

Traffic Management Advisory Committee Supplementary Agenda



6. School Streets – Proposed New Experimental Traffic Management Orders at 10 locations (Pages 3 - 138)

This report makes recommendations on the future of 10 School Street schemes, which were implemented between September and November of 2020 under an Experimental Traffic Management Order (ETMO) that came into force on 1 September 2020.

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For General Release

REPORT TO:	Traffic Management Advisory Committee 21 March 2022
SUBJECT:	School Streets – Proposed New Experimental Traffic Management Orders at 10 locations
LEAD OFFICER:	<i>Sarah Hayward</i> – Acting Corporate Director Sustainable Communities, Regeneration & Economic Recovery <i>Steve Iles</i> - Director, Sustainable Communities
CABINET MEMBER:	Councillor Muhammad Ali Cabinet Member for Sustainable Croydon
WARDS:	Bensham Manor, Broad Green, Crystal Palace & Upper Norwood, Norbury Park, Old Coulsdon, Purley Oaks & Riddlesdown, Sanderstead, South Croydon, Woodside
<p>COUNCIL PRIORITIES 2020-2024</p> <ul style="list-style-type: none"> <p><i>We will live within our means, balance the books and provide value for money for our residents.</i></p> <p>The implementation of the recommended proposals is supported by council’s capital programme and the required funds are available from the Parking capital budget.</p> <p><i>We will focus on tackling ingrained inequality and poverty in the borough. We will follow the evidence to tackle the underlying causes of inequality and hardship, like structural racism, environmental injustice and economic injustice.</i></p> <p>The proposals in this report are intended to speed delivery of the Mayor of London’s Healthy Streets and Vision Zero objectives. They seek to help all to travel actively and sustainably, to walk and cycle, bringing benefits in terms of healthy weight, improved air quality, free/low cost travel, and meeting climate emergency objectives. These benefits are expected to accrue more strongly to the most deprived communities in the borough. They seek to make the streets available to children again, returning children’s independent mobility.</p> <p><i>We will focus on providing the best quality core service we can afford:</i></p> <p>The project is part of a wider programme focussed on providing safer street space in which people can choose to become more active, and in turn healthy, ultimately accruing savings to the NHS and Council care services.</p> 	
FINANCIAL IMPACT	

- The introduction of the proposed new Experimental Traffic Management Orders (ETMOs) including officer time and on-street signage changes is estimated to be £40,000
- In addition, the cost of collecting monitoring data (both traffic and air quality data) is estimated to be £108,000
- Budget to meet these costs is available from the operational capital budget for Parking

KEY DECISION REFERENCE NO.: 0722SC

The notice of the decision will specify that the decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee.

1. RECOMMENDATIONS

That the Traffic Management Advisory Committee recommend to the Cabinet Member for Sustainable Croydon that they:

- 1.1 Note that the School Streets Experimental Traffic Management Order (ETMO) (order reference 2020/30) in respect of the 10 school street areas identified at 1.4 below, effective from 1 September 2020 expired on 28 February 2022 (the 'Expired ETMO').
- 1.2 Note that 123 representations were received during the first six months of the Expired ETMO being in force (detailed in Appendix A) and that a petition was received from residents of Court Avenue / Tudor Close at full Council on 5 July 2021, the content of which is discussed, in section 4.3.10.
- 1.3 Note that the six month period for objection:
 - 1.3.1. coincided with school closures for the period from 13 December 2020 to 8 March 2021;
 - 1.3.2. did not coincide with a period of 'business as usual' traffic due to the ongoing Coronavirus pandemic and resulting periods of lockdown;
 - 1.3.3. contained inconsistent enforcement; and
 - 1.3.4. was not extended to enable objections to be received for six months from the point of amendment of the Expired ETMO on 30 October 2022;the result of which is that the objection period was insufficient for the Council to take a decision on progressing the expired ETMO to a permanent traffic regulation order.
- 1.4 That the Traffic Management Advisory Committee recommend to the Cabinet Member for Sustainable Croydon to introduce 10 School Streets at the following sites:
 - (i) Christ Church CofE Primary School (Purley Oaks & Riddlesdown)
 - (ii) Downsview Primary School (Norbury Park)
 - (iii) Ecclesbourne Primary School (Bensham Manor)
 - (iv) Harris Primary Academy Haling Park (South Croydon)
 - (v) Keston Primary School (Old Coulsdon)
 - (vi) Harris Primary Academy Croydon (Broad Green)
 - (vii) Oasis Academy Reylands (Woodside)
 - (viii) Ridgeway Primary School (Sanderstead)
 - (ix) St Thomas Becket Catholic Primary (Woodside)
 - (x) St Joseph's Catholic Junior School (Crystal Palace & Upper Norwood)By the making of 10 ETMOs to operate for up to 18 months as detailed at paragraph 4.2.1 of this report.
- 1.5 Authorise officers to inform the relevant stakeholders of the decision
- 1.6 To delegate to the Road Space Manager, Sustainable Communities Division to vary the ETMOs once made as part of the experiment.

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| 1.7 | Authorise officers to install the relevant equipment that allows the collection of traffic and air quality data for the 10 School Street sites. |
| 1.8 | Authorise officers to install the identified additional advanced warning signs at 4 School Street sites. |

2. EXECUTIVE SUMMARY

- 2.1 This report makes recommendations on the future of 10 School Street schemes, which were implemented between September and November of 2020 under an Experimental Traffic Management Order (ETMO) that came into force on 1 September 2020.
- 2.2 The original ETMO expired on 28 February 2022 and the schemes were removed from 1 March 2022.
- 2.3 During the first six months of the Expired ETMO coming into force, individuals were able to submit comments and objections to the Expired ETMO through the Council website (the 'Objection Period'). The comments received during the Objection Period are included as Appendix A to this report. Notwithstanding the public engagement received, during the Objection Period, COVID-19 pandemic restrictions introduced a lockdown in early December 2020, including the closure of schools. As a result, the council took the decision to suspend enforcement of all 10 experimental School Street schemes from 17 December 2020 to 8 March 2021.
- 2.4 In addition, the infrastructure including signage and ANPR enforcement cameras in respect of some of the schemes was not in place prior to the Expired ETMO coming into force on 1 September 2020. The signs and cameras were not all installed across all 10 School Streets until 7 December 2020.
- 2.5 The result of infrastructure delays, school closures and the suspension of enforcement meant that the schemes were not fully operational for a large part of the Objection Period. As a result, road users will not have experienced the true impact of the Expired ETMO as it would be in 'business as usual' conditions. Whilst the public did engage in providing comments in relation to the Expired Scheme, the Council does not consider it has been able to make a fair assessment on how the scheme performed for the full 18 months.
- 2.6 Additionally, the Expired ETMO was modified with a further order that came into force on 30 October 2020. However, due to an administrative error, the Objection Period was not extended as it should have been when the ETMO was modified under Section 10(2) of the Road Traffic Regulation Act 1984. As a result, less than the statutorily required 6 month Objection Period was provided.
- 2.6.1. The report explains the position in relation to the Expired ETMO in detail and that the recommendation to introduce 10 new individual ETMOs for the same School Street schemes will enable the gathering of robust evidence on which to base the decision on the long term future of each of the School Streets.

3. DETAIL

3.1 Background

- 3.1.1. On 8 July 2020, an officer report titled 'School Streets' (the 'July 2020 Report') (as attached in Appendix D) was put forward to TMAC to consider the informal consultation results for ten proposed school street schemes in Croydon. The report set out detailed consideration of issues such as existing road safety concerns, pollution around the school gates and the general need for sustainable travel needs to and from schools. It explained how school streets fitted in with national and local policy objectives. Save for where detailed in this report, the position in relation to these issues remains consistent with the July 2020 Report
- 3.1.2. First published in May 2020, the Secretary of State for Transport's statutory guidance 'Traffic Management Act 2004: Network Management to Support Recovery from COVID-19' called on local authorities to reallocate road space to people walking and cycling, both to encourage active travel and to enable social distancing. The Guidance highlighted the urgent need to change travel habits and suggested "measures should be taken as swiftly as possible, and in any event within weeks".
- 3.1.3. The Guidance has been updated over the intervening period. The most recent iteration published 30 July 2021 reminds local authorities that (following the publication of 'Gear Change' the government's Cycling and Walking plan for England), central government continues to expect local authorities to take measures to reallocate road space to people walking and cycling explaining that: *'The focus should now be on devising further schemes and assessing COVID-19 schemes with a view to making them permanent. The assumption should be that they will be retained unless there is substantial evidence to the contrary'*
- 3.1.4. Whilst this was new guidance in response to the Pandemic, Croydon for a number of years has had an active programme of works which promoted healthy travel such as implementation of school streets.
- 3.1.5. The council already has several existing School Street schemes in place, with the first being implemented in 2017 and the most recent set of 10 School Streets implemented under an ETMO in September 2020. A further 10 - 12 School Streets schemes are programmed to be implemented next financial year (2022/23) subject to funding and public consultation.
- 3.1.6. This report reports on what has been done since the decision emanating from the 8 July 2020 TMAC report (agenda item 8).

The Recommended Experimental School Streets

- 3.2 The 10 Experimental School Street schemes are listed in the table below, with details of what street(s) are restricted for each school and where the regulatory signs (compliant with the Traffic Signs and General Directions Regulations 2016) to enforce the restriction are located. All 10 School Streets prohibit access and egress by motor vehicles restrict motor vehicle entry between Monday to Friday during the hours of 8-9:30am and 2-4pm.

School Name	Streets affected	Position of regulatory signs
Christ Church CofE Primary School	Montpelier Road, between Brighton Road and the common boundary of Nos. 84 and 86 Montpelier Road	<ol style="list-style-type: none"> 1) On Montpelier Road at its junction with Brighton Road. 2) On Montpelier Road at its junction between the one-way section and 2-way section of Montpelier Road.
Downsview Primary School	Marston Way	<ol style="list-style-type: none"> 1) On Marston Way at its junction with Biggin Hill.
Ecclesbourne Primary School	Atlee Close	<ol style="list-style-type: none"> 1) On Atlee Close at its junction with Kimberley Road.
Harris Primary Academy Haling Park	Haling Road between the north to south arm of Haling Road and Selsdon Road	<ol style="list-style-type: none"> 1) On Haling Road at its junction between the one-way section and 2-way section of Haling Road.
Keston Primary School	Keston Avenue between its junctions with Coulsdon Road and Court Avenue	<ol style="list-style-type: none"> 1) On Keston Avenue at its junction with Court Avenue. 2) On Keston Avenue at its junction with Coulsdon Road
Harris Primary Academy Croydon	<ol style="list-style-type: none"> 1) Chapman Road, between its junctions with Kingsley Road and Fairmead Road. 2) Thomson Crescent, between its junctions with Kingsley Road and Euston Road 	<ol style="list-style-type: none"> 1) On Chapman Rd at the Allen Road junction with the roundabout. 2) On Chapman Rd at its junction with Kingsley Road. 3) On Thomson Crescent at the Euston Road junction the roundabout. 4) On Thomson Crescent at its junction with Kingsley Road.
Oasis Academy Reylands	<ol style="list-style-type: none"> 1) Oakley Road 2) Sandown Road 	<ol style="list-style-type: none"> 1) On Sandown Road at its junction with Portland Road. 2) On Oakley Road at its junction with Albert Road.
Ridgeway Primary School	Southcote Road between its junctions with The Ridgeway and the westernmost junction with Ellenbridge Way	<ol style="list-style-type: none"> 1) On Southcote road at its junction with The Ridgeway. 2) On Southcote road at its junction with Ellenbridge Way.
St Thomas Becket Catholic Primary	Dickenson's Lane	<ol style="list-style-type: none"> 1) On Dickenson's Road at its junction with Woodside Green. 2) On Dickenson's Road at its junction with Dickensons Place.
St Joseph's Catholic Junior School	Woodend	<ol style="list-style-type: none"> 1) On Woodend at its junction with Bradley Road.

4. Representations upon the Experimental School Streets

4.1 General

- 4.1.1. Following the previous cabinet member decision resulting from the 8 July 2020 TMAC, the council implemented 10 school street schemes using an Experimental Traffic Regulation Order (ETMO) which was made to be effective from 1 September 2020. ETMOs can remain in force for a maximum period of 18 months, which in this case expired on 28 February 2022.
- 4.1.2. Schemes introduced under an ETMO invite and must allow for objections to be made for a period of 6 months from the point they come into force. The comments received during this objection period must be considered by the Council in determining whether any changes should be made to the experiment whilst it is in force and in considering whether to proceed to a permanent TMO following the experiment.
- 4.1.3. In August 2020, letters were sent out to residents and the affected schools explaining that the Objection Period for the schemes will run between 1 September 2020 and 1 March 2021. Public notices were put up outside the schools and the council used platforms such as Twitter to publicise the upcoming Objection Period.
- 4.1.4. In order to make the process of submitting a representation as convenient as possible, the council along with the traditional method of being able to write in, also enabled receipt of objections and comments through its 'Get Involved' web platform. The online platform was well used with 121 of the 123 representations being made this way. This was set up so that representations would start being accepted from 1 September 2020 and automatically close on 1 March 2021. Details of all 123 representations are included in Appendix A.
- 4.1.5. On 26 October 2020, the original ETMO was modified with a further order that came into force on 30 October 2020. However, due to an administrative error, the objection period was not extended to ensure 6 months for objection from the point of modification as was required under paragraph 2 of Schedule 5 to the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996.

4.2 Recommendation – Introduce 10 new ETMOs and ensure that a minimum six month consultation period is provided

- 4.2.1. The ETMO introduced on 1 September 2020 expired on 28 February 2022, and the schemes have now been removed, with all regulatory signs covered over and enforcement stopped with traffic returning to as it was before the experimental schemes were introduced in September 2020. For the reasons set out in Section 2 of this report, 10 new ETMOs are now recommended to be introduced and made effective from 31 March 2022. If approved, it is at this point that all signs will be uncovered and the school street restrictions re-introduced. A new 6 month objection period will commence from 31 March 2022.
- 4.2.2. Should there be any modification to the schemes the objection period must be extended to ensure a full 6 months for objection from the point of modification and the public informed at the time accordingly.

4.2.3. The new schemes are not to be materially different to the expired schemes and officers can take forward some of the previous issues raised through the representations with a view to resolving them within the first 6 months.

4.3 Key issues – identified from representations received between 1 Sep 2020 – 1 March 2021.

4.3.1. In taking forward the new ETMOs, officers will consider the key concerns raised during the Expired ETMO Objection Period. These are presented below with a recommendation on how each can be addressed (where warranted) as part of the new ETMOs.

4.3.2. Inadequate publicity

4.3.3. There are 2 elements raised in relation to the issue of inadequate publicity:

- a) The council had informally consulted in January/February 2020 (not statutory consultation) and indicated to the public that the council would be providing a further round of consultation before the proposed schemes were to go live. The council subsequently changed its approach and decided to go down the ETMO route, which does not require a statutory objection period prior to the schemes being made live. This gave reason for the public to believe that council's communication had been inadequate/poor.
- b) Prior to implementation, the council had only written to residents within the school street extents and up to a distance of 250 metres beyond the scheme. This was for practical reasons and the fact that objections are not limited by distance. However, the decision to proceed with the ETMO was widely publicised through various news articles, press releases, social media platforms etc.

4.3.4. Officer Response - If it is agreed as per this report to proceed with new ETMOs, the same standard mechanisms for publicising the decision will be adhered to. As explained, by making new ETMOs, a further Objection Period is established providing anyone the opportunity to advance their views upon these measures before the Council decides whether or not make the measures permanent.

4.3.5. Inadequate scheme signage / driver entrapment

4.3.6. Members of the public have indicated that they felt that there was inadequate scheme signage in relation to the school streets. This was generally found to be for Haling Road, Keston Avenue, Southcote Road and Montpelier Road school street schemes. For these schemes the inadequate signage related to the fact that advanced warning signs had only been placed for those approaching from one direction and not the other. Many representations against the Haling Road school street also maintained that the enforcement signs at the restriction point were lacking sufficient visibility.

4.3.7. Officer Response - An officer visit to Haling Road School Street to establish visibility issues as given in the representations does not agree that visibility is an issue for the main restriction signs. It should be noted that signage for all the 10 school streets continues to comply with Traffic Signs General Directions 2016 (TSRGD 2016). However, in light of the high number of complaints regarding

the lack of advanced warning signs, the council will install additional warning signs for the 4 schemes.

4.3.8. Displacement of traffic/parking to neighbouring roads

4.3.9. This was reported as fears of likely to occur or that it had occurred following scheme implementation. Some representations went further to say that the previous traffic problems had shifted from the school streets to their own roads creating an unsafe environment for reasons such as speeding, congestion, more pollution, longer journey times etc.

4.3.10. Officer Response - Whilst officers cannot rule out that some displacement of traffic will naturally have occurred, it is noted the effects will be likely small and spread over a larger area, thereby removing a concentration of these problems from outside the school gates. However this has not yet been fully assessed due to lockdowns, enforcement suspension and the unusual travel patterns of the public during the pandemic.

4.3.11. As part of the new ETMO's the council will collect data to measure the effects of the experiments, both in terms of traffic impact and air quality. Monitoring equipment will be installed to assess traffic conditions and displacement, and also to monitor air quality in the School Streets themselves.

Petition from Court Avenue and Tudor Close – Keston Avenue School Zone

4.3.12. A petition containing 107 signatories of residents of Court Avenue / Tudor Close was received at Full Council on 5 July 2021. The petition related to the reports from residents regarding traffic issues being experienced following implementation of the experimental school street in Keston Avenue. The petition stated:

'We the undersigned residents of Court Avenue and Tudor Close Old Coulsdon, call on Croydon Council to act in OUR interests to reduce the speeding and extra traffic our road has suffered since the introduction of the School Streets scheme on Keston Avenue before there is a major accident. Parked vehicles have already suffered damage.'

4.3.13. The petition was reporting the same issues as already reported by individuals through representations sent to the council during the statutory Objection Period for the Keston Avenue School Street.

4.3.14. Officer Response - Whilst officers cannot rule out that some displacement of traffic will naturally have occurred, it is noted the effects will be likely small and spread over a larger area, thereby removing a concentration of these problems from outside the school gates. However this has not yet been fully assessed due to lockdowns, enforcement suspension and the unusual travel patterns of the public during the pandemic.

4.3.15. As part of the new ETMO's the council will collect data to measure the effects of the experiments, both in terms of traffic impact and air quality. Monitoring equipment will be installed to assess traffic conditions and displacement, and also to monitor air quality in the School Streets themselves.

4.4 Benefits realisation

4.4.1. The School Street schemes were proposed in response to calls by the local schools and residents to address concerns around poor air quality, traffic congestion and road safety on the named roads during school pick up and drop off times.

4.4.2. The council is leading on addressing the impacts of climate change, road safety and congestion outside schools by the introduction of a series of school streets, with the first launched in 2017 and more recently the 10 experimental schemes discussed in this report.

4.4.3. The council acknowledges that during the first few months of the school streets becoming operational there is likely to be some local disruption to normal travel patterns and behaviour, however studies show that as the scheme has an opportunity to bed in, often the early disruption dissipates and a focus turns into the benefits of such schemes.

4.4.4. In a recent request for feedback from the schools a question was asked on what impact the removal of the school street may have on them. Of the 10 schools, 8 schools responded and the responses are given in summary below:

4.4.5. *Marston Way* - I think removal of the school zone would result in going back to chaos on both roads and endangering our pupils and other pedestrians in the locality.

Oakley Road/ Sandown Road – No response provided

Thomson Crescent/ Chapman Road – No response provided

4.4.6. *Southcote Road* - removing the school zone will result in a negative impact - first and foremost, safety would be negatively impacted, but also there would be increased noise and air pollution. Increased parental aggression seen closer to the school as parents 'navigate' the limited parking on our road or park over driveways.

4.4.7. *Haling Road* - The school street has improved safety outside the school gates but has pushed the safety problem to the end of the road. Due to unclear parking restrictions and lack of parking enforcement, the end of the road can often become blocked due to selfish and unsafe parking. Since February 2021, parking enforcement support has been requested by the school on numerous occasions. The impact has been limited as enforcement officers have not been willing to enforce the rules. In fact, very often parking enforcement presence has made the situation worse as parents have seen that no action is being taken by the council.

4.4.8. *Atlee Close* - If the school street were to be removed then we would return to the previous situation which saw fewer children taking healthy and sustainable

options for travelling to school. We would see an increase in unsafe parking and increased risk to children outside of school. We would inevitably see an increase in arguments and confrontations between parents and/ or residents outside of the school.

4.4.9. *Keston Avenue* –

- The introduction of the School Street along Keston Avenue has made a significant difference to our children
- The road is obviously quiet now
- Before the introduction of the school street, Keston Avenue was busy, chaotic and could be dangerous to children at dropping off and pick up times
- I had complaints about parking, parking across drives, parking on the zigzag lines and also children being dropped off in the middle of the road.
- I had complaints from both residents of Keston Avenue and also my own parents due to their concern for the safety of the children
- Keston Avenue is now a much safer road for Keston children
- We sent reminders about parking out in our newsletters

4.4.10. *Montpelier Road* - Before the scheme was implemented pick up and drop off times was complete chaos, most parents would enter Montpelier road and park illegally over drive ways, on the markings outside the school or on pavements making the process very dangerous for children to enter the school. Some would just stop directly outside the school and let their children jump out of the car. The road would also get blocked for deliveries and emergency services. All these issues have now gone and the process of children entering or leaving the school is much safer, there are very few vehicles about so less likely to have accidents.

4.4.11. *Dickenson's Lane* - The School Zone has been very useful - the almost daily incidents of cars reversing dangerously and arguments with residents about cars blocking their drives has ceased completely. It has massively increased safety around Dickenson's Lane but it has also pushed a lot of the car drivers round to the school's front entrance at Birchanger Road - this road does need to be considered in terms of the volume of traffic at drop off and pick up. Further measures may need to be considered here, especially as we now have no road crossing person (lollypop person). More children's scooters have arrived in school from the Dickenson's lane entrance which might indicate a reduction in vehicles being used in school run. Complaints from Dickenson Lane neighbours have stopped since school street scheme was put in place. The original issues as mentioned above would instantly return.

4.4.12. *Woodend* - Removing the School Zone will impact in quite a negative way. We would see a return to parents blocking driveways and paths on Woodend, stopping outside the school gates on the yellow lines. It would be a disaster.

4.5 Officer Conclusion

- 4.5.1. For the reasons set out in Section 2, 4.2 & 4.3, officers recommend that ten new School Streets are implemented, consistent with the Expired ETMO but with minor upgrades to signage at four sites under new ETMOs.
- 4.5.2. The ETMOs will be implemented through regulatory signage compliant with the Traffic Signs and General Directions 2016 (TSRGD) at the entry and exit points of the School Streets. Contraventions of the School Streets will be recorded via approved Automatic Number Plate Recognition camera technology and enforced through the London Local Authorities and Transport for London Act 2003, with a Penalty Charge Notice issued under this legislation. The changes to signage address many of the concerns and criticisms levelled at the Expired ETMO.
- 4.5.3. The new ETMOs are proposed to be made effective from 31 March 2022 and a new 6 month objection period will commence. As soon as possible following the conclusion of the objection period, a report will be produced to TMAC on the impact of the schemes with recommendations for their future. This report shall take into account both the responses to the Expired ETMO and responses to be received in relation to the new ETMOs.
- 4.5.4. The schemes meet and support several of Croydon's transport objectives and priorities along with those within the Mayor of London's Transport Strategy. These are the reasons why Officers recommend their continuation so that their effectiveness can be fully assessed under normal traffic conditions outside of lockdowns.
- 4.5.5. The comments received from schools signify the importance of these schemes. The benefits far outweigh some of the impacts which the public has reported in their submissions however it would be fair to say that the full impact was not determinable.
- 4.5.6. If the officer recommendations are not agreed, the permanent removal of the school streets will follow. This will impact school children the most, and will likely see a return of the road safety concerns outside the school gates to the council before their introduction.

5. **FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

1. Revenue and Capital consequences of report recommendations

The introduction of the proposed new Experimental Traffic Management Orders (ETMOs) including officer time and on-street signage changes is estimated to be £40,000. In addition, the cost of collecting monitoring data (both traffic and air quality data) is estimated to be £108,000.

2. The effect of the decision

The making of the ETMOs and the implementation of the additional signage and monitoring equipment to support them will incur expenditure as set out above, with budget available from the existing operational capital budgets for Parking.

3. Risks

Revenue from parking charges (including ANPR enforcement) is a key source of income for the council. If the outcome of the new ETMOs was to remove the ANPR enforcement cameras across these 10 School Streets, this would result in a reduction of the projected income from 2022/23 onwards. Also, it is recognised that School Street compliance will change over time, and revenue is continually reducing. However, the schemes remain self-financing and bring important value through their road safety and air quality objectives.

4. Options

Substituting these 10 School Street schemes 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.

(Approved by: Gerry Glover, Interim Head of Finance Sustainable Communities)

6. **LEGAL CONSIDERATIONS**

- 6.1 The Council's external legal advisors comment on behalf of the Director of Law and Governance & Deputy Monitoring Officer that on 23 May 2020, the Department for Transport (DfT) made and brought into force the Traffic Orders Procedure (Coronavirus) (Amendment) (England) Regulations 2020 (SI 2020/536) (TOPCR 2020). The TOPCR 2020 makes temporary amendments to the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 (SI 1996/2489) (LATOPR 1996). This includes the insertion of "Temporary Provisions Applicable During the Coronavirus Pandemic". This establishes alternative publication requirements, which a local authority can adopt where it is required to publish a notice in a newspaper and the authority considers that it would not be reasonably practicable to do so because of the effects of coronavirus, including the restrictions on movement.
- 6.2 The LATOPR 1996 establish the procedures for making a traffic regulation order, (including an Experimental Traffic Regulation Order). The procedural provisions for Experimental Traffic Regulation Orders are set out in regulations 22 and 23 and Schedule 5 to the LATOPR 1996. It identifies the requirements of "the giving of appropriate notices" and the receiving of representations. Such representations must be considered by the members before a final decision upon whether or not to make a permanent Order is made.
- 6.3 If the proposals progress to decision upon these ETMOs, 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:
- 6.4
- 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.

6.5 High Court authority confirms that the Council must have proper regard to the matters set out at s122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.

Section 16 of the Traffic Management Act 2004

6.6 Section 16 of the Traffic Management Act 2004 imposes 'The Network Management Duty', namely it is the duty of a local traffic authority to manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives:

- 1.1 securing the expeditious movement of traffic on the authority's road network; and
- (b) facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.

The action which the authority may take in performing that duty includes, in particular, any action which they consider will contribute to securing:

- (a) the more efficient use of their road network; or
- 1.2 the avoidance, elimination or reduction of road congestion or other disruption to the movement of traffic on their road network or a road network for which another authority is the traffic authority.

Section 31 of the Traffic Management Act defines 'traffic' as including pedestrians. The Traffic Management Act 2004, Network Management Duty Guidance explains that the Network Management Duty requires the local traffic authority to consider the movement of all road users: pedestrians and cyclists, as well as motorised vehicles. It also explains that the overall aim of the "expeditious movement of traffic" implies a network that is working efficiently without unnecessary delay to those travelling on it. But the duty is also qualified in terms of practicability and other responsibilities of the authority. This means that the Duty is placed alongside all the other things that an authority has to consider, and it does not take precedence.

Section 149 of the Equality Act 2010 sets out the 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.

Part of the duty to have "due regard" where there is disproportionate impact will be to seriously consider taking 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.

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.

Where ANPR is used, the Council must ensure it adheres to the Surveillance Commissioner Guidance and Information Commissioner Guidance, where appropriate. The council's Parking Enforcement Team has carried out separate Data Protection Impact Assessments (DPIAs) for each camera and site.

The Greater London Authority Act 1999

- 6.7 The Greater London Authority Act 1999 places a duty on each London local authority to have regard to the Mayor of London's Transport Strategy when exercising any function. This therefore includes the exercise of its Traffic Management Duty and when deciding whether to make a traffic order.

The Health and Social Care Act 2012 and National Health Service Act 2006

- 6.8 The Health and Social Care Act 2012 sets a duty for improvement of public health by amending the National Health Service Act 2006 so as to require each local authority to take such steps as it considers appropriate for improving the health of the people in its area.

The Education Act 1996

- 6.9 The Education Act 1996 (as amended) places various duties on local authorities including the promotion of sustainable travel and transport modes for the journey to, from, and between schools and other institutions, explaining that “Sustainable modes of travel” are modes of travel which the authority consider may improve either or both of the following:
- (a) the physical well-being of those who use them;
 - (b) the environmental well-being of the whole or a part of their area.

- 6.10 The ‘Home to School Travel and Transport Guidance: Statutory guidance for local authorities’ explains that the sustainable school travel duty should have a broad impact, including providing health benefits for children, and their families, through active journeys, such as walking and cycling. It can also bring significant environmental improvements, through reduced levels of congestion and improvements in air quality to which children are particularly vulnerable.

The Crime and Disorder Act 1998

- 6.11 The Crime and Disorder Act 1998 places a duty on the local authority to consider crime and disorder implications of exercising its various functions. It is the duty of each authority to exercise its various functions with due regard to the likely effect of the exercise of those functions, and the need to do all that it reasonably can to prevent crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment).

Human Rights Act 1998

- 6.12 Regard should be had to the provisions of the Human Rights Act. In particular, the provisions of Article 1, of the First Protocol protection of property and Article 8, right to respect for private and family life. Access for those choosing to walk or cycle or use the bus has been aided by the school streets. In addition residents of the individual School Streets will be granted exemption to use motor vehicles in the street during the operational hours. Further, the right under Article 1 is qualified rather than absolute, as it permits the deprivation of an individual’s possessions or rights where it is in the public interest. The public interest benefits of the recommended experimental scheme are outlined within this report.

- 6.13 In relation to Article 8, the right to respect for private and family life has a broad interpretation and extends to being in a public place if there is a reasonable expectation of privacy there. This right can be interfered with where lawful, necessary and proportionate to protect a number of other concerns including public safety and health. It is not considered that the implementation of the school streets experiment impeded on the right to individuals' right to respect for private and family life, either in public or on private land, nor would the making of the recommended further experimental traffic order. Traditionally 'family life' extended out into the street where siblings would play and children walk together to school. The school streets proposals seek to allow this to happen again.

(Approved by: Olawale Adebambo, Interim Corporate Solicitor, on behalf of the interim Director of Legal Services & Interim Deputy Monitoring Officer)

7. HUMAN RESOURCES IMPACT

- 7.1 There are no immediate HR impact issues in this report for LBC employees and staff. If any should arise these will be managed under the Council's Policies and Procedures.

Approved by Gillian Bevan, Head of HR, Resources and Assistant Chief Executives, for and on behalf of Dean Shoesmith, Chief People Officer.

8. EQUALITIES IMPACT

- 8.1 The Equality Act 2010 introduced the Public Sector Equality Duty. This requires all public bodies, including local authorities, to have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - Foster good relations between people who share a protected characteristic and those who do not.
- 8.2 An Equalities Impact Assessment (EqIA) has been completed for the introduction of the new ETMOs for the School Streets, and is included in Appendix C.
- 8.3 The School Streets operational concept is unchanged since they were first introduced 2017. This project is intended to restrict access for motor traffic except resident permit holders, cyclists, emergency services and certain other groups such as carers and those with disabilities. The impact will benefit the more vulnerable – such as pregnant mothers, children, those with debilitating respiratory illnesses with secondary health benefits for the wider communities.

8.4 Feedback from the representations received as part of the statutory consultation on the original ETMO introduced dating back to 1 September 2020 has not raised any new or emerging equalities issues. The implementing team has considerable practical experience of operating School Streets since 2017, and will bring forward during this experimental phase lessons learned in its operation. The intent being to inform any final decision on continuity.

There is some negative impact in regards to Age, Disability & Pregnancy & Maternity however, the team has in place mitigation to address these including making provision for schools to request temporary access if ne

8.5 Should the proposed experiment prove **successful a full and extensive** EqIA review will be carried out based around the project plan as part of any long term changes to the operational methods or in response to any feedback or concern.

Approved by Gavin Handford on behalf of Denise McCausland, Equality Programme Manager

9. ENVIRONMENTAL IMPACT

9.1 The School Street schemes are expected to reduce car use, which in turn will contribute to reducing congestion and air pollution in a wider area.

9.2 The 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.

9.3 Central government's 'Decarbonising Transport A Better, Greener Britain' commitments to 'Increasing cycling and walking' has the aim that half of all journeys in towns and cities will be cycled or walked by 2030. It explains that implementing the Plan will deliver significant benefits in other areas as well as cutting CO2 emissions, including:

- improved air quality;
- better places to live in;
- reduced congestion and noise; and
- increased reliability and affordability of transport/access – '*delivering better transport for everyone*'.

10. CRIME AND DISORDER REDUCTION IMPACT

10.1 Hostile 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 set a bad example to children. The School Street schemes can significantly reduce and disperse such disorder away from the school entrance where a concentration of children exists.

10.2 Rude or threatening behaviour towards others is not acceptable and should be reported to the Metropolitan Police for investigation and appropriate action. This can be reported anonymously by victims although it is appreciated that on occasion in order for it to be dealt with effectively the Police could need witness

statements or for anonymity to be waived. These are matters for the Police and the individual to consider.

11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

11.1 For the reasons set out in the report, officers have made the recommendation for the ten experimental; school streets to be re-introduced under new ETMOs.

12. OPTIONS CONSIDERED AND REJECTED

12.1 The option to not re-introduce the schemes has been considered and rejected for the reasons set out within this report and:

- The School Street schemes were implemented in response to calls by the local schools and residents to address concerns around poor air quality, traffic congestion and road safety on the named roads during school pick up drop off times. London Borough of Croydon, has the highest level of childhood (0 to 9 years) asthma related hospital admissions and the 3rd highest death rate attributed to air pollution in London.
- School Street schemes aim to address some of those concerns by encouraging the use of more sustainable active forms of travel to and from school. Studies have shown that children who chose to walk or cycle to school arrive more alert, happier and are ready to study. School Streets thereby contribute to both better learning opportunities and health outcomes for the children.
- The London Mayor's Transport Strategy (MTS) published in 2018 has a transport objective to make 80% of all trips in London to be made on foot, by cycle or public transport by 2041. This will be achieved by reducing Londoners' dependency on motor vehicles in favour of active and sustainable modes of travel.

13. DATA PROTECTION IMPLICATIONS

13.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

YES – for the purposes of receiving statutory objections and representations and using the data collected during the Objection Period to make an informed decision on the future of the schemes. The council will also use Automatic Number Plate Recognition Cameras (ANPR) to enforce the schemes, these cameras were already in place when the original ETMO was in force.

The camera focuses strictly on Vehicle Registration Marks (VRM) only as motor traffic enters a school street. The ANPR camera can't be turned on or used for any other purpose, such as for recording anti-social behaviour or general viewing.

Recordings are triggered solely on the detection and for the duration of a driving contravention.

ANPR is widely used in Croydon and beyond and are proven to feasibly operate within the Surveillance Commissioner's Codes of Practice. Every individual ANPR camera will require a Data Protection Impact Assessment (DPIA) to ensure its compliance. The DPIA for ANPR cameras are conducted and stored by colleagues in the council's Parking Enforcement Team.

HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

YES

(please see attached copy in Appendix B of this report)

Approved by: Acting Corporate Director – Sustainable Communities, Regeneration and Economic Recovery)

CONTACT OFFICERS: Jayne Rusbatch, Head of Highways & Parking Service –
Tabrez Hussain, Principal Engineer

APPENDICES TO THIS REPORT:

Appendix A – Representations received during original ETMO statutory consultation period

Appendix B – Data Protection Impact Assessment

Appendix C – Equalities Impact Assessment (EqIA)

Appendix D – Traffic Management Advisory Committee report dated 8 July 2020 (also available on the council's website [here](#))

Appendix A – Representations received in response to ten Experimental School Streets

- 1) **Consultation ID:** 6289342 **NOT SUPPORTIVE**
School Street/s: Marston Way
Objection/Representation: I would like to bring to your attention the impact that the Marston Way / Biggin Way School Street scheme is having on the residents of Biggin Hill. While your scheme is trying to discourage parents from using cars, what actually seems to be happening is parents using alternative roads to park on. Residents of Biggin Hill have noticed an increased number of cars parking on Biggin Hill during peak school drop off/collection times. The amount of traffic on Biggin Hill has also significantly increased during peak times. Residents of Biggin Hill have complained multiples times about the lack of traffic calming measures on Biggin Hill - so now that you have diverted traffic to Biggin Hill due to the implementation of this scheme, Do you intend to turn your attention to Biggin Hill now? Also the residents of Biggin Hill will also need permits to use Biggin Way seeing as we are also impacted.
- 2) **Consultation ID:** 6289580 **NOT SUPPORTIVE**
School Street/s: Marston Way
Objection/Representation: Your School Street scheme on Biggin Way/Marston Way has pushed traffic onto Biggin Hill. We are also competing against parents dropping/collecting their kids for parking spaces outside our houses at peak times. Please look at traffic calming measures on Biggin Hill, seeing as you have now made the problem worse for us...
- 3) **Consultation ID:** 6292631 **NOT SUPPORTIVE**
School Street/s: Oakley Road & Sandown Road
Objection/Representation: I understand the thinking behind introducing this scheme but I am concerned about the impact on parking spaces for the surrounding streets not included in the scheme. I live on Watcombe Road where there is already limited parking for residents as there are no resident permits in place. It is not clear where school traffic will be expected to park as a result of the scheme but it seems likely it will be on neighbouring roads. For non residents who currently use Sandown/Oakley Road to park, again they are also likely to look for alternative parking on neighbouring roads. There is already an issue with local car dealerships/repair businesses using the area for parking their vehicles and I believe the school street scheme will only compound the current issues with parking and negatively impact residents. I also question what impact the scheme will actually have on reducing traffic/pollution for school children as it seems likely that school traffic will still need to stop relatively nearby in order to drop off children. I would be in favour of introducing resident permits for roads in the surrounding areas in order to reduce the negative impact on parking that the scheme is very likely to have for local residents.
- 4) **Consultation ID:** 6301685 **SUPPORTIVE**
School Street/s: Oakley Road & Sandown Road
Objection/Representation: I am in favour of this scheme because it tackles pollutions and makes the roads safer for my child.
- 5) **Consultation ID:** 6330082 **INDETERMINABLE**
School Street/s: Oakley Road & Sandown Road
Objection/Representation: As the Government has stated that because of COVID-19, all schools will be closed until further notice. Does this mean you will be turning off

Appendix A – Representations received in response to ten Experimental School Streets

the cameras on the roads where schools are? I ask because I was sent a letter advising me of a fine as I had used a road that was closed to traffic during school time. It does not state if the fines will only be applied during school term time.

- 6) **Consultation ID:** 6338712 **SUPPORTIVE**
School Street/s: Oakley Road & Sandown Road
Objection/Representation: I think this is a brilliant idea, it's reducing the amount of car fumes the children are being forced to breathe in while at school. It is also making it safer at drop off and pick up times, when people do stick to it. Unfortunately despite there being signs at the end of the roads, there are still people driving up and down the roads during the specified times. There needs to be some form of deterrent to stop those ignoring the signage.
- 7) **Consultation ID:** 6338840 **SUPPORTIVE**
School Street/s: Oakley Road & Sandown Road
Objection/Representation: As been wonderful to have less traffic on the way to and from school.
- 8) **Consultation ID:** 6304129 **INDETERMINABLE**
School Street/s: Southcote Road
Objection/Representation: The School Street scheme was starting on 1st September but no road signs have been put in place (as of 14/10/20) as shown in plans. If the road signs are not in place then the scheme has not yet started because people are unaware of restrictions. Has the experimental period been delayed ?
- 9) **Consultation ID:** 6306875 **SUPPORTIVE**
School Street/s: Southcote Road
Objection/Representation: I support this scheme. It has significantly reduced traffic in Southcote Rd without excessively affecting parking in neighbouring streets. It provides valuable additional space to allow social distancing. It is also allowing older children to walk safely away from the school to meet parents, thereby freeing up space close to the school. I would like to see signs stating the hours of the enforcement zone at both ends. The vehicles currently driving in tend to be vans and without adequate signage they must be able to appeal any fines on grounds of not knowing.
- 10) **Consultation ID:** 6306942 **NOT SUPPORTIVE**
School Street/s: Southcote Road
Objection/Representation: Very difficult to turn or go back if you go down this road. Also used often by residents. Also no notification to residents in surrounding roads. Very poor communication from Croydon Council again! Also signs very poor and easily missed for all of the scheme.
- 11) **Consultation ID:** 6340577 **SUPPORTIVE**
School Street/s: Southcote Road
Objection/Representation: I feel that the School Street scheme has had a resoundingly positive effect on Southcote Road since September 2020. The road is much quieter and safer for school children both in the mornings and after school. It has stopped the consistently reckless and inconsiderate driving and parking which used to be a daily occurrence outside Ridgeway Primary School and has created a calm and safe environment for the children. I think it has also encouraged more

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children to walk to school which is also another positive result of the scheme. I fully support the School Street scheme and hope it will continue after the consultation period ends. Please contact me if you require any further comment.

- 12) **Consultation ID:** 6340778 **SUPPORTIVE**
School Street/s: Southcote Road
Objection/Representation: I support the scheme. It has made the road noticeably safer and facilitated more children walking and cycling to school. Also providing space for social distancing for parents and families outside the school.
- 13) **Consultation ID:** 6340785 **SUPPORTIVE**
School Street/s: Southcote Road
Objection/Representation: The scheme so far has been brilliant and makes the road immediately outside of Ridgeway School much safer.
- 14) **Consultation ID:** 6340869 **SUPPORTIVE**
School Street/s: Southcote Road
Objection/Representation: Brilliant. Much safer for children and parents. Has encouraged more children to cycle to school. Also perfect for social distancing
- 15) **Consultation ID:** 6343421 **NOT SUPPORTIVE**
School Street/s: Southcote Road
Objection/Representation: The hours of enforcement are unnecessarily long, I have lived near Ridgeway school for about 20 years, the area is only congested at drop off & pick up times, ie 0830-0900 & 2.45pm - 3.15pm, by 3.20 the traffic has gone. I cannot see any reason to enforce the closure outside these times as the children are either in school or have gone home. The pre & after school clubs/activities cause negligible traffic. Croydon has the longest hours of enforcement of any London borough, at 3 hours 30 mins, Camden, Westminster, Redbridge, Waltham Forest only close their school streets for 1 hour 30 mins, many others are about 2 hours, why such a huge variance. The scheme does not reduce congestion but displaces it to already congested side roads. It creates more pollution by making people drive further to avoid the zone. I am against this scheme, I believe it is just a way of raising revenue.
- 16) **Consultation ID:** 6343552 **NOT SUPPORTIVE**
School Street/s: Southcote Road
Objection/Representation: I am not debating the zone making the air cleaner nor improving the safety of children. While very annoying for any driver parent on a rainy day, these are probably positive outcomes of the initiative. But the markings of the zone are certainly lacking, inappropriate and insufficient. There is no chance of someone driving a car, especially a small car with limited view upwards, turning into the restricted street as you would, will ever noticing and considering the complexity of the situation - creating an un fair and expensive trap for many drivers. The signs are way too high and nor clear enough. There should be VERY clear warning painting on the tarmac itself, an there is absoluteluy none. As a parent, it's reasonable for me to be happy with the positives - but as a driver, I think that the way this zone has been implemented is not an ergonomic job, and a deliberate trap, serving to unfairly punish many road users. For the zone to work in a fair way, please consider painting the road on both entry points with a big and very clear warning pattern of some sort, and please

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make the vertical signs readable and understandable at a glance by a driver from an actual car.

- 17) **Consultation ID:** 6340778 **SUPPORTIVE**
School Street/s: Southcote Road
Objection/Representation: I support the scheme. It has made the road noticeably safer and facilitated more children walking and cycling to school. Also providing space for social distancing for parents and families outside the school.
- 18) **Consultation ID:** 6295431 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: This is the only reasonable access from the Brighton Road to Selsdon Road - the other Road via the Swan and Sugar loaf is too congested and very difficult to execute a right turn into since the Tesco Carpark opened.
- 19) **Consultation ID:** 6299527 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: This Road is a necessary through route for traffic traveling between Brighton Road into Selsdon Road. By you closing the road at Rush Hour times you are increasing journey times for motorists, creating traffic congestion on other roads, creating more unnecessary pollution and diverting traffic to already over congested roads. There has been no publicity put out by the Council on this rather ill thought-out scheme. The signage put in place is inadequate and unless you are aware of the scheme being put in place, a motorist is not able to see the signage. I would suggest that the signage should have flashing amber lights in place during hours of operation such as those used for many years for "School Crossing Patrols" outside schools.
- 20) **Consultation ID:** 6299893 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: Why has this been introduced? Why have you not put a no right turn sign to warn drivers of this new contravention before the road entrance? The sign is obstructed but buses and other road users so you can't read it in time before crossing the line. You can't reverse or U turn onto oncoming traffic as its dangerous. So better waring on the approach would be better. Where does the money go from fines?
- 21) **Consultation ID:** 6300046 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: Having driven up this road for years I object to the closure of this road. Whilst I understand the need for safe streets for children the school in question only omits and receives children at certain times.
- 22) **Consultation ID:** 6300776 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: I don't understand why the council would only section of certain part of Haling Road, this scheme as made the situation worse than what it was before where people think its okay to either park on our drive or across it therefore blocking us. we who lives on this section of Haling Road are unable to move freely,

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This is not acceptable. People taking their children to school then have the cheek to be leaving their cars all day in our parking space.

- 23) **Consultation ID:** 6304304 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: Are PCN the best way to restrict traffic flow during school hours? – Restricting traffic = sure, this makes sense – Charging drivers via PCN = I do not agree this is the correct and fair method. If the council are serious about restricting then perhaps invest in significant warning signage and perhaps temporary barriers that the school can operate to close off.
- 24) **Consultation ID:** 6304646 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: This is absolutely wrong the way Council has introduced these restrictions. Residents were made aware of these changes. If yes, how as we have never received any notification. Loved here for more than 20 years and using these streets and suddenly you find out by receiving penalty notice. Seems like a money grabbing scheme. Need to have proper communication and to get this notice to be withdrawn
- 25) **Consultation ID:** 6304647 **INDETERMINABLE**
School Street/s: Haling Road
Objection/Representation: If these restrictions are to be finalised why council is issuing penalty notices. Issue these penalties when approved. I will need to get my penalty notice to be withdrawn by council at once
- 26) **Consultation ID:** 6304652 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: I have been issued 2 fines for driving down this road, the 1st offence was on the 30th of September and the second time was in the 2nd of October both fines £65. As this is under a 6 month trial period I think it's very unfair to fine anyone for going down this road during this period. Some residents said they were issued warning letters, and others said they received a warning letter after driving down the road. Also I think there should have been more signage at the entrance, maybe bright yellow temporary road signs? I think Croydon Council have overstepped the mark here.
- 27) **Consultation ID:** 6304668 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: This is the only appropriate cut through from Brighton Road to Sussex Road. The loss of this route being one way means you are committed to the route before you see the signs, also this one way route was well developed before anyone inappropriately built a school at this site.
- 28) **Consultation ID:** 6304804 **INDETERMINABLE**
School Street/s: Haling Road
Objection/Representation: This is not obvious by signage to people that are driving and don't know the area.

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- 29) **Consultation ID:** 6305274 **NEUTRAL**
School Street/s: Haling Road
Objection/Representation: I don't have an objection to the scheme per se, what I object to is not receiving notice, as a South Croydon resident, that this was taking place. An email would have alerted me to this and I would not have suffered a fine for entering Haling Road. This is a road which I have driven down numerous times in my 42 years living in South Croydon, but only twice since Covid-19 lockdown (March 2020). Even now I still can't find out the actual times of restricted access I can only see 'morning and afternoon school run', which is not a precise instruction. The article on the Croydon Council site says there is a detailed report and FAQ page but it is not there. I feel it's very unfair to issue a PCN for £130 for a first offence during a trial which only started 1st September, with, as far as I can make out, little or no notice.
- 30) **Consultation ID:** 6305480 **NEUTRAL**
School Street/s: Haling Road
Objection/Representation: I do not have any objections other than these parking restrictions could be emailed to ALL Croydon schools so parents are aware of sudden changes to roads
- 31) **Consultation ID:** 6305598 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: I was extremely annoyed that I received a penalty fine whilst driving home from work on this road. The fact that this is an experimental scheme for a limited time and the fact that it has not been widely publicised makes me feel that Croydon council are running this as a money making scheme to increase funds during covid pandemic which is already a difficult times for its residents. I feel the croydon council are taking advantage of its residents.
- 32) **Consultation ID:** 6305629 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: Inconvenience and this is look like trapping unaware residents to pay money to generate funds. Council services in decline and taxes are already high. If this is experimental scheme they should be issuing warning letters not penalty notices
- 33) **Consultation ID:** 6305649 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: The way in which this scheme was introduced was completely wrong as people within the community were not informed in a clear manner. It was just implemented without any real passing of information to us neighbours and therefore seems like an obvious money grab to catch as many of us out while you can and this is beyond disgusting and needs to be rectified.
- 34) **Consultation ID:** 6305719 **SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: Good scheme to reduce traffic on the road and outside school But there has been appalling signage and a chaotic introduction. Needs a sign on the road surface as the posts are too high for drivers to see Many friends and neighbours were unaware of the new zone and there is no indication or warning except

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the signs high up this resulted in inadvertent fines which seem grossly unfair as the road has previously been used as a cut through legitimately.

- 35) **Consultation ID:** 6305790 **INDETERMINABLE**
School Street/s: Haling Road
Objection/Representation: Why we were not advised of these changes in writing as usual practice in the past 20 years. Can't be selective to send notices to residents and not to get them involved in the consultation process from the very start.
- 36) **Consultation ID:** 6305853 **INDETERMINABLE**
School Street/s: Haling Road
Objection/Representation: Lack of adequate notice and publicity for the scheme which is now penalising people who inadvertently and unwittingly use the roads at the prohibited times. I also can't find on this website the times which apply in Haling Road.
- 37) **Consultation ID:** 6305888 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: No advance warning & totally inadequate signage. People have been using the road for years & none of us knew about this or could see the sign it's so high up & cannot be seen whilst driving.
- 38) **Consultation ID:** 6306015 **INDETERMINABLE**
School Street/s: Haling Road
Objection/Representation: This has always been part of my route home to Birchend Close. The first I heard of the scheme was a penalty notice. I haven't spotted any signage for this change. Any motorist seeing a normal street with cars all up the sides will assume it is a normal street, not a 'pedestrianised zone'.
- 39) **Consultation ID:** 6306143 **SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: I agree with the scheme of limiting traffic near schools, but there needs to be another warning sign earlier on Haling road. As a regular driver on this road since September 2019, I did not notice the signs when turning right onto restricted street as a driver's focus is the road ahead. The first I knew of the changes was receiving a parking charge. So that other drivers who are not from Croydon have advance warning, please install a sign that flashes the car reg with the warning 'Pedestrian zone ahead. So that they can stop and take an alternative route.
- 40) **Consultation ID:** 6306589 **INDETERMINABLE**
School Street/s: Haling Road
Objection/Representation: There should be large, visible warning signs when turning into the area from Brighton Road that you are potentially entering a zone. This is not apparent at the moment.
- 41) **Consultation ID:** 6306843 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: I live up the road from Haling Park Road and always drive up the road in order to get home. Now I have to drive a further distance (with more traffic) to reach home. The signs are extremely badly signed. Not clear at all.

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Should have signs by the petrol station. Also, as primary school teacher myself, I think children should be looking out for traffic as it's a life skill.

- 42) **Consultation ID:** 6306943 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: This is a main route from Brighton Road to Selsdon Road where we live. It is not a fast road as only a short stretch, the problem is not the trough traffic but parents parking illegally. The alternative route through South Croydon is already very congested at school times with streams of children from Whitgift School heading to the station. A longer route via Sanderstead Hill is also very congested due to children coming out of Primary School, with narrow street access it is potential much more hazardous for children than Haling Road and I try to avoid this area at school times.
- 43) **Consultation ID:** 6306976 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: Absolutely pointless, just pushes traffic and difficulties with parking on neighbouring roads.
- 44) **Consultation ID:** 6307097 **INDETERMINABLE**
School Street/s: Haling Road
Objection/Representation: I have received a parking fine, but was totally unaware that this scheme was under way. I did not notice any signs. I feel it is unacceptable to fine someone who knew nothing about the scheme.
- 45) **Consultation ID:** 6307153 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: The school has been built in an area which has difficult safe accessibility. I question why a school was built here in the first place. The scheme displaces cars during school drop off time from Hayling Road to others in the near vicinity causing chaos. Parents walking with children still face the problem of cars but on different roads My main objection is the way fines are being collected from local people who were unaware of the scheme. When you drive round from the garage you have insufficient time to clearly read the sign whilst also keeping your attention on the road. if you wish to make this a car free area area (except for certain vehicles) during certain hours of the day then put in some system that will be visually obvious and I'm confident cars would drive back onto the Brighton Road. At the moment it seems unaware motorists are being caught out and are resentful of the fines being collected.. It is a money generating scheme but the main purpose should be the safety of the pupils without financial gain. The final decision on the scheme is in 2021. If it's a trial why are the fines so large, Why weren't people who live in the this part of the borough properly notified before the trial began. How will we be informed of the results of this consultation? Will we know what the objections were and the councils responses to these objections .Will it be a consultation where the scheme will just continue with no feedback to local people. Please keep me informed via my email.
- 46) **Consultation ID:** 6307308 **INDETERMINABLE**
School Street/s: Haling Road
Objection/Representation: There is no warning sign as you come off the Brighton Rd. The signage is small and easily missed. When you are driving round to turn right

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into Haling Rd, your eyes are watching for traffic coming towards you, turning left into Haling Rd. Once you begin turning into Haling Rd it is impossible to turn around or avoid the route even if you do manage to spot the sign. Croydon Council need to give more more notice of these schemes and warning signs of new changes.

- 47) **Consultation ID:** 6307631 **INDETERMINABLE**
School Street/s: Haling Road
Objection/Representation: What provision can be put in place to ensure that motorists who have regularly used these routes (in some cases for years) are given adequate notice and a chance to find new routes? E.g. Manned enforcement in hi-vis on site in early days/weeks, emails as well as postal notification of PCN warnings for initial month (especially incase motorists have moved house and DVLA have as yet not updated addresses being given to Council
- 48) **Consultation ID:** 6317389 **INDETERMINABLE**
School Street/s: Haling Road
Objection/Representation: The signs are not clear from the main road; and when you turn in to the road you are immediately fined. So you have no opportunity to turn around and avoid the fine -so far I received 2 pcns in first week dropping off my grandson as signs were not clear; my daughter received 3 pcns when dropping off my grandson to Regina ceoli; although we have paid the fines,the signage was not clear
- 49) **Consultation ID:** 6318093 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: I drove down that road on 23/11/2020 completely unaware until I saw a Facebook post this morning that this road is restricted. This is because in my opinion the signage for this road and all the other roads in the scheme are completely inadequate. I live in Shirley and hardly ever use this road, I had no idea there was even a school on it. If this scheme is to reduce traffic and protect children coming in and out of school then there should be more signs and markings on the road so vehicles are clearly aware they are breaking the rules (for example the white hatching boxes). This scheme seems more like a fine trap to make money.
- 50) **Consultation ID:** 6320078 **NEUTRAL**
School Street/s: Haling Road
Objection/Representation: I am a landlord of a property in Haling Road. If I need a workman or myself to access the property during the restricted hours can I get a temporary permit easily? If a work man arrives after say 9.30 but leaves between 2 and 4 will he be fined?
- 51) **Consultation ID:** 6323468 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: The change applied is too sudden and not appropriately administered. There should be prior warning that conditions have changed before approaching the turning. The signs are too small and located in such a way that the driver has to commit to the turning before seeing the notice. The reason is that the turning comes right after a "zig-zag" point in the layout. This means that drivers would have to reverse out of the one way street in order to avoid going up the road. This is pure unadulterated entrapment and feels like a desperate attempt designed to help plug the budget deficit in the council's funds by dubious means. I myself have been

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caught out despite the fact that I have lived in Croydon and used that route for more than 3 decades.

- 52) **Consultation ID:** 6326065 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: I am not sure how this helps traffic in the surrounding areas, this has nothing to do with clean air or to encourage people to walk as raising PCNs after the event does not actually clean the air as you have already driven down the road. The signage needs to be in advance of entering the road and it should be extremely clear so that the driver knows before entering the road not finding out when it's too late.
- 53) **Consultation ID:** 6326074 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: Signs not well positioned. Too high out of view line. Surely the amount of fines issued means the desired effect is not being met. The idea is to stop cars driving in the road... every fine represents a car driving. Success would be no fines. Why such long hours. Why start at 2pm when the school doesn't close till after 3pm? A ban on this road will only send traffic/parking to other roads
- 54) **Consultation ID:** 6328351 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: There is totally inadequate signage for people unaware of this scheme. I've been using these roads for 10 years and have received a fine for using when I saw no signage. Additionally, if this "scheme" is really about schools the scheme should not be going on to 09:30 a.m. Other people need to get to work too and I pay my Council Tax to use maintained roads, not just for kids to use it.
- 55) **Consultation ID:** 6328599 **INDETERMINABLE**
School Street/s: Haling Road
Objection/Representation: Why weren't local residents given more notice to the changes to road usage and signage made clearer? E.g. a letter to local residents? Can I receive a refund for the penalty charge issued to me for driving down this road (a refund due to this poor communication from the council)?
- 56) **Consultation ID:** 6331934 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: This causes all cars to be moved and parents to park illegally and precariously in the roads leading from the main Brighton Road. This causes access issues to Brighton Road due to the nature of parking outside the restricted area. Access to and from Brighton Road is severely affected by the parents relocating the parking of their vehicles to drop off and pick up their children.
- 57) **Consultation ID:** 6337382 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: Inadequate signage. From Selston Road, the signage is not sufficiently visible if the driver is watching the road carefully. Warning notices were not properly sent out as claimed. Penalty notices were often not delivered by Royal Mail on time. Draconian steadfast refusal to waive penalties for any reason, despite

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being in the early days of the scheme. This is truly vicious for hard working people on low incomes and councillors should expect to lose good will and votes

- 58) **Consultation ID:** 6337439 **INDETERMINABLE**
School Street/s: Haling Road
Objection/Representation: Very poor deceitful signage given the layout of the road advance warning sign of restriction ahead just as you enter from Brighton Road needs to be put in place asap.
- 59) **Consultation ID:** 6337561 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: The signage is too late in the turn to enable a motorist to not complete their manoeuvre i.e. by the time you see the restriction you are already in a one way street. This is a revenue making scheme. Whilst it is a consultation experiment no one should be fined, as the local residents haven't had their day. Most local people use "rat runs" extensively and do not care about local school pollution policies. Traffic on main roads is more damaging than flowing cars past schools.
- 60) **Consultation ID:** 6341090 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: You have placed inadequate signage on the south to north approach to the spur meaning that one is committed to turning right before you can see the sign. The sign is obstructed by CCTV sign and then a Telegraph pole. As it's a one-way street you can't even turn round how do you see it at the last minute. However, on the north to south approach there is a very large orange prominent no left turn sign which draws ones eye to it immediately and one is immediately on notice that one cannot turn left into the spur road. Such is the impact that one would drive straight past as a precaution and go back and study the times another time to make sure. Coming from the south travelling north there is no such warning and I'm glad to say that The London tribunal is allowing appeals to motorists caught in this way. The council parking people Anne Harman in particular has been completely disingenuous in this regard stating that the signage is prominent when it is not coming south to north and turning right. This is forcing people to go to appeal or simply to suck up the fine. I don't know where this restriction was advertised but it's certainly wasn't advertised to me and I live very locally.
- 61) **Consultation ID:** 10 Dec 2020 **NOT SUPPORTIVE**
School Street/s: Haling Road
Objection/Representation: Please could I register an objection to the current access/parking restrictions in Haling Road.
Signs make no mention of access for specific days other than Mon- Fri.
As an elderly resident I would like to see this amended to school term dates only (similar to Bromley's approach) and not include Bank Holidays such as Christmas day for example as family will not be able to visit
- 62) **Consultation ID:** 6291783 **NOT SUPPORTIVE**
School Street/s: Keston Avenue
Objection/Representation: This will have a huge impact on the drop off and pick up of my children who attend Keston. I have one in infants and one in juniors meaning I need to stay parked from the earliest point to the latest point. I am also either going to

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or coming from my place of work meaning that I am extremely rushed both ends of the day. This scheme will increase the parking issues that are already present in the school and surrounding roads. Whilst I appreciate the frustrations of residents regarding parking and traffics volumes it's only for two very short periods of the day and feel that there must be an alternative solution to ease these frustrations and clamp down on inconsiderate parking rather than just making it very difficult and unpleasant for parents who have no choice but to drive to school. As a working parent I should be able to arrive at school without the added stress of being late to drop off or collect my child due to parking such a distance from the school.

63)**Consultation ID:** 6304581

NOT SUPPORTIVE

School Street/s: Keston Avenue

Objection/Representation: This scheme has caused chaos to Court Avenue residents. Keston Avenue purchased their properties with full knowledge there would be school traffic - Court Avenue did not yet are suffering consequences of this scheme. The traffic flow has increased dramatically with everyone using it as a cut through to avoid Keston at all times not just school times now. There are many people dangerously driving and speeding around the corner. I have almost knocked children over on several occasions who run along Court Avenue without stopping or looking at drives or cars coming out. I have a dividing hedge between my property and cannot see around the hedge only in front of me. I have urged the school to advise parents not to let the children run obliviously down the road for their own safety. I have encountered rude gestures and abusive drivers when trying to leave my drive as have workman visiting my property. Court Avenue becomes gridlocked during school time especially. At least 3 cars this week alone have been hit by the traffic trying to pass each other to get down Court Avenue, the pollution has increased and quality of quiet life has decreased. I have to move my car off the drive and park on the road if I plan to go to ensure I'm not blocked in. I don't always know when I'm going out and don't think it's fair when I have paid for a dropped kerb and have a drive as encouraged by the council. I already have to tolerate the extreme noise of the school, at play times, lunch times and outdoor sport and after school club - where the children are allowed to scream. I believe Court Avenue needs to be a No Through Road into Keston Avenue and a No Entry in to Court Avenue from Keston Avenue to restore the quality of life we in Court Avenue once had.

64)**Consultation ID:** 6304627

NOT SUPPORTIVE

School Street/s: Keston Avenue

Objection/Representation: I object to this scheme as it has made Court Avenue a rat run for speeding drivers. This has resulted in several accidents in the last 2 weeks alone. This narrow road with cars parked on each side cannot support this weight of traffic and it's only a matter of time before a child leaving the school is hurt. Surely the whole idea is to protect children. Would it not be better to close the road at the junction of The Glade and Keaton Avenue?

65)**Consultation ID:** 6304941

NOT SUPPORTIVE

School Street/s: Keston Avenue

Objection/Representation: I am a resident of Court Avenue. Court Avenue is now being used as a cut through for traffic as a result of the restrictions in Keston Avenue. Cars are not adhering to the 20mph speed limit and some drivers are driving in excess of the 20mph speed limit with little or no care/respect for the residents. My car was

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badly damaged at around 9am on Tuesday 6 October whilst parked in the road. Nobody owned up to the accident and strangely no witnesses either but I suspect this was as a result of stubborn drivers not prepared to give way to ongoing traffic. The road is busy enough with school traffic without the added restrictions to Keston Avenue. Cars are parking over our driveways and have no respect for the residents. Trying to get my grandchildren in the car to take them to pre-school is a nightmare because the traffic is so bad. I strongly oppose this scheme being implemented permanently.

- 66) **Consultation ID:** 6305453 **NOT SUPPORTIVE**
School Street/s: Keston Avenue
Objection/Representation: This is putting the traffic problem into Court Avenue which is now becoming a rat run. In an already busy road which has a Doctors surgery under normal circumstances being open plus the parking from Keston School this is making it a very dangerous road for all concerned . I feel with the extra traffic it's only a matter of time till this results in injury or worse a death . Maybe the people who decide these rules would like to live in the road for a week to fully understand the concerns of us living here.
- 67) **Consultation ID:** 6305517 **NOT SUPPORTIVE**
School Street/s: Keston Avenue
Objection/Representation: I strongly object to this scheme as it's caused an horrendous problem for the residents of Court Avenue who overwhelmingly voted against it in the first place. We are seeing our road used as a cut through rat run with many parents parking across drives and walking around the corner to the school, We also have an entrance in Court Avenue that is used by many more parents than just reception. On a daily basis we have gridlock either end of our road and to date since the scheme went live we've had four cars damaged due to cars pulling in and out in tight spots to give way to on coming traffic! We have been requesting for months the council help but sadly unless someone is killed or seriously injured they won't do nothing!
- 68) **Consultation ID:** 6305525 **NOT SUPPORTIVE**
School Street/s: Keston Avenue
Objection/Representation: The problems it has caused Court Avenue is unbearable and it's 24/7 seven days a week as drivers use our once beautiful road into a rat run.
- 69) **Consultation ID:** 6305526 **NOT SUPPORTIVE**
School Street/s: Keston Avenue
Objection/Representation: As an elderly person of 87, it's become a rat run through Court Ave, and extremely difficult to cross the road with my walker.
- 70) **Consultation ID:** 6305792 **NOT SUPPORTIVE**
School Street/s: Keston Avenue
Objection/Representation: I am concerned about the amount of traffic coming off Coulsdon Road into Court Avenue and certainly not doing 20 mph, we also get a lot of children crossing this end of the road, and with cars parked from the surgery, station parking and people parking their cars from Coulsdon Road and above the shops there is an accident waiting to happen. Some mornings the traffic is queuing back to Tudor Close to get out of Court Avenue, and when the surgery is back to normal it will be

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even worse, also the parking on the double yellow lines at the entrance to Court Avenue doesn't help the situation. I heard that "somebody" said that there wasn't an entrance to the school in Court Avenue, well I have lived here for 49 years and I can assure you there is and is being used, not just because of Covid 19 as "somebody" has stated. Court Avenue is also used as a rat run with people speeding.

- 71) **Consultation ID:** 6306366 **NOT SUPPORTIVE**
School Street/s: Keston Avenue
Objection/Representation: I live on Court Avenue. The school scheme and road works on Coulsdon Road has resulted in Court Avenue becoming a very dangerous road. A huge amount of traffic and often speedy. Someone will be knocked over before long. The parents of the children at Keston School use Court Avenue for parking which I understand but it is now a hazard.
- 72) **Consultation ID:** 6306515 **NOT SUPPORTIVE**
School Street/s: Keston Avenue
Objection/Representation: No mention of the reception class entrance (REDACTED TEXT TO PRESERVE PRIVACY) in Court ave where we have to endure vehicles, diesels in particular with their engines idling to keep warm in winter and cool in summer while they sit and text on their phones, so much for lower pollution! when any of us ask them to un block our driveways we often receive a mouth full of abuse. Our road is now total chaos in school times thanks to the Keston ave. closure resulting in a speeding rat run and increased parking in Court ave as I write this three of my neighbours cars have been damaged I am sure this will make no difference to your decision, this cash generating scheme will go ahead anyway.
- 73) **Consultation ID:** 6317676 **INDETERMINABLE**
School Street/s: Keston Avenue
Objection/Representation: Please put clear easy to read signage that can be seen straight away. It will cause an accident trying to read it ! It is not fair to be given a fine with such insignificant signage if you have not been made aware of the new road closure
- 74) **Consultation ID:** 6319110 **SUPPORTIVE**
School Street/s: Keston Avenue
Objection/Representation: I firmly believe the scheme is a success and should be made permanent. The principal reason for this is the huge increase to the safety of the children. Prior to the scheme being introduced, the length of Keston Avenue near the entrance to the school was parked up on both sides with cars, including across driveways. This had the effect of creating a long 'tunnel' which cars had to drive along very quickly in order to not get stuck in the middle with a car coming the other way up the tunnel (although getting stuck and blocking the road and holding up the 404 bus happened regularly). Children were of course trying to cross the tunnel of fast moving cars and it was so very dangerous. It's now wonderful to see the children so relaxed and happy on their way into school, even walking in groups along the middle of the road chatting to each other as there are now no cars. The scheme is also a success from an environmental point of view. I have never seen so many children walking or using bikes and scooters to get to school - even parents are on scooters which is great. I don't see any material downside to the scheme continuing - I understand that cars may need to take a different route during some parts of the day, but to be honest, for

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the reasons mentioned above any sensible local resident would have already avoided this road during school start/finish time. Having seen how successful the scheme is I think that soon this will be the norm for all streets near school entrances. Congratulations on being one of the pioneers of this scheme and long may it continue.

- 75) **Consultation ID:** 6320199 **INDETERMINABLE**
School Street/s: Keston Avenue
Objection/Representation: Residents of other authorities are unaware of scheme.
- 76) **Consultation ID:** 6328877 **NOT SUPPORTIVE**
School Street/s: Keston Avenue
Objection/Representation: For residents travelling regularly through those roads have to take an alternate route which is congested or longer Why can't you enforce no parking in that zone except for residents vehicle at that specific hours and allow the passage of traffic freely at all times. What about the PCN issued in the experimental times can we reclaim the amount paid ?
- 77) **Consultation ID:** 6331933 **NOT SUPPORTIVE**
School Street/s: Keston Avenue
Objection/Representation: We object to the Keston Avenue school street scheme. Last term, with the new restrictions in place, many more parents parked right along Court Avenue making it extremely hazardous to navigate. They park across people's drives, ignoring the white line road markings and giving oncoming traffic no where to pull in. Cars have been hit, drivers get abusive if you try to pull into your own drive, whilst others continue to ignore the speed limit. Given that Court Avenue has the 'Nursery' entrance, with very young children coming out, this is about the worse scenario. In fact that entrance should have its own yellow zigzag lines for their safety and speed bumps along the avenue would help stop so many drivers ignoring the 20mph limit. The area of Keston Avenue beyond the proposed restricted zone has a very steep hill and as cars back up on the hill it makes the junction with Court Ave even more dangerous. Children are crossing there with frustrated drivers who give them no right of way. Parents often park on the double yellow lines at this junction making it even more hazardous. To then add even more vehicles to this including those frustrated drivers/delivery people trying to get beyond Court Ave, it just does not make any sense to restrict the access to Keston Avenue. Better ideas would be extending the yellow zig zag lines outside of the Keston Ave school entrance further up the street maybe to the lamppost labelled 002 or the tree to the west of it. A traffic camera could be installed to stop drivers using the yellow zigzags as a drop off zone. Or make a part of the school side of the street a drop off and pick up 'No Waiting' area, further away from the entrance, so children who can walk in without their parents can be safely left there. In addition, the proposed timings for the restricted zone would be far too long as school does not start until 8.55am and finishes at 3pm for Infants and 3.15pm for Juniors. 8.30 – 9.15am and 2.30 – 3.30pm would be more suitable
- 78) **Consultation ID:** 6315931 **NOT SUPPORTIVE**
School Street/s: Montpelier Road
Objection/Representation: I live on Montpelier Road but on the section just next to the school zone. I have been told I can't have a permit, despite the fact the part of the road I live on has now been made into a one way street. This means when I have to drive to work (via Brighton road) I have to take a significant detour which at rush hour

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adds approximately 10-20 minutes into my journey. I can't understand the reason to not allow all Montpelier Road residents to apply for a permit, especially as we have had to endure 3 years of Brick By Brick disruption..!!!

- 79) **Consultation ID:** 6 Oct 2020 **NOT SUPPORTIVE**
School Street/s: Montpelier Road
Objection/Representation: Please be advised all this traffic control measure has done is redirected the traffic to Purley Park Road.
As a resident of [REDACTED] (REDACTED TEXT TO PRESERVE PRIVACY) Purley Park Road I strongly object as I have been blocked in on my drive by the parents vehicles on 2 occasions already. There are no Traffic warden patrols on our road on a regular basis it seems very ad
So please take this email as a formal objection to the scheme unless traffic control measures are introduced on Purley Park Road.
- 80) **Consultation ID:** 6307948 **INDETERMINABLE**
School Street/s: Dickenson's Lane
Objection/Representation: The parking exemption permits are not available. Accessing them online is not specific. Does not appear on the online map of parking restrictions in croydon. Sign for restrictions halfway down street. Signage unclear/misleading. I have complained before and was ignored. Building work on alternative route means I have to drive through restrictions.
- 81) **Consultation ID:** 6306336 **INDETERMINABLE**
School Street/s: Thomson Crescent & Chapman Road
Objection/Representation: Live within the street limitation. frequently required to take my elderly parents to early morning hospital appointment. Residents should not be charged to leave their own homes. Those effected should receive free yearly permits if kept in place .
- 82) **Consultation ID:** 6306382 **INDETERMINABLE**
School Street/s: Thomson Crescent & Chapman Road
Objection/Representation: I am self -employed going and leaving my house any time. The house owners should not be put in a disadvantage position the patent of the children should be disallowed to park close to the school Apart from the period stated , the road is free This is fair on us
- 83) **Consultation ID:** 6306509 **INDETERMINABLE**
School Street/s: Thomson Crescent & Chapman Road
Objection/Representation: 1.We have 3 cars in our family and the cost is going to be high 2.The traffic is low 3. It is quiet And peaceful Road
- 84) **Consultation ID:** 6312700 **INDETERMINABLE**
School Street/s: Thomson Crescent & Chapman Road
Objection/Representation: live in Thomson crescent and have not been given a permit and have in error have driven into this road twice this week ,if I recieve a fine it will cause me extreme financial difficulties.

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- 85) **Consultation ID:** 6315144 **NOT SUPPORTIVE**
School Street/s: Thomson Crescent & Chapman Road
Objection/Representation: It's just catching poor parents who drops off their children in school and go for other errands. Personally, I am a working mother of two who sometimes have challenges in childcare, I sometimes leave early from work , come home to pick up my children and go to school with them, it is so hard for me to walk with them all the times considering the distance to school from my house. It is so difficult for most workin parents like me because I can't even pass through the school to drop off. If you had imposed drop off areas that could have been better than catching up people/drivers like that.
- 86) **Consultation ID:** 6339298 **SUPPORTIVE**
School Street/s: Marston Way Woodend
Objection/Representation: No objections. It's a great idea.
- 87) **Consultation ID:** 6338656 **NOT SUPPORTIVE**
School Street/s: Marston Way Oakley Road & Sandown Road
Objection/Representation:
Marston Way - I am a mental health social worker and received a ticket on this road. I feel the signs need to be placed before you get to the turning. The road that you turn off is busy and often has lots of parked cars. It is impossible to turn back if you are not aware of the rules.

Oakley road - I live in the road parallel and have found our road busier in the mornings and at pick up time. So it's just moving the problem along. I also think the times are too long and I now have to completely avoid this road for fear of getting the time wrong and getting a fine. Ultimately this is a money making scheme for the council. I think it's disgusting that residents are being used to drum up funds after years of bad management from the leaders of the council.
- 88) **Consultation ID:** 6306928 **NOT SUPPORTIVE**
School Street/s: Oakley Road & Sandown Road Southcote Road
Objection/Representation: Fears that this will extend to others schools making it nigh on impossible to park or travel.
- 89) **Consultation ID:** 6300980 **NOT SUPPORTIVE**
School Street/s: Southcote Road Haling Road
Objection/Representation: I think it is causing more traffic on Ridgeway Road rather than getting people to walk to school. Because the Ridgeway is double parked only allowing one car at a time to drive down. Please send someone down in the morning to see the madness.
- 90) **Consultation ID:** 6304624 **SUPPORTIVE**
School Street/s: Southcote Road Haling Road
Objection/Representation: I fully support the scheme but publicity has been poor. We have lived in the area for over 20 years - including living in the next road to Haling Road. My wife was not aware and drove up the road - the signs are not clear enough during busy time. We only received a warning - a sensible approach - but would be good to make those who live locally more aware not just those in the immediate area.

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But I think this a great idea and fully support it having had 2 children at Ridgeway school..

- 91) **Consultation ID:** 6305626 **NOT SUPPORTIVE**
School Street/s: Southcote Road Haling Road
Objection/Representation: Absolutely disgraceful money making scheme in place to off-set the £1.5 billion debt Croydon council has accumulated. It is not for the school children or for the parents as the statistics do not show increased injuries during these times. Having a 1.5 hour and 2 hour penalty for going down public access streets is a new low for the council. Scrap the idea!.
- 92) **Consultation ID:** 6306968 **SUPPORTIVE**
School Street/s: Southcote Road Haling Road
Objection/Representation: I am broadly in favour of the scheme but feel it has been poorly communicated to people who potentially live in the restricted zones but not close by. I now have a penalty notice for the Haling Road route which had I been alerted would not have entered. The sign was poorly placed too close to the restriction and gave inadequate warning before I was on a one way street unable to avoid the camera. I will pay the £65 but feel that you should contact me and treat this as a formal complaint and reimburse me.
- 93) **Consultation ID:** 6326002 **NOT SUPPORTIVE**
School Street/s: Southcote Road Haling Road
Objection/Representation: The signs are extremely unclear, which I believe is purposely done to ensure more drivers are caught and fined- if the purpose is to improve safety and air quality near schools, then this is not being achieved if drivers are still driving down the roads because of unclear road signs. Drivers are very clear about not going down a road with a no entry sign, though they are not aware of a white sign that is not commonly used. These should be replaced with a very clear, brighter sign.
- 94) **Consultation ID:** 6330249 **INDETERMINABLE**
School Street/s: Southcote Road Haling Road
Objection/Representation: The announcement about the introduction of these schools streets is poor. The signs are at junctions on narrow roads, above the drivers' sight lines, so a driver turning in to the road is not likely to see the signs. The should be advanced warning signs and markings on roads and/or altered road surface to alert drivers to the restriction. The advanced warning sign for Haling Road should be at the the junction with Brighton Road as the substantial majority of vehicles turning into this road intend to use the restricted area, which is not visible from the junction.
- 95) **Consultation ID:** 6340563 **SUPPORTIVE**
School Street/s: Southcote Road Haling Road
Objection/Representation: I think it is causing more traffic on Ridgeway Road rather than getting people to walk to school. Because the Ridgeway is double parked only allowing one car at a time to drive down. Please send someone down in the morning to see the madn 1. I am strongly in favour of these schemes. My children attend Ridgeway School and the Southcote Road scheme has made a significant improvement to road safety. 2. In order to better balance the benefits of the scheme against the inconvenience it causes to local residents, I would favour a reduction in

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the hours of operation of the Southcote Road scheme to 8.15-9.15 am and 2.30-3.30 pm. 3. It is essential that road signs relating to the schemes are adequate and fair to drivers. The signage for the Southcote Road scheme is satisfactory, but the signage for the Haling Road scheme is wholly inadequate. There should be clear warning signs at both entrances to Haling Road from Brighton Road, instead of signs only being at the entrance to the limb of Haling Road on which the school is located. The signs should also be at a position, angle and height which is within drivers' line of sight. The hundreds of fines which have been issued in relation to this scheme show that something is badly wrong, and in my opinion those fines are all unlawful and liable to be quashed by a court or tribunal by reason of the inadequate signage.

- 96) **Consultation ID:** 6342155 **SUPPORTIVE**
School Street/s: Haling Road Keston Avenue
Objection/Representation: No objections - excellent schemes. Care must be taken to ensure signage is clear..
- 97) **Consultation ID:** 6300255 **NOT SUPPORTIVE**
School Street/s: Haling Road Montpelier Road
Objection/Representation: This are major Roads that join into other Roads and also pickup time can be very stressful with no where to park the vehicle to get to the School.
- 98) **Consultation ID:** 6337581 **NEUTRAL**
School Street/s: Haling Road Montpelier Road
Objection/Representation: Signage is inconsistent on all proposed roads and whilst adhere to MINIMUM requirements on some roads. Not on all. Also, to confirm this is not a money making scheme to fleece unexpected drivers i propose that all drivers that violate the rule get a warning in the first instance.
- 99) **Consultation ID:** 6303545 **INDETERMINABLE**
School Street/s: Dickenson's Lane Woodend
Objection/Representation: Can a map showing roads be included.
Officer Response
This was provided via email on 22 January 2022.
- 100) **Consultation ID:** 6317510 **NOT SUPPORTIVE**
School Street/s: Southcote Road Keston Avenue Montpelier Road
Objection/Representation: These are popular roads to drive along and the signage is totally inadequate considering the penalties imposed. All roads should be available for all users at all times
- 101) **Consultation ID:** 6306836 **NOT SUPPORTIVE**
School Street/s: Southcote Road Haling Road Keston Avenue
Montpelier Road
Objection/Representation: I don't support these road closures as just pushes the extra traffic and parking one street further away. It is causing dangerous parking and gridlock on the ridgeway and Brighton road. It's also dangerous because young kids have to walk further to get collected, possibly unaccompanied, so have a higher risk of accidents, especially as those driving are having to navigate the extra traffic nearby. The signposting could be clearer. It is very easy to miss the signs with the timing you

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aren't allowed to drive down. In fact the ones on southcote have only just been put up, yet I know of people receiving letters for having driven down there despite there not being anything saying you couldn't until very recently.

Consultation ID: 6306839

School Street/s: Southcote Road Haling Road Keston Avenue
Montpelier Road

This is a repeat of consultation ID 6306836 and made by the same individual just a few minutes apart. Likely to have occurred as maybe individual wasn't sure if the previous one had actually submitted.

102) **Consultation ID:** 6306973 **NOT SUPPORTIVE**

School Street/s: Southcote Road Haling Road Keston Avenue
Montpelier Road

Objection/Representation: As a resident in the area I have friends and family living on these roads which I visit I don't what I should be penalised for this?

103) **Consultation ID:** 6306827 **NOT SUPPORTIVE**

School Street/s: Oakley Road & Sandown Road Southcote Road
Haling Road Montpelier Road
Thomson Crescent & Chapman Road

Objection/Representation: The roads around get gridlocked. The parents just park in the nearby streets and then are parked for longer. They do not walk instead of driving. The pollution with the grid lock is terrible.

104) **Consultation ID:** 6306829 **NOT SUPPORTIVE**

School Street/s: Oakley Road & Sandown Road Southcote Road
Haling Road Keston Avenue Montpelier Road
Thomson Crescent & Chapman Road

Objection/Representation: Just moving the problem to the next roads - causing greater frustration/pollution and danger to the children and residents. Lack of clear signage - drivers need warning before they arrive at the end of the road with too many things to read quickly and safely - leading to confusion and people turning around (causing more pollution and danger).

105) **Consultation ID:** 6338882 **SUPPORTIVE**

School Street/s: Marston Way Oakley Road & Sandown Road
Southcote Road Haling Road Keston Avenue
Montpelier Road Dickenson's Lane Woodend
Thomson Crescent & Chapman Road

Objection/Representation: Reason for excluding Disabled/Blue Badge Holder including potentially those potentially driving someone to schools or attending schools did not appear to have been carefully considered. This should have been clearer on paper and consultation (i.e. FAQ) and exemption including process for permit and criteria should be clarified rather than appearing arbitrary or more at the mercy of the council. Given these are multiple changes, you would have also expected that the council will include provisions for few months of warning notice to driver who may accidentally miss these warning rather than applying it immediately all after simple

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online consultation which given the pandemic would undoubtedly be less effective. Else this scheme could be misconstrued as mere money making scheme rather than one for the good benefit of schools & residents within the area..

- 106) **Consultation ID:** 6299836 **NOT SUPPORTIVE**
School Street/s: Marston Way Oakley Road & Sandown Road
 Southcote Road Haling Road
 Atlee Close Keston Avenue Montpelier Road
 Dickenson's Lane Woodend
 Thomson Crescent & Chapman Road

Objection/Representation: These schemes cause a ridiculous amount of traffic all day on the surrounding major roads, making it impossible to go anywhere. The signage and rules regarding access as a non resident are not clear and on roads such as Auckland Road I have been unable to collect an elderly relative for church fearing a fine as I can not get outside her home.

- 107) **Consultation ID:** 6299881 **NOT SUPPORTIVE**
School Street/s: Marston Way Oakley Road & Sandown Road
 Southcote Road Haling Road
 Atlee Close Keston Avenue Montpelier Road
 Dickenson's Lane Woodend
 Thomson Crescent & Chapman Road

Objection/Representation: I live next to a schools Street school. All the scheme does is displace traffic to surrounding roads, with parents parking illegally or dangerously in surrounding roads (ie on main main road with central double white line, across drive ways etc). It makes surrounding roads untraceable during peak times. There has been no monitoring or policing and as the roads are not next to the school, it is out of sight, out of mind. This scheme does not improve pupil safety: parents Park dangerously and pupils have to cross more roads with far more traffic (due to displacement). Given covid restrictions there is the added dangers due to large groups of parents congregating. Every week the school sends out reminders to be considerate because residents have complained, yet they say the scheme is a success and never actually do anything to police the problem. It is misery for local residents outside the schemes (the capacity for parking close to the school needs to utilised to 'share the load'.

- 108) **Consultation ID:** 6300344 **NEUTRAL**
School Street/s: Marston Way Oakley Road & Sandown Road
 Southcote Road Haling Road
 Atlee Close Keston Avenue
 Montpelier Road Dickenson's Lane Woodend
 Thomson Crescent & Chapman Road

Objection/Representation: I have less issue with the scheme itself what I have an issue with is the lack of signage! There is no signage at the ends of the road to advise people not to drive down it - it feels like a scheme to make money!!

- 109) **Consultation ID:** 6301363 **SUPPORTIVE**
School Street/s: Marston Way Oakley Road & Sandown Road
 Southcote Road Haling Road
 Atlee Close Keston Avenue

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Montpelier Road Dickenson's Lane Woodend
 Thomson Crescent & Chapman Road

Objection/Representation: My comments apply to all schemes. I think school streets are a good idea but the implementation is unfair. I believe that VERY MANY drivers will miss the signs and will receive penalty notices. Whilst those of us that are better off will be just angry for poorer members of the community these fines could be personally devastating. I looked at Haling Road and I know I could easily have missed the signs.

110) **Consultation ID:** 6303546 **NOT SUPPORTIVE**
School Street/s:

Marston Way Oakley Road & Sandown Road
 Southcote Road Haling Road
 Atlee Close Keston Avenue
 Montpelier Road Dickenson's Lane Woodend
 Thomson Crescent & Chapman Road

Objection/Representation: Yet another money making scheme for Croydon council. The corrupt council using motorists to recoup money they have squandered. As a taxi driver the job is getting ridiculous on the surrounding road.

111) **Consultation ID:** 6303677 **NOT SUPPORTIVE**
School Street/s:

Marston Way Oakley Road & Sandown Road
 Southcote Road Haling Road
 Atlee Close Keston Avenue
 Montpelier Road Dickenson's Lane Woodend
 Thomson Crescent & Chapman Road

Objection/Representation: This has not been adequately advertised, it is unclear what time these restrictions are as school times vary. Apparently there are 'signs', but I've seen none. It would be helpful if the roads were physically closed during these times with a sign in the middle of the road to ensure that individuals become more aware of this and prevent innocent, unaware individuals from being fined

112) **Consultation ID:** 6303766 **NOT SUPPORTIVE**
School Street/s:

Marston Way Oakley Road & Sandown Road
 Southcote Road Haling Road
 Atlee Close Keston Avenue Montpelier Road
 Dickenson's Lane Woodend
 Thomson Crescent & Chapman Road

Objection/Representation: The school Street schemes simply do not work. We live next to a school Street scheme and it has been an absolute misery. Traffic has simply been displaced to other local roads (out of sight, out of mind). which have seen traffic problems rise dramatically. (every week the school newsletter features complaints from local residents outside TGE scheme - but nothing is done to solve the additional traffic problems it is causing in surrounding roads. In addition parents often using more dangerous drop off points (such as main roads), negating most of the safety aspect.

113) **Consultation ID:** 6303846 **NOT SUPPORTIVE**
School Street/s:

Marston Way Oakley Road & Sandown Road
 Southcote Road Haling Road
 Atlee Close Keston Avenue Montpelier Road

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Dickenson's Lane Woodend
Thomson Crescent & Chapman Road

Objection/Representation: Too many restrictions on the roads, 20 mph, speed humps, one way streets, bus lanes, cycle lanes, tram routes etc.

114) **Consultation ID:** 6305326 **SUPPORTIVE**

School Street/s: Marston Way Oakley Road & Sandown Road
Southcote Road Haling Road
Atlee Close Keston Avenue Montpelier Road
Dickenson's Lane Woodend
Thomson Crescent & Chapman Road

Objection/Representation: The School Streets programme is a fantastic way to cut pollution in the vicinity of vulnerable young lung; encouraging a modal shift - essential element of carbon reduction; education children and their parents about the need to consider the environmental implications of their lifestyles; supporting healthy activity and enabling biodiversity to get more of a foothold.

115) **Consultation ID:** 6306037 **NOT SUPPORTIVE**

School Street/s: Marston Way Oakley Road & Sandown Road
Southcote Road Haling Road
Atlee Close Keston Avenue Montpelier Road
Dickenson's Lane Woodend
Thomson Crescent & Chapman Road

Objection/Representation: The pandemic has left council coffers short as the governments spend what you like, we have got this covered promise was not as you thought. But this is purely a cash generator, if you want it to be about covid distancing you should only be punishing the parents who would generally be clogging up the roads at pick up times not the unsuspecting motorist navigating around the borough. You could have one of your leigions of wardens enforcing the TRAFFIC in the road.

116) **Consultation ID:** 6314529 **NOT SUPPORTIVE**

School Street/s: Marston Way Oakley Road & Sandown Road
Southcote Road Haling Road
Atlee Close Keston Avenue Montpelier Road
Dickenson's Lane Woodend
Thomson Crescent & Chapman Road

Objection/Representation: It's unfair and unjustified, car users pay road tax and we should be allowed to drive on the roads freely . You are just trying to make money to fill your banks to pay off debts, yet you happily charge high council tax. Labour OUT! Also try enforcing the low speed limit you introduced but never enforced pampsiford road, people always speed and drive more than 20MPH!

117) **Consultation ID:** 6325861 **NOT SUPPORTIVE**

School Street/s: Marston Way Oakley Road & Sandown Road
Southcote Road Haling Road
Atlee Close Keston Avenue Montpelier Road
Dickenson's Lane Woodend
Thomson Crescent & Chapman Road

Objection/Representation: Public road Outrageous fining Signs not clear - too high - no notice before turn to road particularly Haling road

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118) **Consultation ID:** 6325920 **NOT SUPPORTIVE**
School Street/s:

Marston Way	Oakley Road & Sandown Road	
Southcote Road	Haling Road	
Atlee Close	Keston Avenue	Montpelier Road
Dickenson's Lane	Woodend	
Thomson Crescent & Chapman Road		

Objection/Representation: I think this is ridiculous , I have had a fine already as was not aware of this scheme I've had many friends also been fined , it is an utter joke ... roads that we have been going up for years have had these cameras put up in a flash and stupid signs that are not appropriate for people who have been driving on these roads for years , one of the signs on Thompson crescent isn't even lit up ... the bulb on the sign obviously does not work, hopefully who ever dreamed up this hair brained scheme will come to there senses and scrap it ... I like thousands of others are extremely angry as it seems the councils will stop at nothing to take money from people by any means possible ... !!! And the amount of near on accidents I've seen because people stop dead to read the sign before going up the road is unbelievable, drivers are now petrified of accidentally driving up one of these roads and are paying more attention to reading these stupid signs than concentrating on the road itself ... seriously if the councils concern is the safety of children then block these roads of totally ... but that won't happen because it's not about the safety of the children it's about getting money out of the drivers ... absolute shambles.

119) **Consultation ID:** 6326053 **SUPPORTIVE**
School Street/s:

Marston Way	Oakley Road & Sandown Road	
Southcote Road	Haling Road	
Atlee Close	Keston Avenue	Montpelier Road
Dickenson's Lane	Woodend	
Thomson Crescent & Chapman Road		

Objection/Representation: I agree with the scheme which has great benefits but the hours are too long and should be limited to school opening and closing hours only. Anything outside of those hours is unnecessary and actually has no rationale backing it, it's a clear aim to fine drivers for no reason. Other nearby boroughs have shorter hours, so please align with them. Please also make the signs more obvious, especially at nearby junctions. Lots of drivers unfairly get fined because of these unclear signs, and can't turn around in time. Thanks.

120) **Consultation ID:** 6326105 **NOT SUPPORTIVE**
School Street/s:

Marston Way	Oakley Road & Sandown Road	
Southcote Road	Haling Road	
Atlee Close	Keston Avenue	Montpelier Road
Dickenson's Lane	Woodend	
Thomson Crescent & Chapman Road		

Objection/Representation: I understand the scheme is about improving safety and air pollution. However, what is the statistic of pupils getting hurt by cars on these streets? Has the research been done and does the result back up the need of imposing these rules? If not, what data are you basing on? There are inefficient signages on the road to these restriction. By the time the drivers see it, read it and digest it, they would have entered the road already. It is not surprising that most residents feel like this is a

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money grabbing scheme from the bankrupted council! If the council wish to improve safety, rising bollards can easily do the job.

- 121) **Consultation ID:** 6326136 **NOT SUPPORTIVE**
School Street/s: Marston Way Oakley Road & Sandown Road
Southcote Road Haling Road
Atlee Close Keston Avenue Montpelier Road
Dickenson's Lane Woodend
Thomson Crescent & Chapman Road

Objection/Representation: All these roads drive traffic onto main roads which cause more congestion at school times but lanes still empty 90% of time open all but lanes to release good flow of traffic etc.

- 122) **Consultation ID:** 6337558 **NOT SUPPORTIVE**
School Street/s: Marston Way Oakley Road & Sandown Road
Southcote Road Haling Road
Atlee Close Keston Avenue Montpelier Road
Dickenson's Lane Woodend
Thomson Crescent & Chapman Road

Objection/Representation: I don't consider that the sighting of a school in a street warrants its closure to through traffic. Additionally the signage is not obvious enough - in Haling Rd in particular you are into the one way street before you see a sign (if you are looking for it) that says what hours the road is inaccessible- a) you can't get out of the street b) you cannot fully read the sign and check your watch or dash clock in the time available before you get rear ended.

- 123) **Consultation ID:** 6343399 **SUPPORTIVE**
School Street/s: Marston Way Oakley Road & Sandown Road
Southcote Road Haling Road
Atlee Close Keston Avenue Montpelier Road
Dickenson's Lane Woodend
Thomson Crescent & Chapman Road

Objection/Representation: I support these new school streets.
Marston way

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Data Protection Impact Assessment (DPIA)

Project Name:	School Streets
Project Manager or Sponsor (PM):	Tabrez Hussain / Jayne Rusbatch
Name of person completing the DPIA if different to (PM):	
Service Team and Department:	Highways & Parking Services Sustainable Communities
Relevant Director and Executive Director:	Steve Iles Sarah Hayward
Information Management Champion(s) for service area:	
Date DPIA received by the IMT:	
Date comments provided by DPO:	11 March 2022
Date approved by IMT :	

1 Project Scope

You should describe here the nature, scope, context and purpose of the processed processing. (Include the projects aims, potential impact, all individuals involved in the project and those that may be affected by it. The stakeholders should be as broad as possible so that the list can be edited down after consultation. You should summarise why you identified the need for a DPIA).

The need for a DPIA has been identified as the project will involve public statutory consultation and the collection of their responses to the statutory consultation. This requires the below DPIA.

Once the project is up and running the project will involve collection, processing and retention of Vehicle Registration Marks (VRM) for the purposes of enforcement. The DPIAs for these activities has been carried out by the Parking Enforcement Team as a separate exercise.

The project aims are as follows:

- To address concerns around road safety outside school gates
- To address concerns around pollution and idling vehicles outside school gates
- To encourage the use of active sustainable transport modes when travelling to and from school
- To support Croydon's Transport objectives and more widely the London Mayor's Transport Strategy

The potential impacts of this project are as above together with minimal negative impact such as displacement of traffic, parking and minimal impacts on access for delivery vehicles, visitors etc during scheme operational hours.

The following are key stakeholders:

- The public/residents
- The Schools
- Businesses
- Local councillors
- Emergency Services
- Service Delivery vehicles

2 Data Description

Answer the questions below so that there is a clear understanding about how the information will be used, who will use it etc. Remember that it's personal information (i.e. information about individuals) that you need to be concerned with. If you do not have answers to all the questions at this time, simply record what you do know.

<p>Whose information is being used?</p> <ul style="list-style-type: none"> Are there additional concerns that need to be considered due to individuals sensitive/ complex circumstances? i.e. vulnerable person 	<p>We will be processing information provided by those people responding to the statutory consultation. The statutory consultation is voluntary and where participants take part they will be required to provide some personal information.</p> <p>Also Registered keepers information for vehicles for the processing of Penalty Charge Notices for those vehicles contravening the School Streets.</p>
<p>What information is being used?</p> <ul style="list-style-type: none"> Consider the nature of this information E.g. Child's social care file 	<p>Information being used for statutory consultation includes:</p> <ul style="list-style-type: none"> Address Name Email address <p>Personal Data Which May be used by the Council in order to issue and process Penalty Charge Notices and also provide services to customers</p> <ul style="list-style-type: none"> Vehicle Registration Mark, captured by camera and Civil Enforcement Officer, in order to identify a vehicle committing a contravention and used in order to obtain Keeper details. Registered Keeper details provided by the DVLA, in response to a KADOE (Keeper at Date of Offence Enquiry).

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	<ul style="list-style-type: none"> • Keeper or Driver name and address, including e-mail address (if supplied) from Informal and Formal Representations against the issue of Penalty Charge Notices. • Customer details from correspondence. • Registered Keeper Name and address details from warrants of control passed to Enforcement Agencies. • Information regarding potential Registered Keeper or Driver vulnerability or financial information disclosed as part of an Informal or Formal Representation made to the council. • ad hoc information received regarding cases (i.e., complaints from drivers, enquiries from Councillors and MPs. • financial information regarding debtors. <p>Personal Data Which May be Shared with the Council by Enforcement Agencies</p> <ul style="list-style-type: none"> • Correspondence records; • Evidence provided by debtors to Enforcement Agencies to support dialogue regarding the non-payment of Penalty Charges due to the issuing Authority. • Basic details of goods taken into control, such as the vehicle (vehicle registration number, registered keeper enquiries, vehicle make and model, location of vehicle, estimated vehicle value), other goods of value which the enforcement agent takes into control to sell (to settle the debt) • Basic details about debtors, such as name, address, telephone/mobile number, email address
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	<ul style="list-style-type: none"> • Images and audio recordings of debtors or third parties (not minors) if the enforcement officer has activated their body worn video camera • Financial details or / & disclosed medical information e.g. income and expenditure to inform decision making on whether to continue enforcement, whether repayment options are appropriate & whether to continue to pursue enforcement of the warrant of control where extreme vulnerability may be present • Call recordings and notes/transcripts of telephone calls made to the Enforcement Agency • Emails, text messages, correspondence in relation to any dealings with debtors • Information about debtors obtained by the enforcement agency from credit reference agencies, the electoral roll, Court records, and other publicly available sources <p>Some transaction information if debtors have paid monies towards settlement of the debt</p>
<p>Does it include special category or criminal offence data?</p>	<p>No.</p>
<p>Can an individual be identified easily from the information?</p>	<p>Yes</p>
<p>What is the potential impact on privacy of this information?</p> <ul style="list-style-type: none"> • <i>What are the risks/ impact to an individual if this information was lost, stolen or manipulated?</i> • <i>E.g. could it be sold?</i> 	<p>Personal data collected for the purpose of commenting or objecting to the proposals includes names, addresses and e-mail addresses. The risk to an individual, if this data were lost would include ID fraud.</p> <p>Information for processing Penalty Charge Notices:</p> <ul style="list-style-type: none"> • Could be used to locate an individual's address and potentially allow access to details of other

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	<p>PCNs, which could give information as to the driver’s likely routine, or where a driver has been (risk of stalking etc).</p> <ul style="list-style-type: none"> • Risk of ID fraud if identity details are released. • Sensitive information collected as part of assessing an individual's circumstances could be released. • Risks to individuals if information regarding their vulnerabilities is released.
<p>Will this change the manner in which we handle, use or protect this information? <i>e.g. should it be encrypted?</i></p>	<p>. Personal data with respect to commenting or objecting to public notices is treated carefully to ensure that this is unlikely to leak outside the project team (6 members). Data is retained in an electronic folder only accessible by the project team and retained for sufficient time to enable analyses of the comments.</p> <p>With respect to the processing of Penalty Charge Notices the back-office system ensures security of data, by enabling Enforcement Agencies to receive and return warrants via secure portals instead of by e-mail (which is the current solution).</p> <p>Security in place to protect data held on the system, restricted access, passwords, PC encryption, GDPR training already in place. ICT supplier is contractually obliged to comply with GDPR and information management requirements. Data security has been explored as part of the tender process and the supplier has met or exceeded the council requirements.</p> <p>Back Office System is integrated with a separate existing mail fulfilment solution (Quadient), which ensures outgoing correspondence is complete and addressed to the intended recipient. This eliminates the chance of data loss in this part of the process.</p>

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	<p>External Enforcement Agencies are contractually obliged to comply with a strict code of conduct (including industry code of conduct covering information-handling) and GDPR requirements.</p> <p>Council CCTV staff are all BTEC Trained to Level 2/3 CCTV Traffic Enforcement</p>
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3 Consultation process

Consider how to consult with relevant stakeholders.

When did you consult individuals?	The statutory consultation for the new experimental Traffic Management Order is likely start on 15 March 2022 and will last 6 months.
How did you consult individuals?	As part of the statutory consultation process addresses within the School streets and within an area approximately 200m surrounding the streets will be written to explaining the process and inviting comments or objections to the public notice within a 6 month period. Public notices are also fixed to lamp columns within the School Streets and these will be advertised in the Croydon Guardian and London Gazette. There will also be a link on the Croydon Council's website.
If not explain why it is not appropriate.	N/A
Who else within the organisation have you consulted with?	This project is largely contained within the Highways and Parking Service. However, other teams within the Sustainable Communities, Regeneration & Economic Recovery directorate have also been made aware of the changes including Strategic Transport which works closely with the Highway Improvement Team .
Do you need to speak with your processor to assist?	N/A
Do you plan to consult information security experts or any other experts?	Processing personal data as part of the consultation process is not deemed to require security experts as there are standard methods available to ensure data

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	<p>is secure – letters secured in lockable cabinets and e-mails only viewable by certain officers dealing with similar consultation on a daily basis including the project team (6 members). Relevant expertise was enlisted in drafting the tender specification and subject experts were part of the evaluation panel for the ANPR and processing software for the issuing and processing of Penalty Charge Notices.</p>
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4 Assessment of necessity and proportionality of data usage

<p>What is your lawful basis for processing?</p>	<p>The lawful basis for processing is the consultation being a task carried out in the public interest or in the exercise of official authority, principally it being an activity that supports or promotes democratic engagement, in accordance to GDPR Article 6(1)(e). Members of the public that comment or object to the public notice are informed, by return, that their personal data will only be used for the purpose of the formal consultation and retained for as long as necessary to enable this process to take place in accordance with GDPR.</p> <p>Relevant Statutes/Regulations associated with the enforcement and processing of Penalty Charge Notices using ANPR:</p> <ul style="list-style-type: none"> ○ Traffic Management Act 2004 ○ London local Authorities Act 1996 (as amended) ○ London Local Authorities Act 2000 ○ London Local Authorities and Transport for London Act 2003 ○ London Local Authorities Act 2007 ○ London Local Authorities and Transport for London Act 2008 ○ The Civil Enforcement of Parking Contraventions (England) General Regulations 2007 ○ The Civil Enforcement of Parking Contraventions (England) Representations and Appeals Regulations 2007 ○ The Taking Control of Goods Regulations 2013 ○ The Taking Control of Goods (Fees) Regulations 2014 ○ Road Traffic Regulation Act 1984 ○ Tribunals, Courts and Enforcement Act 2007
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	<ul style="list-style-type: none"> ○ The Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions ○ CCTV code of Practice for CCTV Traffic Enforcement <p>Compliance with the information Commissioners Code of Practice for CCTV</p>
<p>Is consent being relied upon to share the information? Has explicit consent been obtained? Are data subjects able to opt out from giving consent?</p>	<p>No. This is a statutory consultation and voluntary for public to take part. However whilst it is voluntary the council will process any personal information in accordance with GDPR (those making comments or objecting are informed that their personal data will only be used for the purpose of the consultation and retained for as long as necessary to complete this process).</p>
<p>Does the processing actually achieve your purpose?</p>	<p>Yes, it enables us to refine the analysis of the consultation responses and assists with validation.</p>
<p>How will the information be collected? Verbally, forms, intranet, interview, 3rd party, anonymous)</p>	<p>The information will be collected via an online forme-mails and letters. Acknowledgements will include a comment that personal data will only be used for the consultation process and retained for as long as necessary to complete this process.</p>
<p>Is there another way to achieve the same outcome?</p>	<p>Statutory consultations must be carried out in line with regulations.</p>
<p>How will the information be used? <i>e.g. to write a report</i></p>	<p>The information will be used to produce a report on the results of the consultation. Processing of PCNs is by trained Council Officers. To enable the issue of PCN's and other Statutory Documentation. Reviewing of contraventions captured by CCTV (ANPR) by Qualified CCTV staff all BTEC Trained to Level 2/3 CCTV Traffic Enforcement. Enforcement of unpaid PCNs by external Enforcement Agencies to collect monies</p>

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	<p>due, or to construct an affordable payment plan, or to make an informed decision about an individual's circumstances.</p>
<p>Do the individuals know and understand how their information will be used? If there are changes to their information does the privacy notice need to be amended?</p>	<p>No. This is a statutory consultation and voluntary for public to take part. However whilst it is voluntary the council will process any personal information in accordance with GDPR.</p> <p>However as this statutory consultation published on the council's website there will be a Privacy Notice provided explaining that those that comment or object give information voluntarily, consent to it being processed and are aware of the GDPR rights. Personal data will be removed once the analysis is completed.</p> <p>Parking Services provide a privacy notice when processing Penalty Charge Notices.</p>
<p>How will it be stored, kept up to date and disposed of when no longer required? <i>e.g. stored in locked cabinet/securely shredded</i></p>	<p>The data will be stored on the Council's servers within a folder that can only be accessed by the project team only. Data on Penalty Charge Notices issued to drivers entering the School Streets during the restricted hours is held on the Parking back-office ICT system and also on Enforcement Agencies back-office systems</p>
<p>How will you ensure data quality and data minimisation?</p>	<p>The participation in the scheme consultation is voluntary and the extent to which a participant provides data is voluntary. For valid comments or objections to be received and processed a name and address is the minimum data required and an e-mail address if the responder uses this as a means to communicate and requires an e-mail response. Investigating officers keep PCN processing information up to date as they become aware of any changes during investigations. Any linked cases are updated at the same time. If cases are with Enforcement Agencies, debtor files</p>

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	<p>are updated in real time. Data received from the DVLA as a result of a mismatch is deleted from the system. CCTV (ANPR) contraventions are reviewed by staff Trained to BTEC Level 2/3 CCTV Traffic Enforcement to ensure that the Council has reasonable grounds for believing a contravention has occurred before requesting Keeper details from the DVLA.</p>
<p>Who will have access to the information within LBC?</p> <ul style="list-style-type: none"> • <i>Include approximate number of users</i> 	<p>The project team (6 members) PCN Processing Officers, Permit Staff (for processing permits for those that can enter the School Streets during the restricted periods such as residents living in the road and Parking Management – approximately 26 staff. CCTV staff and Management - approximately 15 staff. Infrastructure Team – 6 Staff Enforcement Team –7 Staff (Manager, Supervisors and Dispatch Controllers). However, staff are only able to access information appropriate to their role.</p>
<p>Are there new or significant changes to the way we manage, use, handle or collect this information?</p> <ul style="list-style-type: none"> • <i>Include any identified concerns for the individuals, would these changes heighten risks involved</i> 	<p>No. There is a standard approach to the processing of comments or objections to a public notice. This includes collating comments and objections, analysing and responding to these to determine whether the experimental scheme should be retained as implemented, amended or withdrawn depending on the level of objections and affects on the School Streets and surrounding area. Once this data is used and included in a report (not including personal data) then personal information such as names, addresses and e-mail addresses can be destroyed.</p>
<p>Will individuals within an existing database be subject to new or changed handling?</p> <ul style="list-style-type: none"> • <i>If yes amendments need to be made to the privacy notice and these individuals need to be informed.</i> 	<p>No.</p>
<p>What are the internal arrangements for processing this information? <i>e.g. number of staff who will have access</i></p>	<p>The project team (6 members – same as listed in 5a below) will process this consultation data.</p>

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	Currently around 54 staff within Parking Services could be involved with the issue and processing of any Penalty Charge Notices and issuing permits to those that qualify (i.e. residents and businesses within the school zones)
How will the information be updated? <i>e.g. monthly check</i>	There is one planned analysis of the data at the end of the consultation period. No further updates will be required. Once the comments and objections are analysed then personal data can be destroyed.
Does the project involve the exchange of information outside of the UK and are there set standards for how the information will be treated? How will you safeguard international transfers?	No
How will you prevent function creep?	By keeping access to the data to the project team and ensuring that they are aware of the content of this DPIA and of the need to prevent function creep. Personal data is only retained for sufficient time to enable analyses to take place. For the processing of Penalty Charge Notices data is only used for the purpose enforcing and collecting outstanding Penalty Charges and providing parking permits. No changes to the ICT system can take place by the supplier unless authorised by Parking Management and without completing and submitting an approved change request / work order form.

5 Assessment of the risks to the rights and freedoms of data subjects

You must describe the source of risk and the nature of potential impact upon individuals and identify any additional measures to mitigate those risks.

5a Security

Who will be responsible for the control for this information?	Jayne Rusbatch/Tabrez Hussain/Waheed Alam/Claire McWatt/Clare Harris/Diana Salmon
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	For issuing and processing Penalty Charge Notices; Croydon Back Office ICT Provider (currently Conduent) Croydon, Parking Services (data controller)
How will the access to this information be controlled?	Only the named officers making up the project team (6 members) will have access to the data entered into the online consultation on the Council website. With respect to the issuing and processing Penalty Charge Notices; Authorised access, secured by password protection
Is the data correctly managed to reduce the risk of collateral intrusion to the data subject?	Once downloaded from the online consultation platform, the data will be held on the councils servers in a folder that can only be accessed by the project team. The folder can only be accessed from a council laptop which is Bitlocker and password protected or via Office 365 requiring a password and access code. With respect to the issuing and processing Penalty Charge Notices; all officers with access to the data have had GDPR training and are aware of their responsibilities. Data is only disclosed to persons who have a legitimate reason to see it, such as the data subject, Enforcement Agencies collecting debt on our behalf or officers dealing with casework.
Are there adequate provisions in place to protect the information? If so what are they? <i>e.g. Process, security</i>	See above With respect to the issuing and processing Penalty Charge Notices; security such as egress, SFTP, password protection. Access to back-office systems and portals are secured by password protection and are role specific.

5b Sharing

Who is the information shared with, why are we sharing the information with this organisation?	The information on objections and comments to the public notice is not to be shared with any third party. With respect to the issuing and processing Penalty Charge Notices;
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	<ul style="list-style-type: none"> • London Tribunals - Environment and Traffic Adjudicators. Statutory function to rule on Appeals against PCNs made by Keepers and are in place instead of the Court System now that parking and traffic contraventions are decriminalised. The Council is obliged to submit a copy of the evidence it is relying on to prove the contravention for consideration by the Traffic & Parking Adjudicator (also sent to the Appellant). • Traffic Enforcement Centre (Northampton County Court), in order to issue Warrants of Control and enforce non-payment of PCNs. • External Enforcement Agencies: In order to collect outstanding debt as in the process specified in the Traffic management Act 2004 and other parking legislation • Internal Enforcement Agency, Internal Debt Recovery Team, & Croydon Gateway: In order to collect outstanding debt as in the process specified in the Traffic Management Act 2004 and other parking legislation • Evidence may be provided to the Local Government Ombudsman following a complaint by the Registered Keeper. • The Registered keeper, who may request information from the council. • Council External Legal – should we need to defend claims.
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	<ul style="list-style-type: none"> • Back Office ICT provider when data is entered / uploaded onto the ICT system.
<p>What purpose does the information we are sharing have to the third party?</p> <ul style="list-style-type: none"> • <i>Ensure that we only share relevant information and not excessively</i> 	<p>N/A for the statutory consultation With respect to the issuing and processing Penalty Charge Notices; please see box above, listing the third parties, and the purposes for which they are expected to use the shared information.</p> <p>Information needed in order to issue Warrants of Control and for the Council to fulfil its obligations under parking legislation</p>
<p>Who will have access to the information, externally?</p> <ul style="list-style-type: none"> • <i>Include approximate number of users</i> • <i>Describe any sharing arrangements and what the level of access is. It may help to produce a diagram to show the data flows.</i> 	<p>No one with respect to the statutory consultation. For issuing and processing Penalty Charge Notices only those who have a legitimate need & under parking legislation.</p> <ul style="list-style-type: none"> • LGO • London Tribunals • External Enforcement Agencies Data (information) is uploaded by Croydon onto a secure portal, which is accessed by the agencies • ICT Provider
<p>How will it be transmitted to third parties and when? How often?</p>	<p>For issuing and processing Penalty Charge Notices only when required, this will depend upon the steps taken or not taken by the Registered Keeper. This will be by uploading onto a secure portal, electronically by SFTP, and by post. Where e-mail is used by Enforcement Agencies use e-mail to pass data back to the Council, this is required to be secured by Egress. Where the Council needs to transmit data by e-mail, this will be encrypted using the functionality available in the on-line version of Outlook. Moving forward, the Council is changing to Microsoft OME (encrypted</p>

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	<p>email) service (estimated end of April / May) this will allow the whole council to use encrypted email.</p>
<p>Is there a data sharing agreement in place?</p>	<p>For issuing and processing Penalty Charge Notices external Enforcement Agencies and ICT Supplier are contractually obliged to handle data securely. A data sharing agreement is included within these contracts and available on request. Additionally, the Council is required to comply with the DVLA's own data security requirements.</p>
<p>At what stage will the information be transferred?</p>	<p>For issuing and processing Penalty Charge Notices only at the appropriate point in the PCN Processing Cycle – When dealing with an Appeal, following the issue of Warrants of Control, following authorisation from Northampton County Court (TEC), or when there is a legitimate need to do so e.g., following a complaint to the LGO.</p>

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5c Identified Risks and assessment:

You should take into account the sensitivity of the information and potential harm that inappropriate disclosure or use of the information could cause to any individuals concerned. You should also consider the reputational loss to the Council and the potential for financial penalties being imposed by the ICO.

To assess the level of risk you must consider both the **likelihood** and the **severity** of any impact on individuals. A high risk could result from either a high probability of some harm or a lower possibility of serious harm.

The severity impact level and likelihood should be scored on a scale of 1 to 10 with 1 being low severity and 10 high. The two scores should be **added** together. The RAG status is derived from the following scale:

Score:

- 15 to 20 = Red (High)
- 8 to 14 = Amber (Medium)
- Below 8 = Green (Low)

To be completed by Project Sponsor

Risk Identified	Severity of Impact	Likelihood of harm	Overall RAG rating
Statutory Consultation: Information being lost or stolen which leads to views expressed from an individual household becoming public. This carries risk to members of the individual household, reputational risk to the Council potential financial penalty	3	1	4 (Low)
Process personal data without providing a privacy notice directly to the individual leading to reputational risk and potential financial penalty. Please note that respondents objecting and commenting on the experimental School Street schemes will be informed that their personal data will only be used for the purpose of the statutory consultation process and information destroyed once this exercise is completed.	9	1	10 (Medium)
Issuing and processing Penalty Charge Notices:	7	1	8

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Data sent to Enforcement Agency back-office system by Parking Services is inappropriately accessed by Enforcement Agency staff. Regular training will reduce the likelihood of this occurring.			
Data held on the back-office system is inappropriately accessed by council staff. Regular training will reduce the likelihood of this occurring.	7	1	8
Information is disclosed by Enforcement Agency staff to someone other than the Registered Keeper. This would be a data breach that would be required to be disclosed to the Council's Data Protection Officer.	7	3	10
Information is disclosed by council staff to someone other than the Registered Keeper. This would be a data breach that would be required to be disclosed to the Council's Data Protection Officer.	7	3	10
Potential Data loss during storage by Enforcement Agency.	7	1	8
Risk of Misuse of Information by Enforcement Agency	7	1	8
Risk of Misuse of Information by Council Staff	7	1	8
Risk of accidental data loss by documents being sent to someone other than the intended recipient. This would be a data breach that would be required to be disclosed to the Council's Data Protection Officer.	7	3	10

6 Identify measures put in place to reduce risk.

You must now identify additional measures you could take to reduce or eliminate any risk identified as medium or high risk in step 5.

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To be completed by the Project Sponsor

Risk Identified	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
Process personal data without providing a privacy notice directly to the individual leading to reputational risk and potential financial penalty	Linked provide in the online survey to the privacy notice when/where respondents are asked to consent to us holding their information	Eliminates	Removed	Yes
Statutory Consultation: Information being lost or stolen which leads to views expressed from an individual household becoming public. This carries risk to members of the individual household, reputational risk to the Council and potential financial penalty	The majority of comments and objections are received by e-mail and secure e-mail accounts and folders ensure that this risk is virtually eliminated. Comments and objections received by post can be destroyed once scanned	Eliminates	Removed	Yes
Issuing and processing Penalty Charge Notices: Data sent to Enforcement Agency back-office system by Parking Services is inappropriately accessed by Enforcement Agency staff.	Regular training, including GDPR on-line training, will reduce the likelihood of this occurring.	Reduced	Reduced	Yes
Information is disclosed by Enforcement Agency staff to someone other than the Registered Keeper. This would be a data breach that would be required to be disclosed to the Council's Data Protection Officer.	Regular training, including GDPR on-line training, reduces the likelihood of this occurring although there will always be an element of human error	Reduced	Reduced	Yes

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Information is disclosed by council staff to someone other than the Registered Keeper. This would be a data breach that would be required to be disclosed to the Council's Data Protection Officer.	Regular training, including GDPR on-line training, reduces the likelihood of this occurring although there will always be an element of human error	Reduced	Reduced	Yes
Potential Data loss during storage by Enforcement Agency.	Enforcement agencies are contractual obliged only to retain data for as long as required normally until the penalty is paid for or cancelled.	Reduced	Reduced	Yes
Risk of Misuse of Information by Enforcement Agency	Risk can be minimised through regular training and warnings of fines for such misuse.	Reduced	Reduced	Yes
Risk of accidental data loss by documents being sent to someone other than the intended recipient. This would be a data breach that would be required to be disclosed to the Council's Data Protection Officer.	IT systems designed to provide reminders to minimise such accidental data breaches.	Reduced	Reduced	Yes

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		<i>(DPO should advise on compliance, measures to mitigate risk and whether processing should proceed)</i>
Consultation responses reviewed by:		If your decision departs from individuals views you must explain your reasons.
DPIA to be keep under review by:		

If you require further guidance to complete this DPIA please contact:

Information Management Team (IMT)

Ext: 47777

Email: information.management@croydon.gov.uk

Data Protection Officer

Email: DPO@croydon.gov.uk

Equality Analysis Form

1. Introduction

1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	Sustainable Communities, Regeneration & Economic Recovery Directorate
Title of proposed change	School Streets
Name of Officer carrying out Equality Analysis	Jayne Rusbatch

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

The council's Parking Policy 2019-2022 aims to effectively manage parking provision across the borough in line with the Corporate Plan and the borough's growth objectives. Section 4 of this policy details the School Streets objectives, to ensure we secure 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. The school run presents a particularly harmful combination of air pollution and inactivity for our children and parents.

The Council introduced the first School Streets schemes in 2017 and in September 2020 introduced a further 10 Street schemes under Experimental Traffic Management Order (ETMOs), for a period of 18 months. School streets restrict access for motor traffic except resident permit holders, cyclists, emergency services and certain other groups such as carers and those with disabilities.

The first 6 months (1 September 2020 – 1 March 2021) of this 18 month period are known as "statutory objection period" during which anyone affected by the trial scheme has an opportunity to submit objections while the trial is in operation.

During the statutory objection period, COVID-19 pandemic restrictions introduced a lockdown in early December 2020, including the closure of schools. At this time the council took the decision to suspend enforcement of all 10 experimental School Street schemes from 17 December 2020 to 8 March 2021.

The suspension of enforcement meant that the schemes were not operational for almost half of the statutory objection period, and the public was unable to appreciate the true effects of the experimental schemes. This has meant the council has not been able to make a fair assessment on how the scheme performed for the full 18 months, and is now proposing to implement new ETMOs for a new 18 month period, in the absence of COVID-19 restrictions and in normal traffic conditions.

Motor traffic is restricted from entering the School Street at pick up and drop off times, reclaiming road space to create pedestrian and cycle zones. The operational hours for each school street is 08.00 – 9.30 and 2-4pm Monday to Friday term time only. Times are indicated by traffic signs. School Streets aim to create safer and more pleasant environment outside each school, discouraging travel to school by car and promoting walking, cycling and scooting, achieving positive health outcomes for all.

The changes described allow each school and resident community access to the reclaimed space on the road, changing the way the streets are used. It is hoped that this new use of space by the school and community will support active travel.

Reducing traffic from the school gates also helps to tackle air pollution, which is a significant problem for children and pregnant women. Children are particularly vulnerable to the effects of air pollution and, in the context of School Streets, recent studies have indicated that increases in particulate matter PM2.5 can make individuals more susceptible to the effects of COVID-19, increasing the mortality rate. This is therefore a public health priority. Removing congested traffic and idling vehicles from the immediate vicinity of the school entrance, while creating an environment that encourages families to travel to school more actively, may have positive health outcomes for the school

community. It is hoped that increased safety and reduced convenience for those driving will encourage more children and parents to walk, cycle and scoot to school.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative

School Streets aim to discourage travel to school by car and promote active travel. This is important as in Croydon, we have a growing issue with obesity in the population, including children. Croydon has the fourth largest proportion of young people in London, with one in four Croydon residents (24.5%) aged between 0-17 years*. It is known that around 1 in 5 children (21.8%) in reception were overweight or living with obesity, and this position worsens in their last year of primary school (Year 6) where around 2 in 5 children (39.5%) were overweight or living with obesity*. School Streets create healthy and safe environment near to schools, to encourage modal shift, which will in turn contribute to addressing the obesity issue.

The 65 years plus age group makes up 13.9% of the total population in Croydon. In London, this proportion is smaller at 12.2% and in England it is much bigger at 19.6%*. There is likelihood that some of this group may be more reliant on vehicular modes of travel, and consequently would be disadvantaged by the proposals in that they could not drive in the School Streets during the operational hours, but this is more than outweighed by the air pollution benefits. Air pollution is an important public health issue contributing to illness and shortened life expectancy, that disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly.

The 2011 Census figures showed that 14.1% of the population in Croydon had their day-to-day activities limited to some extent by a long-term health problem or disability. School Streets will not disproportionately impact on this group as eligible residents are able to apply for exemption permits, to allow them (or their nominated carer) to drive in the School Streets during the operational hours.

* Source: Croydon Observatory www.croydonobservatory.org

+ Source: Patterns and trends in child obesity in Croydon; A presentation of 2019/20 NCMP data at local authority level, July 2021

Table 1 – Positive/Negative impact

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	<ul style="list-style-type: none"> • The school streets schemes treat in general primary school sites, and therefore all age groups will benefit from a safer, quieter and clean street scene during pick up/drop off times. • The schemes may offer additional space where footways are narrow making areas outside the school gates less congested. • The elderly population may also benefit from such schemes as equally to the younger age groups this will provide them with a quieter street scene where as an example crossing the road outside the school may make it easier without the need to look out for moving traffic. • The scheme benefits people of all ages as it encourages travel to and from school in an active forms such as walking and cycling resulting in better health outcomes. • Public Health (NHS) data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London. 7.5% of premature deaths in Croydon are linked to air pollution. Failing to address NOx and particulate 	<ul style="list-style-type: none"> • For children that may need to be dropped/picked up close to the school gates, for reasons such as injuries or disabilities the school street may temporarily be a hindrance. However, the council has made provisions to the schools to request access on their behalf in such circumstances. • Conversely, older people may be more reliant on travel by motor vehicle and in some cases journey times may increase as a result of the proposal, but the impact is expected to be limited and outweighed by improvements to safety and air quality 	<ul style="list-style-type: none"> • Air quality action plan 2017 – 2022.

	<p>matter emissions in Croydon would deprive many local people of their fundamental right to safe air.</p> <ul style="list-style-type: none"> Public Health data shows one in four Croydon residents (24.5%) aged between 0-17 years. It is known that around 1 in 5 children (21.8%) in reception were overweight or living with obesity, and this position worsens in their last year of primary school (Year 6) where around 2 in 5 children (39.5%) were overweight or living with obesity. 		
Disability	<ul style="list-style-type: none"> Exemptions apply to all residents who have a vehicle registered to an address within a School Street zone. This includes any residents who may have disabilities. Reducing road danger also has the potential to enable more people to participate in active travel who may previously have been discouraged to so perhaps because of their disability. For example, cycles can improve mobility and access for disabled people, many of whom do not have access to motor vehicles. If individuals do not have a Blue Badge, additional exemptions may be considered in special circumstances on a case by case basis. For example, to allow a SEN Transport bus to collect a child from a residence within a School Street. 	<ul style="list-style-type: none"> There may be individuals who are not aware that they could be eligible for an exemption even in limited special circumstances. Blue Badge holders are eligible for an exemption, as are residents who have registered carers (the carers vehicle is exempted). As a mitigation measure the council will inform the public of the potential exemptions they may be able to apply for. 	<p>Air quality action plan 2017 – 2022</p> <p>Blue Badge Scheme</p> <p>Croydon Observatory</p> <p>Disabled Parking Accreditation Scheme in association with Disabled Motoring UK.</p>
Sex	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and 		<p>Air quality action plan 2017 – 2022</p>

	public health challenges for all residents and visitors by implementing parking related measures		
Gender Identity	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures 		Air quality action plan 2017 – 2022
Marriage or Civil Partnership	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures 		Air quality action plan 2017 – 2022
Religion or belief	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures 		Air quality action plan 2017 – 2022
Race	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures. The proposal is expected to increase participation among under-represented groups in schools that 		Air quality action plan 2017 – 2022

	are located in areas of higher deprivation. The schemes may help to create an environment helping to increase the proportion of BAME groups who choose to cycle.		
Sexual Orientation	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures. 		Air quality action plan 2017 – 2022
Pregnancy or Maternity	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures. 	<ul style="list-style-type: none"> Potential negative impact on parents during pregnancy from the driving restrictions. As a mitigation measure the council can issue temporary exemptions on a case by case basis if needed. 	Air quality action plan 2017 – 2022

Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

3.2 Additional information needed to determine impact of proposed change

Table 2 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion
Additional information may come to light during the implementation phase of the schemes and will monitor this.		

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Table 3 – Impact scores

<p>Column 1</p> <p>PROTECTED GROUP</p>	<p>Column 2</p> <p>LIKELIHOOD OF IMPACT SCORE</p> <p>Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Column 3</p> <p>SEVERITY OF IMPACT SCORE</p> <p>Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Column 4</p> <p>EQUALITY IMPACT SCORE</p> <p>Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p>Equality impact score = likelihood of impact score x severity of impact score.</p>
Age	2	2	4
Disability	2	2	4
Gender	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	1	1	1
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	2	2	4

4. Statutory duties

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council’s ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

Important note: If the proposed change adversely impacts the Council’s ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified above (table 1). Attach evidence or provide link to appropriate data, reports, etc.):

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	There may be individuals who are not aware that they could eligible for an exemption even in limited special circumstances.	As a mitigation the council will inform the public of the potential exemptions they may be able to apply for, through communications around the sites at the time of launch and permanently on our website.	Parking	Prior to and at launch of each site Ongoing via the website

Equality Analysis

		Review exemptions criteria to ensure no unanticipated impact on protected characteristic group	Parking	12 months after launch
Race		Identify any further data sources to monitor impact and review EqIA	Parking	3 months after decision
Sex (gender)		Identify any further data sources to monitor impact and review EqIA	Parking	3 months after decision
Gender reassignment				
Sexual orientation				
Age	<p>For children that may need to be dropped/picked up close to the school gates, for reasons such as injuries or disabilities, the School Street may temporarily be a hindrance.</p> <p>Conversely, older people may be more reliant on travel by motor vehicle and in some cases journey times may increase as a result of the proposal.</p>	<p>The council has made provisions for the schools to request access on their behalf in such circumstances.</p> <p>The impact on older people is expected to be limited and outweighed by improvements to safety and air quality.</p>	Parking	Ongoing (process already in place)
Religion or belief				
Pregnancy or maternity	Pregnant parents would be restricted from driving in the School Street.	As a mitigation measure the council can issue temporary exemptions on a case by case basis where needed. The council will inform the public of the potential exemptions they may be able to apply for, through communications around the sites at	Parking	Prior to and at launch of each site Ongoing via the website

Equality Analysis

		the time of launch and permanently on our website.		
Marriage/civil partnership				

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter **X** in column 3 (**Conclusion**) alongside the relevant statement to show your conclusion.

Decision	Definition	Conclusion - Mark 'X' below
No major change	<p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review.</p> <p>Extensive communication with the teachers and families of each school, as well as local -residents and businesses within the affected area, will take place before the trial period begins. Feedback and queries are monitored on an ongoing basis via the dedicated School Streets mailbox for each scheme. Changes in numbers of children travelling to school by car and travelling actively will be monitored by the school through hands up surveys on a termly basis Hands up surveys from each school will also be used as a way of measuring levels of active travel before and after each scheme has been implemented.</p> <p>Each scheme is being implemented on a trial basis. If a scheme receives overwhelmingly negative feedback or is deemed to pose a risk to those using the Pedestrian and Cycle Zone, the trial can be reviewed and stopped at any time.</p>	
Adjust the proposed change	<p>We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</p>	X
Continue the proposed change	<p>We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly</p>	

Equality Analysis

	set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet	Meeting title: Traffic Management Advisory Committee Date: March 2022	

7. Sign-Off

Officers that must approve this decision	
Equalities Lead	Name: Gavin Handford Date: 14 March 2022 Position: Director of Policy, Programmes & Performance
Director	Name: Sarah Hayward Date: 14 March 2022 Position: Acting Corporate Director – Sustainable Communities, Regeneration and Economic Recovery

REPORT TO:	TRAFFIC MANAGEMENT ADVISORY COMMITTEE 8 July 2020
SUBJECT:	SCHOOL STREETS
LEAD OFFICER:	Shifa Mustafa, Executive Director, Place
CABINET MEMBER:	Councillor Stuart King, Acting Cabinet Member for Environment, Transport & Regeneration (Job Share)
WARDS:	Bensham Manor, Broad Green, Coulsdon Town, Crystal Palace & Upper Norwood, Norbury Park, Old Coulsdon, Purley Oaks & Riddlesdown, Sanderstead, South Croydon, Waddon, Woodside
CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON:	
<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 are specified in the Parking Policy 2019–2022, to support objectives in the:</p> <ul style="list-style-type: none"> • Corporate Plan 2018 – 2022. • Third Local Implementation Plan (LIP3). • Air Quality Strategy and Air Quality Actions Plan. • Croydon’s Public Health Strategy. • Croydon’s Community Strategy 2016 – 2021. 	
FINANCIAL IMPACT:	
<p>The implementation and operation of the 10 new School Streets is budgeted for. The recommendation to start all 10 schemes from 1 September 2020, as opposed to stagger their starts until January 2021, will have a revenue effect of (127k) in the current financial year – i.e. additional revenue.</p>	
RECOMMENDATIONS:	
<p>That the Traffic Management Advisory Committee recommend to the Cabinet Member for Environment, Transport and Regeneration that the Cabinet Member:</p> <ol style="list-style-type: none"> 1.1 Note the summary of responses received to the informal engagement with occupiers within the areas potentially affected by 11 current School Street proposals. 1.2 Agree, for the reasons detailed in this report, to proceed with introducing Experimental Traffic Regulation Orders and the consultation under the experimental procedure regarding the proposal for new pedestrian zones to restrict, during the start (8.00am to 9.30am) and end (2.00pm to 4.00pm) of the school day (i.e during term time), the use of motor vehicle traffic (except permit holders and emergency vehicles) along the 10 School Streets. To clarify; pedestrians and cyclists would be allowed. 	

The 10 School Streets are in the following locations as illustrated in Appendix 1:

- a. Christ Church CofE Primary School (Purley Oaks & Riddlesdown)
- b. Downsview Primary School (Norbury Park)
- c. Ecclesbourne Primary School (Bensham Manor)
- d. Harris Primary Academy Hailing Park (South Croydon)
- e. Keston Primary School (Old Coulsdon)
- f. Kingsley Primary Academy (Broad Green)
- g. Oasis Academy Reylands (Woodside)
- h. Ridgeway Primary School (Sanderstead)
- i. St Thomas Becket Catholic Primary (Woodside)
- j. St Joseph's Catholic Junior School (Crystal Palace & Upper Norwood)

- 1.3 Agree not to proceed with an experimental scheme and consultation in 2020 at: Harris Academy Purley Way (Waddon).
- 1.4 Agree to proceed with a formal consultation on extending the operational hours to 7.30am to 9.30am and 2.00pm to 4.00pm (during term time) of the pre-existing School Street in Fairfield Way, Dunsfold Rise and Meadow Rise, at the Woodcote schools (Coulsdon Town ward), as illustrated in Appendix 2.
- 1.5 If consultations are agreed at 1.2 or 1.4, delegate to the Highway Improvement Manager, Public Realm Directorate the authority to give the notice.
- 1.6 Note that the outcomes of the consultations indicated in 1.2 above would be a Key Decision and will therefore be referred back to the Traffic Management Advisory Committee in 2021 for advising the Cabinet Member for Transport and Environment (job share) on whether to change, withdraw or make permanent each the 10 individual proposals.

2 EXECUTIVE SUMMARY

- 2.1 Roads with a school entrance are spaces where children and moving motor vehicles co-exist. Many such roads are have hostile traffic and parking conditions at the start and end of the school day. The perceived unsafe conditions discourage many parents from walking and instead encourage more car use.
- 2.2 The air pollution and inactivity that result from car driving on the school run is a public health concern. Regional and local transport policies translate into a need for actions to help reverse the trend of an increasing number of children being driven by car to school. Statutory guidance on the Covid-19 recovery directs local authorities to reallocate road space to people walking and cycling, both to encourage active travel and to enable social distancing, including fast tracking the implementation of School Streets that are under consideration.
- 2.3 A School Street, in present context, is a road 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, to help encourage children and parents use cars less and to walk, cycle and use public transport more. There are good indicators that School Streets support health and wellbeing, and that they can contribute to learning opportunities for children (detailed in section 3.9.2).

2.4 An initial engagement with regards to requests for 11 new School Street schemes has produced a result as follows:

- 2,679 consultation letters issued.
- 457 responses received (17%).
- 53% are in favour of the proposal.
- 46% are opposed to the proposal.
- 1% are undecided.

2.5 The recommended subsequent 6-month consultation on proposed Experimental Traffic Regulation Orders to implement School Streets in 10 of the 11 locations is due to start on 1 September 2020. The outcome of this statutory consultation will be reported to this Committee for consideration.

2.6 In response to residents' feedback and learning, a further consultation is recommended on amending the pre-existing Traffic Regulation Order for the School Street at the Woodcote Primary and High Schools, to extend the start time of the operating hours by 30 minutes in the mornings and afternoon. The outcome of this separate consultation will be considered by the Executive Director, under the scheme of delegation, unless significant and potentially controversial objections are received.

2.7 The implementation and operation of the 10 new School Streets is budgeted for. The original budget assumed staggering the start of the 10 schemes between September 2020 and January 2021. Starting all 10 schemes under Experimental TROs from 1 September 2020 will have a revenue effect of (127k) – i.e. additional revenue.

3 DETAILS

3.1 POLICY OBJECTIVES

3.1.1 The Parking Policy 2019-22¹ and its associated Actions Plan was agreed by Cabinet on 25 March 2019, subject to a consultation that concluded in July 2019. The approved Actions Plan sets out to introduce 10 School Streets in 2020/21.

3.1.2 The overarching policy objectives for School Streets and their source references are documented in the Parking Policy 2019-2022. In summary:

- The Corporate Plan responds to National, Regional and Local policies and priorities, including to support the development of a culture of healthy living, deliver the Air Quality Action Plan and tackling idling vehicles, in particular around schools.

- The Third Local Implementation Plan (LIP3) reflects local plans and The London Mayor’s strategy, including that all local Councils must help children and parents to use cars less and to walk, cycle and use public transport more. 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.
- The Director of Public Health’s annual report 2017 calls for action on air pollution and inactivity. It identifies that Croydon has the highest rate of hospital admissions for childhood (0-9 years) asthma and the third highest number of asthma deaths in London. 205 premature deaths in Croydon are linked to air pollution. There are further health concerns associated with 40% of children and 60% of adults in Croydon being overweight.
- 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.
- 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.

3.1.3 The DfT’s statutory guidance on Covid-19² recovery directs local authorities to reallocate road space to people walking and cycling, both to encourage active travel and to enable social distancing. The DfT highlights the urgent need to change travel habits and suggests *“measures should be taken as swiftly as possible, and in any event within weeks”*. The DfT promotes School Streets as one of these measures. It suggests using Permanent, Experimental or Temporary Traffic Regulation Orders (PTRO, ETRO, TTRO) as necessary. The TTRO requires 7 days advanced notice and does not invite objections. The TTRO can remain in place for up to 18 months. The ETRO is similar to the TTRO, but includes a requirement for formal consultation during the first 6 months of the scheme, after which consideration is given to making the TRO permanent, adjusting it or withdrawing it. The PTRO requires a 21-day consultation in advance of a decision to introduce a permanent scheme. The PTRO can only be adjusted or withdrawn by repeating the 21-day consultation.

3.1.4 TfL guidance³, in response to the DfT, highlights the *“significant risks”* from a car-based recovery from Covid-19 in London. The Mayor and TfL *“fully support School Streets as an effective way to enable social distancing and reduce road danger outside schools”* and they advocate their *“rapid roll out”*. The TfL priority criteria include *“where plans are already progressing to deliver a School Street, and can be fast tracked”*. The TfL recommends using ETROs, with public consultation, for these fast tracked School Streets.

3.1.5 The experience from introducing 3 School Street pilots in 2017 tells that failing to consult residents up front can result in distorted responses from the subsequent consultation on making a scheme permanent. It was evident from the 2017 schemes that many respondents objected on grounds of the implementation process, as opposed to considering the merits of actual scheme itself.

3.1.6 As detailed below in this report, the project for the 2020 School Street schemes has already engaged with residents informally in February 2020. In consideration to section 3.1.6 and the fact the TTRO procedure does not invite objections – i.e. the process can risk distorting the future consultation outcome – it is recommended to implement the proposed schemes under the ETRO procedure and consult formally during the first 6 months of the experimental period.

3.2 THE PROBLEM NEAR SCHOOL ENTRANCES

The issues described in this section are notwithstanding the medium term Covid situation referenced in the DfT and TfL standing guidance (3.1.4 and 3.1.5 above).

3.2.1 Car ownership across the UK has grown 39% in the last 20 years⁴. In Croydon, car ownership grew 7% in 3 recent years¹ and is continuing to grow.

3.2.2 The UK birth rate reached a 10 year peak in 2015, with 22% more children being born compared to 2005⁵. The new intakes at primary schools have naturally increased in recent years and the trend of more children reaching school age will continue for some years.

3.2.3 At the same time, many school journeys that previously were considered easy walkable are increasingly made by car. The responses to the present consultation evidence examples of parents driving less than 300m to school. The increasing car use by school parents has a number of reasons, which importantly includes the self-perpetuating fear of the growing number of cars.

3.2.4 The health impacts on children from air pollution and inactivity is not alleviated until a significant proportion of parents stop non-essential car use. Parents will not stop using the car until the school entrance feels safe. The causal link tells that addressing the perception of road safety near to the school entrance can impact positively on air quality and health.

3.2.5 School street traffic at the start and end of the school day does 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 ownership and use.

3.2.6 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 worsen. What is changing, however, is the awareness of and attitude towards air pollution. In Croydon's online public engagement survey in September 2018¹, 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 the alternatives were better. 57% agreed they would walk more and 39% would cycle more if conditions were right.

- 3.2.7 The annual average level of Nitric Dioxides gasses that are harmful to lungs exceeds the 40ug/m³ legal limit throughout the borough¹. The level of air pollution inside a car in congested traffic is typically significantly higher and more damaging than on the pavement⁶.
- 3.2.8 Traffic and parking near to schools is also a nuisance to local residents, who in this consultation have reported obstruction, hostility, pollution and noise problems near to their homes. School facilities are also used after hours, for after school clubs, evening and Saturday activities. All of these attract additional cars, beyond the traditional school run.
- 3.2.9 Separate to the informal consultation on the 2020 suggested schemes, multiple residents within the existing School Street zone in Fairfield Way, Dunsfold Rise and Meadow Rise, Coulsdon, report new problems at the Woodcote Primary and High schools:
- a) The Woodcote scheme was amongst the first experimental pilots that were made permanent in September 2018. It is unique in having retained a 2.30pm afternoon starting time, whereas the 10 other active School Streets now all start at 2.00pm. As the school intake has grown, so has the competition for car-borne pick-up space. Consequently, an increasing number of primary school parents now drive into and park-up in the School Street before 2.30pm, to wait for 45min until the school day ends. The Highway Code for the pedestrian zone (School Street) sign permits a vehicle to drive out of the road at any time.
 - b) The High school intake has also grown and an increasing number of six form students now drive their own cars to school. A growing number of these students arrive before the 8.00am morning start time and park-up in the residential road all day, including being parked when the neighbouring primary school starts and ends.
 - c) Residents report wider conflicts from the parking demand from the expanded use of the school facilities, between 6.00am to 9.00pm on weekdays and mornings until 2.00pm on Saturdays. The activities include breakfast clubs, after school clubs, gymnastics, acrobatics, athletics, football coaching and a Saturday language school (referencing 300 registered students).

The points a) and b) above can be countered by adjusting the morning and afternoon start times of the existing School Street.

Most of the activities in point c) are not primarily attended by younger children. Their control is outside the intended purpose of the School Street and should therefore be addressed by general parking management measures. It is not recommended to extend the School Street to Saturdays.

- 3.2.10 A weakening in conventional parking control measures at schools has resulted from the Deregulation Act 2015. Prior to the Act, a camera vehicle was a strong deterrent to parking contraventions near to school entrances. A single camera vehicle could efficiently cover many schools daily. Public opinion however perceived this method of enforcement as being over-zealous and the 2015 Act removed the powers to use camera enforcement for most

parking contraventions. Camera enforcement is now mainly associated with moving traffic. Static camera enforcement is still used at a number of school zigzag locations. The zigzag is however not the whole problem near to schools. The camera cannot enforce parking on corners, driveways or behaviours that results in congestion (e.g. stopping to set down children in the middle of the road). Enforcing the zigzag does also not address the amount of moving traffic.

3.2.11 Manual enforcement, by patrolling Civil Enforcement Officers (CEO), is a weaker deterrent to parking contraventions near to school entrances. School parents tends to wait in or near to their vehicles and will simply move on once a CEO shows up and starts recording vehicle details. Most will simply drive around the block and park up again, once the CEO has left the road. As an example, the parking enforcement team made 44 targeted visits to Keston Primary School in the first 10 months of 2019/20, in addition to other incidental patrolling and a full week of co-patrolling with the Police coordinated Safer Neighbourhood Team. The efforts resulted in just 2 penalty charges being issued and they have not managed to eliminate bad parking practices. It is practically impossible to have an everywhere permanent presence for moving on drivers at the more than 130 schools in the borough.

3.2.12 The manual method of enforcement also regularly results in undesirable incidents of arguments and foul language from drivers, which can be intimidating and set a bad example in front of the children.

3.3 EVIDENCE FOR SCHOOL STREETS

3.3.1 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 4.

3.3.2 Walking and cycling to school benefit children's health and wellbeing. A national survey of head teachers at schools with School Street schemes suggest that children who walk or cycle arrive at school more alert, happier and ready to work (UK100, August 2019). In Croydon, the head teachers also report improved punctuality and uptakes in breakfast clubs. The lobby group Mums for Lungs references studies evidencing that air pollution contributes to reduced ability to learn and poorer exam performance⁷. The School Streets thereby contribute to both better health outcomes and learning opportunities for the children.

3.3.3 When a parent must use the car, then the School Street suggests that they should park in a safe and legal place well away from the school entrance and walk the last leg of the school journey. One information source suggests that parents should park at least 2-minute walk away from the school entrance⁴, to benefit children's health and wellbeing.

3.3.4 The School Street is not an isolated device. It supports the educational and information efforts of the Council's Road Safety and School Travel Planners, including their coordination with the TfL STARS and Living Street's WOW

Travel Tracker initiatives. STARS aims to inspire young Londoners to travel to school sustainably, actively, responsibly and safely by championing walking, scooting and cycling. Living Streets is a charity that inspires the nation to walk more. WOW is a pupil-led initiative where children self-report how they get to school every day using the interactive WOW Travel Tracker.

- 3.3.5 Before and after surveys, precisely 1 year apart, have indicated the initial School Street schemes, in combination with educational efforts, have significantly reduced car use. They identified a 15% (least case) to 62% (best case) uptake in walking, cycling and scootering, and a 15% to 25% reduction in car use at the various scheme locations. The variances in the outcomes 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 data 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 the reluctance to walking naturally appears higher.
- 3.3.6 The 11 existing School Streets did all attract initial concerns over the traffic and parking problems being displaced into neighbouring roads. However, the residual parking has invariably been less in amount and is dispersed over a wider area, compared to the prior situation at the school entrance. Feedback suggests that the School Street does not result in severe displacement and that any reduction in car use will in fact also benefit the surrounding areas. There has been very few concerns raised following the past School Street implementations and any complaints from residents in neighbouring roads have gradually ceased.
- 3.3.7 The improved situation has not happened on day one, as parents have clearly needed a little time to adjust. Some parents need to see the School Street becoming perceivably safer, before being ready to consider the alternatives to car use. Parents also 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.
- 3.3.8 The proposed School Street zones aim to be extensive enough to practically make the road with the school entrance perceivably safer, 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.
- 3.3.9 Anecdotally, the chair of one residents association has commented six months after the introduction in one location: *“It’s been such an improvement to the residents, but I [also] notice the parents and pupils seem less manic with a more relaxed feel morning and afternoons. It would be such a shame to go back to the pandemonium we used to have. We have recently paid to have the entire verge cleared and litter picked - much because this scheme has made us feel prouder of the road now it is calmer and we don’t have the daily abuse we all used to dread”*.

3.4 METHOD FOR SELECTING THE PRESENT SCHOOL STREET PROPOSALS

3.4.1 4 favourable but unfulfilled school requests from 2018, plus incidental requests from schools, parents and/or residents collected during 2019 were considered. An objective method was used to priority rank the schools. 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 defines an objective priority ranking.

Table 1 – Schools prioritisation method		Assessment multiplier		
Factor	Weight	Favour	Neutral	Unfav.
School is STARS committed.	12%	x +1	x 0	x -1
School able and willing to administer own permits.	28%	x +1	x 0	x -1
Health & Safety risk exists – e.g. one or more of: <ul style="list-style-type: none"> • Dangerous parking practices. • Air polluting traffic congestion. • Hazardous road conditions, including speeding through-traffic at school times. • Recurring reports of confrontations between road users, parents and residents. 	19%	x +1	x 0	x -1
Tolerable impact on essential traffic in the immediate and surrounding roads.	20%	x +1	x 0	x -1
Alternative travel options exist, PTAL/CTAL >=2.	9%	x +1	x 0	x -1
Appropriate catchment area, >75% of pupils live within 20min walking distance.	10%	x +1	x 0	x -1
Located within a designated Healthy School Neighbourhood area.	2%	x +1	x 0	x -1

3.4.2 From November 2019, the potential and highest ranked schools were asked to confirm their wish to participate in a suggested scheme. The project continued to reach out to the ranked schools, until by early February 2020 a list of 11 schools was obtained. The selected number has anticipated that 1 or 2 schools might drop out during the consultation process.

Table 2 – 11 schools selected for School Street consultation (in alphabetic order).

School	Post code	Ward
Christ Church CofE Primary School	CR8 2QE	Purley Oaks & Riddlesdown
Downsview Primary School	SE19 3XE	Norbury Park
Ecclesbourne Primary School	CR7 7FA	Bensham Manor

Harris Academy Purley Way	CR0 4FE	Waddon
Harris Primary Academy Hailing Park	CR2 6HS	South Croydon
Keston Primary School	CR5 1HP	Old Coulsdon
Kingsley Primary Academy	CR0 3JT	Broad Green
Oasis Academy Reylands	SE25 4XG	Woodside
Ridgeway Primary School	CR2 0EQ	Sanderstead
St Thomas Becket Catholic Primary	SE25 5BN	Woodside
St Joseph's Catholic Junior School	SE19 3NU	Crystal Palace & Upper Norwood

3.4.3 The schools' catchment areas are shown in Appendix 3. They identify that large proportions of pupils live within realistic walking distances.

3.5 INFORMAL ENGAGEMENT

3.5.1 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 in the locality to contribute their first-hand experiences and observations that are otherwise not obviously available to the local authority officers. The consultees were invited to propose changes to the initially suggested zone layout. The engagement effectively enables people in the locality to co-design the scheme.

3.5.2 An example of the informal consultation letter is included in Appendix 6. The letter was posted to all addresses within 300m road distance to the suggested School Street zone ends. Experiences from past consultations tell that the response rate tends to drop off to below 5% at this distance, indicating that an overall indifference in opinions is reached at such distance. Occupiers further than 300m distance from the scheme do also not have the immediate first-hand experiences and their views risk not being representative of the true needs within the locality. Most weight is normally given to the views of occupiers immediately within the suggested zone.

3.5.3 2,679 consultation letters were posted between 9 January and 5 February 2020. 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 it provided space for open comments. The consultation letter included a drawing of an initially suggested zone and the answers to 12 frequently asked questions. For purpose of supporting a future Data Protection Impact Assessment (DPIA), it also described and presented an opportunity for making comments on the use of ANPR cameras.

3.5.4 457 responses are received, which corresponds to an overall 17% response rate. Tables 3 to 5 provides an analysis. A detailed breakdown of the response quantities is provided in Appendix 5.

Table 3 – Consultation responses summary, by general stakeholder category.

Stakeholder category	Result	Headline comments
Address within the proposed zones	26% response rate	Identify with the problems to be solved. Strong expressions of support for a School Street. Urging a speedy introduction.
	87% in favour 13% against 0% undecided	
Address outside the propose zones	14% response rate	Mixed results between the locations, ranging from strong opposition to strong support. An overall opposition relates primarily to concerns for a displacement of the problem.
	35% in favour 63% against 2% undecided	

Table 4 – Consultation responses summary, by locations.

Proposed location	Result	Headline comments
Christ Church CofE Primary School	<u>Inside zone:</u> 22% response rate 87% in favour 13% against 0% undecided	Respondents from addresses both inside and outside the zone are in favour of a School Street. Low response rate from addresses outside the suggested zone. Some concern about a conflict with the temporary one-way system (due to end June 2020).
	<u>Outside zone:</u> 6% response rate 57% in favour 43% against 0% undecided	
Downsview Primary School, Marston Way	<u>Inside zone:</u> 16% response rate 75% in favour 25% against 0% undecided	Relatively low response rate, with just 5 respondents from outside the zone (vs 20 from inside). There are strong expressions of support from inside the suggested zone. There are equally strong opposition from outside the zone, although the statistically lower significance should be noted.
	<u>Outside zone:</u> 12% response rate 20% in favour 80% against 0% undecided	
Ecclesbourne Primary School	<u>Inside zone:</u> 25% response rate 69% in favour 31% against 0% undecided	Respondents from addresses both inside and outside the zone are significantly in favour of a School Street; but with just 7 respondents from the outside the suggested zone.
	<u>Outside zone:</u> 3% response rate 71% in favour 29% against	

	0% undecided	
Harris Academy Purley Way	<u>Inside zone:</u> 13% response rate 100% in favour 0% against 0% undecided	Low response rate overall. Respondents refer to wider parking issues in the Propeller Crescent off-street parking place.
	<u>Outside zone:</u> 4% response rate 67% in favour 33% against 0% undecided	
Harris Primary Academy Hailing Park	<u>Inside zone:</u> 52% response rate 93% in favour 7% against 0% undecided	High response rate and strongly in favour from within the proposed zone. Majority of responses outside the proposed zone are in favour; but with a relatively low response rate.
	<u>Outside zone:</u> 8% response rate 60% in favour 30% against 10% undecided	
Keston Primary School	<u>Inside zone:</u> 75% response rate 100% in favour 0% against 0% undecided	Very high response rate and 100% in favour from within the suggested zone. Relatively high response rate from outside the zone and strongly against. Residents in Court Avenue accounts for half the responses from outside the zone and they complain that traffic and parking conditions are already intolerable. 14% of Court Avenue respondents said they would support the scheme if it is extended to their road. This is discussed below.
	<u>Outside zone:</u> 25% response rate 25% in favour 72% against 4% undecided	
Kingsley Primary Academy	<u>Inside zone:</u> 11% response rate 100% in favour 0% against 0% undecided	Overall low response rate. Respondents from outside the suggested zone complain about commuter parking from the nearby industrial Factory Lane and they are concerned about additional displacement from a School Street. 10% of respondents (all living within 300m distance) commented that they must drive their child to Kingsley Primary school for road safety reasons.
	<u>Outside zone:</u> 10% response rate 31% in favour 69% against 0% undecided	

Oasis Academy Ryelands	<u>Inside zone:</u> 30% response rate 82% in favour 18% against 0% undecided	Highly favourable response rate from within the suggested zone. Neighbouring Watcombe Road and Ferndale Road have 14% high response rate and are 76% against a scheme. Residents in the 2 roads complain that traffic and parking conditions are already intolerable and they are concerned about displacement. 12% of Ferndale Road respondents said they would support the scheme if it is extended to their road. 7% of respondents have stated the area also needs controlled parking.
	<u>Outside zone:</u> 11% response rate 24% in favour 76% against 0% undecided	
Ridgeway Primary School	<u>Inside zone:</u> 85% response rate 91% in favour 9% against 0% undecided	Very high response rate and 91% in favour from within the suggested zone. High response rate from outside the zone and overall against. Respondents from Ellenbridge Way and Elmfield Way in particular are concerned about displacement and several respondents express a dislike for traffic restrictions in general.
	<u>Outside zone:</u> 41% response rate 34% in favour 63% against 3% undecided	
St Joseph's Catholic Junior School	<u>Inside zone:</u> 42% response rate 100% in favour 0% against 0% undecided	High favourable response rate from within the suggested zone. Mixed response from outside the zone. Bradley Road has a history of rat running and its respondents say the pre-existing one-way system is complicated enough. 18% of opponents in Bradley Road say they would support the School Street if it was extended to Bradley Road.
	<u>Outside zone:</u> 16% response rate 48% in favour 52% against 0% undecided	
St Thomas Becket Catholic Primary	<u>Inside zone:</u> 33% response rate 92% in favour 8% against 0% undecided	High favourable response rate from within the suggested zone. Low response rate overall opposed from outside the zone. Respondents in Birchanger Road are concerned about pre-existing school time problems and displacement.
	<u>Outside zone:</u> 10% response rate 40% in favour 60% against 0% undecided	

Table 5 – Consultation responses, quantification of comments.

Respondents	Qty	Comment
Opposing a suggested scheme	113	Concern about traffic and parking displacement.
	18	Problems not severe enough to merit restrictions.
Total 208 respondents making 369 comments	17	Scheme will have negligible effect on reducing car use.
	16	Reduces access for visitors and deliveries.
	14	Will make roads overall more unsafe, over a wider area.
	13	Enhance parking enforcement instead.
	11	Parents must drive, because walking is unsafe.
	11	Proposed operating hours are too long.
	9	Just a revenue making scheme.
	8	Do more to educate and encourage walking instead.
	8	Infringes my freedom to use the road.
	8	Problems are real, but find another solution.
	7	Restricts access for/to disabled/vulnerable person.
	7	Too inconvenient for residents.
	6	There are enough restrictions in Bradley Road already.
	5	Move the school or relocate excess children to another.
	5	Will unfairly penalise drivers. £130 penalty is too high
	5	Yes, if zone includes Court Avenue (14% of its respondents).
	4 for each	Don't want more enforcement cameras, too many already. Waste of public money.
	3 for each comment	Create drop-off zone on or at the school instead. I have a mobility issue and need to drive my child to school. Public transport alternative is inadequate in Sanderstead. The proposed zone is too small to have any effect. Will adversely affect the 404 bus route in Keston Avenue. Will affect property value.
	2 for each comment	Concern that permit charges will be introduced. Install residents' gate instead. Restrictions do not exclude school holidays. School should ban parents from driving, with exceptions. Some children live too far away for walking. Will increase travel distances and add to air pollution. Will make emergency vehicle access more difficult. Yes, if zone is extended into Allen Road.

		Yes, if zone is extended into Watcombe Road.
	1 for each comment	<p>A family member needs to drive my child to the school.</p> <p>Added street furniture (signs, camera) will ruin public realm.</p> <p>Anti-competitively discriminates home delivery operators.</p> <p>Car use is modern day living and a reality.</p> <p>Children are more exposed to air pollutants when walking.</p> <p>Close the Marston Way school entrance instead.</p> <p>Do more to encourage car share instead.</p> <p>Do more to encourage public transport use instead.</p> <p>Does not address root cause of inadequate road design.</p> <p>Does not guarantee residents a parking space.</p> <p>Extend the times on zigzag to 5.00pm instead.</p> <p>I don't want to pay for parking.</p> <p>I live in Kynaston Avenue and need Attlee Close for parking.</p> <p>I live in Portland Road and need Oakley Road for parking.</p> <p>I live in Selsdon Road and need Haling Road for parking.</p> <p>Introduce school busses instead.</p> <p>Introduce school crossing patrol instead.</p> <p>Make Court Avenue one-way and introduce on-site drop-off.</p> <p>Moving exempt vehicles would be a safety risk to children.</p> <p>Nanny state approach.</p> <p>Narrow Southcote Road to single-file with a zebra instead.</p> <p>Obtain agreement for parents to use pub car park instead.</p> <p>Our Coulsdon Rd customers need Keston Avenue parking.</p> <p>Problem has not been quantified; scheme is not justified.</p> <p>Reopen St Joseph school entrance in Convent Hill instead.</p> <p>Residents in neighbouring roads need permits.</p> <p>School parents could drive into zone via Dickensons Place.</p> <p>Schools to enrol children at walking distance only instead.</p> <p>Stagger school hours instead.</p> <p>Survey questionnaire binary choice is invalid (unspecified).</p> <p>Survey questionnaire is misleading (unspecified).</p> <p>Use camera enforcement of yellow lines and zigzag instead.</p>

		<p>Will adversely affect the 466 bus route in Coulsdon Road.</p> <p>Will cause an increase in road rage incidents.</p> <p>Will enable school staff abusing the road.</p> <p>Will reduce child discipline and encourage playing in street.</p> <p>Will cause parent pick-up lateness, with safeguarding issues.</p> <p>Won't work because Marston Way is a cul-de-sac.</p> <p>Won't work because Sandown Road is a through-road.</p> <p>Yes, if zone is extended into Birchanger Road.</p> <p>Yes, if zone is extended into Euston Road.</p> <p>Yes, if zone is extended into Ferndale Road.</p> <p>Yes, if zone is extended into Onslow Road.</p> <p>Yes, if zone is extended into The Ridge Way.</p> <p>Yes, if zone is extended into whole length of Chapman Road.</p>
<p>In favour of a suggested scheme</p> <p>Total 243 respondents making 308 comments</p>	72	Needed for improving road safety, mostly for children.
	47	Needed for improving access to my home/driveway.
	28	Needed for reducing congestion and bad parking.
	21	Needed for improving air quality.
	18	Needed for reducing hostility and abusive behaviours.
	14	Concern about traffic and parking displacement.
	11	Needed for reducing idling and noise.
	10	Needed for reducing car use.
	8	Needed for improving disabled access
	7	Proposed operating hours are not long enough.
	6	Proposed operating hours are too long.
	5	We also need a CPZ in this neighbourhood
	4 for each comment	<p>Concern about access for visitors and deliveries.</p> <p>Extend zone into Bradley Road (18% of its respondents).</p> <p>Extend zone into The Ridge Way (17% of its respondents).</p>
	3 for each comment	<p>Make the scheme 24 hours.</p> <p>Needed for emergency vehicle access</p> <p>Needed to support access for 404 bus route</p>
	2 for each comment	<p>Concern about access for/to disabled or vulnerable person.</p> <p>Concern about future permit charges being introduced.</p> <p>Does not cover Saturday school at Ridgeway Primary.</p> <p>Extend zone to include Hook Hill.</p> <p>School should provide more off-street staff parking.</p>
1	Add advanced warning sign in Bradley Road.	

	for each comment	<p>Also reverse the one-way traffic direction in Haling Road.</p> <p>Can residents receive visitor passes?</p> <p>Concern there is just one pavement in rest of Montpelier Rd.</p> <p>Deploy more parking enforcement officers.</p> <p>Does not address Nursery School gate in Court Avenue.</p> <p>Don't want more enforcement cameras.</p> <p>Educate parents to walk.</p> <p>Enforcement cameras are needed.</p> <p>Extend zone in Haling Road to both Brighton Road junctions.</p> <p>Extend zone into Allen Road.</p> <p>Extend zone into Beaumont Road.</p> <p>Extend zone into Birchanger Road.</p> <p>Extend zone into Albert Road.</p> <p>Extend zone into whole length of Thomson Crescent.</p> <p>Find a lower cost solution.</p> <p>Limit school street permits to 2 per household.</p> <p>Move Coldhabour bus stop closer to school, with a lay-by.</p> <p>Needed for improving access to our business.</p> <p>Needed for reducing littering by waiting parents.</p> <p>Needed to reduce through-traffic in Hook Hill.</p> <p>Permit eligibility for residents in neighbouring roads.</p> <p>Permit eligibility for child carer, to enable a working mother.</p> <p>Reopen St Joseph school entrance in Convent Hill.</p> <p>School should ban parents from driving.</p> <p>Start scheme at Ridgeway Primary on a trial basis.</p> <p>Will also resolve a level of commuter parking.</p> <p>Will help reduce driving in The Ridge Way.</p> <p>Will increase my petrol costs.</p> <p>Will not stop school staff parking on-street.</p>
<p>Undecided on a suggested scheme</p> <p>Total 7 respondents making 17 comments</p>	3	Will displace problems into neighbouring roads.
	2	Do not believe scheme will have sufficient effect.
	1 for each comment	<p>Existing situation hurts our business (just outside zone).</p> <p>Needed for emergency vehicle access.</p> <p>Needed for reducing hostility and abusive behaviours.</p> <p>Add ANPR enforced yellow box junction at Court Avenue.</p> <p>Nursery children already uses Court Avenue, won't stop.</p> <p>Use education and walking bus.</p> <p>Explore using off-street parking on school grounds.</p>

		<p>Might make the neighbouring roads even more dangerous.</p> <p>Extend the zone to neighbouring roads.</p> <p>Waste of public money.</p> <p>Make the temporary one-way in Montpelier Road permanent.</p> <p>Need parking controls at bend near Montpelier Road T-junct.</p>
Separately to the individual occupier responses from within the locality, 3 ward councillors representing non-respondents within the locality and the wider community have commented		
Keston Primary School	2	Consider that the location is not a cul-de-sac.
	2	Consider impact on the 404 bus route.
	2	Court Avenue and other surrounding roads will become even more clogged at school times.
	2	Keston Avenue is the access road for hundreds of residents in the rest of Keston Avenue and many roads beyond.
	2	It does not discriminate between term time and holiday time and many innocent residents will be fined, or will you issue exemptions to them all?
	1	An extension into the whole of Court Avenue cannot be considered, because patients need to access the growing GP surgery at the opposite end of the road.
	1	When a child has a temporary medical condition, parents have to take them to school and need to be able to get close – otherwise there might be a safeguarding issue.
Harris Academy Purley Way	1	Barring parking at the school would require children and in some cases their younger siblings in lower level more pollutant exposed push chairs to reach the school along the higher polluted A23 Purley Way.
	1	A scheme would have strong attractions to residents of Propeller Crescent.

3.5.5 The primary concern, stated by 54% of respondents in opposition to a School Street, is the fear of displacement of traffic and parking problems into neighbouring roads. As described in section 3.3.6 above, the same concerns have not proven material in the existing School Street locations.

Table 6 – Neighbouring roads where respondents show strong opposition.

Road	Response rate	No	Yes	Unsure	Stated problems
Court Avenue (Keston Primary)	62% (v.high)	97%	0%	3%	Already intolerable pressure from growing residential, school and GP surgery parking.
Ellenbridge Way	34%	86%	14%	0%	

(Ridgeway Primary)	(high)				Do not want nearby restrictions or any parking displacement. Has not stated existing pressures.
Elmfield Way (Ridgeway Primary)	25% (med)	100%	0%	0%	
Watcombe Road and Ferndale Road (Oasis Reylands)	14% (low)	77%	23%	0%	Already intolerable pressure from residential and commuter parking.
Euston Road (Kingsley Primary)	6% (low)	100%	0%	0%	Already intolerable pressure from industrial estate commuter parking.
Bradley Road (St Joseph Primary)	33% (high)	61%	39%	0%	Surrounding roads already have complex one-ways to navigate.
Birchanger Road (St Thomas Beckett)	17% (low)	83%	17%	0%	Already intolerable pressure from school parking.

3.5.5.1 The roads in Table 6, in which residents are in strong opposition to a nearby School Street, are locations where high parking pressure exists already. As described in the sections 3.2.1 to 3.2.4 above, such pre-existing pressures will not lessen, but will likely worsen, unless the road with a school entrance becomes perceivably safer, to support parents in switching away from car use. The School Street will of course not contribute to reducing or increasing any pre-existing residential or commuter parking in nearby roads. Such situations must be addressed by other types of parking control measures.

3.5.5.2 37 respondents in Court Avenue represents the single strongest opposition to a scheme. Respondents say there are already severe difficulties and they fear it will worsen. At Keston Primary school, the 75% of pupils live 12 minutes or less walking distance from the school. More than 90% of pupils live within realistic a walking distance. The last travel mode survey in May 2019, found that 37% of pupils are being driven to school by car. These figures indicate a high potential for reducing car use and alleviating the associated parking pressures. The School Street has demonstrated that it can contribute to such a car use reduction.

14% of the respondents in Court Avenue say they would support a School Street extension that include their road. This indicates some willingness towards the principles of a School Street, but just not in the suggested location under the current circumstances. It is however not possible to propose a zone extension into Court Avenue, for reasons that it would impede patient access to the GP surgery in the road.

3.5.5.3 A concern was raised that hundreds of residents east of the Keston Avenue junction with Court Avenue will become restricted from accessing Coulsdon Road, because Court Avenue and Kerrill Avenue are narrower roads and cannot carry the amount of traffic. This concern is mitigated by residents to the east Keaston Avenue additionally being able to use Taunton Lane and Waddington Avenue for access.

3.5.5.4 10 respondents have commented on Bradley Road being one-way from Crown Dale to the junction with Woodend. The road layout is shown in Appendix 1. The prevailing traffic direction in Bradley Road is south-bound. The one-way in Beaumont Road prevents traffic from the south entering into Bradley Road. School run traffic approaching Woodend north-bound through Bradley Road is therefore primarily internal traffic and assumed very low in quantity. In reaction to feedback from 1 respondent, it is proposed to introduce signs at the turning loop in Bradley Road, saying “No access to Woodend or Crown Dale, Mon-Fri, 8.00am to 9.30am and 2.00pm to 4.00pm”, as is illustrated in Appendix 1. The evolving situation in Bradley Road is to be monitored (see 3.5.6.4 below) for ongoing consideration.

3.5.5.5 Subject to a decision to implement the proposed School Streets, the roads identified in Table 6 would receive an initially enhanced parking enforcement presence, to prevent bad practices developing and becoming the norm while the schemes settle.

3.5.6 Of the remaining comments, the same concerns have all been tolerated or mitigated at the existing School Street schemes. The following highlights the most important:

3.5.6.1 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 Appendix 4).

Trades people, 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.

Universal postal providers have a legal status that permits them accessing pedestrian streets.

3.5.6.2 Educate or use school to instruct parents not to drive needlessly:

As described in section 3.3.4, educational and information devices are already active at the schools and will continue to be used in combination with the School Streets. One respondent names a school in Lambeth that has told parents not to apply for a school place if they think they can drop off children in roads close to the school. The particular school is a secondary school and sixth form. Primary schools in Croydon would find it

difficult to demand similarly, when several have a policy of requiring that children in the youngest years are accompanied to and collected at the school entrance.

3.5.6.3 The operational hours are too long or too short:

The proposed operating hours are those that have proven effective at the pre-existing School Street schemes.

3 respondent have suggested a 24-hour School Street for residents permit holders only, to help overcome all-day and evening parking access problems. Such hours would exceed the intended traffic management purpose of encouraging school run travel modes. It is recommended that residential parking access should be addressed by general parking management measures instead.

5 schools were highlighted as having active after school clubs: Harris Haling Park, Keston Primary, Oasis Reylands, Ridgeway Primary and St Joseph's Junior. 6 respondents have suggested extending the end time to 4.30pm; 2 have suggested 5.00pm, 1 has suggested 5.30pm and 1 has suggested 6.00pm. At the same time, 17 respondents have expressed concerns that the proposed hours are too long. Ending the zone times later than 4.30pm would impede residential visitors and home deliveries for longer and it would potentially impede other commuter traffic. It is recommended to initially propose the 'standard' 4.00pm end times and then monitor and assess any learning, to determine if and where to extend any operating hours.

3.5.6.4 Extend the zone:

On balance of consideration of the consultation responses, it is recommended not to extend any of the originally suggested zones. Firstly, it would not accord with majority view. Secondly, more residents would, potentially needlessly, find difficulties in receiving visitors and deliveries during the times of School Street operation.

18% of respondents in Bradley Road have made the request. The effect on Bradley Road, from a School Street in Woodend should be monitored, with view to reconsider a making separate engagement on extending the zone if future feedback suggests a bigger demand.

Respondents in Birchanger Road highlights pre-existing parking pressures at the eastern entrance to St Thomas Becket School. A School Street in Birchanger Road would have to extend to the Enmore Road junction, which would enclose a large number of residents and potentially impact on essential traffic. The school entrance in Birchanger Road is instead being considered for alternative parking control measures, including a relocation of the zigzag and a small extension of double yellow lines, for road safety and access improvement. This is being considered as a separate consultation.

3.5.7 At Harris Academy Purley Way, the Propeller Crescent service road has issues that do not relate to school run traffic and a School Street would be complex to implement:

- i. The residents parking area is significantly oversubscribed and any time bad parking exists. The existing off-street parking control Traffic Management Order was introduced in 2012, prior to the new school and residential developments, and the TMO no longer suitably describes the place boundaries. This has created gaps in the enforcement capabilities.
- ii. The service road leading past the school is the sole exit route that will permit a right turn into Purley Way, when leaving the nearby Leisure Centre car park. A School Street would encourage parents to park in the Leisure Centre car park (which is preferred), but some would potentially ignore the banned right turn on exiting the car park and could obstruct essential traffic flows in Purley Way.
- iii. Propeller Crescent does currently not meet the highway standard (for turning circles and pavements) as is required for introducing an ANPR enforceable Traffic Management Order. The necessary upgrade works would have significant costs.
- iv. Residents and the school have strongly urged a solution that can be introduced immediately, as opposed to going through the statutory process that would introduce a School Street late in 2020 – or later after highways upgrade works.
- v. The area is a low car developments, where many residents are more dependent on home deliveries. The engagement produced a low response rate. It is conceivable that many of the non-responding car-free households would feel better served without a School Street.

The Propeller Crescent off-street location makes the enforcement more flexible, in some respects, once the signage and place description is put right. The signage was upgraded in w/c 9 March 2020 and it has already enabled more effective enforcement of the school traffic parking in residents permit bays. If these alternative measures remain effective, then it would not be necessary to restrict visitors and home deliveries by introducing a School Street. It is therefore recommended not to proceed with a School Street in Propeller Crescent in the current round of schemes; but instead monitor and assess the impact of the alternative measures that were recently introduced.

3.6 EXPERIMENTAL IMPLEMENTATION AND FORMAL CONSULTATION

3.6.1 Two Public Notices are to be consulted on:

- a) Experimental TRO for new pedestrian zones in the 10 locations described in Appendix 1. The 6-month consultation period to open on 1 September 2020.
- b) Amendment to the existing TRO for pedestrian zones in Fairfield Way, Dunsfold Rise and Meadow Rise as described in Appendix 2. The 21-day consultation period to open on 1 September 2020.

3.6.2 The legal process requires formal consultation in the form of Public Notices published in accordance with the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 (SI 1996/2489) (LATOPR 1996) as temporarily amended by Regulation 3 of the Traffic Orders Procedure (Coronavirus) (Amendment) (England) Regulations 2020 (SI 2020/536) (TOPCR 2020). In brief it means that notices should also be given in digital

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

- 3.6.3 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.
- 3.6.4 It is recommended the result of formal consultation on the Experimental TROs 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.
- 3.6.5 It is recommended for expedience in the Covid-19 response that The Executive Director Place uses delegate authority to implement the amended TRO for the changed hours of operation for the pre-existing pedestrian zones in Fairfield Way, Dunsfold Rise and Meadow Rise, subject to the consultation receiving any significant and potentially controversial objections.

3.7 PRIVACY AND DATA PROTECTION

- 3.7.1 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.
- 3.7.2 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 Data Protection Impact Assessment (DPIA) 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

1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2020/21 £'000	2021/22 £'000	2022/23 £'000	2023/24 £'000
Revenue Budget available				
Expenditure	95	259	259	259
Income	(366)	(1,267)	(1,267)	(1,267)
Effect of decision from report				
Expenditure	130	259	259	259
Income	(528)	(1,267)	(1,267)	(1,267)
Remaining budget	<u>(127)</u>	<u>0</u>	<u>0</u>	<u>0</u>
Capital Budget available				
Expenditure	499	0	0	0
Effect of decision from report				
Expenditure	499	0	0	0
Remaining budget	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

2 The effect of the decision

The implementation and operation of the 10 new School Streets is budgeted for. The established budget also has provision for performing the required consultations. The original plan was to stagger the start of the 10 schemes between September 2020 and January 2021. Starting all 10 schemes in September 2020 instead has a revenue effect of (127k).

3 Risks

School Street compliance will change over time. PCN revenue has reduced 34% at the original pilot sites, over 18 months (i.e. revenue is continually reducing). The schemes however remain self-financing and brings important value through their road safety and air quality objectives. To mitigate the forecast risk, the (528k) income in year 2020/21 has cautiously assumed an immediate 34% compliance effect.

4 Financial options

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.

5 Future savings/efficiencies

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

6 Approved by Felicia Wright, Head of Finance on behalf of the Director of Finance, Investment and Risk and S151 Officer

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 on 23 May 2020, the Department for Transport (DfT) made and brought into force the Traffic Orders Procedure (Coronavirus) (Amendment) (England) Regulations 2020 (SI 2020/536) (TOPCR 2020). The TOPCR 2020 makes temporary amendments to the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 (SI 1996/2489) (LATOPR 1996). This includes the insertion of "Temporary Provisions Applicable During the Coronavirus Pandemic". This establishes alternative publication requirements, which a local authority can adopt where it is required to publish a notice in a newspaper and the authority considers that it would not be reasonably practicable to do so because of the effects of coronavirus, including the restrictions on movement.
- 5.2 The LATOPR 1996 establish the procedures for making a traffic regulation order, (including an Experimental Traffic Regulation Order). The procedural provisions for Experimental Traffic Regulation Orders are set out in regulations 22 and 23 and Schedule 5 to the LATOPR 1996. It identifies the requirements of "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.
- 5.3 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.
- 5.4 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.
- 5.5 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.
- 5.6 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.
- 5.7 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 10 additional School Street zones will require increased permit administration, enforcement duties and Penalty Charge Notice processing. The human resources impact is provided for in the planned budget and establishment. In addition any HR issues which arise other than in the planned budget and establishment will be managed under the Council's policies and procedures.

Approved by: Jennifer Sankar, Head of HR for and behalf of Sue Moorman, HR Director

7 EQUALITIES IMPACT

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

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

7.2 The Equalities Impact Assessment (EqIA) is contained in the EqIA for the Parking Policy⁸, which has a section on School Streets. This EqIA was last reviewed on 28 August 2019. The School Streets operational concept is unchanged since. Feedback from the present engagement has not raised any new or emerging equalities issues. Practical experiences of operating 3 School Streets since 2017 and introducing a further 8 in 2019/20 has been applied to the proposed experiment to ensure lessons learned are reflected in its operation. All potential equality risks have been mitigated. Should the proposed experiment prove successful a full and extensive EqIA review will be written into the project plan as part of any long term changes to the operational methods or in response to any feedback of concern.

7.3 Concern raised during engagement about reduced access to disabled and elderly frail residents is mitigated by making the motor vehicles belonging to the following groups of drivers eligible for an exemption permit, to allow the use of suitable vehicles 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 residents belonging to a group with relevant protected characteristics. This is extended to enabling child care and preventing elder isolation, for example.

Motor vehicles belonging to the following groups and situations are automatically permitted to drive in a School Street, without first obtaining an exemption permit and this will not change during the experimental period:

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

7.4 The School Street proposal has the added advantage of helping to improve access for disabled/vulnerable people, by eliminating congestion and bad parking practices at peak periods during the day. The scheme also supports

the Council's aspiration to reduce air pollution, which disproportionately impacts on the sick, young and elderly, and their general health outcomes.

Approved by: Barbara Grant on behalf of Yvonne Okiyo, Equalities Manager

8 ENVIRONMENTAL IMPACT

- 8.1 The School Street schemes are expected to reduce car use, which in turn will contribute to reducing congestion and air pollution in a wider area.
- 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 Hostile 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 children. The School Street schemes can significantly reduce and disperse such disorder away from the school entrance where a concentration of children exists.

10 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 10.1 The Council has reviewed and tried various options to reduce 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 recommended formal consultation would not accord with the expressed preference of the majority of those who live within the proposed School Street zones. It would also be a missed opportunity to relieve children, parents and residents from obstruction, road safety, air quality and inactivity problems resulting from traffic and parking.
- 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 traffic with regards to resolving congestion and discouraging car use. The lower financial efficiency of deploying CEOs also makes this option less affordable in the longer term. It is practically impossible to provide a daily presence at each the 130 schools in the borough.

- 11.3 The Council, and the London Mayor's office, are already working with schools and parents in other ways to encourage less car use; but nothing has yet emerged as equally effective as the combination School Street, in helping to reverse the trend of the many more children being driven to school.
-

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

APPENDICES TO THIS REPORT

Appendix 1 – Drawings and particulars of the 11 proposed School Street schemes.

Appendix 2 – Drawing and amendment particulars of 1 pre-existing School Street.

Appendix 3 – Schools' catchment areas.

Appendix 4 – Method for operating a Schools Street.

Appendix 5 – Analysis of consultation questionnaires by individual schools.

Appendix 6 – Copy of informal engagement letter.

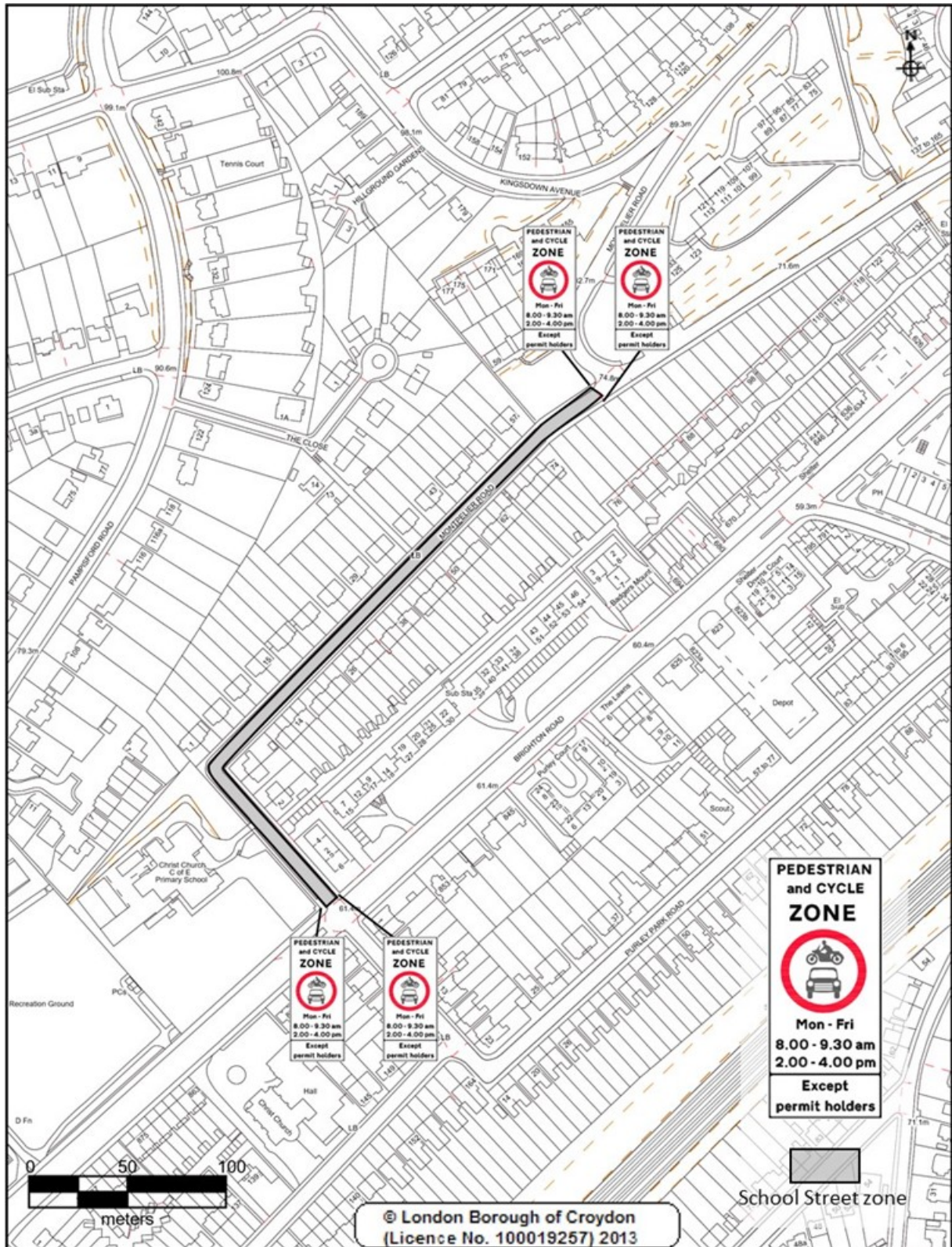
BACKGROUND PAPERS:

1. <https://www.croydon.gov.uk/transportandstreets/policies>
2. <https://www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities/traffic-management-act-2004-network-management-in-response-to-covid-19>
3. <https://tfl.gov.uk/travel-information/improvements-and-projects/streetspace-for-london>
4. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716075/vehicle-licensing-statistics-2017-revised.pdf
5. <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/birthsummarytablesenglandandwales/2017>
6. <https://www.sciencedirect.com/science/article/pii/S0048969701007586>
7. <https://www.mumsforlungs.org/resources>
8. <https://democracy.croydon.gov.uk/documents/s17358/Equality%20Analysiss%20V3.pdf>

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APPENDIX 1

Christ Church CofE Primary School, CR8 2QE



CROYDON
www.croydon.gov.uk

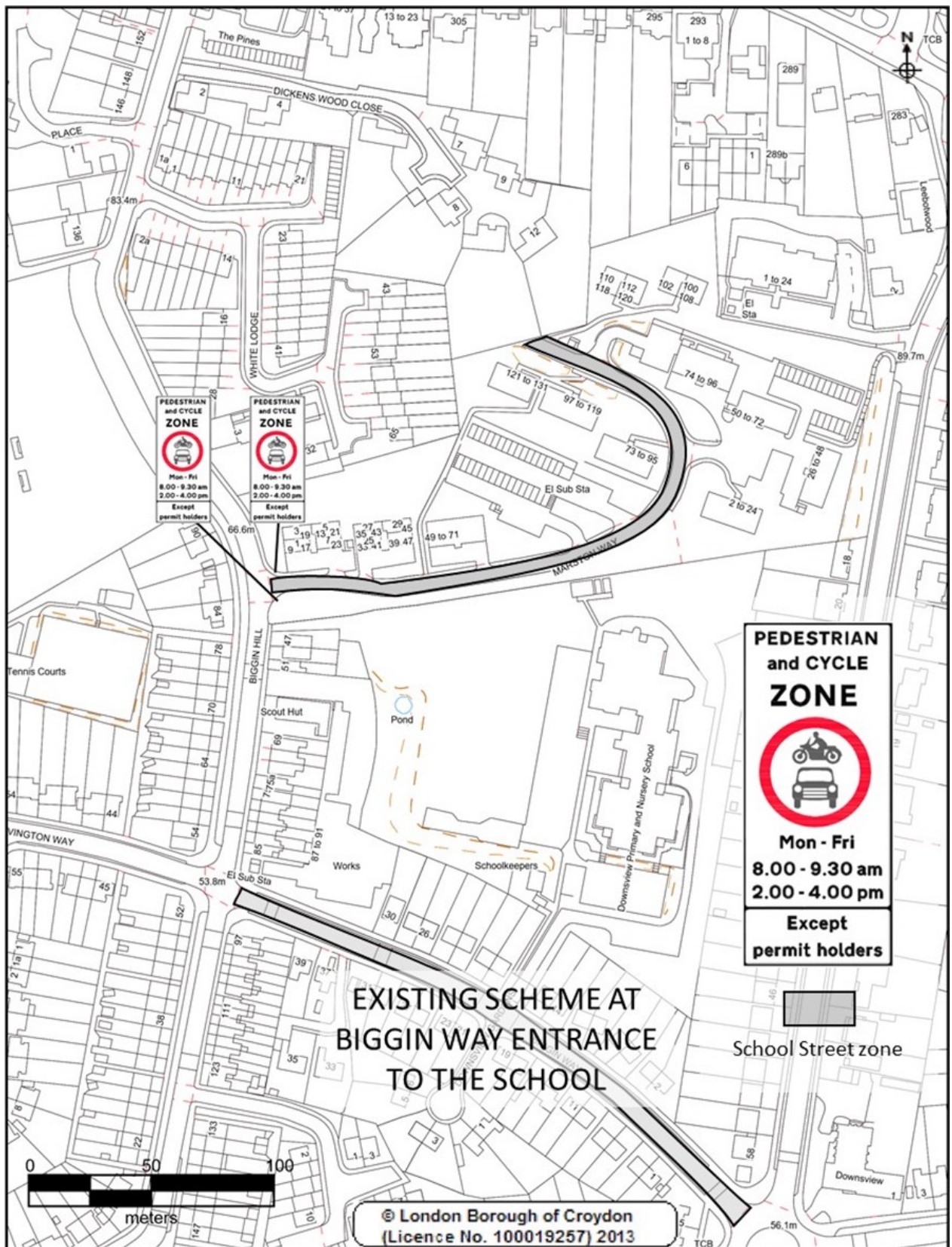
Crown Copyright Ordnance Survey (License No: 100019257) 2011

London Borough Croydon

Scale 1:2500



Downsview Primary School, SE19 3XE



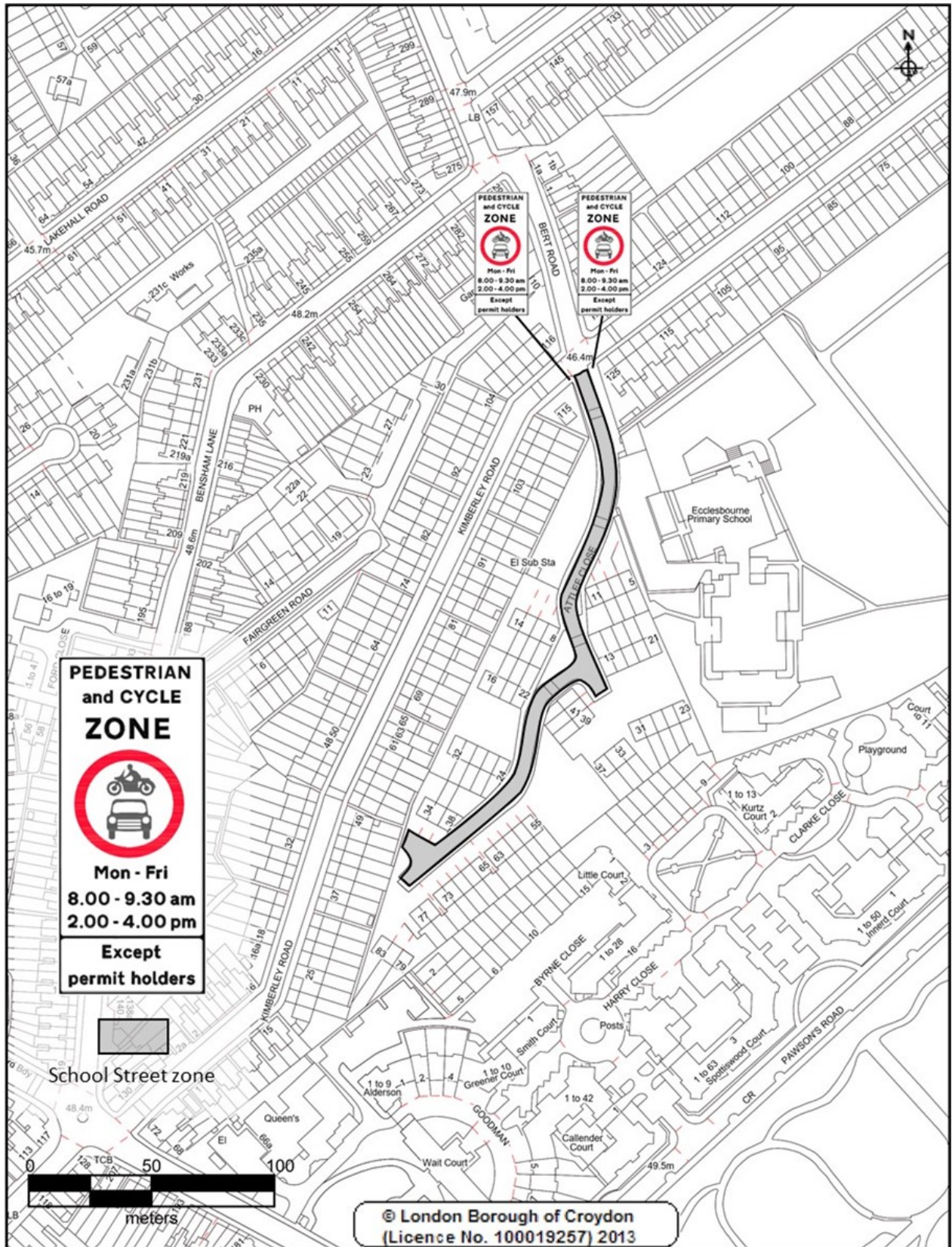
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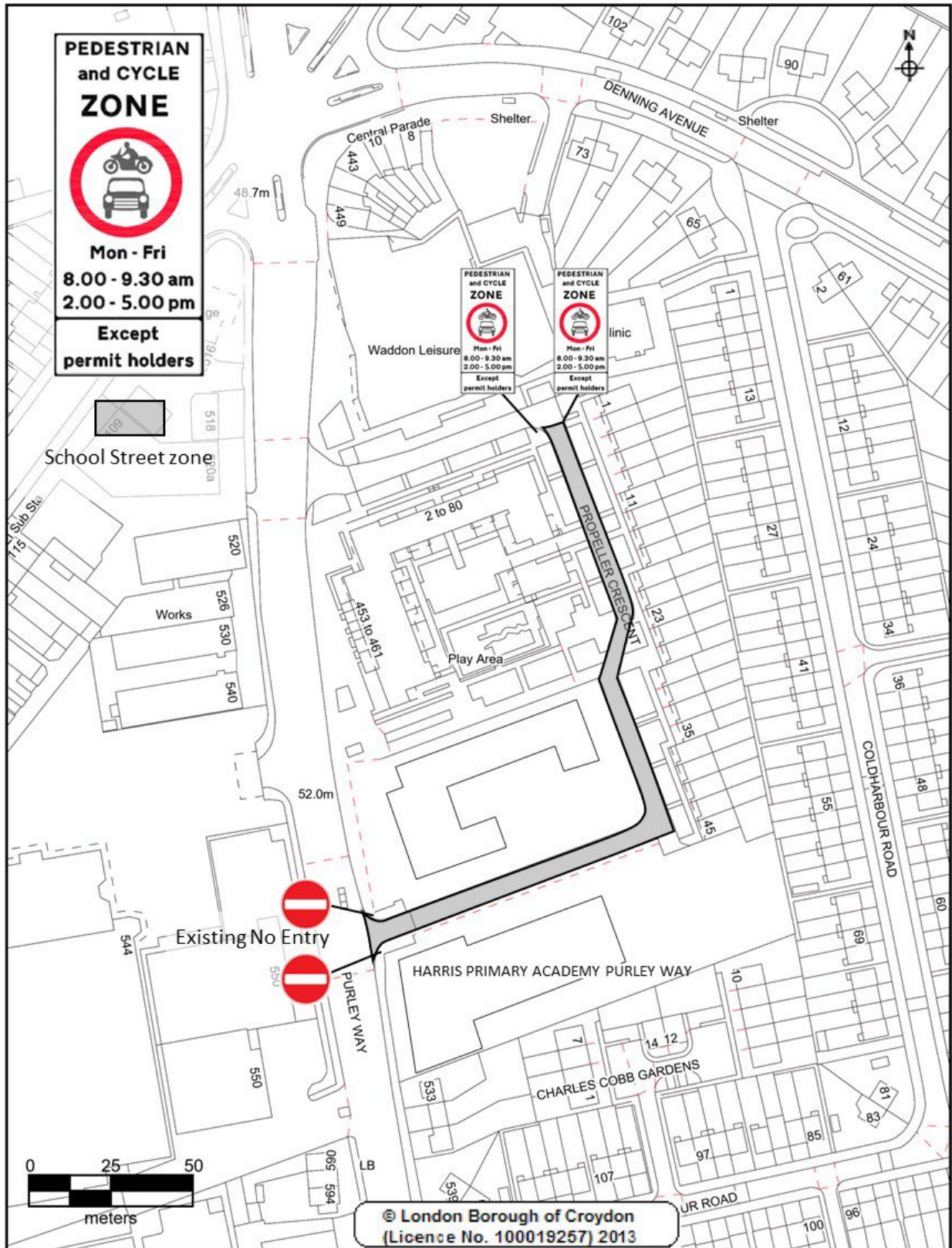
London Borough Croydon

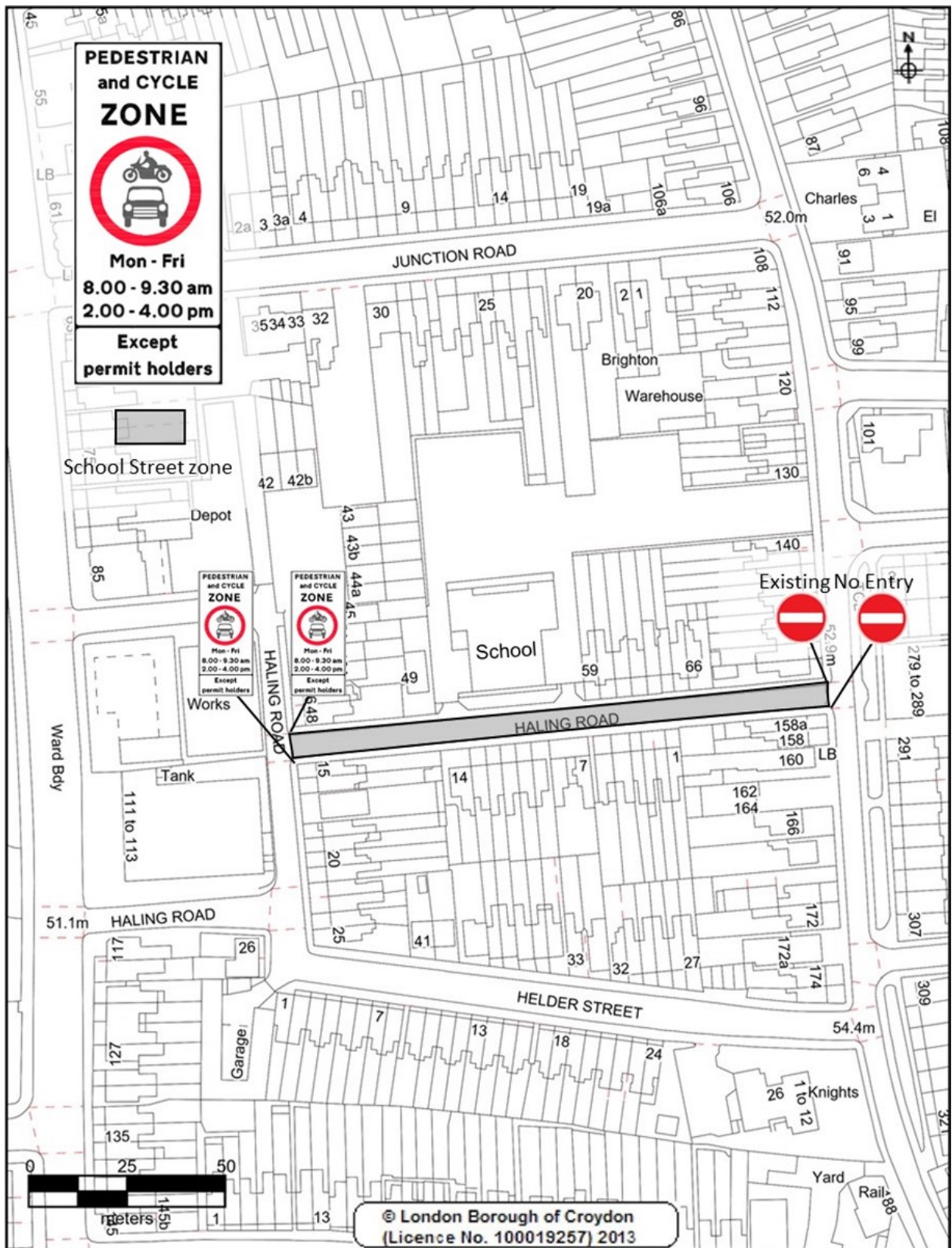
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NOT RECOMMENDED





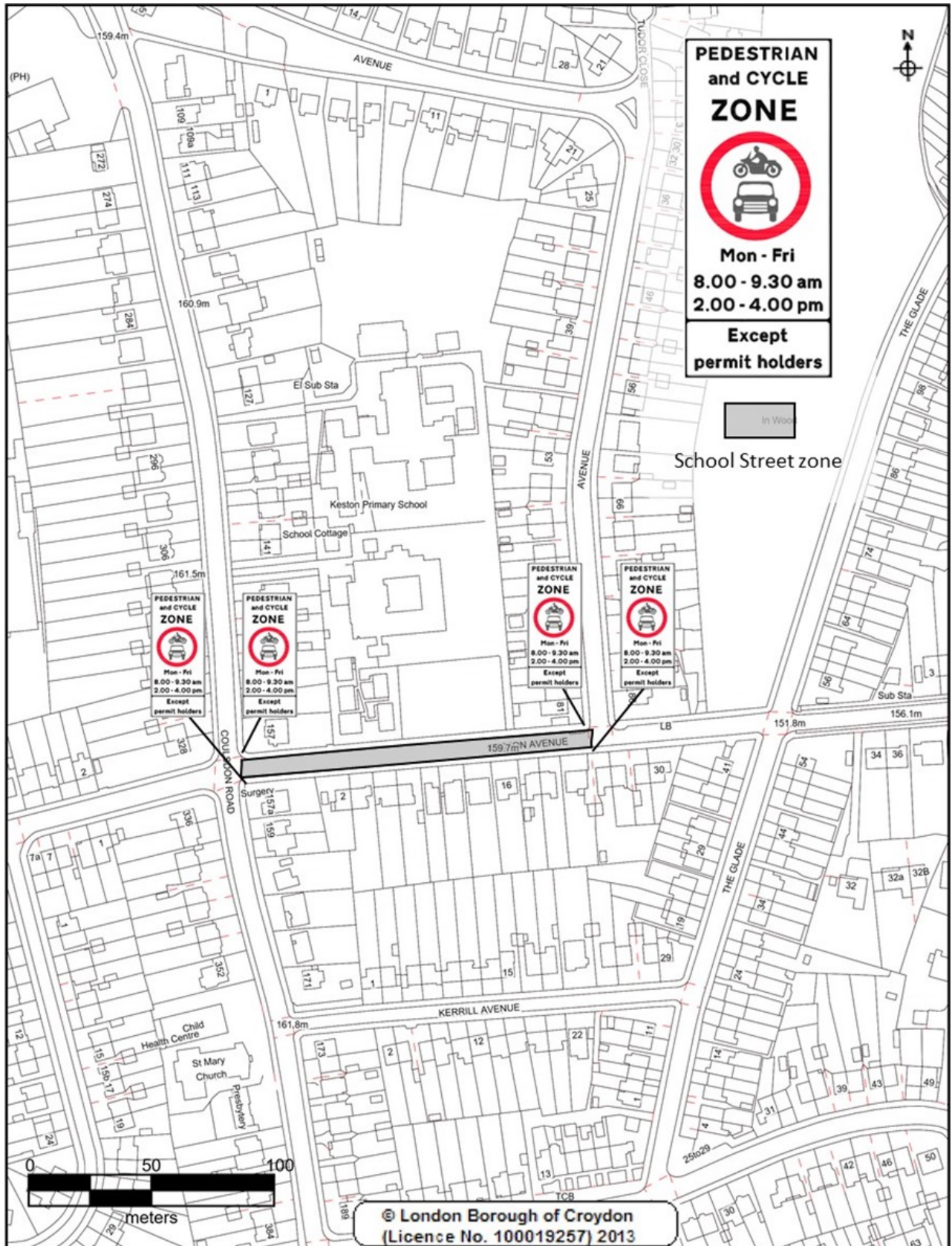
CROYDON
www.croydon.gov.uk

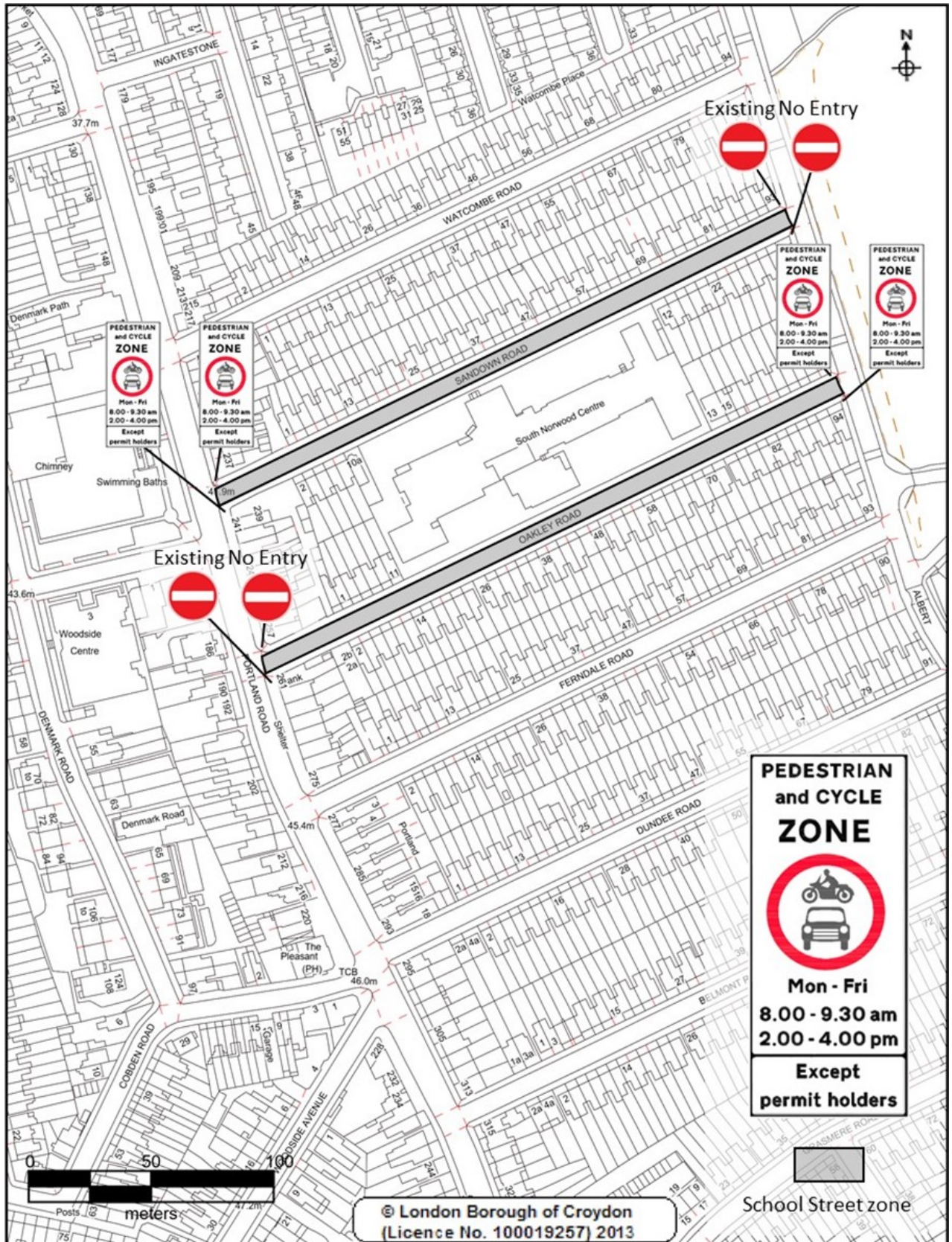
Crown Copyright Ordnance Survey (License No: 100019257) 2011

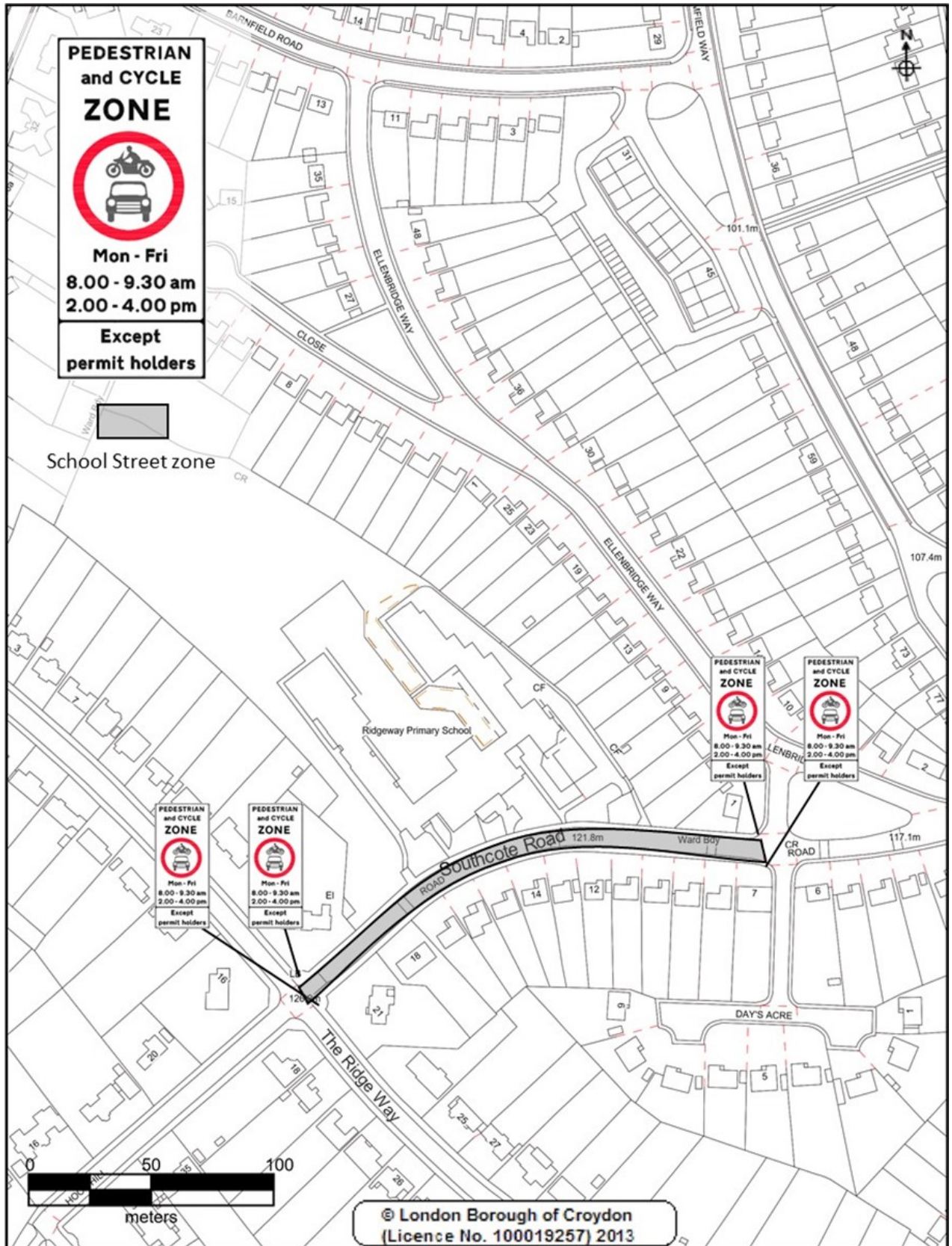
London Borough Croydon

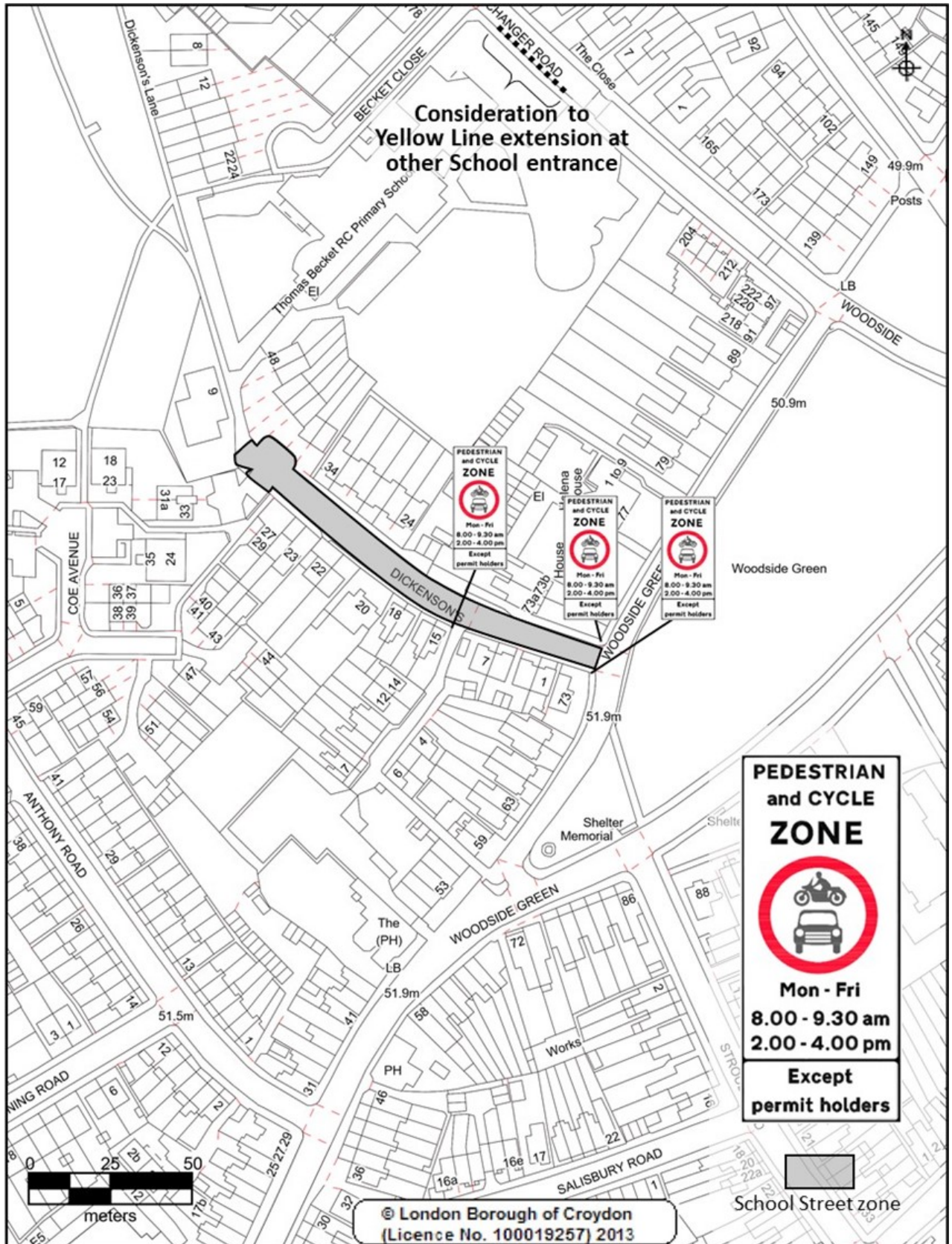
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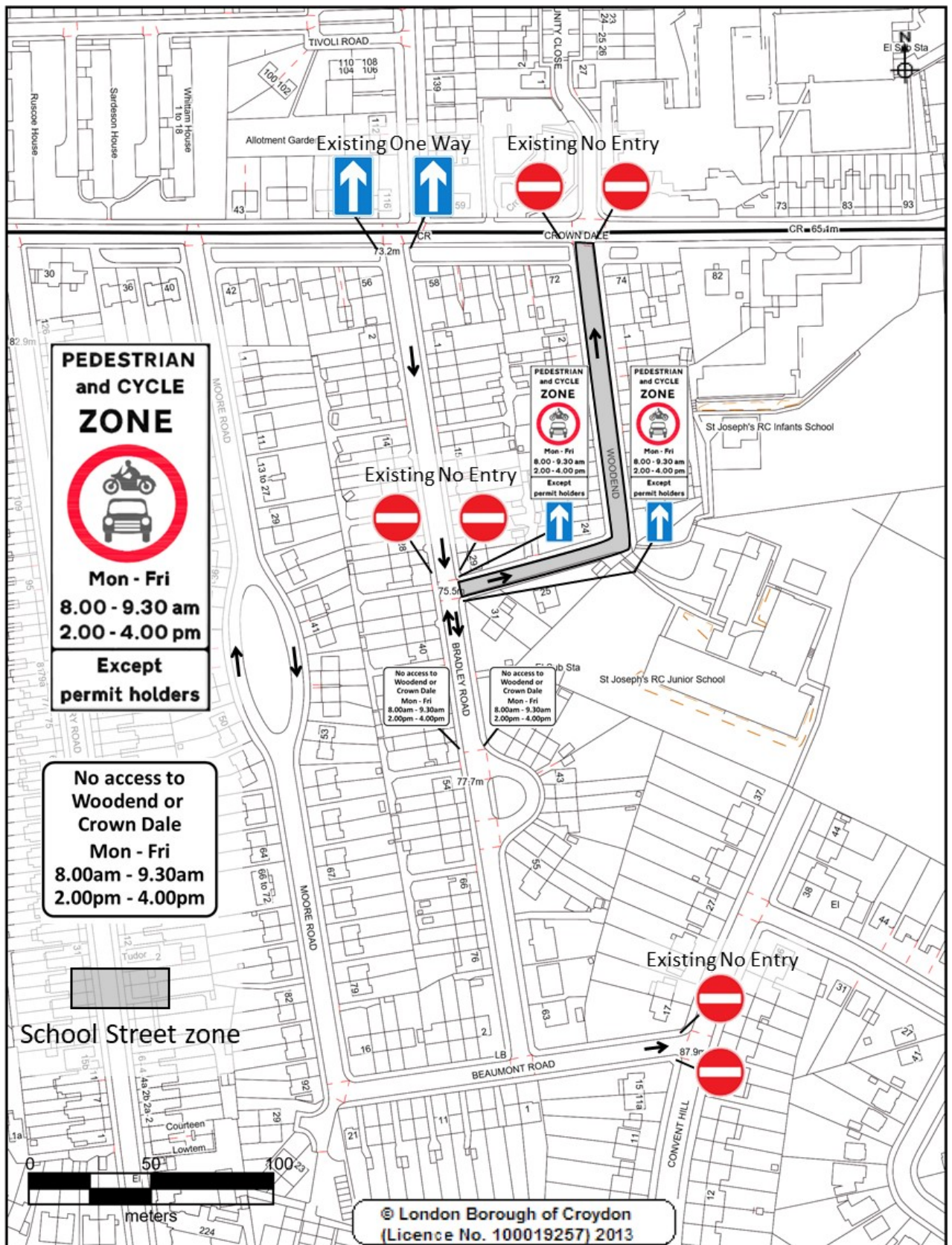






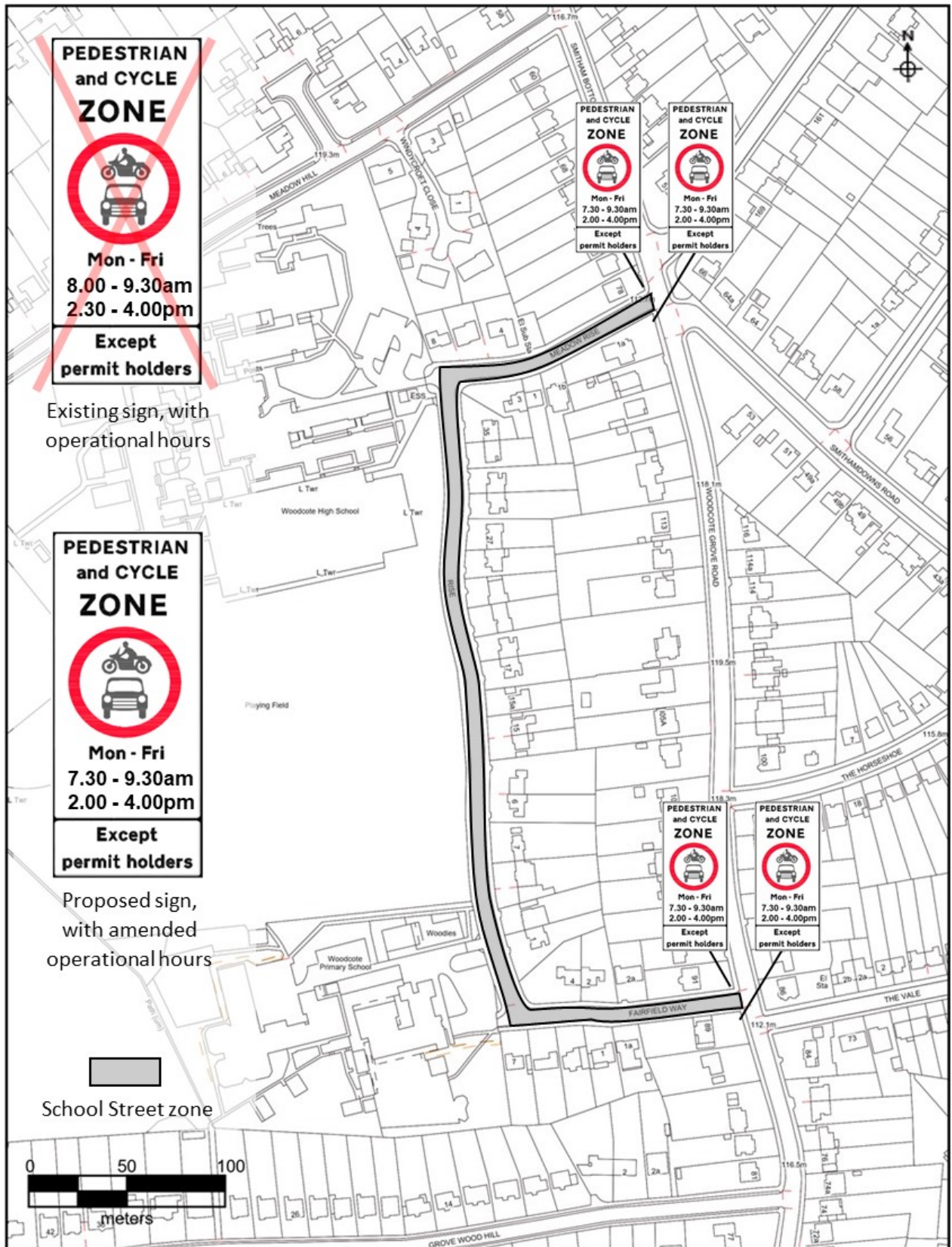






APPENDIX 2

Woodcote Primary and High Schools, amended operational hours at existing scheme



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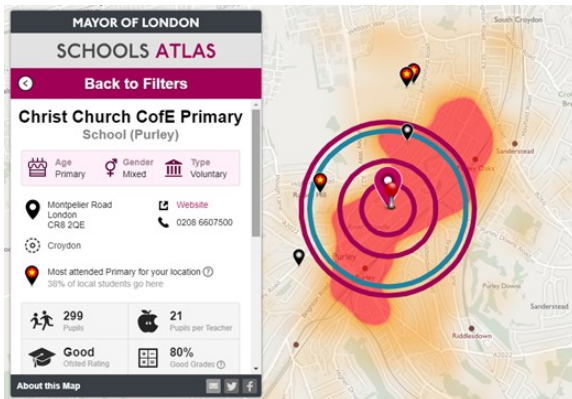
London Borough Croydon

Scale 1:2500

APPENDIX 3

Heat-maps of school catchment areas. The red areas show the highest concentration of pupils, whilst orange indicates that fewer students live there. The rings represents the 25, 50, 75 percentiles and the average (blue ring) distance areas. Maps are not to scale.

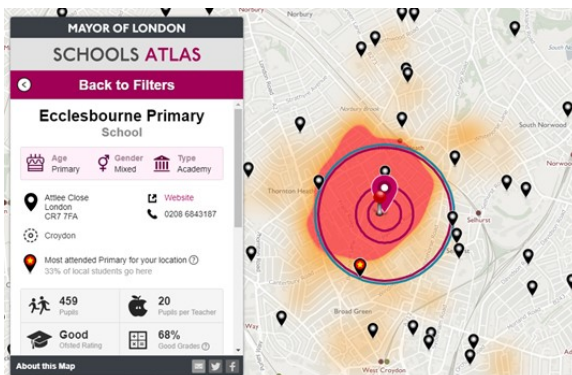
The maps are obtained from <https://maps.london.gov.uk/schools/>, which also has a tool for mapping the walking, cycling and driving times. There is no data available for the newly opened Harris Academy Purley Way and only partial data is available for Harris Academy Hailing Park.



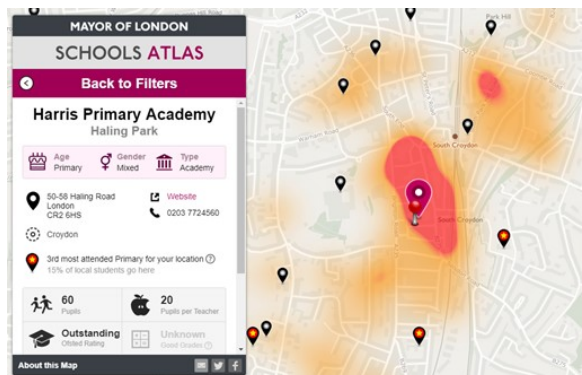
75% of pupils live within approx. 12min walking distance



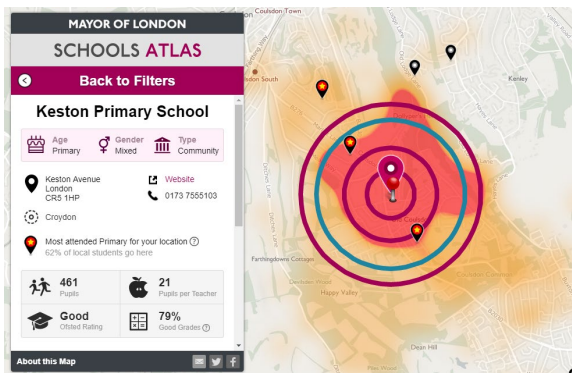
75% of pupils live within approx. 11min walking distance



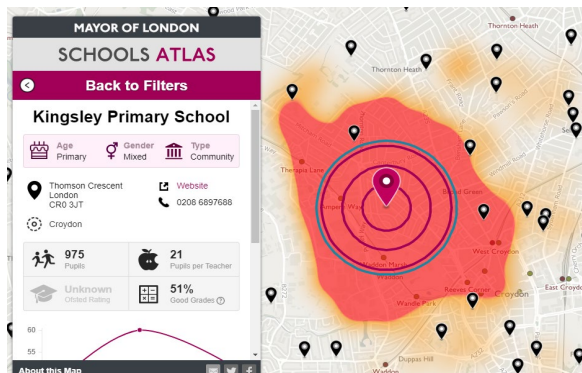
75% of pupils live within approx. 13min walking distance



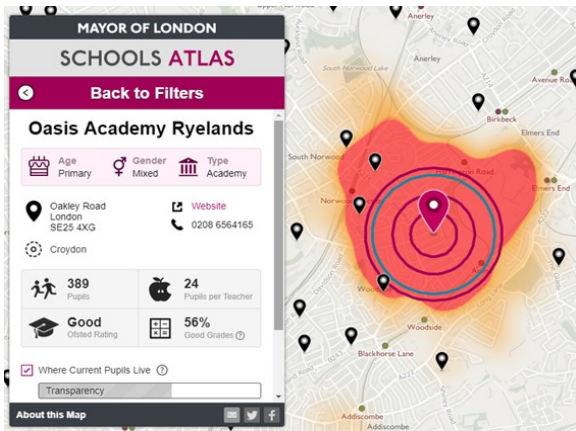
Distance data not available. The larger red area (highest concentration of pupils) is within 7min walk. The second smaller red area is 12min walk.



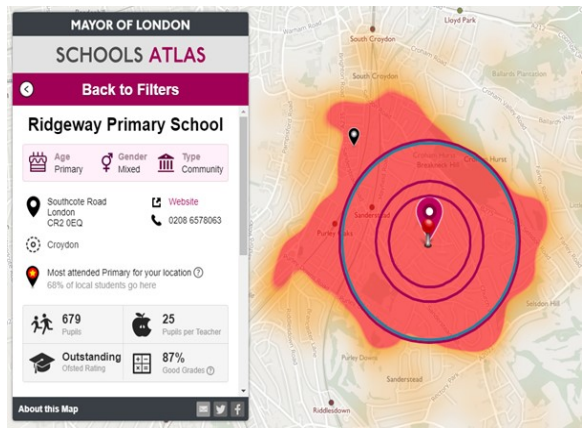
75% of pupils live within approx. 12min walking distance.



75% of pupils live within approx. 11min walking distance.



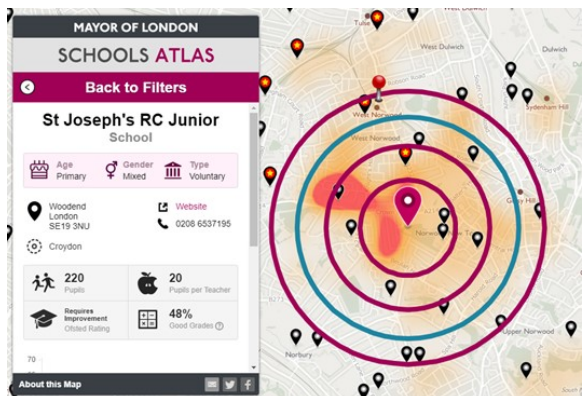
75% of pupils live within approx. 11min walking distance.



75% of pupils live within approx. 15min walking distance.



75% of pupils live within approx. 16min walking distance.



75% of pupils live within approx. 20min walking distance.

APPENDIX 4

OPERATION OF A SCHOOL STREET



The road signs and camera position at the entrance to the School Street.

Motor vehicles belonging to the following groups of drivers are eligible for an exemption permit, to enable them driving in the School Street during the hours of operation:

- a) Occupier within the zone, with a registered vehicle or a hire, company or courtesy car agreement.
- b) Vehicles used in the transport of children and adults with special access needs, including private vehicles, taxis and minicabs declared for such use.
- c) Business and school employees with allocated parking on their premises inside the zone.
- d) Essential health and care visitors, including relatives of residents with care needs.
- e) All day commercial operators, such as builders, decorators and heavy goods suppliers, are eligible for a temporary permit covering the duration of their necessary activities.

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. It is envisaged to eventually create an online exemption system with automated DVLA VQ5 validation, as opposed to manually processing emails, but this development is not yet justifiable for the relatively low number of exemptions in place and unconfirmed final number of School Streets.

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

- f) Emergency services.
- g) Statutory public services, such as gas/electricity companies and refuse collectors.
- h) Public transport busses (where on a bus route).
- i) Universal postal service providers, such as the Royal Mail.
- j) Breakdown and recovery vehicles (the so called 4th emergency service).
- k) Exemptions stated in the Highway Code, such as at the direction of a police officer.

Other drivers who wish to access the School Street must arrive outside the hours of operation, or they can temporarily park outside the zone and then move the vehicle once the restrictions end. The vehicles that are not eligible for a permit notably include those of:

- a) General visitors to residents and businesses.
- b) Home deliveries.
- c) Employees and school staff without on-premises parking (the scheme is not intended to free up the road to substitute for workplace parking).

A traffic camera with automatic number plate recognition (ANPR) and a contravention detection algorithm will operate during the controlled hours. To prevent false triggers and to permit a driver correcting a turning mistake, the alleged contravention trigger point is a small distance into the road. A qualified CCTV Enforcement Officer (CEO) will review a video recording of the context in which an alleged contravention has occurred and verify a picture of a driving car's registration number against the exemptions list. The CEO can issue a £130 Penalty Charge Notice (discounted to £65 if paid within 14 days) to the registered keeper of a vehicle that drives into the road without a valid exemption or reason. The penalty charge is set by a London-wide authority, to reflect a level deemed necessary in deterring driving contraventions and which is consistent with a requirement on the local authority to charge to recover the costs of implementing and operating such a scheme.

The fixed position ANPR camera is type approved by the Department for Transport and will focus strictly on the traffic entry point to the street. It cannot be turned or used for any other purpose, such as for observing private individuals or recording anti-social behaviour.

Operational procedures and enforcement assessment guidance are defined to help assure fairness:

- The compliance enforcement system is operated during school term time only and can include insert days that differs between the schools.
- To assure the triggering of a single enforcement action per driving contravention, the ANPR camera enforcement system is set to focus on vehicles driving into the zone. For example, a driver will not receive a second penalty charge notice when leaving the zone, several hours or days after entry.

There is no provision in traffic signs regulations for displaying the above two operating procedures; nor would it be workable to advertise them and consider representations on the basis of what a driver may or may not have perceived. For example, if a sign was to say "on schools days only", then a driver could rightly make representation on grounds that there is no information to indicate whether the particular day is a school day or not. It might also result in disputes over the number of children that were visibly present in the street at the time. The system would risk falling into disrepute and becoming unenforceable.

To fairly enable drivers realising the changing conditions in the street and to give them the opportunity to find another mode or route of travel, the scheme would not be enforced during its first month of operation. Instead, CEOs will show an advisory presence in the street and the surrounding area. Drivers will subsequently have the right to appeal any penalty, stating a legally valid reason for driving in the School Street.

APPENDIX 5

Responses data from informal consultation

All 11 school proposals			Opinions		
Distance	Letters	Responses	No	Yes	Unsure
Inside Zone	616	160	21	139	0
		26%	13%	87%	0%
Less than 100m outside	702	94	57	35	2
		13%	61%	37%	2%
More than 100m outside	1361	203	130	69	4
		15%	64%	34%	2%
Total	2679	457	208	243	6
		17%	46%	53%	1%

Keston Primary School			Opinions		
Distance	Letters	Responses	No	Yes	Unsure
Inside Zone	12	9	0	9	0
		75%	0%	100%	0%
Less than 100m outside	90	25	21	3	1
		28%	84%	12%	4%
More than 100m outside	234	56	37	17	2
		24%	66%	30%	4%
Total	336	90	58	29	3
		27%	64%	32%	3%

Christ Church CofE Primary			Opinions		
Distance	Letters	Responses	No	Yes	Unsure
Inside Zone	68	15	2	13	0
		22%	13%	87%	0%
Less than 100m outside	85	6	2	4	0
		7%	33%	67%	0%
More than 100m outside	142	8	4	4	0
		6%	50%	50%	0%
Total	295	29	8	21	0
		10%	28%	72%	0%

Kingsley Primary Academy			Opinions		
Distance	Letters	Responses	No	Yes	Unsure
Inside Zone	55	6	0	6	0
		11%	0%	100%	0%
Less than 100m outside	103	7	5	2	0
		7%	71%	29%	0%
More than 100m outside	196	22	15	7	0
		11%	68%	32%	0%
Total	354	35	20	15	0
		10%	57%	43%	0%

Downsview Primary School, Marston			Opinions		
Distance	Letters	Responses	No	Yes	Unsure
Inside Zone	126	20	5	15	0
		16%	25%	75%	0%
Less than 100m outside	26	4	3	1	0
		15%	75%	25%	0%
More than 100m outside	17	1	1	0	0
		6%	100%	0%	0%
Total	169	25	9	16	0
		15%	36%	64%	0%

Oasis Academy Ryelands			Opinions		
Distance	Letters	Responses	No	Yes	Unsure
Inside Zone	134	40	7	33	0
		30%	18%	83%	0%
Less than 100m outside	79	3	2	1	0
		4%	67%	33%	0%
More than 100m outside	193	26	20	6	0
		13%	77%	23%	0%
Total	406	69	29	40	0
		17%	42%	58%	0%

Ecclesbourne Primary School			Opinions		
Distance	Letters	Responses	No	Yes	Unsure
Inside Zone	52	13	4	9	0
		25%	31%	69%	0%
Less than 100m outside	80	2	1	1	0
		3%	50%	50%	0%
More than 100m outside	132	5	1	4	0
		4%	20%	80%	0%
Total	264	20	6	14	0
		8%	30%	70%	0%

Ridgeway Primary School			Opinions		
Distance	Letters	Responses	No	Yes	Unsure
Inside Zone	13	11	1	10	0
		85%	9%	91%	0%
Less than 100m outside	27	20	12	8	0
		74%	60%	40%	0%
More than 100m outside	158	56	36	18	2
		35%	64%	32%	4%
Total	198	87	49	36	2
		44%	56%	41%	2%

Harris Academy Purley Way			Opinions		
Distance	Letters	Responses	No	Yes	Unsure
Inside Zone	64	8	0	8	0
		13%	0%	100%	0%
Less than 100m outside	14	0	0	0	0
		0%	0%	0%	0%
More than 100m outside	54	3	1	2	0
		6%	33%	67%	0%
Total	132	11	1	10	0
		8%	9%	91%	0%

St Joseph's Catholic Junior School			Opinions		
Distance	Letters	Responses	No	Yes	Unsure
Inside Zone	26	11	0	11	0
		42%	0%	100%	0%
Less than 100m outside	53	15	7	8	0
		28%	47%	53%	0%
More than 100m outside	153	18	10	8	0
		12%	56%	44%	0%
Total	232	44	17	27	0
		19%	39%	61%	0%

Harris Primary Academy Hailing Park			Opinions		
Distance	Letters	Responses	No	Yes	Unsure
Inside Zone	27	14	1	13	0
		52%	7%	93%	0%
Less than 100m outside	98	9	3	5	1
		9%	33%	56%	11%
More than 100m outside	27	1	0	1	0
		4%	0%	100%	0%
Total	152	24	4	19	1
		16%	17%	79%	4%

St Thomas Becket Catholic Primary			Opinions		
Distance	Letters	Responses	No	Yes	Unsure
Inside Zone	39	13	1	12	0
		33%	8%	92%	0%
Less than 100m outside	47	3	1	2	0
		6%	33%	67%	0%
More than 100m outside	55	7	5	2	0
		13%	71%	29%	0%
Total	141	23	7	16	0
		16%	30%	70%	0%

APPENDIX 6



Parking Services
P O Box 1462
Croydon
CR9 1WX
Tel/Typetalk: 020 8726 6000
Minicom: 020 8760 5797

The Occupier
«Address1»
«Address2»
«Address3»
«Address4»

Contact: Parking Services
frede.jensen@croydon.gov.uk
Tel: 020 8726 6000, ext 88003
Our Ref: PS/FJ/P781
Date: 5 February 2020

Important Traffic and Parking Questionnaire

Dear Occupier,

Possible School Street scheme in Montpelier Road

I am writing to ask for your views on the possibility of introducing a School Street scheme in Montpelier Road later in 2020.

It is suggested to designate the street a pedestrian and cyclist zone at the start and end of school days, as it is shown in the enclosed drawing. Residents and occupiers within the zone would become eligible for an exemption permit, to enable them drive in the road unhindered at any time.

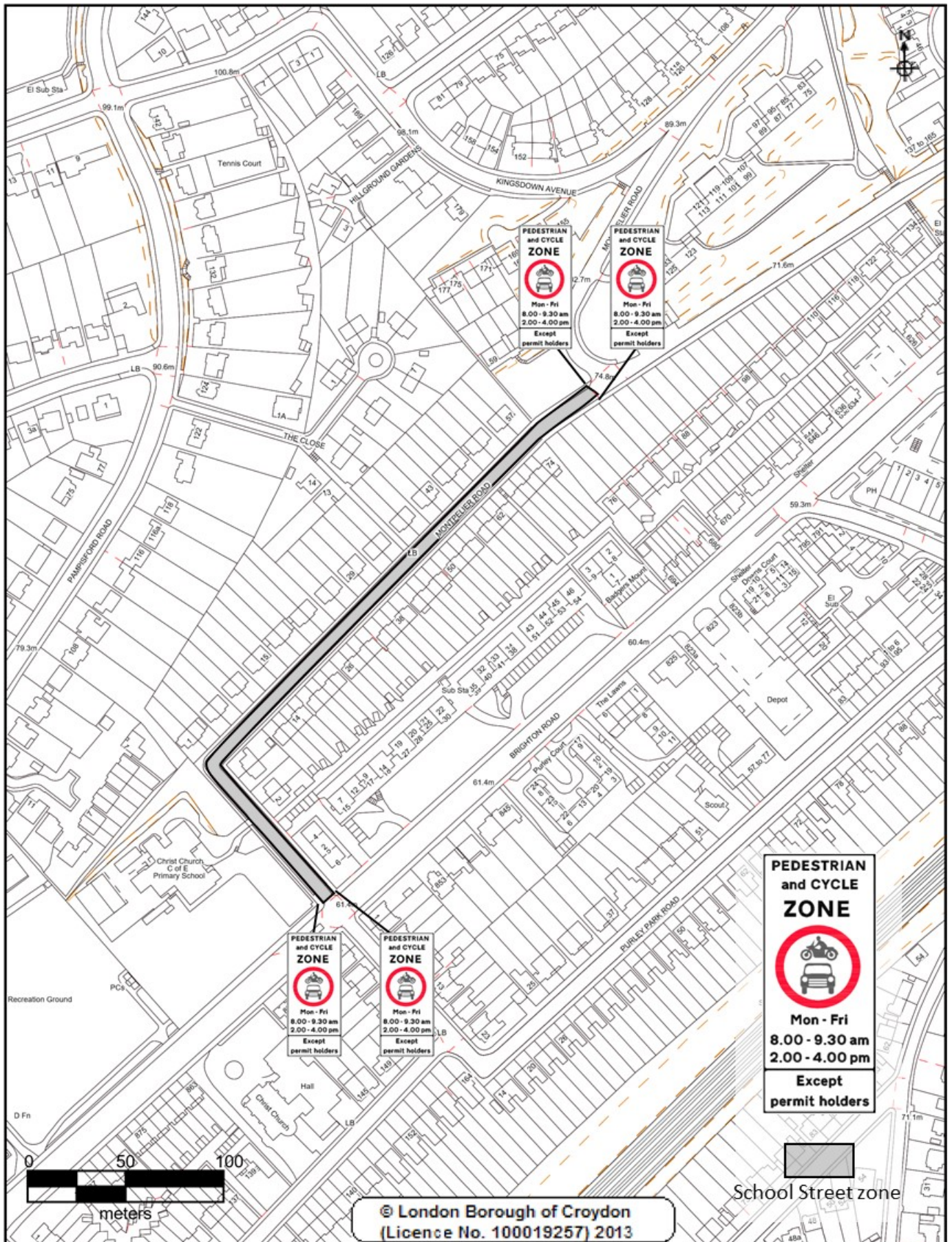
The feedback you provide in response to this informal engagement will assist the decision whether to develop a formal proposal for a statutory public consultation. Your views are important and we would be grateful if you could respond to the attached questions by email to **schoolparking@croydon.gov.uk** or by post to the above address by **Wednesday 26th February 2020**.

Before completing the questionnaire you may wish to look at the enclosed Frequently Asked Questions sheet.

Please let me know if you require further information or clarification.

Yours faithfully,

Frede Jensen
Project Manager



School Street Consultation – QUESTIONNAIRE – Montpellier Road

Please ensure you complete and return this questionnaire by email or post to reach us by Wednesday 26th February 2020.

You may scan or photo/picture copy as an attachment or simply write an email in equivalent statements (without attaching this questionnaire).

Name*

Address*

** Without this information your views will not be counted. This information will be used only for the purpose of validating this consultation. One response per household.*

Are you in favour of introducing a School Street as shown in the drawing?

Please choose **one** option only by putting an 'X' in the appropriate box.

Yes, traffic restriction at start and end of school day is needed

No, traffic restriction at start and end of school day is not needed

Whether you answered 'Yes' or 'No' above, please provide any comments that you wish to contribute to the decision process for developing a proposal for the suggested scheme. Continue on the reverse if necessary.

Comments:

School Street – Frequently Asked Questions

1. What is a School Street?

In present context, it is a street with a school entrance, which is restricted to use by pedestrians and cyclists, with most motor vehicle traffic prohibited, between the hours of 08:00 to 09:30 and 14:00 to 16:00 on weekdays. In accordance with the Highway Code for the School Street signs, the restriction applies to the act of driving into the road during the stated hours. Vehicles arriving outside these hours will be permitted to remain parked in the road and can drive out of the road at any time. In practice, the restrictions are not enforced during school holidays. Exempted vehicles can drive in the road at all times.

2. Why is the Council considering this?

The School Street is proposed, firstly, in response to requests for something to be done about obstruction, safety and air pollution concerns from the high volume of traffic and parking at school times. Many journeys previously considered easy walkable are increasingly made by car. The London Mayor has made it an overarching policy that all local Councils must encourage children and parents to use cars less and to walk, cycle and use public transport more. This is supported by reducing the amounts of traffic and parking near to the school entrance. The opening of a School Street will coincide with additional road safety and travel training for children at the school, and information to parents.

3. What have people reported from similar schemes in other places?

The Council introduced the first School Street schemes in 2017. Follow-up surveys show that the schools and residents inside the zones remain in favour of the schemes and that significantly more children now walk to school. Concerns have been raised about the displacement of the residual car travel, with some school children now being dropped-off and picked-up in neighbouring roads. This effect is reduced in amount and is dispersed over a wider area. School parents have needed time to become influenced and find alternative arrangements to their usual car journey.

4. What is the difference between informal engagement and statutory consultation?

The Council engineers have already assessed that the requested School Street scheme might be feasible. The current informal stage of engagement is intended to gauge the first-hand opinions of people who reside within and immediately outside the proposed zone, to help decide upon and design a proposal in more detail. The Traffic Management Advisory Committee (TMAC) of elected councillors will then review the detailed proposal, together with the opinions in support and in opposition to the scheme.

If it is agreed to proceed further, a subsequent formal stage of consultation is conducted in accordance with the legal obligation on the Council to issue a statutory Public Notice and to allow a time for receiving objections from the wider public and public services authorities. The outcome of a statutory consultation is reported back to the TMAC for final consideration, before a scheme is finally decided upon.

5. Where will the scheme operate?

It is presently suggested to place signs at the entrance to the School Street as is shown on the associated drawing. The current engagement is open to comments or petitions for changes to this suggestion. Beware, it would only be possible to establish zone start and

end points at appropriate road junctions, to present drivers with a realistic opportunity to select an alternative route and to avoid leading them into a road where they would be forced to make difficult and potentially hazardous U-turns.

6. What if I need to drive my car in the street during the restricted hours?

Motor vehicles belonging to the following groups of drivers are eligible for an exemption permit, to enable them driving into the School Street during the hours of operation:

- Occupier within the zone, with a registered vehicle or a hire, company or courtesy car agreement.
- Vehicles used in the transport of children and adults with special access needs, including private vehicles, taxis and minicabs declared for such use.
- Business and school employees with allocated parking on their premises inside the zone.
- Essential health and care visitors, including relatives of residents with care needs.
- All day commercial operators, such as builders, decorators and heavy goods suppliers, are eligible for a temporary permit covering the duration of their necessary activities inside the zone.

The exemption permit is simply an electronic record in the compliance system and there is no need to physically affix anything to a vehicle.

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

- Emergency services.
- Statutory public services, such as gas/electricity companies and refuse collectors.
- Universal postal service providers, such as the Royal Mail.
- Breakdown and recovery vehicles (the so called 4th emergency service).
- Exemptions stated in the Highway Code, such as at the direction of a police officer.

7. What about our visitors?

Other drivers who wish to access the School Street must arrive outside the hours of operation, or they can temporarily park outside the zone and then move the vehicle once the restrictions end. The vehicles that are not eligible for a permit notably include those of:

- General visitors to residents and businesses.
- Home deliveries.
- Business and school employees without access to on-premises parking (the scheme is not intended to free up the road to substitute for workplace parking). It is pragmatically accepted that on-site parking facilities may occasionally create an over-spill into the public road.

8. How much will an exemption permit cost?

The permit is free (£0.00) and requested by email to schoolparking@croydon.gov.uk.

9. Can you guarantee me a parking space outside my house?

It is not possible to guarantee anyone a particular space on the public highway.

10. How can it be ensured that motorists driving in the School Street zone are entitled?

A traffic camera with automatic number plate recognition (ANPR) and a contravention detection algorithm will operate during the controlled hours. To prevent false triggers and

to permit a driver correcting a turning mistake, the alleged contravention trigger point is a small distance into the road. The Penalty Charge Notice is £130 (discounted to £65 if paid within 14 days) and issued to the registered keeper of a vehicle. This penalty charge is set by a London-wide authority, to reflect a level deemed necessary in deterring driving contraventions. Drivers have the right to appeal any penalty, stating a legally valid reason for driving in the School Street.

To fairly enable drivers realising the changing conditions in the street and to give them the opportunity to find another mode or route of travel, the scheme would not be enforced during its first month of operation. Parking enforcement officers would show heightened presence in the surrounding area.

11. What about my privacy when using the street?

Every individual ANPR camera has a Privacy Data Protection Impact Assessment (DPIA), which is registered with the Information Commissioner's Office. The fixed position ANPR camera is type approved by the Department for Transport and operates within the Surveillance Commissioners Codes of Practice. The ANPR camera is operated in a way that does not constitute surveillance and does not interfere with rights granted under the European Convention on Human Rights (ECHR). The camera focuses strictly on the traffic entry point to the street. It only uploads a short recording when a driving contravention is detected. All permitted traffic movements are not registered or recorded. The camera cannot be turned or used for any observation purpose.

12. What if I do not support the introduction of a School Street?

Tick the 'No' box on the enclosed questionnaire. If the school and the majority of residents in the road are against a scheme then it is unlikely to go ahead. It would be helpful if you stated why you oppose the proposal. If the majority is in favour of a scheme then there may still be opportunity to make amendments and address any concerns. If it is decided to proceed and develop a formal proposal, then there will be opportunity to object with comments to this formal proposals at a later Public Notice stage.

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