

To: Councillor Stuart King (Chair)

Councillors Jane Avis, Sara Bashford, Robert Canning, Vidhi Mohan and Pat Ryan.

Reserves:

Councillors Jamie Audsley, Simon Brew, Sherwan Chowdhury, Stephen Mann, Andrew Pelling and Andy Stranack.

A meeting of the **TRAFFIC MANAGEMENT ADVISORY COMMITTEE** which you are hereby summoned to attend, will be held on **Wednesday 5th October 2016 at 6:30 p.m.**, in **Room F10, Town Hall, Katharine Street, Croydon. CR0 1NX.**

JACQUELINE HARRIS-BAKER
Acting Council Solicitor and Acting
Monitoring Officer
London Borough of Croydon
Bernard Weatherill House
8 Mint Walk, Croydon CR0 1EA

Victoria Lower
Members Services Manager
020 8726 6000 ext. 14773
victoria.lower@croydon.gov.uk
www.croydon.gov.uk/agenda
27 September 2016

Members of the public are welcome to attend this meeting. If you require any assistance, please contact Victoria Lower as detailed above.

AGENDA - PART A

1. Apologies for absence

2. Minutes (Page 1)

To approve the minutes of the last meeting held on 6 July 2016 as a correct record.

3. Disclosure of Interest

In accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, Members and co-opted Members of the Council are reminded that it is a requirement to register disclosable pecuniary interests (DPIs) and gifts and hospitality in excess of £50. In addition, Members and co-opted Members are reminded that unless their disclosable pecuniary interest is registered on the register of interests or is the subject of a pending notification to the Monitoring Officer, they are required to disclose those disclosable pecuniary interests at the meeting. This should be done by completing the Disclosure of Interest form and handing it to the Business Manager at the start of the meeting. The Chairman will then invite Members to make their disclosure orally at the commencement of Agenda item 3. Completed disclosure forms will be provided to the Monitoring Officer for inclusion on the Register of Members' Interests.

4. Urgent Business (if any)

To receive notice from the Chair of any business not on the Agenda which should, in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

5. Exempt Items

To confirm the allocation of business between Part A and Part B of the Agenda.

6. Petitions - Exeter Road, Boulogne Road and Princess Road - Requests for parking controls (Page 7)

This report considers petitions received from residents of Exeter Road, Boulogne Road and Princess Road requesting residents parking schemes and recommends informally consulting residents of these roads and the surrounding area on possible extensions to the Croydon Controlled Parking Zone – East Outer and North Permit Zones.

7. Sutherland Road Area - Objections to the proposed extension of the Croydon CPZ (North Permit Zone) (Page 19)

The purpose of this report is to consider objections received from the public following the formal consultation process on a proposal to extend the existing Croydon Controlled Parking Zone (North Permit Area) to Greenside

Road, Pemdevon Road, Sutherland Road, Wentworth Road, Priory Road, Canterbury Road, Wortley Road, Donald Road and Lancing Road with a combination of Shared-Use Permit/Pay & Display machines (8 hour maximum stay) and single yellow lines operating from 9am to 5pm, Monday to Saturday.

8. Duppas Hill Lane proposed off-street car park - Report on objections
(Page 53)

The purpose of this report is to consider objections received from the public following the formal consultation process on a proposal to introduce a shared-use Permit / Pay & Display off-street car park in Duppas Hill Lane. Due to comments and objections from local residents in the form of a petition, it is proposed to introduce a new Housing type permit scheme for the off-street parking area in Duppas Hill Lane subject to a further public notice and consideration of any objections.

9. Objections to proposed parking bays (Page 61)

The purpose of this report is to consider objections from the public following the formal consultation process on proposals to introduce space for up to seven cars in the free parking bays in Chipstead Valley Road, Coulsdon, five new shared-use bays in Chatsworth Road, Croydon, three new bays in Edridge Road, Croydon and six new shared use parking bays in Gloucester Road, Croydon.

10. North-east Croydon Area-Wide 20mph speed limit Statutory Consultation - Report on objections
(Page 81)

This report details the objections received in response to the giving of public notice for the introduction of a maximum 20mph speed limit for the north-east Croydon area.

11. [The following motion is to be moved and seconded as the “camera resolution” where it is proposed to move into part B of a meeting]

That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended.

AGENDA - PART B

None

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Traffic Management Advisory Committee

Meeting held on Wednesday 6 July 2016 at 6:30 p.m. in Town Hall, Katharine Street, Croydon CR0 1NX

**DRAFT
MINUTES - PART A**

Present: Councillor Stuart King (Chair)
Councillors Jane Avis, Robert Canning, Vidhi Mohan, Pat Ryan and Andt Stranack.

Also present: Councillors Jeets Bains, Stephen Mann, Maggie Mansell and Paul Scott

Absent: Councillor Sara Bashford

Apologies: Councillor Sara Bashford

MINUTES - PART A

A1 Minutes of the meeting held on Tuesday 26th April 2016

The Minutes of the meeting held on 26 April 2016 were approved.

A2 Disclosure of Interest

None

A3 Urgent Business (if any)

None

A4 Exempt Items

None

A5 PETITIONS: SELBORNE ROAD AREA – REQUEST TO REVIEW PARKING CHARGES; CECIL ROAD – REQUEST FOR PARKING CONTROLS; DENMARK ROAD & ENMORE AVENUE – REQUEST FOR PARKING CONTROLS

The Traffic Management Advisory Committee considered the following
:-

1.1 A petition from parents, teachers and governors of Archbishop Tenison's CE High School to reconsider its decision on the increase in on-street parking charges.

1.2 The Committee **RESOLVED** to recommended to the Cabinet Member for Transport and Environment that they agree to retain the current £3.20 daily charge.

1.3 A petition from residents of Cecil Road requesting a residents only parking scheme and one-way working in the road and consult residents in Cecil Road, Brading Road, Rosecourt Road, Thornton Avenue, Lavender Rd, Songhurst Close and Aurelia Road (from Mitcham Road to Lavender Road on a possible Controlled Parking Zone with shared-use Permit / Pay & Display bays operating 9am to 5pm, Monday to Saturday.

1.4 Consider a petition from residents of Denmark Road and Enmore Avenue requesting Residential Permit Parking and consult residents in Denmark Road, Enmore Avenue, Alfred Road (Holland Road to Enmore Avenue), Enmore Road and Birchanger Road (Tennison Road to Enmore Road) on a possible extension of the existing South Norwood Controlled Parking Zone with shared-use Permit / Pay & Display bays operating 9am to 5pm, Monday to Saturday.

1.5 The Committee **RESOLVED** to recommended to the Cabinet Member for Transport and Environment that they note that in accordance with the Leaders' delegation, decision reference 20/16/LR that the results of the consultations on parking controls in the above two areas (1.3 & 1.4) will be reported to the Executive Director Place.

1.6 The Committee recommended to the Cabinet Member for Transport and Environment that they note that the Highways Improvement Manager, Streets Directorate, will inform the instigator of the petitions of these decisions.

A6

BINGHAM ROAD AREA, PROPOSED EXTENSION OF THE EAST OUTER ZONE- RESULTS OF CONSULTATION

The Traffic Management Advisory Committee **RESOLVED** to recommend to the Cabinet Member for Transport and Environment that they agree:

1.1 Not to extend the Croydon Controlled Parking Zone (East Outer Permit Zone) into the Bingham Road Area at the current time but to instruct officers to monitor traffic and parking issues, including communications from local residents, for future review.

1.2 To instruct officers to inform the petition organiser of the decision

A7

ABINGDON ROAD AREA, PROPOSED EXTENSION OF THE NORBURY CPZ - RESULTS OF CONSULTATION

The Traffic Management Advisory Committee having considered the responses received to the informal consultation on the proposal to extend the Norbury controlled parking zone (CPZ) into parts of the Abingdon Road area **RESOLVED** to

recommend to the Cabinet Member for Transport and Environment,

that they agree :-

1.1 To carry out a formal consultation to extend the existing Norbury CPZ to include Bishops Park Road (from the borough boundary to the existing zone), part of Upwood Road (between the junctions with Lloyd Avenue and Croindene Road) and the remaining section of Croindene Road as shown on Plan no. PD-304a.

1.2 That the Highway Improvement Manager, Streets Directorate be authorised to give notice of the proposals and subject to receiving no objections on the giving of the public notice to make the necessary Traffic Management Orders under the Road Traffic Regulation Act 1984 (as amended).

1.3 To note that any material objections received following the giving of public notice will be reported to the Executive Director for Place for consideration in accordance with the delegation from the Leader, decision reference 20/16/LR.

1.4 To note that Officers shall inform the respondents and consultees of the decision

A8

SOMERSET GARDENS - RESULTS ON CONSULTATION OVER PROPOSED PARKING CONTROLS

The Traffic Management Advisory Committee having considered the responses received to the informal consultation on the proposal to introduce a controlled parking scheme in Somerset Gardens **RESOLVED** to recommend to the Cabinet Member for Transport and Environment that they;

1.1 Agree to carry out a formal consultation to introduce a controlled parking scheme in Somerset Gardens as shown on Plan no. PD-305.

1.2 Authorise the Highway Improvement Manager, Streets Directorate to give notice of the proposals and subject to receiving no objections on the giving of the public notice to make the necessary Traffic Management Orders under the Road Traffic Regulation Act 1984 (as amended). Note that any material objections received following the giving of public notice will be reported to the Executive Director for Place for consideration in accordance with the delegation from the Leader, decision reference 20/16/LR.

1.3 Note that Officers shall inform the respondents and consultees of the decision.

A9

GREEN LANE – OBJECTIONS TO THE PROPOSED INTRODUCTION OF A FREE CPZ IN GREEN LANE AND BEAUFORT GARDENS amended report circulated 1/7/16

That the Traffic Management Advisory Committee having considered the objections received to the proposed introduction of a free Controlled Parking Zone in Green Lane (between the party wall of Nos. 216 and 218 Green Lane and its junction with Briar Avenue) and Beaufort Gardens, with a combination of free parking bays and single

yellow lines operating 11am to 12 noon, Monday to Friday
RESOLVED to recommend to the Cabinet Member for Transport and Environment that they:

1.1 Agree for the reasons detailed in the report to proceed with the original proposals in both roads with the exception of relocating the bay outside no.8 Beaufort Gardens to the opposite side of the road.

1.2 Instruct officers to inform the objectors of the above decision.

A10 SOUTHWOOD AVENUE – OBJECTIONS TO THE PROPOSED EXTENSION OF THE COULSDON CONTROLLED PARKING ZONE, FREE AREA

That the Traffic Management Advisory Committee having considered the objections received to the proposed extension of the Coulsdon free Controlled Parking Zone into Southwood Avenue **RESOLVED** recommend to the Cabinet Member for Transport and Environment that they:

1.1 Agree for the reasons detailed in the report to proceed with the original proposals with the exception of considering relocating the bay outside No.15 to the opposite side of the road, subject to agreement with affected residents.

1.2 Instruct officers to inform the objectors of the above decision.

A11 OBJECTIONS TO PROPOSED PARKING RESTRICTIONS additional maps added 1 July 2016

That the Traffic Management Advisory Committee having considered the objections received to the proposed parking restrictions and the officer's recommendations in response to these in:

- Mayfield Road, Croham
- Namton Drive, West Thornton
- Albert Road and Belmont Road, Woodside

RESOLVED to recommend to the Cabinet Member for Transport and Environment that they:

1.1 Agree the following:

• Mayfield Road, South Croydon – not to proceed with the original proposal but to monitor parking along this section of the road for future review.

• Namton Drive, West Thornton – proceed with proposal

• Albert Road and Belmont Road, Woodside – consult residents on a possible amended scheme to introduce double yellow lines throughout the circular turning area.

1.2 Delegate to the Highway Improvement Manager, Highways, the authority to make the necessary Traffic Management Order under the Road Traffic Regulation Act 1984 (as amended) in order to implement recommendation 1.1 above.

1.3 Instruct officers to inform the objectors of the above decision.

MINUTES - PART B

None

The meeting ended at 19:48

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Croydon Council

REPORT TO:	TRAFFIC MANAGEMENT ADVISORY COMMITTEE 5 October 2016
AGENDA ITEM:	6
SUBJECT:	PETITIONS: EXETER ROAD – REQUEST FOR PARKING CONTROLS BOULOGNE ROAD & PRINCESS ROAD – REQUEST FOR PARKING CONTROLS
LEAD OFFICER:	Jo Negrini, Chief Executive and Executive Director of Place
CABINET MEMBER:	Councillor Stuart King, Cabinet Member for Transport and Environment
WARDS:	Addiscombe and Selhurst
CORPORATE PRIORITY/POLICY CONTEXT:	
<p>This report is in accordance with objectives to improve the safety and reduce obstructive parking on the Borough’s roads as detailed in:</p> <ul style="list-style-type: none"> • Croydon Local Plan – Nov 2015 • Local Implementation Plan 2; 2.8 Transport Objectives • Croydon’s Community Strategy 2013-18; Priority Areas 1, 2 & 3 • Croydon Corporate Plan 2015 – 18 • www.croydonobservatory.org/strategies/ 	
FINANCIAL SUMMARY:	
These proposal can be contained within available budget	
FORWARD PLAN KEY DECISION REFERENCE NO.: Not a Key Decision	

1. RECOMMENDATIONS

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

- 1.1 Consider a petition from residents of Exeter Road requesting a residents parking scheme and consult residents in Exeter Road, Rymer Road, Edward Road, Vincent Road, Leicester Road, Morland Avenue, Dartnell Road, Brampton Road, Dominion Road, Laurier Road, Bredon Road, Kemerton Road, Jesmond Road, Fullerton Road, Morland Road (CPZ boundary to Jesmond Road), Burnham Gardens, Amberley Grove and Gordon Crescent on a possible extension of the Croydon Controlled Parking Zone (East Outer Permit Zone) with shared-use Permit / Pay &

Display bays currently operating 9am to 5pm, Monday to Saturday.

- 1.2 Consider a petition from residents of Boulogne Road and Princess Road requesting Permit Parking and consult residents in Boulogne Road, Princess Road, Grace Road, Henderson Road, Amersham Road, Mayo Road, Northbrook Road, Pawsons Road, Lion Road, Queens Road, Windmill Grove, Tirrell Road, Windmill Road, St Saviour's Road, Greenwood Road, Elmwood Road and Hartley Road on a possible extension of the Croydon Controlled Parking Zone (North Permit Zone) with shared-use Permit / Pay & Display bays currently operating 9am to 5pm, Monday to Saturday.
- 1.3 Note that in accordance with the Leaders' delegation, decision reference 20/16/LR that the results of the consultations on parking controls in the above two areas will be reported to the Executive Director Place in order for them to make a decision regarding next steps.
- 1.4 Note that the Highways Improvement Manager, Streets Directorate, will inform the instigator of the petitions of these decisions.

2. EXECUTIVE SUMMARY

- 2.1 This report considers petitions received from residents of Exeter Road, Boulogne Road and Princess Road requesting residents parking schemes and recommends informally consulting residents of these roads and the surrounding area on possible extensions to the Croydon Controlled Parking Zone – East Outer and North Permit Zones.

3. DETAIL

Exeter Road – Request for residents' parking

- 3.1 A pro-forma type petition signed by 25 households of Exeter Road has been received via Gavin Barwell MP. The petition is titled 'Exeter Road Residents Parking'.

The petition states:

'Fed up with not being able to park near your house? Having to park your car outside Exeter Road and wondering if it is safe? Fed up with commuters taking up car parking spaces that should be residents?

Over the last few years parking has become increasingly worse. You think that parking is bad now wait until the new flats and housing developments in the area are finished. Huge amounts of flats are being built with some but not enough parking. Residents in adjacent roads are fed up with the parking problem too, if one of these roads gets the go ahead for residential parking we will struggle even more as it will force commuters onto our road. It is not far off getting to the point where we can no longer park down our road.

If you are looking for a success story about how beneficial residential parking can be you don't need to look very far. Alexandra Road had huge problems with commuters and the like but since they have introduced residential parking residents are much

happier because they park without any of the problems they had before.

Please fill in to show if you are for or against residential parking in Exeter Road, once completed please post to ** Exeter Road. Thank you.'

Name(s)	House number	Yes/No

3.2 There are 98 households in Exeter Road plus two in adjoining Tiverton Close. Twenty five responses were received of which 20 (80%) indicated that they were in favour of a residents parking scheme and five (20%) against.

3.3 It is proposed that residents and businesses in the area outlined in Plan No. PD – 317a should be informally consulted to determine support for parking controls. The East Outer Permit Zone was extended into nearby Davidson Road early in 2016 from the Controlled Parking Zone boundary by Stretton Road to the junction with Brampton Road.

3.4 Introducing parking controls in only Exeter Road is likely to simply result to the parking being displaced to surrounding roads therefore it is proposed to also include Rymer Road, Edward Road, Vincent Road, Leicester Road, Morland Avenue, Dartnell Road, Brampton Road, Dominion Road, Laurier Road, Bredon Road, Kemerton Road, Jesmond Road, Fullerton Road, Morland Road (CPZ boundary to Jesmond Road), Burnham Gardens, Amberley Grove and Gordon Crescent.

3.5 The existing Croydon CPZ outer zones operate between 9am and 5pm, Monday to Saturday and this controlled period has been in existence since the permit schemes were introduced in the early to mid-1990s aimed at helping residents and businesses experiencing parking issues from commuters and shoppers during the daytime.

3.6 With the ever increasing levels of car ownership residents in some areas within the zones are experiencing evening and weekend parking issues often caused by new residential developments where there is limited off-street parking for residents, typically one space for three households. There is an existing pilot study in Midhurst Road and Fairholme Road in the North Permit Zone where controls were increased to an 8am to 8pm, Monday to Sunday operation in December 2015 which has seen benefits for residents. The aim is that addresses within the remaining North Permit Zone (and potentially other Croydon CPZ outer zones) be informally consulted on a possible extension of the controls to 8am to 8pm throughout the week.

3.7 It is therefore proposed that residents in the proposed consultation area should be given the opportunity to vote for either extension of the existing controls with 9am to 5pm, Monday to Saturday operation or 8am to 8pm, throughout the week controls.

Boulogne Road and Princess Road – Request for residents’ parking

3.8 A petition signed by 101 residents of Boulogne Road and Enmore Avenue has been received. A covering letter with the petition states:

‘As a resident of Boulogne Road who is frustrated by the local garage using our street as a storage yard and dumping ground for vehicles, I request that you make

our street parking permit only. We consider this to be the only viable solution to the current problem and request that you process our request swiftly'

- 3.9 Boulogne Road and Princess Road are close to the Croydon Controlled Parking, Zone East Outer Zone and due to the nature of the roads with terrace houses and small frontages parking demand is very high. In Princess Road the cemetery on one side of the road attracts commercial vehicles parking as can be witnessed by the number of parked vans.
- 3.10 Approximately half the length of Windmill Road is within the Croydon CPZ which results in parking stress in the remaining unrestricted section of the road and the surrounding area.
- 3.11 Introducing parking controls in only Boulogne Road and Princess Road is likely to simply result to the parking being displaced to surrounding roads, therefore it is proposed to also include Grace Road, Henderson Road, Amersham Road, Mayo Road, Northbrook Road, Pawsons Road, Lion Road, Queens Road, Windmill Grove, Tirrell Road, Windmill Road, St Saviour's Road, Greenwood Road, Elmwood Road and Hartley Road on a possible extension of the Croydon Controlled Parking Zone (North Permit Zone) with shared-use Permit / Pay & Display bays currently operating 9am to 5pm, Monday to Saturday. The consultation area is shown in Plan No. PD – 317b.
- 3.12 As with the consultation proposed for the Exeter Road area it is proposed to include the option of 8am to 8pm throughout the week controls to determine the support for a parking scheme that includes part of the evening and Sundays.

4 CONSULTATION

- 4.1 The purpose of this report is to consider petitions from residents of Exeter Road, Boulogne Road and Princess Road requesting permit schemes.
- 4.2 It is proposed to informally consult residents and businesses of Exeter Road, Rymer Road, Edward Road, Vincent Road, Leicester Road, Morland Avenue, Dartnell Road, Brampton Road, Dominion Road, Laurier Road, Bredon Road, Kemerton Road, Jesmond Road, Fullerton Road, Morland Road (CPZ boundary to Jesmond Road), Burnham Gardens, Amberley Grove and Gordon Crescent on a possible extension of the Croydon Controlled Parking Zone (East Outer Permit Zone) with shared-use Permit / Pay & Display bays currently operating 9am to 5pm, Monday to Saturday.
- 4.3 It is also proposed to informally consult residents and businesses of Boulogne Road, Princess Road, Grace Road, Henderson Road, Amersham Road, Mayo Road, Northbrook Road, Pawsons Road, Lion Road, Queens Road, Windmill Grove, Tirrell Road, Windmill Road, St Saviour's Road, Greenwood Road, Elmwood Road and Hartley Road on a possible extension of the Croydon Controlled Parking Zone (North Permit Zone) with shared-use Permit / Pay & Display bays currently operating 9am to 5pm, Monday to Saturday.

- 4.4 Results of the informal consultation in the above areas will be considered either through delegated authorisation via the Director of Streets and Executive Director of Place or reported to a future Traffic Management Advisory Committee meeting and a decision will be made on whether or not controls should be extended to the whole or part of the areas subject to formal consultation.
- 4.5 Formal consultation takes place in the form of Public Notices published in the London Gazette and a local paper (Croydon Guardian). Although it is not a legal requirement this Council also fixes street notices to lamp columns in the vicinity of the proposed scheme and writes to occupiers who are directly affected to inform as many people as possible of the proposals.
- 4.6 Official bodies such as the Fire Brigade, Cycling UK (formally known as Cyclists' Touring Club), The Pedestrian Association, Age UK, The Owner Drivers' Society, The Confederation of Passenger Transport and bus operators are consulted under the terms of the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. Additional bodies, up to 27 in total, are consulted depending on the relevance of the proposals.
- 4.7 Once the notices have been published the public has 21 days to comment or object to the proposals. If no relevant objections are received, subject to agreement to the delegated authority sought by the recommendations, the Traffic Management Order is then made. Any relevant objections received will be reported back to this Committee for a recommendation as to whether the scheme should be introduced as originally proposed, amended or abandoned. The objectors are then informed of the decision.

5 FINANCIAL CONSIDERATIONS

- 5.1 There is a revenue budget of £50k for CPZ undertakings and £50k for Footway Parking and Disabled Bays, from which these commitments if approved will be funded. Attached to the papers of this meeting is a summary of the overall financial impact of this and other applications for approval at this meeting. If all applications were approved there would remain £51k un-allocated to be utilised in 2016/2017 this is taking into account £13k that was committed in 2015/2016 against the 2016/2017 financial years spend.

5.2 Revenue and Capital consequences of report recommendations

	Current Financial Year	M.T.F.S – 3 year Forecast		
	2016/17	2017/18	2018/19	2019/20
	£'000	£'000	£'000	£'000
<u>Revenue Budget available</u>				
Expenditure	62	100	100	100
Income	0	0	0	0
<u>Effect of Decision from Report</u>				
Expenditure	4	0	0	0
Income	0	0	0	0
Remaining Budget	58	100	100	100
<u>Capital Budget available</u>				
Expenditure	0	0	0	0
<u>Effect of Decision from report</u>				
Expenditure	0	0	0	0
Remaining Budget	0	0	0	0

5.3 The effect of the decision

5.3.1 The cost of informally consulting residents for possible parking controls in the Exeter Road and Boulogne Road areas as outlined in this report is estimated at £4,400.

5.3.2 These costs can be contained within the available revenue budgets for 2016/17.

5.3 Risks

5.3.1 Whilst there is a risk that the final cost will exceed the estimate, this work is allowed for in the current budgets for 2016/17.

5.4 Options

5.4.1 Not consulting residents in these areas would not appease petitioners who may feel that the Council is not taking their concerns seriously.

5.5 Savings/future efficiencies

- 5.5.1 The current method of introducing parking restrictions is very efficient with the design and legal (Traffic Management Order) work being carried out within the department.
- 5.5.2 The marking of the bays and the supply and installation of signs and posts is carried out using the new Highways Contract and the rates are lower than if the schemes were introduced under separate contractual arrangements.
- 5.5.3 Approved by: Zulf Darr, Interim Head of Finance, Place and Resources.

6. COMMENTS OF THE COUNCIL SOLICITOR AND MONITORING OFFICER

- 6.1 The Solicitor to the Council comments that Sections 6, 124 and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984 (as amended) provide powers to introduce and implement Traffic Management Orders. In exercising this power, section 122 of the Act imposes a duty on the Council (so far as is 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 matters such as the effect on the amenities of any locality affected.
- 6.2 The Council must 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.
- 6.3 Approved for and on behalf of Jacqueline Harris-Baker, Acting Council Solicitor and Acting Monitoring Officer.

7. HUMAN RESOURCES IMPACT

- 7.1 There are no human resources implications arising from this report.
- 7.2 Approved by: Adrian Prescod, HR Business Partner, for and on behalf of Director of Human Resources, Chief Executive Department.

8. EQUALITIES IMPACT

- 8.1 An initial Equalities Impact Assessment (EqIA) has been carried out and it is considered that a Full EqIA is not required.

9. ENVIRONMENTAL IMPACT

- 9.1 There are no environmental impact considerations arising from this report.

10. CRIME AND DISORDER REDUCTION IMPACT

10.1 There are no crime and disorder reduction impacts arising from this report.

11. REASONS FOR RECOMMENDATIONS

11.1 The recommendations are to consult residents in the Exeter Road and Boulogne Road areas to determine the level of support for parking controls.

12. OPTIONS CONSIDERED AND REJECTED

12.1 The alternative options would be not to consult residents in the Exeter Road and Boulogne Road areas. However, this is unlikely to be acceptable by residents in the areas where consultation on possible parking controls is recommended as they are likely to feel that their petitions have been ignored by the Council.

REPORT AUTHOR / CONTACT OFFICER:

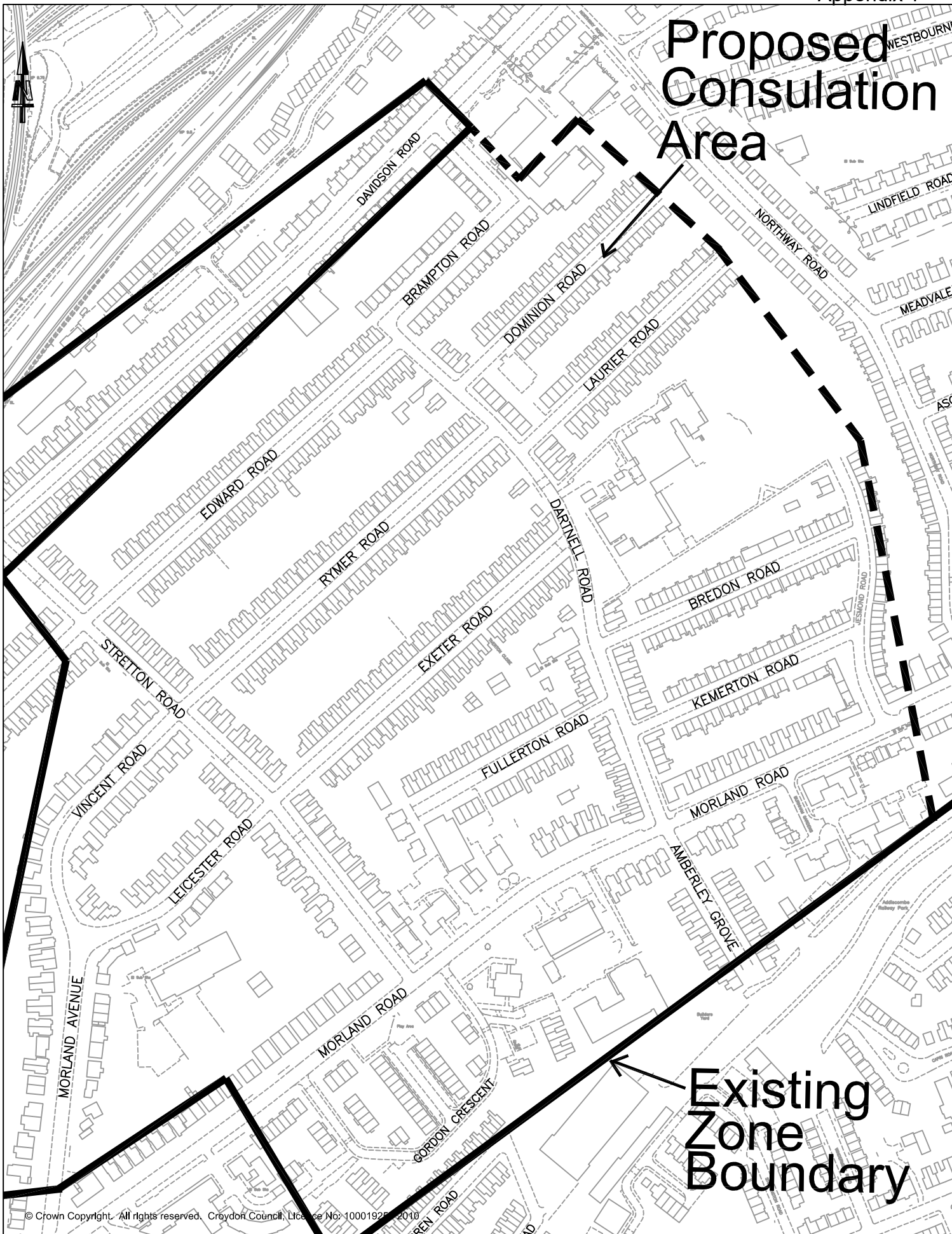
David Wakeling, Parking Design
Manager, Highway Improvement
020 8726 6000 (Ext. 88229)

BACKGROUND DOCUMENTS:

None

APPENDICES:

Appendix 1 – Map of the proposed
consultation area – Exeter Road
Appendix 2 – Map of the proposed
consultation area – Boulogne Road and
Princess Road



**Proposed
Consultation
Area**

**Existing
Zone
Boundary**

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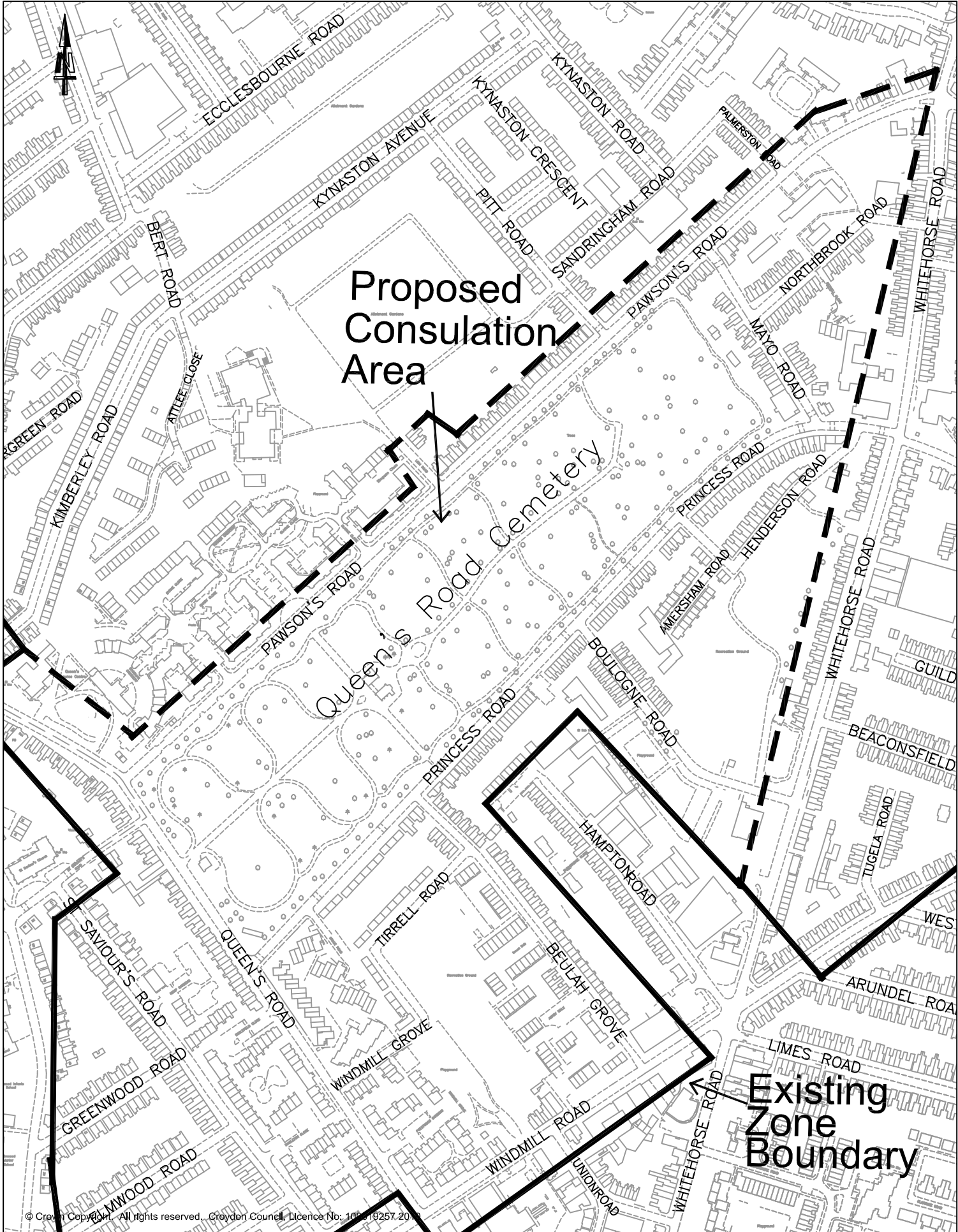
Proposed Consultation Area

CROYDON COUNCIL

DEVELOPMENT AND ENVIRONMENT DEPARTMENT
PO BOX No. 1462
CROYDON
CR9 1WX

INFRASTRUCTURE - TRAFFIC DESIGN
Scale: NTS
Date: September 2016
Page 15 of 128
Checked: DJW
Rev: 00
Drawing Ref: PD-317a

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Proposed Consultation Area

CROYDON COUNCIL

DEVELOPMENT AND ENVIRONMENT DEPARTMENT
 PO BOX No. 1462
 CROYDON
 CR9 1WX

INFRASTRUCTURE - TRAFFIC DESIGN
 Scale: NTS Drawn PT Checked DJW Rev. 00
 Date: September 2015 Drawing Ref. PD-317b

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Croydon Council

For general release

REPORT TO:	TRAFFIC MANAGEMENT ADVISORY COMMITTEE 5 October 2016
AGENDA ITEM:	7
SUBJECT:	SUTHERLAND ROAD AREA – OBJECTIONS TO THE PROPOSED EXTENSION OF THE CROYDON CPZ (NORTH PERMIT ZONE)
LEAD OFFICER:	Jo Negrini, Chief Executive and Executive Director of Place
CABINET MEMBER:	Councillor Stuart King, Cabinet Member for Transport and Environment
WARDS:	Broad Green and West Thornton
CORPORATE PRIORITY/POLICY CONTEXT: This report is in line with objectives to improve the safety and reduce obstructive parking on the Borough's roads as detailed in: <ul style="list-style-type: none">• The Local Implementation Plan; 3.6 Croydon Transport policies• Croydon's Community Strategy; Priority Areas 1, 3, 4 and 6• The Croydon Plan 2nd Deposit; T4, T7, T35, T36, T42 and T43.• Croydon Corporate Plan 2015 – 18• www.croydonobservatory.org/strategies/	
FINANCIAL IMPACT: These proposals can be contained within available budget.	
FORWARD PLAN KEY DECISION REFERENCE NO.: Not a Key Decision	
1. RECOMMENDATIONS That the Traffic Management Advisory Committee recommend to the Cabinet Member for Transport and Environment that they: 1.1 Consider the objections and letters of support received to extending the existing Croydon Controlled Parking Zone (North Permit Area) to Greenside Road, Pemdevon Road, Sutherland Road, Wentworth Road, Priory Road, Canterbury Road, Wortley Road, Donald Road and Lancing Road with a combination of Shared-Use Permit/Pay & Display (8 hour maximum stay) and single yellow lines operating 9am to 5pm, Monday to Saturday.	

- 1.2 Agree for the reasons detailed in this report to extend the Croydon Controlled Parking Zone into the above roads as shown on plans PD 312a to j for the reasons as set out in this report.
- 1.3 Inform the objectors and supporters of the above decision.

2. EXECUTIVE SUMMARY

- 2.1 The purpose of this report is to consider objections received from the public following the formal consultation process on a proposal to extend the existing Croydon Controlled Parking Zone (North Permit Area) to Greenside Road, Pemdevon Road, Sutherland Road, Wentworth Road, Priory Road, Canterbury Road, Wortley Road, Donald Road and Lancing Road with a combination of Shared-Use Permit/Pay & Display machines (8 hour maximum stay) and single yellow lines operating from 9am to 5pm, Monday to Saturday.

3. OBJECTIONS AND RESPONSES

Objection 1

- 3.1 A resident of Greenside Road has objected on the grounds that the costs outweigh the inconvenience of finding a parking space

Response – While some residents may not consider the scheme to be value for money, in the initial informal consultation, 84% of respondents from Greenside Road voted in favour of the scheme. The cost of the first permit (£80) is low in comparison with the overall cost of running a car.

Objection 2

- 3.2 A resident of Sutherland Road is objection on the grounds that:
 - The permit cost is an extra tax on residents
 - They should have the freedom to park on most roads
 - Sutherland Road is not near a shopping centre
 - They think that controls should not apply on Saturday
 - They didn't receive the consultation documents during the informal consultation period

- 3.3 **Response** – Parking schemes such as this proposal have to be self-financing, the fees charged for permits and pay and display tickets funds the enforcement of the zones. Applying a charge for permits is a way of managing supply and demand. The proposed scheme will not stop the objector from parking on a particular road; they will still be free to do so but will have to pay the relevant fee if the scheme proceeds. Sutherland Road is approximately 10 to 15 minutes walk from the Town Centre and closer to Croydon University Hospital and West Croydon station and commuters park in this area on a daily basis. This objector is unhappy with the controls applying on a Saturday, however a large majority (77% of respondents from their street) voted in favour of this scheme. A response was received from this objector to the informal consultation – they did receive the consultation documents.

Objection 3

3.4 An objection has been received from a commuter who works on Canterbury Road on the grounds that:

- It will be financially difficult for them if the scheme goes ahead
- Local businesses are not the problem

Response – If this scheme goes ahead commuters who do not wish to pay and display have the option of parking in neighbouring uncontrolled roads. In addition this area is well serviced by public transport (both trains and busses). Businesses have the option of purchasing parking permits for their vehicles (albeit at a higher cost and limited to 2 permits per business) so they will not be prevented from parking on the road.

Objection 4

3.5 An objection has been received from a resident of Lancing Road on the grounds that:

- They do not want to pay to park their car
- They are not running a business – only businesses should be charged
- People are struggling financially
- They didn't know about the scheme
- Residents should be allowed to park for free regardless of the number of cars in their household

Response – Schemes such as this have to be self-financing as there is no subsidy from the Council tax and as such there needs to be a fee for permits. Charging residents for permits as well as businesses is a way of managing supply and demand. Many households have more than one car while the available on-street parking does not increase. The fee for the first permit is only £80, low when compared to the overall cost of running a car. Consultation documents were delivered to all residents and businesses within this area.

Objection 5

3.6 An objection has been received from a resident of Donald Road on the grounds that:

- The cost is too much with no guarantee of a parking space
- It will move parking problems to other roads in the area

Response – The cost of one permit is low when compared with the overall cost of running a car, particularly in Greater London. There is an inevitable problem of shifting commuter parking to other uncontrolled streets although this is reduced by allowing Pay & Display users such as commuters to park throughout the day. No parking scheme can guarantee a parking space in a particular road; however, experience has shown that residents have a far improved chance of parking near their homes after a CPZ has been introduced than beforehand.

Objection 6

3.7 A resident of Wortley Road has objected on the grounds that

- They cannot see the advantage of introducing a CPZ

Response – CPZs have been introduced in neighbouring roads in recent years (Fairholme Road and Dennett Road) and residents have expressed satisfaction with the new parking arrangements with increased opportunities in parking close to their homes. Residents who are unsure of the benefits would be advised to visit controlled roads during hours of operation to observe the difference between controlled roads and uncontrolled roads.

Objection 7

3.8 A resident of Wortley Road has objected on the grounds that:

- There will not be enough bays available
- They don't understand why there is a charge applied for permits
- Each house should be given a bay
- Even if they get a permit there is no guarantee that they will get a parking space
- They think house prices will drop as a result of the scheme

Response – Currently it is difficult to park on Wortley Road and the surrounding streets during the day. If the scheme were to go ahead residents would be more likely to find a space as evidence suggests that most commuters will choose not to pay and display. All motorists (except for blue badge holders), both permit holders and those who obtain pay and display vouchers have to pay to park in the road. The scheme must be self-financing as there is no subsidy from the Council tax. No motorist is ever guaranteed a parking space on public highway but experience of existing controlled roads shows that residents are more likely to find a space close to their home. Bays operate on a first come first served basis. There is no evidence to suggest that house prices drop as a result of controlled parking.

Objection 8

3.9 A resident of Priory Road has objected on the grounds that:

- They shouldn't have to pay as they pay their Council Tax
- There are no problems parking during the week, only evenings and weekends
- Carers visiting residents on the street will have to pay
- The road is a 'rat-run' and should be made one-way – this is a bigger problem than parked cars

Response – No funding is available from the Council Tax to introduce parking controls and there is a requirement that these schemes are self-financed. Many residents do experience parking problems here (44% of respondents to informal consultation were in favour of the scheme). A carer would have to pay and display like any other commuter or use a visitors' permit if they wished to park on a controlled road during the hours of operation. Experience of nearby Dennett Road where residents petitioned the council for one-way working due to continuous conflict and subsequent road rage incidences was that once parking controls were introduced last year this resulted in more gaps for passing vehicles and there is no longer a need for one-way working.

Objection 9

- 3.10 A resident of Priory Road has objected on the grounds that:
- They do not understand why the scheme is proceeding when most residents were against the scheme at the informal consultation stage
 - They want a one-way system on the street
 - They are not convinced that a CPZ will help the residents of Priory Road
 - Residents shouldn't have to pay to park outside their own houses.
 - People cannot afford the charges
 - Visitors cannot afford the daily charge

Response – Although the results from the informal consultation showed that 44% of residents who responded to the consultation in Priory Road voted in favour, the majority in neighbouring roads were in favour and parking stress would increase considerably if this road remained uncontrolled. A decision was made at the meeting (minute A5/16 refers) to include Priory Road within the formal consultation process. Experience of nearby Dennett Road where residents petitioned the council for one-way working due to continuous conflict and subsequent road rage incidences was that once parking controls were introduced last year this resulted in more gaps for passing vehicles and there is no longer a need for one-way working. Depending on whether this is the case in this road consideration could be given to one-way working at a later date in conjunction with other one-way requests in the Borough. Evidence is available through observation of nearby controlled street of the benefits afforded to residents of CPZs. Permit charges are low when compared to the overall costs of running a car. Visitors who do not wish to pay and display can use visitors' permits or park on an uncontrolled street. The area is also well served by public transport.

Objection 10

- 3.11 A resident of Wortley Road has objected on the grounds that:
- anyone can pay and leave their vehicle all day
 - residents should have priority to park on their roads

Response – It is true anyone may pay and display and park for the entire day. However, anecdotal evidence suggests that this is unlikely in this area and in reality the majority of commuters will not want to pay to park. It is not possible to ensure that residents have a priority over parking spaces. Parking spaces are allocated on a first come first served basis regardless of who is wishing to park there although experience from existing schemes indicates that residents are far more likely to park close to their home within a CPZ than in unrestricted streets.

Objection 11

- 3.12 A business on Canterbury Road is objecting on the grounds that:
- Businesses are getting the blame for parking problems
 - Parking problems are caused by the Council not requiring developers to provide adequate parking at new developments

Response – There has been no suggestion that local businesses are to blame

for the local parking problems. Currently parking is so difficult that many customers may not be able to find available spaces. Introducing controls will most likely free up space to enable customers to park. Many developments now are designed for low car ownership, especially due to the excellent public transport facilities in the area. The Council has no power to prevent residents purchasing more cars than they have space to park.

Objection 12

- 3.13 A business on Boston Road has objected on the grounds that it will adversely affect their business.

Response – If this scheme goes ahead vehicles will still be able to park for free on Boston Road, though there may be some transfer of parking problems from the CPZ. The controlled roads off Boston Road (Donald Road, Lancing, Road and Wortley Road) currently experience parking problems but with controls it is more likely that customers will be able to park.

Objection 13

- 3.14 A resident of Wentworth Road has objected on the grounds that:
- the parking issue is worse in the evenings than during the day
 - the capacity of the road is lower than the residents parking needs
 - new developments need to take parking demand into account
 - the main problem on the road is the inability of vehicles to pass each other
 - a one-way system is needed

Response – A large majority of residents on this street (72% of households that responded) voted in favour of the 9am to 5pm controls. It is proposed to consult residents of the North Permit Zone (including the extension area) on possible 8am to 8pm, throughout the week controls following the current pilot in Fairholme Road and Midhurst Avenue. The road capacity is finite with or without a CPZ. Planners already consider local transport requirements when making decisions on planning applications. With respect to the request for one-way working please see response to Objection 9.

Objection 14

- 3.15 A resident of has objected on the grounds that:
- People who own cars shouldn't be penalised
 - They do not understand why people should have to pay to park
 - There is no guarantee of a parking space
 - Only visitors should have to pay
 - Roads in the surrounding area will experience greater difficulty
 - Parking in their street is tricky but not impossible.

Response – No funding is available from the Council Tax to introduce parking controls and there is a requirement that these schemes are self-financed. Their introduction is not an attempt to penalise drivers but to manage parking where there is parking stress. Motorists are never guaranteed an on-street parking space regardless of whether or not the road is controlled but experience has shown that residents and visitors are far more likely to find a space in controlled

areas. Charging residents for permits and limited the number per household is a way of managing supply and demand. There is an inevitable problem of shifting commuter parking to other uncontrolled streets although this is reduced by allowing Pay & Display users such as commuters to park throughout the day.

Objection 15

3.16 A resident of Wentworth Road has objected on the grounds that:

- They would prefer a one-way street to resolve the current conflict / road rage incidences
- Feel that 9am to 5pm controls will not help the road and are unhappy that there were not given a choice of times at the time of the consultation
- Want long bays instead of individual bays and claim that this is the case in many roads in the Borough

Response – With respect to the request for one-way working please see response to Objection 9. A large majority of residents on this street (72% of households that responded) voted in favour of the 9am to 5pm controls. . In response to the 8am to 8pm, throughout the week request please see response to Objection 13. The Council receives as many requests for individual bays to help regulate parking than it does for unbroken bays allowing residents to park how they wish. Currently individual bays are introduced to indicate paid for parking and unsegregated bays for free parking areas.

Comment 1

3.17 Comments on the proposal were received from a business on London Road, within the existing controlled parking zone. The business is unhappy that they went not consulted and feel that parking is already a problem and that further controls will not help. Their customers find parking such a problem that some are reluctant to visit the Croydon premises. They are not against the principal of parking to park but express concern at the amount of parking available.

Response – Introducing parking controls should free up available spaces during business hours and make it easier for customers of this business, as well as other in the area to park. The maximum possible number of bays will be introduced, single yellow lines will be only be placed over dropped kerbs.

Comment 2

3.18 A resident of Wentworth Road has written requesting a one-way system. They are concerned that a one-way system will not proceed if the CPZ proceeds. They feel that the CPZ will not help the main problems facing the road.

Response – Please see response to Objection 9 in response to the request for one-way working.

Support 1

3.19 A resident of Wentworth Road is supporting parking controls having lived at the address since 1983 and witnessed the dramatic increase in parking in recent years. They feel that 8am to 8pm controls are needed and that one-way working is urgently required. They are aware that prospective home purchasers have

been put off due to the parking problems.

Response – In response to the 8am to 8pm, throughout the week request please see response to Objection 13. With respect to the request for one-way working please see response to Objection 9.

Support 2

- 3.20 Eight households of Priory Road have sent pro-forma type letters fully supporting the proposals but for 8am to 8pm, Monday to Sunday controls rather than the 9am to 5pm, Monday to Saturday proposals. In order to prevent bad parking they have requested individually marked bays.

Response – In response to the 8am to 8pm, throughout the week request please see response to Objection 13. Bays are proposed to be individually marked.

Support 3

- 3.21 A resident of Priory Road supports the scheme but wants 8am to 8pm, Monday to Sunday controls and wants confirmation that residents in the newly built developments that are mainly in London Road will not be eligible for permits.

Response – In response to the 8am to 8pm, throughout the week request please see response to Objection 13. Most new Town Centre residential developments now have a clause within the Section 106 Planning Agreement that prevents residents from obtaining permits. In addition the Articles for Traffic Management Orders for all on-street Permit / Shared-use bays have a statement that the Council 'may' issue permits to residents within a Permit Zone to give some flexibility even for those earlier developments that have no section 106 permit restriction.

Support 4

- 3.22 A resident of Lancing Road supports the proposals and emphasises that two nearby garages cause most of the parking problems with vehicles being left long-term in the area. Their preference would be for 8am to 8pm, Monday to Sunday controls.

Response – Although businesses can purchase permits these are limited to a maximum of 2 per business within the Croydon CPZ so vehicles that are left on the highway during the controlled period would be required to Pay & Display. In response to the 8am to 8pm, throughout the week request please see response to Objection 13.

- 3.23 It is recognised that parking in this area is at a premium due to the close proximity of the Croydon Controlled Parking Zone, Croydon University Hospital, the number of large residential developments in the area and the Town Centre including West Croydon Station. The majority of residents in the area voted in favour of parking controls when consulted early in the year and although 15 objections have been received this can be considered a low number bearing in mind the number of households in this area which is close to 1200 over 9 roads. In view of the above it is proposed to extend the existing zone into this area.

4 CONSULTATION

- 4.1 The purpose of this report is to consider comments and objections from the public following the giving of public notice of the proposals. Once the notices were published, the public had up to 21 days to respond.
- 4.2 The legal process requires that formal consultation takes place in the form of Public Notices published in the London Gazette and a local paper (Croydon Guardian). Although it is not a legal requirement, this Council also fixes notices to lamp columns in the vicinity of the proposed schemes to inform as many people as possible of the proposals.
- 4.3 Organisations such as the Fire Brigade, the Cycling Council for Great Britain, The Pedestrian Association, Age UK and bus operators are consulted separately at the same time as the public notice. Other organisations are also consulted, depending on the relevance of the proposal. No comments were received from any of these organisations.

5. FINANCIAL CONSIDERATIONS

- 5.1 The capital spend is to come out of the LIP (local Implementation Plan) budget allocation of £30k for the current financial year. Attached to the papers of this meeting is a summary of the overall financial impact of this and other applications for approval at this meeting.

5.2 Revenue and Capital consequences of report recommendations

	Current Financial Year	M.T.F.S – 3 year Forecast		
	2016/17	2017/18	2018/19	2019/20
	£'000	£'000	£'000	£'000
<u>Revenue Budget available</u>				
Expenditure	0	0	0	0
Income	0	0	0	0
<u>Effect of Decision from Report</u>				
Expenditure	0	0	0	0
Income	0	0	0	0
Remaining Budget	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Capital Budget available</u>				
Expenditure	30	70	0	0
<u>Effect of Decision from report</u>				
Expenditure	30	40	0	0
Remaining Budget	<u>0</u>	<u>30</u>	<u>0</u>	<u>0</u>

5.3 The effect of the decision

5.3.1 The cost of extending controlled parking into the Sutherland Road / Canterbury Road area is estimated at £70,000. This includes the provision of 22 Pay & Display machines, signs and lines and a contribution towards the legal costs.

5.3.2 This cost can be contained within the available capital budget for Controlled Parking Schemes under the Local Implementation Plan (LIP) projects for 2016/17 and 2017/18.

5.4 Risks

5.4.1 There is a risk that the final cost will exceed the estimate. However, this work is allowed for in the current budget.

- 5.4.2 If controlled parking is introduced future income will be generated from Pay & Display takings and permit sales, together with enforcement of these controls through vehicle removals and Penalty Charge Notices. CPZ schemes have proven to be self-financing usually within 4 years of introduction.

6 Options

- 6.1 The alternative option is not to introduce the parking controls. This could have a detrimental effect on residents in that they would continue to suffer with parking issues in relation to obstruction, road safety and traffic flow problems.

7 Savings/ future efficiencies

- 7.1 The current method of introducing parking controls is very efficient with the design and legal work being carried out within the department. The marking of the bays and the supply and installation of signs and posts is carried out using the new Highways Contract and the rates are lower than if the schemes were introduced under separate contractual arrangements.

- 7.2 Approved by: Zulf Darr, Interim Head of Finance, Place and Resources.

8 COMMENTS OF COUNCIL SOLICITOR AND MONITORING OFFICER

- 8.1 The Solicitor to the Council comments that Sections 6, 124 and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984 (as amended) provide powers to introduce and implement Traffic Management Orders. In exercising this power, section 122 of the Act imposes a duty on the Council (so far as is 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 matters such as the effect on the amenities of any locality affected.

- 8.2 The Council must 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 and responded to in this report.

- 8.3 Approved for and on behalf of Jacqueline Harris-Baker, Acting Council Solicitor and Acting Monitoring Officer.

9. HUMAN RESOURCES IMPACT

- 9.1 There are no human resources implications arising from this report.

- 9.2 Approved by: Adrian Prescod, HR Business Partner, for and on behalf of Director of Human Resources, Chief Executive Department.

10. EQUALITIES IMPACT

- 10.1 An initial Equalities Impact Assessment (EqIA) has been carried out and it is considered that a Full EqIA is not required.

11. ENVIRONMENTAL IMPACT

- 11.1 Narrow 50mm wide lines can be used in environmentally sensitive and conservation areas. This area is not a conservation area.

12. CRIME AND DISORDER REDUCTION IMPACT

- 12.1 Waiting restrictions at junctions are normally placed at a minimum of 10 metres from the junction, which is the distance up to which the Police can place Fixed Penalty Charge Notices to offending vehicles regardless of any restrictions on the ground.

13. REASONS FOR RECOMMENDATIONS

- 13.1 The recommendation is to extend the existing Controlled Parking Zone into Greenside Road, Pemdevon Road, Sutherland Road, Wentworth Road, Priory Road, Canterbury Road, Wortley Road, Donald Road and Lancing Road, since the majority of residents in this area voted in favour of parking controls and a parking scheme should ensure adequate parking facilities for residents, visitors and for local businesses.
- 13.2 Also the introduction of marked bays away from driveways, junctions and other locations where parking causes problems with yellow line waiting restrictions in between will ensure the expeditious, convenient and safe movement of all road users.

14. OPTIONS CONSIDERED AND REJECTED

- 14.1 An alternative option is not to introduce the parking controls. This could have a detrimental effect on residents in that they would continue to suffer with parking issues in relation to obstruction, road safety and traffic flow problems.
- 14.2 Consideration was given to not introducing parking controls in these roads due to the petition received. However, experience has shown that some residents can feel pressurised when confronted with a petitioner and that the informal questionnaire should be used as a better indication on whether there is support for parking controls.

REPORT AUTHOR: Teresa O'Regan – Traffic Engineer
Infrastructure Parking Design, 020 8762 6000
(Ext. 88260)

CONTACT OFFICER: David Wakeling, Parking Design Manager,
Infrastructure Parking Design, 020 8726 6000
(Ext. 88229)

BACKGROUND PAPERS: None.

APPENDICES: Appendix 1 – Map of the Sutherland Road Area
PD 312a

Appendix 2 – Map of the Sutherland Road Area
PD 312b

Appendix 3 – Map of the Sutherland Road Area
PD 312c

Appendix 4 – Map of the Sutherland Road Area
PD 312d

Appendix 5 – Map of the Sutherland Road Area
PD 312e

Appendix 6 – Map of the Sutherland Road Area
PD 312f

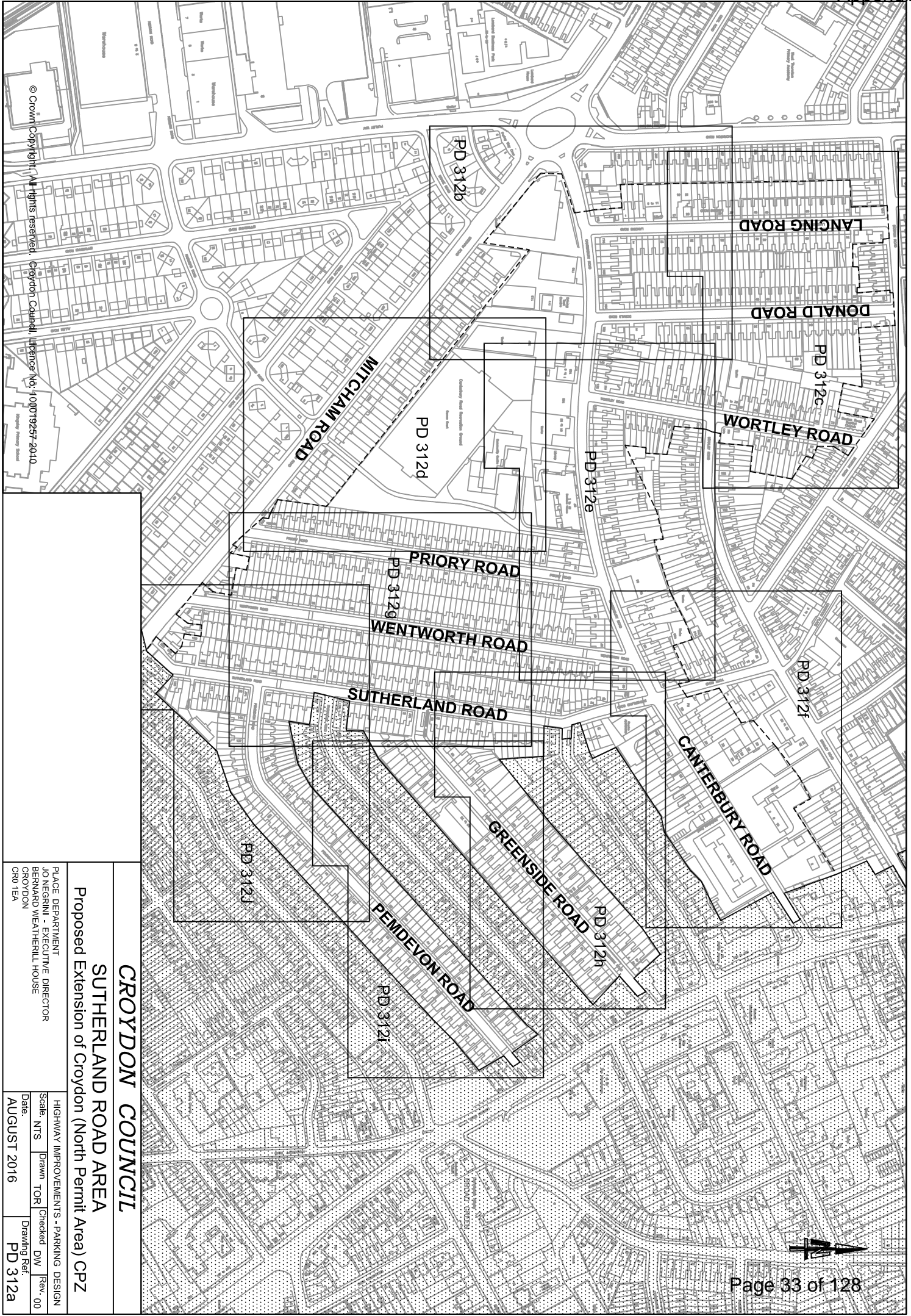
Appendix 7 – Map of the Sutherland Road Area
PD 312g

Appendix 8 – Map of the Sutherland Road Area
PD 312h

Appendix 9 – Map of the Sutherland Road Area
PD 312i

Appendix 10 – Map of the Sutherland Road
Area
PD 312j

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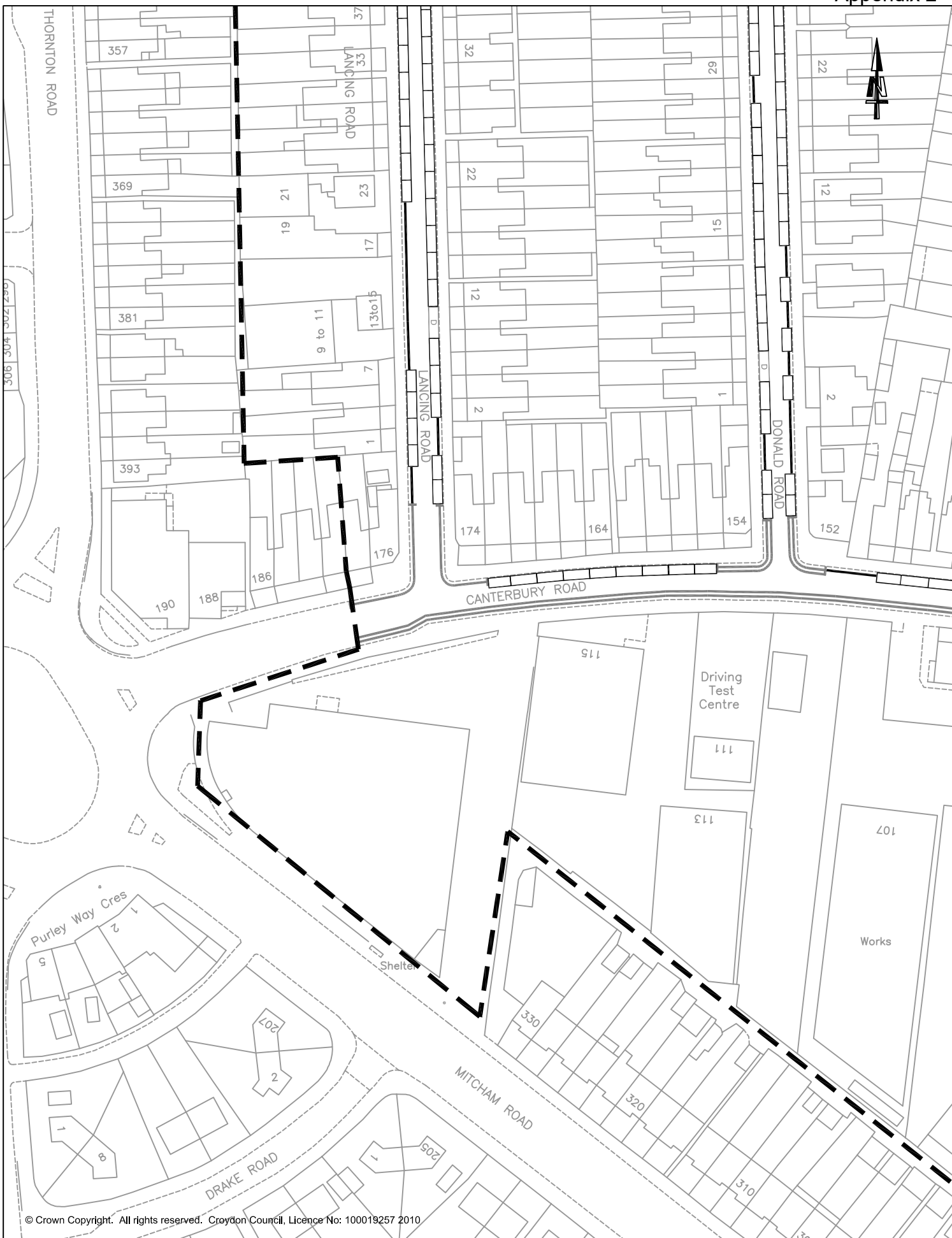


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


CROYDON COUNCIL SUTHERLAND ROAD AREA Proposed Extension of Croydon (North Permit Area) CPZ	
PLACE DEPARTMENT JO NEGRINI - EXECUTIVE DIRECTOR BERNARD WEATHERILL HOUSE CROYDON CR0 1EA	HIGHWAY IMPROVEMENTS - PARKING DESIGN Scale: NTS Date: AUGUST 2016
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-  Existing Controlled Parking Zone Boundary
-  Consultation Boundary
-  Existing Disabled Parking Bay
-  Existing Loading Bay
-  Proposed Parking Bays
-  Proposed Parking Restrictions
-  Existing Parking Restrictions

CROYDON COUNCIL

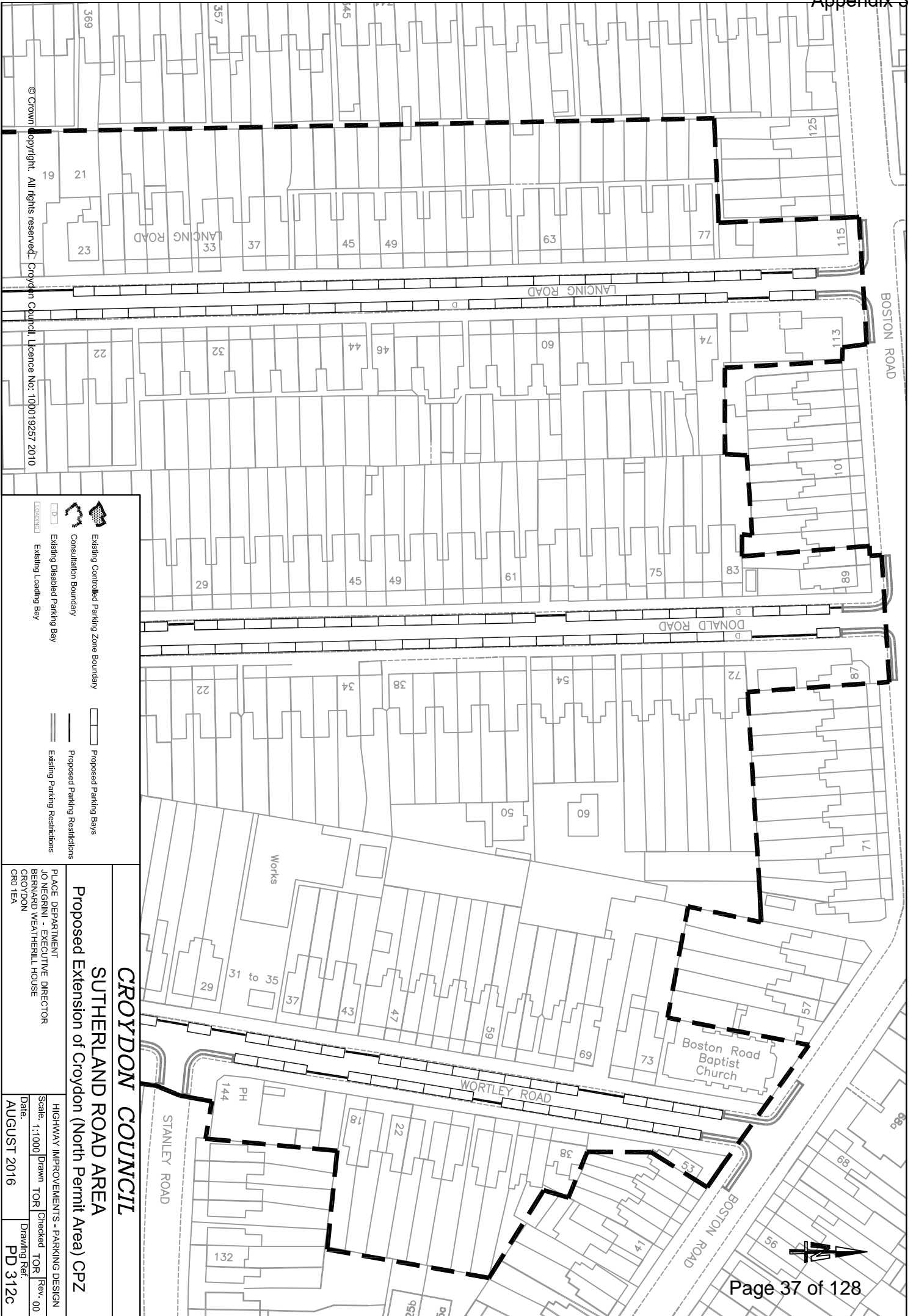
SUTHERLAND ROAD AREA Proposed Extension of Croydon (North Permit Area) CPZ

PLACE DEPARTMENT
JO NEGRINI - EXECUTIVE DIRECTOR
BERNARD WEATHERILL HOUSE
CROYDON
CR0 1EA

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	Existing Controlled Parking Zone Boundary
	Consultation Boundary
	Existing Disabled Parking Bay
	Existing Loading Bay
	Proposed Parking Bays
	Proposed Parking Restrictions

CROYDON COUNCIL

SUTHERLAND ROAD AREA

Proposed Extension of Croydon (North Permit Area) CPZ

PLACE DEPARTMENT
 JO NEGRINI - EXECUTIVE DIRECTOR
 BERNARD WEATHERILL HOUSE
 CROYDON
 CR0 1EA

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	Existing Disabled Parking Bay		Existing Parking Restrictions
	Existing Loading Bay		

CROYDON COUNCIL

SUTHERLAND ROAD AREA

Proposed Extension of Croydon (North Permit Area) CPZ

PLACE DEPARTMENT JO NEGRINI - EXECUTIVE DIRECTOR BERNARD WEATHERILL HOUSE CROYDON CR0 1EA	HIGHWAY IMPROVEMENTS - PARKING DESIGN Scale: 1:1000 Date: AUGUST 2016 Drawing Ref. PD 312d
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	Existing Parking Restrictions

CROYDON COUNCIL

SUTHERLAND ROAD AREA

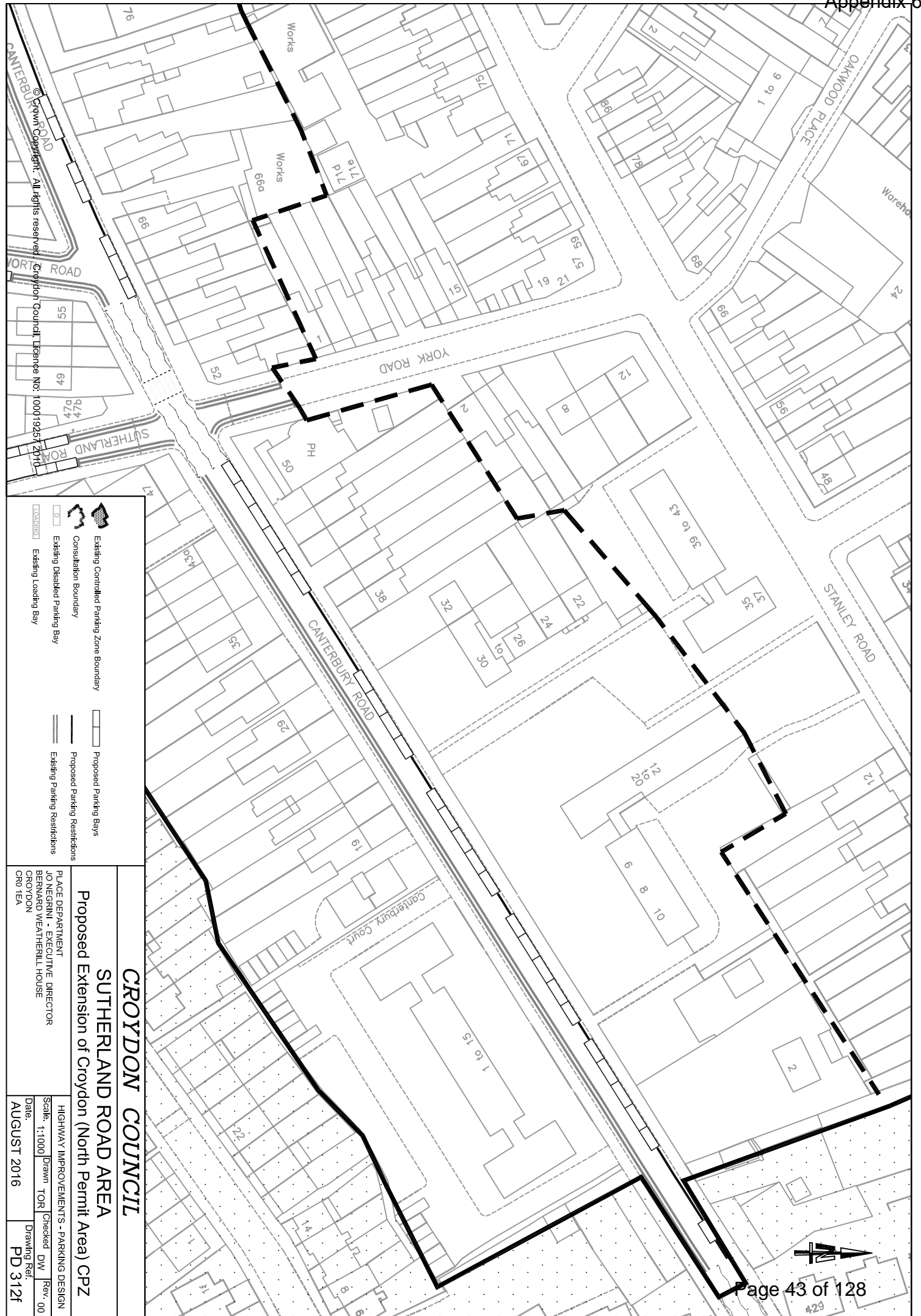
Proposed Extension of Croydon (North Permit Area) CPZ

PLACE DEPARTMENT
JO NEGRINI - EXECUTIVE DIRECTOR
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	Existing Loading Bay
	Proposed Parking Bays
	Proposed Parking Restrictions
	Existing Parking Restrictions

CROYDON COUNCIL

SUTHERLAND ROAD AREA

Proposed Extension of Croydon (North Permit Area) CPZ

PLACE DEPARTMENT
 JO NEGRINI - EXECUTIVE DIRECTOR
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CROYDON COUNCIL

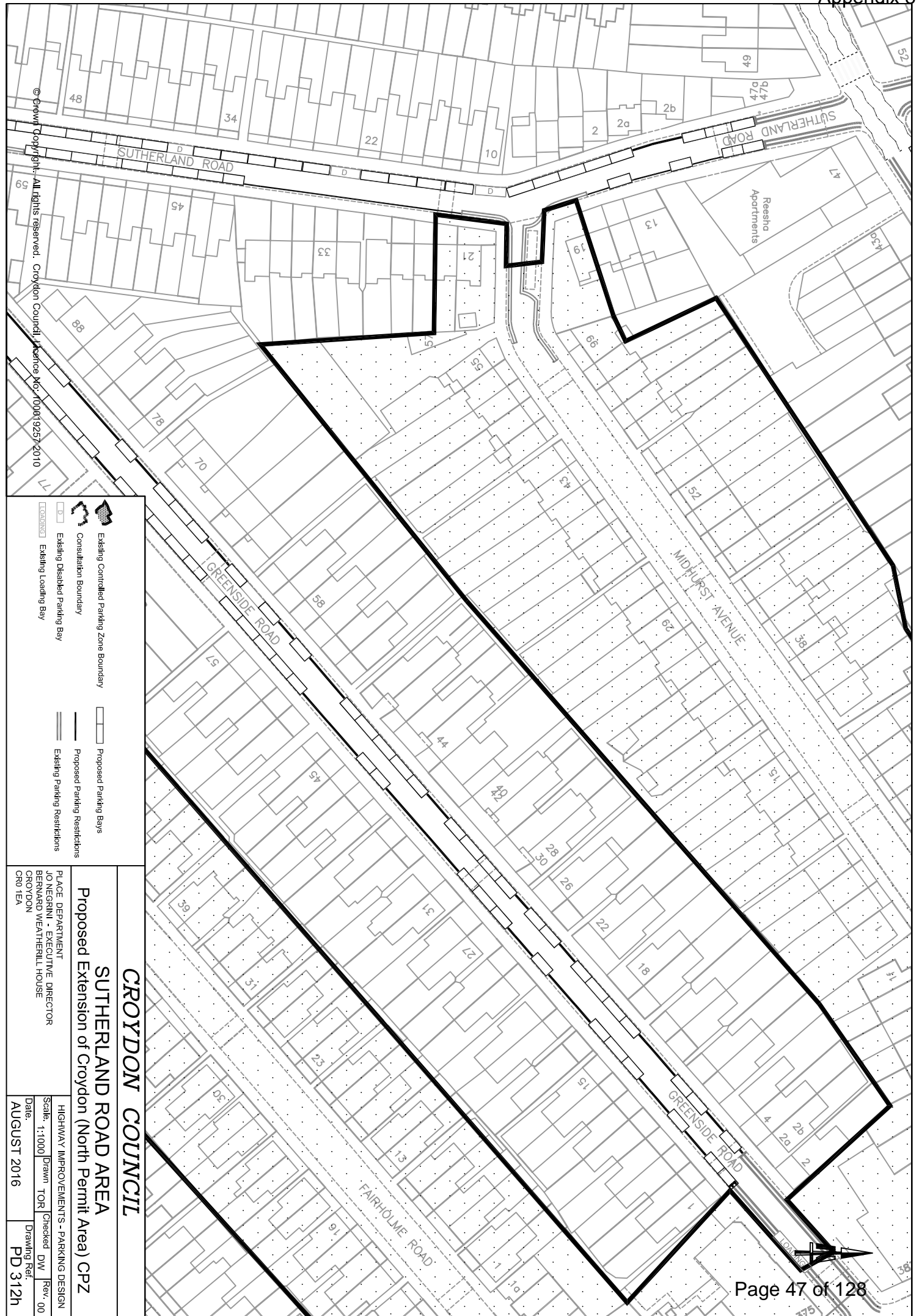
SUTHERLAND ROAD AREA

Proposed Extension of Croydon (North Permit Area) CPZ








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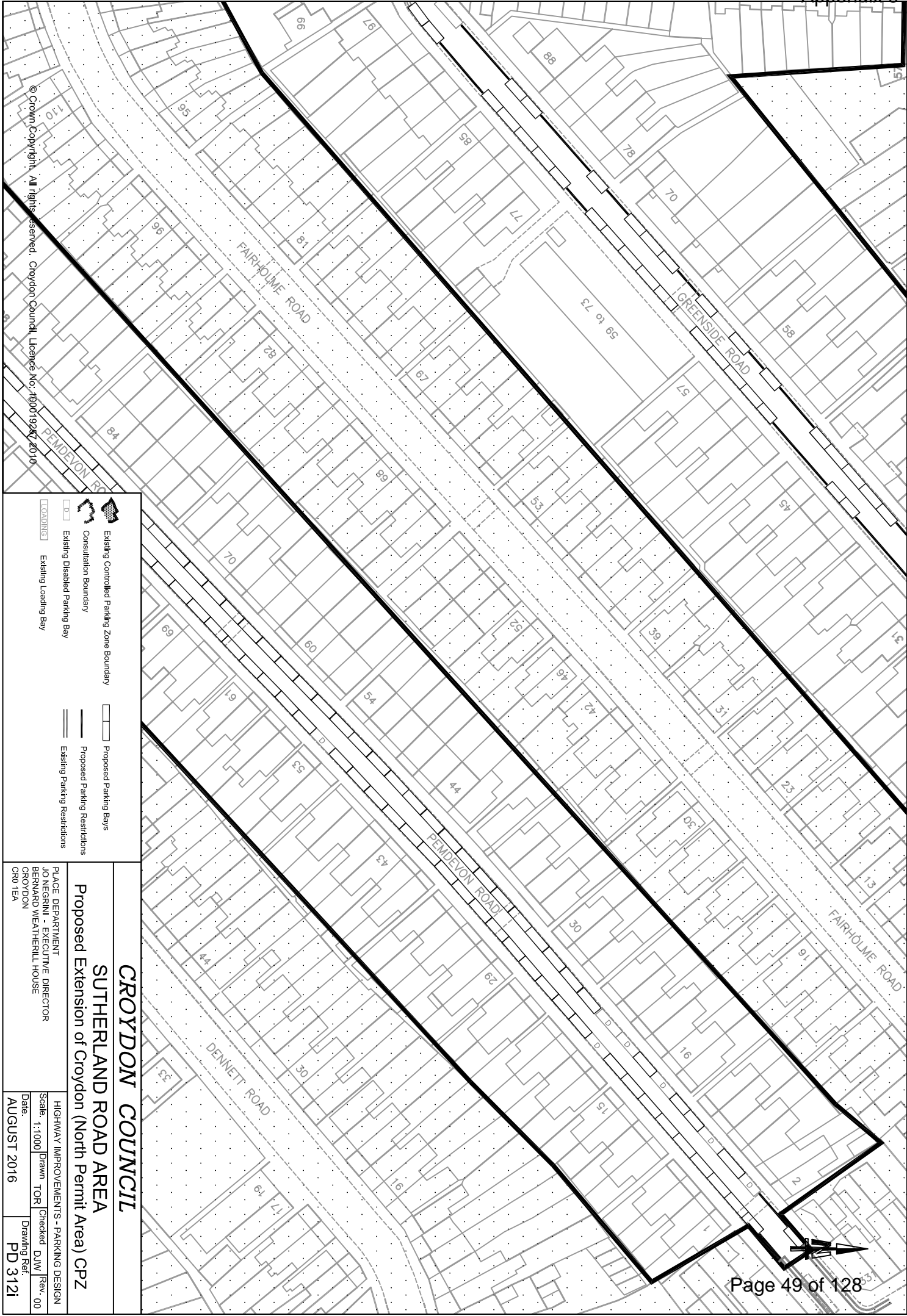


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	Existing Controlled Parking Zone Boundary		Proposed Parking Bays
	Consultation Boundary		Proposed Parking Restrictions
	Existing Disabled Parking Bay		Existing Parking Restrictions
	Existing Loading Bay		

CROYDON COUNCIL	
SUTHERLAND ROAD AREA	
Proposed Extension of Croydon (North Permit Area) CPZ	
PLACE DEPARTMENT JO NEGRINI - EXECUTIVE DIRECTOR BERNARD WEATHERILL HOUSE CROYDON CR0 1EA	
HIGHWAY IMPROVEMENTS - PARKING DESIGN Scale: 1:1000 Date: AUGUST 2016	Drawn: TOR Checked: DW Rev: 00 Drawing Ref: PD 312h

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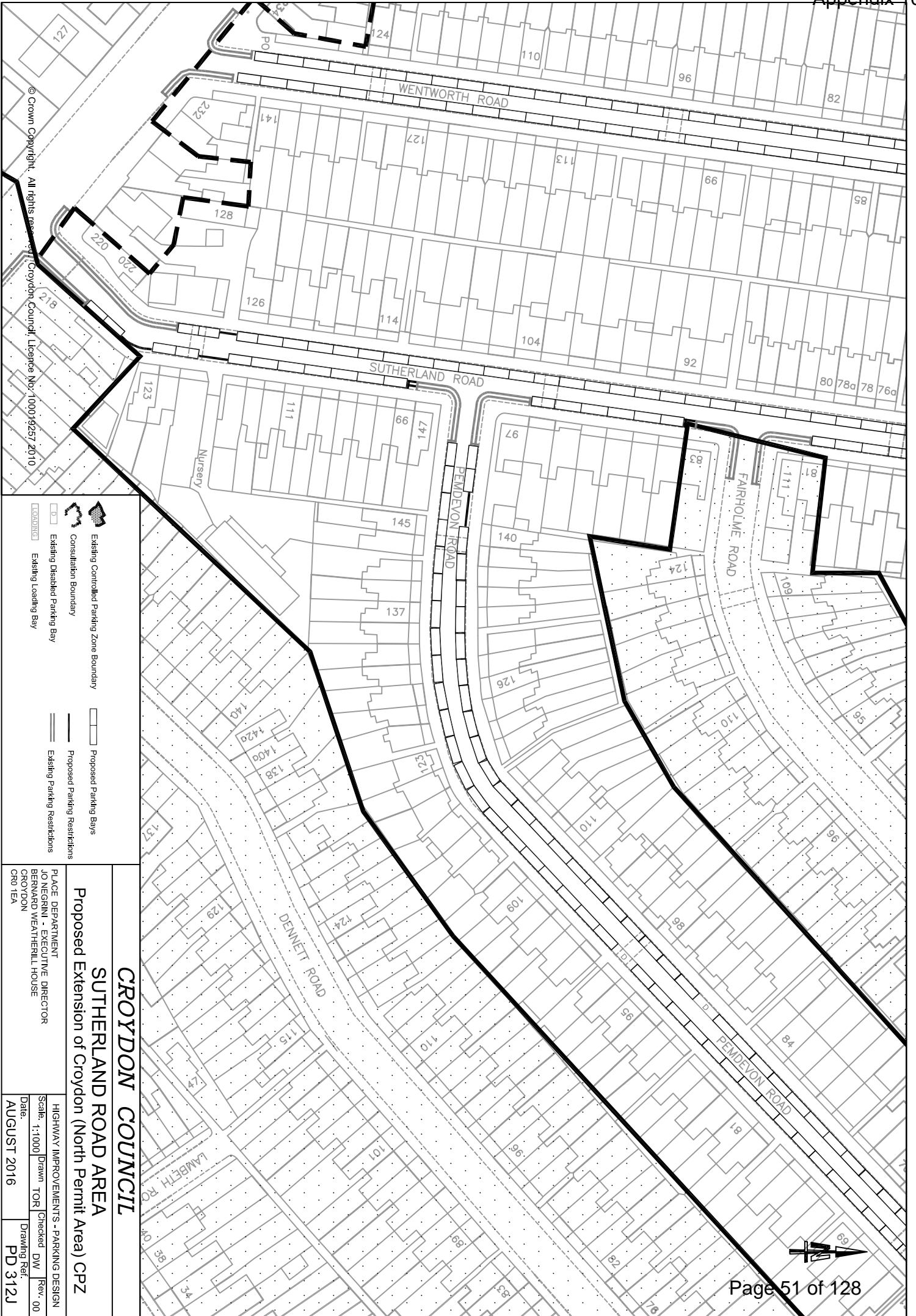
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	Existing Controlled Parking Zone Boundary		Proposed Parking Bays
	Consultation Boundary		Existing Parking Restrictions
	Existing Disabled Parking Bay		
	Existing Loading Bay		

CROYDON COUNCIL	
SUTHERLAND ROAD AREA	
Proposed Extension of Croydon (North Permit Area) CPZ	
PLACE DEPARTMENT JO NEGRINI - EXECUTIVE DIRECTOR BERNARD WEATHERILL HOUSE CROYDON CR0 1EA	
HIGHWAY IMPROVEMENTS - PARKING DESIGN Scale: 1:1000 Date: AUGUST 2016	
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	Existing Controlled Parking Zone Boundary		Proposed Parking Bays
	Consultation Boundary		Proposed Parking Restrictions
	Existing Disabled Parking Bay		Existing Parking Restrictions
	Existing Loading Bay		

CROYDON COUNCIL

SUTHERLAND ROAD AREA

Proposed Extension of Croydon (North Permit Area) CPZ

PLACE DEPARTMENT
 JO NEGRINI - EXECUTIVE DIRECTOR
 BERNARD WEATHERILL HOUSE
 CROYDON
 CR0 1EA

HIGHWAY IMPROVEMENTS - PARKING DESIGN	Scale: 1:1000	Drawn: TOR	Checked: DW	Rev: 00
Date: AUGUST 2016			Drawing Ref: PD 312J	



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Croydon Council

For general release

REPORT TO:	TRAFFIC MANAGEMENT ADVISORY COMMITTEE 5 October 2016
AGENDA ITEM:	8
SUBJECT:	DUPPAS HILL LANE, PROPOSED OFF-STREET CAR PARK – OBJECTIONS
LEAD OFFICER:	Jo Negrini, Chief Executive and Executive Director of Place
CABINET MEMBER:	Councillor Stuart King, Cabinet Member for Transport And Environment
WARDS:	Waddon
CORPORATE PRIORITY/POLICY CONTEXT: This report is in accordance with objectives to improve the safety and reduce obstructive parking on the Borough's roads as detailed in: <ul style="list-style-type: none">• The Croydon Plan; Transport Chapter.• The Local Implementation Plan; 3.6 Croydon Transport policies• Croydon's Community Strategy; Priority Areas 1, 3, 4 and 6• Croydon Corporate Plan 2013 – 16• www.croydonobservatory.org/strategies/	
FINANCIAL IMPACT: N/A	
FORWARD PLAN KEY DECISION REFERENCE NO.: Not a Key Decision	
1. RECOMMENDATIONS That the Traffic Management Advisory Committee recommend to the Cabinet Member for Transport and Environment that they:- <ol style="list-style-type: none">1.1 Consider the objections received in response to the public notice detailing the Council's proposal to introduce an off street Car Park in Duppas Hill Lane with a combination of shared-use Permit / Pay & Display Bays (4 hour maximum stay) operating 9am to 5pm, Monday to Saturday.1.2 Agree for the reasons set out in this report to introduce an amended 'Housing type' permit scheme with residents requiring to display a housing parking permit in an off-street car park in Duppas Hill Lane as shown in Plan No.285e.1.3 Delegate to the Highway Improvement Manager, Streets Directorate the authority to give notice and subject to receiving no material objections make the necessary Traffic	

Management Orders under the Road Traffic Regulation Act 1984 (as amended) in order to implement Recommendation 1.2 above.

- 1.4 Note that any material objections received following the giving of public notice will be reported to a future Traffic Management Advisory Committee for Members' consideration.

2 EXECUTIVE SUMMARY

- 2.1 The purpose of this report is to consider objections received from the public following the formal consultation process on a proposal to introduce a shared-use Permit / Pay & Display off-street car park in Duppas Hill Lane. Due to comments and objections from local residents in the form of a petition, it is proposed to introduce a new Housing type permit scheme for the off-street parking area in Duppas Hill Lane subject to a further public notice and consideration of any objections.

3 BACKGROUND

- 3.1 A Petition was originally received signed by most residents in Duppas Hill Lane to introduce controlled parking in the parking areas alongside Duppas Hill Lane due to parking issues in this area.
- 3.2 With no parking controls in place local residents are experiencing problems with commuter parking and issues with abandoned vehicles. The introduction of a shared-use Permit/Pay & Display scheme would improve parking conditions for residents of Duppas Hill Lane as any non-permit holder parked in this area would be liable for a Penalty Charge Notice by Parking Enforcement.
- 3.3 The parking area to the side of the carriageway allows parking for up to 20 vehicles at right angles. This land is shown as Council freehold land whereas only the carriageway is classed as adopted highway. There are currently signs at the entrance to the road stating 'adopted road – residents parking only' but there are no controls on who parks there.
- 3.4 This road is within the West Permit Zone and residents would be entitled to permits although the nearest shared-use Permit / Pay & Display parking bays are a distance away. Due to the close proximity to the Town Centre, which is 5 to 10 minutes walk away, and lack of control, the area is increasingly being used by non-residents and probably commuters parking to the detriment of local residents.
- 3.5 Following the petition which was reported to this committee at the meeting of 6 October 2015 (minute A63/15 refers), Council officers consulted the residents in Duppas Hill Lane to introduce a new shared-use Permit / Pay & Display car park in the parking area alongside Duppas Hill Lane. The overall response (as reported to the committee at the meeting of 26 April 2016 – minute A31/16 refers) was positive and the committee approved a report recommending that formal consultation take place using public notices.

4 OBJECTION & RESPONSE

Objection

- 4.1 Following the public notice, which was published on 18 May 2016, a petition signed by 20 residents including a pro-forma type petition has been received signed by 8 residents stating that they want a housing type permit scheme and feel that as the area is not on the highway this would be more appropriate for a car park which should really only be used by residents of the residential block in Duppas Hill Lane.

Response

- 4.2 After consideration of the objection it has been concluded that a Housing type scheme, where annual permits are currently charged at £27 and £42 for the first and second permit issued to a household respectively, would be effective and provide reasonably priced parking for residents whilst reducing the current commuter and abandoned vehicle issues. As with similar Housing schemes Visitor permits would also be available at the current cost of £50 per annum or on a Ringo cashless parking arrangement costing £2.40 per day.

5 CONSULTATION

- 5.1 The legal process requires that formal consultation takes place in the form of Public Notices published in the London Gazette and a local paper (Croydon Guardian). Although it is not a legal requirement this Council also fixes street notices to lamp columns in the vicinity of the proposed scheme and writes to occupiers who are directly affected to inform as many people as possible of the proposals.
- 5.2 Official bodies such as the Fire Brigade, the Cyclists' Touring Club (CTC), The Pedestrian Association, Age UK, The Owner Drivers' Society, The Confederation of Passenger Transport and bus operators are consulted under the terms of the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. Additional bodies, up to 27 in total, are consulted depending on the relevance of the proposals. No objections or comments were received from these organisations.
- 5.3 Once the notices have been published the public has 21 days to comment or object to the proposals. If no relevant objections are received, subject to agreement to the delegated authority sought by the Recommendations, the Traffic Management Order is then made. Any relevant objections received will be reported back to this Committee for a recommendation as to whether the scheme should be introduced as originally proposed, amended or abandoned and objectors informed of the decision.

6 FINANCIAL CONSIDERATIONS

- 6.1 There is a revenue budget of £50k for CPZ undertakings and £50k for Footway Parking and Disabled Bays, from which these commitments if approved will be funded. Attached to the papers of this meeting is a summary of the overall financial impact of this and other applications for approval at this meeting. If all applications were approved there would remain £62k un-allocated to be utilised in 2016/2017 this is taking into account £13k that was committed in 2015/2106 against the 2016/2107 financial years spend.

6.2 Revenue and Capital consequences of report recommendations

	Current Financial Year	M.T.F.S – 3 year Forecast		
	2016/17	2017/18	2018/19	2019/20
	£'000	£'000	£'000	£'000
<u>Revenue Budget available</u>				
Expenditure	100	100	100	100
Income	0	0	0	0
<u>Effect of Decision from Report</u>				
Expenditure	0	0	0	0
Income	0	0	0	0
Remaining Budget	<u>100</u>	<u>100</u>	<u>100</u>	<u>100</u>
<u>Capital Budget available</u>				
Expenditure	30	70	0	0
<u>Effect of Decision from report</u>				
Expenditure	5	70	0	0
Remaining Budget	<u>25</u>	<u>0</u>	<u>0</u>	<u>0</u>

6.3 The effect of the decision

- 6.3.1 The cost of introducing an enforceable Housing type permit car park scheme for Duppas Hill Lane, is estimated at £1,000.
- 6.3.2 This cost can be contained within the available capital budget for Controlled Parking Schemes under the Local Implementation Plan (LIP) projects for 2016/17.

6.4 Risks

- 6.4.1 There is a risk that the final cost will exceed the estimate. However, this work is allowed for in the current budget.
- 6.4.2 If the off street car park is introduced future income will be generated from housing permit sales, together with enforcement of these controls through vehicle removals and Penalty Charge Notices.

6.5 Options

- 6.5.1 The alternative option is not to introduce the housing permit scheme in the off-street car park. This could have a detrimental effect on residents in that they would continue to suffer with parking issues in relation to abandoned vehicles, commuter parking and ongoing parking problems.

6.6 Savings/ future efficiencies

6.6.1 The current method of introducing parking controls is very efficient with the design and legal work being carried out within the department. The marking of the bays and the supply and installation of signs and posts is carried out using the new Highways Contract and the rates are lower than if the schemes were introduced under separate contractual arrangements.

6.6.2 Approved by: Zulf Darr, Interim Head of Finance, Place and Resources.

7 COMMENTS OF COUNCIL SOLICITOR AND MONITORING OFFICER

7.1 The Solicitor to the Council comments that Section 6, 124 and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984 (as amended) provides powers to introduce implement and revoke Traffic Management Orders. In exercising this power, section 122 of the Act imposes a duty on the Council (so far as is 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 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.

7.3 Approved for and on behalf of Jacqueline Harris-Baker, Acting Council Solicitor and Acting Monitoring Officer.

8. HUMAN RESOURCES IMPACT

8.1 There are no human resource implications arising from this report.

8.2 Approved by: Adrian Prescod, HR Business Partner, for and on behalf of Director of Human Resources, Chief Executive Department.

9. CUSTOMER IMPACT

9.1 The proposed housing parking scheme is in response to a previous consultation and known parking issues. The occupiers of all the residential premises in the area were consulted to ensure that all those potentially affected by the proposal were given the opportunity to give their views. Parking controls are only introduced in the area where the majority of residents are in favour of a scheme. The proposals are therefore likely to be seen as a positive move by the Council and should improve residents' views of the work carried out by the Council.

10 EQUALITIES IMPACT

- 10.1 An initial Equalities Impact Assessment (EqIA) has been carried out and it is considered that a Full EqIA is not required.

11. ENVIRONMENTAL IMPACT

- 11.1 Parking schemes are designed so that the signing is kept to a minimum to reduce the environmental impact. Narrow 50mm wide lines can be used in environmentally sensitive and conservation areas.

12. CRIME AND DISORDER REDUCTION IMPACT

- 12.1 There are no such considerations arising from this report.

13. REASONS FOR RECOMMENDATIONS

- 13.1 The recommendation is to introduce the housing permit scheme in Duppas Hill Lane, this is based on the majority of residents which have stated that they would like to see resident only permits for the said road.

14. OPTIONS CONSIDERED AND REJECTED

- 14.1 The alternative option would be not to proceed with the proposed housing permit scheme, which would not accord with the expressed preference of the majority of those who responded to the formal consultation.

REPORT AUTHOR

Paul Tarrant, Traffic Engineer
Infrastructure, Parking Design, 020 8726 6000
(Ext. 88256)

CONTACT OFFICER:

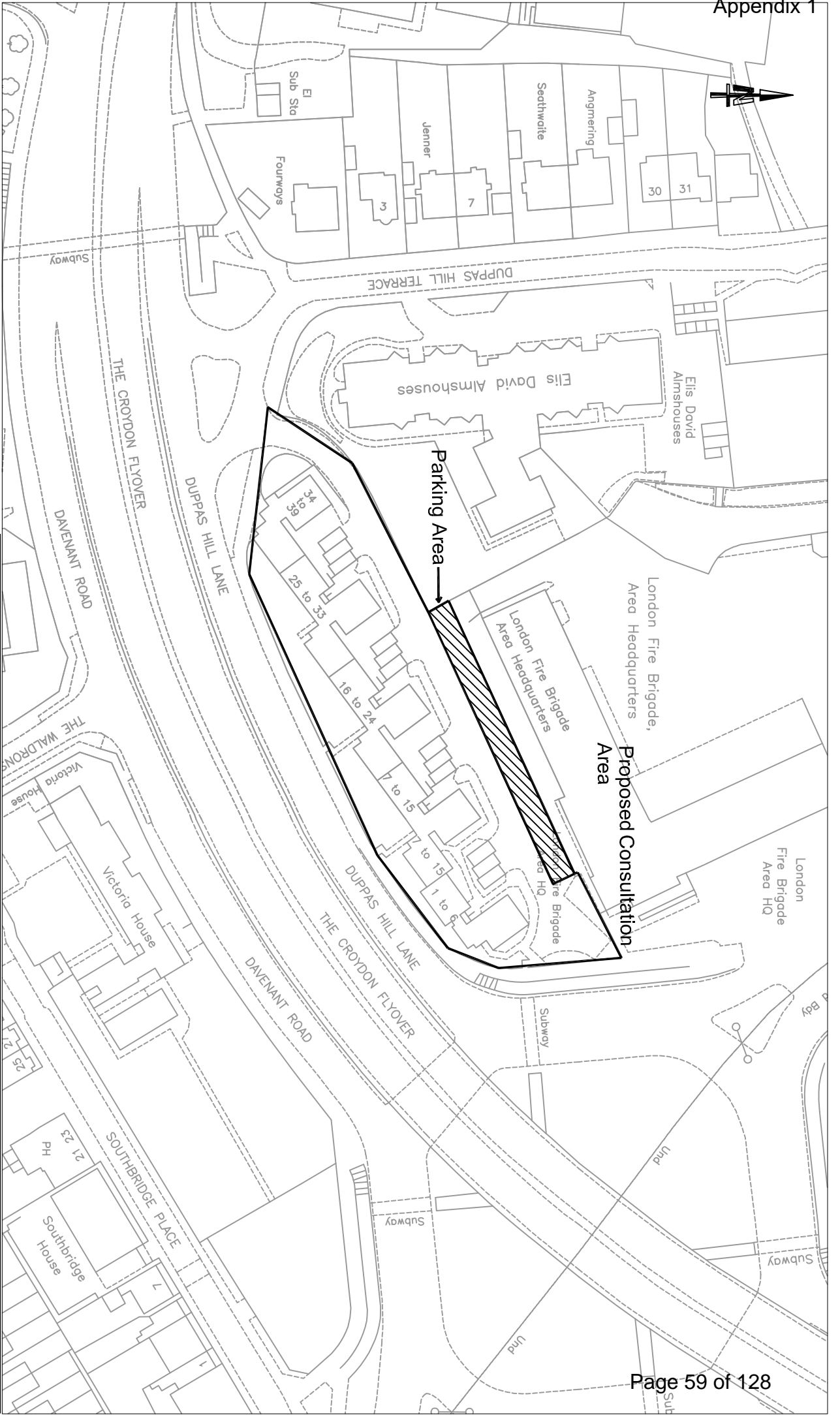
David Wakeling, Traffic Design Manager
Infrastructure, Parking Design, 020 8726 6000
(Ext. 88229)

BACKGROUND DOCUMENTS

None

APPENDIX:

Appendix 1 – Proposed consultation area map



Duppas Hill Lane, Croydon

CROYDON COUNCIL

Proposed consultation

PLACE DEPARTMENT
 JO NEGRINI - EXECUTIVE DIRECTOR
 PO BOX No. 1482
 CROYDON
 CR9 1WX

Scale:	NTS	Drawn:	PT	Checked:	DJW	Rev.:	00
Date:	September 2015	Drawing Ref.:					PD-285e

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REPORT TO:	TRAFFIC MANAGEMENT ADVISORY COMMITTEE 5 October 2015
AGENDA ITEM:	9
SUBJECT:	OBJECTIONS TO PROPOSED PARKING BAYS
LEAD OFFICER:	Jo Negrini, Chief Executive and Executive Director of Place
CABINET MEMBER:	Councillor Stuart King, Cabinet Member for Transport and Environment
WARDS:	Coulsdon West, Fairfield and Selhurst
<p>C This report is in accordance with objectives to improve the safety and reduce obstructive parking on the Borough’s roads as detailed in:</p> <ul style="list-style-type: none"> • Croydon Local Plan – Nov 2015 • Local Implementation Plan 2; 2.8 Transport Objectives • Croydon’s Community Strategy 2013-18; Priority Areas 1, 2 & 3 • Croydon Corporate Plan 2015 – 18 • www.croydonobservatory.org/strategies/ 	
<p>FINANCIAL IMPACT These proposals can be contained within available budget.</p>	
<p>FORWARD PLAN KEY DECISION REFERENCE NO.: Not a Key Decision</p>	

<p>1. RECOMMENDATIONS</p> <p>That the Traffic Management Advisory Committee recommend to the Cabinet Member for Transport and Environment that they:</p> <p>1.1 Consider the objections received in response to the public notice detailing the Council’s proposal to introduce additional space for up to seven cars in the free parking bays in Chipstead Valley Road, Coulsdon, five new shared-use Permit / Pay & Display bays in Chatsworth Road, Croydon, three new bays in Edridge Road, Croydon and six new shared use parking bays in Gloucester Road, Croydon. See plans PD 301a, b, c, d & e, 301 j,k & l.</p> <p>1.2 Proceed to introduce the above proposals with the exception of 2 bays in Chipstead Valley Road and one bay in Edridge Road and Chatsworth Road as detailed in section 3 of this report</p> <p>1.3 Delegate to the Highway Improvement Manager, Highways, the authority to make the necessary Traffic Management Orders under the Road Traffic Regulation Act 1984 (as amended).</p> <p>1.4 Inform the objectors of the above decision.</p>
--

2. EXECUTIVE SUMMARY

- 2.1 The purpose of this report is to consider objections from the public following the formal consultation process on proposals to introduce space for up to seven cars in the free parking bays in Chipstead Valley Road, Coulsdon, five new shared-use bays in Chatsworth Road, Croydon, three new bays in Edridge Road, Croydon and six new shared use parking bays in Gloucester Road, Croydon.
- 2.2 The Executive Director is of the view that it is appropriate that the objections to the introduction of shared use parking is considered by TMAC because the original proposal was approved through this committee and objectors have been informed that the decision on whether to proceed with these proposal will be taken by the committee.

3. OBJECTIONS AND RESPONSES

3.1 Chipstead Valley Road, Coulsdon West

- 3.2 A request was received from a local resident for additional parking bays to be provided at Chipstead Valley Road, Coulsdon. The giving of public notice for approximately 7 additional free bays was approved by the Traffic Management Advisory Committee in April 2016.
- 3.3 Three people have objected to the proposed bays.
- The first objector feels that the proposed bay at no. 183/185 will make it difficult to turn left out of Woodcote Lodge.
 - The second objector feels that the bay at 183/185 will cause a physical obstruction for drivers turning left out of Woodcote Lodge, and block the view of oncoming traffic for those turning right and that a similar problem will be caused by the bays at 189/191 for the traffic leaving the petrol station. They are also concerned that traffic turning right out of Vincent Road will have reduced visibility of traffic coming from the east. They highlight the current problems with queuing traffic obstructed by parked cars and that this section of road is particularly busy due to the presence of several local businesses.
 - The third objector is objecting to the proposal on the grounds that it would obstruct moving traffic on Chipstead Valley Road and cause a visual obstruction to drivers exiting Woodcote Lodge. They believe that there is no parking problem in the area.
- 3.4 **Response** – Parking is very limited along this stretch of Chipstead Valley Road and officers recognise that residents may struggle to park here. In light of the objections received to the two bays at 183/185 and 189/191 and considering that Chipstead Valley Road is a 'B' road and a bus route it is recommended that these do not proceed. It is likely that encouraging parking at these locations may cause significant obstruction to site lines of manoeuvring vehicles as well as physically obstructing the road.

3.7 It is proposed not to proceed with the bays at 185/185 and 189/191 Chipstead Valley Road, illustrated on drawing no. **PD 301a**.

3.8 Chatsworth Road, Fairfield

3.9 A request was received from a resident of Chatsworth Road for additional parking bays to be implemented. This street is within the Croydon (Central Permit Area) CPZ. Many of the houses have been subdivided into flats resulting in a high demand for parking spaces. Officers identified potential locations for 5 new shared-use bays and this was agreed by this committee at the meeting of 26 April 2016 (minute A32/16 refers).

3.10 An objection was received to the proposed additional bay at 70/72. There is one existing bay at this location and the proposal would move the bay south by approximately 1.5m and introduce an additional bay adjacent to it.

3.11 The objection has been raised on the grounds that a new parking bay will obstruct the view from their front room and obstruct the view of their garden from the street. They believe that the bay will cast a shadow on the pavement at night. The objectors are concerned that the new parking bay will contribute to the obstruction of traffic in Chatsworth Road and that it will cause a hazard to cars leaving their drive.

3.12 **Response** – Officers have revisited the site and acknowledge that it would be difficult for drivers to manoeuvre left out of the driveway around vehicles parked in the bays, if the additional bay went ahead at this location, particularly as there are bays on both sides of the road. Obstructing a view from a front room and garden and casting a shadow across the pavement are not considered relevant objections.

3.13 Due to the manoeuvring issues it is proposed not to proceed with the additional bay at 70/72 Chatsworth Road, illustrated on drawing no. **PD 301p**.

3.14 Edridge Road, Fairfield

3.15 A resident of Edridge Road requested that additional shared-use Permit / Pay & Display parking bays be provided on the road where residents frequently struggle to find space to park. Edridge Road is narrow with many dropped kerbs. As a result there are not many places where additional bays can be placed. Only three new bays were agreed by this committee at the meeting of 26 April 2016 (minute A32/16 refers).

3.16 An objection was received to the proposed parking bay at no. 75 Edridge Road. The objection was raised on the grounds that the bay would be placed across a dropped kerb, blocking access to a driveway.

3.17 **Response** – The council never intended to put a bay at this location. An error was made when producing the electronic drawing. This bay should not proceed and the resident who objected has been notified of this outcome.

3.18 It is recommended to proceed with the additional bays outside no.77 & 113/115 Edridge Road but not to proceed with the additional bay at 75 Edridge Road,

illustrated on drawing no. **PD301d**.

3.19 Gloucester Road, Selhurst

3.20 A local resident requested that the council provide additional parking bays in the vicinity of Gloucester Road where, due to new and proposed housing developments, residents struggle to find available parking spaces. As a result officers proposed to introduce six additional shared use parking bays at various locations on Gloucester Road between St. James' Road and Swan Close agreed by this committee at the meeting of 26 April 2016 (minute A32/16 refers).

3.21 Three objections were received to these bays. Two of the objections related to the additional bay at 30-34 Gloucester Road and one related to the additional bay at 68/70 Gloucester Road.

- The first objection was to the additional bay at 30-34, on the grounds that it is already difficult to manoeuvre on and off the objectors driveway and that the situation will worsen if the proposed bay layout were to proceed. The objector is concerned that due to the high volume of traffic along Gloucester Road, the proposed parking configuration would limit places where vehicles could safely pass each other. He also highlights the new Milton House development which will have an entrance onto Gloucester Road, directly across from this bank of parking bays, and expresses concern for road safety at this point once the development is complete.
- The second objection also relates to the additional bay at 30-34. The objector feels that the proposed change in the parking bays will reduce passing places and hence be detrimental to road safety, and that these issues will be exacerbated by the Milton House development. They are concerned about residents with dropped kerbs having less space to manoeuvre on and off their driveways.
- The third objection is to the proposed bays at 68/70 Gloucester Road. The objector has highlighted the problem of articulated lorries servicing the businesses near this location. The proposed bays will make it extremely difficult to manoeuvre into the premises, as well as causing an obstruction for large vehicles which turn into Gloucester Road from Gladstone Road.

3.22 **Response** – Officers have looked at the planning documents for the Milton House development and confirmed that the entrance across from the bays at 30-34 Gloucester Road will be used by vehicles visiting the development, including the refuse collection lorries, who's turning radius will require this bank of bays to remain as it is. It is proposed not to proceed with the additional bay at 30-34 Gloucester Road.

3.23 The proposed bays at 68/70 are likely to cause an obstruction to large vehicles at the Gladstone Road junction and accessing the local industrial premises. This was an oversight and it is recommended that these 2 bays not proceed.

3.24 It is proposed not to proceed with the additional bays at 30-34 and 68/70 Gloucester Road, illustrated on drawing no's **PD301j** and **PD 301k**.

4. CONSULTATION

- 4.1 The purpose of this report is to consider comments and objections from the public following the formal consultation process on proposals to reduce the amount of free parking spaces in Fernwood, adjacent to the junction with Friars Wood and to introduce five additional shared use bays in Station Approach Road, Coulsdon. Once the notices were published, the public had up to 21 days to respond.
- 4.2 The legal process requires that formal consultation takes place in the form of Public Notices placed in the London Gazette and a local newspaper (Croydon Guardian). Although it is not a legal requirement, this Council also fixes notices on lampposts and signposts in the vicinity of the proposed scheme to inform as many people as possible of the proposals.
- 4.3 Organisations such as the Police, Fire Brigade, the Cycling Council for Great Britain, The Pedestrian Association, Age UK, The Owner Drivers' Society, The Confederation of Passenger Transport and bus operators are consulted separately at the same time as the Public Notice. Other organisations are also consulted, depending on the relevance of the proposal.

5 FINANCIAL CONSIDERATIONS

- 5.1 There is a revenue budget of £50k for CPZ undertakings and £50k for Footway Parking and Disabled Bays, from which these commitments if approved will be funded. Attached to the papers of this meeting is a summary of the overall financial impact of this and other applications for approval at this meeting. If all applications were approved there would remain £62k un-allocated to be utilised in 2016/2017 this is taking into account £13k that was committed in 2015/2106 against the 2016/2107 financial years spend.

5.2 Revenue and Capital consequences of report recommendations

	Current Financial Year	M.T.F.S – 3 year Forecast		
	2016/17	2017/18	2018/19	2019/20
	£'000	£'000	£'000	£'000
<u>Revenue Budget available</u>				
Expenditure	100	100	100	100
Income	0	0	0	0
<u>Effect of Decision from Report</u>				
Expenditure	2	0	0	0
Income	0	0	0	0
Remaining Budget	<u>98</u>	<u>100</u>	<u>100</u>	<u>100</u>
<u>Capital Budget available</u>				
Expenditure	0	0	0	0
<u>Effect of Decision from report</u>				
Expenditure	0	0	0	0
Remaining Budget	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

5.3 The effect of the decision

5.3.1 The cost of the above proposals including the legal process is estimated at £2,400.

5.3.2 These costs can be contained within the available revenue budget for 2016/17.

5.4 Risks

5.4.1 Whilst there is a risk that the final cost will exceed the estimate, this work is allowed for in the current budget for 2016/17.

5.5 Options

5.5.1 The alternative option is not to introduce the parking bays as set out in the report which would not benefit residents, customers (including disabled) and businesses.

5.6 Savings/future efficiencies

- 5.6.1 The current method of introducing/removing or amending parking bays is very efficient with the design and legal work being carried out within the department. The marking of the bays is carried out using maintenance rates through the new Highways contract and these are lower than if the schemes were introduced under separate contractual arrangements.
- 5.6.2 Any signs that are required are sourced from the new Highways contractor where rates are competitive.
- 5.6.3 Although unquantifiable at this stage there may be additional income that arises from these changes, although any additional income will be of a small value.
- 5.6.4 Approved by: Zulf Darr, Interim Head of Finance, Place and Resources

6. COMMENTS OF THE COUNCIL SOLICITOR, AND MONITORING OFFICER

- 6.1 The Solicitor to the Council comments that Section 6, 124 and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984 (as amended) provides powers to introduce and implement Traffic Management Orders. In exercising this power, section 122 of the Act imposes a duty on the Council (so far as is 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.
- 6.2 The Council has complied 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 by the members before a final decision is made.
- 6.3 Approved for and on behalf of Jacqueline Harris-Baker, Acting Council Solicitor and Acting Monitoring Officer.

7. HUMAN RESOURCES IMPACT

- 7.1 There are no human resources implications arising from this report.
- 7.2 Approved by: Adrian Prescod, HR Business Partner, for and on behalf of Director of Human Resources, Chief Executive Department.

8. EQUALITIES CONSIDERATIONS

- 8.1 A Full Equalities Impact Assessment (EqIA) is appended to this report.

9. ENVIRONMENTAL IMPACT

9.1 There are no such impacts arising from this report.

10. CRIME AND DISORDER REDUCTION IMPACT

10.1 There are no such impacts arising from this report.

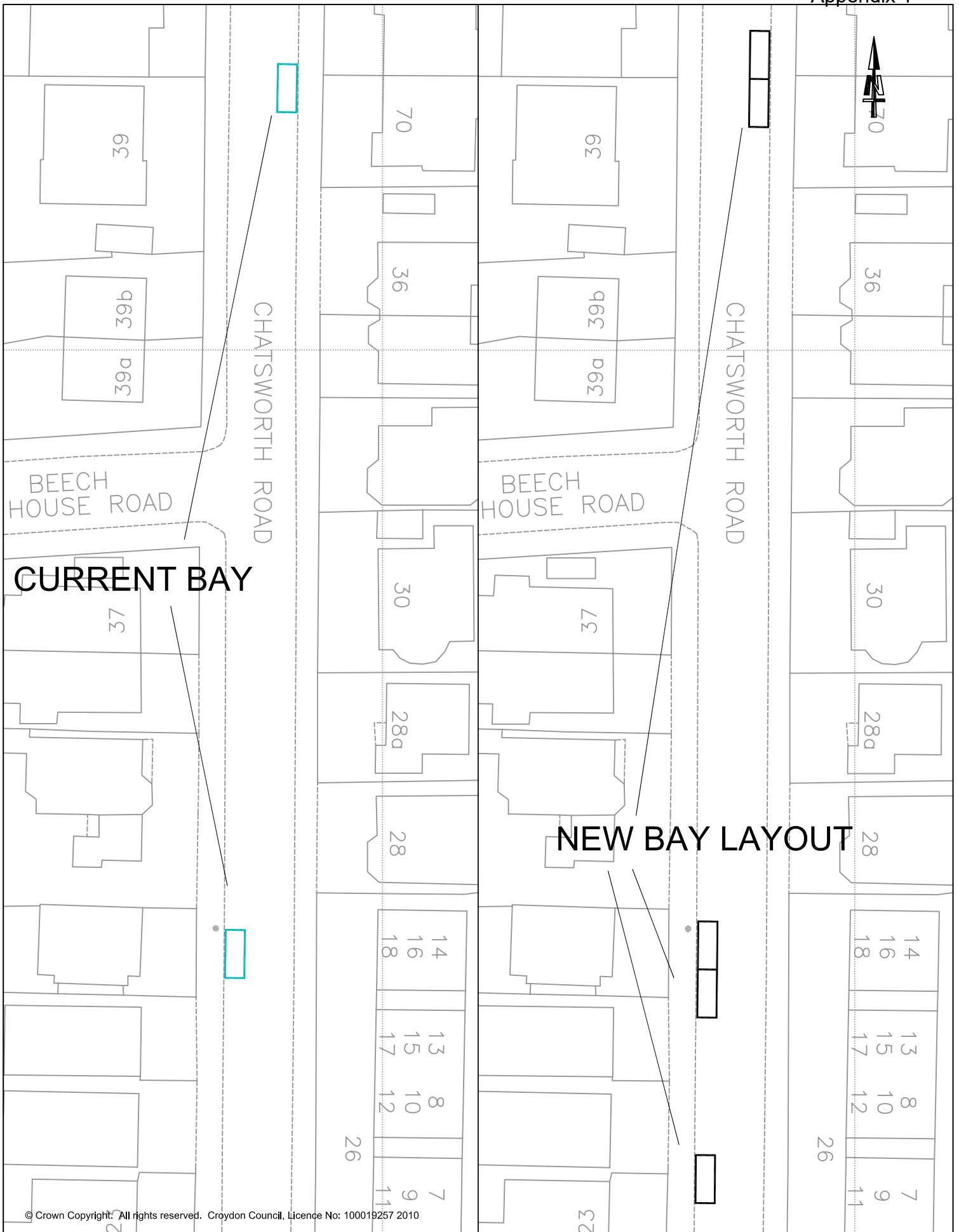
11. REASONS FOR RECOMMENDATIONS

11.1 The recommendations are for additional bays to improve access for residents and customers to local businesses;

12. OPTIONS CONSIDERED AND REJECTED

12.1 There are no other viable options to help, residents, businesses, disabled blue badge holders and visitors at these locations.

REPORT AUTHOR:	Teresa O'Regan – Traffic Engineer Infrastructure Parking Design, 020 8762 6000 (Ext. 88260)
CONTACT OFFICER:	David Wakeling, Traffic Design Manager Infrastructure, Traffic Design, 020 8726 6000 (Ext. 88229)
BACKGROUND PAPERS:	None.
APPENDICES:	Appendix 1 – Chatsworth Road map Appendix 2 – Chipstead Valley Road map Appendix 3 – Edridge Road map Appendix 4 – 108 to 110 Gloucester Road map Appendix 5 – Palmerston Road map Appendix 6 – 68 to 80 Gloucester Road map



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CROYDON COUNCIL

CHATSWORTH ROAD - CROYDON
 Proposed Additional Shared Use Parking Bays

PLACE DEPARTMENT
 JO NEGRINI - EXECUTIVE DIRECTOR
 BERNARD WEATHERILL HOUSE
 CROYDON
 CR0 1EA

INFRASTRUCTURE - TRAFFIC DESIGN
 Scale: 1:500
 Drawn TOR
 Checked DW
 Rev. 00

Date: APRIL 2016

Drawing Ref. PD 301p

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NEW PARKING BAYS

CHIPSTEAD VALLEY ROAD

VINCENT ROAD

BARRIE CLOSE

Woodcote Lodge

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CROYDON COUNCIL

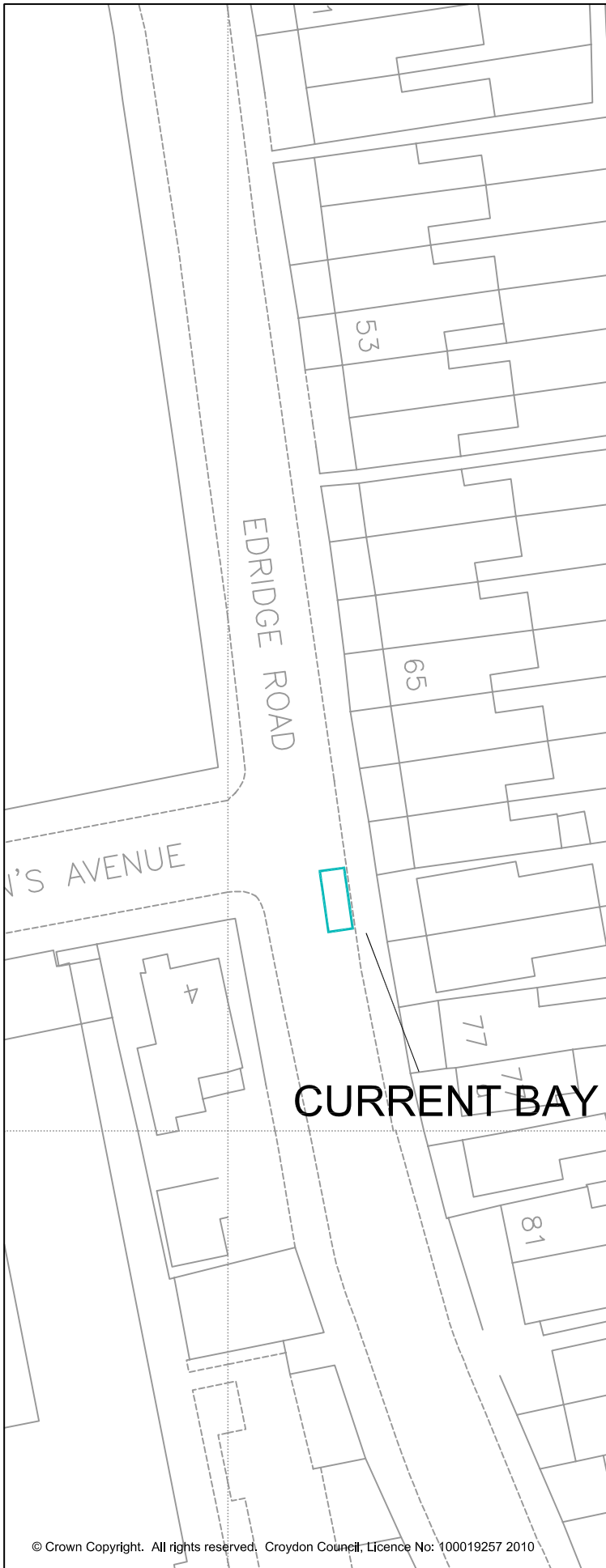
CHIPSTEAD VALLEY ROAD - COULSDON

Proposed Additional Free Parking Bays

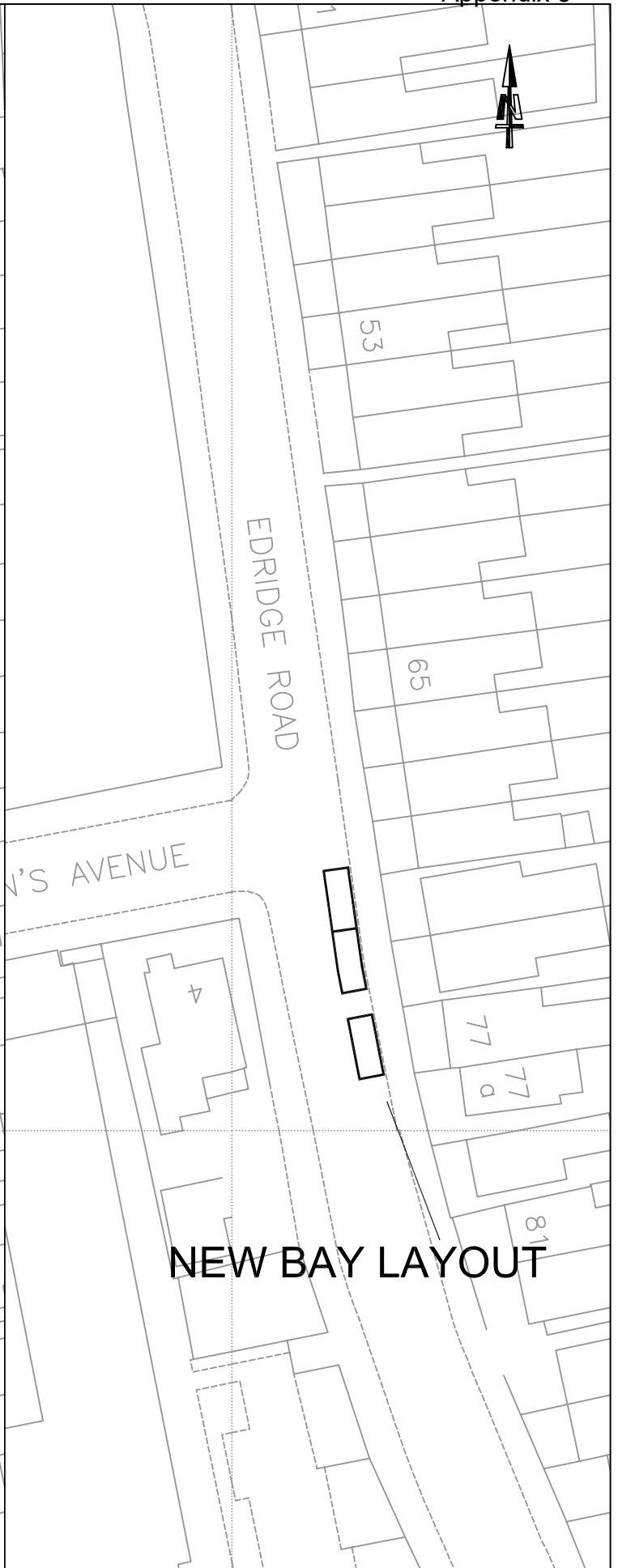
PLACE DEPARTMENT JO NEGRINI - EXECUTIVE DIRECTOR BERNARD WEATHERILL HOUSE CROYDON CR0 1EA	INFRASTRUCTURE - TRAFFIC DESIGN Scale: 1:500 Date: APRIL 2016	Drawn TOR Checked DW Rev., 00	Drawing Ref. PD 301a
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CURRENT BAY



NEW BAY LAYOUT

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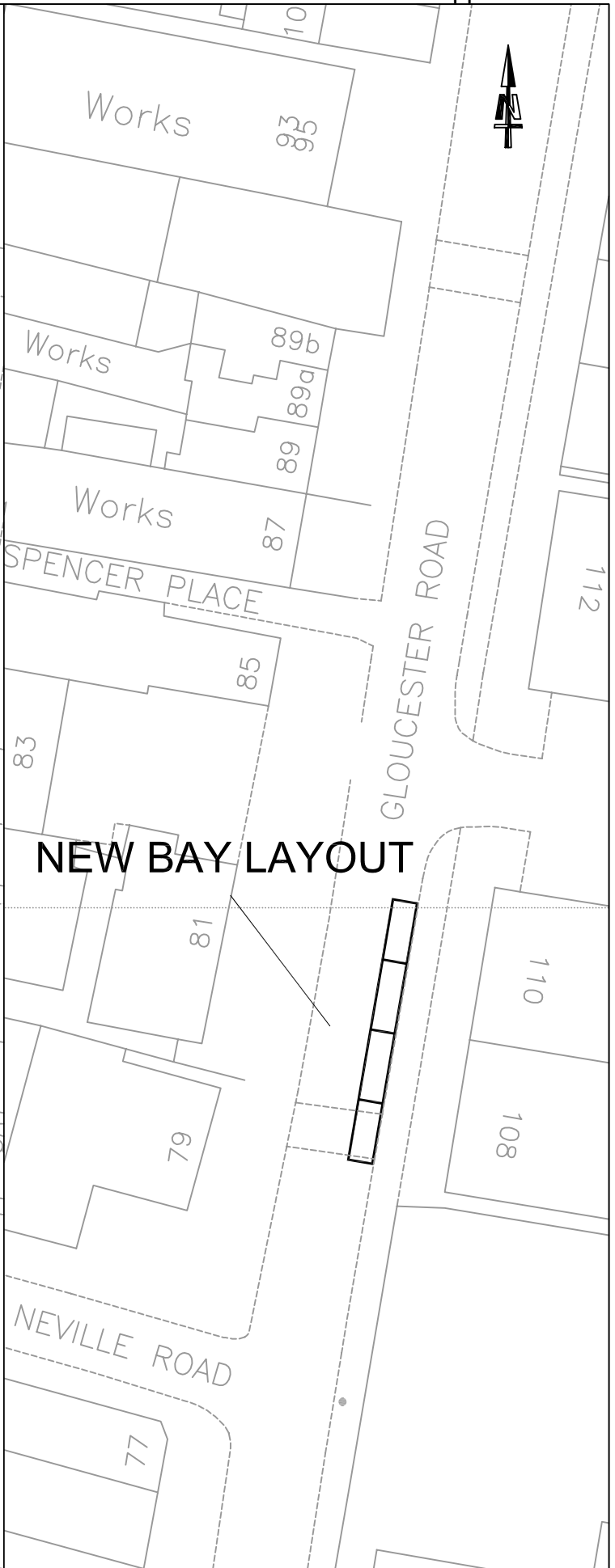
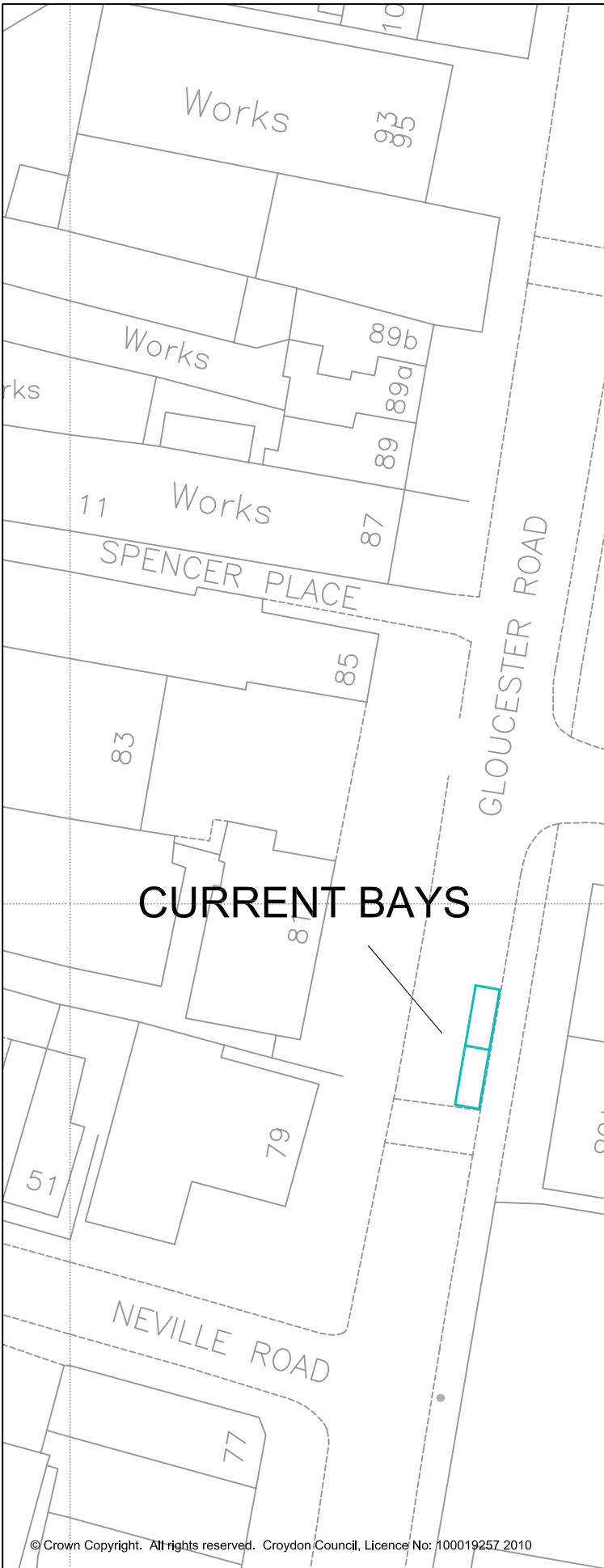
EDRIDGE ROAD - CROYDON
Proposed Additional Shared Use Parking Bays

PLACE DEPARTMENT
JO NEGRINI - EXECUTIVE DIRECTOR
BERNARD WEATHERILL HOUSE
CROYDON
CR0 1EA

INFRASTRUCTURE - TRAFFIC DESIGN
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CURRENT BAYS

NEW BAY LAYOUT

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GLOUCESTER ROAD - CROYDON
Proposed Additional Shared Use Parking Bays

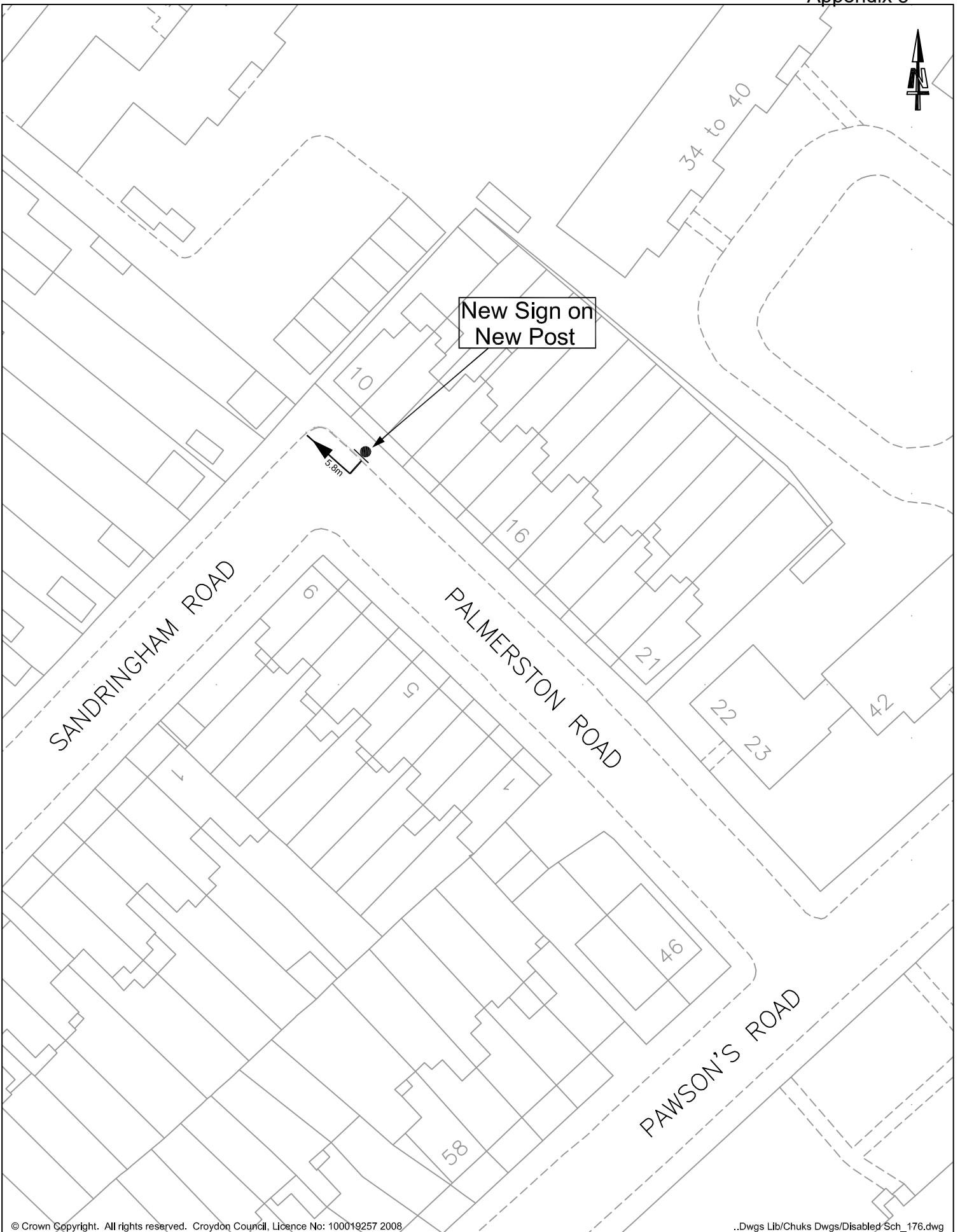
PLACE DEPARTMENT
JO NEGRINI - EXECUTIVE DIRECTOR
BERNARD WEATHERILL HOUSE
CROYDON
CR0 1EA

INFRASTRUCTURE - TRAFFIC DESIGN
Scale: 1:500 Drawn TOR Checked DW Rev. 00

Date: APRIL 2016

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..Dwgs Lib/Chuks Dwgs/Disabled_Sch_176.dwg



PROPOSED DISABLED BAY

SPECIFICATIONS:

1. Parking bay to Diag. 1028.3 of TSRGD 2002 @ 6.6m x 2.0m unless specified otherwise
2. Sign to Diag. 661A of TSRGD 2002 on new signpost or lamp column as shown

CROYDON COUNCIL

Palmerston Road, Croydon

PLACE DEPARTMENT
 JO NEGRINI - EXECUTIVE DIRECTOR
 PO Box No. 1462
 CROYDON
 CR9 1WX

HIGHWAYS - PARKING DESIGN

Scale: 1:500
 Date: FEBRUARY 2016
 Drawn: CAN
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NEW PARKING BAYS



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GLOUCESTER ROAD - CROYDON
Proposed Additional Shared Use Parking Bays

PLACE DEPARTMENT
JO NEGRINI - EXECUTIVE DIRECTOR
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CROYDON
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INFRASTRUCTURE - TRAFFIC DESIGN
Scale: 1:500 Drawn TOR Checked DW Rev. 00
Date: APRIL 2016 Drawing Ref. PD 301k

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For General Release

REPORT TO:	Traffic Management Advisory Committee 5 Oct 2016
AGENDA ITEM:	10
SUBJECT:	North-east Croydon Area-Wide 20mph Speed Limit (Statutory Consultation-Report on objections)
LEAD OFFICER:	Jo Negrini Executive Director - Place
CABINET MEMBER:	Councillor Stuart King Cabinet Member for Transport and Environment
WARDS:	Selhurst, South Norwood, Woodside, Ashburton, Shirley, Heathfield, Fairfield, Addiscombe
<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"> • Supporting 20 mph speed limits in residential areas where the communities want them. • 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-east Croydon is estimated to be £260,000. The cost of this proposal is to be met from the £300,000 Transport for London (TfL) allocation secured through the Local Implementation Plan (LIP) for 2016/2017.

KEY DECISION REFERENCE:

65/16/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 in response to the objections provided at Appendix 1 and agree, that the Highway Improvements Manager, Streets Division be authorised to make the necessary Road Traffic Management Order under the Road Traffic Regulation Act 1984 (as amended) so as to
 - a) Implement the maximum 20mph speed limit for north-east Croydon area as identified on plan HWY/20MPH/1284/02.

2. EXECUTIVE SUMMARY

- 2.1 This report details the objections received in response to the giving of public notice for the introduction of a maximum 20mph speed limit for the north-east Croydon area which is shown in the plan HWY/20MPH/1284/02 and attached at the end of appendix 2. Roads within the area which are to retain their existing maximum speed limit are described in Schedule 2 shown on the same plan and also described in the Traffic management Order attached within the same appendix 2.
- 2.2 All objections received in response to the Public Notice for the north-east Croydon 20mph scheme together with an officer response to each objection is attached in Appendix 1 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'.

The report can be accessed at

<https://secure.croydon.gov.uk/akscroydon/users/public/admin/kab14.pl?operation=SUBMIT&meet=2&cmt=SES&grp=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 procedure to be followed for the areas covering the borough of Croydon is briefly 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 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. Although not the subject of this current paper, officers can report that having followed the above procedure for the first area (previously referred to as North Croydon or Area 1), the implementation of the maximum 20mph scheme was completed in September 2016. The following sections of this report are in respect of the north-east Croydon 20mph proposal (also known as Area 2).
- 3.1.5. The process of obtaining public opinion on the north-east Croydon 20mph proposal was carried out in April/May 2016. The results of the community engagement/public opinion carried out with residents and businesses in the north-east Croydon area in May/June 2016 showed that 50.5% of respondents were in favour of lowering the speed limit compared to 47.1% against. 2.3% were unsure whilst 0.1% did not express any view on this matter. These results

were contained in a delegated officer report to the Executive Director of Place, who in July 2016 approved the officer recommendation to proceed with a statutory consultation for the north-east Croydon maximum 20mph proposal. The detailed report in respect of the community engagement is given as background paper 1 to this report.

- 3.1.6. The public notice (statutory consultation) in respect of the north-east Croydon area maximum 20mph proposal was given on 27 July 2016. The closing date for representations to be received by was 24 August 2016. The details of representations made objecting to the scheme are provided in Appendix 1.

4. STATUTORY CONSULTATION

- 4.1.1. The Public Notice for the north-east Croydon area maximum 20mph speed limit appeared in the Croydon Guardian on 27 July 2016. The Notice was also published in the London Gazette as required by regulations. The Traffic Management Order which is to be confirmed subject to approval of the scheme is attached as Appendix 2 to this report.
- 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 put up over 4000 public notices on lamp columns in every street in the area. The street Notice is attached as Appendix 3 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. No objections were received.
- 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. Ten representations were received against the North-Croydon maximum 20mph proposal, all of which together with the proposed officer response are attached in Appendix 1. 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. A 'No objection' to the scheme proposal was also received from the Metropolitan Police.
- 4.1.8. All objection letters together with a detailed officer response is contained within Appendix 1 of this report.

5. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

5.1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2016/17	2017/18	2018/19	2019/20
	£'000	£'000	£'000	£'000
Revenue Budget available				
Expenditure	0	0	0	0
Income	0	0	0	0
Effect of decision from report				
Expenditure	0	0	0	0
Income	0	0	0	0
Remaining budget	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Capital Budget available	300	0	0	0
Expenditure				
Effect of decision from report	260	0	0	0
Expenditure				
Remaining budget	<u>40</u>	<u>0</u>	<u>0</u>	<u>0</u>

5.2 The effect of the decision

This scheme is funded by Transport for London (TfL) from the Council's 2016/2017 Local Implementation Plan allocation. A decision to proceed will result in that allocation being spent partially or wholly.

5.3 Risks

There is a risk that if the current scheme for north-east 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.

5.4 Options

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

5.5 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: Zulf Darr, Interim Head of Finance, Place and Resources.

6. COMMENTS OF THE COUNCIL SOLICITOR AND MONITORING OFFICER

6.1 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.

6.2 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 for and on behalf of Jacqueline Harris-Baker, Acting Council Solicitor and Acting 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.

CONTACT OFFICER: Mike Barton-Service Manager Highway Improvement x61977
Sue Ritchie-Senior Engineer Highway Improvements x63823
Waheed Alam-Traffic & Highways Engineer x52831

BACKGROUND PAPERS: Delegated officer report titled '*North-East Croydon Area-Wide 20mph Speed Limit (Community Engagement Results)*'

APPENDICES: Appendix 1 – 20mph Area 2 Representations and Officer responses
Appendix 2 – Traffic Management Order and Scheme Drawing
Appendix 3 – Public Notice

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Objection 1

I have just heard that more 20MPH are to be imposed in croydon area. I have two children at school at the,Brit school, I wish my objection to this planning to be noted.

20 mph is an unreasonable speed as any milage above 30 is also unreasonable. The millage is hard to maintain a constance and to me it just feels like you adding to the congestion problems as well as increasing your profits on fine. The later probably being the reason behind this stupidity.

Officer Response

There is evidence that a 20mph speed limit –if adhered to – reduces the risk of road accidents occurring and presents a strong likelihood of avoiding fatal or serious injuries when one does occur.(**insert source**) 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.

Congestion and the resultant possible increase in journey times / air pollution are often cited as problems and an argument to keep the status quo. Both these issues are dealt with in the below response.

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 should be regarded as a means of access to and from the main road network and therefore are 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 basic principles and the functions of the hierarchy of roads is accepted, it follows that any potential extra delay as a result of the proposed 20mh speed limit is only attributable 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).

In reality, 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 travelling at 20mph will have become fully stationary whilst the car travelling at 30mph will still be moving at 22mph.

This section deals with the objection that a lower speed limit will result in 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 was 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 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.

Objection 2

Ref:PD/CH/A32 (20moh speed limits)

Dear Mr Barton,

I object to this measure being imposed on the simple grounds that it unnecessary, intrusive and there are better things on which Croydon Council could be spending our money.

This measure must certainly not be imposed before full details of the scheme has been forwarded to every individual resident affected and sufficient time has been allowed for posted responses (as with attempted recent parking scheme) to be fully considered.

Part 2 of The Local Authorities' Traffic Orders (Procedures) (England) Regulations 2012 states:

Consultation 7.—(1) Before making an order, an order making authority must consult—

- (a) any other local authority in whose area a road or place to which the order applies is situated;
- (b) such other persons or organisations appearing to it to be likely to be affected by the making of the order;**
- (c) such persons or organisations appearing to it to be representative of such persons; and
- (d) such other persons or organisations as, having regard to the provisions of the order and its likely effect, it thinks appropriate.

Although you have informed the local residents Association (ASPRA), the Council knows very well that only a small fraction of local residents belong to this organisation. Therefore **it is surely required by law that you follow part (b) of the government directive and achieve a clear majority of local residents in favour of your proposal before proceeding** with this expensive exercise.

I also refer you to Section 8(b) of the same regulations;

(2) A notice of proposals must be published in such ways and such number of times as the order making authority considers appropriate for the purpose of informing persons likely to be affected by the making of the order.

Yourselves, as the order making authority might consider that informing ASPRA of your plans is sufficient. Those who are not members will surely disagree. The words "must consult" in the preamble to these sections weighs definitively in

Representations	Appendix 1
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favour of informing ALL affected persons directly as the dominant requirement placed on Croydon Council regarding this proposed initiative.

As this requirement has not yet been met by it is surely necessary for the Council to extend its period of investigations well beyond the August 24th deadline set to give time for the regulations to be adequately implemented. It is also necessary to extend this time period because a substantial fraction of local residents are on holiday during the month of August. It appears that, from the outset, this quasi-Survey was ill-conceived and inadequate to the demands of its required protocols.

I request that the Council revise its schedule, inform ALL residents of your plans and give a more reasonable time period for electors' responses to be considered and implemented or not, as the case may be.

Officer Response

This objection is mainly focussed on that the council's consultation procedures were not sufficient to meet the statutory requirements. This is not accepted and the procedures which the council followed are below. The reference to the Resident Association 'ASPRA' and the misunderstanding that somehow the council informed this particular Resident Association of the statutory consultation and not others is incorrect. This is explained towards the end of this officer response.

During April/May 2016 the council carried out a 'community engagement' (CE) with residents/businesses in north-east Croydon in order to determine whether or not the proposed maximum 20mph speed limit in the area had or did not have the support of the local people. In order to publicise the CE, the council delivered 32,420 newsletters to all properties in the area where the 20mph speed limit was proposed. The newsletter explained the scheme proposal, the importance of their response, the website address providing further scheme proposal details, a timetable/ programme of what would happen following the CE. Within the timetable, it was informed that if the CE showed that the majority of respondents were in favour of the change, a statutory consultation would be proceeded with during July/August 2016. At least six weeks were allowed for the public to respond to the CE which ended on 20 May 2016.

Following the determination by the council that the majority (50.5%) of responses in the North-East area were in favour of the proposal (see 3.1.5 of the main report), the council initiated the statutory consultation in July 2016.

Although regulations only require a 3 week consultation period at the statutory stage, Croydon council gave four clear weeks for members of the public to respond with any objections. This objection together with the others given in this Appendix are in response to the statutory consultation.

Regulations require a local authority to publish a 'Notice' in a local paper of their intention to make the relevant Traffic Management Order. This notice is also published in the London Gazette. This notice appeared on Wednesday 27 July 2016. Although not required, the council posted in excess of 4000 Public notices throughout the area on existing lamp columns. These were posted in every street which is within the north-east Croydon area. The scheme website was updated to reflect the fact that the 'statutory consultation' for the North-east Croydon 20mph proposal was underway.

The council wrote to various organisations inviting them to write in should they have any objections to the proposal. The Metropolitan Police were asked for their comments and they provided a 'No Objection'.

To suggest that the public were not properly informed at any stage is incorrect.

The objector is mistaken that the council engaged with ASPRA to inform the Resident Association of the statutory consultation but no others. During the community engagement (informal consultation) 'ASPRA' had contacted the council requesting paper copies of the scheme information and questionnaires which they wished to distribute to their Association members. This request was fulfilled just as were requests from anyone else that may have requested paper copies. A handful of questionnaires were returned from ASPRA members during the CE period some of which were in favour of the scheme whilst others were opposed to it. The returns were included in the make up of the results for 'north-east Croydon'.

Objection 3

I object to the Councils proposed 20 mph limits as it is impractical and will be expensive, wasting my council tax. You will not be able to enforce it without enormous amount of funding which will detract from much more needy projects. This ill thought out project is yet another example of councillors wasting money which is not theirs and pampering to left thinking environmental and political correct fascist thinking.

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 undertake road safety projects.

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 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.

Whilst the objection states that there are better ways to use available funding to improve road safety, none are identified for the council to comment on or 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 maximum 20mph proposal is also an important step forward which the current Labour administration sees appropriate as do so many other councils across the UK.

Objection 4

Dear Sir/Madam,

I write in respect of the above (reference PD/CH/A32) and would like to 'register my objection to the same.

Without any effective enforcement of the speed limit I do not believe that the scheme will yield the benefits that are being claimed.

Those law abiding drivers will adhere to the scheme but others who continue to flout the 30 mph speed restrictions will simply ignore the new limit. This will lead to more aggressive driving by such individuals who will feel their progress is being impeded by the law abiding drivers and will try and make up for the lost time by speeding even more. This will also lead to greater instances of tailgating and potential for conflict to arise.

At a time when the council's finances are under great strain I do not believe that the expense involved in implementing such a scheme is the best use of the limited money that the council has at its disposal.

In the circumstances, I trust the council will not proceed with this scheme particularly as the support for it cannot be said to be overwhelming.

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 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.

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 undertake road safety projects. This funding cannot be used for providing council services other than those related to road safety. As this is funding provided for by Transport for London for use to improve road safety, it should be noted that the spend on this project, does not require council services to be cut elsewhere.

Objection 5

Dear Sirs,

I wish to object to the proposed speed limit on the following grounds:

- 1. Inadequate consultation.** The consultation was confined to those having addresses within the area and the interests of others using the roads such as delivery men, tradespeople and those having to pass through the residential roads because of congestion on the main roads were not able to be represented. This was despite the mention of groups representing drivers in paragraph 87 of Department for Transport circular 01/2013. In this connection it is worth noting that, despite being ineligible, 381 people from outside the area took the trouble to respond and their votes were more than 2 to 1 against. Had they been allowed they would have tipped the balance against the proposal.
- 2. Inadequate publicity of opportunity to object.** One notice in The Guardian and notices on lampposts are quite inadequate to tell people of their right to object. It was just the opposite of the effort put into the original consultation. I only found it inadvertently when looking for material to write a paragraph for our Residents' Association newsletter.
- 3. The limits will be ineffective.** The Department for Transport's own circular (paragraph 95) admits that signed-only 20 mph speed limits generally lead to "only small" reductions in traffic speeds. My own experience in many 20 mph areas is that they have no effect at all and simply serve to bring speed limits generally even more into disrespect.
- 4. No enforcement.** We are told that the police will apply the same level of enforcement as they do to 30 mph areas. Since the police now seem to rely almost 100% on speed cameras this means that police enforcement will be effectively non-existent.

5. **Goes against ACPO evidence.** In their evidence to the recent consultation on the revision of the speed limit circular, the Association of Chief Police Officers ("ACPO") commented that they support road safety measures that influence drivers into slower speeds, especially in predominantly residential areas, but that in each case there must be a proven need for a 20 mph zone or limit, the limit must be clear and the motorist must have the ability to comply. They consider that zones and limits have to be self-enforcing with the implementation of engineering measures which physically ensure driver compliance. ACPO also believes that the roads authority must be responsible for ensuring that it meets these aims. They do not support large-scale 20 mph limit over a number of roads.
6. **No comparative cost-benefit analysis.** I have seen no evidence that there has been any cost-benefit analysis to consider whether the cost of this proposal could be better spent in other ways to improve road safety.

I would like to just add that, should the Council wish to go ahead with this proposal despite all the objections, they should at least wait to make a decision until they have had time to see the scheme in operation in Zone 1 to see whether it really produces the hoped-for benefits.

Officer Response

The objections are addressed in the same order under the same headings as that shown in the objection.

1. Inadequate consultation

This part of the objection relates to the 'community engagement'. During April/May 2016 the council carried out a 'Community engagement' with residents/businesses in north-east Croydon in order to determine whether or not the proposed maximum 20mph speed limit in the area had or did not have the support of the local people. In order to publicise the Community Engagement, the council delivered 32,420 newsletters to all properties in the area where the 20mph speed limit was proposed. The newsletter explained the scheme proposal, the importance of their response, the website address providing further scheme proposal details, a timetable/ programme of what would happen following the Community Engagement. Within the timetable, it was informed that if the CE showed that the majority of respondents (50.5%) were in favour of the change, a statutory consultation would be proceeded with during July/August 2016. At least six weeks were allowed for the public to respond to the Community Engagement which ended on 20 May 2016.

It is usual practice that for all forms of consultations regarding highway changes (other than statutory consultations), the views of those living in the streets affected are considered as most important in preliminary decision making. Rules and regulations need to be set before the start of any

engagement just as was done prior to the start of the community engagement for north-east Croydon. The community engagement terms of engagement were agreed by Cabinet in 2015. Cabinet agreed that for any of the areas of Croydon where an informal engagement was to be carried out, only those that have an address within the area under consideration would be eligible to give their opinion at this first stage. Of course, for the second stage (statutory consultation), the rules and regulations are set by. allows anyone wishing to object to the Notice of a Traffic Management Order to do so (see next section). All objections must be considered at this second stage.

2. Inadequate publicity of opportunity to object.

The second objection relates to the level of publicity which the council carried out for the statutory consultation. The objection is that a notice in the local press and public notices placed throughout the area affected was inadequate to tell people of their right to object at this second stage. This is not accepted for the reasons given below.

During the community engagement, 32,420 newsletters were delivered to each of the properties in the affected area not only inviting their informal view but also detailing the full process and timescales on how and when the council would proceed following the CE period. This included details about the possible statutory consultation and that if proceeded with, would be commenced in July. The council also set up a dedicated webpage www.croydon.gov.uk/20mph which contained details of the scheme, Frequently asked Questions booklet which attempted to answer some of the more common questions which the public may have had regarding the proposal and process. Following the determination by the council that the majority of responses (50.5%) in the CE were in favour of the proposal, the council initiated the statutory consultation in July 2016.

Although regulations only require a 3 week consultation period at the statutory stage, Croydon council gave four clear weeks for members of the public to respond with any objections. All received objections are given in this this Appendix of which this is one.

Regulations require a local authority to publish a 'Notice' in a local paper of their intention to make the relevant Traffic Management Order. This notice is also published in the London Gazette. This notice appeared on Wednesday 27 July 2016. Although not required, the council posted in excess of 4000 Public notices throughout the area on existing lamp columns. These were posted in every street which is within the north-east Croydon area. The scheme website was updated to reflect the fact that the 'statutory consultation' for the North-east Croydon 20mph proposal was now underway.

The council wrote to various organisations inviting them to write in should they have any objections to the proposal. The Metropolitan Police were asked for their comments and they provided a 'No Objection'.

To suggest that the public were not properly informed at any stage is incorrect.

3. *The limits will be ineffective*

Consultancy firm Atkins carried out an evaluation of Portsmouth City Council's 20mph area wide scheme. It was found 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 for Portsmouth City council it is encouraging that where existing speeds are the highest, we can anticipate the greatest drop in speed following the implementation of the maximum 20mph speed limit.

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.

There is 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.

4. No enforcement

The Association of Chief Police Officers (ACPO) in its guidance in ‘**Section 1 – Introduction**’ states under paragraph 1.1.1

“The road policing ethos is to deliver a crucial protective service that engenders public satisfaction and confidence. Part of this service is to provide enforcement where:

- *A mandatory limit has been introduced;*
- *There is need for compliance;*
- *The speed necessary is clear to all drivers using the road; and*
- *Some decide to ignore the limit and road safety benefit achieved through compliance.*

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 for north-east Croydon. The Police have been clear in their position that their enforcement efforts of a 20mph speed limit 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.

5. Goes against ACPO evidence

The Recommendation does not go against ACPO evidence.

6. No comparative cost-benefit analysis.

A basic cost-benefit analysis was done and provided in the Frequently asked Questions relating to the scheme. The cost benefit analysis was based on the estimated cost for implementing a 20mph proposal for the full borough (estimated at the time to be £1.5 million). Since that time, and following the near completion of the implementation of the scheme for area 1 it is estimated that the actual cost to cover the full borough will be in the region of £1 million.

Given below is the extract from the FAQ’s based on the previous estimate of £1.5 million.

FAQ number 18: How much will it cost and is it worth it?

In order to consider the maximum 20mph proposal for the whole of Croydon, it was necessary to split the borough into five approximately equal areas with

each being considered in turn. It is estimated that each area will cost approximately £300,000 to implement. Assuming that all areas in the borough will support the proposal, to cover the whole borough the cost will be in the region of £1.5 million. Taking the average cost of a collision as £68,320 (DfT, 2010), the cost of covering the full borough, approximately equals the cost which would be associated with just 22 accidents.

There are also significant financial savings (eg, costs to the NHS) that will come with the health benefits if more people choose to walk or cycle as a result of the scheme, because these people will have more active life styles. Air quality will also improve if there are fewer vehicles on these roads. There are, however, no cashable benefits to the council where implemented. This new approach will be much more cost efficient over time than the previous programme of rolling out 20mph zones and limits in a small number of streets at a time due to economies of scale.

Objection 6

I strongly object to the proposed 20 mph speed limit in the area it will cause increased traffic congestion and will not solve the speeding problems.

Officer Response

This objection is based on the issues of possible increased congestion and non-compliance of the proposed 20mph speed limit. The two negative effects which often come to mind as a result of congestion are an increase in journey times and the possibility of an increase in air pollution. Although, the likelihood of any noticeable congestion is unlikely, these two issues have been addressed below.

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 will continue to cater for through-traffic. If these facts are accepted, 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 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).

In reality, 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.

The other negative effect if there is an increase in congestion is the possibility that air quality may worsen.

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 for north-east Croydon. The Police have been clear in their position that their enforcement efforts of a 20mph speed limit 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.

The Association of Chief Police Officers (ACPO) in its guidance in '**Section 1 – Introduction**' states under paragraph 1.1.1

“The road policing ethos is to deliver a crucial protective service that engenders public satisfaction and confidence. Part of this service is to provide enforcement where:

- *A mandatory limit has been introduced;*
- *There is need for compliance;*
- *The speed necessary is clear to all drivers using the road; and*
- *Some decide to ignore the limit and road safety benefit achieved through compliance.*

Objection 7

I oppose these restrictions on the following points.

1. Limited evidence that 20mph significantly reduces accidents
2. Increased exhaust pollution.
3. Difficult to enforce.
4. Road rage
5. The lowest speed limit in statutory UK is 30mph.

Officer Response

Taking the points raised in the Objection in turn:

1. There is 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.

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.

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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.

2. 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.

3. 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 for north-east Croydon. The Police have been clear in their position that their enforcement efforts of a 20mph speed limit 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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- *The speed necessary is clear to all drivers using the road; and*
- *Some decide to ignore the limit and road safety benefit achieved through compliance.*

4. Road rage is a subjective matter and manifests itself on all types of road irrespective of speed limit. It is usually in response to individual interactions between road users, or in frustration to delays or obstruction. There is anecdotal evidence of “tailgating” by drivers who do not want to travel at the legal speed limit but this is by no means restricted to areas where 20mph speed limits are in force. In residential roads average speeds of 20mph and below are quite typical where the current 30mph limit is in force and it is not believed that introduction of a 20mph limit will cause a significant increase in journey times. Consequently road rage through delays is not thought to contribute to road rage via delays to motorists. Officers are of the

view that introduction of a 20mph limit would not significantly affect the amount of road rage experienced.

5. Statutory speed limits are set according to the type of road one is driving on and its individual characteristics.

As a guide, unless signs state otherwise, the following speed limits apply to car drivers

- Dual carriageways – 70 mph
- Single carriageways – 60 mph
- Street-lit carriageways – 30 mph

These are the maximum allowable speeds one should drive at; and these maximums should not be viewed as a target to aim towards.

Traffic Highway Authorities are empowered to set a lower/higher maximum speed limit by law and the objector is mistaken by saying that 30mph is the lowest statutory maximum speed limit.

Objection 8

Proposed 20 MPH speed limit North-East Croydon

I am writing regarding the introduction of the above to the areas indicated in Schedule 1 – Area 2.

I OBJECT to this imposition as I believe it to be unenforceable.

I have frequently driven along the roads in the SE 20 area that are designated 20mph and my experience is that very few drivers keep to that speed restriction, not even the buses!

Last week I was driving along Shirley Church Road, Shirley when I was overtaken by a car travelling at approximately 40mph. This car continued at that speed for almost the whole length of this road driving on the **WRONG SIDE OF THE ROAD**. It nearly hit an elderly pedestrian, who naturally wasn't expecting a car to be approaching him in the opposite lane to the one in which it should have been travelling. This incident of dangerous driving and speeding took place despite the speed bumps and raised platform outside Shirley High School. Do you really expect the irresponsible drivers, such as this one, to adhere to a lesser speed limit, when they find it impossible to drive at 30mph?

How is the 20mph speed limit going to be enforced? It has been suggested that the average motorist will travel at roughly 26 mph in areas with such restrictions. Is the cost involved in installing new traffic and road signs for a reduction of probably no more than 4 miles an hour, actually worth it? Especially, if there are few prosecutions to deter offenders who ignore speed regulations.

Most traffic accidents happen on main roads, i.e. the roads such as the Wickham Road, where the 20mph limit will NOT be introduced. Driving at a reduced speed is not going to reduce accidents and there are no statistics that suggest that 20mph limits result in improved road safety.

No doubt the Council is going to say that it has had little response to this second stage of the consultation and so, people must be in favour. Firstly, I would point out that this stage is taking place in August, when a great many people are on holiday. More importantly, I would suggest that posting Public Notices on lampposts is an entirely inappropriate way of advertising such a major change. Only pedestrians are able to read such Notices and it appears that few do. The Department of Transport's Guidance for New Procedures for Traffic Orders states in Table 4.3 that posting Public Notices on lampposts is unsuitable for advising passing motorists. No one that I have spoken to is aware that there is a second stage to the consultation or that they can comment, not even those who walk or cycle!

For all the reasons above, I object to the introduction of the 20mph speed limit AND I believe the process by which it is being presented to the public to be flawed.

Officer Response

The proposed maximum speed limit is to have the relevant Traffic Management Order and necessary signage put into place and this will make the maximum 20mph speed limit enforceable by law. Enforcement of speed limits is carried out by the Metropolitan Police across London.

The Police have been clear in their position that their enforcement efforts of the speed limit 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 likely to be at sites where there is a real and persistent problem.

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- *Some decide to ignore the limit and road safety benefit achieved through compliance.*

The sort of incident which the objector has cited as happening in Shirley Road is not something which the council claims will stop from happening automatically as a result of a new lower speed limit however neither can one say that this action is somehow unenforceable.

The objector appears to accept that the new speed limit could see motorists speeds come down to around 26mph. Although officers believe that speed reductions could be greater, even an average speed of 26mph would result in significant benefits.

Consultancy firm Atkins carried out an evaluation of Portsmouth City Council's 20mph area wide scheme. They concluded 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.

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.

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.

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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 objection also asks whether a small reduction in speeds will be worth the finances spent on the scheme. This is explained as follows:

A very basic cost-benefit analysis was done and provided in the Frequently asked Questions relating to the scheme. The cost benefit analysis was based on the estimated cost for implementing a 20mph proposal for the full borough (estimated at the time to be £1.5 million). Since that time, and following the near completion of the implementation of the scheme for area 1 it is estimated that the actual cost to cover the full borough will be in the region of £1 million.

Given below is the extract from the FAQ's based on the previous estimate of £1.5 million.

FAQ number 18: How much will it cost and is it worth it?

In order to consider the maximum 20mph proposal for the whole of Croydon, it was necessary to split the borough into five approximately equal areas with each being considered in turn. It is estimated that each area will cost approximately £300,000 to implement. Assuming that all areas in the borough will support the proposal, to cover the whole borough the cost will be in the region of £1.5 million. Taking the average cost of a collision as £68,320 (DfT, 2010), the cost of covering the full borough, approximately equals the cost which would be associated with just 22 accidents.

There are also significant financial savings (eg, costs to the NHS) that will come with the health benefits if more people choose to walk or cycle as a result of the scheme, because these people will have more active life styles. Air quality will also improve if there are fewer vehicles on these roads. There are, however, no cashable benefits to the council where implemented. This new approach will be much more cost efficient over time than the previous programme of rolling

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

The objection states 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 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, 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 objector anticipates that the council will likely rely on a lack of response at the statutory consultation stage to say that this means that people support the proposal. This is unfounded and has no basis. The level of support for the proposal was gauged through the 'Community Engagement' which was carried out April/May 2016 and before this statutory consultation. The community engagement showed that the majority of respondents supported the proposal and based on that response the council decided to proceed with the statutory consultation.

A statutory consultation is to provide an opportunity for people to raise any valid objections as to why the Traffic Management Order should not be made. It is not to gauge the level of support or opposition but rather to address any valid objections that may be received.

The assertion that the statutory consultation was deliberately carried out over a period when people would be on holiday so as to receive a low response is also incorrect. The 'community engagement' newsletter was delivered to 32,420 properties in the area in May 2016, within which a clear timetable was provided explaining that the statutory consultation may be carried out during July/ August. Also in light of the fact that some individuals may be away on summer vacation, the council provided more than 4 weeks (over and above the minimum 3 week statutory period required) to provide objections within.

Placing public notices throughout the area informing passers-by of the statutory consultation is the normal procedure for publicising the Traffic management order. This is over and above the minimum requirements which is to publish a notice in the press and the London Gazette.

The council also had all this information on its website.

Objection 9

20160823 Order Marking Section.wpd

23 August 2016

Order Making Section
 Parking Design Team
 Place Department
 Croydon Council
 Floor 6, Zone C
 Bernard Weatherill House
 8 Mint Walk
 Croydon, CR0 1EA

PD/CH/A32 - The Croydon (20mph Speed Limit) (No. A32) Traffic Order 20

Dear Sirs

I write to OBJECT to the proposed BLANKET 20 MPH SPEED LIMIT across North-East Croydon (Area 2). I understand that such a Traffic Order has already been passed for the North of the Borough (Area 1) and it is proposed to extend this BLANKET SPEED LIMIT to the rest of the Borough.

I am a pedestrian, car driver and public transport user. Which mode of transport I use is dependent on need so this proposed speed limit will affect all three of my current ways of moving about.

The Council's Committee have list three reasons for imposing such a BLANKET speed limit.

1. To improve road safety.

The recorded casualties on Croydon's roads within the area of the No. A32 Traffic Order 20 for 2015 are as follows.

(A32) - Area 2, Traffic Order 20 - 2015 Casualties on 20mph speed limit area roads				
	Slight	Serious	Fatal	
Pedestrian Casualties	9	0	0	
Child Casualties	8	0	0	
Motor Car/ Tram Occupant	15	0	0	
Pedal Cycle Involved	2	0	0	
Motorcycle Involved	4	0	0	
Total Number of All Types	37	0	0	

1

(A32) - Area 2, Traffic Order 20 - 2015 Casualties on 30mph retained roads				
	Slight	Serious	Fatal	
Pedestrian Casualties	20	4	0	
Child Casualties	4	0	0	
Motor Car Occupant	21	2	0	
Pedal Cycle Involved	7	0	0	
Motorcycle Involved	14	0	0	
Total Number of All Types	66	6	0	

66% of Casualties in 'Area 2' occurred on roads that will be retained as 30mph speed limit roads and 34% on roads that will be within the blanket 20mph speed limit area.

The fifteen Casualties shown against 'Motor Car/ Tram Occupant' in the above table includes tram passenger casualties which occurred in three separate accidents involving trams.

Three of the 'Child Casualties' in the above table occurred in a section of road that has an existing 20mph speed limit. Therefore, these accidents would not have been prevented under the proposed blanket 20mph speed limit.

(A32) - Area 2, Traffic Order 20 - Accident Locations in proposed 20mph Area					
Road Junction	Straight Road	within a cul-de-sac	Involving a bus Straight Road	Involving a tram Straight Road	Totals
28	2	1	3	3	37

76% of the accidents within the proposed 20mph area occurred at road junctions. Road junction accidents generally are caused by one of the parties failing to take due care when approaching a road junction or due observation when turning at a road junction. Only driver retraining and testing will reduce this type of accident a 20mph speed limit will only limit the damage caused by the impact.

8% of the accidents occurred on Addiscombe Road and involved trams. This road is shared with trams and all other road users so there is a high risk of an accident occurring if driver, car lorry, motorcycle and pedal cyclist do not take due care. A 20mph speed limit would have little affect in reducing accident rates in this area.

The question that now should be asked is will a BLANKET 20 MPH speed limit in 'Area 2' reduce this casualty figure of 37. I would agree that if one life could be saved it would be a good thing and worth while considering such a scheme. However, would a more targeted approach achieve the same outcome or even a better result?

Reducing the speed limit in some locations, such as around schools, hospitals and shops, where both pedestrians and vehicle operators, may have their minds on other things or are being distracted in some way, may reduce accidents. Additionally, introducing speed controls on minor roads that are currently used as short cuts between 'A' roads or to get around congestion points on the 'A' roads could help in the reduction of accidents. This type of approach would be much preferred to a BLANKET approach.

We currently have a 30mph limit on our roads. However, we have all been passed by some car, van, motor-cyclist or lorry travelling over 30mph and at times approaching 50mph, many times.

The national averages in the UK for Vehicle speeds in Built-up Urban Areas with a 30mph speed limit are as follows:-

		Under 30mph	30 to 40mph	over 40mph
Motorcycles	:-	53%	39%	8%
Cars	:-	55%	41%	4%
Buses	:-	74%	24%	2%
Light Goods	:-	52%	44%	4%
HGV's	:-	56%	40%	4%

A 20mph limit would not mean that the 58% average currently driving below 30mph would all drive at below 20mph nor that the 37.5% average currently driving between 30 to 40mph or the 4.4% average driving at over 40mph would all start driving within the new 20mph speed limit. If the Traffic Management Advisory Committee (TMAC) and the Executive Director of Place are of the opinion that it would, then they do not have any understanding of Traffic Management.

The current speed limit cannot be policed so what are the chances of a 20mph BLANKET limit being enforced. The answer is NONE.

Pedestrians, especially the elderly and children, and maybe other road users, could be lulled into a false sense of security if a BLANKET approach were to be applied. Accident rates could easily increase rather than fall.

The Streets & Environment Scrutiny Committee in their Report on the 20mph limit have stated that the 20mph BLANKET speed limit is more cost affective and so, should be adopted as a TARGETED 20mph approach would be more expensive. If the Council are talking about saving lives and reducing serious injuries, then costs SHOULD NOT be taken into account at the onset.

If a targeted approach to reduce the accident rates were to be used, using modern cameras and speed sensor technology, 20mph speed limit areas could be set up and the speed limit policed at the same time. Though the initial set up cost may be higher such a scheme would become self funding if drivers exceeded the 20mph limit. I would hope that in time the income from fines would reduce, which would show that the traffic management design scheme was working.

With a unpoliced 20mph blanket scheme one would not know if the scheme was meeting its targets.

The proposed “20mph BLANKET Speed Limit” is a poor traffic management design scheme that is ill-considered and matters outside the design box have not been taken into account or even thought through.

The Committee also states in their Report that the “*Consultation on the proposals should not be based on road safety considerations only.*” Presumably this statement was made because the Committee could not state categorically that a BLANKET 20mph limit would result in safer roads and/or less casualties.

2. To encourage walking and cycling.

The encouragement of walking and cycling is a worthy aim along with any other form of physical exercise. However, imposing a 20mph BLANKET speed limit to achieve this is illogical.

We have become a nation of car users, we no longer walk to the local shops, parents drive their children to and from school, people going to work get driven to and from their main public transport point and why walk to the local post box when you can drive? A 20mph speed limit will NOT stop this attitude.

Pedestrians appear to have adopted an attitude of I can walk out into the road and drivers will stop or go around me. Pedestrians appear to have their minds on other things (talking on a phone or listening to music) when crossing roads.

How many times have you seen a parent push a pushchair out into a roadway in order to get traffic to stop to let them cross? Pedestrians cross roads by walking out from between two parked cars putting themselves and others at risk. All this can happen within 10m of a safe crossing point.

I am all for encouraging walking but ways must be found to change the mind set of both current pedestrians and new ones. Each of us is responsible for our own safety and for the safety of others through our actions. This must be made clear to ALL.

A 20mph speed limit on the roads will NOT prevent Mr Jones from getting his wife to drive him to and from the station; Mrs Smith will still drive to and pick up her children from school and people will still drive to the local shops.

To stop this and to get people walking you will have to educate the population of Croydon in the ways of getting around without private transport and that will not be an easy job.

I am all for encouraging cycling as it is a clean and cheap form of transport. However, you cannot just say ‘get on your bicycle’. If there was a 20% increase in cycling on our current road network there would be a disproportionate increase in road casualties. This is confirmed by Central London experience where it has been found that in order to provide safe cycling it has been necessary to undertake major improvements to the existing road system to segregate cyclists and motor vehicles, ie. dedicated cycling routes.

If the aim of the 20mph speed limit is to increase cycling then the existing road network must be improved first so that it is safe for cyclists. The improvement cannot be ignored and only carried out after the accident rate has increased and there have been a number of fatalities.

A percentage of cyclist do not use the roads in a safe manor, passing through red lights, making left and right hand turns ignoring pedestrians and ignoring pedestrian crossing locations. Although this can also be said about car and lorry drivers.

The cycling standard will have to be improved through education and testing so as to ensure that cyclists obey the current Highway Code. They need to learn that they are responsible for their own safety and their actions affect the safety of others. This applies to all road users and not to just cyclists.

The current 20mph BLANKET speed limit proposal would not work without also including the high cost of undertaking road improvements to provide safe passage for both pedestrians and cyclists.

3. To improve the local environment.

In the published Newsletter it is stated that *“The highway in residential areas is considered to have a wide range of functions, in addition to movement of traffic. These streets should be a pleasant and safe place for people to walk, meet and socialise. A reduction in traffic speed should help to encourage the use of streets for all these functions.”*. The first two sentences of this statement have been quoted by both Town Planners and Architects in relation to new town developments or medium to large redevelopments of existing towns.

Though this is a good objective it is one that is virtually impossible to achieve within a town that has evolved since the nineteen twenty’s when this concept of town planning did not exist. The only exceptions are purpose built developments of the early 1900s such as Hampstead Garden Suburb and the Bournville Village. To achieve this aim you would need wider footpaths, trees and grass verges to encourage people to walk, meet and socialise. A 20mph BLANKET speed limit will NOT contribute in any way in meeting this objective.

There are parts of the Borough where such local environments exists; where there are communities that value the local character of their area, who meet and socialise with their neighbours and will fight to retain such an environment. I am pleased to see that the TMCA would like to see such an environment in all parts of the Borough. However, it is such a shame (ignominy)that at the same time as promoting this as a reason to approve a 20mph speed limit, the Deputy Leader (Statutory) & Cabinet Member for Homes and Regeneration has decided that those areas which already have such an environment should be demolished and redeveloped. Thus changing them into the sort of local environments that the TMCA deems unacceptable. It is hypocritical for the Council to try and convince the Croydon electorate that this reasoning works for both scenarios.

The Streets & Environment Scrutiny Committee’s Report states that a 20mph speed limit will reduce noise and pollution thereby giving a improved local environment.

There are four main types of harmful emissions from motor vehicles:-

VOC	:-	Volatile Organic Compound
PM	:-	Particle Matter
CO2	:-	Carbon Dioxide
NOx	:-	Mono-nitrogen Oxides NO and NO2

According to the Highways Agency's figures, at 30mph average CO2 emissions for vehicles (including 10% Heavy Goods Vehicles) stands at 188g/km, whereas at 20mph this rises to 221g/km, an increase of 17.6%.

DfT's ; Basic Local Authority Carbon Tool - predicts increases in CO2 emissions of around 20% as a result of average speeds being reduced from 30mph to 20 mph.

If one takes an average, with a 20mph BLANKET speed limit Croydon's air quality will be worse once a 20mph speed limit is introduced with CO2 emissions increasing by 18.8%. Such an increase will have a detrimental effect on the health of children, the elderly and all adults with respiratory health problems.

This will increase the NHS costs as they will have to deal with an increase in respiratory health problems generated by such an ill considered traffic scheme.

As I have stated in a preceding section, if one life could be saved by a traffic management design scheme, even a "20mph BLANKET speed limit" it would be worth considering. However I am of the opinion that a more targeted traffic management scheme would be a much better approach. Such a scheme would achieve a reduction in accident rates and would not have such a detrimental effect on the air quality in Croydon.

I strongly **OBJECT** to the proposed Traffic Order and wholeheartedly believe that this Order should be rejected by.

Yours sincerely

Officer Response

This objection debates three points which have been addressed in this officer response, They have been addressed under the headings as put forward by the objector:

Road safety

The council has not proposed a blanket 20mph for all roads within the area two, but actually proposed to retain the current speed limit on major roads within the area. Based on research by many organisations and experience from other areas in the UK that have implemented area wide 20mph limits, the council believes and supports the idea that a change in the speed limit for the less strategic roads would result in improved road safety. It does not claim that a lower speed limit will eradicate accidents from the area but supports claims that impacts at lower speeds will go some way in ensuring that damage (to property and individuals) is reduced.

It is beyond the requirements to verify the statistics regarding accidents/injuries etc provided in the various tables in the objection letter however, in addressing the objections they have been considered as correct.

It appears from the table 1, the objector has found that within the roads where the council is proposing a 20mph speed limit, there were eight child casualties. The objector states that three of them were on roads which actually had a current 20mph speed limit already on them implying that the other five were roads where the speed limit was 30mph. There is nothing to suggest what speeds the actual vehicles were travelling at nor the level of injuries sustained by the children.

The Royal Society for the Prevention of Accidents (RoSPA) on their website report of an analysis of vehicle speed in pedestrian fatalities in Great Britain, found that 85% of pedestrians killed when struck by cars or car-derived vans, died in collision that occurred at impact speeds below 40mph, 45% at less than 30 mph and 5% at speeds below 20 mph.

The risk of a pedestrian who is hit by a car being killed increases slowly until impact speeds of around 30 mph. Above this speed, the risk increases rapidly, so that a pedestrian who is hit by a car travelling at between 30 mph and 40 mph is between 3.5 and 5.5 times more likely to be killed than if hit by a car travelling at below 30 mph. However, about half of pedestrian fatalities occur at impact speeds of 30 mph or below. Elderly pedestrians have a much greater risk of suffering fatal injuries than other age groups.

It also reports that on 30 mph roads in built-up areas, 45% of car drivers exceed 30 mph and 15% exceed 35 mph. It refers to research suggesting there are three types of drivers:

- Compliant drivers who usually observe speed limits (52% of drivers)

- Moderate speeders who occasionally exceed speed limits (33% of drivers)
- Excessive speeders who routinely exceed speed limits (14% of drivers)

However, even the moderate speeders exceed 30 mph limits fairly regularly. Excessive speeders normally ignore the 30 mph limit, and often by a wide margin.

Applying the above findings to a lower speed limit of 20mph, if 52% of drivers observed the speed limit and 33% occasionally exceeded the 20mph speed limit, this would be regarded as a reasonable level of compliance without any intervention from the Police. Of course one would expect that those who regularly break the speed limit and by a wide margin will face enforcement action. This information plus much more can be found on the RoSPA website at the following web address.

<http://www.rospa.com/road-safety/advice/drivers/speed/inappropriate/>

Consultancy firm Atkins carried out an evaluation of Portsmouth City Council's 20mph area wide scheme. They concluded 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.

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.

As stated in Officer response at 4.3 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 proposed maximum speed limit is to have the relevant Traffic Management Order put into place and this will make the maximum 20mph speed limit enforceable. Enforcement of speed limits is carried out by the Metropolitan Police across London.

The Police have been clear in their position that their enforcement efforts of the speed limit 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 likely to be at sites where there is a real and persistent problem.

The Association of Chief Police Officers (ACPO) in its guidance in '**Section 1 – Introduction**' states under paragraph 1.1.1

“The road policing ethos is to deliver a crucial protective service that engenders public satisfaction and confidence. Part of this service is to provide enforcement where:

- *A mandatory limit has been introduced;*
- *There is need for compliance;*
- *The speed necessary is clear to all drivers using the road; and*
- *Some decide to ignore the limit and road safety benefit achieved through compliance.*

Walking and Cycling

It is difficult to understand the objection relating to 'walking and cycling' which is contained within the representation because the objector appears to support both these healthy forms of mobility. The objection does however state that imposing a 20mph blanket speed limit to encourage walking and cycling is illogical. From this, it would appear that the objector has misunderstood the main reason for introducing the 20mph speed limit is to actually increase road safety for all. Any positive benefit which results from an increase in road safety should be commended but not taken as the primary or sole reason for the introduction of the 20mph speed limit. More cycling and walking are just two of such factors which can be anticipated from a scheme such as an area-wide 20mph speed limit.

RoSPA on its website state;

“RoSPA advocates the Safe System Approach, which involves designing roads and vehicles to minimise the risk of crashes occurring, and ensures that when they do occur, they are unlikely to result in death or serious injury. 20 mph schemes are a good example of the Safe System approach because lower speeds reduce the risk of crashes occurring and the severity of any that do occur.”

It is true that road safety does not stop with the introduction of a lower speed limit and the council will continue its other efforts to ensure that our roads will continue to benefit from ever increasing road safety.

Local environment

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 was 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.

Objection 10

Dear Sir / Madam,

I think that 20mph as a speed limit is too slow, 25mph is a more practical speed. It is actually quite difficult to keep to 20mph, and you run the risk of drivers having to watch their speedometers so much that they pay insufficient attention to the road.

Officer Response

Driving requires a number of skills to be acquired amongst which two of the fundamental ones are being able to change into an appropriate gear and judge the vehicle speed without having to look at the gear lever or speedometer. Being able to drive safely at any given speed is essential to being a good driver and therefore being able to drive at 20mph should not be considered as something new, especially given that many London Boroughs are already 20mph areas.

Signs for a 25mph speed limit are not prescribed within current regulations. Also given that it is not uncommon for drivers to drive a little over the legal speed limit, many drivers would end up driving at around the 29-30mph mark if the legal speed limit was 25mph. Likewise, with a legal speed limit of 20mph it is expected that in practice drivers will probably drive a little over that speed. 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 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 but the difference between the two networks is significant. Whilst it may feel safe and practical from a drivers perspective 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.



CROYDON COUNCIL
TRAFFIC MANAGEMENT ORDER
20- No.Z32

The Croydon (20MPH Speed Limit) (No.A32) Traffic Order 20-

Made: 20-

Coming into operation: 20-

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.A32) 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;

(a) 1984 c. 27

(b) S.I. 2002/3113

(b) Nothing in this Order shall apply to:

Traffic Management Order	Appendix 2
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- (i) the roads bounding but not included in the area, as specified in Schedule 1 to this Order;
- (ii) those roads/sections of 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

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

Penge Road (from the borough boundary) , Goat House Bridge, High Street, Selhurst Road, Northcote Road, Whitehorse Road, Wellesley Road, Park Lane (between its junctions with Wellesley Road and Barclay Road), Barclay Road, Fairfield Road, Chepstow Road, Addiscombe Road, Shirley Road (between its junctions with Addiscombe Road and Wickham Road), Wickham Road (to the borough boundary at the south-eastern corner of No. 483 Wickham Road), and the borough boundary between the south-eastern corner of No. 483 Wickham Road and Penge Road.

SCHEDULE 2

Excluded roads within the 20mph speed limit area boundary

1. Addiscombe Road	10. Newgate
2. Addiscombe Grove	11. Park Hill Road
3. Blackhorse Lane (between its junction with Woodside Green and a point 18 metres south-east of that junction)	12. Portland Road
4. Cherry Road	13. St James's Road
5. Hermitage Lane (between its junction with Morland Road and a point 15 metres north-west of that junction)	14. Shirley Road
6. Long Lane	15. Spring Lane
7. Lower Addiscombe Road	16. Woodside Green (B243)
8. Manor Road	17. All roads/sections of road with an existing 20mph speed limit
9. Morland Road	18. All private roads

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.

PUBLIC NOTICE

CROYDON COUNCIL PROPOSED 20MPH SPEED LIMIT NORTH-EAST CROYDON The Croydon (20mph Speed Limit) (No.A32) 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/sections of 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 PD/CH/A32 by 24 August 2016.
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

Dated 27 July 2016, Mike Barton (Highway Improvement Manager, Place Department)

SCHEDULE 1 – 20mph speed limit area

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

Penge Road (from the borough boundary) , Goat House Bridge, High Street, Selhurst Road, Northcote Road, Whitehorse Road, Wellesley Road, Park Lane (between its junctions with Wellesley Road and Barclay Road), Barclay Road, Fairfield Road, Chepstow Road, Addiscombe Road, Shirley Road (between its junctions with Addiscombe Road and Wickham Road), Wickham Road (to the borough boundary at the south-eastern corner of No. 483 Wickham Road), and the borough boundary between the south-eastern corner of No. 483 Wickham Road and Penge Road.

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

Addiscombe Road	Newgate
Addiscombe Grove	Park Hill Road
Blackhorse Lane (between its junction with Woodside Green and a point 18 metres south-east of that junction)	Hermitage Lane (between its junction with Morland Road and a point 15 metres north-west of that junction)
Cherry Orchard Road	St James's Road
Portland Road	Shirley Road
Long Lane	Spring Lane
Lower Addiscombe Road	Woodside Green (B243)
Manor Road	All roads/sections of road with an existing 20mph speed limit
Morland Road	All private roads

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