

REPORT TO:	Traffic Management Advisory Committee 9th February 2016
AGENDA ITEM:	12
SUBJECT:	North-Croydon Area-Wide 20mph Speed Limit (Statutory Consultation-Report on objections)
LEAD OFFICER:	Jo Negrini Executive Director - Place
CABINET MEMBER:	Councillor Kathy Bee Cabinet Member for Transport and Environment
WARDS:	South Norwood, Upper Norwood, Selhurst, Bensham Manor, Thornton Heath, Norbury and West Thornton
<p>CORPORATE PRIORITY/POLICY CONTEXT:</p> <p>This project addresses the corporate policies adopted in the Corporate Plan 2015-2018 to enable Growth, Independence and Liveability. This report helps address the Liveability strategy of the Plan with particular emphasis on the Transport vision to:</p> <ul style="list-style-type: none"> • Implement the 20-year Transport Vision to improve safety and access for all road users, particularly pedestrians, cyclists and people travelling by public transport. • Implement an area-wide 20mph maximum speed limit scheme across Croydon, on an area by area basis, subject to public consultation in each area. 	
<p>AMBITIOUS FOR CROYDON & WHY ARE WE DOING THIS:</p> <p>As part of Ambitious for Croydon, there are plans to improve the way that the council delivers on its roads and transport agenda, including :</p> <ul style="list-style-type: none"> • 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-Croydon is estimated to be £300,000. The cost of this proposal is to be met from the TfL allocation secured through the Local Implementation Plan (LIP) for 2015/2016.

KEY DECISION REFERENCE:

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

1. RECOMMENDATIONS

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

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

2. EXECUTIVE SUMMARY

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

3. DETAIL

3.1 BACKGROUND

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

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

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

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

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

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

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

3.1.6. STATUTORY CONSULTATION (objection common themes)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3.1.14. The scheme will increase journey times.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. STATUTORY CONSULTATION

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

5. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

5.1

1. Revenue and Capital consequences of report recommendations

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

**Revenue Budget
available**

Expenditure

Income

**Effect of decision
from report**

Expenditure

Income

Remaining budget

**Capital Budget
available**

Expenditure

**Effect of decision
from report**

Expenditure

Remaining budget

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

2. The effect of the decision

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

3. Risks

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

4. Options

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

5. Future savings/efficiencies

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

Approved by: Louise Lynch, Business Partner, Place Department

6. COMMENTS OF THE COUNCIL SOLICITOR AND MONITORING OFFICER

The Council Solicitor comments that Section 6, 124 and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984 (as amended) provides powers to introduce, vary and implement Traffic Management Orders. In exercising this power, section 122 of the Act Imposes a duty on the Council to have regard (so far as practicable) to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway. The Council must also have regard to such matters as the effect on the amenities of any locality affected.

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

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

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

7. HUMAN RESOURCES IMPACT

7.1 There are no human resources implications arising from this report

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

8. EQUALITIES IMPACT

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

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

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

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

9. ENVIRONMENTAL IMPACT

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

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

10. CRIME AND DISORDER REDUCTION IMPACT

10.1 There are no direct implications arising from the proposals.

11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

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

12. OPTIONS CONSIDERED AND REJECTED

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

CONTACT OFFICER: Mike Barton-Service Manager Highway Improvement. x61977.

Waheed Alam-Traffic & Highways Engineer

x52831

BACKGROUND PAPERS -

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