

The Camden (Waiting and Loading Restrictions and Prescribed Routes) Experimental Traffic Order (No. 4) 2018

Notice is hereby given that the Council of the London Borough of Camden made the above mentioned order on 10 December 2018 under Section 9 of the Road Traffic Regulation Act 1984, as amended. The order will come into force on 7 January 2019.

The general nature and effect of the order will be to prohibit all vehicles, except cycles, from entering that part of Savernake Road, NW3, which lies between its junctions with Mansfield Road and Rona Road between 8.30 and 9.30am and between 3 and 4pm on Mondays to Fridays inclusive during Gospel Oak Primary School term times.

Exemptions will apply to vehicles authorised by the council – these will include vehicles belonging to residents who live in this section of Savernake Road and who either possess a valid “CA-B” residents parking permit, a valid disabled person’s badge and those with access to off-street parking provided the vehicle is registered at the same address. No charge is payable. Persons wishing to apply for authorisation to enter this section of Savernake Road whilst the entry restriction is in force should contact michelle.jamieson@camden.gov.uk or, for postal applications, Transport Strategy Service, FAO Michelle Jamieson, 5 Pancras Square, London, N1C 4AG.

Emergency service vehicles attending an emergency call within this section of Savernake Road will also be exempt from the restriction. 24-hour waiting and loading restrictions will be also be designated at the junctions with Mansfield Road and Rona Road.

The Council will be considering in due course whether the provisions of the experimental order should continue in force indefinitely. Copies of the proposed order and the Council’s Statement of Reasons for proposing to make the order may be inspected / obtained by contacting traffic.orders@camden.gov.uk or at the Contact Camden reception desk, 5 Pancras Square, N1C 4AG or online at camden.gov.uk/parking.

Within a period of six months beginning with the date on which this experimental order comes into force or, if the order is varied by other orders or modified pursuant to section 10 (2) of the Road Traffic Regulation Act 1984 beginning with the day on which the variation or modification or the latest variation or modification came into force, any person may object to the making of an order for the purpose of such indefinite continuation.

Any such objection must be made in writing, stating the grounds on which the objection is being made and sent to Michelle Jamieson, Senior Transport Planner, Transport Strategy Service, FREEPOST RSLT-RJBR-TXAA, Town Hall, Judd Street, London, WC1H 9JE, or by e-mail to TransportConsultations@camden.gov.uk

Peter Mardell
Head of Parking Operations
13 December 2018

**The Camden (Waiting and Loading Restrictions and Prescribed Routes)
Experimental Traffic Order (No. 1) 2018**

**STATEMENT OF REASONS
REASONS FOR PROCEEDING BY WAY OF AN EXPERIMENT**

The above order is made under s.9 of the Road Traffic Regulation Act 1984 and will remain in force for a maximum period of 18 months. It is expected that a decision to continue with its provisions indefinitely will be made after assessing the effect of the scheme over the course of 12 months from its commencement.

The principle measure is to close part of Savernake Road between its junctions with Mansfield Road and Rona Road between 8.30 and 9.30am and between 3 and 4pm on schooldays.

Gospel Oak primary school is situated on the eastern side of the restricted area described above. Concerns over safety and air quality have been identified at this location with the risk of accidents as a result of increased traffic during times when schoolchildren are entering or exiting the school premises

It is considered expedient to progress this scheme by way of an experiment with evidence being collected over the course of one year to determine its success balanced against any adverse effects which may appear. A report detailing the decision-making process behind the scheme, including analysis of prior consultation responses from residents and stakeholders, is appended to this statement.

Further information regarding the scheme can be obtained by e-mailing scholtravelplans@camden.gov.uk or from Michelle Jamieson, Senior Transport Planner, Transport Strategy Service, FREEPOST RSLT-RJBR-TXAA, Town Hall, Judd Street, London, WC1H 9JE.

10 December 2018

London Borough of Camden, Supporting Communities Directorate, Regeneration and Planning Division

Scheme Reference: HS-01_Savernake Road

**Matters for decision by the Director of Regeneration and Planning, Supporting Communities Directorate –
 NON KEY DECISION – June 2018**

REPORT TITLE	RECOMMENDATION	WARD	APPROVED BY
<p>Healthy School Streets (HSS) programme</p> <p>Gospel Oak Primary School</p> <p>Proposed Walking, Cycling and Road Safety improvements</p>	<p>That the Director of Regeneration and Planning approves, subject to compliance with relevant statutory requirements, the following measures under an experimental traffic order:</p> <p>A 'Healthy School Street Scheme' on Savernake Road, as set out in Option 2 of the proposals, using ANPR Cameras to enforce a timed road closure:</p> <ol style="list-style-type: none"> 1. The section of the road will be closed during the proposed hours of 8.30am-9.30am and 3pm-4pm Monday-Friday during term time. The closure will be enforced through the installation of two ANPR cameras to be installed on Savernake Road at two points, near the junction with Rona Road and the junction with Mansfield Road. 2. The relevant signage will be erected at both ends of the closed area to warn drivers of the restriction, as well as advance warning signage, subject to detailed design. 3. Implement new 'no loading and waiting at any time' restrictions (replacing Single Yellow Lines) at the junction of Rona Road and Savernake Road. 	<p>Gospel Oak</p>	<p>David Joyce Director, Regeneration & Planning, Supporting Communities Directorate</p>

	<ol style="list-style-type: none">4. Undertake a robust period of monitoring during the 12 month Experimental Traffic Order as set out in this report, and use the data gathered during the ETO period to consult, as appropriate, on making the scheme permanent (including with any changes as required) at the end of the 12 month trial. 5. To delegate to the Head of Transport Strategy authority for making any minor changes to the scheme that may be required during the ETO period		
--	--	--	--

HEALTHY SCHOOL STREETS – GOSPEL OAK PRIMARY SCHOOL – PROPOSED WALKING, CYCLING AND ROAD SAFETY IMPROVEMENTS

1. Report Summary

- 1.1. This report provides details of the responses to the consultation undertaken on proposals to improve walking, cycling and road safety around Gospel Oak Primary School, the pupil entrance/exit which is located on Savernake Road, NW3. It provides officers' consideration of the responses to the consultation including a recommendation on a way forward. Plans showing the consultation proposals (and recommended option 2) are provided in Section 3.9 of this report.

2. Background including surveys and observations

- 2.1. Gospel Oak Primary School is a community primary school with 468 pupils aged between 3 and 11 years old. School governors, with the support of the head teacher and staff, submitted a request to the Council to consider the implementation of a Healthy School Street to address concerns expressed about safety, poor air quality and traffic congestion. In their School Travel Plan they stated particular concerns about traffic congestion outside the school gate on Savernake Road and referenced observations about vehicles mounting the footway.
- 2.2. Collision data from the Transport for London (TfL) STATS 19 database shows the following in Mansfield Road, Savernake Road and from the side roads off Savernake Road up to the footbridge near the junction of Roderick Road for latest available data from 2016 onwards:

Table and map 1: Traffic collision data in vicinity of Gospel Oak school, 2016-2017

Year	Serious	Pedestrian Slight	Pedal Cycle Slight	Car Slight	Bus Or Coach Slight	Grand Total
2016						
Jan					1	1
Feb			1			1
May			1			1
Aug		1				1
Nov	1			1		2
2017						
Jun			1	1		2
Jul				1		1
Grand Total	1	1	3	3	1	9

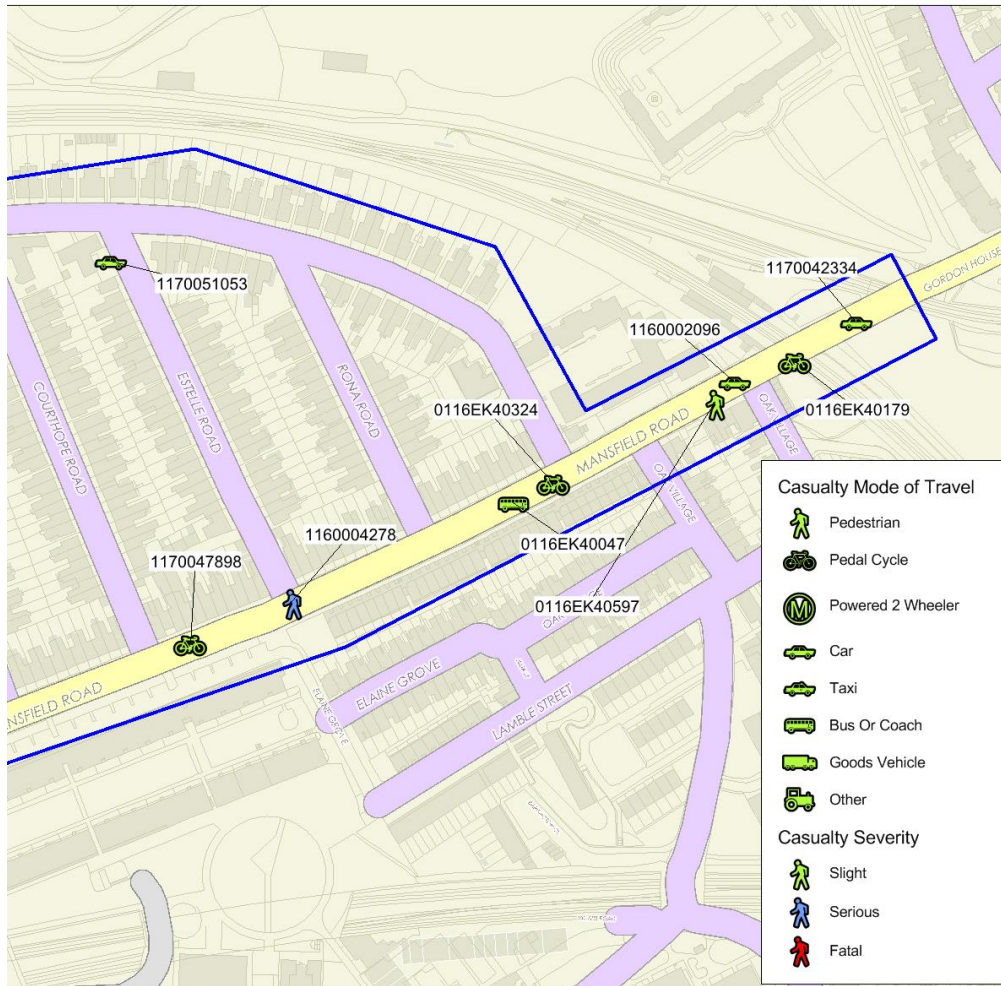


Figure 1 (above): collision plot map for immediate area around Gospel Oak School, 2016-2017

Two further slight collisions, including one involving a car and a pedal cycle, were recorded at the junction off Mansfield Road and Savernake Road in 2014-2015 (in the immediate vicinity of the school).

2.3. A “Healthy School Streets” (HSS) scheme programme was initiated by LB Camden in 2016 which looks into the feasibility of implementing measures (including timed road closures) to improve the perceived and actual safety, and the street environment, around schools in the Borough – and helping facilitate a switch to more sustainable modes of travel. Similar HSS schemes have been successfully implemented in other London Boroughs such as Hackney and Croydon. A similar road closure scheme outside St Joseph’s Primary school on Macklin Street in Holborn has been in place in Camden since July 2016 and positive feedback has been received so far about its operation, although this is operated by physically stopping vehicles accessing the road during the restricted period by raising and collapsing bollards. Following the success of this scheme, Camden have explored rolling out the Healthy Schools Streets programme to other schools in the Borough. Funding for this was allocated for 2018-19 under the Cabinet Member-approved LIP programme which can be found in this link:

<http://democracy.camden.gov.uk/mglIssueHistoryHome.aspx?Ild=38234&PlanId=354> (see Appendix C of that report for details).

2.4. Following a request sent to Ward Councillors (in early 2017), with suggested schools, requests were received to make Savernake Road a HSS outside Gospel Oak School. School Governors, staff and the head teacher also expressed a request for such a scheme.

2.5. During 2017-18 Gospel Oak was also selected for a Schools Air Quality Audit, funded by the Mayor of London, due to its high pollution levels. The Audit recognised that, according to London Atmospheric Emissions Inventory (LAEI) data, approximately 8,200 vehicles per day travel on core roads within a 200m radius of the school, which was within the first quartile in terms of traffic volumes amongst the 50 schools assessed as part of that Audit programme.

2.6. Vehicle emissions data for the LAEI modelled road links within 200m of the school, split by source, was also analysed to identify the key sources contributing to NO₂ in the vicinity of the school. Buses account for less than 1% of the total traffic but contribute 17% of the transport related NO_x emissions locally. Similarly, HGVs account for 5% of the total traffic but contribute 30% of total emissions. The audit was carried out by an independent consultancy, WSP. One of the recommendations from the audit was to make Savernake Rd a HSS and states 'WSP believes both of these options (i.e. options 1 and 2 as described the consultation leaflet) would provide significant benefits to air quality and road safety.'

2.7. A Memorandum of Understanding (MOU) was signed between LB Camden and Gospel Oak School in May 2017 in relation the proposed scheme to remove traffic from outside the school gates at the start and end of the school day. The MOU is appended to this report in Appendix A. In the MOU, actions were agreed both by the school and by LB Camden. LB Camden's actions are listed below:

- To develop plans for a Healthy School Streets intervention resulting in time-limited closure of school streets at start and end of the school day under Section 6 of the Road Traffic Regulation Act 1984.
- To fund the street changes to allow this to be implemented including signage, bollards and any other interventions needed to support the scheme.
- To provide other offers to support sustainable travel to school including free bikeability cycle training.

Some of the actions that were agreed for the school are listed below:

- Assisting LB Camden with data collection for evaluation of the scheme and reporting any major issues to LB Camden that may affect the running of the scheme, if approved.
- Engage in the STARS school travel plan project.

The aim of the STARS project is to promote and increase active travel to/from school, through regular monitoring via 'hands up surveys'. These are carried out each year by accredited schools. In the academic year 2017-18, Gospel Oak school engaged in the project by providing a 'hands up survey' to find out how children are travelling to/from school. They also held a 'STARS car free day' in September 2017, and a subsequent 'hands up survey' carried out that day showed a 6% decrease in the number of children being dropped off by car, which was achieved by asking parents not to drive their children to school that day. The school staff have been running other various sustainable travel initiatives throughout this academic year, and are hoping to achieve a Bronze accreditation on the STARS scheme this year. The results of the Hands up survey which was carried out in May 2017 is below:

Table 2: Gospel Oak School Hands Up Survey data

Travel Mode	Whole school (pupil) hands-up survey 2016/17 11/05/2017
Active Travel	83%
Walking	71%
Scotting	8%
Buggy	0%
Cycling	4%
Public Transport	5%
Rail/Overground	4%
Tube	0%
Public Bus	1%
School Bus/Taxi	0%
River	0%
Car	13%
Car/Motorcycle	13%

Car Share	0%
Park and Stride	0%

2.5 Traffic surveys were carried out on Savernake Rd over 1 week during school term time in March 2016 to help develop the project, and traffic volumes were found to be reasonably high at school pick up and drop off times, as shown in Table 3, below:

Table 3: Traffic volume on Savernake Road expressed in PCU/hour (March 2016)

	Mon 14- Mar- 2016	Tue 15-Mar- 2016	Wed 16-Mar- 2016	Thu 17-Mar 2016	Fri 18-Mar- 2016	Sat 19-Mar- 2016	Sun 20-Mar- 2016	Average weekday	7-day Average
8:30- 9:30	62	91	104	102	95	61	23	91	77
15:00- 16:00	93	92	92	100	105	75	52	96	87

3. Proposals

- 3.1. Officers considered the above background information and undertook site visits during each school run period (morning and afternoon) to observe motor vehicle movements, as well as how and where pedestrians (mainly Gospel Oak pupils) are crossing and what the typical driver behaviours were, especially during high pedestrian flow.
- 3.2. During the site visits it was observed that pupils enter through the main gate on Savernake Rd. They also observed that due to the road being narrow, when two vehicles try to pass each other, it causes the traffic to be backed up to the Mansfield Rd junction and blocks the zebra crossing outside the school on Savernake Road.
- 3.3. To address the above issues, and concerns raised by the school, officers considered two options that were subsequently developed as design proposals for public consultation.
- 3.4. The options that were considered are described in the table below:

Option	Description
1	ANPR Cameras to enforce the road closure, and to make Savernake Road 'one-way' between Mansfield Road and Rona Road
2	ANPR Cameras only on Savernake Road to enforce a timed closure and for Savernake Road retained as two-way working

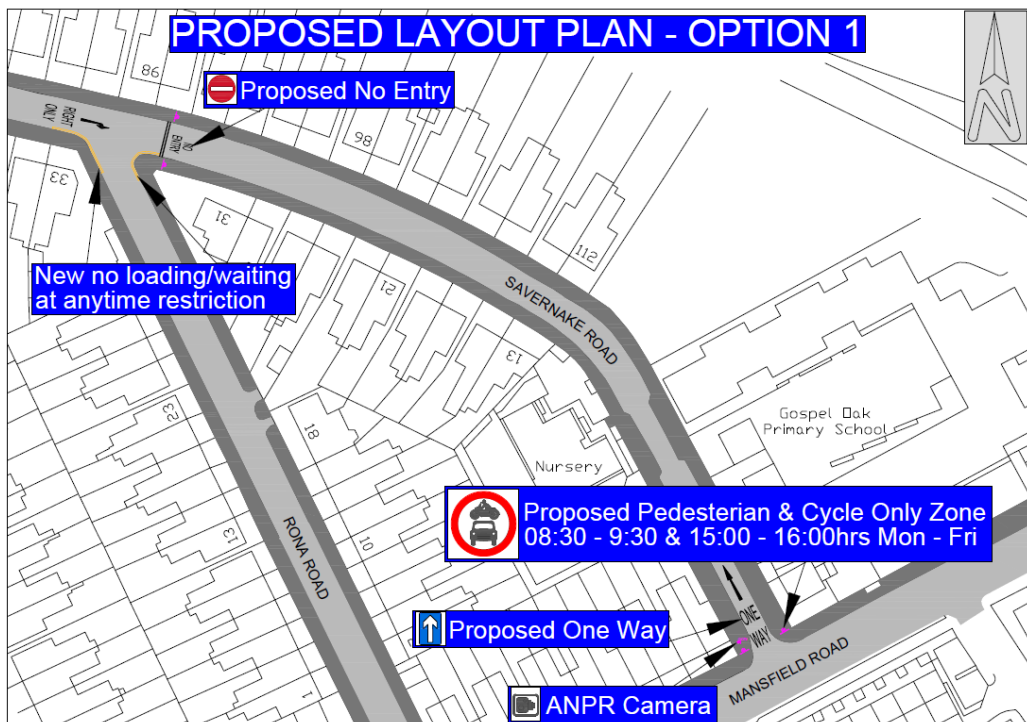
- 3.5. The solution of using an ANPR camera to enforce the timed road closure was selected as it presented more advantages when compared to the alternatives, as set out below.
 - Using physical measures such as bollard(s) to enforce the timed road closure is easier if the road is one way as vehicles could exit at one end whilst the physical restraint would only need to be implemented at the other end. This type of intervention also relies on someone physically raising or lowering the bollards. Outside St Joseph's School in Macklin Street in Camden, the road is closed by school staff who raise the bollards during the restricted period. Whilst this does work effectively in that location, it would be better to adopt a self-enforcing method that does not rely on individuals. Physical bollards also do not allow for access exemptions, such as blue badge holders, which ANPR cameras do.
 - The alternative of using mobile enforcement cameras was considered too, however, officers in Parking Operations advised that this method of enforcement has stopped being used by the Council since summer 2017 as it was not producing a cost efficient service.

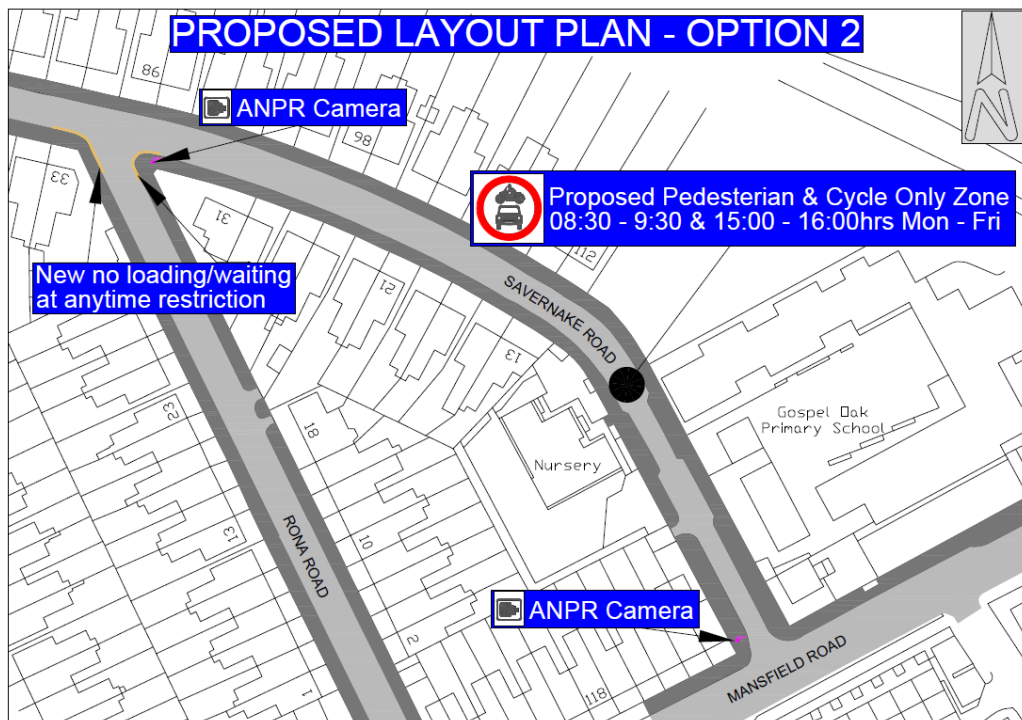
3.6. Details of the final proposals are detailed within the plans provided at the end of point 3.8. A copy of the consultation leaflet is provided in Appendix B.

3.7. The timed *Pedestrian and Cycle Zone* that prohibits motor vehicles from entering the section of Savernake Road during school term time, Monday to Friday between 8:30-9:30am and 3:00-4:00pm, will aim to reduce the amount of motor vehicles travelling on the closed section of Savernake Road when students arrive and leave at the beginning and end of the school day. Vehicles already parked in this section will be allowed to exit during restricted hours, however they will not be able to re-enter during the same period. Pedal cycles will be allowed to enter and exit the section at any time. We intend to exempt Blue Badge holders, however the operational logistics of these exemptions are yet to be decided upon. Residents with vehicles registered in the affected sections will also be exempt. An example of the sign to be used at the entry points of this restriction is shown above on the right. The sign will be covered outside school term time. Additional signage will also be located at key points in advance of the closure, where drivers have the opportunity to change to an alternative route without the need to U-turn. School staff will also send out communications about the closure to parents via Twitter, the school Newsletter and the school website.



3.8. The restriction will be enforced through the provision of signs and by ANPR cameras located at each end of the restricted area. ANPR cameras are automatic cameras that would record continuously and create an evidence package (a video clip) of the vehicle or vehicles that enter the prohibited section during the times of restriction. The cameras would only record and issue penalty charge notices during school term time and only during the period of restriction. Indicative locations for the ANPR cameras are shown below, which includes option 1 and 2 proposals that were consulted upon. The exact locations will be subject to detailed design and to a survey to be conducted from the chosen camera supplier. Prior to any cameras being installed, a Data Protection Impact Assessment, and an Equalities Impact Assessment will be carried out together with any other required approvals. The proposed layouts for each option are below:

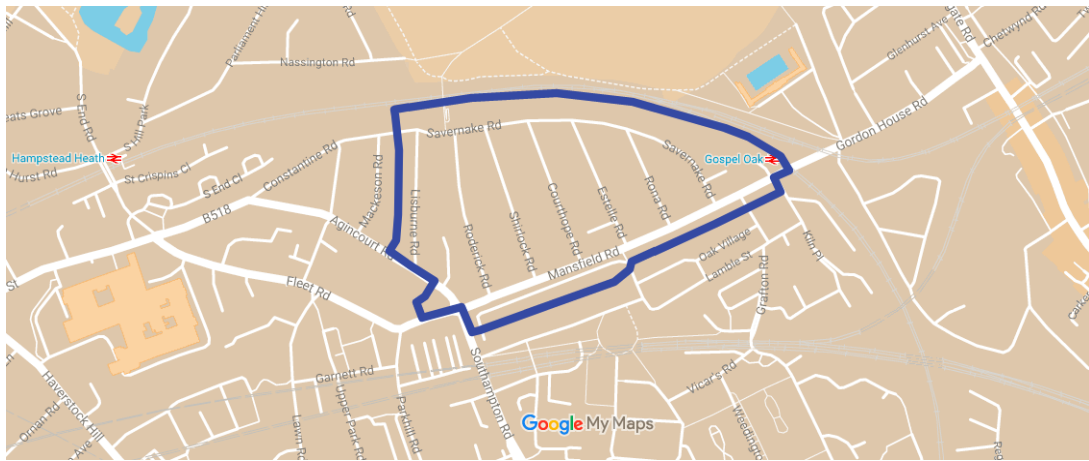




- 3.9. Under both options new no loading and waiting at any time restrictions would be implemented at the junction of Rona Road and Savernake Road (replacing current Single Yellow Lines with Double Yellow Lines and double kerb blips). This would be implemented to prevent vehicles stopping at that location for any waiting/loading purposes.
- 3.10. Officers consider that by reducing traffic movement in the area outside the school, the measures will improve actual and perceived safety for those walking and cycling in the area, while encouraging pupils to walk and cycle to/from Gospel Oak School.
- 3.11. The proposed scheme helps deliver some of the agreed objectives which comply with Camden's Transport Strategy, for which an Equalities Impact Assessment (EQIA) was undertaken. These are:
- Encourage healthy and sustainable travel choices by prioritising walking, cycling and public transport in Camden.
 - Improve road safety and personal security for people travelling in Camden.
 - Develop and maintain high quality, accessible public streets and spaces and recognise that streets are about more than movement.
 - Ensure the transport systems supports access to local services and facilities, reduces inequalities in transport and increases social inclusion.
- 3.12. The proposed scheme also aims to address the following from the Camden Plan:
- The council will use all the resources at its disposal to play its part in improving air quality, one of London's biggest challenges.
 - We will do what we can to reduce carbon emissions in the borough, lowering emissions from our own estate and operations, and working with others to make a powerful alliance for carbon reduction.
 - We will make it easier for people to travel more by foot or by bike.

4. Consultation

- 4.1. A public consultation was carried out between 19th January and 23rd February 2018. 1263 residents in the consultation area were posted leaflets. A map of the consultation area (where leaflets were posted to) can be seen below (in blue).



- 4.2. Leaflets were also sent to statutory groups and local groups as listed on the CINDEK database, and were uploaded online at the Council's 'We Are Camden' consultations website. Any interested party could submit a response online, regardless of their location. A copy of the consultation leaflet and questionnaire is attached in appendix B.
- 4.3. A total of 156 valid responses were received. The public consultation respondents were classified as follows:

Respondent's type	Description	Number of respondents	Percentage
Camden Resident-within	Camden resident within the consultation area set out in leaflet	81	52%
Camden Resident-out-adjacent	Camden resident adjacent to the consultation area set out in leaflet (up to 750m radius - see map above)	20	13%
Camden Resident-out	Camden resident based in Camden but outside and not adjacent to the consultation area set out in leaflet	29	19%
School-headteacher (official)	Official Gospel Oak Primary school's response	1	1%
School-parent	Gospel Oak School Parents responses	10	6%
School-other	other respondents relating to school but not as parents or headteacher at GOPS	6	4%
Local Group	Gordon House Road Residents Association	1	1%
Councillor	Cllr Marcus Boyland & Cllr Jenny Mullholland	2	1%
Business	Business owners; one Camden business owner (adjacent to consultation area) and one located out of Camden.	2	1%
Visitor	Non-Camden residents who visit the area.	3	2%
Other	other respondents - one Islington resident	1	1%
Total		156	100%

A breakdown of the results follows:

4.4.1 Responses to Question 1

Do you agree with our proposal to designate Savernake Road as a Healthy School Street?

Question 1: <i>Do you agree with our proposal to designate Savernake Road as a Healthy School Street?</i>			
Respondents' type	Response		
	Yes	No	No

			opinion
Camden Residents within consultation area	61	19	1
Camden Residents adjacent to consultation area (outside the consultation area but within 750m radius from proposals)	17	3	-
Camden Residents out of consultation area (Camden residents based in Camden but outside and not adjacent to the consultation area set out in leaflet)	23	5	1
School & parents	9	2	-
School (other) (respondents relating to school but not as parents or headteacher at GOPS)	5	1	-
Local Groups (Gordon House Road Residents Association)	1	-	-
Councillors	2	-	-
Business (businesses with an interest in the scheme)	1	1	-
Visitors (non-Camden residents who visit the area)	2	1	-
Other (one non-Camden resident that doesn't classify as visitor to the area)	-	1	-
Total	121 (78%)	33 (21%)	2 (1%)

From the responses summarised in the table above, there is an overall opinion that a HSS scheme on Savernake Road is generally welcomed by the respondents, including strong support expressed by Camden residents both within and outside of the consultation area.

4.4.2 Responses to question 2

Question 2 was phrased as follows:

If you have answered YES to question 1, please indicate which option you would like the Council to implement.

Opt. 1

ANPR Cameras for timed road closure enforcement, and Savernake Road made permanently 'one-way' working northbound, between Mansfield Road and Rona Road

Opt. 2

ANPR Cameras only on Savernake Road to enforce timed road closure between Mansfield Road and Rona Road

Question 2: If you have answered YES to question 1, please indicate which option you would like the Council to implement.			
Respondents' type	Response		
	Option 1	Option 2	No opinion
Camden Residents within consultation area	19	41	21
Camden Residents adjacent to consultation area (outside the consultation area but within 750m radius from proposals)	9	7	4
Camden Residents out of consultation area (Camden residents based in Camden but outside and not adjacent to the consultation area set out in leaflet)	10	15	4

School & parents	5	4	2
School (other) (respondents relating to school but not as parents or headteacher at GOPS)	1	4	1
Local Groups (Gordon House Road Residents Association)	1	-	-
Councillors	1	1	-
Business (businesses with an interest in the scheme)	-	1	1
Visitors (non-Camden residents who visit the area)	1	1	1
Other (one non-Camden resident that doesn't classify as visitor to the area)	1	-	-
Total	48 (31%)	74 (47%)	34 (22%)

The table above shows that overall, 47% of all those who responded to Question 2 prefer option 2 and 31% of those respondents stated that they preferred option 1. A further 22% expressed no opinion. If the 34 respondents expressing 'no opinion' are discounted then of the respondents who expressed a preference for one of the two options implemented, 61% favoured Option 2 and 39% were in favour of Option 1.

4.5 **Objections and Officer Responses**

As the above tables show, whilst there was substantial overall support for the proposals – and particularly Option 2 - several objections to the scheme were received. These are grouped and summarised below:

4.6 **Objections from Rona Road Residents**

4.6.1 Four Rona Rd residents objected to the scheme as they considered that it would divert traffic towards Rona Rd, and cause pollution issues for them. One stated that not enough evidence was given on the consultation document to warrant the need for the scheme. 17 residents suggested making Savernake Rd one way all the way up to Agincourt Road.

4.6.2 A particular concern from a resident was raised that the consultation had not been carried out in a fair and lawful way due to the consultation document being presented in a misleading way and due to lack of proper engagement. Specifically, it was argued that the Council had not carried out fair consultation because:

(1) Consultation must be at a time when proposals are still at a formative stage. In this instance the resident's view was that consultation appears to proceed on the basis that a decision for option 1 or option 2 has already been taken.

(2) The absence of any proper impact assessment on pollution and traffic flows on Rona Rd makes intelligent consideration and response impossible.

(3) The consultation has not been properly publicised and therefore insufficient time for consideration of responses has been provided.

4.7 **Officer comments on residents' objections**

4.7.1 The school staff, parents and governors requested the scheme due to their concerns about road safety as stated on their School Travel Plan. Traffic counts undertaken on Savernake Rd show over 90 vehicles per hour on Savernake Road during school opening and closing times. As part of the initial feasibility into this scheme, Officers did consider the possibility of making Savernake Road one way northbound from Mansfield Road for a longer section, including all the way to the junction with Constantine Road in order to avoid traffic being reassigned on Rona Road and other intermediate parallel roads. However a more extensive scheme such as that would need to be incorporated into a wider traffic management project to

reduce rat running in the area, and associated traffic modelling, particularly if significant impacts on signalised junctions (such as the Fleet Road/Agincourt Road/Mansfield Road gyratory area) would be incurred. Officers are instead suggesting using an experimental traffic order for a year on this HSS scheme, and monitoring the effects on Rona Road and other roads in the vicinity throughout, in order to gauge if the scheme should be made permanent, and any other changes that may be required.

4.7.2 In response to the objection from the resident noted in point 4.6.2, responses are as follows:

- 1) It is the view of officers working on this scheme, and of Camden's legal team that the consultation was carried out in line with the Council's standard approach, which is designed to ensure residents' views are heard and factored into the decision making process. All residents in the affected area including Rona Road were sent consultation leaflets. The options in the consultation leaflet were given as proposals (and therefore at a formative stage) and no decision had been made regarding those possible options at the time of consultation. Our consultation leaflet included the following statement under 'This is your opportunity to comment': *'The Council will be pleased to hear your views on the proposals we are consulting on as well as any alternative suggestions or objections you may have to any aspect of this scheme'*.
- 2) Traffic data for the Gospel Oak area, as well as some air quality monitoring data around Gospel oak School, has been provided in the background section of this report. The proposal is to introduce a timed road closure under an Experimental Traffic Order for 12 months during which time traffic (and air quality data) can be monitored on Rona Road and other streets in the vicinity of the area to assess any impacts. We would then re-consult on any proposals to potentially make the scheme permanent based on that trial period, as we did with our initial Healthy school Street pilot for St. Josephs School on Macklin St for example.
- 3) Officers have in fact given more time (5 weeks) for consideration and response to this consultation, than is usual for this type of scheme. The consultation was advertised both online and through leaflets to 1,263 properties on all affected roads leading off Savernake Road.

4.8 **Objections from Councillors**

4.8.1 A Ward Councillor in the Belsize ward at the time of consultation objected to the scheme, and as a Savernake Road resident thought that there was not a need for such a scheme due to perceptions of low traffic flows on Savernake Road. The (then) Councillor stated that Mansfield Road was where traffic problems are. At the time of writing this report that Ward Member is no longer a Camden councillor.

4.9 **Officers Comments on councillors' objections**

4.9.1 As noted previously, traffic flow data shows reasonably high levels of traffic on Savernake Road, plus other background issues and context (including the Council's established policies to encourage active and sustainable travel to and from school), which identified a need to explore a possible scheme. The high levels of support shown in this consultation, including from residents in the consultation area, also indicate that there is a locally-expressed requirement for such a scheme.

4.9.2 Officers also held a meeting with current Ward Members from Gospel Oak Ward on 14th June 2018 at which Members were appraised of the development of the scheme and consultation responses. A summary of the issues raised and discussed in this meeting are below:

- If a scheme were to be implemented, clear signage would be needed for drivers. Officers suggest including positioning these further back (in westerly direction) along Savernake Road, and potentially along Agincourt Road/Constantine Road, so that advance location signage of the timed closure section of the far eastern end of Savernake Road is provided to drivers, and encouraging them to use the main Agincourt Road route and/or other roads before reaching the closed section. Exact sign design and locations will be drawn up as part of any detailed design of a scheme.
- If a scheme were to be implemented it is proposed to do so under an Experimental Traffic Order (ETO), which would then be re-consulted on after 12 months, during which time traffic surveys,

and air quality monitoring would be undertaken. Information from those surveys would be included in consultation materials at that point.

- Some residents have questioned the need for a scheme at all on Savernake Road. Officers are of the view that this report sets out the rationale for a scheme, and the overall support received at consultation for implementing a Healthy School Street Scheme on Savernake Road (78%) supports that assertion. This is also broadly in line with previous Healthy School Street schemes which received overall 80% support (St. Joesphs School), and 62% (Acland Burghley School) at consultation stage.
- Concerns from residents were also raised regarding ANPR cameras and privacy impacts. One resident suggested that the two cameras proposed should be placed together by the school, as pointing them towards properties on Savernake Road creates potential privacy issues for residents. However, ANPR cameras would need to be placed at entry and exit points of the closure in order to enforce contraventions. A Data Privacy Impact Assessment (DPIA) has been carried out, which explains the way the cameras operate: Data (captured CCTV footage) is processed by unattended CCTV cameras, which are pre-configured to identify traffic contraventions specific to the location. An ANPR module is fitted to the camera to enable it to capture an image of the vehicle's registration plate (also known as a VRM). While the cameras maybe operational 24/7, it does not capture data unless a contravention is observed by the system using predefined software parameters. In addition, the cameras are fixed in position and cannot be moved (operated) restricting the scope of the cameras to serve functions beyond traffic enforcement. Access to data is limited to Civil Enforcement Officers who are provided under contract by the incumbent parking enforcement contractor for council – NSL Services Ltd. The system cannot be used unless the person has access rights in the form of a username and password and the appropriate access key.

5. **Suggestions and comments from residents**

5.1 A resident expressed a view that camera only enforcement along with timed closures causes problems as people don't read the signs on routes they drive fairly regularly and then are unfairly penalised. The resident cited a similar issue with (existing) timed closure and camera enforcement on Grafton Road in Camden. The resident felt that these issues disappeared when timed no entry signs were installed, and requested that such signs are installed for this scheme.

5.1.2 **Officers Comment**

Traffic Sign Regulations do not permit timed exemptions to no entry signs and propose that alternative signage (such as "motor vehicles prohibited" or "all vehicles prohibited" signs) be used. A variable message sign such as the one implemented at Grafton Road was considered as a potential solution for this location, however it was discarded as an option for the following reasons:

- Using a no entry sign would not allow blue badge holders or residents of the affected section of Savernake Road to enter this section of Savernake Road (as no exemptions can be added below a no entry sign).
- The sign is large and could be visually intrusive for the streetscape of Savernake Road, which is a quieter residential street compared to Grafton Road.
- Implementation and maintenance costs are high and would not be justified for a local scheme like this. On Grafton Road, it was an appropriate solution given that the size and impact of the scheme was wider.

Previous healthy school street schemes in Camden and other London Boroughs have found the 'Pedestrian and Cycle Zone' signage as pictured in paragraph 3.8 of this report to be most effective.

6. **Other general residents' comments**

6.1 A resident who supported Option 2 felt it would be necessary for the residents of Savernake Road between Rona Road and Mansfield Road who have a car to be able to access this stretch of road in order to park, even during the restricted hours, due to current parking stress levels. Some residents felt it would also be important to include warning signs before the turning off into Constantine Road (coming from

South End Green) and higher up Savernake Road so that cars turn off before they get to Rona Road to prevent traffic build up closer to the restricted area.

6.2 Officers Comment

Residents with registered vehicle permits in the affected section of Savernake Road will be exempt from the timed restriction. Residents who do not have a registered parking permit but live on the affected section, parking off street on private land, will need to apply for an exemption free of charge. This will allow local residents in the affected section of Savernake Road only to drive into and out of the zone at any time. Blue badge holders will also be exempt and will be able to enter and exit the restricted section at any time. Exiting the restricted section will be allowed at any time by any vehicle that was parked in the section before the restriction started. Advance warning signs will be placed in locations around the zone (locations of these signs will be specified during detailed design), and as indicated in section 3.7 of this report.

7. Suggestions and Comments from Gospel Oak School parents

A resident/parent stated they had selected option 2, but would be in favour of option 1 (with the one-way restriction) if it were still possible for bicycles to travel both ways along Savernake Road, given Mansfield Road is busy with large vehicles, and the need for cycling in both directions on this quieter street.

7.1 Officers Comment

Cyclists will be allowed to enter the Savernake Road section that will be under the “pedestrian and cycle zone” timed restriction under option 2, which is being proposed for implementation due to greater levels of support at consultation.

8. Positive Comments from respondents

In addition a number of responses were received with positive comments about the scheme. Examples are shown below:

- *This is a long-overdue and badly needed change. Savernake Road is congested and dangerous during school start/stop times. Thank you for making our children safer!*
- *As a parent at the school, I wholeheartedly support the second suggestion. This will make a real and palpable difference to not only the air quality but the safety at the school which is over a split site, particularly during drop off and pick up. I hope it will discourage those parents who do their car unnecessarily. I am grateful to Camden for giving consideration to this - it is so obviously a rat run to avoid Mansfield.*
- *Please make this healthy school street be the second of many in the borough.*

9. Financial Implications

There are no significant financial implications as a result of this proposal. The estimated cost of the scheme is £60,000, which would fund the two ANPR cameras required and associated measures necessary to implement the scheme. Funding has been secured from TfL under the Local Implementation Plan, cost code CDST7298 (Healthy School Streets/STP Engineering) for 2018/19 financial year. Should the scheme be approved for implementation and the works overlap to 2019/20 then further funding will be made available from the same budget programme (HSS) to complete the scheme. There may also be a potential delay in purchasing the cameras, through a tender process which may mean that implementation is not possible until 2019/20.

10. Officer Recommendation

Given the consultation responses and issues and considerations set out in this report, Officers recommend that the Director of Regeneration and Planning approves, subject to compliance with relevant statutory requirements, the following measures to be implemented under an experimental traffic order for 12 months, a Healthy School Street Scheme on Savernake Road using ANPR Cameras as per ‘Option 2’ of the proposals, and detailed as follows:

1. The section of Savernake Road between Mansfield Road and Rona Road to be prohibited for motor vehicles during the proposed hours of 8.30am-9.30am and 3pm-4pm Monday-Friday during term time periods only.

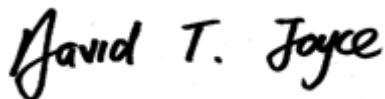
2. Any vehicles parked in the above section outside the above proposed restriction times that wish to exit the restricted section, can do so at any time.
3. The timed closure will be enforced through the installation of two ANPR cameras to be installed on Savernake Road at two points, near the junction with Rona Road and the junction with Mansfield Road.
4. The relevant "Pedestrian and Cycle Zone" signage will be erected at both ends of the closed area to warn drivers of the restriction.
5. Residents who live and have registered parking permits on the section of Savernake Road between Mansfield Road and Rona Road, as well as registered blue badge holders (see note in section 3.7), will receive an exemption which will allow them to enter and exit at any time. Residents who live on the above section but do not have a parking permit (because they park on private land / driveways) will be issued free of charge an exemption to enter the road section at any time, in order to access their properties at any time.
6. Implement option 2 under an Experimental Traffic Order (ETO), during which time a robust period of monitoring will take place. Officers will commission traffic surveys on Rona Road and Savernake Road as a minimum, and identify other traffic survey locations as part of that monitoring programme. These count points will have data collected for 1 month before implementation and 1 month after implementation to gauge impacts on traffic flows. Air quality monitoring tubes will be placed (at least) on Savernake Road outside the school and Rona Road during, and for a period before, the ETO period. We will use that monitoring data plus any other information gathered during the ETO period (such as road traffic collision data, and Hands Up Survey results from Gospel Oak school) to consult, as appropriate, on making the scheme permanent (including with any changes as required) at the end of the 12 month trial.
7. Implement new 'no loading and waiting at any time' restrictions (replacing Single Yellow Lines) at the junction of Rona Road and Savernake Road
8. To delegate to the Head of Transport Strategy authority for making any minor changes to the scheme that may be required during the ETO period

Subject to approval of these recommendations, a detailed design stage (including Level 1/2 Road Safety Audit) would be carried out ahead of advertising the proposals through the relevant statutory processes.

Attached Appendices

APPENDIX A: MOU between Gospel Oak School and London Borough of Camden.
APPENDIX B: Scheme consultation leaflet

Signed by Director:



David Joyce
Director of Regeneration and Planning
Supporting Communities Directorate
Date: 1.8.2018

Project Manager: Michelle Jamieson
Email: Michelle.jamieson@camden.gov.uk
Dated: 29th June 2018

REPORT ENDS

The Camden (Waiting and Loading Restrictions and Prescribed Routes) Experimental Traffic Order (No. 4) 2018

2018 No. 76

SAVERNAKE ROAD

LONDON BOROUGH OF CAMDEN

TRAFFIC MANAGEMENT ORDER

2018 No. 12

The Camden (Waiting and Loading Restrictions and Prescribed Routes) (No. 4)
Experimental Traffic Order 2018

Made on 10 December 2018

Coming into force on 7 January 2019

The Council of the London Borough of Camden, after consulting the Commissioner of Police of the Metropolis, in exercise of the powers conferred by section 9 of Road Traffic Regulation Act 1984 [1984 c. 27], and of all other powers thereunto enabling, hereby make the following order:

1. Citation and commencement

- 1.1 This order shall come into force on 7 January 2019 and may be cited as the Camden (Waiting and Loading Restrictions and Prescribed Routes) (No. 4) Experimental Traffic Order 2018.

2. Interpretation

- 2.1 In this order the term "pedal cycle" has the same meaning as ascribed to it by the Traffic Signs Regulations and General Directions 2016 [S. I. 2016 No. 362].
- 2.2 Any reference in this order to any enactment shall be construed as a reference to that enactment as amended, applied, consolidated, re-enacted by or as having effect by virtue of any subsequent enactment.

3. Restrictions – prescribed route

- 3.1 No person shall cause any vehicle other than a pedal cycle to enter that part of Savernake Road which lies between its junctions with Mansfield Road and Rona Road between 8.30 and 9.30am or between 3 and 4pm on Mondays to Fridays inclusive during Gospel Oak School term times.
- 3.2 The council shall cause signage to be displayed indicating such restrictions at such times and locations described in Article 3.1 as prescribed or authorised under sections 64 and 65 of the Road Traffic Regulation Act 1984.

4. Restrictions on waiting and loading

- 4.1 Whilst this order remains in force, the provisions of the Camden (Waiting and Loading Restrictions) (Civil Enforcement Area) Traffic Order 2012 [2012 No. 1] shall have effect as though there were included with the items relating to Rona Road and Savernake Road in Schedules 1 and 2 to that order, the items set out respectively in tables 1 and 2 of the schedule to this order.

5. Exemptions

- 5.1 The restrictions set out in Article 3.1 shall not apply in respect of;
- 5.1.1 anything done with the permission or at the direction of a police constable or traffic warden in uniform;
- 5.1.2 any person who causes any vehicle to proceed in accordance with any restriction or requirement indicated by traffic signs placed pursuant to Section 66 or 67 of the Road Traffic Regulation Act 1984;
- 5.1.3 a vehicle being used by the fire brigade, ambulance service or police in an emergency;
- 5.1.4 any person causing a vehicle to enter that section of Savernake Road after having obtained authorisation from the council to do so.

6. Power to modify or amend this order

- 6.1 Pursuant to Section 10 (2) of the Act of 1984, the Director of Regeneration & Planning, Supporting Communities Directorate, or any person authorised by him may, if it appears to him or such other authorised person essential in the interest of the expeditious, convenient and safe movement of traffic, or in the provision of suitable and adequate parking, or for preserving or improving the amenities of the area through which any road affected by this order runs, modify or suspend this order or any of the provisions in this order.

Dated this 10 December 2018



Peter Mardell
Head of Parking Operations

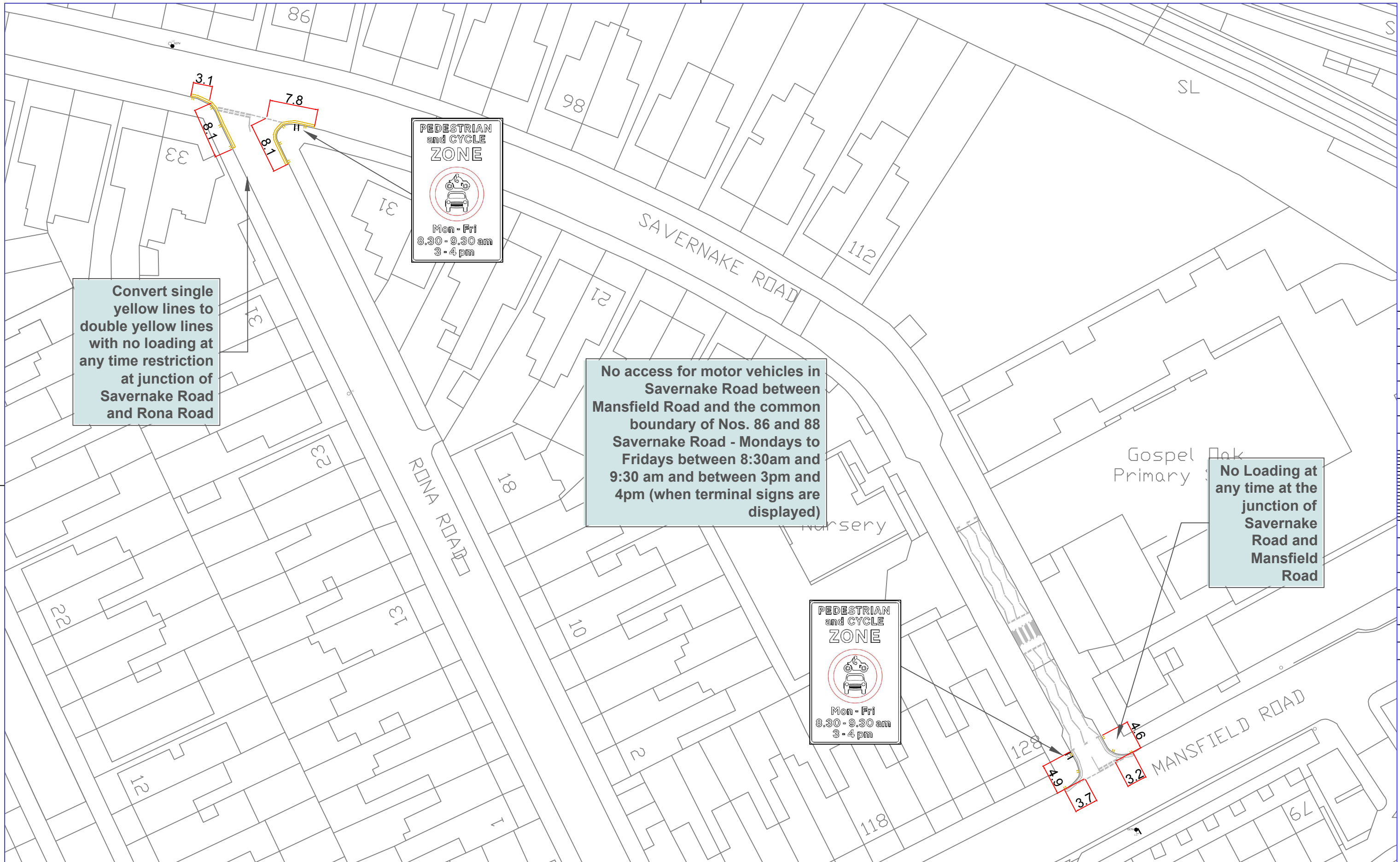
SCHEDULE

TABLE 1 – ITEMS INCLUDED IN SCHEDULE 1 TO THE CAMDEN (WAITING AND LOADING RESTRICTIONS) (CIVIL ENFORCEMENT AREA) TRAFFIC ORDER 2012

ITEM NUMBER	STREET, SIDE OF STREET and LENGTH OF HIGHWAY	PRESCRIBED HOURS
	RONA ROAD	
(aa)	north-east side: from the south-western kerb line of Savernake Road south-eastwards for a distance of 8.1 metres	A
(ab)	south-west side: from the south-western kerb line of Savernake Road south-eastwards for a distance of 8.1 metres	A
	SAVERNAKE ROAD	
	south-west side:	
(aa)	from a point 3.1 metres west of the south-western kerb line of Rona Road to a point 7.8 metres east of the north-eastern kerb line of Rona Road	A
(ab)	from the north-western kerb line of Mansfield Road, north-westwards for a distance of 4.9 metres	A
(ba)	north-east side: from the north-western kerb line of Mansfield Road, north-westwards for a distance of 4.6 metres	A

TABLE 2 – ITEMS INCLUDED IN SCHEDULE 2 TO THE CAMDEN (WAITING AND LOADING RESTRICTIONS) (CIVIL ENFORCEMENT AREA) TRAFFIC ORDER 2012

ITEM NUMBER	STREET, SIDE OF STREET and LENGTH OF HIGHWAY	PRESCRIBED HOURS (see
	RONA ROAD	
(aa)	north-east side: from the south-western kerb line of Savernake Road south-eastwards for a distance of 8.1 metres	1
(ab)	south-west side: from the south-western kerb line of Savernake Road south-eastwards for a distance of 8.1 metres	1
	SAVERNAKE ROAD	
	south-west side:	
(aa)	from a point 3.1 metres west of the south-western kerb line of Rona Road to a point 7.8 metres east of the north-eastern kerb line of Rona Road	1
(ab)	from the north-western kerb line of Mansfield Road, north-westwards for a distance of 4.9 metres	1
(ba)	north-east side: from the north-western kerb line of Mansfield Road, north-westwards for a distance of 4.6 metres	1



Rev	By	Date	Amendments