

## LONDON BOROUGH OF CROYDON

To: all Members of the Council (via e-mail)  
Access Croydon, Town Hall Reception

### **PUBLIC NOTICE OF KEY DECISIONS MADE BY THE CABINET MEMBER FOR TRANSPORT AND ENVIRONMENT ON 18 FEBRUARY 2016**

In accordance with the Scrutiny and Overview Procedure Rules, the following decisions may be implemented from **1300 hours on 26 February 2016** unless referred to the Scrutiny and Overview Committee:

The following apply to each decision listed below

**Reasons for these decisions:** are contained in the **attached** Part A report

**Other options considered and rejected:** are contained in the **attached** Part A report

**Details of conflicts of Interest declared by any Cabinet Member:** none

The Leader of the Council has delegated to the Cabinet Member the power to make the decisions set out below:

#### **CABINET MEMBER'S DECISION REFERENCE NO. : 04/16/TE Decision Title - NORTH-CROYDON AREA-WIDE 20MPH SPEED LIMIT (STATUTORY CONSULTATION -REPORT ON OBJECTIONS)**

Having carefully read and considered the attached Part A report and the requirements of the Council's public sector equality duty in relation to the issues detailed in the body of the report, and the recommendations of the Traffic Management Advisory Committee, the Cabinet Member for Transport and Environment

#### **RESOLVED to:**

Agree, that the Highway Improvements Manager, Streets Division be authorised to make the necessary Road Traffic Management Orders under the Road Traffic Regulation Act 1984 (as amended) so as to implement the maximum 20mph speed limit for North Croydon area as identified on Plan HWY-MPH-1269-001 (TMO) attached to the report.

#### **Scrutiny Referral/Call-in Procedure**

1. The decisions may be implemented **1300 hours on 26 February 2016** (5 working days after the decisions were made) unless referred to the Scrutiny and Overview Committee.

2. The Borough Solicitor, Director of Legal and Democratic Services shall refer the matter to the Scrutiny and Overview Committee if so requested by:-
  - i) the Chair or Deputy Chair of the Scrutiny and Overview Committee and 4 members of that Committee; or
  - ii) 20% of Council Members (14)
3. The referral shall be made on the approved pro-forma (*attached*) which should be submitted electronically or on paper to Solomon Agutu and Jim Simpson by **1300 hours on 26 February 2016** . Verification of signatures may be by individual e-mail, fax or by post. A decision may only be subject to the referral process once.
4. The Call-In referral shall be completed giving:
  - i) The grounds for the referral
  - ii) The outcome desired
  - iii) Information required to assist the Scrutiny and Overview Committee to consider the referral
  - iv) The date and the signatures of the Councillors requesting the Call-In
5. The decision taker and the relevant Chief Officer(s) shall be notified of the referral who shall suspend implementation of the decision.
6. The referral shall be considered at the next scheduled meeting of the Scrutiny & Overview Committee unless, in view of the Borough Solicitor, Director of Legal and Democratic Services, this would cause undue delay. In such cases The Borough Solicitor, Director of Legal and Democratic Services will consult with the decision taker and the Chair of Scrutiny and Overview to agree a date for an additional meeting. The Scrutiny & Overview Committee may only decide to consider a maximum of 3 referrals at any one meeting.
7. At the Scrutiny & Overview Committee meeting the referral will be considered by the Committee which shall determine how much time the Committee will give to the call in and how the item will be dealt with including whether or not it wishes to review the decision. If having considered the decision there are still concerns about the decision then the Committee may refer it back to the decision taker for reconsideration, setting out in writing the nature of the concerns.
8. The Scrutiny and Overview Committee may refer the decision to Full Council if it considers that the decision is outside of the budget and policy framework of the Council.
9. If the Scrutiny and Overview Committee decides that no further action is necessary then the decision may be implemented.
10. The Full Council may decide to take no further action in which case the decision may be implemented.
11. If the Council objects to the decision it can nullify the decision if it is outside of the policy framework and/or inconsistent with the budget.

12. If the decision is within the policy framework and consistent with the budget, the Council will refer any decision to which it objects together with its views on the decision. The decision taker shall choose whether to either amend / withdraw or implement the original decision within 10 working days or at the next meeting of the Cabinet of the referral from the Council.
13. The response shall be notified to all Members of the Scrutiny and Overview Committee
14. If either the Council or the Scrutiny and Overview Committee fails to meet in accordance with the Council calendar or in accordance with paragraph 6 above, then the decision may be implemented on the next working day after the meeting was scheduled or arranged to take place.
15. URGENCY: The referral procedure shall not apply in respect of urgent decisions. A decision will be urgent if any delay likely to be caused by the referral process would seriously prejudice the Council's or the public's interests. The record of the decision and the notice by which it is made public shall state if the decision is urgent and therefore not subject to the referral process.

Signed: Gabriel Macgregor, Acting Director of Legal and Democratic Services

**Date: 18 February 2016**

Contact Officers: [Solomon.Agutu@croydon.gov.uk](mailto:Solomon.Agutu@croydon.gov.uk);  
[Kate.Norton@croydon.gov.uk](mailto:Kate.Norton@croydon.gov.uk)

Telephone: 020 8726 6000 Ext. 63876

**PROFORMA**

**REFERRAL OF A KEY DECISION TO THE  
SCRUTINY AND OVERVIEW COMMITTEE**

For the attention of: Solomon Agutu & Jim Simpson,  
Legal & Democratic Services Division

Meeting:  
Meeting Date:  
Agenda Item No:

**Reasons for referral:**

- i) The decision is outside of the Policy Framework
- ii) The decision is inconsistent with the budget
- iii) The decision is inconsistent with another Council Policy
- iv) Other: Please specify:

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**The outcome desired:**

**Information required to assist the Scrutiny and Overview Committee to consider  
the referral:**

Signed:

Date:

Member of \_\_\_\_\_ Committee

<b>REPORT TO:</b>	<b>Traffic Management Advisory Committee</b> <b>9<sup>th</sup> February 2016</b>
<b>AGENDA ITEM:</b>	<b>12</b>
<b>SUBJECT:</b>	<b>North-Croydon Area-Wide 20mph Speed Limit</b> <b>(Statutory Consultation-Report on objections)</b>
<b>LEAD OFFICER:</b>	<b>Jo Negrini</b> <b>Executive Director - Place</b>
<b>CABINET MEMBER:</b>	<b>Councillor Kathy Bee</b> <b>Cabinet Member for Transport and Environment</b>
<b>WARDS:</b>	<b>South Norwood, Upper Norwood, Selhurst, Bensham Manor, Thornton Heath, Norbury and West Thornton</b>
<p><b>CORPORATE PRIORITY/POLICY CONTEXT:</b></p> <p><b>This project addresses the corporate policies adopted in the Corporate Plan 2015-2018 to enable Growth, Independence and Liveability. This report helps address the Liveability strategy of the Plan with particular emphasis on the Transport vision to:</b></p> <ul style="list-style-type: none"> <li>• Implement the 20-year Transport Vision to improve safety and access for all road users, particularly pedestrians, cyclists and people travelling by public transport.</li> <li>• Implement an area-wide 20mph maximum speed limit scheme across Croydon, on an area by area basis, subject to public consultation in each area.</li> </ul>	
<p><b>AMBITIOUS FOR CROYDON &amp; WHY ARE WE DOING THIS:</b></p> <p>As part of Ambitious for Croydon, there are plans to improve the way that the council delivers on its roads and transport agenda, including :</p> <ul style="list-style-type: none"> <li>• Supporting 20 mph speed limits in residential areas where the communities want them.</li> <li>• Improve safety for cyclists and pedestrians. Ensure that these policy initiatives are embedded within the developing Transport Vision.</li> </ul>	

## **FINANCIAL IMPACT**

The cost of implementing an area-wide 20mph speed limit across North-Croydon is estimated to be £300,000. The cost of this proposal is to be met from the TfL allocation secured through the Local Implementation Plan (LIP) for 2015/2016.

## **KEY DECISION REFERENCE:**

**04/16/TE** - This is a Key Decision as defined in the Council's Constitution. The decision may be implemented from 1300 hours on the expiry of 5 working days after it is made, unless the decision is referred to the Scrutiny & Overview Committee by the requisite number of Councillors

## **1. RECOMMENDATIONS**

That the Traffic Management Advisory Committee recommend to the Cabinet Member for Transport and Environment that they

- 1.1 Consider the objections received in response to the giving of public notice and the officer comments on these at Appendix A and agree, that the Highway Improvements Manager, Streets Division be authorised to make the necessary Road Traffic Management Orders under the Road Traffic Regulation Act 1984 (as amended) so as to implement the maximum 20mph speed limit for North Croydon area as identified on Plan HWY-MPH-1269-001 (TMO) on or after 18<sup>th</sup> February 2016.

## **2. EXECUTIVE SUMMARY**

- 2.1 This report details the objections received in response to the giving of public notice on the council proposal to change the maximum speed limit for the majority of roads in North-Croydon area to 20mph (the proposal, as identified on Plan HWY-MPH-1269-001 (TMO), the officers comments on these and seeks a recommendation that the Council proceed with making the necessary Traffic Management Order in order to implement the proposal.
- 2.2 Copies of those objections and officer comments are at Appendix A to this report.

## **3. DETAIL**

### **3.1 BACKGROUND**

- 3.1.1. On 16 September 2014, the council's 'streets and environment scrutiny sub-committee' considered an officer report titled '20mph proposal for Croydon'. The report can be accessed at <https://secure.croydon.gov.uk/akscroydon/users/public/admin/kab14.pl?operation=SUBMIT&meet=2&cmt=SES&grpid=public&arc=1>

The sub-committee debated the potential effects of reducing the speed limit to 20mph in residential and built-up areas of the borough and considered the

evidence from schemes currently in place (such as Portsmouth, Bristol, Islington and Camden), road safety data and enforcement issues by listening to the views of a range of organisations/campaign groups such as the Metropolitan Police, Living Streets, Institute of Advanced Motorists, 20s Plenty for Us, Croydon Cyclists.

3.1.2. In November 2014, a working group consisting of the Cabinet Member for Transport and Environment, council officers, the Metropolitan Police and a representative from 20's plenty for Us, Croydon Cycling Campaign and Living Streets was set up to consider the various aspects of the proposal. The group is known as the '20mph Working Group'. Following a series of meetings by the working group, it was agreed that an area-wide 20mph proposal across Croydon would best be dealt with by treating one area at a time, of a sufficient size such that over a three year period the whole of Croydon will have had the opportunity to consider whether or not they would support the lowering of the maximum speed limit in their area.

3.1.3. Officers made a further report to the council's Cabinet meeting in March 2015 outlining how the project would be taken forward. The report also provided details on the first area (North-Croydon) from which officers would seek 'opinion' to gauge the level of support amongst its residents and businesses. Following approval of the officer recommendations Officers set about putting the 'opinion survey' in place.

3.1.4. The 'opinion survey' for North-Croydon area was carried out between 13 May and 26<sup>th</sup> June 2015. The results showed that 52.5% of respondents were in favour of lowering the speed limit compared to 46.4% against. The remainder 1.1% were undecided. These results were contained in a delegated officer report to the Executive Director of Place, who on 6<sup>th</sup> November 2015 approved the officer recommendation to proceed with a statutory consultation.

3.1.5. The public notice in respect of the North-Croydon area maximum 20mph proposal was given on 25 November. The period for responses ended on 24<sup>th</sup> December 2015. The details of responses are provided in the following section.

3.1.6. STATUTORY CONSULTATION (objection common themes)

All objection letters together with a full detailed officer response to each is contained in Appendix A of this report. Below is a summary of the commonly observed objections to the proposal and the officer's response to this.

3.1.7. **Although some roads may be suitable for a 20mph limit not all are.**

The officer response to this objection is that Croydon has not included the 'A road network' within the maximum 20mph speed limit proposal so this is not a blanket cover across the whole of the North Croydon area. Also the council's recent speed surveys in various roads of the area in question (327 directional speed surveys) of which 52 directions showed existing average speeds above 24mph. The speed surveys were carried out on residential roads for which the maximum 20mph speed limit is proposed. Given that such a large part of the North-Croydon area already has low average speeds is encouraging and makes them suited to have a lower maximum speed limit of 20mph.

3.1.8. **The scheme is a stealth tax and revenue generator for the council.**

The officer response to this objection is that that this is a misconception and actually revenue generated from any speeding fines is passed onto central government. Neither the Police nor the council get such revenue.

### 3.1.9. **The scheme will penalise people for going a little over at 22mph.**

The officer response is that this is not seen in practice and that the new 'Association of Chief Police Officers (ACPO) guidance on enforcement of 20mph speed limits recommends that in 20mph areas, drivers caught at speeds between 24-31mph should be offered the option of either attending a speed awareness course or receive a fixed penalty notice.

### 3.1.10. **Slow speeds will make air quality and fuel economy worse,**

The officer response is that the findings of The Centre for Transport Study at Imperial College London reported the following impact of lower speed limits on vehicle emissions for vehicles with an engine size of up to 2.0 litres.

- 1) Nitrogen Oxide emissions are higher for petrol vehicles at 20mph compared to 30mph whilst for diesel cars they are lower at 20mph compared to 30mph.
- 2) The Particulate Matter was lower for both petrol and diesel cars at 20mph when compared to 30mph for vehicles with engine size less than 2.0 litres. Carbon dioxide emissions are higher for petrol vehicles at 20mph compared to 30mph whilst for diesel cars they are lower at 20mph compared to 30mph

Whilst the study concluded that the effects on vehicle emissions are mixed, it does not account for potential associated impacts of speed restrictions, such as congestion or encouragements to shift mode to walking/cycling as a result of a more attractive environment for active travel.

With regard to driving styles, the same study observed that, across several routes in central London, a greater range of speeds occurred on 30 mph segments compared to 20mph segments. Average speed was higher on 30mph segments and, when restricted to speeds observed during cruising, was statistically significant. In addition, a large proportion of time was spent accelerating and decelerating on 30 mph segments suggesting that 20 mph routes may facilitate smooth driving.

The study identified the need for further research into emissions resulting from non- exhaust sources including brake and tyre wear.

### 3.1.11. **There are more accidents in 20mph zones compared to 30mph areas.**

The officer response is that there is strong evidence that 20mph zones result in significant casualty reductions, although the available studies focus on zones with physical traffic calming.

A number of general studies have been undertaken that investigate and analyse the impacts of 20mph zones and limits, both in London and England. There are four main studies that are most relevant, and their key findings regarding accident reductions are summarised below.

- 1) Webster DC & Mackie AM (1996) Review of traffic calming schemes in 20mph zones (TRL Report 215) found;
  - a) *61% reduction in accidents and 70% reduction in killed or seriously injured (KSI) accidents (no adjustment for background trend).*
  - b) *63% reduction in pedestrian injury accidents, 29% reduction in pedal cyclist injury accidents, 73% reduction in motorcyclist injury accidents, 67% reduction in child (pedestrian and cyclist) injury accidents.*
- 2) Webster DC & Layfield RE (2003) Review of 20mph zones in London Boroughs (TRL Report PPR243) found;
  - a) *Adjusting for background changes, 45% reduction in casualties and 57% reduction in KSI casualties.*



- b) *Adjusting for background changes, 45-60% reduction in child KSI casualties, 39-50% reduction in pedestrian KSI CASUALTIES, 30-50% in pedal cyclist KSI casualties and 68-79% reduction in powered two wheeler casualties.*
- 3) Grundy et al (2008a) 20mph zones and Road safety in London, London School of Hygiene and Tropical Medicine found;
  - a) *42% reduction in casualties in 20mph zones (taking into account background changes).*
- 4) Grundy et al (2008b) The effect of 20mph zones on inequalities in Road Casualties in London, London School of Hygiene and Tropical Medicine found;
  - a) *20mph zones historically targeted at high casualty, high deprivation areas, therefore helped to reduce inequality.*

**3.1.12. The Police have better things to do than setting speed traps/ limited resources means there will be no enforcement etc.**

Officers response is that the Metropolitan Police are responsible for enforcing all speed limits across London and the council has liaised with them regarding enforcement of the new speed limit. The Police have been clear in their position that their enforcement efforts of the proposed maximum 20mph speed limit for North-Croydon area will be at the same level as that used to enforce the existing 30mph/ or other speed limits in the borough. With regards to specific /targeted enforcement this is only likely to be at sites where there is a real and persistent problem.

In their response to the statutory consultation, the Police have confirmed that they have no objection to the scheme.

**3.1.13. Council has dragged in spurious arguments such as tackling obesity to support its unreasoned 20mph speed limit proposal.**

The officers response is that the council's duty towards health of its residents is as follows. Public health and traffic management are both duties which the local authority has a duty to take account of when considering its policies.

The Traffic Management Act 2004 places a duty on highway authorities to secure the expeditious movement of traffic on their network. This is often wrongly perceived as motorised traffic only and used as an argument against 20mph schemes. However this narrow interpretation does not reflect the whole meaning of this requirement, as 'traffic' encompasses all modes of transport using roads, including pedestrians. The duty is essentially about balancing the needs of all road users, and also operates alongside other duties, including those in the area of road safety. This is made clear in the DfT's Network Management Duty Guidance.

Under the Health and Social Care Act 2012, local authorities took on a number of public health responsibilities in April 2013. This is of relevance, given the strong links between road safety and public health, which has been recognised by a number of local authorities.

**3.1.14. The scheme will increase journey times.**

The officers response is that journey time is dependent on a number of factors of which the maximum speed limit is an influencing factor. In general, side roads/residential roads are seen as a means of access to and from the main road network and therefore not designed to cater for large volumes of through-traffic. The council has not proposed to change the maximum speed limit to 20mph on the main road network which is designed to cater for through-traffic.

Given these facts, the extra delay caused as a result of lowering the maximum speed limit to 20mph can only be attributed to a very small part of the typical journey. On average such a journey is likely to be less than 800 metres or ½ mile from ones home to the main road network and so the extra delay would hardly be noticeable. A vehicle driving at a constant 30mph compared to one which drives in exactly the same conditions but at 20mph would in theory be quicker by 26 seconds to cover 800 metres (½ mile). The actual experienced delay is likely to be even smaller for the further reasons given below.

From the collection of speed data across various roads across North Croydon it would appear that 85% to 95% of the roads have existing average speeds 24mph or less. This is less than the assumed 30mph used in the calculations above and hence the actual experienced delay is likely to be even less than 26 seconds.

**3.1.15. Most injury accidents occur on main roads, not where this speed limit is proposed.**

The officers response is that main roads are designed to be main thoroughfares and carry larger volumes of traffic; motor vehicles, cyclists and pedestrians. This naturally leads to a larger number of conflicts. The main roads also play a different role in the hierarchy of road network; most fundamental of which is to ensure the expeditious movement of all traffic. Although a 20mph speed limit on main roads would undoubtedly go some way in reducing the number and severity of conflicts, it may also prove counterproductive and cause considerable delay as the major part of a typical journey is carried out along the main roads. This is not to say that accident remedial action should be omitted for the main roads but rather that this is achieved using different engineering solutions. Main roads have considerably greater road space and good sightlines compared to residential streets thereby allowing for more innovative and expensive measures to be put in place. Costly measures such as controlled pedestrian crossings or footway buildouts, enforcement cameras, signalised junctions etc. are more justified on main roads where usage is likely to justify the costs.

A 30mph speed limit is generally considered appropriate for the main road network which is generally wider and has the necessary infrastructure/capacity to support the higher speed limit, whilst residential roads have many physical constraints which makes 20mph more suited for those roads.

**3.1.16. Each road should be considered individually and residents should support the change.**

The officer response to this objection is that, prior to the start of the 'opinion survey' with residents/businesses in May/June 2015, it was agreed by the council that the maximum 20mph proposal for North-Croydon was proposed as a scheme for the whole area and would only be considered for implementation if the majority of respondents from within the North-Croydon area supported it. This was also communicated to the residents and businesses in the area through the literature produced for the scheme proposal such as the Frequently Asked Questions and newsletter which were made available online and as a paper copy.

Side roads connect to other side roads and more often than not, will have several junctions with other side roads. If half the roads voted for a change to 20mph whilst the other half voted to retain 30mph we could end up with a proliferation of large signs; littering every junction throughout the area. One

section of road could be 20 whilst the next section is 30 and so on. This would not be considered a very wise engineering solution and the patchwork of 20/30 streets would cause confusion and accidents would certainly increase many fold.

Accident reduction is highly desirable for both the council and its residents however it is recognised that a change such as lowering of the maximum speed limit over an area should be made with support from the residents. This was determined from the 'opinion survey' carried out with residents/businesses in May/June 2015. It was also obvious that not all 34,000 households within the area were going to have a unanimous view on the proposal therefore it was made clear to participants that the scheme would only be proceeded with if the majority of respondents agreed.

The proposal was well publicised using a number of means which ranged from on-street notices in every road, press releases, use of social media, a dedicated webpage on the councils website and much more. A leaflet drop was also made to all properties in the area. Residents were made aware on the importance of their response and how this would be used in the decision making process. The results of the opinion survey showed that the majority of respondents supported the council proposal.

The proposal is also justified on safety grounds and the numerous ways in which this could encourage residents to take up walking and cycling and the resulting benefits to society in general.

**3.1.17. On many of these roads, it is often normal and safe to drive around 25mph, so it would be wrong to force everyone to go no more than 20mph.**

The officer response to this is that the current legal speed limit for many of the roads in the North-Croydon area is 30mph which is also the speed limit for the main 'A' road network and yet the difference between the two networks is significant. Whilst it may appear safe from the comfort of a car to drive at 25mph in a narrow residential street with dense parking, this perception of safety is not the same from a pedestrian (especially children and the elderly) or a cyclist's perspective.

Child pedestrians in particular appear to be more vulnerable, as one study suggests that children do not perceive looming objects (such as an approaching vehicle) as an adult would. It was found that under most viewing conditions, children could not reliably detect a vehicle approaching at speeds greater than 25mph. As such the study concludes that lower vehicle speeds reduce the risk of severity and severity of child pedestrian casualties, not only because of lower impact speeds but also because there is a lower probability of a child stepping out in front of a vehicle in the first instance. The report referred to is 'Wann JP et al (2011) Reduced sensitivity to visual looming inflates the risk posed by speeding vehicles when children try to cross the road in Psychological Science, 22(4), pp429-434.

In the recent opinion survey which the council put forward to residents and businesses in the North Croydon area, 49.64% of respondents agreed whilst 34.89% disagreed that the council proposal would help to reduce road accidents and the severity of collisions that may still occur.

The same opinion survey also revealed that that 20.31% of respondents could take up walking and 21.45% would consider cycling following introduction of the new speed limit.

The council's speed survey data for North-Croydon shows that 85-95% of roads within North Croydon have average speeds of 24mph and less. This is significant in establishing that actually the majority of roads are suited for a maximum 20mph.

#### 4. STATUTORY CONSULTATION

- 4.1.1. The Public Notice for the North-Croydon area maximum 20mph speed limit appeared in the Croydon Guardian on 25<sup>th</sup> November 2015. The Notice was also put in the London Gazette as required by regulations. The Notice and draft Traffic Order which is to be confirmed subject to approval of the scheme are attached as Appendix B to this report.
- 4.1.2. In order to ensure that in particular residents and businesses were made aware of the statutory consultation, officers put up approximately 2500 public notices on lamp columns in every street in the area. The street Notice is attached as Appendix C to this report.
- 4.1.3. The council wrote to emergency services and public bodies which is usual practise and a regulatory requirement when carrying out a statutory consultation.
- 4.1.4. Information regarding the statutory consultation and how to make representation was also placed in the public notices and on the council website.
- 4.1.5. Twenty three representations were received against the North-Croydon maximum 20mph proposal, seven of which had the same content but sent in by different individuals. The representations together with the proposed officer response are attached in Appendix A. All received objections must be considered carefully and a determination made as to whether it is material or not. It is usual to provide an officer response to objections and the Council should consider these before determining whether or not to uphold an objection.
- 4.1.6. It should be noted that the purpose of a public notice in relation to a statutory consultation is to invite objections to the scheme and not to gauge levels of support.
- 4.1.7. Although letters of support for the scheme are not invited for a statutory consultation, six were received and also attached within Appendix A.
- 4.1.8. A letter of 'No objection' was received from the Metropolitan Police, the contents of which are attached at the end of the Appendix A.

#### 5. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

##### 5.1

##### 1. Revenue and Capital consequences of report recommendations

Current year	Medium Term Financial Strategy – 3 year forecast		
	2016/17	2017/18	2018/19
2015/16	2016/17	2017/18	2018/19
£'000	£'000	£'000	£'000

**Revenue Budget  
available**

Expenditure

Income

**Effect of decision  
from report**

Expenditure

Income

**Remaining budget**

**Capital Budget  
available**

Expenditure

**Effect of decision  
from report**

Expenditure

**Remaining budget**

	<hr/>	<hr/>	<hr/>	<hr/>
	300	0	0	0
				0
	300	0	0	
	<hr/>	<hr/>	<hr/>	<hr/>
	300	0	0	0

2. The effect of the decision

This scheme is funded by Transport for London (TfL) from the Council's 2015/2016 Local Implementation Plan allocation. A decision to proceed will result in that allocation being spent partially or wholly.

3. Risks

There is a risk that if the current scheme for North-Croydon area is not agreed to proceed, the allocated £300,000 may not be fully spent. Any unspent monies will need to be reallocated to other highways projects or returned to TfL. Although the scheme would start in the current financial year any underspends may be through TFL vovd changes slipped into future years.

4. Options

The only alternative option is to do nothing should this recommendation not proceed.

5. Future savings/efficiencies

Although there will be no direct savings and efficiencies as a result of this scheme there may be indirect savings within the Council and with partner organisations if casualty rates are reduced as a result of implementation.

Approved by: Louise Lynch, Business Partner, Place Department

**6. COMMENTS OF THE COUNCIL SOLICITOR AND MONITORING OFFICER**

The Council Solicitor comments that Section 6, 124 and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984 (as amended) provides powers to introduce, vary and implement Traffic Management Orders. In exercising this power, section 122 of the Act imposes a duty on the Council to have regard (so far as practicable) 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. The Council must also have regard to such matters as the effect on the amenities of any locality affected.

The Council needs to comply with the necessary requirements of the Local

Authorities Traffic Order Procedure (England and Wales) Regulations 1996 by giving the appropriate notices and receiving representations. Such representations must be considered before a final decision is made.

Approved by: Gabriel MacGregor, Head of Corporate Law on behalf of the Council Solicitor and Monitoring Officer

## **7. HUMAN RESOURCES IMPACT**

7.1 There are no human resources implications arising from this report

Approved by Adrian Prescod, HR Business Partner, for and on behalf of Director of HR, Resources department.

## **8. EQUALITIES IMPACT**

8.1 The Council is proposing the introduction Croydon Area Wide 20mph Speed Limits to improve road safety through a reduction in the number of injury collisions, to encourage walking and cycling, thus making a positive contribution to improving health and tackling obesity, improving accessibility, reducing congestion, improving the local environment, improving the quality of life for all groups (including those that share a protected characteristic) and strengthening community cohesion.

8.2 The proposal is likely to improve conditions for all the protected groups and has the potential to ease community severance by aiding the development of healthy and sustainable places and communities. In reducing the perception of road danger the scheme should enable the protected groups to make more and better use of their local streets

8.3 The proposal is likely to benefit in particular, certain groups that share a “protected characteristic such as people with a disability, older people and children in providing additional road safety (as pedestrians), whilst in comparison the more able pedestrians would benefit to a lesser degree.

8.4 An initial equalities impact assessment has been carried out on this proposal and it is considered that a full assessment is not necessary at this stage, as the changes are likely to benefit a number of groups that share a “protected characteristic” as detailed in the initial assessment. However the scheme if implemented should be monitored as it progresses and if any negative impact on the protected groups do emerge, a full assessment will be carried out to identify any mitigating actions that may be required.

## **9. ENVIRONMENTAL IMPACT**

9.1 Road casualty reduction is a Public Health priority. It is anticipated that the reduction in speed limits to 20mph in residential and commercial areas will help to reduce collisions and the severity of the outcome of some collisions. It is estimated that over 95% of pedestrians involved in a collision at 20mph survive, compared with only 80% at 30mph (ROSPA factsheet). A review of the impact of introducing 20mph zones in London over a twenty year period (Grundy et al 2009) demonstrated a reduction in road casualties particularly amongst young children. It is likely that the scheme will support people to choose more physically active lifestyles by opting to make healthier active

travel choices such as walking and cycling which in turn will help to reduce emissions and improve air quality by reducing congestion.

## **10. CRIME AND DISORDER REDUCTION IMPACT**

10.1 There are no direct implications arising from the proposals.

## **11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

11.1 The proposed scheme should assist the Council in encouraging more sustainable transport use such as walking and cycling by reducing vehicle speeds and improving safety and the perception that the streets are safer and more user friendly. Any modal shift to more sustainable transport achieved as a result of the wider implementation of 20mph speed limits will also assist in improving air quality and reducing carbon emissions contributing to the Council's objectives

## **12. OPTIONS CONSIDERED AND REJECTED**

12.1 A 20mph zone was considered for the area, however this was rejected on the grounds of high cost because a zone must be self-enforcing, which would require extensive traffic calming features.

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### BACKGROUND PAPERS -

- 1) Delegated officer report titled '*North-Croydon Area-Wide 20mph Speed Limit (Opinion survey Results)*' and Executive Directors decision dated 6 November 2015. The report can be viewed on the Council website.

**Objection 001**

Dear Sirs,

I object to the 20mph limit going ahead on Croydon as there appears to be no proper enforcement, and in many cases no reason for so many roads to have a blanket 20 mph limit imposed on all roads. The funding should be targeted towards properly identified zones where there have been recorded accidents and near misses, to cover all areas within Croydon shows no innovation or common sense towards road safety. Going by some recent road closures and redirection of local traffic I think it would be wiser to go in for some proper locally focussed consultation to identify real areas of road safety concerns.

**Officer response**

The Metropolitan Police are responsible for enforcing all speed limits across London and the council has liaised with them regarding enforcement of the new speed limit. The Police have been clear in their position that their enforcement efforts of the proposed maximum 20mph speed limit for North-Croydon area will be at the same level as that used to enforce the existing 30mph/ or other speed limits in the borough.

The proposal aims to improve road safety through a reduction in the number of injury collisions, to encourage walking and cycling, thus making a positive contribution to improving health and tackling obesity, to improve accessibility and reduce congestion, and improve the local environment, quality of life and community cohesion. This is in line with the council's overall objective to increase road safety and encourage safer sustainable modes of transport.

Speed survey data was recently collected at 168 sites on various roads in North Croydon which totalled to 327 directional speed surveys across the region. The roads chosen for the speed surveys were those that were likely to have relatively higher speeds as they did not have traffic calming. The collected data showed that only 52 directions were found to have existing speed measurements above 24mph which is the DfT advised maximum when considering roads for a 20mph speed limit. From the speed survey sample, we can conclude that approximately 85% of the roads within the North-Croydon area are already suited for implementing the 20mph speed limit. Had existing traffic calmed roads also been included for the collection of speed survey data, it is possible that the 85% statistic could have been in the region of 95%. Given that such a large part of the North-Croydon region is suited to a 20mph proposal, it would be irrational to leave a small number of residential roads as 30mph.

The council agrees with your viewpoint that not every road in the North-Croydon area is suitable for a lowering of the speed limit and hence the very reason that the full 'A' road network (with exception of Grange Road) is proposed to retain the existing 30mph speed limit.

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**Objection 002**

I am not in favour of the proposed 20 per hour driving restriction as it is seen as sharp practice for the entrapment of motorist whom already suffer too many stealth taxes for the necessity of driver.

My wife is disabled so we need a car and do not want to potentially be entrapped into speeding fines for going over 20 mph.

If you have driven in Islington you will know how difficult it is to drive at this snails pace with a clear road ahead.

This is a very bad design.

**Officer response**

The Metropolitan Police are responsible for enforcing all speed limits across London and the council has liaised with them regarding enforcement of the new speed limit. The Police have been clear in their position that their enforcement efforts of the proposed maximum 20mph speed limit for North-Croydon area will be at the same level as that used to enforce the existing 30mph/ or other speed limits in the borough. From this, one can assume that specific /targeted enforcement is only likely to be at sites where over speeding remains a persistent problem. The new 'Association of Chief Police Officers (ACPO) guidance on enforcement of 20mph speed limits recommends that in 20mph areas, drivers caught at speeds between 24-31mph should be offered the option of either attending a speed awareness course or receive a fixed penalty notice.

The proposal aims to improve road safety through a reduction in the number of injury collisions, to encourage walking and cycling, thus making a positive contribution to improving health and tackling obesity, to improve accessibility and reduce congestion, and improve the local environment, quality of life and community cohesion. This is in line with the council's overall objective to increase road safety and encourage safer sustainable modes of transport.

Any revenue generated through the collection of speeding fines is passed to Central Government and neither the Police nor council benefit directly from it. The cost benefit calculation for this scheme is based on accident savings and the resultant benefit to society/individuals and not potential revenue generation.

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**Objection 003**

Hello,

I object to this proposal apart from near schools.

It achieves nothing - motorists ignore it and if there are speed cameras they just slow down where the camera is placed and then speed back up to 30.

Please register my objection.

**Officer response**

Whilst I do not dispute that some drivers will on occasion ignore a maximum speed limit, it is also common observation that the level by which they are likely to exceed it is directly proportional to the actual speed limit itself.

Transport consultant Atkins carried out an evaluation of Portsmouth City Council's 20mph area wide scheme. The study revealed that where average traffic speeds before the installation of the maximum 20 mph speed limit were above 24 mph, the speeds were significantly reduced, by around 7 mph following the new speed limit. This reduction in speed is higher than the average reduction of 1-2mph commonly reported for new 20 mph signed only limit areas. Early evidence from the Portsmouth scheme also suggested that overall casualty benefits above the national trend were likely.

Research carried out by DfT showed that a one mph reduction in speed resulted in a 6% reduction in collisions. In 2013 the Mayor and TfL published Safe Streets for London - an ambitious and comprehensive plan to make the roads safer for everyone who uses them. This includes a road safety target for London to reduce the number of people killed or seriously injured on London's roads by 40% by 2020, delivering a total reduction of 10,000 casualties by the end of the decade.

Previously, the Mayor and TfL published six commitments that are guiding initiatives to deliver this, and action is being taken to prioritise the safety of the most vulnerable road users - pedestrians, cyclists and motorcyclists - who account for 80% of those killed and seriously injured on the Capital's streets. The council's maximum 20mph speed limit proposal for North-Croydon is in line to help achieve the targets set by the Mayor of London.

Speed survey data was recently collected at 168 sites on various roads in North-Croydon area which totalled to 327 directional speed surveys across the region. The roads chosen for the speed surveys were those that were likely to have relatively higher speeds as they did not have traffic calming. The collected data showed that only 52 directions were found to have existing speed measurements above 24mph which is the DfT advised maximum when considering roads for a maximum 20mph speed limit. From Croydon's speed survey sample, we can conclude that approximately 85% of the roads within the North-Croydon area are already suited for implementing the 20mph speed limit. Had existing traffic calmed roads also been included in the collection of speed survey data, it is possible that the 85% statistic could have been in the region of 95%. Given that such a large part of the North-Croydon region is suited to a maximum 20mph speed limit, it would be irresponsible of the Council to leave a small number of residential roads at 30mph.

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**Objection 004**

Dear Sirs,

Please take record our objections to the above proposal.

Please note that the Alliance of British Drivers (ABD) is not opposed to 20 mph speed limits in all locations - for example where the natural speed of traffic is near that speed. In many residential streets that is the case. However we are opposed to blanket wide area 20-mph limits because they are not a cost effective road safety measure, are not likely to be complied with and needlessly slow traffic.

1. It is clear that the proposals for North Croydon will cost a considerable sum of money (£300,000 according to the somewhat biased "FAQ" document on the scheme). The key question is whether the benefits of that expenditure outweigh the costs, i.e. that it is a superior cost/benefit ratio to spending that money on other things. I will cover that issue below. But it is worth noting that your FAQ document claimed that the scheme is not being funded from council tax revenue - that is grossly inaccurate as although the money is coming from Transport for London (TfL), as you are well aware TfL is part of the Greater London Authority which is partly funded by the local council precept and otherwise by central Government from taxation. To suggest that it is not funded by council tax revenue is not only wrong but clearly misleading in a more general sense as this project will be funded by taxes paid by the general population directly or indirectly, including the residents of Croydon.

2. In general the benefits of 20 mph signed area wide area schemes are grossly exaggerated. The average reduction in the speed of traffic is typically about 1 mph (assuming that there is no bias in the collection of data or other influences that might affect traffic speeds which is a dubious assumption). That speed reduction is not likely to have a significant or measureable impact on road traffic accidents and not have any impact on the general environment of the roads concerned. Neither is it likely to encourage cycling or walking or discourage driving so the general health benefits will be nil - indeed there is no good evidence yet available for any such positive benefits (cities such as Bristol have claimed such benefits but their evidence is statistically dubious in the extreme).

3. Your FAQ document suggested that if a 20 mph scheme was implemented across the whole of the borough, only 22 accidents would need to be saved at an average cost of £68,000 for the scheme to be cost effective. There are two problems with that claim which are 1) the average cost of an accident of £68,000 from the DfT is not a real cost (i.e. expense incurred) but is mostly made up of what people would be willing to pay to avoid such accidents - they clearly give a most optimistic figure when asked; and 2) there is no good evidence that 20 mph sign only schemes provide any real, statistically significant, and below trend accident reduction.

The suggestion from Research by the DfT that a 1% reduction in traffic speed

translates into a 6% reduction in collisions is not borne out by the real world evidence but is based on a biased analysis of traffic speeds on different types of roads. There has been no proper "controlled" trial of the use of signed only speed limits. The results in Portsmouth (which are mentioned in your FAQ document as providing 21% reduction in collisions) do not provide firm evidence that there is any real benefit. Indeed KSIs in Portsmouth actually rose. I wrote this article on the bias inherent in the claims by Portsmouth that gives more information:

[http://www.freedomfordrivers.org/Portsmouth\\_20Mph\\_Zones.pdf](http://www.freedomfordrivers.org/Portsmouth_20Mph_Zones.pdf)

4. More evidence. Historically there was a 20-mph speed limit across the whole of the UK before 1930 when accident figures were much higher. Accidents fell after it was removed. See this note for more information:

<http://www.freedomfordrivers.org/20Mph%20Speed%20Limits%20%20The%20Historic%20Evidence.pdf>

5. It is also worth pointing out that the Department of Transport (DfT) have recently commissioned a three year study into the effectiveness of 20 mph schemes as they suggest that current evidence is "inconclusive". It would be rash of Croydon council to spend large amounts of money on any 20 Mph, signed only, schemes before more evidence is available on their financial benefit and effectiveness.

6. In general the evidence put forward by those who support 20 mph wide area speed limits as a road safety measure is dubious and I would welcome the opportunity to contradict any that you receive. They often rely on selection of the data while ignoring other factors that might affect the results. In practice, their understanding or statistical evidence and the scientific method is weak in the extreme.

7. So the key question, is whether spending £300,000 on such a scheme is worthwhile, or whether it would not be better to spend it on other road safety measures!

Regrettably a proposal to reduce traffic speeds looks both simple and attractive which is why politically it can appear to be sensible. But road safety is a much more complex matter that is not amenable to simplistic solutions. Smaller, focused road safety schemes would be likely to create much more benefit than putting up 20 mph signs everywhere (which will of course be ignored by many road users who will consider it an inappropriate speed for many roads in Croydon).

8. Imposing a speed limit that is lower than necessary will slow traffic of all kinds, and will not be adhered to unless there is massive expenditure on enforcement (which of course has been ignored in the cost/benefit calculations as has the cost of increased travel times).

9. I must also point out that the public "consultation", or "opinion survey", conducted by the council in respect of this matter was grossly defective and open to fraud.

As you are no doubt aware, we made previous representations about the proposed 20 mph wide area speed limit in North Croydon and we were keen to see a fair and open consultation on this matter. To that end we circulated a leaflet to residents encouraging them to respond to the consultation by the normal method, i.e. via your web site which is the normal process for public consultations nowadays. We understood that paper responses would only be made available on demand as noted in council reports on the consultation.

Although the results of the consultation suggest that there was an overall majority in favour, the split between on-line submissions and paper show a very different story. They give 42.5% FOR versus 53.1% AGAINST on the on-line submissions (total 2824 submissions) but 90.7% FOR versus 4.0% AGAINST in the paper submissions (total 535). Now anyone who has been involved in public consultations knows that it is very rare, if not impossible, to get a response of more than 90% in favour of anything. And clearly the paper responses swung the overall vote. Why should the results be so different on paper responses to on-line?

How was this achieved on the paper responses? Allegedly by some councillors and their supporters actually taking masses of paper forms and getting personal signatures on them by canvassing. One way to rig the result is simply to discourage those opposed from signing, or to discard those completed by those not in favour. Or of course it could be by simple submission of fraudulent entries which is a lot easier to do on paper than on-line.

In essence the results of this consultation are dubious in the extreme and I therefore ask that you discount the result and do not consider it a fair and honest representation of the views of the wider community.

I would also point out that the Council has a legal obligation to ensure that public consultations are fair and unbiased. This one was not from the very start when the information provided to residents was one-sided.

Now we see that it appears that Labour councillors (I am of course aware that it was a manifesto commitment), and other supporters of 20 mph schemes, are so dedicated to forcing through this proposal that they will use the most dubious, and indeed fraudulent, tactics to do so.

Finally, let me say that these proposals are being put forward by those who have little understanding of road safety or how to reduce accidents. In reality it is "gesture politics" of the worst kind. It is likely to result in fewer reductions in road casualties, and hence possibly more deaths, by wasting money that would be better spent on other road safety measures.

### **Officer response**

It is noted that in part, your opposition/objection to the scheme is because you do not consider this to be a cost effective road safety measure or one which is likely to be complied with but will needlessly slow traffic. I find this somewhat

ambiguous because, if the scheme results in the slowing of traffic then one would reasonably assume that it is being complied with or in the very least, moving in the direction of compliance. I can confirm (from recently collected speed data) your belief that for many residential streets in the North-Croydon area, traffic speed is already likely to be low enough for those streets to be considered suited for the proposed speed limit change. I hope my below response will alleviate some of the other concerns you have expressed and help understand how the council proposal carries many benefits and achieves the right balance of need for all road users.

Croydon council recently collected, 7 day speed survey data on various roads in the North Croydon area. Data was collected at 168 sites making a total of 327 directional surveys. The data was collected for a number of reasons such as to:

- 1) Establish the suitability of converting the roads in North-Croydon to a maximum 20mph speed limit.
- 2) Draw a comparison between existing speeds and those determined following the change in speed limit in the future.

Roads chosen for the speed surveys were those for which the 20mph speed limit is proposed and, were likely to reveal the highest travel speeds as they have no existing traffic calming along them. The data collected showed that only 52 of the 327 directions surveyed had existing average speed measurements above 24mph which is the Department of Transport (DfT) advised maximum when considering roads for a 20mph speed limit. From the speed survey sample, we can reasonably conclude that approximately 85% of the roads within the North-Croydon area are already suited for implementing the maximum 20mph speed limit. Had existing traffic calmed roads also been included in the collection of the speed survey data, it is possible that this figure may have been as high as 95%. Given that such a large part of the North-Croydon region is suited to a 20mph proposal, it would be irresponsible of Croydon to leave a small number of residential roads as 30mph to bear the burden. This would understandably be objectionable for residents within those roads for a variety of valid reasons.

Research carried out by DfT showed that a one mph reduction in speed resulted in a 6% reduction in collisions. In 2013 the Mayor and Transport of London (TfL) published Safe Streets for London - an ambitious and comprehensive plan to make the roads safer for everyone who uses them. This includes a road safety target for London to reduce the number of people killed or seriously injured on London's roads by 40% by 2020, delivering a total reduction of 10,000 casualties by the end of the decade.

Last February, the Mayor and TfL published six commitments that are guiding initiatives to deliver this, and action is being taken to prioritise the safety of the most vulnerable road users - pedestrians, cyclists and motorcyclists - who account for 80% of those killed and seriously injured on the Capital's streets. The council's maximum 20mph proposal for North-Croydon is in line to help achieve the targets set by the Mayor of London.

In the recent opinion survey which the council put forward to residents and

businesses in the North Croydon area, 49.64% of respondents agreed whilst 34.89% disagreed that the council proposal would help to reduce road accidents and the severity of collisions that may still occur.

The same opinion survey also revealed that 20.31% of respondents could take up walking and 21.45% would consider cycling following introduction of the new lower speed limit. Officers believe that the change brought about by the lowering of the speed limit will lead to accident cost savings and a healthier lifestyle and so help achieve the council ambitions to make Croydon a sustainable, connected and caring city.

The figure of £68,000 per cost of accident is one which Department of Transport has calculated and suggested should be used in the appraisal of transport schemes. Since 1993, the valuation of both fatal and non-fatal casualties has been based on a consistent willingness to pay (WTP) approach. This approach encompasses all aspects of the valuation of casualties, including the human costs, which reflect pain, grief, suffering; the direct economic costs of lost output and the medical costs associated with road accident injuries.

The fundamental proven fact behind a 20mph scheme is that the speed limit – if adhered to – reduces the risk of road accidents occurring and presents a strong chance of avoiding fatal or serious injuries if one does occur. In built up residential areas, the ‘Royal Society for the Prevention of Accidents’ (RoSPA) believes that 20mph represents the best compromise between mobility and risk.

Consultancy firm Atkins carried out an evaluation of Portsmouth City Council’s 20mph area wide scheme. Whilst there is an argument made by various people on whether the accidents/KSI actually went up or down following implementation, there is little argument over the fact that where average traffic speeds before the installation of 20 mph limits were above 24 mph, average speeds were significantly reduced, by around 7 mph. Early evidence also suggests that overall casualty benefits above the national trend were likely.

Going by the consultant’s finding and Croydon’s recently collected speed survey data whilst the vast majority of roads already fulfil the DfT guidelines regarding the 24mph limit for implementing a 20mph speed limit, it is also encouraging that where existing speeds are above the 24mph mark, we can anticipate the greatest drop in speed following the implementation of the maximum 20mph speed limit.

The argument that a 20mph speed limit causes more accidents or that the severity of accidents is increased with a drop in speed is not backed by research. I am unable to confirm your assertion that following the change in speed limit from 20mph to 30mph accidents went down in 1930. Even if true, there are likely to be factors which may not be well documented as to the true reasons. Certainly this would go against current research/studies which finds that accidents significantly drop in 20mph zones.

The DfT study into the effectiveness of 20mph schemes although due to be concluded in 2017 does not guarantee that the report will actually be finalised and made available by that time. Given the vast amount of studies already carried out and the acceptance that slower speeds help prevent severity of accidents it is appropriate that the Council proceeds to introduce the change in speed limit in line with other councils across London and the UK.

The speed survey data already collected across the North Croydon area shows that for the vast majority of roads, speeds are already low and where that is not the case speeds would arguably show a bigger drop in speeds which helps achieve the objectives set out by this scheme. The Metropolitan Police have previously said that enforcement action will be at the same level as what they are currently able to afford for the current speed limit. This simply means that the same resources which are used to enforce the current 30mph speed limit will be directed to enforce the new 20mph speed limit instead.

Officers believe that the 'opinion survey' was conducted in an open and fair way and officers do not believe that any fraudulent activities were part of the survey. Whilst your assertion is correct that the paper copies show a higher yes count in favour of the scheme this is understood to be down to the fact that ward councillors actively campaigned to get people involved in the process. The committee paper of March 2015 outlined that as part of the strategy to get more people to participate and voice their opinion a number of activities would be carried out amongst which, one was that ward councillors will actively reach out to their constituents.

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### **Objections 005-011**

Dear Croydon Council

I write to object to your proposal to impose a 20mph speed limit on all roads bar a few main roads across a large part of north Croydon in an area roughly bounded by the A23 London Road, the A213 Selhurst Road, and the A214 Beulah Hill.

- 1 - There is no need and no good or sufficient reason for imposing this blanket 20-mph restriction.
- 2 – A 20mph speed limit would increase journey times and impose economic costs in excess of any accident benefits.
- 3 – Most injury accidents occur on main roads, not where this speed limit is proposed.
- 4 - There are many better ways to spend money improving road safety.
- 5 – 20mph may be right for some roads, but not every road across north



Croydon.

6 - 20mph speed limits should only be put in roads where there is a real need and residents want them, so the blanket approach is wrong. Each road should be considered individually.

7 – On many of these roads, it is often normal and safe to drive around 25mph, so it would be wrong to force everyone to go no more than 20mph.

8 - Slowing traffic to 20mph means more vehicles on the road - it takes longer for each car, bus or lorry to get along a road.

9 - Slower traffic means worse fuel economy and worse air quality.

10 - Why should we pay higher council tax to provide extra buses and higher prices for goods in shops just for this 20mph scheme?

11 - Safety data shows more accidents in 20mph areas, and fewer in 30mph ones

12 – The police have better priorities than speed traps.

13 - Most pedestrian and cyclist injuries occur in busy streets and at slow speeds, not at speeds over 20mph.

14 – The council claim that reducing speeds gives more time to cross the road is simply not true

15 - This 20mph speed limit proposal is not based on a reasoned analysis of the best way to improve the road network. Instead spurious arguments such as tackling obesity have been dragged in.

16 – A 20mph speed limit is a restriction on personal liberty, and under the Human Rights Act it may only be imposed if it is shown to be objectively necessary.

There is no such need, and the council notice offers only an inadequate and false one.

**I object to this proposal, and say the council should drop this proposal and think again.**

### **Officer response**

The officer response is laid out in the same order as your objections

Your objection is partly based on the presumption that the council has not put forward a good enough reason for the introduction of a maximum 20mph speed limit for North-Croydon. I hope that my below response will help you understand the rationale behind the scheme which is primarily to increase road safety through a reduction in accidents and those that are killed or

seriously injured and also create a healthy environment for its residents by promoting sustainable modes of transport such as walking and cycling.

I hope the above summary, together with the contents of my below response will sufficiently help you understand the good reasons for initiating and putting forward the proposal to residents for their opinion. The proposal won support of the majority that responded to the 'opinion survey' and hence is being taken forward with the wishes of the residents of North-Croydon. To say the change is being imposed almost suggests that the council has not listened to the majority view and the scheme is being taken forward without support from the residents and businesses it impacts directly.

You raised the question of increased journey times and the negative effect it would have if the scheme is implemented. Journey time is dependent on a number of factors of which the maximum speed limit is an influencing factor. In general, side roads/residential roads are seen as a means of access to and from the main road network and therefore not designed to cater for large volumes of through-traffic. As you are aware, the council has not proposed to change the maximum speed limit to 20mph on the main road network which will continue to cater for through-traffic. If these facts are accepted, I am sure you will agree that the extra delay can only be attributed to a very small part of the typical journey. On average such a journey is likely to be less than 800 metres or ½ mile from ones home to the main road network and so the extra delay would hardly be noticeable. A vehicle driving at a constant 30mph compared to one which drives in exactly the same conditions but at 20mph would in theory be quicker by 26 seconds to cover 800 metres (½ mile). The actual experienced delay is likely to be even smaller for the further reasons given below.

Croydon council recently collected, 7 day speed survey data on various roads in the North Croydon area. Data was collected at 168 sites making a total of 327 directional surveys. The roads chosen for the speed survey were those for which the 20mph speed limit is proposed and were likely to have the highest travel speeds as they have no existing traffic calming along them. The data collected revealed that only 52 directions were found to have existing speed measurements above 24mph. From this speed survey sample, we can conclude that approximately 85% of the roads within the North-Croydon area already have slow vehicular speeds. Had existing traffic calmed roads also been included in the collection of the speed survey data, it is possible that this figure may have been as high as 95%. Given that existing speeds on the proposed 20mph network is already less than 30mph it would be reasonable to say, that actual delay experienced as a result of the 20mph proposal will be even smaller than the theoretical calculation above.

There are many influencing factors to be taken account of and there is no mathematical formula which can provide an accurate prediction of delays as traffic/road conditions vary all the time. In general, it is accepted that there could be some minor increase which will however be far outweighed by the road safety benefits. When comparing the same 2 cars and their braking distances, calculations show that if brakes are applied to both cars at the

same time, the car at 20mph will have become fully stationary whilst the car travelling at 30mph would still be moving at 22mph.

Your assertion that most accidents occur on main roads and yet the council maximum 20mph speed limit is not proposed for them is worthy of consideration. Main roads are designed to be strategic route thoroughfares and carry larger volumes of traffic; motor vehicles, cyclists and pedestrians. This naturally will lead to a larger number of conflicts. The main roads also play a different role in the hierarchy of road network; most fundamental of which is to ensure the expeditious movement of all traffic. Although a 20mph speed limit on main roads would undoubtedly go some way in reducing the number and severity of conflicts, it may also prove counterproductive, cause considerable delay as the major part of a typical journey is carried out along the main roads. This is not to say that accident remedial action should be omitted for the main roads but rather that this is achieved using different engineering solutions. Main roads have considerably greater road space and good sightlines compared to residential streets thereby allowing for more innovative and expensive measures to be put in place. Costly measures such as controlled pedestrian crossings or footway buildouts, enforcement cameras, signalised junctions etc are more justified on main roads where usage is likely to justify the costs.

A 30mph speed limit is generally considered appropriate for the main road network which is generally wider and has the necessary infrastructure/capacity to support the higher speed limit, whilst residential roads have many physical constraints which makes 20mph more suited for those roads.

Whilst you state that there are better ways to use available funding to improve road safety, you have identified none for the council to consider. I have however listed a few of the other activities which the council does and will continue with so as to improve road safety in as many ways as possible. These range from education, maintenance of roads, provision of new road signs, traffic calming, road realignments, junction improvements etc. All such measures complement each other and, work hand in hand. Any one measure without the other may not be effective in ensuring that the correct balance according to ever changing needs is maintained and improved upon. The current maximum 20mph proposal is also an important step forward which the council sees appropriate as do so many other councils across the UK. The council would welcome suggestions from the public on other means which may help to increase road safety further.

The council agrees with your viewpoint that not every road in the North-Croydon area is suitable for a lowering of the speed limit and hence the very reason that the full 'A' road network (with exception of Grange Road) is proposed to retain the existing 30mph speed limit.

Two of the issues you raised within your representation are addressed in this section. The issues in summary are that:

- a) on many of the roads it is often safe to drive at 25mph and so forcing drivers to travel at 20mph is not right. Cars, buses and lorries will also take longer to travel.
- b) each road should be considered individually and residents should support the change.

The proposal in general terms is to change the maximum speed limit to 20mph on residential roads but not main roads. Side/residential roads possess a number of constraints and dangers most obvious of which are narrow roads, dense parking, limited sightlines, few and far safe formal crossing points together with the likelihood of children playing or suddenly stepping out in between parked cars. Given the very nature of residential roads it is difficult to perceive that a bus or lorry operating on such a road can be considered driving between 25-30mph to be safe.

The current legal speed limit for many of the roads in the North-Croydon area is 30mph which is also the speed limit for the main 'A' road network and yet the difference between the two networks is significant. Whilst it may feel safe from the comfort of a car to drive at 25mph in a densely parked up and narrow residential street, this perception of safety is not felt in the same way by a pedestrian (especially children and the elderly) or a cyclist.

Child pedestrians in particular appear to be more vulnerable, as one study suggests that children do not perceive looming objects (such as an approaching vehicle) as an adult would. It was found that under most viewing conditions, children could not reliably detect a vehicle approaching at speeds greater than 25mph. As such the study concludes that lower vehicle speeds reduce the risk of severity and severity of child pedestrian casualties, not only because of lower impact speeds but also because there is a lower probability of a child stepping out in front of a vehicle in the first instance. The report referred to is 'Wann JP et al (2011) Reduced sensitivity to visual looming inflates the risk posed by speeding vehicles when children try to cross the road in Psychological Science, 22(4), pp429-434.

In the recent opinion survey which the council put forward to residents and businesses in the North Croydon area, 49.64% of respondents agreed whilst 34.89% disagreed that the council proposal would help to reduce road accidents and the severity of collisions that may still occur.

The same opinion survey also revealed that that 20.31% of respondents could take up walking and 21.45% would consider cycling following introduction of the new lower speed limit.

The council's speed survey data for North-Croydon shows that 85-95% of roads within North Croydon have average speeds of 24mph and less. This is significant in establishing that actually the majority of roads are suited to a 20mph.

Prior to the start of the 'opinion survey' with residents/businesses in May/June 2015, it was agreed by the council that the maximum 20mph proposal for

North-Croydon was proposed as a scheme for the whole area and would only be considered for implementation if the majority of respondents from within the North-Croydon area supported it. This was also communicated to the residents and businesses in the area through the literature produced for the scheme proposal such as the Frequently Asked Questions and newsletter which were made available online and as a paper copy.

Side roads connect to other side roads and more often than not, will have several junctions with other side roads. If half the roads voted for a change to 20mph whilst the other half voted to retain 30mph we could end up with a proliferation of large signs; littering every junction throughout the area. One section of road could be 20 whilst the next section is 30 and so on. This would not be considered a very wise engineering solution and the patchwork of 20/30 streets would cause confusion and accidents would certainly increase many fold.

Accident reduction is highly desirable for both the council and its residents however it is recognised that a change such as lowering of the speed limit over an area should be made with support from the residents. With some 34,000 households in the North-Croydon area, it was obvious that not all would agree to the change just as not all would disagree. Therefore it was made clear to residents from the outset that the scheme would only be proceeded with if the majority of respondents to the councils 'opinion survey' agreed.

The proposal was well publicised using a number of means which ranged from on-street notices in every road, press releases, use of social media, a dedicated webpage on the councils website and much more. A leaflet drop was also made to all properties in the area. Residents were made aware on the importance of their response and how this would be used in the decision making process. The results of the opinion survey showed that the majority of respondents supported the council proposal. The council has decided to proceed with the proposal because the residents have voted in favour of it.

The proposal is justified not only because the residents have supported it but also on safety grounds and the numerous ways how this could encourage residents to take up walking and cycling and the resulting benefits to society in general.

This section deals with the objection that slower speeds will result in worse fuel economy and worse air quality.

There are two broadly opposing views regarding the impact that slower speeds have on vehicle emissions and fuel use, suggesting the overall picture is inconclusive. It is believed that motor vehicles generally operate most efficiently at speeds higher than 20mph so decreasing vehicle speeds could result in higher emissions and fuel use. On the other hand, a lower speed limit in urban areas could possibly encourage smoother driving with reduced acceleration and braking, which would tend to reduce emissions and fuel use. In addition, it is possible that if there is mode shift towards sustainable modes,

emissions could be reduced even further.

The Centre for Transport Studies at Imperial College London found the following impact of lower speed limits on vehicle emissions for vehicles with an engine size of up to 2.0 litres.

- 1) Nitrogen Oxide emissions are higher for petrol vehicles at 20mph compared to 30mph whilst for diesel cars they are lower at 20mph compared to 30mph.
- 2) The Particulate Matter was lower for both petrol and diesel cars at 20mph when compared to 30mph for vehicles with engine size less than 2.0 litres.
- 3) Carbon dioxide emissions are higher for petrol vehicles at 20mph compared to 30mph whilst for diesel cars they are lower at 20mph compared to 30mph.

Whilst the study concluded that the effects on vehicle emissions are mixed, it does not account for potential associated impacts of speed restrictions, such as congestion or encouragements to shift mode to walking/cycling as a result of a more attractive environment for active travel.

With regard to driving styles, the same study observed that, across several routes in central London, a greater range of speeds occurred on 30 mph segments compared to 20mph segments. Average speed were higher on 30mph segments and, when restricted to speeds observed during cruising, were statistically significant. In addition, a large proportion of time was spent accelerating and decelerating on 30 mph segments suggesting that 20 mph routes may facilitate smooth driving.

The study identified the need for further research into emissions resulting from non- exhaust sources including brake and tyre wear.

This section deals with your disagreement to the fact that a lower speed gives people more time to cross the road. Unfortunately, no clarification on why this is disagreed with has been provided. I will however explain that the primary rationale for introducing 20mph speed limits is to improve road safety by reducing the number of collisions. Whilst the link between vehicle speed and road safety is generally well known and accepted, it is worth investigating why the risk of collisions and casualties tend to decrease as vehicle speeds decline. At a basic level, a lower speed means that drivers have more time to react to events that could potentially lead to a collision and so the likelihood of a collision being avoided in the first place and a lower impact speed for any collisions that do occur. This is likely to reduce injuries particularly for vulnerable road users such as pedestrians and cyclists. As explained earlier in my response, child pedestrians in particular appear to be more vulnerable, as one study suggests.

In considering the objection that there are more accidents in 20mph zones compared to 30mph, I have to disagree with your assertion for the following reasons. There is strong evidence that 20mph zones result in significant casualty reductions, although the available studies focus on zones with

physical traffic calming. A number of general studies have been undertaken that investigate and analyse the impacts of 20mph zones and limits, both in London and England. There are four main studies that are most relevant, and their key findings regarding accident reductions are summarised below.

- 1) Webster DC & Mackie AM (1996) Review of traffic calming schemes in 20mph zones (TRL Report 215) found;
  - a) *61% reduction in accidents and 70% reduction in killed or seriously injured (KSI) accidents (no adjustment for background trend).*
  - b) *63% reduction in pedestrian injury accidents, 29% reduction in pedal cyclist injury accidents, 73% reduction in motorcyclist injury accidents, 67% reduction in child (pedestrian and cyclist) injury accidents.*
  
- 2) Webster DC & Layfield RE (2003) Review of 20mph zones in London Boroughs (TRL Report PPR243) found;
  - a) *Adjusting for background changes, 45% reduction in casualties and 57% reduction in KSI casualties.*
  - b) *Adjusting for background changes, 45-60% reduction in child KSI casualties, 39-50% reduction in pedestrian KSI CASUALTIES, 30-50% in pedal cyclist KSI casualties and 68-79% reduction in powered two wheeler casualties.*
  
- 3) Grundy et al (2008a) 20mph zones and Road safety in London, London School of Hygiene and Tropical Medicine found;
  - a) *42% reduction in casualties in 20mph zones (taking into account background changes).*
  
- 4) Grundy et al (2008b) The effect of 20mph zones on inequalities in Road Casualties in London, London School of Hygiene and Tropical Medicine found;
  - a) *20mph zones historically targeted at high casualty, high deprivation areas, therefore helped to reduce inequality.*

The Metropolitan Police are responsible for enforcing all speed limits across London and the council has liaised with them regarding enforcement of the new speed limit. The Police have been clear in their position that their enforcement efforts of the proposed maximum 20mph speed limit for North-Croydon area will be at the same level as that used to enforce the existing 30mph/ or other speed limits in the borough. With regards to specific /targeted enforcement this is only likely to be at sites where there is a real and persistent problem. Any revenue generated through the collection of speeding fines is also passed to Central Government and neither the Police nor the council benefit directly from it. The cost benefit calculation provided in the FAQ's bases the benefits of the proposal purely on accident savings and the resultant benefit to society/individuals.

Whilst you consider the maximum 20mph speed limit a restriction on personal liberty, I beg to differ as the proposal objectively achieves more freedom to choice of travel as opposed to your claim. The proposal does not include road closures or banned movements which one may claim limits one's movements but reducing the speed limit from 30mph to 20mph promotes sustainable modes of travel such as walking and cycling. The equality impact assessment for this scheme has not highlighted that this poses a restriction

on one's persona liberty. This proposal is about achieving a good balance for all road users.

Finally I will explain that public health and traffic management are both duties which the local authority has a duty to take account of when considering it's policies.

The Traffic Management Act 2004 places a duty on highway authorities to secure the expeditious movement of traffic on their network. This is often wrongly perceived as motorised traffic only and used as an argument against 20mph schemes. However this narrow interpretation does not reflect the whole meaning of this requirement, as 'traffic' encompasses all modes of transport using roads, including pedestrians. The duty is essentially about balancing the needs of all road users, and also operates alongside other duties, including those in the area of road safety. This is made clear in the DfT's Network Management Duty Guidance.

Under the Health and Social Care Act 2012, local authorities took on a number of public health responsibilities in April 2013. This is of relevance, given the strong links between road safety and public health, which has been recognised by a number of local authorities.

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#### **Objection 012**

I am objecting to the 20 mph speed limit in the Norbury, Thornton Heath, Selhurst, Upper Norwood and South Norwood areas.

#### **Officer response**

Officers were unable to determine the reasons for the objection and so cannot provide a response.

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#### **Objection 013**

I am objecting to the 20 mph speed limit in the Norbury, Thornton Heath, Selhurst, Upper Norwood and South Norwood areas.

#### **Officer response**

Officers were unable to determine the reasons for the objection and so cannot provide a response.

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#### **Objection 014**

Dear Parking Design



I write to object to your proposal to impose a 20mph speed limit on all roads bar a few main roads across a large part of north Croydon in an area roughly bounded by the A23 London Road, the A213 Selhurst Road, and the A214 Beulah Hill.

Other than the usual rather over-used arguments for imposing road traffic restrictions on people (*ie improve road safety; discourage passing through traffic; encourage walking and cycling; improve the local environment*) there appears to be no good or sufficient reason for imposing this blanket 20mph restriction. If you are able to provide specific reasons and proper analysis (eg increase in accidents on the roads in question) I should be glad to hear them.

From what I have read, and I am sure you have read the following seem to be relevant:

A 20mph speed limit would increase journey times and impose economic costs in excess of any accident benefits.

Most injury accidents occur on main roads, not where this speed limit is proposed.

20mph may be right for some roads, but not every road across north Croydon.

20mph speed limits should only be put in roads where there is a real need and residents want them, so the blanket approach is wrong. Each road should be considered individually.

Slowing traffic to 20mph means more vehicles on the road - it takes longer for each car, bus or lorry to get along a road.

Slower traffic means worse fuel economy and worse air quality.

Safety data shows more accidents in 20mph areas, and fewer in 30mph ones. The police ought to have better priorities than speed tra

So unless you can demonstrate using cogent, reasoned arguments backed by proper analysis that this 20mph proposal holds real benefits for the people of Croydon, I strongly object to your imposing this. And suggesting you carried out "a survey" is really not a good argument at all (especially when the results look a tad suspect). After all if Parliament carried out a survey they would find most of us wanted to bring back hanging.

Please reconsider.

### **Officer response**

The reasons you have termed as 'over-used arguments' in your objection letter are considered valid reasons for the council proposal and should not be taken as spurious or lightly. I will explain this in more detail below.

I disagree with your assertion that a change would only be necessary if there is an increase in accidents. The challenge for all local authorities is to manage and reduce accidents wherever possible.

Research carried out by DfT showed that a one mph reduction in speed resulted in a 6% reduction in collisions. In 2013 the Mayor and Transport of London (TfL) published Safe Streets for London - an ambitious and comprehensive plan to make the roads safer for everyone who uses them. This includes a road safety target for London to reduce the number of people killed or seriously injured on London's roads by 40% by 2020, delivering a total reduction of 10,000 casualties by the end of the decade.

Recently, the Mayor and TfL published six commitments that are guiding initiatives to deliver this, and action is being taken to prioritise the safety of the most vulnerable road users - pedestrians, cyclists and motorcyclists - who account for 80% of those killed and seriously injured on the Capital's streets. The council's maximum 20mph proposal for North-Croydon is in line to help achieve the targets set by the Mayor of London.

You raised the question of increased journey times and the negative effect it would have if the scheme is implemented. Journey time is dependent on a number of factors of which the maximum speed limit is an influencing factor. In general, side roads/residential roads are seen as a means of access to and from the main road network and therefore not designed to cater for large volumes of through-traffic. As you are aware, the council has not proposed to change the maximum speed limit to 20mph on the main road network which will continue to cater for through-traffic. If these facts are accepted, I am sure you will agree that the extra delay can only be attributed to a very small part of the typical journey. On average such a journey is likely to be less than 800 metres or ½ mile from ones home to the main road network and so the extra delay would hardly be noticeable. A vehicle driving at a constant 30mph compared to one which drives in exactly the same conditions but at 20mph would in theory be quicker by 26 seconds to cover 800 metres (½ mile). The actual experienced delay is likely to be even smaller for the further reasons given below.

Croydon council recently collected, 7 day speed survey data on various roads in the North Croydon area. Data was collected at 168 sites making a total of 327 directional surveys. The roads chosen for the speed survey were those for which the 20mph speed limit is proposed and were likely to have the highest travel speeds as they have no existing traffic calming along them. The data collected revealed that only 52 directions were found to have existing speed measurements above 24mph. From this speed survey sample, we can conclude that approximately 85% of the roads within the North-Croydon area already have slow vehicular speeds. Had existing traffic calmed roads also been included in the collection of the speed survey data, it is possible that this figure may have been as high as 95%. Given that existing speeds on the proposed 20mph network is already less than 30mph it would be reasonable to say, that actual delay experienced as a result of the 20mph proposal will be even smaller than the theoretical calculation above.

There are many influencing factors to be taken account of and there is no mathematical formula which can provide an accurate prediction of delays as traffic/road conditions vary all the time. In general, it is accepted that there could be some minor increase which will however be far outweighed by the road safety benefits. When comparing the same 2 cars and their braking distances, calculations show that if brakes are applied to both cars at the same time, the car at 20mph will have become fully stationary whilst the car travelling at 30mph would still be moving at 22mph.

Your assertion that most accidents occur on main roads and yet the council maximum 20mph speed limit is not proposed for them is worthy of consideration. Main roads are designed to be strategic route thoroughfares and carry larger volumes of traffic; motor vehicles, cyclists and pedestrians. This naturally will lead to a larger number of conflicts. The main roads also play a different role in the hierarchy of road network; most fundamental of which is to ensure the expeditious movement of all traffic. Although a 20mph speed limit on main roads would undoubtedly go some way in reducing the number and severity of conflicts, it may also prove counterproductive, cause considerable delay as the major part of a typical journey is carried out along the main roads. This is not to say that accident remedial action should be omitted for the main roads but rather that this is achieved using different engineering solutions. Main roads have considerably greater road space and good sightlines compared to residential streets thereby allowing for more innovative and expensive measures to be put in place. Costly measures such as controlled pedestrian crossings or footway buildouts, enforcement cameras, signalised junctions etc are more justified on main roads where usage is likely to justify the costs.

A 30mph speed limit is generally considered appropriate for the main road network which is generally wider and has the necessary infrastructure/capacity to support the higher speed limit, whilst residential roads have many physical constraints which makes 20mph more suited for those roads.

The council agrees with your viewpoint that not every road in the North-Croydon area is suitable for a lowering of the speed limit and hence the very reason that the full 'A' road network (with exception of Grange Road) is proposed to retain the existing 30mph speed limit.

Prior to the start of the 'opinion survey' with residents/businesses in May/June 2015, it was agreed by the council that the maximum 20mph proposal for North-Croydon was proposed as a scheme for the whole area and would only be considered for implementation if the majority of respondents from within the North-Croydon area supported it. This was also communicated to the residents and businesses in the area through the literature produced for the scheme proposal such as the Frequently Asked Questions and newsletter which were made available online and as a paper copy.

Side roads connect to other side roads and more often than not, will have

several junctions with other side roads. If half the roads voted for a change to 20mph whilst the other half voted to retain 30mph we could end up with a proliferation of large signs; littering every junction throughout the area. One section of road could be 20 whilst the next section is 30 and so on. This would not be considered a very wise engineering solution and the patchwork of 20/30 streets would cause confusion and accidents would certainly increase many fold.

Accident reduction is highly desirable for both the council and its residents however it is recognised that a change such as lowering of the speed limit over an area should be made with support from the residents. It was also obvious that not all 34,000 households within the area would agree to the change just as all would not oppose it. Therefore it was made clear to residents from the outset that the scheme would only be proceeded with if the majority of respondents to the councils 'opinion survey' agreed.

The proposal was well publicised using a number of means which ranged from on-street notices in every road, press releases, use of social media, a dedicated webpage on the councils website and much more. A leaflet drop was also made to all properties in the area. Residents were made aware on the importance of their response and how this would be used in the decision making process. The results of the opinion survey showed that the majority of respondents supported the council proposal. The council has decided to proceed with the proposal because the residents have voted in favour of it.

The proposal is justified not only because the residents have supported it but also on safety grounds and the numerous ways how this could encourage residents to take up walking and cycling and the resulting benefits to society in general.

This section deals with the objection that slower speeds will result in worse fuel economy and worse air quality.

There are two broadly opposing views regarding the impact that slower speeds have on vehicle emissions and fuel use, suggesting the overall picture is inconclusive. It is believed that motor vehicles generally operate most efficiently at speeds higher than 20mph so decreasing vehicle speeds could result in higher emissions and fuel use. On the other hand, a lower speed limit in urban areas could possibly encourage smoother driving with reduced acceleration and braking, which would tend to reduce emissions and fuel use. In addition, it is possible that if there is mode shift towards sustainable modes, emissions could be reduced even further.

The Centre for Transport Studies at Imperial College London found the following impact of lower speed limits on vehicle emissions for vehicles with an engine size of up to 2.0 litres.

- 1) Nitrogen Oxide emissions are higher for petrol vehicles at 20mph compared to 30mph whilst for diesel cars they are lower at 20mph compared to 30mph.

- 2) The Particulate Matter was lower for both petrol and diesel cars at 20mph when compared to 30mph for vehicles with engine size less than 2.0 litres.
- 3) Carbon dioxide emissions are higher for petrol vehicles at 20mph compared to 30mph whilst for diesel cars they are lower at 20mph compared to 30mph.

Whilst the study concluded that the effects on vehicle emissions are mixed, it does not account for potential associated impacts of speed restrictions, such as congestion or encouragements to shift mode to walking/cycling as a result of a more attractive environment for active travel.

With regard to driving styles, the same study observed that, across several routes in central London, a greater range of speeds occurred on 30 mph segments compared to 20mph segments. Average speed were higher on 30mph segments and, when restricted to speeds observed during cruising, were statistically significant. In addition, a large proportion of time was spent accelerating and decelerating on 30 mph segments suggesting that 20 mph routes may facilitate smooth driving. The study identified the need for further research into emissions resulting from non- exhaust sources including brake and tyre wear.

In considering the objection that there are more accidents in 20mph zones compared to 30mph, I have to disagree with your assertion for the following reasons. There is strong evidence that 20mph zones result in significant casualty reductions, although the available studies focus on zones with physical traffic calming. A number of general studies have been undertaken that investigate and analyse the impacts of 20mph zones and limits, both in London and England. There are four main studies that are most relevant, and their key findings regarding accident reductions are summarised below.

- 1) Webster DC & Mackie AM (1996) Review of traffic calming schemes in 20mph zones (TRL Report 215) found;
  - a) *61% reduction in accidents and 70% reduction in killed or seriously injured (KSI) accidents (no adjustment for background trend).*
  - b) *63% reduction in pedestrian injury accidents, 29% reduction in pedal cyclist injury accidents, 73% reduction in motorcyclist injury accidents, 67% reduction in child (pedestrian and cyclist) injury accidents.*
- 2) Webster DC & Layfield RE (2003) Review of 20mph zones in London Boroughs (TRL Report PPR243) found;
  - a) *Adjusting for background changes, 45% reduction in casualties and 57% reduction in KSI casualties.*
  - b) *Adjusting for background changes, 45-60% reduction in child KSI casualties, 39-50% reduction in pedestrian KSI CASUALTIES, 30-50% in pedal cyclist KSI casualties and 68-79% reduction in powered two wheeler casualties.*
- 3) Grundy et al (2008a) 20mph zones and Road safety in London, London School of Hygiene and Tropical Medicine found;
  - a) *42% reduction in casualties in 20mph zones (taking into account background changes).*

- 4) Grundy et al (2008b) The effect of 20mph zones on inequalities in Road Casualties in London, London School of Hygiene and Tropical Medicine found;
  - a) *20mph zones historically targeted at high casualty, high deprivation areas, therefore helped to reduce inequality.*

The Metropolitan Police are responsible for enforcing all speed limits across London and the council has liaised with them regarding enforcement of the new speed limit. The Police have been clear in their position that their enforcement efforts of the proposed maximum 20mph speed limit for North-Croydon area will be at the same level as that used to enforce the existing 30mph/ or other speed limits in the borough. With regards to specific /targeted enforcement this is only likely to be at sites where there is a real and persistent problem. Any revenue generated through the collection of speeding fines is passed to Central Government and neither the Police or the council benefit directly from it. The cost benefit calculation provided in the FAQ's bases the benefits of the proposal purely on accident savings and the resultant benefit to society/individuals.

I trust you will find the above information useful in understanding why the council believes there exists a strong argument for this proposal.

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### **Objection 015**

To hum it may concern, i would like object to the introduction to 20mph driving in the streets .I live in a road that you into introduced this in to some years back and it does not work .you have even got traffic calming measures in place but they do not stop car from still driving in access of 30mph down the road.

I also believe that the first part of the consultation was unfaire , all that was put up was a couple of posters in the road that no one would take any notice of and a notice a local newspaper that not every one gets, this was evident in the results that was announced but yet when you want you can send out letters to every one when you want people to start paying for a service.ie garden waste

Also how much is this going to cost in council tax, you have already spent thousands on this so far just to now and will cost a lot more to implement it and that is in just one area, at a time when you are trying to save money by asking for redundantses

### **Officer response**

In publicising the proposal and in an effort to reach out to the residents and businesses in the North-Croydon area, the council placed over 2500 posters on lamp columns. Posters were also placed in the civic centre, local libraries and leisure centres in the area. Press releases were placed in the local

Guardian. The council sent out tweets and also sent out a reminder leaflet to all properties in the North-Croydon area. These activities are considered as sufficient to inform residents of the proposal.

This scheme is not funded directly from council tax revenue but rather from a Transport for London (TfL) grant which is available to all London Councils to carry out Road safety improvements.

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### **Objection 016**

I am totally against any 20 mph speed limit. It is anti social and Corbin socialist dogma only.

### **Officer response**

Officers were unable to determine the reasons for the objection and so cannot provide a response.

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### **Objection 017**

Dear Parking Design Team,

My normal typical speed through urban Croydon is 26mph. On certain roads, typically those without parked cars, of a more major type, such as Pampisford Road, I will drive 30mph, or 40mph on a few very open roads without or with few side turnings, like the Flyover. However, on many smaller residential roads, with parked cars lining both sides, I will drive at 20mph if it is unusually densely parked.

I have been doing a number of short, deliberate "test drives" locally in West Coudson, where I live, to see what driving at 20mph feels like, driving at 25mph feels like, and how driving at 30mph also feels.

My conclusion is that for the majority of roads, 20mph is artificially and painfully slow. It also feels frustratingly slow. Drivers behind are pressing.

I consider myself a reasonably patient driver who reads the road and traffic, and do not drive too close to other vehicles, for safety reasons and avoiding causing pressure to the driver in front.

Having considered the various speed options in real life, I consider that 20mph is to much too slow as a limit. I think it is unnecessary, and will have counter-productive results, in terms of reducing civilised, polite and respectful road behaviour, and increasing the levels of driver frustration, which is generally already present in London due to traffic volumes, and junction tail-backs.

I also think (based on around 40 years of driving) that the blanket imposition of a 20mph limit will lead to widespread driver disobedience. The Police will fail to enforce these low speed limits (I know, as I once asked a senior police Commander this question in a public forum. He told me clearly that the Police would not have time or resources to police this. Whilst finding this unacceptable in many ways, I feel that his words reflected reality. It has often been said that a Law that is flouted and despised by the reasonable member of the Public is unenforceable.

I would therefore like to object to a general imposition of a 20mph limit in N Croydon, or any other part of Croydon.

This is not to say that a 20mph limit is wrong for all roads. But I think these suitable roads should be identified, and marked as such.

In my view, the UK Government has got this wrong, and should consult about reducing from 30 to 25mph, which to me makes good sense. 30 to 20mph is too great a step.

I would ask the Council to seek approval from the UK Government to set a 25mph speed limit on side streets, retaining 30mph and 40 mph on main distributor roads.

Please take this email as my Objection to the 20mph Speed Limit as currently proposed. Thank you.

### **Officer response**

I have read your representation with much interest and find your test drive experience very interesting as it is quite similar to the data which Croydon has gathered from extensive speed survey data recently collected over a number of roads in North-Croydon. I shall explain this below.

Croydon council recently collected, 7 day speed survey data on various roads in the North Croydon area. Data was collected at 168 sites making a total of 327 directional surveys. The data was collected for a number of reasons such as to:

- 1) Establish the suitability of converting the roads in North-Croydon to a maximum 20mph speed limit.
- 2) Draw a comparison between existing speeds and those determined following the change in speed limit in the future.

Roads chosen for the speed surveys were those for which the 20mph speed limit is proposed and, were likely to reveal the highest travel speeds as they have no existing traffic calming along them. The data collected showed that only 52 of the 327 directions surveyed had existing average speed measurements above 24mph which is the Department of Transport (DfT) advised maximum when considering roads for a 20mph speed limit. From the speed survey sample, we can reasonably conclude that approximately 85% of



the roads within the North-Croydon area are already suited for implementing the maximum 20mph speed limit. Had existing traffic calmed roads also been included in the collection of the speed survey data, it is possible that this figure may have been as high as 95%.

Given that such a large part of the North-Croydon region is suited to a 20mph proposal, it would be irresponsible of Croydon to leave a small number of residential roads as 30mph to bear the burden. This would understandably be objectionable for residents within those roads for a variety of valid reasons.

The reason that drivers often see 20mph to be painfully slow is because driving at 20mph gives you a lot more time to register all the information that is surrounding you. What one registers is that they have an extra ability to cope with those events whilst we are driving. Because we have come to accept 30mph as our normal speed in built up areas then this has become our reference point. This is very similar to someone having driven for sometime on a motorway at 70 mph and then immediately on exiting the motorway driving at 40 mph. Because our body had become used to driving at 70mph it takes some time before it is able to adjust and accept that 40mph is not slow but appropriate for the surrounding environment.

The hierarchy of roads in a network play a significant role in determining the appropriate speed for it. A 30mph speed limit is generally considered appropriate for the main road network which is generally wider and has the necessary infrastructure/capacity to support the higher speed limit, whilst residential roads have many physical constraints which makes 20mph more suited for those roads.

I as a driver can understand your viewpoint that driving at 20mph may be frustrating for some especially the more agile however with the culture change which is taking place across London, it will only be a matter of time that 20mph for residential roads will become accepted by the vast majority.

I read with interest your comments regarding your discussion with a senior Police Commander regarding enforcement of a 20mph speed limit. The new 'Association of Chief Police Officers (ACPO) guidance on enforcement of 20mph speed limits recommends that in 20mph areas, drivers caught at speeds between 24-31mph should be offered the option of either attending a speed awareness course or receive a fixed penalty notice

The Metropolitan Police are responsible for enforcing all speed limits across London and the council has liaised with them regarding enforcement of the new speed limit. The Police have been clear in their position that their enforcement efforts of the proposed maximum 20mph speed limit for North-Croydon area will be at the same level as that used to enforce the existing 30mph/ or other speed limits in the borough. With regards to specific /targeted enforcement this is only likely to be at sites where there is a real and persistent problem.

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**Objection 018**

Dear Sir,

I am writing again to voice my objection to the 20mph speed limit in my area. As to my last phone call when this was first proposed it will increase air pollution. This I thought was meant to being reduced by this country and Europe? As I pointed out in my phone call a car travelling at 20mph in 2<sup>nd</sup> or 3<sup>rd</sup> gear will cause more air pollution than travelling at 30mph in 4<sup>th</sup> or 5<sup>th</sup> gears. This is over the same distance. It does not take much intelligence to work this out i.e. engine use to cover same distance.

The person I spoke to on the phone amazed me by saying this did not amount to the benefits. It is obvious he did not suffer with breathing problems or any of his family?

How is this limit going to be enforced? We are continually told that the police are under manned? (what a joke). So you are going to take them off from solving real crime to stop motorist going to fast. The person I spoke to on the phone about this said (Quote most motorist did not stick to 30mph now so it would make no difference).

As for making it safer for kids, cyclist, and elderly (me). The majority of speeding cars around here are parents running late to drop off or pick up children. It is a nightmare at these times to cross the road.

It will also not stop accidents as in over 40 years living here most accidents are caused by people not looking where their going. Pedestrians/kids on mobile phones. Cyclist not obeying the Highway code and car drivers pulling out without looking. A 20mph limit will not stop this.

**Officer response**

This section deals with the objection that slower speeds will result in worse fuel economy and worse air quality.

There are two broadly opposing views regarding the impact that slower speeds have on vehicle emissions and fuel use, suggesting the overall picture is inconclusive. It is believed that motor vehicles generally operate most efficiently at speeds higher than 20mph so decreasing vehicle speeds could result in higher emissions and fuel use. On the other hand, a lower speed limit in urban areas could possibly encourage smoother driving with reduced acceleration and braking, which would tend to reduce emissions and fuel use. In addition, it is possible that if there is mode shift towards sustainable modes, emissions could be reduced even further.

The Centre for Transport Studies at Imperial College London found the following impact of lower speed limits on vehicle emissions for vehicles with an engine size of up to 2.0 litres.

- 1) Nitrogen Oxide emissions are higher for petrol vehicles at 20mph compared to 30mph whilst for diesel cars they are lower at 20mph compared to 30mph.
- 2) The Particulate Matter was lower for both petrol and diesel cars at 20mph when compared to 30mph for vehicles with engine size less than 2.0 litres.
- 3) Carbon dioxide emissions are higher for petrol vehicles at 20mph compared to 30mph whilst for diesel cars they are lower at 20mph compared to 30mph.

Whilst the study concluded that the effects on vehicle emissions are mixed, it does not account for potential associated impacts of speed restrictions, such as congestion or encouragements to shift mode to walking/cycling as a result of a more attractive environment for active travel.

With regard to driving styles, the same study observed that, across several routes in central London, a greater range of speeds occurred on 30 mph segments compared to 20mph segments. Average speed were higher on 30mph segments and, when restricted to speeds observed during cruising, were statistically significant. In addition, a large proportion of time was spent accelerating and decelerating on 30 mph segments suggesting that 20 mph routes may facilitate smooth driving. The study identified the need for further research into emissions resulting from non- exhaust sources including brake and tyre wear.

The Metropolitan Police are responsible for enforcing all speed limits across London and the council has liaised with them regarding enforcement of the new speed limit. The Police have been clear in their position that their enforcement efforts of the proposed maximum 20mph speed limit for North-Croydon area will be at the same level as that used to enforce the existing 30mph/ or other speed limits in the borough. With regards to specific /targeted enforcement this is only likely to be at sites where there is a real and persistent problem. Any revenue generated through the collection of speeding fines is passed to Central Government and neither the Police or the council benefit directly from it.

Whilst I agree that a lot of accidents are caused for the reasons that you have stated in your letter, I will add that they are not likely to be different reasons to those causing accidents elsewhere and so, if 20mph speed limits have had a positive impact elsewhere then one can assume the same positive effects can be anticipated for North-Croydon.

There is strong evidence that 20mph zones result in significant casualty reductions, although the available studies focus on zones with physical traffic calming. A number of general studies have been undertaken that investigate and analyse the impacts of 20mph zones and limits, both in London and England. There are four main studies that are most relevant, and their key findings regarding accident reductions are summarised below.

- 1) Webster DC & Mackie AM (1996) Review of traffic calming schemes in 20mph zones (TRL Report 215) found;
    - a) *61% reduction in accidents and 70% reduction in killed or seriously injured (KSI) accidents (no adjustment for background trend).*
    - b) *63% reduction in pedestrian injury accidents, 29% reduction in pedal cyclist injury accidents, 73% reduction in motorcyclist injury accidents, 67% reduction in child (pedestrian and cyclist) injury accidents.*
  
  - 2) Webster DC & Layfield RE (2003) Review of 20mph zones in London Boroughs (TRL Report PPR243) found;
    - a) *Adjusting for background changes, 45% reduction in casualties and 57% reduction in KSI casualties.*
    - b) *Adjusting for background changes, 45-60% reduction in child KSI casualties, 39-50% reduction in pedestrian KSI CASUALTIES, 30-50% in pedal cyclist KSI casualties and 68-79% reduction in powered two wheeler casualties.*
  
  - 3) Grundy et al (2008a) 20mph zones and Road safety in London, London School of Hygiene and Tropical Medicine found;
    - a) *42% reduction in casualties in 20mph zones (taking into account background changes).*
  
  - 4) Grundy et al (2008b) The effect of 20mph zones on inequalities in Road Casualties in London, London School of Hygiene and Tropical Medicine found;
    - a) *20mph zones historically targeted at high casualty, high deprivation areas, therefore helped to reduce inequality.*
- 

### **Objection 019**

Dear Croydon Council,

I write to object to Croydon Council's proposal to impose a 20mph speed limit on all roads bar a few main roads across a large part of north Croydon in an area roughly bounded by the A23 London Road, the A213 Selhurst Road, and the A214 Beulah Hill.

This proposal is yet another drain on the council taxpayers of this borough, and in my opinion, not money well spent. The cost of erecting street signage (with lighting) and road markings etc. will not be a cheap exercise.

From my viewpoint the current speed limits of 30mph do not appear to be being enforced to any great extent. Apart from speed cameras (generally on major roads anyway), I have rarely (if ever) seen any police officers checking vehicle speeds on any major or side roads, although I do observe the (very frequent-can only be described as a token gesture) police vehicles drive past which I presume have speed checking facilities onboard. With this in mind, unless additional resources are put in place to properly enforce any proposed 20mph speed limits, the whole thing will just be a complete and utter expensive waste of time. To just suppose that putting up signs and road markings will immediately make everyone comply will sadly just not work. Far

better, cheaper and more sensible to fund resources to properly enforce the current 30mph speed limit,

**I object to the 20mph proposal and believe that Croydon Council should rethink alternative measures**

**Officer response**

This scheme is not funded directly from council tax revenue but rather from a Transport for London (TfL) grant which is available to all London Councils to carry out road safety improvements.

The cost for implementing the scheme in North-Croydon is estimated to be £300,000. The Department for Transport (DfT) estimated in 2010 the cost of an average collision to be £68,320. From this we can calculate that saving just 4.5 accidents would pay for the implementation of the scheme.

There are also significant financial savings (e.g. costs to the NHS) that will come with the health benefits if more people choose to walk or cycle. Air quality is also likely to improve if there are fewer people driving in these roads. This new approach of treating a large area for the 20mph will be more cost efficient than the previous programme of rolling out 20mph zone/limits in a small number of streets at a time due to economies of scale.

With regards to your concern over enforcement, I agree that this is key for a successful outcome but also believe that in the vast majority of instances the current speed limit is being reasonably adhered to. Croydon council recently collected, 7 day speed survey data on various roads in the North Croydon area. Data was collected at 168 sites making a total of 327 directional surveys. The roads chosen for the speed survey were those which currently have a maximum 30mph speed limit and which the council has included in the proposed 20mph network of roads. As the roads have no existing traffic calming, it was expected that average traffic speeds would be around 30mph, however from the collected data it was found that approximately 85% of the roads had average speeds of 24mph and less. From this I conclude that although the existing 30mph speed limit is generally being complied with, more can be done to reduce accidents and severity of injuries. The 20mph proposal is just one measure amongst others such as more education, road maintenance, junction improvements, etc. which will all help to reduce accidents.

Consultancy firm Atkins carried out an evaluation of Portsmouth City Council's 20mph area wide scheme. Whilst there is an argument made by various people on whether the accidents/KSI actually went up or down following implementation, there is little argument over the fact that where average traffic speeds before the installation of 20 mph limits were above 24 mph, average speeds were significantly reduced, by around 7 mph. Early evidence also suggested that overall casualty benefits above the national trend were likely.

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**Objection 020**

Dear Sirs,

I am writing in connection with the above proposals for the second time, following a request from the Alliance of British Drivers to repeat a protest I made earlier this year, but this time via E mail rather than petition.

There is no point in restating in detail the objections to the scheme, which have already been made so lucidly by the ABD. I will therefore only raise one issue.

Many people have observed that the current speed limit is not properly enforced. Consequently, there is little wisdom in reducing it still further. I myself, as I expect you also, have experience of the same policy already introduced in other London boroughs. I can assure you that, with the exception of Richmond Park, a rather special case, no driver takes the blindest bit of notice of the 20 mph limits – and that *includes* the police on routine duties, who are supposed to be enforcing the law.

May I suggest therefore that the Council abandons these plans, plans that are both foolish and vindictive, and instead concentrates its limited resources on proper maintenance of the highway system, which it most desperately needs, and is much more likely to reduce accidents.

**Officer response**

With regards to your concern over enforcement, I agree that this is key for a successful outcome but also believe that in the vast majority of instances the current speed limit is being reasonably adhered to. Croydon council recently collected, 7 day speed survey data on various roads in the North Croydon area. Data was collected at 168 sites making a total of 327 directional surveys. The roads chosen for the speed survey were those which currently have a maximum 30mph speed limit and which the council has included in the proposed 20mph network of roads. As the roads have no existing traffic calming, it was expected that average traffic speeds would be around 30mph, however from the collected data it was found that approximately 85% of the roads had average speeds of 24mph and less. From this I conclude that although the existing 30mph speed limit is generally being complied with, more can be done to reduce accidents and severity of injuries. The 20mph proposal is just one measure amongst others such as more education, road maintenance, junction improvements, etc. which will all help to reduce accidents.

Consultancy firm Atkins carried out an evaluation of Portsmouth City Council's 20mph area wide scheme. Whilst there is an argument made by various people on whether the accidents/KSI actually went up or down following implementation, there is little argument over the fact that where average traffic speeds before the installation of 20 mph limits were above 24 mph, average speeds were significantly reduced, by around 7 mph. Early evidence also

suggested that overall casualty benefits above the national trend were likely.

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### **Objection 021**

Dear Sirs,

I write to formally object to the proposals for a blanket 20mph speed limit in North Croydon. My grounds are as follows:

1) Claimed benefits will not materialise. For detailed evidence and reasons why please see a research report published by -----:`

[http://www.londonbusroutes.net/miscellaneous/Accident\\_trends.htm](http://www.londonbusroutes.net/miscellaneous/Accident_trends.htm)

Studies that claim to show improvements in accidents rates are deeply flawed, and the above paper explains these errors. I live in an area where 20mph zones were introduced some years ago, and the claimed "soft" benefits are simply fantasy.

2) Unnecessary restriction on freedom.

3) Waste of money: the sums of money are not insignificant: if money is available to spend on road safety there are much more effective ways of spending it. Whilst the council may not be paying the cost up-front, all taxpayers are ultimately paying for this.

4) Harm to travel, resulting from longer journey times - some of the roads concerned are important through routes and, indeed, bus routes. This will give rise to permanent increases in operating and wider economic costs, a fact which seems to have been ignored by the Council.

### **Officer response**

There is strong evidence that 20mph zones result in significant casualty reductions, although the available studies focus on zones with physical traffic calming. A number of general studies have been undertaken that investigate and analyse the impacts of 20mph zones and limits, both in London and England. There are four main studies that are most relevant, and their key findings regarding accident reductions are summarised below.

- 1) Webster DC & Mackie AM (1996) Review of traffic calming schemes in 20mph zones (TRL Report 215) found;
  - a) *61%reduction in accidents and 70% reduction in killed or seriously injured (KSI) accidents (no adjustment for background trend).*
  - b) *63% reduction in pedestrian injury accidents, 29% reduction in pedal cyclist injury accidents, 73% reduction in motorcyclist injury accidents, 67%reduction in child (pedestrian and cyclist) injury accidents.*

- 2) Webster DC & Layfield RE (2003) Review of 20mph zones in London Boroughs (TRL Report PPR243) found;
  - a) *Adjusting for background changes, 45% reduction in casualties and 57% reduction in KSI casualties.*
  - b) *Adjusting for background changes, 45-60% reduction in child KSI casualties, 39-50% reduction in pedestrian KSI CASUALTIES, 30-50% in pedal cyclist KSI casualties and 68-79% reduction in powered two wheeler casualties.*
  
- 3) Grundy et al (2008a) 20mph zones and Road safety in London, London School of Hygiene and Tropical Medicine found;
  - a) *42% reduction in casualties in 20mph zones (taking into account background changes).*
  
- 4) Grundy et al (2008b) The effect of 20mph zones on inequalities in Road Casualties in London, London School of Hygiene and Tropical Medicine found;
  - a) *20mph zones historically targeted at high casualty, high deprivation areas, therefore helped to reduce inequality.*

Whilst you consider the maximum 20mph speed limit a restriction on personal freedom, I beg to differ as the proposal objectively achieves more freedom to choice of travel as opposed to your claim. The proposal does not include road closures or banned movements which one may claim limits one's movements but reducing the speed limit from 30mph to 20mph promotes sustainable modes of travel such as walking and cycling. The equality impact assessment for this scheme has not highlighted that this poses a restriction on one's freedom of travel. This proposal is about achieving a good balance for all road users.

In the recent opinion survey which the council put forward to residents and businesses in the North Croydon area, 49.64% of respondents agreed whilst 34.89% disagreed that the council proposal would help to reduce road accidents and the severity of collisions that may still occur.

The same opinion survey also revealed that that 20.31% of respondents could take up walking and 21.45% would consider cycling following introduction of the new speed limit. Officers believe that the change brought about will lead to accident cost savings and a healthier lifestyle and so help achieve the council ambitions to make Croydon a sustainable, connected and caring city.

This scheme is not funded directly from council tax revenue but rather from a Transport for London (TfL) grant which is available to all London Councils to carry out road safety improvements. The cost for implementing the scheme in North-Croydon is estimated to be £300,000. The Department for Transport (DfT) estimated in 2010 the cost of an average collision to be £68,320. From this we can calculate that saving just 4.5 accidents would pay for the implementation of the scheme. There are also significant financial savings (e.g. costs to the NHS) that will come with the health benefits if more people choose to walk or cycle. Air quality is also likely to improve if there are fewer people driving in these roads. This new approach of treating a large area for the 20mph will be more cost efficient than the previous programme of rolling



out 20mph zone/limits in a small number of streets at a time due to economies of scale.

Whilst you state that there are better ways to use available funding to improve road safety, you have identified none for the council to consider. I have however listed a few of the other activities which the council does and will continue with so as to improve road safety in as many ways as possible. These range from education, maintenance of roads, provision of new road signs, traffic calming, road realignments, junction improvements etc. All such measures complement each other and, work hand in hand. Any one measure without the other may not be effective in ensuring that the correct balance according to ever changing needs is maintained and improved upon. The current maximum 20mph proposal is also an important step forward which the council sees appropriate as do so many other councils across the UK. The council would welcome suggestions from the public on other means which may help to increase road safety further.

You raised the question of increased journey times and the negative effect it would have if the scheme is implemented. Journey time is dependent on a number of factors of which the maximum speed limit is an influencing factor. In general, side roads/residential roads are seen as a means of access to and from the main road network and therefore not designed to cater for large volumes of through-traffic. As you are aware, the council has not proposed to change the maximum speed limit to 20mph on the main road network which is designed to cater for through traffic. Given these facts, I am sure you will agree that the extra delay can only be attributed to a very small part of the typical journey. On average such a journey is likely to be less than 800 metres or ½ mile from ones home to the main road network and so the extra delay would hardly be noticeable. A vehicle driving at a constant 30mph compared to one which drives in exactly the same conditions but at 20mph would in theory be quicker by 26 seconds to cover 800 metres (½ mile). The actual experienced delay is likely to be even smaller for the reasons given below.

Croydon council recently collected, 7 day speed survey data on various roads in the North Croydon area. Data was collected at 168 sites making a total of 327 directional surveys. The roads chosen for the speed survey were those for which the 20mph speed limit is proposed and were likely to have the highest travel speeds as they have no existing traffic calming along them. The data collected revealed that only 52 directions were found to have existing speed measurements above 24mph. From this speed survey sample, we can conclude that approximately 85% of the roads within the North-Croydon area already have slow vehicular speeds. Had existing traffic calmed roads also been included in the collection of the speed survey data, it is possible that this figure may have been as high as 95%. Given that existing speeds on the proposed 20mph network is already less than 30mph it would be reasonable to say, that actual delay experienced as a result of the 20mph proposal will be even smaller than the theoretical calculation above.

There are many influencing factors to be taken account of and there is no mathematical formula which can provide an accurate prediction of delays as

traffic/road conditions vary all the time. In general, it is accepted that there could be some minor increase which will however be far outweighed by the road safety benefits. When comparing the same 2 cars and their braking distances, calculations show that if brakes are applied to both cars at the same time, the car at 20mph will have become fully stationary whilst the car travelling at 30mph would still be moving at 22mph.

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### **Objection 022**

Regarding the above notice i like to register my opposition on the following grounds:

1// Driving at 20 mph will increase the pollution per mile driven

2// Will decrease the mpg hence making it more expensive for the average working class/pensioner.

3// most of the accidents are caused by irresponsible drivers who are likely to disregard the new limit as the disregard the existing 30 mph; leaving the low abiding citizen suffering the consequences of traveling at 22 mph.

4// i feel that the proposal will have no effect on decreasing accidents, and will only serve as a revenue generator for the council.

i will however support the reduction in speed around schools [ i already drive at that speed around schools now]

### **Officer response**

This section deals with the objection that slower speeds will result in worse fuel economy and worse air quality.

There are two broadly opposing views regarding the impact that slower speeds have on vehicle emissions and fuel use, suggesting the overall picture is inconclusive. It is believed that motor vehicles generally operate most efficiently at speeds higher than 20mph so decreasing vehicle speeds could result in higher emissions and fuel use. On the other hand, a lower speed limit in urban areas could possibly encourage smoother driving with reduced acceleration and braking, which would tend to reduce emissions and fuel use. In addition, it is possible that if there is mode shift towards sustainable modes, emissions could be reduced even further.

The Centre for Transport Studies at Imperial College London found the following impact of lower speed limits on vehicle emissions for vehicles with an engine size of up to 2.0 litres.

- 1) Nitrogen Oxide emissions are higher for petrol vehicles at 20mph compared to 30mph whilst for diesel cars they are lower at 20mph

- compared to 30mph.
- 2) The Particulate Matter was lower for both petrol and diesel cars at 20mph when compared to 30mph for vehicles with engine size less than 2.0 litres.
  - 3) Carbon dioxide emissions are higher for petrol vehicles at 20mph compared to 30mph whilst for diesel cars they are lower at 20mph compared to 30mph.

Whilst the study concluded that the effects on vehicle emissions are mixed, it does not account for potential associated impacts of speed restrictions, such as congestion or encouragements to shift mode to walking/cycling as a result of a more attractive environment for active travel.

With regard to driving styles, the same study observed that, across several routes in central London, a greater range of speeds occurred on 30 mph segments compared to 20mph segments. Average speed were higher on 30mph segments and, when restricted to speeds observed during cruising, were statistically significant. In addition, a large proportion of time was spent accelerating and decelerating on 30 mph segments suggesting that 20 mph routes may facilitate smooth driving. The study identified the need for further research into emissions resulting from non- exhaust sources including brake and tyre wear.

With regards to your concern over enforcement, I agree that this is key for a successful outcome but also believe that in the vast majority of instances the current speed limit is being reasonably adhered to. Croydon council recently collected, 7 day speed survey data on various roads in the North Croydon area. Data was collected at 168 sites making a total of 327 directional surveys. The roads chosen for the speed survey were those which currently have a maximum 30mph speed limit and which the council has included in the proposed 20mph network of roads. As the roads have no existing traffic calming, it was expected that average traffic speeds would be around 30mph, however from the collected data it was found that approximately 85% of the roads had average speeds of 24mph and less. From this I conclude that although the existing 30mph speed limit is generally being complied with, more can be done to reduce accidents and severity of injuries. The 20mph proposal is just one measure amongst others such as more education, road maintenance, junction improvements, etc. which will all help to reduce accidents.

Consultancy firm Atkins carried out an evaluation of Portsmouth City Council's 20mph area wide scheme. Whilst there is an argument made by various people on whether the accidents/KSI actually went up or down following implementation, there is little argument over the fact that where average traffic speeds before the installation of 20 mph limits were above 24 mph, average speeds were significantly reduced, by around 7 mph. Early evidence also suggests that overall casualty benefits above the national trend are likely.

Whilst you have expressed concern of being fined for (I assume unintentionally) travelling at 22mph in a 20mph limit area, I have no real life

example to relate to where in reality such a small violation may have been followed up by the law enforcement agencies. The new 'Association of Chief Police Officers (ACPO) guidance on enforcement of 20mph speed limits recommends that in 20mph areas, drivers caught at speeds between 24-31mph should be offered the option of either attending a speed awareness course or receive a fixed penalty notice.

There is strong evidence that 20mph zones result in significant casualty reductions, although the available studies focus on zones with physical traffic calming. A number of general studies have been undertaken that investigate and analyse the impacts of 20mph zones and limits, both in London and England. There are four main studies that are most relevant, and their key findings regarding accident reductions are summarised below.

- 1) Webster DC & Mackie AM (1996) Review of traffic calming schemes in 20mph zones (TRL Report 215) found;
  - a) *61% reduction in accidents and 70% reduction in killed or seriously injured (KSI) accidents (no adjustment for background trend).*
  - b) *63% reduction in pedestrian injury accidents, 29% reduction in pedal cyclist injury accidents, 73% reduction in motorcyclist injury accidents, 67% reduction in child (pedestrian and cyclist) injury accidents.*
  
- 2) Webster DC & Layfield RE (2003) Review of 20mph zones in London Boroughs (TRL Report PPR243) found;
  - a) *Adjusting for background changes, 45% reduction in casualties and 57% reduction in KSI casualties.*
  - b) *Adjusting for background changes, 45-60% reduction in child KSI casualties, 39-50% reduction in pedestrian KSI CASUALTIES, 30-50% in pedal cyclist KSI casualties and 68-79% reduction in powered two wheeler casualties.*
  
- 3) Grundy et al (2008a) 20mph zones and Road safety in London, London School of Hygiene and Tropical Medicine found;
  - a) *42% reduction in casualties in 20mph zones (taking into account background changes).*
  
- 4) Grundy et al (2008b) The effect of 20mph zones on inequalities in Road Casualties in London, London School of Hygiene and Tropical Medicine found;
  - a) *20mph zones historically targeted at high casualty, high deprivation areas, therefore helped to reduce inequality.*

Research carried out by DfT showed that a one mph reduction in speed resulted in a 6% reduction in collisions. In 2013 the Mayor and TfL published Safe Streets for London - an ambitious and comprehensive plan to make the roads safer for everyone who uses them. This includes a road safety target for London to reduce the number of people killed or seriously injured on London's roads by 40% by 2020, delivering a total reduction of 10,000 casualties by the end of the decade.

The Metropolitan Police are responsible for enforcing all speed limits across London and the council has liaised with them regarding enforcement of the new speed limit. The Police have been clear in their position that their

enforcement efforts of the proposed maximum 20mph speed limit for North-Croydon area will be at the same level as that used to enforce the existing 30mph/ or other speed limits in the borough. With regards to specific /targeted enforcement this is only likely to be at sites where there is a real and persistent problem. Any revenue generated through the collection of speeding fines is also passed to Central Government and neither the Police nor the council benefit directly from it.

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### **Objection 023**

Dear Croydon Council

I write on behalf of SENSE WITH ROADS write to object to your proposal to impose a 20mph speed limit on all roads bar a few main roads across a large part of north Croydon in an area roughly bounded by the A23 London Road, the A213 Selhurst Road, and the A214 Beulah Hill.

1 - There is no need and no good or sufficient reason for imposing this blanket 20-mph restriction.

2 – A 20mph speed limit would increase journey times and impose economic costs in excess of any accident benefits.

3 – Most injury accidents occur on main roads, not where this speed limit is proposed.

4 - There are many better ways to spend money improving road safety.

5 – 20mph may be right for some roads, but not every road across north Croydon.

6 - 20mph speed limits should only be put in roads where there is a real need and residents want them, so the blanket approach is wrong. Each road should be considered individually.

7 – On many of these roads, it is often normal and safe to drive around 25mph, so it would be wrong to force everyone to go no more than 20mph.

8 - Slowing traffic to 20mph means more vehicles on the road - it takes longer for each car, bus or lorry to get along a road.

9 - Slower traffic means worse fuel economy and worse air quality.

10 - Why should we pay higher council tax to provide extra buses and higher prices for goods in shops just for this 20mph scheme?

11 - Safety data shows more accidents in 20mph areas, and fewer in 30mph ones

12 – The police have better priorities than speed traps.

13 - Most pedestrian and cyclist injuries occur in busy streets and at slow speeds, not at speeds over 20mph.

14 – The council claim that reducing speeds gives more time to cross the road is simply not true

15 - This 20mph speed limit proposal is not based on a reasoned analysis of the best way to improve the road network. Instead spurious arguments such as tackling obesity have been dragged in.

16 – A 20mph speed limit is a restriction on personal liberty, and under the Human Rights Act it may only be imposed if it is shown to be objectively necessary. There is no such need, and the council notice offers only an inadequate and false one.

17 - The council informal "consultation" was rigged and the process abused, with hundreds of paper response forms handed out in the street only to those who supported the 20mph scheme.

18 - The formal consultation was not properly conducted, with no real opportunity for many even to know it was taking place.

19 - The council gave a misleading and wrong response to a FOI request. [https://www.whatdotheyknow.com/request/north\\_croydon\\_20mph\\_consultation](https://www.whatdotheyknow.com/request/north_croydon_20mph_consultation)

20 - The concept of an online only consultation, with no letter to individual properties, was a device designed to favour a YES to 20mph outcome, by ensuring that those supporting a YES outcome were unduly favoured, while those opposed were legally left in the dark

We object to this proposal, and say the council should drop this proposal and think again.

### **Officer response**

The officer response is laid out in the same order as your objections.

Your objection is partly based on the presumption that the council has not put forward a good enough reason for the introduction of a maximum 20mph speed limit for North-Croydon. I hope that my below response will help you understand the rationale behind the scheme which is primarily to increase road safety through a reduction in accidents and those that are killed or seriously injured and also create a healthy environment for its residents by

promoting sustainable modes of transport such as walking and cycling.

I hope the above summary, together with the contents of my below response will sufficiently help you understand the good reasons for initiating and putting forward the proposal to residents for their opinion. The proposal won support of the majority that responded to the 'opinion survey' and hence is being taken forward with the wishes of the residents of North-Croydon. To say the change is being imposed almost suggests that the council has not listened to the majority view and the scheme is being taken forward without support from the residents and businesses it impacts directly.

You raised the question of increased journey times and the negative effect it would have if the scheme is implemented. Journey time is dependent on a number of factors of which the maximum speed limit is an influencing factor. In general, side roads/residential roads are seen as a means of access to and from the main road network and therefore not designed to cater for large volumes of through-traffic. As you are aware, the council has not proposed to change the maximum speed limit to 20mph on the main road network which will continue to cater for through-traffic. If these facts are accepted, I am sure you will agree that the extra delay can only be attributed to a very small part of the typical journey. On average such a journey is likely to be less than 800 metres or ½ mile from ones home to the main road network and so the extra delay would hardly be noticeable. A vehicle driving at a constant 30mph compared to one which drives in exactly the same conditions but at 20mph would in theory be quicker by 26 seconds to cover 800 metres (½ mile). The actual experienced delay is likely to be even smaller for the further reasons given below.

Croydon council recently collected, 7 day speed survey data on various roads in the North Croydon area. Data was collected at 168 sites making a total of 327 directional surveys. The roads chosen for the speed survey were those for which the 20mph speed limit is proposed and were likely to have the highest travel speeds as they have no existing traffic calming along them. The data collected revealed that only 52 directions were found to have existing speed measurements above 24mph. From this speed survey sample, we can conclude that approximately 85% of the roads within the North-Croydon area already have slow vehicular speeds. Had existing traffic calmed roads also been included in the collection of the speed survey data, it is possible that this figure may have been as high as 95%. Given that existing speeds on the proposed 20mph network is already less than 30mph it would be reasonable to say, that actual delay experienced as a result of the 20mph proposal will be even smaller than the theoretical calculation above.

There are many influencing factors to be taken account of and there is no mathematical formula which can provide an accurate prediction of delays as traffic/road conditions vary all the time. In general, it is accepted that there could be some minor increase which will however be far outweighed by the road safety benefits. When comparing the same 2 cars and their braking distances, calculations show that if brakes are applied to both cars at the same time, the car at 20mph will have become fully stationary whilst the car

travelling at 30mph would still be moving at 22mph.

Your assertion that most accidents occur on main roads and yet the council maximum 20mph speed limit is not proposed for them is worthy of consideration. Main roads are designed to be strategic route thoroughfares and carry larger volumes of traffic; motor vehicles, cyclists and pedestrians. This naturally will lead to a larger number of conflicts. The main roads also play a different role in the hierarchy of road network; most fundamental of which is to ensure the expeditious movement of all traffic. Although a 20mph speed limit on main roads would undoubtedly go some way in reducing the number and severity of conflicts, it may also prove counterproductive, cause considerable delay as the major part of a typical journey is carried out along the main roads. This is not to say that accident remedial action should be omitted for the main roads but rather that this is achieved using different engineering solutions. Main roads have considerably greater road space and good sightlines compared to residential streets thereby allowing for more innovative and expensive measures to be put in place. Costly measures such as controlled pedestrian crossings or footway buildouts, enforcement cameras, signalised junctions etc are more justified on main roads where usage is likely to justify the costs.

A 30mph speed limit is generally considered appropriate for the main road network which is generally wider and has the necessary infrastructure/capacity to support the higher speed limit, whilst residential roads have many physical constraints which makes 20mph more suited for those roads.

Whilst you state that there are better ways to use available funding to improve road safety, you have identified none for the council to consider. I have however listed a few of the other activities which the council does and will continue with so as to improve road safety in as many ways as possible. These range from education, maintenance of roads, provision of new road signs, traffic calming, road realignments, junction improvements etc. All such measures complement each other and, work hand in hand. Any one measure without the other may not be effective in ensuring that the correct balance according to ever changing needs is maintained and improved upon. The current maximum 20mph proposal is also an important step forward which the council sees appropriate as do so many other councils across the UK. The council would welcome suggestions from the public on other means which may help to increase road safety further.

The council agrees with your viewpoint that not every road in the North-Croydon area is suitable for a lowering of the speed limit and hence the very reason that the full 'A' road network (with exception of Grange Road) is proposed to retain the existing 30mph speed limit.

Two of the issues you raised within your representation are addressed in this section. The issues in summary are that:

- a) on many of the roads it is often safe to drive at 25mph and so forcing



drivers to travel at 20mph is not right. Cars, buses and lorries will also take longer to travel.

- b) each road should be considered individually and residents should support the change.

The proposal in general terms is to change the maximum speed limit to 20mph on residential roads but not main roads. Side/residential roads possess a number of constraints and dangers most obvious of which are narrow roads, dense parking, limited sightlines, few and far safe formal crossing points together with the likelihood of children playing or suddenly stepping out in between parked cars. Given the very nature of residential roads it is difficult to perceive that a bus or lorry operating on such a road can be considered driving between 25-30mph to be safe.

The current legal speed limit for many of the roads in the North-Croydon area is 30mph which is also the speed limit for the main 'A' road network and yet the difference between the two networks is significant. Whilst it may feel safe from the comfort of a car to drive at 25mph in a densely parked up and narrow residential street, this perception of safety is not felt in the same way by a pedestrian (especially children and the elderly) or a cyclist.

Child pedestrians in particular appear to be more vulnerable, as one study suggests that children do not perceive looming objects (such as an approaching vehicle) as an adult would. It was found that under most viewing conditions, children could not reliably detect a vehicle approaching at speeds greater than 25mph. As such the study concludes that lower vehicle speeds reduce the risk of severity and severity of child pedestrian casualties, not only because of lower impact speeds but also because there is a lower probability of a child stepping out in front of a vehicle in the first instance. The report referred to is 'Wann JP et al (2011) Reduced sensitivity to visual looming inflates the risk posed by speeding vehicles when children try to cross the road in Psychological Science, 22(4), pp429-434.

In the recent opinion survey which the council put forward to residents and businesses in the North Croydon area, 49.64% of respondents agreed whilst 34.89% disagreed that the council proposal would help to reduce road accidents and the severity of collisions that may still occur.

The same opinion survey also revealed that that 20.31% of respondents could take up walking and 21.45% would consider cycling following introduction of the new lower speed limit.

The council's speed survey data for North-Croydon shows that 85-95% of roads within North Croydon have average speeds of 24mph and less. This is significant in establishing that actually the majority of roads are suited to a 20mph.

Prior to the start of the 'opinion survey' with residents/businesses in May/June 2015, it was agreed by the council that the maximum 20mph proposal for North-Croydon was proposed as a scheme for the whole area and would only

be considered for implementation if the majority of respondents from within the North-Croydon area supported it. This was also communicated to the residents and businesses in the area through the literature produced for the scheme proposal such as the Frequently Asked Questions and newsletter which were made available online and as a paper copy.

Side roads connect to other side roads and more often than not, will have several junctions with other side roads. If half the roads voted for a change to 20mph whilst the other half voted to retain 30mph we could end up with a proliferation of large signs; littering every junction throughout the area. One section of road could be 20 whilst the next section is 30 and so on. This would not be considered a very wise engineering solution and the patchwork of 20/30 streets would cause confusion and accidents would certainly increase many fold.

Accident reduction is highly desirable for both the council and its residents however it is recognised that a change such as lowering of the speed limit over an area should be made with support from the residents. With some 34,000 households in the North-Croydon area, it was obvious that not all would agree to the change just as not all would disagree. Therefore it was made clear to residents from the outset that the scheme would only be proceeded with if the majority of respondents to the councils 'opinion survey' agreed.

The proposal was well publicised using a number of means which ranged from on-street notices in every road, press releases, use of social media, a dedicated webpage on the councils website and much more. A leaflet drop was also made to all properties in the area. Residents were made aware on the importance of their response and how this would be used in the decision making process. The results of the opinion survey showed that the majority of respondents supported the council proposal. The council has decided to proceed with the proposal because the residents have voted in favour of it.

The proposal is justified not only because the residents have supported it but also on safety grounds and the numerous ways how this could encourage residents to take up walking and cycling and the resulting benefits to society in general.

This section deals with the objection that slower speeds will result in worse fuel economy and worse air quality.

There are two broadly opposing views regarding the impact that slower speeds have on vehicle emissions and fuel use, suggesting the overall picture is inconclusive. It is believed that motor vehicles generally operate most efficiently at speeds higher than 20mph so decreasing vehicle speeds could result in higher emissions and fuel use. On the other hand, a lower speed limit in urban areas could possibly encourage smoother driving with reduced acceleration and braking, which would tend to reduce emissions and fuel use. In addition, it is possible that if there is mode shift towards sustainable modes,

emissions could be reduced even further.

The Centre for Transport Studies at Imperial College London found the following impact of lower speed limits on vehicle emissions for vehicles with an engine size of up to 2.0 litres.

- 1) Nitrogen Oxide emissions are higher for petrol vehicles at 20mph compared to 30mph whilst for diesel cars they are lower at 20mph compared to 30mph.
- 2) The Particulate Matter was lower for both petrol and diesel cars at 20mph when compared to 30mph for vehicles with engine size less than 2.0 litres.
- 3) Carbon dioxide emissions are higher for petrol vehicles at 20mph compared to 30mph whilst for diesel cars they are lower at 20mph compared to 30mph.

Whilst the study concluded that the effects on vehicle emissions are mixed, it does not account for potential associated impacts of speed restrictions, such as congestion or encouragements to shift mode to walking/cycling as a result of a more attractive environment for active travel.

With regard to driving styles, the same study observed that, across several routes in central London, a greater range of speeds occurred on 30 mph segments compared to 20mph segments. Average speeds were higher on 30mph segments and, when restricted to speeds observed during cruising, were statistically significant. In addition, a large proportion of time was spent accelerating and decelerating on 30 mph segments suggesting that 20 mph routes may facilitate smooth driving.

The study identified the need for further research into emissions resulting from non- exhaust sources including brake and tyre wear.

This section deals with your disagreement to the fact that a lower speed gives people more time to cross the road. Unfortunately, no clarification on why this is disagreed with has been provided. I will however explain that the primary rationale for introducing 20mph speed limits is to improve road safety by reducing the number of collisions. Whilst the link between vehicle speed and road safety is generally well known and accepted, it is worth investigating why the risk of collisions and casualties tend to decrease as vehicle speeds decline. At a basic level, a lower speed means that drivers have more time to react to events that could potentially lead to a collision and so the likelihood of a collision being avoided in the first place and a lower impact speed for any collisions that do occur. This is likely to reduce injuries particularly for vulnerable road users such as pedestrians and cyclists. As explained earlier in my response, child pedestrians in particular appear to be more vulnerable, as one study suggests.

In considering the objection that there are more accidents in 20mph zones compared to 30mph, I have to disagree with your assertion for the following reasons. There is strong evidence that 20mph zones result in significant casualty reductions, although the available studies focus on zones with

physical traffic calming. A number of general studies have been undertaken that investigate and analyse the impacts of 20mph zones and limits, both in London and England. There are four main studies that are most relevant, and their key findings regarding accident reductions are summarised below.

- 1) Webster DC & Mackie AM (1996) Review of traffic calming schemes in 20mph zones (TRL Report 215) found;
  - a) *61% reduction in accidents and 70% reduction in killed or seriously injured (KSI) accidents (no adjustment for background trend).*
  - b) *63% reduction in pedestrian injury accidents, 29% reduction in pedal cyclist injury accidents, 73% reduction in motorcyclist injury accidents, 67% reduction in child (pedestrian and cyclist) injury accidents.*
  
- 2) Webster DC & Layfield RE (2003) Review of 20mph zones in London Boroughs (TRL Report PPR243) found;
  - a) *Adjusting for background changes, 45% reduction in casualties and 57% reduction in KSI casualties.*
  - b) *Adjusting for background changes, 45-60% reduction in child KSI casualties, 39-50% reduction in pedestrian KSI CASUALTIES, 30-50% in pedal cyclist KSI casualties and 68-79% reduction in powered two wheeler casualties.*
  
- 3) Grundy et al (2008a) 20mph zones and Road safety in London, London School of Hygiene and Tropical Medicine found;
  - a) *42% reduction in casualties in 20mph zones (taking into account background changes).*
  
- 4) Grundy et al (2008b) The effect of 20mph zones on inequalities in Road Casualties in London, London School of Hygiene and Tropical Medicine found;
  - a) *20mph zones historically targeted at high casualty, high deprivation areas, therefore helped to reduce inequality.*

The Metropolitan Police are responsible for enforcing all speed limits across London and the council has liaised with them regarding enforcement of the new speed limit. The Police have been clear in their position that their enforcement efforts of the proposed maximum 20mph speed limit for North-Croydon area will be at the same level as that used to enforce the existing 30mph/ or other speed limits in the borough. With regards to specific /targeted enforcement this is only likely to be at sites where there is a real and persistent problem. Any revenue generated through the collection of speeding fines is also passed to Central Government and neither the Police nor the council benefit directly from it. The cost benefit calculation provided in the FAQ's bases the benefits of the proposal purely on accident savings and the resultant benefit to society/individuals.

Whilst you consider the maximum 20mph speed limit a restriction on personal liberty, I beg to differ as the proposal objectively achieves more freedom to choice of travel as opposed to your claim. The proposal does not include road closures or banned movements which one may claim limits one's movements but reducing the speed limit from 30mph to 20mph promotes sustainable modes of travel such as walking and cycling. The equality impact assessment for this scheme has not highlighted that this poses a restriction

on one's persona liberty. This proposal is about achieving a good balance for all road users.

Finally I will explain that public health and traffic management are both duties which the local authority has a duty to take account of when considering it's policies.

The Traffic Management Act 2004 places a duty on highway authorities to secure the expeditious movement of traffic on their network. This is often wrongly perceived as motorised traffic only and used as an argument against 20mph schemes. However this narrow interpretation does not reflect the whole meaning of this requirement, as 'traffic' encompasses all modes of transport using roads, including pedestrians. The duty is essentially about balancing the needs of all road users, and also operates alongside other duties, including those in the area of road safety. This is made clear in the DfT's Network Management Duty Guidance.

Under the Health and Social Care Act 2012, local authorities took on a number of public health responsibilities in April 2013. This is of relevance, given the strong links between road safety and public health, which has been recognised by a number of local authorities.

In publicising the proposal and in an effort to reach out to all the residents and businesses in the North-Croydon area, the council placed over 2500 posters on lamp columns in every street within the area. Posters were also placed in the civic centre, local libraries and leisure centres within the area. Press releases were placed in the local Guardian. The council sent out tweets and also sent out a reminder leaflet to all properties in the North-Croydon area. Resident Associations were emailed encouraging them to get their members involved. Ward councillors actively campaigned to enlighten their constituents on the proposal. These activities are considered as sufficient to inform residents of the proposal.

I am unable to confirm your assertion that paper copies were handed out to only those that supported the scheme. As you will know, information on how paper copies could be requested directly from the council was placed in almost all the literature regarding the scheme. This ranged from the on-street notices through to information placed on the council website.

Your assertion that this was an on-line consultation only is unfounded as is your belief that an on-line only consultation would somehow benefit a 'Yes' vote. Moreover, it appears that you are unaware of the council leaflet drop made to all properties in the North-Croydon area regarding the scheme and therefore I do not believe that there should be any household in the area that was not made aware of the 'opinion survey'.

With regards to an FOI request which you have quoted, if you feel that the request was not properly performed, I believe you can request a review by contacting the council's FOI team.

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**Support 001**

Dear sir,

I would like to express my support for the above TMO.

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**Support 002**

Dear LB of Croydon,

Just a quick message to state that I am wholeheartedly in favour of the proposed 20 mph speed limit for Croydon North. I support this as a driver who likes to drive without stress and as a father whose daughters and wife walk to Cypress Primary school from our house on Auckland Road.

Please implement the proposal.

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**Support 003**

I strongly support the proposed TMO

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**Support 004**

I just want to write to express support for the traffic order to implement a 20mph speed limit in the proposed group of streets that are covered by the North Croydon area one consultation.

Evidence from the 20's Plenty campaign suggests that the combination of volumes of collisions and casualties that have occurred on the streets covered by this area, along with the high densities of people living in the area and the strong benefits to be derived from encouraging more people to walk and cycle and be active in their daily lives suggests very strongly a maximum speed for motor traffic of 20mph.

Implementation of the order will benefit pedestrians, cyclists AND motorists and the sooner the better!

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**Support 005**

To whom it may concern,

I refer to the abovementioned subject matter.

Please accept and record this email as my full support for the introduction of a 20mph area/zone in the north of Croydon for all the identified obvious reasons.

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**Support 006**

Dear Croydon Council,

I am writing to express my support for the traffic order relating to the implementation of a 20mph speed limit in the proposed group of streets that are covered by the North Croydon Area 1 consultation, ref PS/CH/Y86. I often take my nephew and niece for walks in the area, and would like to see the end of fast traffic there. I hope it is implemented.

---

**No Objection from Metropolitan Police**

Thank you for this data which allows me to formally comment on the proposals.

Firstly we support any scheme which will or has a likelihood to improve road safety and reduce casualties.

As a consequence I am not objecting to the scheme however I am raising a concern relating to the roads listed below.

I ask what engineering features are being considered to reduce the speeds along these roads.

Prior to listing these I would like to highlight some points.

1) I appreciate your accuracy with the speeds which to a degree work against you.

Most surveys only give the whole number and in the interests of fairness, round the speed down to this whole number.

Using your figures there were 85 directions above the DFT guidance out of 327 directions surveyed, giving 25.99% over 24mph.

Should you have rounded down there would have been 52 directions above DFT guidelines, giving 15.9% of roads above 24mph.

2) The directions I describe as 'marginal' represent a speed above 24mph and below 25mph (which could have rounded down), 'above' are speeds above 25mph.

When there are two directions and only one direction is shown as 'Marginal' the other direction will be above 25mph.

Ryecroft Road	N + S	Marginal	Site 2
Biggin Hill	S	Marginal	Site 4
Christian Fields	S	Marginal	Site 6
Gibsons Hill	N + S	Marginal	Site 7
Croft Road	S	Marginal	Site 12
Spurgeon Road	N + S	Marginal	Site 19
Harold Road	N + S,	S is Marginal	Site 20
Rockmount Road	N	Marginal	Site 22
Ryefield Road	E + W,	E is Marginal	Site 26
Bradley Road	N + S,	N is Marginal	Site 28
Moore Road	N + S	Marginal	Site 29
Granville Road	S	Above	Site 33
Norbury Avenue	N + S	Marginal	Site 34
Norbury Crescent	N + S	Marginal	Site 35
Norbury Avenue	N + S,	S is Marginal	Site 36
Norbury Crescent	N + S	Above	Site 37
Norbury Avenue	N + S,	S is Marginal	Site 38
Melfort Road	N + S	Above	Site 39
Norbury Avenue	N + S	Marginal	Site 43
Beulah Road	S	Above	Site 44
Melfort Road	N + S	Above	Site 45



Representations	APPENDIX A		
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Melfort Road	N + S	Above	Site 47
Warwick Road	N + S	Above	Site 58
Ederline Avenue	N	Marginal	Site 60
Elm Road	E	Marginal	Site 76
Bensham Lane	N + S	Above	Site 83
Mayday Road	N	Marginal	Site 86
Campbell Road	S	Marginal	Site 87
Lodge Road	N + S	S is Marginal	Site 89
Lodge Road	S	Marginal	Site 93
St Saviours Road	S	Marginal	Site 94
Windmill Road	N + S	Above	Site 95
Dagnall Park	S	Marginal	Site 99
Pembrook Road	S	Marginal	Site 104
Holmesdale Road	N + S	Above	Site 105
Bungalow Road	S	Above	Site 107
Park Road	N + S	Above	Site 108
Holmesdale Road	N + S	Above	Site 111
Oliver Grove	N + S	S is Marginal	Site 113
Holmesdale Road	N + S	Above	Site 114
Woodvale Avenue	N	Above	Site 121
Lancaster Road	S	Above	Site 123
Grange Road	N + S	Above	Site 129
Grange Road	N + S	Above	Site 130
Grange Road	N + S	Above	Site 131
Howberry Road	N	Marginal	Site 134

Representations	APPENDIX A		
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Grange Road	N + S	Above	Site 140
Livingstone Road	SW	Above	Site 143
Grange Road	S	Above	Site 159
Ladbrook Road	N	Above	Site 161
Grange Road	N + S	Above	Site 162
Grange Road	N + S	Above	Site 163
Ross Road	N + S	Above	Site 164

### **Officer response**

Thank you for the detailed analysis and comments. Croydon welcomes your support of the proposal which is key to making this a successful project.

If following the statutory consultation the scheme gets the go-ahead, following implementation we intend to repeat the speed surveys for the same sites. The data will serve to both compare the actual change in speeds and also identify whether further targeted intervention would be beneficial at particular locations. The re-measurement of speeds will be carried out once the scheme has had time to settle which in my estimate would be between 6-12 months after implementation.

As the current posted speed limit is 30mph, I expected average speeds or the 85<sup>th</sup> percentile to be around the 30mph mark, however it is very encouraging to see that most of the locations are actually showing lower than this. I'd like to think that once the speed limit is changed to 20mph, the average speeds/85<sup>th</sup> percentile would also drop accordingly for some of the 52 directions which you have identified. I believe that there is merit in making the change in speed limit and then monitor the situation before considering expensive interventions such as targeted enforcement or traffic calming. So for the moment, we will continue to use education as the means to ensure that general compliance will follow. Of course Croydon will also continue its programme of putting up speed visors or the use of ANPR equipment etc. at problematic sites.

I note that of the 52 directions, 13 of them are actually on Grange Road which has been an accident hotspot for many years. More recently Croydon has installed a speed table and made use of speed visors both of which have helped to educate and reduce speeds. More needs to be done for this road and I believe that posting a lower speed limit is only another step in the right direction and in future more will be needed. I have asked Grange Road to be also considered for an ANPR under the council's program of work.

I hope you find this an acceptable and rational approach. Do not hesitate to contact me if you need to discuss any of the issues further.



CROYDON COUNCIL  
TRAFFIC MANAGEMENT ORDER  
20- No.Y86

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The Croydon (20MPH Speed Limit) (No.B86) Traffic Order 20-

Made: 20-

Coming into operation: 20-

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Croydon Council after consulting the Commissioner of Police of the Metropolis, in exercise of the powers conferred by Sections 84, 87 and 124 of and Part IV of Schedule 9 to the Road Traffic Regulation Act, 1984(a) as amended and of all other powers thereunto enabling hereby make the following Order:-

1. This Order shall come into operation on the 20- and may be cited as the Croydon (20MPH Speed Limit) (No.B86) Traffic Order 20-.
2. In this Order, the expression 'enactment' means any enactment, whether public, general or local, and includes any order, byelaw, rule, regulation, scheme or other instrument having effect by virtue of an enactment and 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. The prohibitions imposed by this Order are in addition to and not in derogation of any restriction, prohibition or requirement imposed by any other enactment and any expression or exemption from the provisions of this Order is without prejudice to the provisions of any other enactment.
4. Without prejudice to the validity of anything done or to any liability incurred in respect of any act or omission before the coming into operation of this Order:-
  - (a) No person shall drive any motor vehicle in any street or length of street within the area specified in Schedule 1 to this Order at a speed exceeding 20 miles per hour;

(b) Nothing in this Order shall apply to:

- (i) the roads bounding but not included in the area, as specified in Schedule 1 to this Order;
- (ii) those roads within the boundary specified in Schedule 2 to this Order;
- (iii) private roads;
- (iv) those roads within the boundary of the new area to which an existing 20mph speed limit applies.

Dated this            20-

Mike Barton  
Highway Improvement Manager  
Place Department

## SCHEDULE 1

## 20mph speed limit area

Crown Lane (between the borough boundary and Crown Dale), Crown Dale, Central Hill, Westow Hill, Church Road (between Westow Hill and Lansdowne Place), Lansdowne Place, Fox Hill (between Lansdowne Place and borough boundary), borough boundary (between Fox Hill and Penge Road), Penge Road (between the borough boundary and Goat House Bridge), Goat House Bridge, High Street South Norwood, Selhurst Road, Northcote Road, Whitehorse Road (between Northcote Road and St James's Road), St James's Road (between Whitehorse Road and London Road), London Road (between St James's Road and Hermitage Lane), borough boundary (between Hermitage Lane and Crown Lane).

## SCHEDULE 2

## Excluded roads within the 20mph speed limit area boundary

Reynard Drive	Parchmore Road
Beulah Hill	South Norwood Hill
Brigstock Road	Westow Street
Church Road	Whitehorse Lane
Green Lane	Whitehorse Road
High Street Thornton Heath	Windmill Road
Hogarth Crescent	<b>All roads/sections of road with an existing 20mph speed limit</b>
Fox Hill Gardens	<b>All private roads</b>

## STATEMENT OF REASONS

The Order is intended to introduce speed limits of 20mph in various roads within the London Borough of Croydon. The 20mph speed limit is intended to increase road safety. Reducing traffic speeds provides more time for pedestrians to cross the road which should particularly benefit children, the elderly and those with mobility problems.

**CROYDON COUNCIL****PROPOSED 20MPH SPEED LIMIT NORTH-CROYDON (AREA 1)****The Croydon (20mph Speed Limit) (No.Y86) Traffic Order 20-**

1. NOTICE IS HEREBY GIVEN that Croydon Council propose to make the above Order under Sections 84, 87 and 124 of and Part IV of Schedule 9 to the Road Traffic Regulation Act, 1984 as amended and all other enabling powers.
2. **The general effect of the Order would be to prohibit any motor vehicle exceeding a speed of 20 miles per hour in the area described in Schedule 1 to this Notice, excluding the roads bounding the area (as specified) and those roads within the boundary listed in Schedule 2 to this Notice. Roads within the boundary of the new area to which an existing 20mph speed limit applies will continue to retain their speed limits under their respective Orders.**
3. A copy of the proposed Order and of all related Orders, of the Council's statement of reasons for proposing to make the Order and of the plans which indicate each length of road to which the Order relates, can be inspected from 9am to 4pm on Mondays to Fridays inclusive until the last day of a period of six weeks beginning with the date on which the Order is made or, as the case may be, the Council decides not to make the Order, at the Enquiry Counter, 'Access Croydon' Facility, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA.
4. Further information may be obtained by telephoning the Streets Division, Highways Team, Place Department, telephone number 020 8726 6000 extension 52831.
5. Persons desiring to object to the proposed Order should send a statement in writing of their objection and the grounds thereof to the **Order Making Section, Parking Design Team, Place Department, Croydon Council, Floor 6 Zone C, Bernard Weatherill House, 8 Mint Walk, Croydon CR0 1EA** or by emailing **parking.design@croydon.gov.uk** quoting the reference **PS/CH/Y86** by **24<sup>th</sup> December 2015**.
6. The Order is intended to introduce a 20mph speed limit in in the area of the London Borough of Croydon specified in the Schedule to this notice. Reducing traffic speeds provides more time for pedestrians to cross the road which should particularly benefit children, the elderly and those with mobility problems. For further details on the proposal please visit **[www.croydon.gov.uk/20mph](http://www.croydon.gov.uk/20mph)**

Dated 25 November 2015

Mike Barton  
Highway Improvement Manager  
Place Department

**SCHEDULE 1 – 20mph speed limit area**

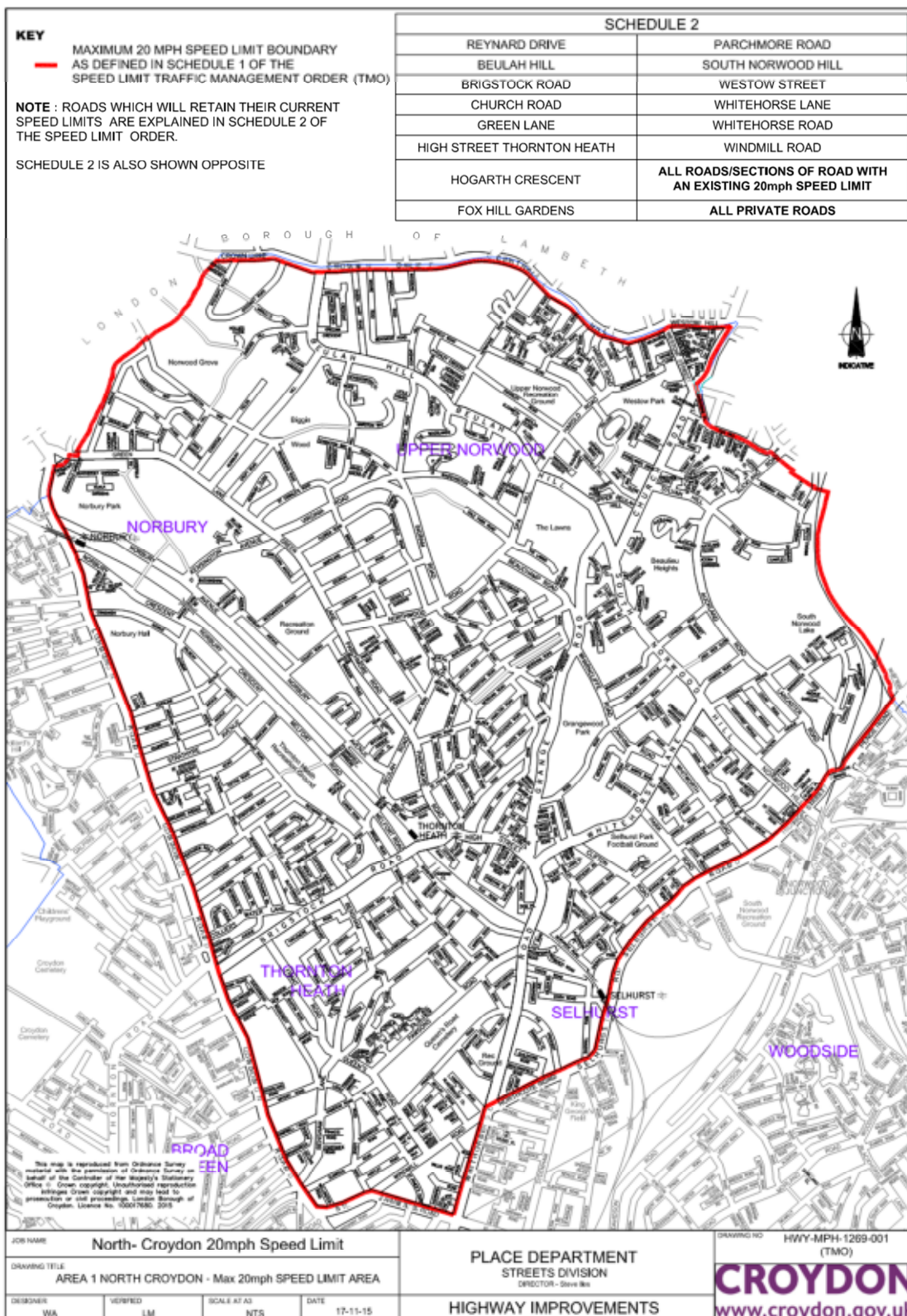
Streets within the area bounded by but **not** including:

Crown Lane (between the borough boundary and Crown Dale), Crown Dale, Central Hill, Westow Hill, Church Road (between Westow Hill and Lansdowne Place), Lansdowne Place, Fox Hill (between Lansdowne Place and borough boundary), borough boundary (between Fox Hill and Penge Road), Penge Road (between the borough boundary and Goat House Bridge), Goat House Bridge, High Street South Norwood, Selhurst Road, Northcote Road, Whitehorse Road (between Northcote Road and St James's Road), St James's Road (between Whitehorse Road and London Road), London Road (between St James's Road and Hermitage Lane), borough boundary (between Hermitage Lane and Crown Lane).

**SCHEDULE 2 – excluded roads within the 20mph speed limit area boundary**

Reynard Drive	Parchmore Road
Beulah Hill	South Norwood Hill
Brigstock Road	Westow Street
Church Road	Whitehorse Lane
Green Lane	Whitehorse Road
High Street Thornton Heath	Windmill Road
Hogarth Crescent	<b>All roads/sections of road with an existing 20mph speed limit</b>
Fox Hill Gardens	<b>All private roads</b>





# PUBLIC NOTICE

**CROYDON COUNCIL**  
**PROPOSED 20MPH SPEED LIMIT NORTH-CROYDON (AREA 1)**  
**The Croydon (20mph Speed Limit) (No.Y86) Traffic Order 20-**

1. NOTICE IS HEREBY GIVEN that Croydon Council propose to make the above Order under Sections 84, 87 and 124 of and Part IV of Schedule 9 to the Road Traffic Regulation Act, 1984 as amended and all other enabling powers.
2. The general effect of the Order would be to prohibit any motor vehicle exceeding a speed of 20 miles per hour in the area described in Schedule 1 to this Notice, excluding the roads bounding the area (as specified) and those roads within the boundary listed in Schedule 2 to this Notice. Roads within the boundary of the new area to which an existing 20mph speed limit applies will continue to retain their speed limits under their respective Orders.
3. A copy of the proposed Order and of all related Orders, of the Council's statement of reasons for proposing to make the Order and of the plans which indicate each length of road to which the Order relates, can be inspected from 9am to 4pm on Mondays to Fridays inclusive until the last day of a period of six weeks beginning with the date on which the Order is made or, as the case may be, the Council decides not to make the Order, at the Enquiry Counter, 'Access Croydon' Facility, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA.
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5. Persons desiring to object to the proposed Order should send a statement in writing of their objection and the grounds thereof to the Order Making Section, Parking Design Team, Place Department, Croydon Council, Floor 6 Zone C, Bernard Weatherill House, 8 Mint Walk, Croydon CR0 1EA or by emailing [parking.design@croydon.gov.uk](mailto:parking.design@croydon.gov.uk) quoting the reference PS/CH/Y86 by 24<sup>th</sup> December 2015.
6. The Order is intended to introduce a 20mph speed limit in in the area of the London Borough of Croydon specified in the Schedule to this notice. Reducing traffic speeds provides more time for pedestrians to cross the road which should particularly benefit children, the elderly and those with mobility problems. For further details on the proposal please visit [www.croydon.gov.uk/20mph](http://www.croydon.gov.uk/20mph)

*Dated 25 November 2015*

*Mike Barton, Highway Improvement Manager, Place Department*

**SCHEDULE 1 – 20mph speed limit area**

Streets within the area bounded by but **not** including:

Crown Lane (between the borough boundary and Crown Dale), Crown Dale, Central Hill, Westow Hill, Church Road (between Westow Hill and Lansdowne Place), Lansdowne Place, Fox Hill (between Lansdowne Place and borough boundary), borough boundary (between Fox Hill and Penge Road), Penge Road (between the borough boundary and Goat House Bridge), Goat House Bridge, High Street South Norwood, Selhurst Road, Northcote Road, Whitehorse Road (between Northcote Road and St James's Road), St James's Road (between Whitehorse Road and London Road), London Road (between St James's Road and Green Lane), borough boundary (between Green Lane and Crown Lane).

**SCHEDULE 2 – excluded roads within the 20mph speed limit area boundary**

Reynard Drive	Parchmore Road
Beulah Hill	South Norwood Hill
Brigstock Road	Westow Street
Church Road	Whitehorse Lane
Green Lane	Whitehorse Road
High Street Thornton Heath	Windmill Road
Hogarth Crescent	<b>All roads/sections of road with an existing 20mph speed limit</b>
Fox Hill Gardens	<b>All private roads</b>