Streets received recognition as winning entries at the British Parking Association Awards (2018, parking in the community category) and the London Road Safety Awards (2018, outstanding contributions to road safety category).

<https://stars.tfl.gov.uk/About/About>

- 3.2.10 A growing number of London boroughs are implementing School Streets. The Croydon officer with operational responsibility for School Streets attended a knowledge sharing session organised by London Borough of Hackney in December 2018, to discuss common issues, lessons learned and identify best practice. Discussions and comparisons made at this session, and the subsequent information exchanges with other boroughs within the network, has

validated to officers that the Croydon approach to School Streets represents current best practice.

3.2.11 Air pollution data was not collected for the pilot schemes. Such surveys now form part of the recommendations in the present report.

### 3.3 METHOD FOR SELECTING 8 NEW SCHOOL STREET PROPOSALS

3.3.1 In an email of 8 November 2018, 93 primary and junior schools were invited to request a School Street. 31 schools responded with a formal request. None of the schools responded unfavourably towards the School Street concept. The numbers and the strength of demands stated by the schools was higher than anticipated. Further 2 schools have responded after the initial assessment was completed and they will now be included for future consideration.

3.3.2 An objective method was used to rank the schools priorities. A factors weighting was derived by analytical hierarchy process, decomposing the decision-making problem into simpler pair-wise comparisons between each of the candidate factors. The conditions for each factor, at each candidate school was scored as being favourable, neutral or unfavourable towards a School Street scheme. The multiplied out scores have derived a priority ranking.

Factor	Weight	Assessment multiplier		
		Favour	Neutral	Unfav.
Risks to children and/or public order exist	33%	x +1	x 0	x -1
No impact on essential traffic (main road, bus etc)	28%	x +1	x 0	x -1
Situated within HSN area of interest	9%	x +1	x 0	x -1
Concerns expressed by the school	9%	x +1	x 0	x -1
Alternative travel exists, PTAL/CTAL > 2	7%	x +1	x 0	x -1
Air pollution and/or health issues exist	5%	x +1	x 0	x -1
School is registered for STARS accreditation	5%	x +1	x 0	x -1
Catchment distance, 75% < 20min walk	2%	x +1	x 0	x -1

3.3.3 The initial assessment identified 12 schools (in 11 locations) with favourable conditions. 7 locations are neutral, where it could be feasible to implement a scheme but conditions are not straightforwardly favourable and may require combination schemes. 12 locations have unfavourable conditions, such as too significant an impact on essential traffic and many local residents.

Table 2 – Schools selected for School Street consultation.

School	Post code	Ward
Norbury Manor Primary	SW16 5QR	Norbury and Pollards Hill
Fairchildes Primary School	CR0 0AH	New Addington South
Harris Academy Purley/Regina Coeli	CR2 6DT	Purley Oaks & Riddlesdown

Cypress Primary School	SE25 4AU	Crystal Palace & Upper Norwood
Winterbourne Junior Girls and Boys	CR7 7QT	Bensham Manor
Downsview Primary & Nursery	SE19 3XE	Norbury and Pollards Hill
Harris Primary Academy Kenley	CR8 5NF	Kenley
West Thornton Primary Academy	CR0 3BS	West Thornton

### 3.4 ENGAGEMENT

- 3.4.1 The informal consultation stage is an early engagement for purpose of gauging opinions and receiving feedback to verify the initial assumptions for a proposal. It is an invitation to residents, businesses and occupiers/operators of amenities within and immediately around the proposed zone to contribute their first-hand experiences and observations which are otherwise not obviously available to the local authority officers. The informal consultation letter (see Appendix 5) included that the results would be reported to this Committee.
- 3.4.2 The proposed School Street zones aim to be extensive enough to practically influence the traffic management objectives of reducing congestion and parking near to the school entrance, while being small enough to minimise the number of residents and businesses impacted by time restrictions on visitors and deliveries. A smaller zone results in a relatively shorter and more tolerable walking distance for visitors that at certain times must parking outside of the zone.
- 3.4.3 The consultees were invited to propose changes to the initial zone layout, within the constraints that it is only feasible to establish zone start and end points at appropriate road junctions, which present drivers with a realistic opportunity to select an alternative route and avoid leading drivers into a road where they would be forced to make difficult and potentially hazardous U-turns. The engagement effectively enabled the schemes being co-designed with the immediate community, before finalising and, if appropriate, recommending a formal proposal for wider public consultation under the statutory procedure.
- 3.4.4 An initial 680 consultation letters were issued on 28 January 2019. The questionnaires asked respondents to commit a Yes or No to the need for “traffic restrictions at the start and end of school days” and to provide comments. The consultation letter included a drawing of the proposed zone and answers to 15 frequently asked questions. Of the initial 141 responses, 116 were in favour of the proposal (82%). Several of the residents in opposition from outside the proposed zones stated they would in fact support the scheme, if the proposed zone is extended to also include their address. For example, at Harris Academy Kenley, representations from residents indicated that the initial proposal had possibly been too sensitive to keeping the 97 addresses in Little Roke Avenue outside of the zone. Similar comments, although fewer in numbers, were also received from the other areas. It was felt necessary to better understand the geographical limits and sensitivity of such views.



3.4.5 An additional 1,305 consultation letters were subsequently issued on 19 February 2019, to widen the engagement into an additional area ring around the 8 school locations and to include a third questionnaire option for extending the zone. The third option stated: “Yes, traffic restriction at start and end of school day is needed but should be wider than proposed”.

3.4.6 A total of 1,985 addresses received the consultation letters. 346 responses are received.

3.4.7 The TfL were asked, by email on 29 January 2019, for their initial views with regards to the Winterbourne Road proposal sharing a junction with the A23 Red Route. The TfL have not yet responded and will be asked again during the formal consultation.

3.4.8 Analysis of the responses:

- The responses are overall more in favour of the School Street than the experience from the 2017 pilot schemes. The 2019 responses are:
  - 25% are opposed to the proposal.
  - 69% are in favour of the proposal.
  - 4% are in favour, on condition the zones extend further than proposed.
  - 2% undecided.

Detailed breakdown, by scheme, is provided in Appendix 4.

- Variances between the response rates and opinions from addresses within, immediately outside and further outside the zones follow an anticipated profile that mirrors the general experiences from parking schemes.
- Variances in response rates from the different school locations follow an anticipated profile, which from general experience tend to be associated with the localised proportion of owned homes with driveways.
- Notably, the responses do not quote the publicity from the Council and the local press – e.g. the terms ‘modal switch’ and ‘active modes’ are not reflected. Respondents generally wish the best for the children, with less congestion and less hostility, as long as it doesn’t affect access to their own driveway.

Table 3 – Consultation responses summary by general stakeholder category.

Stakeholder category	Result	Headline comments
Address within the proposed zone (n=434)	44% response rate 15% against 71% for 14% for, with extension 1% undecided	Identify with the problems to be solved. Strong expressions of support for a School Street. Urging a speedy introduction. Need for all-time access to vulnerable relatives.

Address up to 100m outside the propose zone (n=491)	18% response rate	No majority view, but the largest group is against, for fear of worsening pre-existing access problems. Extending the zone by 100m (if possible) would swing views to a majority in favour.
	42% against 30% for 25% for, with extension 3% undecided	
Address between 100m and 300m outside the proposed zone (n=1,060)	6% response rate	Views somewhat indifferent on balance. Extending the zone significantly in size would swing to a majority in favour; but low response rate indicates weak interest/concern.
	31% against 30% for 36% for, with extension 3% undecided	
Wider public, other parties and special interest groups	Not measured at this informal stage	Needs of the emergency services, vulnerable road users etc will be considered in the final design and subjected to public consultation,

Table 4 – Consultation responses summary by the 8 locations.

Proposed location	Result	Headline comments
Norbury Manor Primary School (n=250, r=26, 10%)	15% against 54% for 27% for, extension 4% undecided	44% response rate and 100% in favour from addresses within the proposed zone. Respondents from addresses outside the zone are significantly in favour of an extended zone to encompass a further 220 addresses; but based on a 7% response rate.
Fairchildes Primary School (n=175, r=22, 13%)	32% against 36% for 32% for, extension 0% undecided	Demand for extending the proposed zone, from addresses outside the zone; but the low number of such responses (6 in 157 addresses) presently doesn't justify a decision. Concerns about displacement parking from grass verges outside the school, to grass verges in Comport Green.
Harris Academy Purley (n=155, r=32, 21%)	13% against 59% for 28% for, extension 0% undecided	Residents inside and outside the zone strongly in favour. Concern about displacement into Pampisford Road, which carries essential traffic. Residents in neighbouring small cul-de-sacs prefer similar zones in their roads; but difficult to justify based on low response and size of roads.

Cypress Primary School (n=175, r=62, 35%)	31% against 56% for 11% for, extension 2% undecided	57% response rate and 79% in favour from addresses within the proposed zone. 21% response rate and 62% opposition from residents in Auckland Road, at addresses within 100m distance of the proposed zone.
Winterbourne Junior Girls and Boys (n=450, r=76, 17%)	28% against 51% for 20% for, extension 1% undecided	51% response rate and 83% in favour from within the proposed zone. Majority of responses outside the proposed zone are in favour of a significant zone extension encompassing about 260 addresses, in 6 roads with 6 camera entry points. However, the outside response rate was just 7%.
Downsview Primary & Nursery (n=245, r=44, 18%)	25% against 48% for 23% for, extension 4% undecided	48% response rate and 95% in favour from within the zone. 54% against from addresses up to 100m outside the zone. 63% in favour from addresses more than 100m outside, with 36% demanding a zone extension. This demand would impact too significantly on essential traffic.
Harris Primary Academy Kenley (n=190, r=45, 24%)	36% against 42% for 22% for, extension 0% undecided	Mixed views both inside and outside the zone; but overall in favour of a zone starting at the junction with Lower Road. The zone will encompass 127 addresses. Starting the zone at the junction with Little Roke Avenue instead would result in difficult traffic circulation and disagrees with majority view.
West Thornton Primary Academy (n=345, r=39, 11%)	13% against 67% for 18% for, extension 3% undecided	62% response rate and 100% in favour from addresses within the proposed zone. 40% response rate and 75% in favour representation from residents 1–20 Brading Road, for the proposed zone to be extended to encompass their addresses.
Appendix 4 provides a more detailed breakdown of the results analysis.		

Table 5 – Consultation responses, quantification of comments.

Respondents	Qty	Comments
Opposing (r=87, 25%)  110 comments	36	Concern about impact caused in surrounding roads.
	17	Concern about access for visitors and home deliveries.
	10	Problems are real, but there must be a better solution.
	8	Too inconvenient for residents.
	7	Problems not severe enough to merit such restrictions.
	6	Will impose financial costs on residents.
	6	Many parents have no option and must use the car.
	4	Proposed 2 x 1.5 hour time periods are too long.
	3	Concern about access for/to disabled or vulnerable person.
	3	Would support restrictions if the zone was made larger.
	2	Concerned about reduced freedom of movement.
	2	Unfairly penalises residents for parents' behaviours.
	2	Makes neighbouring roads unsafe.
	1	Parents will simply arrive earlier.
	1	Will adversely affect my property value.
	1	School should provide drop-off and pick-up parking facility.
	1	Restrictions ok, but does not like enforcement cameras.
In favour (r=181, 52%)  AND  In favour, with an extension (r=72, 21%)  310 comments	56	Needed to improve access to my home/driveway.
	44	Needed to improve road safety.
	34	Needed to reduce congestion and bad parking.
	32	Needed to reduce aggression and altercations.
	19	Concern about impact caused in surrounding roads.
	17	It is long overdue; petitioned for years; implement soon.
	14	Needed to improve air quality.
	13	Yes, needed, but only if the zone is extended to my address.
	11	Needed to reduce damage to cars and property.
	10	Concern about future permit charges being introduced.
	9	Needed to discourage needless car use by parents.
	6	Concern about access for visitors and home deliveries.
	6	Needed to improve the local environment.
	5	Concern about access for/to disabled or vulnerable person.
	4	Concern about residents' ability to use temporary/hire vehicles.
4	Make Winterbourne Road one-way	
4	Needed to prevent parents leaving their engine running.	

	3	Proposed 2 x 1.5 hour time periods are not long enough.
	3	Visitors need to exit during operational times, but not entry.
	2	More education is needed to discourage car use.
	2	Proposed 2 x 1.5 hour time periods are too long.
	2	Would like more decision-information.
	2	Would like to be consulted on more options, not just one.
	1	Concerned about reduced freedom of movement.
	1	Consider issuing a fair warning for a first offence.
	1	Cyclists ought to dismount within zone.
	1	Extend zone to 5 min walking radius, to make effective.
	1	Make Abingdon Road one-way.
	1	Make Biggin Way one-way, as alternative to a School Street.
	1	Make Lower Road one-way.
	1	Make Thistlewood Crescent one-way southbound.
	1	Proposal will cause danger to children, unless extended.
	1	Signage/camera aesthetically sensitive to the small res. road.
	1	We need a CPZ in this neighbourhood (Downsview school)
	1	Would gladly pay for the permit.
Undecided (r=6, 2%)	1	Something needs doing, but do not want the restrictions.
5 comments	2	Does not resolve the problem, just displaces it.
	1	Restricts access for/to disabled/vulnerable person.
	1	Proposal ok, as long there are no charges.

3.4.9 The two primary concerns over School Street proposals relate to the displacement effect and the time restricted access for visitors and home deliveries.

Displacement:

The newly implemented School Street scheme is expected to result in an immediate worsening of parking problems in neighbouring roads. As described in section 3.2.8 above, however, this will be smaller in overall numbers and dispersed over a wider area. Car driving school parents will need time to adjust and find alternatives to using the car.

Visitors and home deliveries:

Access issues are in part mitigated by compromising the size of the restricted zones, where a smaller zone results in shorter and more tolerable walk for visitors who must park outside a zone. Care services and relatives of disabled and vulnerable residents within a zone will be eligible for an exemption permit (see section 7.2 below).

All day and heavy commercial operators, such as a builder renovating a resident's home for example, will be eligible for a temporary exemption to facilitate necessary access.

Parcel and home shopping delivery operators are mostly avoiding the problematic school streets during the start and end of the school day anyway, when it is practically very difficult to access and stop for unloading. The impact on home deliveries is therefore considered small and acceptable. Exempting the delivery operators would risk encouraging an increase in the number of deliveries made during the restricted hours and it would make the freed-up School Street available as a convenient short-cut.

Royal Mail will be exempt under its special legal status.

#### 3.4.10 Considerations for and against extending the proposed zones.

##### For:

- Accords with majority opinion, with a caution over response rates from addresses more than 100m outside the originally proposed zones.
- Would be more effective in encouraging a switch in travel mode.
- Contributes more towards the London Mayor's requirement for Croydon achieving a 5% car use reduction by 2021.

##### Against:

- Consultees' opinions are based on limited information and experiences of the possible impacts from a large School Street scheme.
- More residents will find difficulties in receiving visitors and deliveries during the times of School Street operation.
- Incorporating more streets with more entry points will demand a higher level of infrastructure investment and permit administration overheads.
- More driving errors are penalised.

3.4.11 On balance of consideration of the consultation responses, it is recommended to extend the originally proposed zones at Harris Academy Kenley and West Thornton Academy, as illustrated in the drawings in Appendix 1, where the strength of requests and the small scale of the extensions do not impact significantly on many more residents.

3.4.12 An extension to the proposal at Fairchildes Primary School is borderline uncertain, in respect of the considerations detailed in section 3.4.10. The consultation produced strong requests for extending the School Street zone to cover the whole length of Fairchildes Avenue and its 3 side roads. However, the response rate was low, possibly because residents from outside the proposed drawn zone had assumed they would not be affected. Also the now included Meridian Secondary School was not consulted on the full possible impact from such an extension.

It is therefore recommended to seek the views of the 3 schools, Fairchildes Children Centre, Fairchildes Primary and Meridian Secondary, with regards to the impacts on parents and the appropriate limits for extending the School Street zone. This can produce one of two outcomes:

- 1) The schools are against a zone extension: In such case, the default position is to proceed with formal consultation on the scheme as set out in Appendix 1 for Fairchildes Primary School.
- 2) The schools are in favour of a zone extension: In such case revert to a further informal consultation with residents and occupiers, this time enclosing a drawing that unambiguously shows the proposed extended zone. If residents and occupiers are subsequently also in favour, then seek a Delegated Decision to install the extended scheme under an experimental traffic management order and consult formally on making the experimental scheme permanent within 6 months of installation. The experimental procedure allows for adjustments be made, if the scheme develops problems or opposition.

3.4.13 The remaining requests for zone extensions are considered to either impact on essential traffic or impact on many residents who did not respond to the informal engagement. The informal engagement has not established sufficient quality of evidence for making the extension decision in these 5 locations. Consulting with a substantially revised proposal is considered unrealisable at present project capacity.

3.4.14 The strength of responses in favour to the proposals where not anticipated at the outset. The project officer's original assumption that the 8 consultations could result in just 5 schemes did not hold true. The consultation has identified real needs and has raised expectations in the community that all 8 schemes could now be provided. The strength of the responses reasons the recommendation to proceed with all 8 of the proposed schemes, subject to formal public consultation and subject to availability and approval for an additional capital budget allocation. If capital budget cannot be made available in the current financial year, then any remainder schemes can be referred for implementation after March 2020.

3.4.15 Meetings with all the 8 schools have identified the optimal operating times, as detailed in the drawings in Appendix 1.

## **3.5 FORMAL CONSULTATION**

3.5.1 The legal process for making a School Street Traffic Management Order requires formal consultation in the form of Public Notices published in the London Gazette and a local newspaper (Croydon Guardian). Although not a legal requirement, this Council also fixes street notices to lamp columns in the vicinity of the proposed scheme and writes to occupiers who are directly affected, to inform as many people as possible of the formal proposals. Parents

will be notified about the consultation through the schools and notices near the schools entrances.

- 3.5.2 Official bodies such as the Fire Brigade, the Cycling Council for Great Britain, The Pedestrian Association, Age UK, The Owner Drivers' Society, The Confederation of Passenger Transport and bus operators are consulted under the terms of the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. Additional bodies are consulted depending on the relevance of the proposals.
- 3.5.3 Once the notices have been published, the public has 21 days to comment or object to the proposals. Considering the *de novo* nature of School Streets, it is recommended the result of formal consultation be referred back to the Traffic Management Advisory Committee for consideration and for advising the Cabinet Member for Transport and Environment (job share) on the decision whether to approve the implementations of the Schools Streets. The objectors will be informed of the decision.
- 3.5.4 The 8 proposed zones and their individual operating hours are shown in Appendix 1.
- 3.5.5 Parking pressure surveys will be conducted in May 2019, to enable a before and after assessment of the impact on parking in neighbouring roads.
- 3.5.6 Air pollution survey have commenced, to enable a before and after assessment of air quality near the school entrance.

### **3.6 PRIVACY AND DATA PROTECTION**

- 3.6.1 The informal consultation letter described to residents and occupiers how the proposed School Street would be enforced using ANPR cameras, further explaining that the camera will focus strictly on the traffic entry point to the street. The ANPR camera cannot be turned or used for any other purpose, such as for spying or recording anti-social behaviour. Recordings are triggered solely on the detection and for the duration of a driving contravention. The ANPR camera has Department for Transport type-approval for its purpose.
- 3.6.2 ANPR is widely used in Croydon and beyond and are proven to feasibly operate within the Surveillance Commissioners Codes of Practice. Every individual ANPR camera will require a Privacy Data Protection Impact assessment to ensure its compliance. Subject to the schemes final approval, the assessments will be made prior to the cameras being switch on to collect images.

## **4 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

The cost of conducting the recommended consultation can be met within the established operations budget. There are no direct capital costs associated with the recommendation to consult in this report.



#### 4.1 Revenue and Capital consequences of report recommendations

The financial implications of this project are currently not fully developed and are pending the outcome of the formal consultation. A detailed financial model will be developed following the consultation and reported as part of the findings report.

If School Streets are introduced future income will be generated from the enforcement through the issue of Penalty Charge Notices. The School Street pilot schemes have demonstrated the ability to be self-financing usually within 2 years of introduction.

*Approved by: Flora Osiyemi, Head of Finance, Place, Residents and Gateway.*

#### 4.2 The effect of the decision

As detailed above it is likely that there will be a need to undertake additional investment and additional income will incur. The implications will depend on the final number of schemes that are recommended, following consultation, and on the number of cameras required per scheme. The following is an indicative average scheme cost, which is based on the established 3 pilot schemes.

##### Capital budget

Traffic Management Order, design and consultation	£3,240
Soft start presence in zone, staffing cost	£2,370
Services installation (electrification, fibre optics)	£5,270
ANPR camera (assume avg 1.3), DfT type certificate, installed	£32,500
Signs (top lit), installed	£2,400
Walking and cycling safety training events at school	£1,140
	<hr/>
	£46,920

##### Operational expenditure budget (annual)

ANPR enforcement	£17,200
ANPR system maintenance, comms lines and software license	£8,750
Penalty Charge Notices processing and collection	£12,500
Administrative overheads	£8,200
	<hr/>
	£46,650

The final income is indeterminate, as it depends on the nature of the localised traffic and effective changes in the compliance rate, as result of the scheme.

#### 4.3 Risks

There are no significant financial risks at this stage of the procedure, while the proposed schemes are not formally committed to.

## **4.4 Financial options**

- 4.4.1 Substituting the School Street scheme with information and training devices would save the indicated Capital Budget. The STARS scheme (see sec 3.2.7) is already demonstrating a level of success in non-School Street locations. The physical manifestation of the School Street provides a visually strong symbolic effect, however, which in combination with STARS enhances the behavioural impact potential. Either option, in isolation, will produce a lesser outcome.

The proposed School Streets will part fund the essential parallel activities. The activities to be coordinated with the commencement of the present individual School Streets include active travel safety training in the schools and the publication of targeted information in a school travel newsletter.

- 4.4.2 Substituting the School Street scheme with an elevated physical enforcement presence by Civil Enforcement Officers and using the CCTV smart car to enforce the school zigzag would be more resource demanding and less effective – i.e. is financially less efficient. It could help alleviate illegal parking, but it would not address car use and congestion. It would therefore not contribute to the desired change in car use behaviours.
- 4.4.3 Installing the scheme signs, initially without ANPR enforcement, and rely on incidental police enforcement for ensuring compliance. The cameras account for 70% of the capital expenditures, which could be postponed until affordable in future years. However, this would likely reduce the schemes effectiveness and would establish a perceivable precedence for the Council tolerating any non-compliance with the School Street. The subsequent introduction of ANPR could be perceived as an unfair step change in the compliance regime. The option is feasible, but not ideal.

## **4.5 Future savings/efficiencies**

ANPR cameras are a less resource demanding, more efficient approach to traffic and parking enforcement. The average operational cost per enforcement action will become lower from introducing ANPR camera schemes, such as School Streets.

## **5 LEGAL CONSIDERATIONS**

- 5.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance & Deputy Monitoring Officer that no direct legal implications arising from the recommendations.
- 5.2 The Local Authorities Traffic Order Procedure (England and Wales) Regulations 1996; require the giving of appropriate notices and the receiving of representations. Such representations must be considered by the members before a final decision is made.

- 5.3 If the proposals progress to decision, by virtue of section 122 of the RTRA, the Council must exercise its powers under that Act 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.
- 5.4 Recent High Court authority confirms that the Council must have proper regard to the matters set out at s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.
- 5.5 Section 149 of the Equality Act 2010 sets out the new public sector equality duty replacing the previous duties in relation to race, sex and disability and extending the duty to all the protected characteristics – i.e. race, sex, disability, age, sexual orientation, religion or belief, pregnancy or maternity, marriage or civil partnership and gender reassignment. The public sector equality duty requires public authorities to have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation.
  - Advance equality of opportunity, and
  - Foster good relations between those who share a protected characteristic and those who do not.
- 5.6 Part of the duty to have “due regard” where there is disproportionate impact will be to take steps to mitigate the impact and the Council must demonstrate that this has been done, and/or justify the decision, on the basis that it is a proportionate means of achieving a legitimate aim. Accordingly, there is an expectation that a decision maker will explore other means which have less of a disproportionate impact.
- 5.7 The Equality Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken – that is, in the development of policy options, and in making a final decision. A public body cannot satisfy the Equality Duty by justifying a decision after it has been taken.
- 5.8 Where ANPR is used, the Council must ensure it adheres to the Surveillance Commissioner Guidance and Information Commissioner Guidance, where appropriate.

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

## **6 HUMAN RESOURCES IMPACT**

- 6.1 The operation of 8 additional School Street zones will require increased permit administration, enforcement duties and Penalty Charge Notice processing.

The final Human Resources impact will be reported and approved subject to the outcome of formal consultation and final recommendations to follow.

## **7 EQUALITIES IMPACT**

- 7.1 An initial Equalities Impact Assessment (EqIA) has been carried out and it is considered that a Full EqIA is not required.

- 7.2 Concerns raised in the initial engagement about reduced access to disabled and elderly frail residents are mitigated by making the motor vehicles belonging to the following groups of drivers eligible for an exemption permit, to enable them driving in the School Street during the hours of operation:

- a) Schools buses and vehicles used in the transport of children and adults with special access needs, including private vehicles, taxis and minicabs declared for such use. The school may also request a temporary permit to enable car access for, say, a parent in a later stage of pregnancy or child with a temporary injury affecting mobility.
- b) Essential health and care visitors, including relatives of vulnerable residents.

The exemption permit is simply an electronic record in the compliance system and there is no need to physically affix anything to a vehicle. The permit is currently free (£0.00) and requested by email.

Motor vehicles belonging to the following groups and situations are automatically permitted to drive in a School Street, without first obtaining an exemption permit:

- c) Emergency services.
- d) Statutory Undertakers.
- e) Local Authority in pursuance of statutory powers, including refuse collection.
- f) Exemptions stated in the Highway Code, such as a medical emergency or with the permission or at the direction of a police officer.

## **8 ENVIRONMENTAL IMPACT**

- 8.1 The School Street schemes are expected to improve air quality at the school entrance. The reduced car use will further contribute to reducing congestion and air pollution in a wider area. It is recommended to quantify this improvement for future considerations, by measuring the air quality before and after introducing the presently proposed schemes.
- 8.2 The zone signs are designed to meet the Department for Transport specification and will naturally fit the street scheme. The addition of signs and cameras within the public realm is compensated for by reducing the visual impact of congested traffic and parking.

## **9 CRIME AND DISORDER REDUCTION IMPACT**

- 9.1 Hostility and aggressive behaviours are presently daily occurrences experienced by driving parents, other road users, school staff, residents and parking enforcement officers. The disorderly behaviours can be intimidating and sets a bad example to the high number of children that concentrate near the school entrance. The School Street schemes can significantly reduce and displace such disorder away from the school entrance.

## **10 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

- 10.1 The Council has reviewed and tried various options to reduce traffic and parking stress and improve safety around schools. The School Street pilots have been successful as described in this report so the recommendation is to introduce more such schemes where appropriate and in agreement.

## **11 OPTIONS CONSIDERED AND REJECTED**

- 11.1 The alternative option of not proceeding with the formal consultation would not accord with the expressed preference of the majority of those who responded to the informal consultation. It would also be a missed opportunity to relieve children, parents and residents from obstruction, road safety and air quality problems resulting from traffic and parking problems.
- 11.2 Increasing the conventional presence of Civil Enforcement Officers (CEOs) at peak times, as an alternative to the School Street, are demonstrated to be insufficient in resolving the chaotic and, at times, hostile traffic conditions, which occurs in the space where children and cars co-exist. CEOs do not have powers to direct or enforce moving traffic with regards to resolving congestion and discouraging car use. The lower financial efficiency of deploying CEOs also makes this option unaffordable in the longer term.

- 11.3 The Council, and the London Mayor's office, are already working with schools and parents in other ways to try encourage less car use; but nothing has yet emerged as equally effective as incorporating the School Street in the bigger scheme of helping to reverse the trend of the many more children now being driven to school.
- 11.4 The informal consultation received 2 specific suggestions to replace the proposed School Street zone at Winterbourne Road with a one-way scheme with no-entry from London Road instead, which was considered. The suggestion could help alleviate congestion at the narrowing points that result at the pre-existing priority sign and from illegal parking. However, it would not reduce the quantity amount of traffic and air pollution. It would not help to secure a perceivably healthy and safe street for pedestrian school children, as is necessary to convince parents to give up using the car. By example, the schools and residents with first-hand experiences of the existing equivalent no entry system in Cypress Road have indicated a continued problem and they support for the additional introduction of a School Street.

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**APPENDICES:**

- Appendix 1 – Drawings and particulars of the 8 proposed School Street schemes.
- Appendix 2 – Method for operating a Schools Street.
- Appendix 3 – School Street selection.
- Appendix 4 – Analysis of consultation questionnaires by individual schools.
- Appendix 5 – Copy of informal consultation letter.

**BACKGROUND PAPERS:**

None