

For General Release

REPORT TO:	Traffic Management Advisory Committee 9 May 2017
AGENDA ITEM:	7
SUBJECT:	Croydon Area-Wide 20mph Speed Limits – Areas 3, 4 & 5 Statutory Consultation - Report on objections
LEAD OFFICER:	Shifa Mustafa Executive Director – Place Steve Iles – Director of Streets
CABINET MEMBER:	Councillor Stuart King Cabinet Member for Transport and Environment
WARDS:	Broad Green, Coulsdon East, Coulsdon West, Croham, Fairfield, Fieldway, Heathfield, Kenley, New Addington, Norbury, Purley, Sanderstead, Selsdon & Ballards, Shirley, Waddon, West Thornton
<p>CORPORATE PRIORITY/POLICY CONTEXT:</p> <p>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:</p> <ul style="list-style-type: none"> • Implement the 20-year Transport Vision to improve safety and access for all road users, particularly pedestrians, cyclists and people travelling by public transport. • Implement an area-wide 20mph maximum speed limit scheme across Croydon, on an area by area basis, subject to public consultation in each area. 	
<p>AMBITIOUS FOR CROYDON & WHY ARE WE DOING THIS:</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"> • Introducing 20mph speed limits to all roads except major through routes and those where there are proven reasons for them being impracticable. • Improve safety for cyclists and pedestrians. Ensure that these policy initiatives are embedded within the developing Transport Vision. 	

FINANCIAL IMPACT:

The cost of implementing an area-wide 20mph speed limit across North-West Croydon, South-East Croydon and South-West Croydon referred to as areas 3, 4 & 5 respectively, is estimated to be £592,500. The cost of this proposal if approved is to be met from the £600,000 Transport for London (TfL) allocation secured through the Local Implementation Plan (LIP) for 2017/2018 and 2018/19.

KEY DECISION REFERENCE:

08.17.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 statutory (formal) consultation and the officer comments in response to the objections within this report and agree, that the Highway Improvements Manager, Streets Division, be authorised to make the necessary Traffic Management Orders under the Road Traffic Regulation Act 1984 (as amended) so as to
 - a) Implement the maximum 20mph speed limit for North-West Croydon Area 3 as identified on plan HWY-MPH-0000-005.
 - b) Implement the maximum 20mph speed limit for South-East Croydon Area 4 as identified on plan HWY-MPH-0000-006.
 - c) Implement the maximum 20mph speed limit for South-West Croydon Area 5 as identified on plan HWY-MPH-0000-007.
- 1.2 Consider the representations received concerning other roads to be included or excluded from the 20mph speed limits in Areas 3, 4 & 5 and authorise the Highway Improvements Manager, Streets Division, to issue any notice required and make any necessary Traffic Management Orders under the Road Traffic Regulation Act 1984 (as amended) after determination of any objections received.
- 1.3 Officers to inform the objectors and those who responded in support of the decision

2. EXECUTIVE SUMMARY

- 2.1 This report details the objections received in response to the statutory (formal) consultation for the introduction of a maximum 20mph speed limit for the Croydon Areas 3, 4 & 5 which are shown in the plans HWY-MPH-0000-005, 006 & 007 in Annex 1. Roads within each area which are to retain their existing

maximum speed limit are also listed on the same plans and in the Public Notices attached in Annex 2.

- 2.2 A list of roads suggested by respondents to be added to the 20mph limits in each area is included in this report. A list of roads suggested by respondents to remain at 30mph in each area is also included in this report. These lists are in Annex 3.
- 2.3 All objections received in response to the Public Notice for the Croydon Areas 3, 4 & 5 20mph limits scheme together with an officer response to each objection is in Section 5 of 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'. Members on this sub-committee represented views both in support and in opposition to the 20mph proposal.

The report can be accessed at

<https://secure.croydon.gov.uk/akscroydon/users/public/admin/kab14.pl?operation=SUBMIT&meet=2&cmte=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, Alliance of British Drivers. Organisations who submitted information for the sub-committee to consider represented those who supported and opposed 20mph speed limits.

- 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 and how implementation was to happen. The group was 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. It was decided at that meeting that the procedure to be followed for the areas covering the borough of Croydon was as outlined below:

- Seek public opinion (informal consultation) from residents/businesses in

the relevant area to gauge whether sufficient support exists for undertaking a statutory consultation (formal consultation) for a maximum 20mph speed limit.

- Produce an officer report detailing the results of the public opinion sought for consideration by the Executive Director. If support is determined and the Executive Director approves the undertaking of a statutory consultation, proceed with this course of action.
- Following the statutory consultation, produce an officer report for the Traffic Management Advisory Committee to consider. This report to contain details of the initial public opinion (informal consultation results) together with all objections received during the subsequent statutory consultation (formal consultation). Following consideration of the report, the Cabinet Member for Transport and Environment will make the decision whether or not the scheme should be approved for implementation.
- If scheme approved, then implement scheme.

3.1.4 Having followed the above process in the implementation of the first two areas in the north of the borough, it became evident that the target date of March 2018 to engage and statutorily consult the remaining three areas could not be met. The informal consultation followed by statutory consultation (formal consultation) would result in areas 3, 4 & 5 not being completed within these timescales.

It was felt necessary to simplify the process in response to feedback from the consultations carried out in areas 1 and 2, as there were questions about why people were being asked again about their views. By simplifying the process, people still have the opportunity to express their views at the formal stage.

3.1.5 In December 2016 a decision was taken by the Council's Cabinet meeting to take the consultation process direct to the statutory consultation (formal consultation) stage in order to accelerate the progress of the scheme. (Decision reference **A123/16**)

3.1.6 Although not the subject of this report, having followed the above procedure for the first two areas (previously referred to as North Croydon or Area 1 and north-east Croydon or Area 2), the implementation of the first two maximum 20mph schemes were completed in September 2016 and March 2017 respectively. Monitoring of the first area implemented, Area 1, is to commence in the next six months. The following sections of this report are in respect of the North–West Croydon, South-East Croydon and South-West Croydon 20mph proposal (also known as Areas 3, 4 & 5).

3.1.7 The public notices (statutory consultation) in respect of the Croydon areas 3, 4 & 5 maximum 20mph proposal were given on 18 January 2017. The closing date for representations to be received by was 15 February 2017, giving 7 days more than the required 21 days allowed for such statutory consultations. Areas 3, 4 & 5 were each subject to a separate notice and statutory consultation. The details of representations made objecting to the scheme are provided in later sections of this report.

- 3.1.8 Manchester City Council was recently reported by some of the national media to have halted the roll out of their own 20mph limits on residential streets. The reason given was that the reduction in average speeds were not as large as had been expected. Despite the reports of the scheme being halted, the council reported an overall average speed reduction of 0.7mph, cyclist casualties reported as reduced by 42% citywide and in the residential 20mph areas the fall was as low as 12%. The fall in pedestrian casualties was reported by the Council as 29% citywide and in the residential 20mph areas as low as 14%. The figures compare periods in 2012-14 with 2014-16.
- 3.1.9 In contrast to Manchester, the City of Edinburgh Council plans to continue with its roll out of the 20mph limits and has undertaken to proceed with their own city wide implementation. Edinburgh had already completed a pilot area in the south of the city. The Council Leader described the pilot scheme as having a positive impact.
- 3.1.10 On a London-wide basis, around 40% of residents live in a street which currently has a 20mph maximum speed limit. Croydon has implemented its first two 20mph maximum speed limit areas in the north of the borough. Area 1 came live in early September 2016, with Area 2 following in late March 2017. Post-implementation monitoring happens from 12 months after the new speed limit is in place, so it is still too early to draw any conclusive data from our own new 20mph areas.
- 3.1.11 There have been few complaints or correspondence received since the areas 1 & 2 in Croydon had their new speed limits in place. Generally complaints received have been regarding new signage and drivers exceeding the new speed limits. It is recognised that driver behaviour is not expected to change suddenly and compliance with the new limits is unlikely to happen overnight. It takes time for this behaviour change to happen and in line with experience elsewhere it is expected that compliance will improve over time.

3.2 Vision Zero

- 3.2.1 As part of Croydon's efforts to reduce road casualties further, the Streets, Environment and Homes Scrutiny Sub-Committee explored the Vision Zero concept at its meeting on 28 March 2017. Vision Zero is a concept which first originated in Sweden in 1994 and was introduced in 1997 when the Swedish parliament adopted it as the official road policy. The concept is founded upon the belief that the loss of a single life through a road accident is not an acceptable price to pay for mobility.
- 3.2.2 Vision Zero has resulted in success with Sweden having one of the lowest annual rates of road deaths in the world – in 2013 the number of road deaths in Sweden was 264, a drop of four-fifths since 1970.
- 3.2.3 According to Sweden's Vision Zero policy, system design should be based on the premise that humans make mistakes. The same understanding should influence roadway design, where traffic calming, well-marked crosswalks and pedestrian zones, and separated bike lanes can help minimize the consequences of a mistake.

3.2.4 Outside of Sweden a number of cities and countries have launched Vision Zero schemes to eliminate road fatalities whilst enabling mobility, including a number of cities in the United States. In 2014 the Mayor of New York City, Mayor de Blasio, launched Vision Zero in the City and since the introduction of the policy New York City has been able to counter the national trend. 2016 saw 230 traffic fatalities, the lowest in records, and marked three years of successive decline and a 23% reduction since 2013.

3.3 Vision Zero in London

3.3.1 At the Transport for London (TfL) Board meeting on 15 December 2016, the Board approved the Business Plan which included a reference to a “New Vision Zero target for road safety measures. The Business Plan goes on to say that, “In 2017, we will increase our ambition by adopting a ‘Vision Zero’ approach to road safety. This means maximising safety in all our road schemes, from infrastructure improvements to behaviour change and enforcement risks they pose to vulnerable road users. It is an important part of the Healthy Streets approach, because less traffic means streets are safer and more attractive for walking, cycling and using public transport.” Following the approval of the Business Plan, TfL will likely be reviewing what Vision Zero will mean in London and how it will be implemented.

3.3.2 The introduction of the area wide 20mph speed limits across the borough is an important measure that will complement any future commitment to Vision Zero by Croydon. Whilst road safety for our more vulnerable road users remains at the forefront of our thinking behind this project, it is expected that the 20mph speed limits will also bring environmental improvements, community cohesion, and the promotion of healthier lifestyles.

3.4 A safer and liveable borough for Croydon’s Residents

3.4.1 The speed of traffic is a key factor in many collisions, and it is certainly a major factor in the severity of the injuries sustained in any collision.

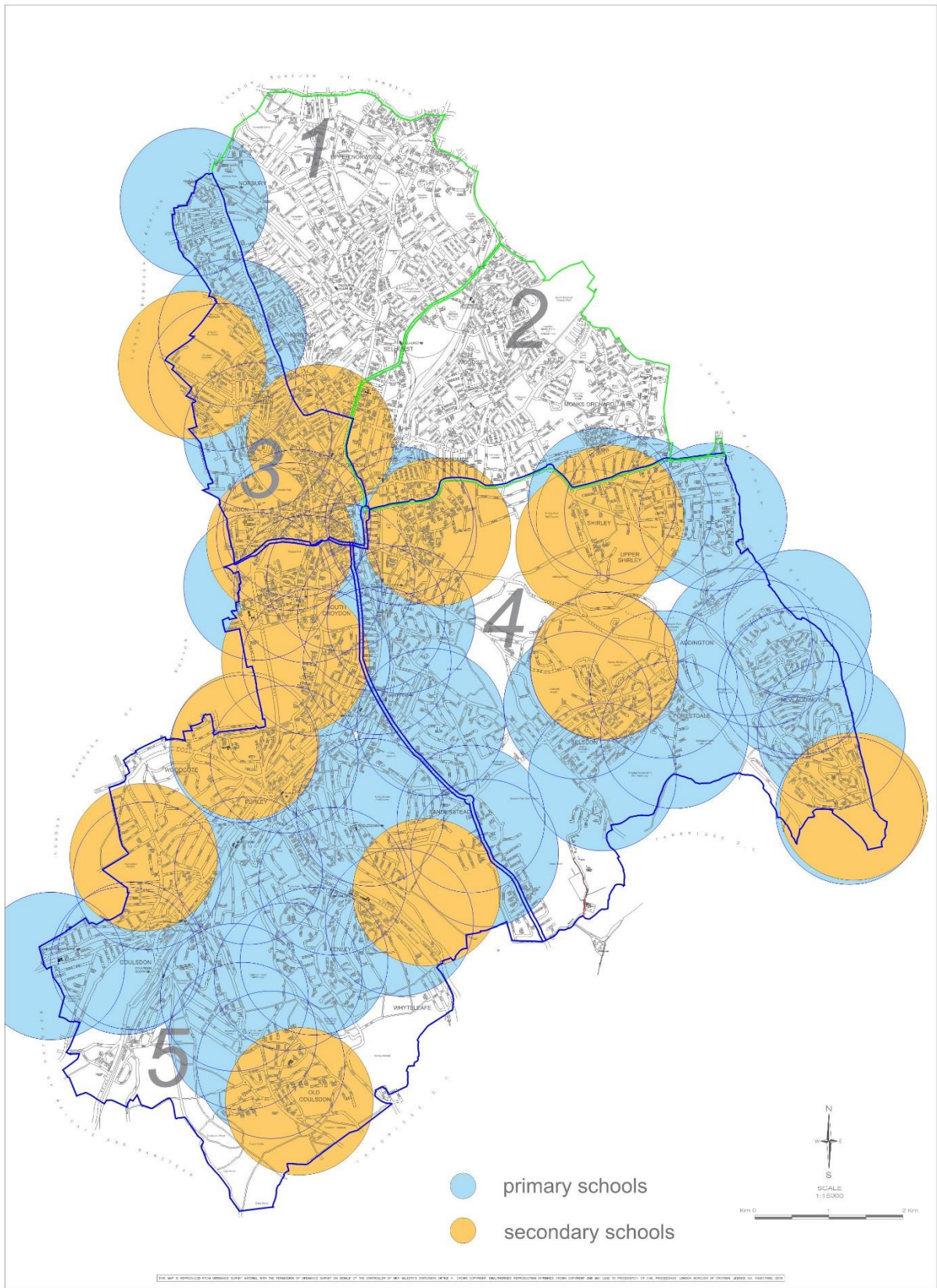
3.4.2 According to the Royal Society for Prevention of Accidents (RoSPA), if a pedestrian is hit by a vehicle travelling at 30mph there is a 8% chance that they will be fatally injured, compared to just a 1.5% chance at 20mph. Slower speeds will also reduce the opportunity for collisions occurring due to the shorter stopping distances. Average stopping distance in the Highway Code for a car travelling at 30mph is 23 metres, while at 20mph it is around half this distance at just 12 metres. Finally, according to RoSPA, slower speeds give people greater time to observe one another and take avoiding action, so it is clear that any reduction in speed not only reduces the severity of injuries, but also the chance of the collision taking place.

3.4.3 This is backed up by research by the Department for Transport (DfT) that shows that a 1mph reduction in speed can result in a 6% reduction in collisions. Based on Croydon’s current record of 896 collisions in 2015 an average 1mph speed reduction across the entire borough could result in 54 fewer collisions a year.

3.4.4 Whilst no-one likes to put a value on a life, according to the Department for Transport, the average costs to society per reported casualty based on 2015

data is, £15,450 per slight casualty, £200,422 per serious casualty and £1,783,556 per fatal casualty.

- 3.4.5 The road safety benefits from a reduction in traffic speeds is one of the key reasons why the borough is working towards the introduction of area wide 20mph speed limits in residential areas. This is designed to achieve those aims to improve road safety, particularly for our more vulnerable road users. Two such vulnerable groups are pedestrians and cyclists, both of which have a casualty record that is not reducing in line with our other successes of accident reduction for other road users, such as private cars and other motor vehicles. The introduction of the area wide 20mph speed limits across the borough is considered to offer the best opportunity to rectify this problem as well as bringing other benefits (according to RoSPA) such as environmental improvements, community cohesion, and promoting healthier lifestyles by making active travel choices more attractive. Road safety for the more vulnerable road users remains the primary aim of this project.
- 3.4.6 The plan below shows the schools in Croydon Areas 3, 4 & 5 and the areas around each school within a 10-15 minute walking distance (1km or 0.63 miles). This map demonstrates the areas in this part of the borough where a 20mph limit will provide road safety benefits for pupils and their parents/carers walking to school.



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3.5 Further Measures to reduce Casualties – Education, Enforcement and Compliance

3.5.1 The introduction of 20mph speed limits is not an end in itself, and further reductions in casualties can be achieved by other measures designed to complement the 20mph speed limits. Post-implementation monitoring will highlight areas where non-compliance by drivers is happening on a regular basis. Where necessary, further measures such as traffic calming schemes can be considered to reduce speeding, as can targeted enforcement via the Metropolitan Police.

3.5.2 Croydon Council and Croydon Borough Metropolitan Police have issued the following joint statement regarding enforcement of speed limits:

'The Metropolitan Police service and Croydon Council are committed to any initiative that might help reduce the number of road traffic collisions and subsequent casualties. We will continue to work together to address issues of speeding and provide physical solutions or enforcement action where there are high numbers of recorded collisions, complaints or high degrees of non-compliance. This will not change with the introduction of 20mph limits, but engineering solutions or enforcement action will only be targeted at sites where intelligence indicates that this is appropriate and proportionate for the situation. We further envisage Roadwatch, the Council's speed display signs and ANPR systems, and other engineering and enforcement methods, to all be part of the solution in aiding compliance.'

3.5.3 The Council also carries out road safety education in schools, delivers the “Safe Drive Stay Alive” educational campaign which targets young drivers, and in particular drives home the message that speeding costs lives and highlights the devastating and tragic personal impact on casualties, families and friends, as well as the wider community.

4 STATUTORY CONSULTATION

4.1.1 The Public Notices for the Croydon areas 3, 4 & 5 maximum 20mph speed limit appeared in the Croydon Guardian on 18 January 2017. The Notices were also published in the London Gazette on the same date as required by regulations.

4.1.2 In order to ensure that in particular residents and businesses were made aware of the statutory consultation and their right to object, officers arranged the putting up of public notices on lamp columns in every street in the areas. The street notices for each area are attached as Annex 2 in this report.

4.1.3 To ensure that every household had an opportunity to make their views heard a letter delivery was arranged by officers. The letter contained background information about the purpose of the scheme, its benefits and how to respond to the public notice concerning the proposal.

4.1.4 The council wrote to emergency services and public bodies which is usual practise and a regulatory requirement when carrying out a statutory consultation. No objections were received. Those contacted via letter or email were: Age UK, London Ambulance Service, Appyparking (software company that map parking

restrictions), CTC (Cycling UK), Croydon Cycling Campaign, Fire Service, Freight Transport Association, Road Haulage Association, Croydon Mail Centre, The Pedestrians Association, TfL, London Travel Watch, Police, Surrey County Council, L.B. Sutton, L.B. Lambeth, L.B. Merton.

- 4.1.5 Information regarding the statutory consultation and how to make a representation was also contained within the public notices and on the council website.
- 4.1.6 3357 representations were received in respect of the Areas 3, 4 & 5 maximum 20mph speed limit proposal. All received representations were considered carefully and a determination made as to whether it was a relevant objection or not. It is usual to provide an officer response to such objections as the Council should consider these before determining whether or not to uphold an objection.
- 4.1.7 It should be noted that the purpose of a public notice in relation to a statutory consultation is to invite objections to the scheme.
- 4.1.8 No objections to the scheme proposal were received from the Metropolitan Police, ambulance and fire services.
- 4.1.9 As part of the statutory consultation inviting objections, the Council received just over one hundred representations in support of the proposed speed limits.

The table in Section 5 of this report contains a summary of numbers of objections/representations received. A breakdown of numbers received on a specific subject or element of the 20mph speed limit scheme proposal up to the end of the statutory consultation period was produced.

4.2 Objections

- 4.2.1 Representations have been received commenting on and objecting to the scheme. Each representation was considered, and officers have determined which responses constituted a relevant objection. Categories for all the objections received were defined and each relevant objection has been broadly classified as per the table below.

4.2.2 A summary of objection numbers received concerning each category heading is shown in the table below:

Objection	AREA 3	AREA 4	AREA 5	AREAS 3, 4, & 5 COMBINED
Process objections	344	474	555	1373
Congestion/delays	779	1471	1674	3929
Pollution/emissions	521	817	874	2212
Accidents and Prevention	295	190	201	686
Enforcement	602	996	1077	2675
Cost to the public and organisations/business	398	453	490	1341
20mph blanket scheme is inappropriate/unjustified	407	360	690	1457
20mph scheme will not achieve its objectives	637	702	763	2102
Alternative suggestions to 20mph blanket scheme	791	933	1368	3092
TOTAL	4774	6396	7692	18862
Representations in support				103

4.3 Methodology in counting numbers of objections received.

4.3.1 If a respondent has objected on more than one of the above categories then each category has been counted as an individual objection.

A number of respondents have objected via email on a single category, once per each area, on up to as many as all 9 categories, which gives rise to up to 27 responses per individual. Each of these has been counted as a single objection i.e. 27 objections were counted.

The majority of respondents have replied with 1 email, covering 1, 2, or all 3 speed limit areas and individuals typically cover anything between one and ten points in their correspondence.

4.3.2 The total number of individuals who responded to the statutory consultation was approximately 2050 and the total number of single objections counted was 18862.

5 OBJECTIONS

5.1 Objection 1 – Process

5.1.1 Objection:

The Areas in the north of the borough were allowed to have their say via an opinion survey as to whether they support a 20mph limit or not. Areas 3, 4 & 5 have not been allowed to take part in an opinion survey and this is unfair.

Response:

Due to the time constraints and need to simplify the process described in sections 3.1.4 and 3.1.5 of this report the informal consultation (opinion survey) was not available to areas 3, 4 & 5. However, in areas 3, 4 & 5 every household has been written to, as in the north of the borough. Every household/property has been given an opportunity to put their views in to the Council regarding the 20mph speed limit. Each address in the three areas was sent a newsletter about the scheme, a copy of the public notice and guidance on how to make an objection or representation. Officers are confident that they have used all available means to ensure that letters were delivered to every household and street, and where there were reports of missed delivery they have followed this up by redelivering.

The process followed for areas 3, 4 & 5 is compliant with the statutory process and requirements. Whilst the informal consultation (opinion survey) for areas 1 & 2 went beyond that, it is not considered that residents in areas 3, 4 & 5 were disadvantaged by this approach, as evidenced by the large number of responses received

5.1.2 Objection:

There was insufficient Public Notification about scheme. The notification was not in accordance with Government Guidance. Letters have not been received by residents.

Response:

The legislation which lays out how Local Authorities undertake statutory consultation for the Croydon Area 20mph maximum speed limits is the Local Authorities Traffic Order Procedure (England and Wales) Regulations 1996. The relevant paragraph from these regulations is copied below:

Publication of proposals

7.—(1) An order making authority shall, before making an order,—

(a) publish at least once a notice (in these Regulations called a “notice of proposals”) containing the particulars specified in Parts I and II of Schedule 1 in a newspaper circulating in the area in which any road or other place to which the order relates is situated;

(b) in the case of an order under section 6 of the 1984 Act, publish a similar notice in the London Gazette;

(c) take such other steps as it may consider appropriate for ensuring that adequate publicity about the order is given to persons likely to be affected by its provisions and, without prejudice to the generality of this sub-paragraph, such other steps may include—

(i) in the case of an order to which sub-paragraph (b) does not apply, publication of a notice in the London Gazette;

(ii) the display of notices in roads or other places affected by the order; or

(iii) the delivery of notices or letters to premises, or premises occupied by persons, appearing to the authority to be likely to be affected by any provision in the order.

The notice was published in the Croydon Guardian on 18 February and also in the London Gazette on the same date.

Whilst this is not a legal requirement, notices were put up on lamp columns on every street affected. Newsletters with scheme details and how to object to the proposals were delivered to all affected addresses (over 90,000). Where reports of non-delivery were received, they were followed up by redelivery. As such it is considered that the process followed does comply with the requirements of legislation.

5.2 Objection 2 – Congestion/delays

5.2.1 Objection:

Scheme will create and/or increase congestion. The main roads are already congested so why push more traffic onto the main roads.

Response:

The two negative effects which come to mind as a result of congestion are an increase in journey times and the possibility of an increase in air pollution. It is considered that any significant increase in congestion is unlikely and these two issues have been addressed below.

The maximum speed limit is just one of a number of factors influencing journey time. 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 will continue to cater for through-traffic. If these facts are accepted, the extra delay can only be attributed to a 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 will be minimal. A vehicle driving at a constant 30mph compared to one which drives in exactly the same conditions but at 20mph will theoretically be quicker by 26 seconds over an 800 metre stretch (½ mile). On many residential roads in the borough it is rather difficult to find an 800m stretch where one can travel at 30mph throughout its length and this would negate any theoretical time advantage gained.

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 outweighed by the road safety benefits.

Any resultant shift to active travel modes such as cycling and walking would help to reduce the number of trips made by motor vehicles, which in turn could help to reduce congestion. Data published recently by RoSPA supports this where other 20mph limits have been implemented.

5.3 Objection 3 – Pollution/emissions

5.3.1 Objection:

Vehicles driving at lower speeds and the use of lower gears will result in increased emissions. Vehicles on roads for longer periods will increase noise and emissions. This will contribute to poor air quality.

Response:

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.

With regard to driving styles, studies carried out by Imperial College London observed that, across several routes in central London, a greater range of speeds occurred on 30 mph segments compared to 20mph segments. A larger proportion of time was spent accelerating and decelerating on 30 mph segments suggesting that 20 mph routes may facilitate smooth driving. These studies also identified the need for further research into emissions resulting from non-exhaust sources including brake and tyre wear.

Modal shift to walking/cycling or public transport as a result of a safer and more attractive environment for active travel would reduce emissions, as well as improving the health of individuals. Recent data available from RoSPA supports this.

5.4 Objection 4 – Accidents and Prevention

5.4.1 Objection:

Most accidents happen on main roads which are staying at 30mph, and statistics don't say which accidents happened at 30mph or 20mph. No evidence to say accidents were caused by speeding. There is no cost benefit from this 20mph proposal. Accident levels in residential streets are already low.

Response:

Facts that are known about casualties on a national scale are that in 2015, 747 people were killed, 15,517 were seriously injured and 133,753 slightly injured in reported road collisions on built up roads in Great Britain. A large proportion of these accidents occurred on residential roads, with 90 deaths on B roads in built-up areas and 292 deaths on other minor roads in built-up areas. (RoSPA). So 382 out of 747 fatalities occurred on B roads and minor roads in built up areas in Great Britain.

TfL data is that for all severities in 2015 (severities consist of slight, serious and fatal injuries), 65% occurred on A roads, 8% on B roads and 13% on C roads, with 14% on unclassified roads. This further supports the case that a large proportion of casualties happen on residential roads.

Research by the Department for Transport (DfT) shows that a 1mph reduction in speed can result in a 6% reduction in collisions. Based on Croydon's current record of 896 collisions in 2015, an average 1mph speed reduction across the entire borough could result in 54 fewer collisions a year.

The cost benefit achieved by accident prevention, even by a small reduction in vehicle speeds, has been established and there is a clear benefit. Whilst no-one likes to put a value on a life, according to the Department for Transport, the average costs to society per reported casualty based on 2015 data is, £15,450 per slight casualty, £200,422 per serious casualty and £1,783,556 per fatal casualty.

The evidence is that a significant number of collisions happen on residential roads and these can be reduced by a relatively small reduction in average vehicle speeds. There is also a clear cost benefit to the public resulting from speed reduction.

5.4.2 Objection:

Drivers will be concentrating on their speedometers and concentrate less on the road.

Response:

Officers can find no evidence that suggests driving at 20mph would require any more attention paid to a speedometer than driving at any other speed, be it 20mph, 60mph or 70mph.

5.4.3 Objection:

Extra signs will cause confusion.

Response:

The signage will be designed and installed in accordance with the Traffic Signs Regulations and General Directions 2016. This is the national standard for road signs and a legal requirement. Therefore Croydon's 20mph limits will be signed just the same as the other residential roads in London which already have a 20mph speed limit and this should not give rise to confusion for motorists.

5.4.4 **Objection:**

The scheme will make roads more dangerous and give a false sense of security to pedestrians. 20mph speeds do not give more time to cross road as claimed by the Council. Lower speeds allow vehicles to drive closer and so more difficult for pedestrians to cross.

Response:

A car travelling at 20mph travels at 8.9m/s. At 100m distance it allows 11.2 seconds time to cross. At 30mph (13.3m/s) this crossing time is reduced to 7.5 seconds. When roads are congested the crossing time is not likely to vary as speeds are low anyway, so it is not thought there would be any net change by having a 20mph limit. Pedestrians who cross roads are likely to make a judgement based on what they observe vehicles doing rather than on the actual speed limit of the road.

Evidence from RoSPA is that lower speed limits improves road safety and assists pedestrians and cyclists to move around more safely.

5.5 **Objection 5 – Enforcement**

5.5.1 **Objection:**

No enforcement will be likely. The Police don't have resources to enforce the 20mph speed limit. The Police will not enforce or have refused to enforce. Enforcement is impossible or impractical.

Response:

As stated earlier in this report, the police in Croydon say they will continue working with the Council to address speeding problems. Please refer to paragraph 3.5.2 for the police statement regarding enforcement.

The Road Safety Camera Partnership, who manage the speed ("Gatso") cameras in London will continue this means of enforcement with the cameras already at their current sites in the borough. Similarly, the mobile enforcement camera sites around the borough will continue as usual where the speed limit changes.

5.5.2 **Objection:**

Existing 30mph is not enforced nor observed, that is the problem. All will suffer as a result of a few.

Response:

A recent report from the police states that there have been 21,581 speeding fines issued and 781 Traffic Offences Reports, all relating to speed, in Croydon from April 2016 to March 2017.

It is not correct to say there is no enforcement. It is recognised that there are places where speeding issues are persistent and difficult to deal with and the Council are continuing to work with the police to eliminate this.

Evidence from DfT and RoSPA shows that 20mph limits will reduce average vehicle speeds and this contributes to a reduction in the number of collisions. Evidence is also that maximum speeds are reduced by a greater amount than the average speed reduction.

5.5.3 **Objection:**

Existing 20mph schemes/schemes in the north of borough are not enforced and are totally ignored so why bring in more?

Response:

Officers are aware of recent enforcement carried out on the Upper Norwood area of Area 1 Croydon – North. Police stopped motorists and advised them of their excessive vehicle speed, following this up by writing to contraveners in an effort to ensure future compliance, without enforcing in a fashion that could be viewed as too heavy handed, given the very recent implementation of the scheme. The police have said they will enforce the 20mph speed limit on roads just as they enforce 30mph.

Highway authorities elsewhere who have undertaken similar schemes have not anticipated that everyone would drive within the 20mph new speed limit from the outset. Over time however, compliance is expected to increase as motorists become more familiar with the new limits.

Croydon Council will work with the police to target areas where non-compliance is persistent. The Council will look to implement further measures to reduce speeding at prioritised sites, where this is warranted.

5.6 **Objection 6 – Cost to the public and organisations/business**

5.6.1 **Objection:**

Increased fuel use through driving at 20mph

Response:

Generally the response to this objection is similar to the response given for increased emissions, which are of course directly proportional to fuel consumption. Any significant change to fuel consumption is likely to be marginal and unlikely to result in increased costs. This was evidenced by traffic studies by Imperial College London.

5.6.2 **Objection:**

Major roads will carry more traffic resulting in greater cost to individuals and businesses through delays.

Response:

The majority of delays occur in the peak hour times and it is not anticipated that there will be a major displacement of vehicles onto main roads simply because residential roads are 20mph. This has not been observed in the 20mph speed limit areas recently rolled out, although it is too early to see any longer term trends in traffic distribution. Area 1 Croydon-North was the first area to be made 20mph, implemented in September 2016, and there have been no reports nor

complaints about increased congestion/journey times and the associated costs resulting from the new speed limit.

RoSPA data also indicates that modal shift to active travel modes reduces the number of trips made by private car which helps to reduce congestion and delays.

5.6.3 Objection:

I object to have to pay out of increased council tax (TfL/GLA forms part of Council Tax).

Response:

The area wide 20mph speed limits are funded from the public purse so there is a direct link with council tax and Greater London Authority/Transport for London which give grant from the tax payer. The police, other emergency services and the NHS are also funded by the tax payer and they would have to fund the cost of accidents. The 20mph limits with the associated casualty reduction will more than compensate for the cost of the scheme implementation. Cost of casualties have already been discussed in the report.

5.6.4 Objection:

The scheme cost is too high and the scheme cost is not justified.

Response:

The cost benefit of 20mph limits has been discussed in the "Vision Zero" section of this report. According to the Department for Transport (DfT) the average costs to society per reported casualty based on 2015 data is, £15,450 per slight casualty, £200,422 per serious casualty and £1,783,556 per fatal casualty.

The total cost of all the personal injury collisions recorded in Croydon from 2011 to 2015 is therefore estimated to be around £166,034,856. However, this figure should be used with some caution as it is based on national averages and does not take into account the yearly variations in costs that occurred during this period.

The cost of introducing 20mph limits in Areas 3, 4 & 5 is around £600,000, funded by TfL via Local Implementation Plan funding. If a single fatality is prevented then it would be difficult to dispute that this does not represent value for money to the public.

Even a marginal reduction in speeds will reduce the number of collisions (RoSPA data) and there is a cost saving to be made, this is justification for the reduced speed limit in terms of public money saved.

5.6.5 Objection:

Money would be better spent repairing pot holes/resurfacing/street cleaning. It would be better spending money on the NHS or more urgent causes

Response:

The funding for this proposal is via the TfL LIP programme of schemes. This was agreed with TfL in 2014-15 and the funding relates directly to the outgoing

Mayor for London's (Boris Johnson's) Transport Strategy. This funding was approved to deliver the 20mph speed limits and cannot be transferred to carry out highway maintenance operations such as road repairs or cleansing operations.

Reducing casualties will create savings within the NHS which has the potential to be far more substantial than the cost of the 20mph schemes.

5.6.6 Objection:

Scheme is to generate income from fines

Response:

The Council does not receive any income from speeding fines and does not have any legal powers to enforce speed on the roads. The aim of the proposal is to reduce the number and severity of road traffic casualties.

5.6.7 Objection:

Will be burden on Police resources (very expensive to Police)

Response:

The police will continue to enforce speed limits on 20mph roads just as they have done when the same roads had a 30mph speed limit.

5.6.8 Objection:

Signs will be ignored/scheme disrespected (waste of money).

Response:

This is not expected to be the case, but if it is then that will be established as part of the monitoring of the scheme. This is not a reason to not proceed with the roll out of 20mph speed limits. If there are areas of persistent non-compliance then there are options for further physical interventions, road safety education, and enforcement as appropriate, depending on the nature of the road and driver behaviour.

Evidence from DfT and RoSPA shows that 20mph limits will reduce average vehicle speeds and this contributes to a reduction in the number of collisions. Evidence is also that maximum speeds are reduced by a greater amount than the average speed reduction.

5.7 Objection 7 – 20mph blanket scheme is inappropriate/unjustified

5.7.1 Objection:

Roads should be considered on an individual basis / No proper analysis carried out

Response:

The aim of this project is to improve road safety on all residential roads within the area. In addition, having individual residential roads in an area at 20mph and others in the same vicinity at 30mph would create confusion for motorists as the speed limit would be changing from road to road. The area based approach is clearer for motorists to understand. The distinction between the

main road network and the residential road network assists drivers to understand what the speed limits are far more clearly than the alternative individual roads approach to speed limits.

5.7.2 Objection:

Blanket speed limit restrictions are wrong as they are based on officer/elected members opinion.

Response:

The decision to undertake speed limit reduction is to reduce road traffic casualties and this is based on evidence not opinion. Lowering the speed limit reduces the number collisions and reduces the severity of injuries for those collisions that do occur.

The scope of the 20mph limits being proposed were developed by the working group, as described in 3.1.2 of this report. It is not correct to say this was based on elected members/officers opinion. The purpose of the working group was to advise on any decisions, based on experience of other areas outside of Croydon.

5.7.3 Objection:

It is unnecessary/illogical/unreasonable to move traffic at 20mph when there is no need, weather is good, roads are clear.

Response:

Collisions occur when all of the road conditions given above are prevalent. The reason for having area based 20mph limits are to prevent collisions and reduce the severity of those that do occur.

5.7.4 Objection:

Existing residential roads are already narrow/parked/traffic calmed

Response:

Not all residential roads in Croydon are narrow, parked or traffic calmed. Many residential roads are wide and/or with little parking and it is quite possible to drive in excess of a 20mph or even 30mph speed limit on these roads.

It is also accepted that there are a number of roads or sections of these roads where it is difficult to achieve speeds greater than 20mph in a car. Whether there is a 20mph limit in place or not would therefore not influence speeding in these particular roads (or sections of road) by cars and larger vehicles. The Council does however receive complaints regarding motorcycles and mopeds who do ride inconsiderately and at excessive speeds. A narrowed road would not prevent this.

It would be confusing for motorists if speed limits on residential roads changed from 30 to 20 from street to street in an effort to target streets more vulnerable to speeding. This justifies the need for a consistent approach.

5.7.5 Objection:

Existing 20mph zones will become less effective.

Response:

20mph zones by definition have physical traffic calming features (eg speed humps or cushions, chicanes) which physically deter speeding. They are self-enforcing via the traffic calming features, so no change in vehicle speed would be anticipated via roll out of new 20mph limits. Generally there are very few complaints of excessive speed reported by residents in these zones.

20mph limits can rely on signage only, but it is often the case that there may be speed humps or cushions within a 20mph speed limit area.

Any existing 20mph limit areas would simply become part of the new area wide speed limits. These will be monitored as part of new areas already rolled out or proposed, and problem areas targeted for further measures if traffic speeds are too high.

Some of the existing 20mph limits are on the main road network and are quite distinctive. Many are outside schools or in district centres and are supplemented by signage which makes it quite clear to motorists they are entering an area with a distinct characteristic and this helps to remind motorists to observe the speed limit.

5.7.6 Objection:

People will be penalised for driving above 20mph when some roads are perfectly safe to drive above that limit.

Response:

As part of the statutory consultation some respondents are putting forward certain roads they feel should remain at 30mph and these are being considered as part of this consultation process. The list of roads put forward can be found in Annex 3. Likewise, roads which some respondents think should be 20mph are also included in Annex 3.

A number of London local authorities have recently implemented 20mph speed limits on all of their roads but Croydon Council has chosen not to do this and will consider excluding some roads from this roll out of 20mph speed limits as part of this consultation.

5.7.7 Objection:

20mph speed impractical/causes strain on vehicle

Response:

A motorist driving on urban London roads which are typical of many in our borough will know that the range of speeds driven at are quite wide and highly variable. In slow moving traffic a driver would spend part of the journey driving at speeds as slow as 0.5mph and also up to the speed limit, even in a short stretch of road. Much time is spent at low speeds, requiring constant gear changing and this would no doubt cause strain on a car engine.

It is driving style and driving behaviour rather than speed limit which causes strain on motor vehicles. Adopting a smooth driving style reduces engine strain

no matter what the speed limit or traffic condition is. Driving styles/behaviours which include regular acceleration and braking cause engine, brake and tyre wear and increased fuel consumption/emissions.

5.7.8 Objection:

Some roads naturally will not feel like a 20mph road

Response:

As part of the statutory consultation some respondents are putting forward certain roads they feel should remain at 30mph and these are being considered as part of this consultation process. The list of roads put forward can be found in Annex 3. Roads which some respondents say should be 20mph are also included in Annex 3.

5.7.9 Objection:

Learner drivers will have less practice at driving at 30mph

Response:

At present around 40% of London's residents live on a road with a 20mph limit. It is not difficult to find 30mph roads and 40mph roads both in the borough and adjoining boroughs where learner drivers can avail themselves of this experience. The main road network in Croydon is proposed to remain at its current speed limit.

5.8 Objection 8 – 20mph scheme will not achieve its objectives

5.8.1 Objection:

The scheme will not achieve its objectives to encourage walking, encourage cycling.

Response:

Responses in the opinion surveys where 20mph limits were previously consulted on revealed that many respondents said they would walk or cycle more if roads were made 20mph. This view was also reflected by those who were not in favour of 20mph limits, many said it would encourage them to walk or cycle. In area 2, North-east Croydon, 12% of respondents said they would consider cycling more if the area had a 20mph limit. 11% of respondents said they would walk more if the area had a 20mph limit.

Recent RoSPA data (City of Edinburgh Council 20mph limits) shows modal shift of 3% reduction in car journeys, 7% increase in journeys by foot, 5% increase in journeys by bicycle.

5.8.2 Objection:

The scheme will not achieve its objectives to improve the environment

Response:

It is important to highlight the contribution that 20mph zones and limits can have in encouraging more physical activity, such as walking and cycling, by contributing towards a safer and more pleasant environment. The money spent

on the schemes can also greatly improve the character of a residential area and quality of life of the residents. A modal shift toward more walking and cycling, as well as public transport use, would improve air quality as well as the public health benefits. The figures shown for City of Edinburgh Council in the previous paragraph show there is evidence for this.

5.8.3 Objection:

The scheme will not achieve its objectives to stop fast driving at late night/early morning

Response:

It is difficult to find an intervention that can be applied on a borough wide basis which could completely eliminate speeding. Physical traffic calming is effective at speed reduction, but to install this in a borough wide basis would not be possible due to the magnitude of investment required.

The Council will continue to work with the police to reduce the incidence of speeding and dangerous driving, by prioritising streets where incidence of this kind of driving behaviour is persistent. As well as enforcement by the police, the Council can install additional signage, speed display devices and Automatic number plate recognition (ANPR) cameras or physical traffic calming where problems of speeding persist.

5.8.4 Objection:

The scheme will not achieve its objectives to discourage through traffic

Response:

When the main road network is not busy then a motorist has a choice - whether to travel through smaller side streets at 20mph or stay on the main road network, which allows them to travel up to 30mph. Their journey on main roads can often be more continuous, i.e. fewer junctions and turns to negotiate, less need to give way to oncoming traffic in narrower roads. It is likely that at times some will choose the main road network rather than drive through an area with a 20mph speed limit.

5.9 Objection 9 – Alternative suggestions to 20mph blanket scheme

5.9.1 Objection:

Roads should be considered on an individual basis

Response:

This has been covered elsewhere in this report, the option of having individual residential roads in an area at 20mph and others in the same vicinity at 30mph would create confusion for motorists as the speed limit would be changing from road to road. The area based approach is consistent and clearer for motorists to understand. The distinction between the main road network and the residential road network assists drivers to understand what the speed limits are far more clearly than the alternative individual roads approach to speed limits.

5.9.2 Objection:

The 20mph speed limit should only be outside schools/hospitals/busy High streets etc.

Response:

This would not achieve the objective of making residential roads safer and more pleasant places to live. The casualty rate on these roads would not be improved. Referring back to the plan in this report showing which roads lie within a 1km radius from many of the borough's schools in areas 3, 4 & 5, it can be seen that the proposal will incorporate the majority of roads in the immediate vicinity of any given school.

5.9.3 Objection:

Council should consider a part time 20mph speed limit only

Response:

Part time speed limits would not be practical to implement on residential roads. It would be difficult to determine what times are appropriate and for which roads and the signage required would be more complicated. Motorists would find this confusing as there would not be a consistent time which would suit all roads. 20mph at all times is easier for all to understand.

5.9.4 Objection:

A blanket 20mph speed limit is not the right approach

Response:

The evidence that 20mph speed limits reduce speed and accidents shows that it is an approach that can reduce casualties. This is the aim of the proposal. There is research and case studies to support this and some of this research from DfT, RoSPA and Imperial College London has already been referred to in this report.

5.9.5 Objection:

25mph is appropriate/safe speed for many of the roads and so why force everyone to 20mph

Response:

The Traffic Signs Regulations and General Directions 2016 prescribes what highway signage can be used by a highway authority. 25mph is not included as a permissible speed limit on the highway in the United Kingdom.

5.9.6 Objection:

Targeted traffic calming would be a better approach

Response:

Targeted traffic calming is costly and to cover a borough the size of Croydon is not possible with the funding available. There are also detriments to residents through increased noise and vibration for some physical traffic calming. The benefits of a borough wide scheme in terms of sustainable travel, improving the environment and improving safety for all would not be achieved. The current

proposal is to implement the 20mph speed limits and then target priority areas where non-compliance is shown through monitoring. Such targeting can include physical measures to slow traffic, along with enforcement and other measures.

6 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

6.1

1. Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2017/18	2018/19	2019/20	2020/21
	£'000	£'000	£'000	£'000
Revenue available				
Expenditure				
Income				
Effect of decision from report				
Expenditure				
Income				
Remaining budget				
Capital available				
Expenditure	300	300		
Effect of decision from report				
Expenditure	292.5	300		
Remaining budget	(7.5)	0		

2. The effect of the decision

This scheme is funded by Transport for London (TfL) from the Council's 2017/2018 and 2018/2019 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 Croydon areas 3, 4 & 5 is not agreed to proceed, the allocated funding may not be fully spent.

4. Options

The only alternative options are to do nothing should this recommendation not proceed, or find alternative schemes which would then be subject to agreement with TfL.

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: Luke Chiverton, Head of Finance (Place and Resources).

7 COMMENTS OF THE COUNCIL SOLICITOR AND MONITORING OFFICER

7.1 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.

7.2 The Council needs to comply with the necessary requirements of the Local Authorities Traffic Orders (Procedure) (England and Wales) Regulations 1996 by giving the appropriate notices and receiving representations. Such representations have been considered as part of the decision making process.

Approved by: Jacqueline Harris-Baker, Director of Law, Council Solicitor and Monitoring Officer

8 HUMAN RESOURCES IMPACT

8.1 There are no immediate human resources impacts arising from this report

Approved by Jason Singh, Head of HR Employee Relations on behalf of the Director of HR.

9 EQUALITIES IMPACT

9.1 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.

9.2 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.

9.3 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.

9.4 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 shall 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.

10 ENVIRONMENTAL IMPACT

- 10.1 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 98.5% of pedestrians involved in a collision at 20mph survive, compared with only 92% 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 expected 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.

11 CRIME AND DISORDER REDUCTION IMPACT

- 11.1 There are no direct implications arising from the proposals.

12 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 12.1 The proposed scheme is designed to reduce both the number and injury severity of road traffic casualties.
- 12.2 The proposed scheme should assist the Council in encouraging more sustainable transport use such as walking and cycling, by reducing vehicle speeds, improving road 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

13 OPTIONS CONSIDERED AND REJECTED

- 13.1 A 20mph zone (which requires physical traffic calming, such as road humps) was considered for the area, however this was rejected on the grounds of high cost. A 20mph zone must be self-enforcing, which would require extensive traffic calming features. Construction costs for these would far exceed the budget available for the 20mph speed limits proposal.

CONTACT OFFICER: Mike Barton-Service Manager Highway Improvement x61977
Sue Ritchie-Senior Engineer Highway Improvement x63823

ANNEXES:

- 1) Croydon Areas 3, 4 & 5 Plans
- 2) Public Notices
- 3) List of additional roads suggested within the areas to consider a) remaining at 30mph and b) additional roads to include as 20mph

BACKGROUND PAPERS: Detailed analysis spreadsheet – responses to statutory (formal) consultation.