

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 proposed 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.
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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>
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