

Living Streets response to Department for Education consultation on new home to school travel and transport guidance

Background

We are the national charity that stands up for pedestrians. With our supporters we work to create safe, attractive and enjoyable streets, where people want to walk. We work with communities, professionals and politicians to make sure every community can enjoy vibrant streets and public spaces.

We started life in 1929 as the Pedestrians Association and have been the national voice for pedestrians throughout our history. In the early years, our campaigning led to the introduction of the driving test, pedestrian crossings and 30 mph speed limits. Since then our ambition has grown. Today we influence decision makers nationally and locally, run successful projects to encourage people to walk and provide specialist consultancy services to help reduce congestion and carbon emissions, improve public health, and make sure every community can enjoy the benefits of walking.

Introduction

We make a number of comments within our response below. Living Streets' key recommendations are:

- The inclusion in the revised guidance of initiatives to improve the walk to school including pupil priority/walking zones, park and stride and School Route Audits;
- The inclusion of a range of best practice case studies regarding improving the walk to school and promoting walking to school amongst parents and carers.

1 a) Do you agree that the new guidance represents a less prescriptive approach to guidance on home to school transport?

<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not Sure
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1 b) Do you consider the guidance overall is clear about the statutory duties and the expectations on local authorities, while reducing prescription to enable innovation and bespoke solutions?

Please use the box below to provide comments on this question, including suggestions for improvement.

Yes No Not Sure

Whilst Living Streets agrees the guidance represents a less prescriptive approach whilst retaining clarity regarding statutory duties, we believe the revised guidance should support councils in promoting walking to school. This can be achieved through the provision of best practice examples from those councils and schools who already effectively promote walking to school. Further details are included in our response to question six.

3 a) Do you support the recommendation that there should be a two stage approach to conducting appeals?

Yes No Not Sure

3 b) Do you think the recommended appeals process meets its aim of being both clear for parents and local authorities and more independent?

Please use the box below to provide comments on this question, including any suggestions for improvement.

Yes No Not Sure

No comment on this question

3 c) Do you agree that appeal panel members should be independent of the local decision-making process regarding the suitability and safety of travel arrangements?

Yes No Not Sure

3 d) Do you agree with the approach outlined in the guidance about the key considerations for local authorities when reviewing whether a walking route can be designated as being safe?

Yes No Not Sure

We welcome the approach outlined in section 6.1, in particular, recognising both the physical risks such as canals and rivers but also perceived and actual risks such as speeding vehicles and inconsiderate parking. Research undertaken by Living Streets has shown that speeding traffic scares over a third (36%) of children and young people and deters them from walking to school, and over one in five children and

young people are concerned about the lack of safe crossing points on their journeyⁱ. Busy roads, fast moving traffic and poor walking infrastructure are also barriers to walking commonly cited by parents and carers during the School Route Audits we undertake with schools across England.

However, we believe the section should also make reference to the importance of other measures to improve the surrounding road environment including the installation of crossings, 20 mph speed limits, reconfiguring road space or tackling issues such as inconsiderate parking including pavement parking and parking on zig-zag lines.

We would suggest that section 4.3 highlights the potential for local authorities to use the School Route Audit methodology to deliver safe walking routes. School Route Audits are a way of assessing the quality of the streets around a school to make sure that they are safe, accessible and welcoming and encourage walking to school. They are a school based version of Living Streets' award winning Community Street Audit which provides a way of involving local people to identify improvements to the walking environment. We have successfully used the School Route Audit process in the schools we work with through the Local Sustainable Transport Fund. The process provides a clear framework for engaging with children, parents, teachers and the local community and involves Living Streets staff leading children on a walk around the area surrounding the school, identifying opportunities for improving the walk to school through improvements such as the installation of footpaths and crossings through to establishing park and stride sites.

Living Streets has been funded to deliver walk to school interventions across England through the Local Sustainable Transport Fund since 2012. At the end of year two, the Walk to School Outreach project has already engaged 532 primary and 112 secondary schools from across thirteen local authority partner areas. Project coordinators have been working with schools to explore barriers to walking, deliver awareness events and implement incentive and reward schemes. The result has been an average 23% increase in the number of children walking at participating primary schools (equating to almost nine million new walking journeys by children and accompanying parents and carers) and over £140,000 of capital investment on physical route improvements.

We believe the guidance could be strengthened by retaining paragraphs 84-86 of the current home to school travel and transport guidance which provides a useful checklist of considerations for local authorities when conducting a risk assessment of a walking route.

Case Studies

- 4 a) Do you agree that the guidance benefits from the inclusion of case studies that highlight best practice in those areas covered within the guidance?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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4 b) Do you consider the case studies included in this guidance to be relevant and helpful?

Please use the box below to provide comments on this question, including any suggestions for improvement:

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
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We welcome the inclusion of case studies and have attached a number of potential case studies for inclusion to this consultation response including examples of Park and Stride, SEN Schools and School Route Audits.

5 Please use the box below to comment on the Department's expectation that local authorities should work closely with all schools to facilitate local transport arrangements for all area pupils.

We support the thrust of the Department's ambition but have reservations regarding the operational reality of such expectations in an environment of reduced local authority funding and increasingly devolved funding to Academies and Free Schools. We are concerned that without such facilitation the benefits of increasing walking to school rates will not be felt across local authority areas.

6 Please use the box below to add any additional comments on the guidance including general suggestions for improvement.

We welcome the retention of the guidance regarding the importance of partnership working in section 4.2 from the previous guidance but believe the economic importance of reduced congestion as a result of increased numbers of parents and carers walking their children to school should also be highlighted for Local Economic Partnerships. This is particularly important given that Local Economic Partnerships must support local authorities in bidding for Department for Transport Local Sustainable Transport Funding (LSTF).

The guidance should expand on the importance and role of other government departments in delivering this guidance. For example, in our experience, inconsiderate parking around schools is the most common barrier to walking to school for children and can vary from parking on the pavement to parking on zig-zag lines outside schools.

We would like to see a national ban on inconsiderate parking on zig-zag lines and pavements rather than forcing councils to apply for Traffic Regulation Orders on a piecemeal basis. A national ban would clarify the status of pavement parking and zig-zag lines for parents/carers and other road users as called for in the most recent report of the Transport Select Committee into local authority parking enforcement.ⁱⁱ

Ahead of the introduction of a national ban the Department for Transport should provide clear government guidance to local authorities to support the enforcement of inconsiderate parking offences following the recent consultation on local authority parking enforcement. These must be supportive of local authorities who wish to

tackle inconsiderate parking through a range of measures ranging from CCTV enforcement through to behaviour change initiatives with local schools. For example, Kent County Council operates the Zigzag initiative to target inconsiderate parking outside the school gates by messaging to parents through a series of coloured banners from yellow to red aimed at parents and carers.

We welcome the reference in section 4.5 to *Moving More, Living More* but we would like to see the section significantly expanded to make reference to Living Streets Walk to School programme and promotional opportunities such as Walk to School Week which takes place in May each year. The section should also make reference to tools which can be used to support walking to school such as Park and Stride and pupil priority/walking zones.

Pupil priority zones are already used by a number of councils across the UK, and are sometimes called walking zones, car free zones or school walking zones. For example, the London Borough of Hounslow has introduced Walk once a Week Walking Zones supported by maps of the areaⁱⁱⁱ, and in Brighton, Walking Zone maps have been produced for local schools and highlight the walking time to school in different areas of the walking zone^{iv}. A Walking Zone sets a clearly defined area around the school. It aims to encourage children and families to walk for at least part of their journey to and from school. Families who live in, or near, the Walking Zone are encouraged to walk to and from school every day, whilst those with longer journeys who choose to drive, are asked to park safely outside the zone and to walk the rest of their journey (see section on park and stride below). Parents and carers with limited mobility or other disabilities still park near the school as required.

Park and Stride schemes involve parents and carers driving some of the way to school, parking up and walking the rest of the way with their children or letting them walk on their own or with friends. Many parents do this informally but an effective way of managing Park and Stride is for the school to designate a parking site and to promote this to parents and carers. Some schools have agreements with local businesses to use their car parks for this purpose, ranging from supermarkets, local pubs and cinemas. Schools can download the Living Streets' Park and Stride toolkit, which includes everything they need to set up a Park and Stride scheme, including template letters for requesting permission from car park owners and informing parents/carers about the scheme. Walk Together schemes from the Park and Stride meeting points can also be set up to provide parents with extra piece of mind.

We welcome the reference in section 5.5 regarding the potential for the local authority to provide an escort to enable a child with SEN to walk a short distance to school in reasonable safety, instead of making arrangements for a taxi to them to and from school.

Within section 5.6 we believe consideration should be made to recommend that school buses park a short distance away from the school gate in order to allow school children to gain the health benefits of a short walk to and from the school bus every day. In our experience "Drop off" points for schools buses a short distance from the school entrance in the car parks of local businesses can work well.

We welcome the signposting to Living Streets in the further information section in 11.2.

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ⁱ Living Streets (2011) Breaking down the barriers

ⁱⁱ House of Commons Transport Select Committee (2014) Local authority parking enforcement -

ⁱⁱ House of Commons Transport Select Committee (2014) Local authority parking enforcement -

<http://www.publications.parliament.uk/pa/cm201314/cmselect/cmtran/118/118.pdf>

ⁱⁱⁱ <http://hounslowtp.org/walkingZones.php>

^{iv} [http://www.brighton-hove.gov.uk/content/parking-and-travel/travel-transport-and-road-safety/walking-school#Walking zones](http://www.brighton-hove.gov.uk/content/parking-and-travel/travel-transport-and-road-safety/walking-school#Walking%20zones)