

## Delegated Report

### Cabinet Member for the Cabinet Member for Regeneration, Housing & Transport

**Date:** 13<sup>th</sup> March 2020

**Agenda item:** N/A

**Wards:** Raynes Park, Dundonald, Hillside, Village and Wimbledon Park

**Subject:** PROPOSED 20 MPH SPEED LIMIT - PHASE 6

**Lead officer:** Chris Lee, Director of Environment & Regeneration

**Lead member:** Councillor Martin Whelton, Cabinet Member for Regeneration Environment & Housing

**Forward Plan reference number:** N/A

**Contact Officer:** David Petcher 020 8274-4901

**Email:** David.Petcher@merton.gov.uk

### Recommendations:

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That the Cabinet Member considers the issues detailed in this report and

- A) notes the result of the statutory consultation that was carried out between 23<sup>rd</sup> of January and 14<sup>th</sup> February 2020 on the introduction of a 20mph speed limit to include Aboyne Drive, Alan Road, Albert Grove, Alexandra Mews, Alexandra Road, SW19; Alfreton Close, Allington Close, Almer Road, Alt Grove, Alwyne Road, Amity Grove, Arterberry Road, Arthur Road, SW19, between Home Park Road and St Mary's Road; Atherton Drive, Avenue Road, SW20; Barham Road, Bathgate Road, Beech Close, Beltane Drive, Belvedere Avenue, Belvedere Drive, Belvedere Grove, Belvedere Square, Berkeley Place, Bernard Gardens, Beverley Avenue, Brockham Close, Burdett Avenue, Burghley Road, Calonne Road, Cambridge Close, Cambridge Road, SW20; Camelot Close, Camp Road, Camp View, Cannizaro Road, Castle Close, Castle Way, Chester Road, Church Hill, Church Road between Bathgate Road and High Street, Wimbledon; Clement Road, Clifton Road, Compton Road, Conway Road, Coombe Gardens, Coombe Lane between the borough boundary with the Royal Borough of Kingston and its junction with Pepys Road, Copse Hill, Cottenham Drive, Cottenham Park Road, Cottenham Place, Courthope Road, Courthope Villas, Cranbrook Road, Cranford Close, Crescent Road, Crooked Billet, Cumberland Close, Currie Hill Close, Darlaston Road, Deepdale, Delamere Road, Denmark Avenue, Denmark Road, Devas Road, Dora Road, Drax Avenue, Draxmont, Dunmore Road, Dunstall Road, Durham Road, Durrington Park Road, Edge Hill, Ellerton Road, Elm Grove, Ernle Road, Ethelbert Road, Francis Grove, Greenoak Way, Glendale Drive, Grosvenor Hill, Hampton Close, Haven Close, Haygarth Place, Heath Mead, Heights Close, High Cedar Drive, High Street, Wimbledon; High Street Mews, Highbury Road, Hillside, Hillview, Holland Avenue, Home Park Road, Homefield Road, Hood Road, Hunter Road, Huntley Way, Kenilworth Avenue, Kenwyn Road, Lake Road, Lambourne Avenue, Lambton Road, Lampton House Close, Lancaster Gardens, Lancaster Road, Landgrove Road, Langham Road, Lansdowne Close, Lansdowne Road, Laurel Road, Lauriston Road, Lawson Close, Leeward Gardens, Leopold Avenue, Leopold Road, Lincoln Avenue, Lingfield Road, Lower Downs Road (north of the railway line), Malcolm Road, Mansel Road, Margin Drive, Marryat Place, Marryat Road, McKay Road, Melbury Gardens, Midmoor Road, Montana Road, Murray Road, Newstead Way, North View, Nursery Road, SW19; Oakfield Road, Oakwood Road, Old House Close, Oldfield Road, Orchard Lane, Panmuir Road, Parkfields Avenue, Parkside between the common boundary of Nos. 22 and 23a Parkside and High Street, Wimbledon; Parkside Avenue, Parkside Gardens, Parkwood Road, Peek Crescent, Pendarves Road, Pentney Road, Pepys Road, Peregrine Way,

Perth Close, Pine Grove, Preston Road, Queensmere Close, Queensmere Road, Raymond Road, Rectory Orchard, Ricards Road, Richmond Road, Ridgway, Ridgway Gardens, Ridgway Place, Rokeby Place, Rosevine Road, Rostrevor Road, Salisbury Road, Savona Close, Seymour Road, Somerset Road, Southdown Drive, Southdown Road, Southridge Place, Southside Common, Spencer Hill, Spencer Hill Road, Spencer Road, SW20; Springfield Road, St Aubyn's Avenue, St Georges Road, St Johns Road, St Mark's Place, St Mary's Road, Stanton Road, Strathearn Road, Sunnyside, Sycamore Road, Tabor Grove, Thackeray Close, Thaxted Place, The Causeway, The Downs, The Drive, SW20; The Grange, The Green, SW19; Thornton Hill, Thornton Road, Thurstan Road, Tolverne Road, Trewince Road, Vineyard Hill Road, Waldemar Road, Welford Place, West Place, West Side Common, Westcoombe Avenue, Wilberforce Way, Wimbledon Bridge, Wimbledon Hill Road, Windy Ridge Close, Wolsey Close, Woodhayes Road, Woodside, Wool Road, Worcester Road, Worple Avenue, Worple Road, Worple Road Mews and Wyke Road. For the entire area that encompasses phase 6 is shown on plan No. Z73-26-02 attached in Appendix 1.

- B) Considers the representations received in response to the statutory consultation and officer's comments attached in Appendix 3.
- C) Agrees to proceed with the making of the relevant Traffic Management Orders (TMOs) and the implementation of the proposed measure as shown in plan No. Z73-26-02 attached in Appendix 1.
- D) Agrees to exercise his discretion not to hold a public inquiry on the consultation process.

## **1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY**

- 1.1 This report presents the results of the statutory consultation carried out on the Councils' proposals to introduce the final phase of the borough wide 20mph speed limit.
- 1.2 It seeks approval to proceed with the making of the relevant Traffic Management Orders (TMOs) and the implementation of the above proposal as shown in Drawing No. Z73-26-02 attached in Appendix 1.

## **2. BACKGROUND**

- 2.1 In recent years, a number of local authorities including some neighbouring boroughs have introduced borough wide 20mph speed limit, which is also supported by the Mayor of London's transport strategy. It has always been the Council's aspiration to introduce a borough wide 20mph but given the size of the borough and the extent of the proposal it has been necessary to introduce the borough wide 20mph speed limit in phases. This phase is the last phase of the programme.
- 2.2 The principle of this project is to instigate a change in behaviour – that is to say to encourage drivers to travel at a consistent lower speed not just throughout the borough but from borough to borough. The borough limit will work alongside neighbouring borough's 20mph speed limits. This is expected to bring about a cultural change so that it is socially unacceptable to drive over 20mph in London.

## **3. PROPOSED MEASURES**

- 3.1 To improve the general road safety and environment, it is proposed to introduce the final phase of the borough's 20mph speed limit borough wide to include the area identified within the plan No. Z73-26-01 attached in Appendix 1.

- 3.2 The proposal includes the installation of a number of signs throughout the affected roads and '20 roundel' markings. Some of the road markings in the area will also be refreshed. Where possible existing lamp columns and posts will be utilised for the required signs.
- 3.3 There are no other physical features proposed at this time.

#### **4.0 CONSULTATION**

- 4.1 To legally reduce the existing speed limit of 30mph to 20mph, the Council carried out a statutory consultation between 23<sup>rd</sup> January and 14th February 2020. The consultation included the erection of street Notices on lamp columns in the affected roads and the publication of the Council's intentions in Wimbledon Times and the London Gazette. A copy of the proposed plan was available at Wimbledon library and at the Link, Merton Civic Centre; the plan was also posted on the Council's website. Given the number of properties in the identified catchment area; limited available funding and resources and the fact that the Council is not legally obliged to do a door to door newsletter, the Council decided to engage the local community through known resident and business associations and Ward Councillors.
- 4.2 The consultation resulted in ten representations, which are detailed in Appendix 3 along with officer's comments.
- 4.3 All Emergency Services have been consulted and no objections have been raised.

#### **5.0 RECOMMENDATIONS**

- 5.1 It is recommended that the Cabinet Member considers the representations received along with officer's comments and approves the making of the Traffic Management Order and the implementation of the proposed 20mph speed limit. If agreed the works will be carried out soon after within 2020/21 financial year.

#### **6.0 ALTERNATIVE OPTIONS**

- 6.1 Do Nothing. This, however, would be contrary to the Council's current practice in introducing 20mph speed limits and this area would be the only area in the borough that would be outside the borough wide 20mph speed limit.

#### **7.0 FINANCIAL RESOURCE AND PROPERTY IMPLICATIONS**

- 7.1 The cost of implementing this scheme is estimated at £53k. This includes the cost of the statutory consultation, signs / road markings and making of the relevant Traffic Management Orders.
- 7.2 The cost of this scheme will be funded from TfL LiP allocation for 2019/20.

#### **8.0 LEGAL AND STATUTORY IMPLICATIONS**

- 8.1 The Traffic Management Orders for a limit would be made under Section 84 of the Road Traffic Regulation Act 1984 (as amended). The Council is required by the Local Authorities Traffic Order (Procedure) (England and Wales) Regulations 1996 to give notice of its intention to make a Traffic Order (by publishing a draft traffic order). These regulations also require the Council to consider any representations received as a result of publishing the draft order.
- 8.2 The Council has discretion as to whether or not to hold a public inquiry before deciding whether or not to make a traffic management order or to modify the published draft order. A public inquiry should be held where it would provide further information, which would assist the Council in reaching a decision.

## **9. HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS**

- 9.1 The Council carries out careful consultation to ensure that all road users are given a fair opportunity to air their views and express their needs. The needs of those outside the catchment area and local residents are given consideration but it is considered that improving safety on the borough roads take priority.
- 9.2 Bodies representing motorists, including commuters are included in the statutory consultation required for draft traffic management and similar orders.
- 9.3 The implementation of 20mph speed limit affects all sections of the community especially vulnerable road users such as cyclists, the young and the elderly; and assists in improving safety for all road users as well as achieving Merton's commitment in reducing speed, casualty and severity of road traffic accidents.

## **10. CRIME AND DISORDER IMPLICATION**

- 10.1 N/A

### **APPENDICES**

The following documents are to be published with this report and form part of the report.

Appendix 1 – Plan of proposals Z73-26-02

Appendix 2 – Statutory consultation Notice

Appendix 3 – Representations





**LONDON BOROUGH OF MERTON**

**20 MPH SPEED LIMIT - PHASE 6**

**THE MERTON (20 MPH SPEED LIMIT) (NO. \*) TRAFFIC ORDER 202\***

1. NOTICE IS HEREBY GIVEN that the Council of the London Borough of Merton, propose to make the above-mentioned Order under sections 84 and 124 of, and Part IV of Schedule 9 to, the Road Traffic Regulation Act 1984, as amended, and all other enabling powers.
2. The general effect of the Order will be to:-
  - (a) impose a 20 MPH speed limit in the roads or lengths of roads described in Schedule 1 to this notice, and,
  - (b) revoke the Orders specified in Schedule 2 to this notice and re-enact their provisions.
3. A copy of the proposed Order and other documents giving more detailed particulars of the Order, including a plan which indicate the lengths of roads to which the Order relates can be inspected during the Council's normal office hours on Mondays to Fridays inclusive at Merton Link, Merton Civic Centre, London Road, Morden.
4. Any person desiring to make representations or to object to the proposed Order should send a statement in writing of their representations or objections and the grounds thereof, to the Environment and Regeneration Department, Merton Civic Centre, London Road, Morden, Surrey, SM4 5DX or alternatively by email to [trafficandhighways@merton.gov.uk](mailto:trafficandhighways@merton.gov.uk) quoting the reference **ES/20MPHPHASE6** no later than **14th February 2020**.

Dated 23 January 2020.

Paul McGarry  
Head of futureMerton  
London Borough of Merton

**SCHEDULE**

All roads bounded by the District Line railway line, the railway line running between Wimbledon Station and New Malden Station, the borough boundary with the Royal Borough of Kingston and the borough boundary with the London Borough of Wandsworth, but not including Camberley Avenue, Parkside between the borough boundary with the London Borough of Wandsworth and the common boundary of Nos. 22 and 23a Parkside, Somerset Avenue, Taunton Avenue and West Barnes Lane north of the Wimbledon to New Malden railway line which include:-

Aboyne Drive, Alan Road, Albert Grove, Alexandra Mews, Alexandra Road, SW19; Alfreton Close, Allington Close, Almer Road, Alt Grove, Alwyne Road, Amity Grove, Arterberry Road, Arthur Road, SW19, between Home Park Road and St Mary's Road; Atherton Drive, Avenue Road, SW20; Barham Road, Bathgate Road, Beech Close, Beltane Drive, Belvedere Avenue, Belvedere Drive, Belvedere Grove, Belvedere Square, Berkeley Place, Bernard Gardens, Beverley Avenue, Brockham Close, Burdett Avenue, Burghley Road, Calonne Road, Cambridge Close, Cambridge Road, SW20; Camelot Close, Camp Road, Camp View, Cannizaro Road, Castle Close, Castle Way, Chester Road, Church Hill, Church Road between Bathgate Road and High Street, Wimbledon; Clement Road, Clifton Road, Compton Road, Conway Road, Coombe Gardens, Coombe Lane between the borough boundary with the Royal Borough of Kingston and its junction with Pepys Road, Copse Hill, Cottenham Drive, Cottenham Park Road, Cottenham Place, Courthope Road, Courthope Villas, Cranbrook Road, Cranford Close, Crescent Road, Crooked Billet, Cumberland Close, Currie Hill Close, Darlaston Road, Deepdale, Delamere Road, Denmark Avenue, Denmark Road, Devas Road, Dora Road, Drax Avenue, Draxmont, Dunmore Road, Dunstall Road, Durham Road, Durrington Park Road, Edge Hill, Ellerton Road, Elm Grove, Ernle Road, Ethelbert Road, Francis Grove, Greenoak Way, Glendale Drive, Grosvenor Hill, Hampton Close, Haven Close, Haygarth Place, Heath Mead, Heights Close, High Cedar Drive, High Street, Wimbledon; High Street Mews, Highbury Road, Hillside, Hillview, Holland Avenue, Home Park Road, Homefield Road, Hood Road, Hunter Road, Huntley Way, Kenilworth Avenue, Kenwyn Road, Lake Road, Lambourne Avenue, Lambton Road, Lampton House Close, Lancaster Gardens, Lancaster Road, Landgrove Road, Langham Road, Lansdowne Close, Lansdowne Road, Laurel Road, Lauriston Road, Lawson Close, Leeward Gardens, Leopold Avenue, Leopold Road, Lincoln Avenue, Lingfield Road, Lower Downs Road (north of the railway line), Malcolm Road, Mansel Road, Margin Drive, Marryat Place, Marryat Road, McKay Road, Melbury Gardens, Midmoor Road, Montana Road, Murray Road, Newstead Way, North View, Nursery Road, SW19; Oakfield Road, Oakwood Road, Old House Close, Oldfield Road, Orchard Lane, Panmuir Road, Parkfields Avenue, Parkside between the common boundary of Nos. 22 and 23a Parkside and High Street, Wimbledon; Parkside Avenue, Parkside Gardens, Parkwood Road, Peek Crescent, Pendarves Road, Pentney Road, Pepys Road, Peregrine Way, Perth Close, Pine Grove, Preston Road, Queensmere Close, Queensmere Road, Raymond Road, Rectory Orchard, Ricards Road, Richmond Road, Ridgway, Ridgway Gardens, Ridgway Place, Rokeby Place, Rosevine Road, Rostrevor Road, Salisbury Road, Savona Close, Seymour Road, Somerset Road, Southdown Drive, Southdown Road, Southridge Place, Southside Common, Spencer Hill, Spencer Hill Road, Spencer, Road, SW20; Springfield Road, St Aubyn's Avenue, St Georges Road, St Johns Road, St Mark's Place, St Mary's Road, Stanton Road, Strathearn Road, Sunnyside, Sycamore Road, Tabor Grove, Thackeray Close, Thaxted Place, The Causeway, The Downs, The Drive, SW20; The Grange, The Green, SW19; Thornton Hill, Thornton Road, Thurstan Road, Tolverne Road, Trewince Road, Vineyard Hill Road, Waldemar Road, Welford Place, West Place, West Side Common, Westcoombe Avenue, Wilberforce Way, Wimbledon Bridge, Wimbledon Hill Road, Windy Ridge Close, Wolsey Close, Woodhayes Road, Woodside, Wool Road, Worcester Road, Worple Avenue, Worple Road, Worple Road Mews and Wyke Road.

**Burghley Road** ES/20MPHPHASE6

I am fully supportive of this proposal. However, how will it be enforced? Currently, the 30 mph rules are generally being ignored on many of the roads in question.

Without proper enforcement, I fear this is a purely academic exercise.

**Worple Road** ES/20MPHPHASE6

I am responding to the consultation about imposing a 20mph speed limit on Worple Road and surrounding roads. I totally and whole heartedly agree with this proposal and ask that the Council implements this as soon as possible.

We have a real problem with speeding lorries and HGV's on Worple Road - they speed along the length of the Road far in excess of the current 30 mph zone and this poses a significant safety risk - it also causes noise pollution and vibration/tremors to our building as they speed past - the vibration in particular is causing us a lot of problems and disturbing sleep at night etc. This has become a really intractable problem for some months now. a lower speed limit will alleviate this.

If you are to impose such a limit - speed cameras must be installed to ensure that you can enforce it - otherwise they will just ignore the speed limit. There is currently a 30 mph speed limit but it is not adhered to at all.

**No Address** ES/20MPHPHASE6

I am very pleased to learn that you intend to set a 20mph limit (around 32kph) on every road in Merton. Please enforce the limit with hefty fines particularly on those roads where there are no bicycle lanes; for example, the narrow Ridgway SW19 is menaced regularly in term time by speeding school coaches, and similarly narrow Barham Road SW20 by all users of the Rugby Club.

**Southside** ES/20MPHPHASE6

I refer to your consultation regarding introducing uniformity of 20 mph in respect of the variety of different speed limits which currently exist in residential roads in Wimbledon Village

As an older residents I actively support this initiative to lower the current speed limit. Residents of Southside Common have long campaigned for some measure of control of the speeds observed in this road which can make it difficult to cross to the Commons

The effect of the very slight raised section in Southside common just prior to the village shops is extremely beneficial in reducing speed as can be observed by a simple watch of the brake lights of vehicles entering this section of the road

In order to mitigate speeds at the opposite or west end of Southside Common and to supplement this initiative it would be sensible to replicate this arrangement ( that at the east end ) at the junction of Southside Common and Clifton Road and also the junction of Southside Common and Lauriston Road

Speeding in Southside Common at its west end is considerably worse than that at the east end partly due to its straight nature and clear vision

Pay parking in the road could be reorganised to eliminate this as could tree planting off common

In addition the establishment of a keep left sign at the junction of Woodhayes Road / West side Common Road with Southside Common and clear halt signs at the exit from Southside Common would significantly reduce the propensity of speeding cars to cut this junction and provide prescriptive information for cars exiting Southside Common and wanting to turn right or left

This inadequate junction is responsible for many minor accidents and near misses directly outside a school

Thank you for your consideration of these matters

**No Address** ES/20MPHPHASE6

I am writing to give my wholehearted support for the 20mph Phase 6 rollout. As a local resident, pedestrian and cyclist I marvel at the fact that I have not witnessed a serious speed related incident yet. Our borough sees a significant amount of through traffic given it's proximity to the A3 and suffer from a majority of our roads being residential. Worple road, which I use every day as a cyclist commuter often resembles a race track - and the adjoining slopes roads quite frankly dangerous to use without the safety of a metal box.

I hope that the adoption of a 20mph limit in the borough discourages through traffic and for local residents on their journeys, they are encouraged to avoid the temptation of speeding on their roads. As a resident of an existing 20mph limit (The Downs), I can sadly inform you that this is seldom adhered to - so I hope that enforcement of the borough wide limit is on your agenda. For those areas that are already a 20mph limit (for example the slopes area - where many schools are), you consider within your budget liberties for this phase additional measure to ensure that traffic actually travels at 20mph in these higher risk areas - through converting existing limits into "zones."

**Alwyne Rd** ES/20MPHPHASE6

To Whom It May Concern,

We live at [REDACTED] and would like to support the introduction / roll out of 20mph zone throughout Wimbledon, on the basis that it's the safest and most appropriate speed for vehicles, pedestrians and cyclists to share the roads and town together in urban areas. We wholeheartedly support it!

**Highbury Road** ES/20MPHPHASE6

I live in [REDACTED] and fully endorse the proposals to reduce the speed limit in the Wimbledon area to 20 mph.

**Wilton Road** ES/20MPHPHASE6

We live in [REDACTED]. We strongly support a wide speed restriction of 20mph. It's for everyone safety in an area full of schools, parks and residential roads.

We would also support a scheme that would prosecute offenders more often as we often have primarily delivery vans travelling too quickly through our road.

**The Downs** ES/20MPHPHASE6

I write in support of the above proposed 20 MPH speed limit. As a resident on The Downs we have a total of six schools nearby, with three on our road and three on neighbouring roads, receiving over 4000 pupils in total each day. The pavements on Ridgway at the top and Worple Road at the bottom of our road are frequently crammed with school children while some very heavy vehicles, such as, concrete lorries and building material grabber lorries, hurtle along at 30 MPH. I have seen children playfully push each other in to the road, trip off the pavement, etc. Reducing the speed limit to 20 MPH will improve the safety for the children, and possibly encourage parents to allow more children to walk or cycle to these schools and improve the air quality for all of us. Having walked my children to nursery and then school along these roads for many years in the past I can report these are difficult roads for school children to be trying to cross. I am so pleased to see Merton is trying to sort this out. Thank you.

Objection**Copse Hill** ES/20MPHPHASE6

I wish to register a very strong objection to the proposed order. The reduction of a speed limit from 30 mph to 20 mph on the wide variety of roads mentioned is unnecessarily indiscriminate. There are some areas of the borough where the proposal will make sense as it will improve road safety. However there are other wide roads with good visibility where the proposal will be unnecessary and even dangerous. Modern cars are quite powerful- whether petrol, diesel or electric and it is hard to ensure that the speed is no higher than 20 mph without constant reference to the speedometer. This leads to distraction from the looking at the road. Already in other areas of the borough such roads are the scene of impatience and dangerous overtaking. I therefore consider the council proposal to be arbitrary and indiscriminate. Whilst Copse Hill is clearly a road where I believe the proposal to be foolish, the same is clearly true of other roads.

I have no hope that this objection will be taken remotely seriously since the Council has already introduced such speed limits without consultation in other areas. However, I fear that such a proposal will lead to poorer driving and less safety.

**No Address** Ref: ES/20MPHPHASE6

SCHEDULE 1 of the proposal listed in the Wimbledon press on 23<sup>rd</sup> January appears to include all the roads within the defined area of Wimbledon, with no exceptions. This indiscriminate blanket inclusion of every road excludes thoroughfares which, in my opinion, do not deserve to be included, as the possibilities of accidents due to motorists driving within the present 30 mph limit are minimal. Is there any evidence from road accident reports to support their inclusion? In other boroughs, where the 20mph limit has been imposed, main highways are not subject to this speed restriction, to allow for free movement of traffic, without unnecessary delays.

May I suggest that consideration be given to the exclusion of the following roads, from Schedule 1:-

- Cambridge Road, SW20
- Coombe Lane
- Durham Road
- Lambton Road
- Pepys Road
- Ridgway
- Wimbledon Hill Road
- Worple Road

As a resident of this borough for 25 years, and a driver who frequently uses these roads, I feel confident in making the above observations and trust that they will be taken into account when this Proposal is discussed in committee.

**Albert Grove** Ref: ES/20MPHPHASE6

I am responding to the notice about the proposed change in the speed limit, which I see attached to a lamppost near my house. First of all I think it highly unlikely that many will have realize any form of consultation is taking place since the signs are so un-noticeable and unclear about what is happening.

Secondly the streets where such a speed limit is appropriate are just the ones that motorists are driving slowly along anyway; such as Albert Grove where I live.

For roads like Worple Road and Coombe Lane, 30 mph is fine and any change surely needs fully justifying. It is hard to drive so slowly, one has to keep checking one's speed, and it makes the whole business so fraught. In fact it is next impossible to drive so slowly for any distance.

As it is recent draconian measures to enforce rules about 'the yellow box' and bus lanes are excessive and bear little relation to other aspects of life or indeed other much more serious crimes. (I could give examples). In fact there is now no room for a driver to make a mistake, even where there is no intention to cause offence or there has been no obstruction to traffic flow.

Road works cause plenty of disruption to traffic flow but work on them often shows little sign of urgency.

These quite drastic proposed changes, (a reduction in speed by over 30 percent), seem to lack any merit and are difficult to adhere to. 25 mph is doable, even if trying.

**Raymond Road** Ref: ES/20MPHPHASE6

I wish to make representation to object to the proposed 20mph speed restriction on the following grounds:

1. The notification of this significant change to the way we use our roads has had limited communication with the notice attached to a few lampposts unlike the notification for the change in parking prices that were attached to virtually every lamppost in the borough. Most of my neighbours have not even noticed the order nor aware this is phase 6 of 6.
  2. The thinking behind 20mph zones is to change driving habits and encourage more environmentally friendly transport modes like walking and cycling. Whilst I accept this and see how that can work in town centres it cannot be the case for main arterial roads like Worple Road and Ridgway/Copse Hill as these are routes to the A3 so I would not be switching from my car to a bike for such journey. The proposed speed change should not include these main routes as there is no clear benefit that a 20mph speed would be appropriate.
  3. There is no evidence that 20mph zones reduce casualties. What method does the Council have for monitoring the effectiveness of the scheme and reversing any changes?
  4. The Council should be prioritising spending on other more urgent matters.
  5. Journey times will increase therefore pollution will increase.
- I object to the blanket approach of this proposal with no clear benefit.

**Comment**

**No Address** ES/20MPHPHASE6

I should like to draw your attention to Woodhayes Road SW19 is a 30mph residential road which attracts speeds far above this. It is in front of a school and is near to several others, it has a zebra crossing on a bend where it is difficult to be seen from the road in both directions (from the North side). Cars fly through the narrow point where two lines of parked cars obscure pedestrians, when cars hit parked cars they do not stop, my own car suffered damage to front wing and wing mirror on two separate incidents when I moved into the area, I no longer park on Woodhayes Road.

As a resident of XX Crooked Billet I am amazed people are not hit on a regular basis. I would ask that this road and Ernle, Dunstall, Mackay which are all feeders be re-zoned as 20 mph. I would suggest that the 20mph designation should lift to 30mph after the crossing points on the common (The Causeway).

Crooked Billet would therefore also be 20 mph but this is not a practical limitation

**Officer's Comment**

Merton is committed to road safety and we have a number of initiatives that promotes road safety. One initiative is the introduction of a borough wide 20mph speed limit. To improve the general road safety and environment and in line with the Mayor of London's transport priorities which has been adopted within the Borough's LiP, this is the final phase of the borough wide 20mph speed limit.

The objective is to change behaviour – that is to say to encourage drivers to travel at a consistent lower speed not just along specific roads but throughout the borough and from borough to borough. The borough wide limit will work alongside neighbouring borough's 20mph speed limits. This is expected to bring about a cultural change so that it is socially unacceptable to drive over 20mph in London.

In terms of benefits, it is considered that with a change in behaviour, there will be less aggressive driver behaviour; less likelihood of accidents; lower accident severity; improved perception of safety; safer highway environment and improved experience for all vulnerable road users. Studies show that compared to 30mph, not only are the number of accidents reduced in 20mph roads, but also their severity. For instance, a pedestrian sustaining a fatal injury from a collision decreases from approximately 55% at an impact speed of 30mph to 17% at an impact speed on 20mph. There are also health benefits, as lower speeds help improve physical and mental health. As roads become safer people are more inclined to walk and cycle more, providing regular exercise and enabling healthier lifestyles. Air and noise pollution are also reduced at 20mph and these measures support sustainable

transport options and encourage modal shift. There are many studies available on various websites including DfT and TfL websites.

Almost every road in Merton is residential including main roads which also accommodate retail; much heavier traffic (both vehicular and pedestrians); more activities on the highway which means a greater risk to all road users. It is, therefore, considered that a 20mph speed would benefit a higher level of road users. Also as it is our objective to ensure a change in behaviour and attitude toward speed, it is unlikely to be achieved by the constant change to and from 20mph and 30mph.

As per all our schemes as part of a statutory consultation all emergency services including the Police are consulted. The Police are fully aware of the various London wide proposals for introducing 20mph speed limit and they have been actively enforcing the speed limit. It is acknowledged that they do have other priorities and the level of enforcement is unlikely to increase but that does not mean that boroughs stop implementing what is considered as a safer speed for all. Of course they will always be some inconsiderate aggressive drivers but this would be the case regardless of the speed being 20mph or 30mph. This is evidenced through the volume of complaints the Council receive on an annual basis regarding excessive speed and perception of safety. A change in behaviour is therefore key and more likely to be achieved by a borough wide 20mph speed limit.

There are two main methods of speed limit enforcement, passive and active. Passive speed enforcement is achieved by changing the road environment, ranging from the minimal legal requirement of installing the appropriate signage and road markings, to delivering engineering solutions consisting of various traffic calming measures. Active speed enforcement is carried out by either the police, who are responsible for enforcing all speed limits, or with the assistance of local residents who may wish to take part in the Community Road Watch which is an initiative set up by TfL and the Police.

With regards to the consultation process, the statutory consultation was carried as per adopted practice for this type of consultation. It is considered that the Council has undertaken the consultation as per minimum legal requirement by erecting Notices on lamp columns throughout the consultation area; publications in the local newspapers; documents in the local library and on the Council's website. All Ward Councillors were also advised of the consultation and Council's proposal.