

<b>REPORT TO:</b>	<b>TRAFFIC MANAGEMENT ADVISORY COMMITTEE</b> <b>24 July 2019</b>
<b>SUBJECT:</b>	<b>OUTCOME OF FORMAL CONSULTATION ON SCHOOL STREETS</b>
<b>LEAD OFFICER:</b>	<b>Shifa Mustafa, Executive Director, Place</b>
<b>CABINET MEMBER:</b>	<b>Councillor Stuart King, Acting Cabinet Member for Environment, Transport &amp; Regeneration (Job Share)</b>
<b>WARDS:</b>	<b>Bensham Manor, Crystal Palace &amp; Upper Norwood, Kenley, Norbury and Pollard Hill, Purley Oaks &amp; Riddlesdown, West Thornton</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 encourage 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> </ul>	
<b>FORWARD PLAN KEY DECISION REFERENCE NO.: 2719ETR</b>	
<b>FINANCIAL IMPACT:</b>	
<p>The required £395k capital expenditure will be fully funded from existing approved capital resources and the £210k revenue requirement will be fully funded from the issuance of Penalty Charge Notices arising from the implementation of this scheme. The costs of implementing the 7 School Streets structure will be operationally self-financing.</p>	
<b>RECOMMENDATIONS:</b>	
<p>That the Traffic Management Advisory Committee recommend to the Cabinet Member for Environment, Transport and Regeneration (job share) that they:</p> <ol style="list-style-type: none"> <li>1.1 Consider the objections and responses from the consultation on the Public Notice of 23 May 2019 (included in Appendix 1 to this report).</li> <li>1.2 For the reasons detailed within the report to introduce School Street schemes under the permanent Traffic Management Order procedure in the following 7 locations as detailed in the Public Notice of 23 May 2019: <ul style="list-style-type: none"> <li>• Abingdon Road (between Turle Road &amp; Upwood Road), at Norbury Manor Primary School.</li> <li>• Biggin Way (between Biggin Hill &amp; Downsview Road), at Downsview Primary and Nursery Schools.</li> </ul> </li> </ol>	

- Brading Road (between Cecil Road & Lavender Road) and Rosecourt Road, at West Thornton Primary Academy.
- Cypress Road, at Cypress Primary School.
- Goston Gardens (between Winterbourne Road & Oaklands Avenue) and Winterbourne Road (between London Road & Wiltshire Road), at Winterbourne Girls and Boys Schools.
- Kendra Hall Road, at Harris Academy Purley and Regina Coeli Primary School.
- Little Roke Road (between Lower Road & the north-western flank wall of No. 47 Little Roke Road), at Harris Primary Academy Kenley.

## **2 EXECUTIVE SUMMARY**

- 2.1 On 18 April 2019 and pursuant to the delegation under the Leader's Scheme of Delegation dated 26 June 2018, the Executive Director Place, following consultation with the Cabinet Member for Environment, Transport and Regeneration (job share) determined that it was appropriate to give Public Notice and formally consult on up to 8 School Street proposals. At its meeting on 2 May 2019 the Traffic Management Advisory Committee received a report on the result from an initial engagement and the decision to give Public Notice.
- 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.
- 2.3 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.
- 2.4 A Public Notice of consultation was given on 23 May 2019, inviting objections by 20 June 2019. The Notice and drawing for 7 proposed School Streets are included in Appendix 1 to this report.
- 2.5 24 objections were received from the 7 proposals. The consultation has not identified any material objections that would invalidate the objectives for introducing the 7 School Street schemes.
- 2.6 The report recommends the introduction of School Street schemes in the following 7 locations:

- Abingdon Road (between Turle Road & Upwood Road), at Norbury Manor Primary School.
- Biggin Way (between Biggin Hill & Downsview Road), at Downsview Primary and Nursery Schools.
- Brading Road (between Cecil Road & Lavender Road) and Rosecourt Road, at West Thornton Primary Academy.
- Cypress Road, at Cypress Primary School.
- Goston Gardens (between Winterbourne Road & Oaklands Avenue) and Winterbourne Road (between London Road & Wiltshire Road), at Winterbourne Girls and Boys Schools.
- Kendra Hall Road, at Harris Academy Purley and Regina Coeli Primary School.
- Little Roke Road (between Lower Road & the north-western flank wall of No. 47 Little Roke Road), at Harris Primary Academy Kenley.

2.7 The financial implications of implementing the 7 School Street schemes are £395k capital investment and full year revenue effect of £320k.

2.8 On 2 July 2019 and pursuant to the delegation from the Leader referenced above, determined that it was appropriate to refer consideration of the outcome of the formal consultation regarding the 7 School Streets to the Traffic Management Advisory Committee for onward recommendation and determination to the Cabinet Member for Environment, Transport and Regeneration (job share).

### **3 DETAILS**

#### **3.1 POLICY BACKGROUND**

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 2017 Annual Report of the director of public health 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.

## **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 persuading them to drive their child to school. This self-perpetuation element in the current situation demands a positive 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.

- 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 informed 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).

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.

3.2.12 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.

### **3.3 PRIOR ENGAGEMENT**

3.3.1 A survey on the Air Quality Action Plan (AQAP) in July 2017 found 76% of 356 respondents rated their views on air pollution as 'very important' and a further 14% rated their views as 'important'. 88% agreed that the AQAP healthy streets initiatives are important. 84% agreed it is important to improve air quality awareness at schools.

3.3.2 A survey on the future of transport for the draft third Local Implementation Plan (LIP3) in September 2018 found that 74% of 994 respondents are concerned about air quality in Croydon and 72% agreed that traffic levels should be lowered.

3.3.3 A survey of the general public (not necessarily people in the vicinity of a school) on the draft Parking Policy, in March-April 2019, described the objectives and timeline for introducing emission-based parking charges. In this prior engagement:

- 30% of respondents expressly supports the School Streets policy and plan.
- 9% of respondents had one or more concerns about School Streets, including:
  - 5% of respondents expressed a concern that the School Street does not address displacement of problem into neighbouring roads.
  - 3% were concerned that the School Street does not address fact that parents need to be able to drive, due to work or school's large catchment area.
  - The remaining concerns related to the School Streets not addressing worsening congestion, pollution and noise on main roads; opinions that car travel is safer for children (from road traffic and crime); suspicion that the Council is using the schemes to raise income; and that School Streets reduce access for residents.

3.3.4 After writing to 93 primary and junior schools on 8 November 2018, 8 locations were selected for a possible School Street.

Table 1 – 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

3.3.5 The outcome of the informal consultation on School Street was reported to this committee on 2 May 2019. This prior engagement reached 1,985 residents and occupiers in and immediately around the proposed School Street zones. The consultees were invited to reject or propose changes to the initial zone layout. In this prior engagement:

- 25% are opposed to the proposals.
- 69% are in favour of the proposals.
- 4% are in favour, on condition the zones extend further than proposed.
- 2% undecided.

3.3.6 As reported to this committee on 2 May 2019, the informal consultation near Fairchildes Primary School indicated a preference for a significant extension to the original proposal. After follow-up discussions with the secondary school and the children centre in the area, it was decided to re-consult residents informally with a revised proposal, this time enclosing a drawing that unambiguously shows the proposed extended zone. This matter is due to be considered further by the Executive Director Place under delegated authority.

### 3.4 STATUTORY CONSULTATION

3.4.1 The statutory consultation is concerned with the proposed 7 permanent schemes (not the proposed experimental scheme at Fairchildes). A Public Notice was given on 23 May 2019, with a 4-week consultation period until 20 June 2019 (see Appendix 1). The Notice details the proposed emission-based parking charges and invites objections. The communications plan for the Notice included:

- Publication in the London Gazette on 23 May 2019.
- Publication in the Croydon Guardian on 23 May 2019.
- Public Notices affixed to lampposts near to the 7 school entrances.
- Email notification to 23 interest groups throughout the borough, including the 3 emergency services and Transport for London.
- 1,010 consultation letters to residents and occupiers within and outside the proposed School Street zones.
- 1 Schools Bulletin article.

3.4.2 Parents are notified about the consultation through the schools and Public Notices placed near the schools entrances.

3.4.3 Total unique 75 responses were received by end of 20 June 2019, of which 24 (32%) are objections and 51 (68%) are in support of the schemes. 3 respondents objected to all 7 schemes. 1 respondents objected to 2 schemes. Table 2 shows to total number of objections and responses in support per scheme.

Table 2 – Responses by schemes

Scheme	Objections	Support
Abingdon Road, at Norbury Manor Primary School.	6	5
Biggin Way, at Downsview Primary and Nursery Schools.	5	5

Brading Road and Rosecourt Road, at West Thornton Primary Academy.	3	6
Cypress Road, at Cypress Primary School.	8	37
Goston Gardens and Winterbourne Road, at Winterbourne Girls and Boys Schools.	4	6
Kendra Hall Road, at Harris Academy Purley and Regina Coeli Primary School.	6	9
Little Roke Road, at Harris Primary Academy Kenley	10	6

The statutory procedure requires that the authority consider the responses to the formal consultation and provide responses to objections where these objections have not resulted in changes being made to the proposals and detailing the reasons why this is the case. The 51 statements in support for the emission-based permit charges are noted, but do not require a response under the statutory procedure. They will nonetheless receive a reply acknowledging their contribution.

Table 3 – Objections and the officer’s responses.

<p>Objections and concerns about <b>School Streets in general</b> (applicable to all proposed locations) and officer’s response</p> <p><b><i>“Implementing school streets just pushes the amount of cars back to other surrounding roads that are not included in the scheme.</i></b></p> <p><b><i>This is just a money making scheme branded as something for the benefit of children. If these parents needed to bring their cars home before walking to school or walk to school then returning home to collect their car to drive to work there would be negative repercussions for all”.</i></b></p> <p><u>Officer response:</u></p> <p>The scheme will result in an initial displacement of the residual car travel, with some school children being dropped-off and picked-up in neighbouring roads. However, this effect is reduced in amount, as result of a switch from car travel to walking and cycling, and is dispersed over a wider area.</p> <p>Parking enforcement officers will be present in the roads for the first weeks of the scheme becoming live, to prevent the establishment and acceptance of poor parking practices, while parents find alternatives to the car.</p> <p>The 3 pilot schemes have resulted in a significant uptake in children walking and a reduction in car use. Parents have needed time to adjust and find alternatives to using the car. Parents become informed and socially influenced by observing other parents, demonstrating that children can walk to school.</p> <p>The revenue from the School Street scheme is expected to pay back the installation costs in under 3 years. Using the schemes as a means to raise</p>
---

income would be inconsistent with the Road Traffic Regulations Act 1984. Any surplus from penalty charges are ring-fenced to highways and transport schemes and, for example, contributes significantly to sustaining public transport fare concessions such as the Freedom Pass.

***“Live next to Woodcote Primary School, where the scheme has simply displaced traffic onto neighbouring roads, increasing congestion and pollution. The school is in a Ptal 1a area - meaning little or no public transport - so a lot of parents have little or no alternative. There was no council support (ie traffic patrols) since the early days of the scheme. Since implementation the school catchment has ballooned to over 15km - meaning even more/longer car journeys”.***

Officer response:

The Woodcote School Street was an experimental scheme and lessons learnt from the pilot areas have been incorporated within the scheme proposals going forward. Residents within the pilot scheme area have remained in favour and a significant number of children are now walking, scootering or cycling to schools, where previously they were driven by car.

The newly proposed schemes are in areas which are rated by Transport for London to have a Public Transport Accessibility Level (PTAL) of at least level 2.

The newly proposed schemes will have parking enforcement officers present in the roads for the first weeks of the scheme becoming live, to prevent the establishment and acceptance of poor parking practices, while parents find alternatives to the car. Any resident can telephone the parking enforcement hot line to report issues. A mobile patrol is usually quick to attend.

The latest catchment area data for Woodcote school shows that the children on average live 1.7km walking distance from the school. 75% of children live within 2km.

***“What happens if this is rolled out on a wider basis across all schools in the borough? Will residents who rely on their cars not be allowed to leave their homes during school opening/closing times - is this not controlling the lives of the public?”***

Officer response:

Not all school locations are suitable for a School Street. In the current round of schemes, half of requests were found to have unfavourable conditions.

Residents and occupiers within a School Street zone are eligible for driving in the street at any time – i.e. they are not affected by the restrictions. There are also concessions in place for visitors to people with care needs.

Objections and concerns about School Streets in **Abingdon Road** at Norbury Manor Primary School, and officer's response

***"How will increased traffic in adjoining roads be restricted?"***

Officer response:

Experiences from introducing School Streets in other locations demonstrate that an initially traffic increase in the adjoining roads can be expected to ease off, as parents find alternatives to using the car. Parents become informed and socially influenced by observing other parents, demonstrating that children can walk to school.

Parking enforcement officers will be present in the roads for the first weeks of the scheme becoming live, to prevent the establishment and acceptance of poor parking practices, while parents find alternatives to the car.

The Council can consider traffic and parking control measures, in places where residual displacement remains unacceptable.

***"I am a resident on Colebrook Road and I object".***

Officer response:

The objection is noted.

***"I live on Upwood Road and I need access to Abingdon Road within those hours 14-16 I don't want any restrictions. THIS IS RIP OFF!"***

Officer response:

The objection is noted. The School Street is intended to help children and parents to use cars less and to walk, cycle and use public transport more. This requires that a healthier and safer environment is established at the school entrance.

Objections and concerns about School Streets in **Kendra Hall Road** at Harris Academy Purley and Regina Coeli School, and officer's response

***"My children attend and due to my active links with the school I am required to attend the school or bring a large amount of items during the proposed pedestrianised period. There are also those with mobility difficulties, which in some cases is my hindrance also. I am also intrigued to know what the proposal would be for residents who also drive and need to leave or return during the proposed times. Personally the illogicality of parents who can see that KHR is busy or blocked are the problem as appose to the pollution on that road. As much of the pollution is Pampisford Road".***

Officer response:

The school has authority to allocate a permit to its regular on-site visitors. Residents and people with recognised mobility or medical issues, who need access to amenities within the School Street zone are eligible for a permit. In accordance with the Highway Code for the particular traffic sign, it is the act of driving into the road that is restricted. Driving out of the road is permitted at any time. The scheme is considered in part because parents have difficulty judging the extent of congestion in Kendra Hall Drive before they drive into the road. The scheme will eliminate this problem.

***“I live in Columbine Avenue, the next road down so while you remove one problem, you’re moving it into the neighbouring road. The traffic flow here is horrendous at school drop off and pick up. Cars waiting with engines running I’m not sure how any of this is helping children that live here. Low emission zones should be for all. You’re just implementing this for revenue it seems”.***

Officer response:

The initially anticipated traffic increase in the adjoining roads is expected to ease off, as parents find alternatives to using the car. Parents become informed and socially influenced by observing other parents, demonstrating that children can walk to school.

The conditions in Columbine Avenue can be challenging at the start and end of the school day already. Any resident can telephone the parking enforcement hot line to report issues. A mobile patrol is usually quick to attend.

Parking enforcement officers will be present in the neighbouring roads for the first weeks of the scheme becoming live, to prevent the establishment and acceptance of poor parking practices, while parents find alternatives to the car.

***“My concern is that drivers will park on the drive and block the entrance to our flats [Felbridge Court]. This already currently happens, on 1 occasion I could not leave to get to a hospital appointment and other residents were also blocked from leaving. My fear is that this will only get worse”.***

Officer response:

The conditions in Pampisford Road can be challenging at the start and end of the school day already. Any resident can telephone the parking enforcement hot line to report issues. A mobile patrol is usually quick to attend.

Parking enforcement officers will be present in the neighbouring roads for the first weeks of the scheme becoming live, to prevent the establishment

and acceptance of poor parking practices, while parents find alternatives to the car.

Objections and concerns about School Streets in **Cypress Road** at Cypress Primary School, and officer's response

***"Nil".***

Officer response:

The objection is noted.

***"Relatives live in Sunset Gardens cul de sac and no other way to access their property other than via Cypress Road and need to visit at lunch time and early afternoon".***

Officer response:

The Public Notice, section 2, clarifies that residents in Sunset Gardens would become eligible for an exemption permit.

***"Proximity to the closest parking space outside of the zone is too far away for relatives to visit during the school street hours. I have elderly parents and siblings with two young children. Will negatively affect house value. Will financially impact us as residents due to having to book specific delivery slots for any type of delivery or service instead of an all day option. School street hours are too long and limiting. Issue is not that much of a problem for this to be implemented, the school street scheme is supposed to help not hinder residents. Suggestion to make the Cypress road and sunset gardens a no stopping zone with camera to implement fines for any drop offs or stopping (not parking)".***

Officer response:

Relatives or carer who visit a resident who is recognised as elderly frail or disabled and who is dependent on such visits are eligible for an exemption permit. Experienced delivery service companies would not attempt to deliver during the peak school times under the current conditions, when the road is practically impassable and there is not kerb space available for unloading. An all-day delivery option would therefore tend to practically translate into an off-peak time anyway. The School Street hours need to be long enough to discourage driving, including parents arriving earlier and wait for longer in their cars in the afternoon. No assessment has been made with regards to house values, but the scheme is intended to improve safety and public realm in the road. The use of CCTV and ANPR for parking enforcement on the street was restricted by the Deregulation Act 2015,

including in relation to parking contraventions of this nature and is therefore no longer a permitted method as suggested.

***"I object. My children go to Cypress Primary".***

Officer response:

The objection is noted.

***"1. We are concerned that the knock on effect on other nearby roads, in particular on Auckland Road and South Norwood Hill which we feel will become overly congested as a result as people look for alternative parking***

***2. We feel that the 08.00 till 09.30 in the morning and 14.00-16.00 the proposed timing restrictions are far too long and will have a unfair impact on local residents***

***3. What impact this will have on deliveries and suppliers trying to access local residents?***

***4. We are concerned that once the system is put in place there might be future proposal to introduce a parking permit scheme which will provide a further tax on the local residents. This is unacceptable.***

***5. In your response to the frequently asked questions you mentioned that conventional parking enforcement patrols only have limited short term effect. In the 12 years that we have lived in this area we have never seen a parking enforcement officer in the proposed restricted zone. We feel that even having a presents one or two times a week would have a significant improvement on the current situation. As it will change the behaviour of those dropping off or picking up children.***

***In addition to the above we have further concern that congestion zone is enforced all year around and does not take into account school holidays and bank holidays which puts unnecessary constrains on the local residents even when the school is not working. Would it be possible to suspend the School Street Zone during school holidays?***

***Would it be possible to relax the School Street Zone constrains for prearranged construction work and deliveries?***

***In summary, we do believe that something needs to be done to address the currently unacceptable traffic and parking problems at drop off and pick up times which will in turn improve road safety for walking children to school. However we do not agree with your proposal as planned for the restricted zone".***

Officer response:

1. Schemes will result in an immediate displacement in neighbouring roads. This will be smaller in overall numbers and dispersed over a wider area.

Parents will need time to adjust and find alternatives to using the car. 3 pilot schemes have resulted in a significant uptake in children walking and a reduction in car use. Parents become informed and socially influenced by observing other parents, demonstrating that children can walk to school. Traffic engineers are already working with residents in Auckland Road on identifying new measures to help their situation. The plan is to coordinate the Cypress Road School Street with these other measures.

2. The times are identified as necessary. For example, if the restriction is not in place at least 1 hour before end of school day, then experience shows that parents simply show up in advance and remain parked for longer. The act of driving into the street is restricted, and anyone may in fact drive out of the street at any time.

3. The restriction on visitors is a downside to the scheme, which has been weighed against the benefits the scheme brings. Visitors/relatives to residents with a care needs or, say, a daily in-home childminder are eligible for an exemption. Tradesmen and builders carrying out work inside the zone are eligible for an exemption.

4. Controlled parking and parking permits are only introduced where a majority of residents asks for it. One view on the school street is that it resolves a peak time parking problem and may in fact make it less likely for residents requesting parking controls.

5. Cypress Road already receives the additional parking enforcement patrols. Regrettably, this system is proving ineffective in achieving compliance with the parking restrictions and it does nothing about the number of cars entering into the road. The School Street is intended to address this.

The zone will only be enforced during school term. The scheme must use a legally approved road sign. The Department for Transport has not yet given approval to a pedestrian zone sign saying "during school term only". There is a concern that many drivers would be unable to know whether a particular school is in term or not. A London-wide working group are investigating possible options in this area, subject to subsequent approval by the Department for Transport.

Objections and concerns about School Streets in **Goston Gardens and Winterbourne Road**, at Winterbourne Junior Girls, Boys and Nursery Schools, and officer's response

***"I object to this scheme. I live in Oaklands Avenue, which is directly next to Winterbourne Road. Your proposed street scheme for Winterbourne will cause chaos. Currently, school traffic uses, and parks, in Oaklands Avenue to the extent that it is hard to drive down Oaklands or find a parking space during the school runs. Winterbourne parents often park in Oaklands, Goston Gardens and even as far as Warwick Road. By stopping parents using Winterbourne Road you will simply make the surrounding roads even worse than they are now. It won't stop parents using their cars as I'd***

***imagine a lot of them are trying to get to work and have to drive to try and be on time. It would be better if the school arranged for a walking bus, or an actual bus that picked up at fixed points away from the school”.***

Officer response:

The initially anticipated traffic increase in the adjoining roads is expected to ease off, as parents find alternatives to using the car. Parents become informed and socially influenced by observing other parents, demonstrating that children can walk to school.

The conditions in Oakland Avenue can be challenging at the start and end of the school day already. Any resident can telephone the parking enforcement hot line to report issues. A mobile patrol is usually quick to attend. The situation in Oakland Avenue will be monitored, with view to consider additional measures if necessary.

Parking enforcement officers will be present in the neighbouring roads for the first weeks of the scheme becoming live, to prevent the establishment and acceptance of poor parking practices, while parents find alternatives to the car.

***“As a long term residents of Winterbourne Road and living right opposite the school, I am totally object to this proposed pedestrian zone outside schools. It is very inconvenient for us residents. Though we have put up with mornings and afternoon runs but its fine for us. The parents should consider themselves leaving the cars outside Winterbourne (near the school) and walk their children to school, or they should not stop the cars in the rushnow on the street - to let their children out (this is where congestion happens). Hop you understand and take our opinion serious”.***

Officer response:

The School Street is intended to help children and parents to use cars less and to walk, cycle and use public transport more. This requires that a healthier and safer environment is established at the school entrance.

The 3 pilot schemes have resulted in a significant uptake in children walking and a reduction in car use.

Objections and concerns about School Streets in **Biggin Way** at Downsview Primary School, and officer’s response

***“The proposal to limit restrictions to only Biggin Way will increase the number of "drop offs" by approx 50% when using the Marston Way entrance. Biggin Hill has a left hand bend at White Lodge followed by the steepest part to Marston Way. The present congestion, bad driving, u-turns performed in this section has to be seen to be believed. Unless the restricted zone is increased to include Biggin Hill***

***it will cause even more chaos than already exists, and defeat the sole object of the restricted zone. Please explain the current thinking behind the proposal to only restrict Biggin Way”.***

Officer response:

The plan is to consider Marston Way for a School Street in 2020, once the ongoing construction works and related construction traffic has completed. The School Street zone start and end points must be set at appropriate road junctions, to present drivers with a realistic opportunity to select an alternative route and to avoid leading cars into a dead-end road system where it is difficult to turnaround. The length and steep section of Biggin Hill presents a difficulty in achieving this. The wider zone would effectively have to include the full length of Biggin Hill, from Beulah Hill to Brickfield Road. The Council and the community’s experiences of School Streets are not extensive enough to reliably predict the consequences of enclosing so many residential addresses. It is a scheme that can be reconsidered at a future date, once more experience is established and if more residents naturally wants such a solution. The scheme in Biggin Way is a more manageable size, for starters.

The conditions in the area can be challenging at the start and end of the school day already. Any resident can telephone the parking enforcement hot line to report an issue. A mobile patrol is usually quick to attend.

Parking enforcement officers will be present in the neighbouring roads for the first weeks of the scheme becoming live, to prevent the establishment and acceptance of poor parking practices, while parents find alternatives to the car.

***“I object to this scheme as I reside on Biggin Hill and the traffic at school start and finish times is horrendous. Parents park on curbs, grass and across residents’ driveways. Now the only entrance with vehicle access is right opposite our house facing Marston Way. There is road rage on a daily basis and never anyone to oversee congestion and the bloody mindedness of selfish individuals. Restrictions on Biggin Hill need to be in place and in conjunction with the undertaking of works on Biggin Way otherwise somebody will end up seriously hurt”.***

Officer response:

The School Street is intended to help children and parents to use cars less and to walk, cycle and use public transport more. This requires that a healthier and safer environment is established at the school entrance. The 3 pilot schemes have resulted in a significant uptake in children walking and a reduction in car use.

The conditions in the area can be challenging at the start and end of the school day already. Any resident can telephone the parking enforcement hot line. A mobile patrol is usually quick to attend.

Parking enforcement officers will be present in the roads for the first weeks of the scheme becoming live, to prevent the establishment and acceptance of poor parking practices, while parents find alternatives to the car.

Objections and concerns about School Streets in **Little Roke Road** at Harris Primary Academy Kenley, and officer's response

***"Parents with younger siblings need access to the school gates (or nearby) as is currently available".***

Officer response:

Parents and children for whom circumstances demand a continued use of the car must be parked further away from the school entrance and walk the last leg of the school journey. The School Street is intended to help children and parents to use cars less and to walk, cycle and use public transport more. This requires that a healthier and safer environment is established at the school entrance. The 3 pilot schemes have resulted in a significant uptake in primary school children walking and a reduction in car use.

***"I am not happy for this to go ahead. I often have deliveries coming to the house usually in the morning when I am at home. This restriction will be an inconvenience to my day to day activities. I also have family and friends who come to visit in the day so again this will be a nuisance to them".***

Officer response:

The restriction on visitors and deliveries is a downside to the scheme, which has been weighed against the benefits the scheme brings. Visitors/relatives to residents with a care needs or, say, a daily in-home childminder are eligible for an exemption. Tradesmen and builders carrying out work inside the zone are eligible for an exemption.

The proposed road sign restricts driving into the street. Visitors can in fact remain legally parked and do not have to clear the road when it comes into operation. Visitors can drive out of the zone at any time.

***"Will residents in Little Roke Avenue be exempt? I find the information and communication have been very poor. During the school run times, parking is fine, just more traffic. The problem is not being able to find any parking in the evenings after work".***

Officer response:

Residents in Little Roke Avenue would become eligible for permits for driving into the School Street. This is stated in the Public Notice.

The School Street is intended to help children and parents to use cars less and to walk, cycle and use public transport more. It is not concerned with evening parking.

***“The area marked for the pedestrian zone would affect Little Roke Avenue as well as this is the only way into the road although it is not a school road itself. Thus causing disruption to residents and visitors during school morning and afternoon times”.***

Officer response:

The residents’ survey in February 2019 found a majority view in favour of the current proposal, as opposed to a smaller zone starting at the junction with Little Roke Avenue, hence affecting Little Roke Avenue. Residents in Little Roke Avenue are eligible for exemption permits, which permit them to drive in the zone at any time.

***“A Controlled parking zone down Lower Road would be completely un-reasonable”.***

Officer response:

The consultation is not concerned with a controlled parking scheme suggested for Lower Road.

***“I would like to register my objection to the proposed pedestrian zone in Kenley. I Live in Little Roke Avenue and do not agree with the proposed plan for controlled parking. There is no parking issue in the road during the hours proposed”.***

Officer response:

The scheme is concerned with encouraging less car driving and road safety. It is not concerned with parking. Resident parking and driving remain unrestricted during the hours of operation of the proposed scheme.

Objections and concerns about School Streets in **Brading Road and Rosecourt Road**, West Thornton Primary Academy, and officer’s response

No specific objections are received for this location. 3 general objections covering this scheme are listed above.

3.4.4 24 objections is a low number, considering the amounts of communication detailed in section 3.4.1 above. 2 of the 24 objections have confused the School Street with controlled parking.

- 3.4.5 In conclusion, the consultation has not identified any material objections that would invalidate the objectives for introducing of the proposed 7 School Streets.
- 3.4.6 Under section 122 of the Road Traffic Regulations Act 1984, 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. The School Streets addresses objectives in the Third Local Implementation Plan (LIP3) 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.
- 3.4.7 Subject to the Cabinet Member for Environment, Transport & Regeneration (Job Share) agreeing to the recommendations in this report, each of the objectors will receive responses based on the officer comments in Table 3 above.

### **3.5 PRIVACY AND DATA PROTECTION**

- 3.5.2 The informal consultation letter described to residents and occupiers how the proposed School Street would be enforced using ANPR cameras. Residents will receive a further notification letter prior the scheme start, including being informed that the cameras are registered with the Information Commissioner's Office (ICO).
- 3.5.3 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 Data Protection Impact assessment (DPIA) to ensure its compliance. A DPIA is one of the ways that a data controller such as the Council can check and demonstrate that the processing of personal data is compliant with the General Data Protection Regulation (GDPR) and the Data Protection Act (DPA) 2018. There are statutory requirements to carry out a DPIA in Section 64 DPA 2018 and article 35 of the GDPR.
- 3.5.4 Section 6(1) Human Rights Act (HRA) provides that it is unlawful for a public authority to act in a way which is contrary to the rights guaranteed by the European Convention on Human Rights (ECHR). Therefore, in addition to the above, as a public body the Council must make sure that the systems comply with HRA requirements. Whilst the particular human rights concerns associated with surveillance tend to be those arising from Article 8 which sets out a right to respect for privacy, surveillance does also have the potential to interfere with rights granted under other Articles of the ECHR such as conscience and religion (Article 9), expression (Article 10) or association (Article 11).
- 3.5.5 The ANPR camera in question will be positioned so as to 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 monitoring other users of the road or recording anti-social behaviour. Recordings are triggered solely on the detection and for the duration of a driving contravention.

3.5.6 Subject to approval for implementation of the scheme, the necessary privacy and data protection assessments will be made and any mitigating actions implemented prior to the cameras being switched on to collect images. If the assessments identify a high risk to privacy that cannot be mitigated adequately, data protection law requires that the Council must consult the ICO before starting to process personal data.

### 3.6 IMPLEMENTATION

3.6.1 Subject to the decision to proceed, the implementation of the 7 School Streets will be scheduled for the first 3 schemes being in place in September 2019 and the remainder by January 2020. The current draft Traffic Management Orders will be finalised and signed prior to the schemes installation.

Table 4 – Schools selected for School Street consultation.

#	School	Anticipated introduction
1	Norbury Manor Primary	September 2019
2	Downsview Primary & Nursery	September 2019
3	Harris Academy Purley/Regina Coeli	September 2019
4	Winterbourne Junior Girls and Boys	October 2019
5	Harris Primary Academy Kenley	October 2019
6	West Thornton Primary Academy	Before January 2020
7	Cypress Primary School	Before January 2020

Note: The 8<sup>th</sup> scheme at Fairchildes Primary School is due to be considered further by the Executive Director Place under delegated authority.

3.6.2 Parking pressure surveys have been conducted, to enable a before and after assessment of the impact on parking in neighbouring roads.

3.6.3 Air pollution surveys are in process of being conducted, to enable a before and after assessment of air quality near the school entrance.

## 4 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

Implementing the recommendations of this report will commit the Council to £395k capital expenditure for the purchase of CCTV equipment and approximately £210k revenue expenditure to fund 3.5 new employee posts at scale 6 to deliver the service. £532k additional revenue is anticipated to be generated in a full year from the issuance of Penalty Charge Notices (PCNs).

The capital expenditure will be funded via £320k allocation from the Traffic CCTV Upgrade project and 75k allocation from the School Street ANPR project. The revenue expenditure will be wholly funded from the revenue generated from the additional issuance of PCNs and any surplus revenue from the scheme

will contribute to the overall cost of the Council's transport and traffic management programme.

## 1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2019/20	2020/21	2021/22	2022/23
	£'000	£'000	£'000	£'000
<b>Revenue Budget available</b>				
Expenditure	0	0	0	0
Income	0	0	0	0
<b>Effect of decision from report</b>				
Expenditure	104	211	215	219
Income	(178)	(532)	(532)	(532)
<b>Remaining budget</b>	<u>(74)</u>	<u>(321)</u>	<u>(317)</u>	<u>(313)</u>
<b>Capital Budget available</b>				
Expenditure	75	0	0	0
<b>Effect of decision from report</b>				
Expenditure	320	0	0	0
<b>Remaining budget</b>	<u>395</u>	<u>0</u>	<u>0</u>	<u>0</u>

## 2 The effect of the decision

The School Streets have a staged introduction, anticipated to commence in 3 locations in September 2019. The costs of implementing the 7 School Streets structure will be operationally self-financing.

## 3 Risks

Compliance and car use will change. PCN revenue has reduced 34% at the pilot sites, and 18 months on, the compliance is still improving (i.e. revenue is continually reducing). The schemes remain self-financing and brings important value through the road safety and air quality objectives.

## 4 Financial options

Substituting the School Street scheme with the STARS behaviour change scheme (see sec 3.2.7). This option, in isolation, will produce a lesser outcome. The proposed School Streets will part fund the essential parallel behaviour change activities.

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.

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 reduce the schemes effectiveness.

## **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.

6 *Approved by, Kate Bingham, Head of Finance on behalf of the Director of Finance, Investment and Risk and S151 Officer*

## **5 COMMENTS OF THE SOLICITOR TO THE COUNCIL**

5.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance & Deputy Monitoring Officer that Sections 6, 124, Schedule 1 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984 (RTRA) provides the Council with the power to implement the changes proposed in this report. This legislation gives a local authority the power to make Traffic Management Orders (TMO) among other matters, which prescribe streets which are not to be used for traffic by vehicles, or by vehicles of any specified class or classes, either generally or at specified times.

5.2 In making such Orders, the Council must follow the procedures set out at Schedule 9, Part III of the Road Traffic Regulation Act 1984 and detailed in the Local Authorities Traffic Orders (Procedure)(England and Wales) Regulations 1996 (the 1996 Regulations). The said Regulations, prescribe inter alia, specific publication, consultation and notification requirements that must be strictly observed. It is incumbent on the Council to take account of any representations made during the consultation stage and any material objections received to the making of the Order, must be reported back to the decision maker before the Order is made.

5.3 There are separate rules for experimental orders, as set out in Regulations 22 and 23 of the 1996 Regulations. These provide that the provisions on publication of proposals objections that apply to permanent orders shall not apply to an experimental order. However, no provision of an experimental order

shall come into force before the expiration of the period of seven days beginning with the day on which a notice of making in relation to the order is published.

- 5.4 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. These powers must be exercised so far as practicable having regard to the following matters:-
- The desirability of securing and maintaining reasonable access to premises.
  - The effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
  - 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.
  - Any other matters appearing to the Council to be relevant.
- 5.5 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.
- 5.6 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.
- 5.7 Section 149 of the Equality Act 2010 sets out the public sector equality duty in relation to 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.
- 5.8 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.
- 5.9 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.

- 5.10 Where ANPR is used, the Council must ensure it adheres to the Surveillance Commissioner Guidance and Information Commissioner Guidance, where appropriate. This will include ensuring that adequate Data Protection Impact assessments are undertaken prior to progressing any schemes using ANPR to implementation.

*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 7 additional School Street schemes will demand increased permit administration, enforcement duties and Penalty Charge Notice processing. The activities will be highest at the outset, while residents obtain exemption permits and motorists are becoming aware of the schemes. A review of the activity index calculates that 3.5 additional FTE posts will be required. The posts must be in place at least 1 month in advance of the School Streets commencing, while capacity for completing prior induction and training exists. It is recommended not to increase the establishment, but to fund the temporary posts from parking revenue while the schemes settle.

*The immediate HR impact is the recruitment to extra posts which will require Finance approval. Otherwise there are no other HR issues and if any arise these will be managed under the Council's policies and procedures.*

*Approved by Jennifer Sankar, Head of HR Place & Gateway, Strategy and Engagement on behalf of the Director of Human Resources, Sue Moorman.*

## **7 EQUALITIES IMPACT**

- 7.1 An Equality Analysis (EA) has been undertaken and was reviewed in response to the engagement on the Parking Policy and its section School Streets. The EA concludes that any equality and inclusion issues are incorporated and mitigating actions put in place.
- 7.2 Concerns raised in the informal consultation 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.

*Approved by: Yvonne Okiyo, Equalities 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 tried various options to reduce traffic and parking stress and improve safety around schools, including yellow line parking restrictions and enforcement. These measures have had limited success and cannot address moving traffic with regards to resolving congestion and discouraging car use. 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 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, is already practiced at problem locations. The persistence of complaints about parking pressure and non-compliance demonstrate parking enforcement 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 In the prior informal consultation in February 2019, respondents made 2 specific suggestions to replace the then proposed School Street zone at Winterbourne Road with a one-way scheme with no-entry from London Road instead, which was considered. This was considered then, as an alternative to School Streets in general. 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 the additional introduction of a School Street.

---

**CONTACT OFFICER:** Sarah Randall, Head of Parking, Extension 60814

**APPENDICES TO THIS REPORT**

Appendix 1 – Public Notice, ref: PD/CH/K15 of 23 May 2019.

**SUPPORTING DOCUMENTS**

1. <https://democracy.croydon.gov.uk/ieDecisionDetails.aspx?AllId=1181>
2. <https://www.croydon.gov.uk/transportandstreets/policies/third-local-implementation-plan>
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%20W eight%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_ Strategy_2016_21.pdf)
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>
8. <https://stars.tfl.gov.uk/About/About>

**BACKGROUND PAPERS:**

None