

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

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.

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.*

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.

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 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.

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 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.

Representations	Appendix 1
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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	

(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.

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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.

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“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.