



Overview and Scrutiny Committee 03/12/2019

Subject Heading:	School Parking Safety Measures
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Policy context:	Keeping Havering Moving
Financial summary:	There is a capital cost for the set-up of a PSPO plus ongoing revenue cost of 1fte. There is a capital cost for the set-up of school streets plus 0.25fte

The subject matter of this report deals with the following Council Objectives

Communities making Havering	[x]
Places making Havering	[x]
Opportunities making Havering	[]
Connections making Havering	[x]

SUMMARY

This report outlines the parking issues around schools and the potential solutions which can be explored by the Council to resolve them.

RECOMMENDATIONS

To consider the proposals and provide comments for consideration.

REPORT DETAIL

1.0 Introduction

Havering Council has a vision for transport as engine for economic growth, but one that is sustainable, safe, and improves quality of life in our communities.

Havering has over 60 primary schools in the borough. Primary schools are the focus of this safety document as primary aged children are accompanied by parents to and from the school gate.

Incidences of dangerous, careless, and irresponsible parking, driving, and manoeuvring in areas around many schools has reached a level that there exists a very real danger to the well-being of pupils, carers taking them to and from school, local residents, and other users of public highway.

The situation has already become such that residents and others have been subjected to levels of anti-social behaviour and conduct that has caused them to suffer harassment, alarm, and distress.

Furthermore, the conduct of some has inflicted upon local residents great nuisance and annoyance, which in turn has caused some residents to feel vulnerable and unsafe in their homes and local environment during 'school-gate' times 'school-run' motor vehicles make up a quarter of morning traffic in London.

Four in 10 children in London are considered to be overweight, and eight in 10 do not achieve the minimum recommended one hour a day of physical activity. Alongside other initiatives to encourage walking, cycling, and tackle obesity, Havering council aims to make schools as inviting as possible for those who want to get there by bike or on foot.

From 2006 to 2011 there were 85,814 child injuries on UK roads within a 500-metre radius of a school. To improve safety Council can enforce measures in streets outside schools during opening and closing times. This Policy sets out evidence for Council to consider before introducing restrictions to regulate car parking, waiting, stopping, dropping-off or picking-up around schools.

This proposed policy outlines control options Council officers consider when assessing danger to pedestrians and cyclists in the vicinity of schools.

Types of formal controls available to Council;

- Public Space Protection Order
- School Street Zone by Traffic Order
- Parking and Waiting restriction by Traffic Order
- Restricted speed 20mph zone by Traffic Order
- School Keep Clear restriction

2.0 Available Control Measures

2.1 Schools Public Space Protection Orders (PSPO)

School PSPOs target driver behaviours near schools. Public Space Protection Orders (PSPO) exist in streets outside 4 Havering schools using powers under the Anti-social Behaviour Crime and Policing Act 2014ⁱ (ASBCP) part 4 chapter 2.

Restrictions apply between 8am and 9.30am and between 2.30pm and 4pm on school days only, which is in line with some other types of restriction for schools.

Conventional civil parking enforcement legislation alone is occasionally not of sufficient authority and flexibility to address the breadth and depth of issues being encountered and therefore an alternative approach is required. The below section of the act allows the enforcement of a particular activity around schools.

'Part 4 chapter 2 of the Anti-Social Behaviour, Crime and Policing Act 2014 (c.12) to issue, maintain and enforce the provisions of Public Spaces Protection Orders.'

The restriction allows the enforcement of any vehicle seen stopping to drop-off or pick-up pupils within the zone during these 'school-run' hours can be recorded by cameras, and Fixed Penalty Notices of £100 issued, with exemptions for known vehicles such as disabled people and school buses.

PSPO restrictions also address;

- (a) Vehicles being driven on the pavement
- (b) Obstruction of residential driveways and dropped curbs
- (c) Obstruction of the highway resulting in congestion
- (d) Hazardous parking preventing pupils crossing roads safely
- (e) Parking of vehicles on school keep clear markings where applicable
- (f) Parking of vehicles on areas with restricted parking to ensure safety of school pupils

Virtual permits by 'whitelist' are used for exempt vehicles.

Enforcement can be by an appropriately trained enforcement officers, a CEO trained for PSPO or by camera and is based on vehicle registration number VRN. Fixed Penalty Notices FPNs are issued. (The FPN process differs from normal PCN parking tickets, particularly in the way customers can appeal against the Notice. There is no discount period with FPN. Also, any revenue is accounted for differently.)

Criminal records can result after non-payment of fines.

Positives

- Very effective at changing behaviours

Negatives

- Separation of PSPO enforcement from parking enforcement proved easier to administer than joint enforcement, although the behaviour issues can be similar.
- The challenge process includes a PACE interview, which the Parking staff are unaccustomed to
- No other boroughs in London have PSPO for this purpose

2.2 School Streets

There are no school streets in Havering as of November 2019.

A trial is proposed for Benjamin Close by Hylands Primary School in 2020 which will be funded by LIP.

School Streets have been used to increase the number of children choosing active transport modes to get to and from school, and reduced car use in other London boroughs and in Edinburgh.

Aims:

- Reduce the volume of vehicles using roads past school gates, both school-run and through traffic;
- Improve air quality in and around school gates;
- Increase the number of pupils walking and cycling to school; and
- Reduce the number of pupils arriving at the school gate by car

Restrictions will apply between 8am and 9.30am and between 2.30pm and 4pm on school days only. Effectively a pedestrian and cycling zone is created. Non-resident vehicles are prohibited from entering the zone, with exemptions for a few known vehicles such as disabled people and school buses via a white list. Enforcement can be by camera based on VRN entering the zone therefore a physical patrol is not required to enforce the restriction. PCNs are issued, and the normal Challenge process followed. Safety improvement results elsewhere have been similar to Havering PSPO.

Schools Streets in Hackney have so far:

- reduced congestion in school streets at school opening and closing times;
- improved road safety and accessibility for those walking and cycling;
- encouraged active travel to school for children, parents and staff; and,
- reduced air pollution at the school gates.

Positives

- vehicle presence is targeted which is effective
- Most other boroughs issue PCN, the challenge process exists, and is straightforward for council Parking
- Can be more cost effective as fewer cameras are needed as only entry points to the zone need camera cover

Negatives

- Targets vehicles movements and parking rather than driver behaviours, such as driving on a footway or dropping off children on a yellow line
- vehicle presence is targeted, so junctions are often not included, which means that pedestrian movements at the junctions is constrained and some vehicles may drop-off at junctions despite restriction markings on roads without penalty

2.3 Other Traffic Order restrictions

Parking around schools can be controlled by the implementation of a controlled Parking Zone (CPZ) which prohibits the parking of vehicles not displaying a valid permit during the operational hours of the control. Controls can also be introduced by a single yellow line which works similar to that of a CPZ except that all vehicles, including residents are prohibited from parking during the prescribed hours.

Both of these methods of controlling and managing parking can only be enforced by the way of a Civil Enforcement Officers (CEOs) who would have patrol the area in question by foot. The issue with this type of enforcement is that all schools in the borough require enforcement at the same time therefore it is unlikely that a school with these types of restrictions will receive enforcement on a twice daily basis.

Restriction by Traffic Orders under the Traffic Management Act 2004ⁱⁱ (TMA) include;

- Controlled Parking Zones CPZ such as Havering Road Romford,
- Parking restriction yellow lines

Generally enforcement is by CEO, and PCNs are issued.

Positives

- Most other boroughs issue PCN, the challenge process exists, and is straightforward for council Parking
- Cheaper than other options, both capital and operation

Negatives

- Require CEO presence
- Residents are required to purchase a permit during the restricted hours for CPZs.
- Single yellow lines prohibit parking for all vehicles including resident vehicles.

2.4 Other options

School Crossing Patrols provide the best service for pedestrians crossing busy roads.ⁱⁱⁱ

School Keep Clear lines SKC do not require an Order, and enforcement can be by camera based on Vehicle Registration Number.

In 2017-18 streets outside Havering infant, junior, and primary schools were reviewed by Traffic and Parking Control's Schemes Team to ensure fully compliant and enforceable school keep clear SKC markings at main entrances.

To encourage safe crossing of streets, **pedestrian refuges** (informal) and **pedestrian crossings** may be considered. Formal road crossings that interrupt traffic flow (pedestrian and pelican crossings) usually have stopping and loading restrictions several metres before the crossing, which can deter some unsafe behaviour by drivers.

Speed tables and **speed humps** may be effective near informal crossing points.

20mph zones

A 20mph speed limit is safer than 30mph for roads where space is shared. A person walking who is hit by a vehicle travelling at 30mph is up to five times more likely to be killed than if they were hit at 20mph; hence the requirement for these zones.

Figures from 2016, 2017 and 2018 (provisional) suggest that 128 people were killed in speed-related collisions on London's streets in three years. A further 2,256 people were seriously injured where speed was a contributory factor. It is unacceptable that so many Londoners are being killed and seriously injured in speed-related collisions on our roads and we need to do more to prevent these from happening.

The Department for Transport suggests that streets that are self-enforcing, such as 20mph zones, are the most successful way to achieve compliance with lower speed limits. The look and feel these roads are designed to be self-enforcing often meaning they're more welcoming places for people to walk and cycle safely.

Park and Stride (promoted by Living Streets and Brighton council)

These are good for families that live a long way from school and can't walk the whole way.

1. Parents / carers find a suitable and safe parking spot away from the school gates, and they walk the rest of the way.
2. Schools can also choose P&S parking points, perhaps in car parks that are not busy at school-gate times. This makes it as easy for parents to take part, especially if there is a shortage of places to park around school. It's also a great opportunity for parents and their children to meet with others, walk together, and chat.

Council is seldom involved in the administration of this option.

Walking bus

Children walk all or some of the way to school with other pupils in a semi-formal group.

Usually high visibility jackets are worn.

Children benefit through exercise and learning important road safety.

Parents save time on taking children to the school each day.

Council is seldom involved in setup or administration.

Specific Request for **Streetcare**

Occasionally vegetation and foliage cause sightlines and similar to be compromised.

Signs to inform drivers that pass a school of the existence of the school may be compromised which is to be rectified as soon as notified.

All school highway signs on columns are to be fitted.

3.0 Benefits

Healthier Children

- Active school travel helps school-aged children meet the recommendation of at least 60 minutes per day of moderate to vigorous physical activity.
- Active school travel is associated with mental health benefits including reduced
- stress, depression and anxiety; as well as increased happiness.
- Reduces childhood obesity

Less Traffic and Pollution

Reducing the number of children being driven to school reduces particulate air pollution around the school; this improves air quality and reduces associated risks of lung and cardiovascular diseases. For Havering the proportion of car journeys of all journeys to school is 21%.

Healthier and Safer Communities

Reducing traffic volumes creates safer school zones. Improving walking and cycling routes to school also enhances the safety, connectivity and quality of life for the community as a whole.

Better Academic Performance

- The increased physical activity specifically associated with the school journey has been found to increase alertness and attention during the school day.
- Physical activity supports healthy brain development, which can lead to improved learning and academic outcomes.

3.0 Questions to consider

- Should the council be more proactive in its approach to resolving parking issues around schools?

- Should the council develop and adopt a policy on its approach around school parking?
- It is suggested that the school should demonstrate its commitment to resolving issues, for eg have a gold star for its school travel plan, should we push some responsibility back to the school?
- Should we consider more enforcement of school keep clears by fixed cameras?
- Should we monitor hot spot locations for air pollution and use this data to score the worst schools?
- Is it enough to deal with school parking issues on a case by case basis and to not adopt a policy?

IMPLICATIONS AND RISKS

Financial implications and risks:

PSPO set up costs will vary depending on the area and number of cameras, costs can be up to £0.15m per site and this should be met from Capital bids. A further £0.03m will be needed for 1fte equivalent for back office processing.

School streets will cost approximately £0.040m and a further 0.25 FTE required for back office processing (at a cost equivalent of £0.03m for 1FTE)

The introduction of a CPZ will cost approximately £0.005m to £0.01m.

Legal implications and risks:

To be provided

Human Resources implications and risks:

To be provided

Equalities implications and risks:

To be provided. However, no negative impact is considered for any protected characteristics as disabled drivers who have a blue badge are allowed to park in restricted areas.

2. Appendix A. Government guidance

Home to school travel and transport guidance
Statutory guidance for local authorities
July 2014

Assessing route safety

20. Creating safe walking, cycling and travel routes and encouraging more pupils to walk and cycle to school is one of the best ways to reduce the need for transport and associated costs.

In assessing safety, local authorities should consider a range of risks, such as: canals, rivers, ditches, speed of traffic and fields of vision for the pedestrian or motorist.

An authority should also consider whether it is reasonable to expect the child's parent to accompany the child along a route which would otherwise be classified as being unsafe.

21. Good practice shows that using local knowledge, coupled with modern IT tools, is essential when assessing existing walking routes and identifying potential new ones. Putting in place suitable new paths, pedestrian crossings and cycle lanes can improve safety, but minimal investment can also reap significant rewards.

This might be something as simple as trimming overgrown hedges or preventing illegal parking.

Making parents aware of safe walking routes and the time taken to assess them can help alleviate concerns and significantly increase the amount of pupils choosing to walk.

3. Appendix B. Outline of evidence collection before decision for PSPO

	<i>Evidence</i>
<i>a</i>	Records of observation of driver behaviour in streets near the school related to drop-off or pick-up of pupils that poses a danger, and accident reports i.e. clear continuing reason for Council to impose controls

b	An assessment by the Highways team to advise whether other changes to streets are likely to change driver behaviours
c	An assessment by the Traffic and Parking Control Schemes Team to confirm existing markings are enforceable under the TMA and compliant.
d	Records of visits by CEO or police to streets where driver behaviour is dangerous i.e. indication that current enforcement of controls are not adequately addressing driver behaviours
e	Collection of traffic data including pedestrian numbers, pedestrian routes and directions (desire lines), vehicle speeds, vehicle volumes, and driver behaviours, during school gate hours
f	Written confirmation from Transport for London's Smarter Travel Team that the school has STARS accreditation i.e. the school must have made some effort to reduce danger to pupils

When evidence has been assembled, the issue will be subject to further assessment including road safety and financial by the Council before decision.

4. Appendix C. Decision criteria

No two school situations are identical.

Council officers shall recommend the most appropriate measures to improve safety based on:

- best practice street design,
- Council school travel policy,
- area plans,
- commitment shown by the school,
- the school travel plan,
- cost, and
- issues identified in gathered evidence.

A single solution may not always be as effective as a combination. CEO patrols are almost always part of a solution.

Displacement of driver behaviours occurs with all options, except 20mph zones.

Sometimes there may be money available from developers as a result of the planning process.

The distance a child walks in 10 minutes from a school gate is used for evaluation. This is not the same as 800 metre distance round the school.

In general, simplicity and enforcement are key to success.

All roads with a school gate on them should have;

- school keep clear road markings outside entrances
- school signs with flashing lights

Other Restrictions are likely to be well recognised if they are effective during hours consistent with similar restrictions in the borough. For school-gate restrictions, 8am-9.30am and 2.30pm-4pm are Havering standard.

A cul-de-sac with an entrance to school is more likely to be suitable for a School Street.

An area where several locations have dangerous parent driver behaviours may be suitable for a control zone or PSPO.

Enforcement

Camera enforcement is best where possible.

Sporadic enforcement by officers (CEO) appears next best.

Streets to each school should be visited once per fortnight.

PSPO vs School Street comparison, of camera enforcement

Topic	School Street	PSPO
Method:	Zone, Pedestrian, most vehicles are prohibited	Zone, no vehicles prohibited, targets driver behaviours
Type of Notice	PCN	FPN
Legislation	Traffic Management (decriminalised)	Antisocial behaviour (criminal)
Issued by	CEO or camera	CEO trained for PSPO or camera
Appeal process	Usual PCN Appeals process	PACE interviews available
separate accounting required	No	Yes
Contraventions / behaviours	Entry of prohibited vehicles to zone.	1. Vehicle stopping to drop-off or pick-up pupils.

	<p>This is relatively simple to enforce.</p> <p>Other school-gate driver behaviours are not addressed.</p>	<ol style="list-style-type: none"> 2. Vehicle being driven on the pavement / footways 3. Obstruction of dropped curbs 4. Obstruction of highway resulting in congestion 5. Hazardous parking preventing pupils crossing roads safely 6. Parking on school keep clear SKC markings 7. Parking of vehicles on areas with restricted parking to ensure safety of school pupils
Cost capital	<p>Moderate</p> <p>More than £40,000 if a camera captures all vehicle movements across zone boundary</p>	<p>High</p> <p>More than £150,000 for complete effectiveness with cameras monitoring vehicles in all the zone street area for prohibited behaviours</p>
Cost Operational	<p>Moderate</p>	<p>High due to the number of cameras, and the criminal process separate from PCN appeals</p>
Situations best suitable for	<p>Cul-de-sacs, and streets with a single entry for vehicles</p>	<p>Areas with several entry roads</p>

5. Appendix D. Reference material

This policy is in line with Havering's Air Quality Action Plan (2018-2023) themes:

- Public Health and awareness raising to encourage smarter travel
- Reducing emissions from transport

Havering Local Implementation Plan (LiP3)

Traffic Signs Regulations and General Directions (TSRGD)

Example School-gate related casualty:

<https://www.shponline.co.uk/in-court/school-pupil-death-missed-opportunities-led-to-fatal-incident/>

Speaking after the hearing, HSE inspector Helen Turner said: "Firstly, we send our heartfelt condolences to the family and friends of Ashley Talbot, whose life was tragically ended at just 15.

"We believe Ashley's death could have been prevented, and a series of missed opportunities meant this incident was waiting to happen. Although there had been previous near misses at Maesteg, there was no system for these to be reported and discussed. There are some clear lessons to be learned, particularly for other modern school sites.

"The need for children to cross the road to board their bus could have been taken away with proper planning and design, which should always seek to keep vehicles and pedestrians apart. HSE's guidance clearly states that transport safety at every workplace should start with the creation of a 'safe site.'

"Planning and parking should take into account 'desire lines', which are the routes most people will choose to take. Children may not be risk aware - there will be a rush of children all leaving school at once"

https://www.scotborders.gov.uk/info/20031/roads_and_pavements/882/school_travel_and_road_safety_education

Policy is to put 20 mph limits only directly outside schools and on the key approaches to schools (with the exception of some historical established zones). This is based on;

- effectiveness of 20mph zones diminishing
- greater number of sites becoming difficult to enforce
- cost of implementation, including staff to undertake survey work & consultation
- sign clutter becoming visually intrusive in residential areas

ⁱ <http://www.legislation.gov.uk/ukpga/2014/12/contents/enacted>

ⁱⁱ <http://www.legislation.gov.uk/ukpga/2004/18/part/6>

- iii The Education and Inspection Act 2006 (section 508A) puts a duty on schools to promote sustainable travel to school, and School Crossing Patrols are one option that can contribute to this duty.