Recommendations:

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 6th of September and 27th of September 2019 on the introduction of a 20mph speed limit to include Abbey Road, Abbott Avenue, Adela Avenue, Allgood Close, Amenity Way, Approach Road, Aragon Place, Aragon Road, Arthur Road, Arundel Avenue, Ashbourne Terrace, Ashridge Way, Aston Road, Avalon Close, Avebury Road, Aylward Road, Bakers End, Balfour Road, Barnard Gardens, Barnes End, Bathurst Avenue, Beaufort Grove, Beaver Close, Belmont Avenue, Berrylands, Beulah Road, Blakes Terrace, Blenheim Close, Blenheim Road, Bodnant Gardens, Boscombe Road, Botsford Road, Bournemouth Road, Bradshaw Close, Braeside Avenue, Branksome Road, Brisbane Avenue, Broadway Court, Bronson Road, Brook Close, Buckleigh Avenue, Burlington Road, Burstow Road, Bushey Court, Bushey Road, Buttermere Close, Byron Avenue, Camberley Avenue, Camborne Road, Camrose Close, Cannon Close, Cannon Hill Lane, Cardinal Avenue, Cardinal Close, Carlingford Road, Carlton Park Avenue, Caroline Road, Cavendish Avenue, Cecil Road, Cedars Road, Chadwick Avenue, Charles Road, Charnminster Avenue, Charnwood Avenue, Chasewater Avenue, Chatsworth Avenue, Cherry Close, Cherrywood Lane, Chestnut Road, Church Lane, Church Path, Church Walk, Churston Drive, Circle Gardens, Claremont Avenue, Cleveland Avenue, Cleveland Rise, Clifton Park Avenue, Cliveden Road, Cobham Avenue, Cochrane Road, Coniston Close, Consfield Avenue, Coppice Close, Cranleigh Road, Cranmer Close, Croft Road, Cross Road, Crossway, Crown Lane, (the length not part of the A24), Dane Road, Daybrook Road, Dennis Park Crescent, Derby Road, Derwent Road, Doel Close, Dorien Road, Dorset Road, Douglas Avenue, Dowman Close, Dudley Drive, Dudley Road, Dunonald Road, Dunster Avenue, Dupont Road, Eastway, Edna Road, Elm Walk, Elm Close, Erridge Road, Errol Gardens, Essex Close, Estella Avenue, Fairlawn Road, Fairway, Farnham Gardens, Firstway, Garth Close, Garth Road, Gladstone Road, Glenthorpe Road, Goodenough Road, Goodwood Close, Gore Road, Graham Road, Grand Drive, Granville Road, Grasmere Avenue, Grayswood Gardens, Greenway, Greenwood Close, Griffiths Road, Hadleigh Close, Harcourt Road, Harland Close, Hartfield Crescent, Hartfield Road, Hatherleigh Close, Haynt Walk, Hayward Close, Hazelsbury Close, Heath Drive, Henfield Road, Herbert Road, Heyford Avenue, Hidcote Gardens, High Path, Hilborough Close, Hillcross Avenue, Hillside Close, Kenley Road, Keswick Avenue, King’s Road, Kingsbridge Road, Kingston Road, Kingsway, Kingswood Road, Kirkley Road, Langley Road, Leafield Road, Leamington Avenue, Links Avenue, Linkway, Lower Downs Road (south of the railway line), Lower Morden Lane, Lynmouth
Avenue, Manor Gardens, Manor Road, Marina Avenue, Martin Grove, Martin Way, Mawson Close, Maycross Avenue, Mayfield Road, Meadow Close, Meadow Road, Meadowsweet Close, Meadway, Melbourne Road, Melrose Road, Merton Hall Gardens, Merton Hall Road, Merton High Street, Merton Road, Mill Road, Milner Road, Mina Road, Monkleigh Road, Montague Road, Morden Road (the length not part of the A24), Mossville Gardens, Mostyn Road, Nelson Grove Road, Newton Road, North Close, Northernhay Walk, Northway, Nova Mews, Nursery Road, Nymans Gardens, Oakway, Orchard Close, Oxford Avenue, Palmerston Grove, Palmerston Road, Parkleigh Road, Parkway, Pelham Road, Petworth Gardens, Phyllis Avenue, Pincott Road, Polesden Gardens, Poplar Road, Poplar Road South, Prince George's Avenue, Princes Road, Queen Elizabeth Gardens, Queen Mary Avenue, Queens Road, Morden; Queens Road, SW19; Queens Road, Quintin Avenue, Rayleigh Road, Raynes Park Bridge, Rectory Close, Richmond Avenue, Rodney Place, Rookwood Avenue, Rosebery Close, Rothesay Avenue, Rowland Way, Russell Road, Rutlish Road, Salcombe Drive, Sandbourne Avenue, Sandrigham Avenue, Savill Gardens, Seaforth Avenue, Seymour Avenue, Shaldon Drive, Shelton Road, Sheridan Road, Sherwood Road, Sir Cyril Black Way, Somerset Avenue, South Park Road, Southey Road, Southway, Springfield Avenue, Stane Close, Stanley Avenue, Stanley Road, Morden; Stanley Road, SW19, Station Road, Colliers Wood; Station Road, KT3; Stourhead Gardens, Stratton Road, Sydney Road, Taunton Avenue, Templecombe Way, Tennyson Avenue, The Beverley Roundabout, The Broadway, The Green, The Path, The Quadrant, The Rush, Thurleston Avenue, Toynbee Road, Trevor Road, Tudor Drive, Tybenham Road, Vernon Avenue, Watery Lane, Wessex Avenue, West Barnes Lane, Westcrot Gardens, Westway, Westway Close, Whatley Avenue, Willmore End, William Road, Wimbledon Bridge, Wilton Crescent, Wilton Grove, Windermere Avenue, Winifred Road, Wolsey Crescent, Woodland Way, Woodlands, Woodville Road and Wydell Close. As shown on plan No. Z73-26-01 attached in Appendix 1.

B) Considers the representations received in response to the statutory consultation 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. Z73-26-01 attached in Appendix 1 and as set out in section A above.

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 result of the statutory consultation carried on the Councils’ proposals to introduce a 20mph speed limit as set out in section A above and as shown on plan No. Z73-26-01 attached in Appendix 1.

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. Z73-26-01 attached in Appendix 1.

2. BACKGROUND

2.1. In recent years, some neighbouring boroughs have introduced borough wide 20mph speed limit which is also supported by the Mayor of London’s transport strategy. Although over the years the Council has incrementally introduced localised and area wide 20mph zones / limits, due to lack of funding, it was not possible to introduce a borough wide 20mph speed limit as a project. Upon securing the funding, in October 2018, the Council began the implementation of its borough wide 20mph speed limit. Due to the extend of the work, the project is being delivered in phases that covers specific
areas within each phase. There are 6 phases in total. Each phase is subject to its own specific statutory consultation followed by implementation (subject to Cabinet Member approval). It is envisaged that the final phase will be implemented in Jan/Feb 2020 subject to the statutory consultation that is planned to take place in December 2019.

2.2 The 20mph speed is being introduced without any physical intervention. It is believed that a borough wide 20mph speed limit the Council can bring about 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 culture change so that it is socially unacceptable to drive over 20mph in London.

3. PROPOSED MEASURES

3.1 Phase 5 of the proposal include Abbey Road, Abbott Avenue, Adela Avenue, Allgood Close, Amenity Way, Approach Road, Aragon Place, Aragon Road, Arthur Road, Arundel Avenue, Ashbourne Terrace, Ashridge Way, Aston Road, Avalon Close, Avebury Road, Aylward Road, Bakers End, Balfour Road, Barnard Gardens, Barnes End, Bathurst Avenue, Beaufort Grove, Beaver Close, Belmont Avenue, Berrylands, Beulah Road, Blakes Terrace, Blenheim Close, Blenheim Road, Bodnant Gardens, Boscombe Road, Botsford Road, Bournemouth Road, Bradshaw Close, Braeside Avenue, Branksome Road, Brisbane Avenue, Broadway Court, Bronson Road, Brook Close, Buckleigh Avenue, Burlington Road, Burstow Road, Bushey Court, Bushey Road, Buttermere Close, Byron Avenue, Camberley Avenue, Camber Road, Camrose Close, Cannon Close, Cannon Hill Lane, Cardinal Avenue, Cardinal Close, Carlingford Road, Carlton Park Avenue, Caroline Road, Cavendish Avenue, Cecil Road, Cedars Road, Chadwick Avenue, Charles Road, Charington Avenue, Charnwood Avenue, Chaseside Avenue, Chatsworth Avenue, Cherry Close, Cherrywood Lane, Chestnut Road, Church Lane, Church Path, Church Walk, Churston Drive, Circle Gardens, Claremont Avenue, Cleveland Avenue, Cleveland Rise, Clifton Park Avenue, Cliveden Road, Cobham Avenue, Cochrane Road, Coniston Close, Consfield Avenue, Coppice Close, Cranleigh Road, Cranmer Close, Croft Road, Cross Road, Crossway, Crown Lane, (the length not part of the A24), Dane Road, Daybrook Road, Dennis Park Crescent, Derby Road, Derwent Road, Doel Close, Dorien Road, Dorset Road, Douglas Avenue, Dowman Close, Dudley Drive, Dudley Road, Dundonald Road, Dunster Avenue, Dupont Road, Eastway, Edna Road, Elm Walk, Elm Close, Erridge Road, Errol Gardens, Essex Close, Estella Avenue, Fairlawn Road, Fairway, Farnham Gardens, Firstway, Garth Close, Garth Road, Gladstone Road, Glenthorpe Road, Goodenough Road, Goodwood Close, Gore Road, Graham Road, Grand Drive, Granville Road, Grasmere Avenue, Grayswood Gardens, Greenway, Greenwood Close, Griffiths Road, Hadleigh Close, Harcourt Road, Harland Close, Hartfield Crescent, Hartfield Road, Hatherleigh Close, Haynt Walk, Hayward Close, Hazelbury Close, Heath Drive, Henfield Road, Herbert Road, Heyford Avenue, Hidcote Gardens, High Path, Hilborough Close, Hillcross Avenue, Hillside Close, Kenley Road, Keswick Avenue, King's Road, Kingsbridge Road, Kingston Road, Kingsway, Kingswood Road, Kirkley Road, Langley Road, Leafield Road, Leamington Avenue, Links Avenue, Linkway, Lower Downs Road (south of the railway line), Lower Morden Lane, Lynmouth Avenue, Manor Gardens, Manor Road, Marina Avenue, Martin Grove, Martin Way, Mawson Close, Maycross Avenue, Mayfield Road, Meadow Close, Meadow Road, Meadowweet Close, Meadway, Melbourne Road, Melrose Road, Merton Hall Gardens, Merton Hall Road, Merton High Street, Merton Road, Mill Road, Milner Road, Mina Road, Monkleigh Road, Montague Road, Morden Road (the length not part of the A24), Mossville Gardens, Mostyn Road, Nelson Grove Road, Newton Road, North Close, Northernhay Walk, Northway, Nova Mews, Nursery Road, Nymans Gardens, Oakway, Orchard Close, Oxford Avenue, Palmerston Grove, Palmerston Road, Parkleigh Road, Parkway, Pelham Road, Petworth Gardens, Phyllis Avenue, Pincott Road, Polesden Gardens, Poplar Road, Poplar Road South, Prince George's Avenue, Princes Road, Queen Elizabeth Gardens, Queen Mary Avenue, Queens Road, Morden; Queens
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3.2 The proposal include the installation of signs throughout the affected roads and '20 roundel' road markings. Some of the road markings in the area will be refreshed. Where possible existing lamp columns / posts will be utilised for the required signs.

4. CONSULTATION
4.1 To legally reduce the existing speed limit of 30mph to 20mph, the Council carried out a statutory consultation between 6th and 27th September 2019. The consultation included the erection of street Notices on lamp columns in the affected roads and the publication of the Council's intentions in the Local Guardian 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 Ward Councillors.

4.2 The consultation resulted in twenty-seven 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 2019 / 20 financial year.

6.0 ALTERNATIVE OPTIONS
6.1 Do Nothing. This, however, would be contrary to the Council’s aspirations of a lower speed limit throughout the borough thereby bringing about a change in driver behaviour.

7.0 FINANCIAL RESOURCE AND PROPERTY IMPLICATIONS
7.1 The cost of implementing this scheme is estimated at £60k. 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 by TfL via the borough’s 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 albeit incrementally.

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 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 Z73-26-01
Appendix 2 – Statutory consultation
Appendix 3 – Representations
LONDON BOROUGH OF MERTON

PROPOSED 20 MPH SPEED LIMIT - PHASE 5

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

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 would be to impose a 20 MPH speed limit in the roads or lengths of roads described in the Schedule to this notice.

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 quoting the reference ES/20MPH PHASE5 no later than 27th September 2019.

Dated 6 September 2019.

Paul McGarry
Head of Future Merton
London Borough of Merton
SCHEDULE

All roads bounded by but not including the A24, by and including Merton High Street which is not red route network, by and including Merton Road, by and including The Broadway, by but not including Trinity Road and Ashcombe Road, by the Haydons Road station to Wimbledon Station railway, by the Wimbledon station to Raynes Park station railway, by but not including Coombe Lane to the boundary of controlled parking zone RPC, south-westward to the western boundary of the London Borough of Merton with the London Borough of Kingston and the western and southern boundary of the London Borough of Merton to the A24 and which include:

Abbey Road, Abbott Avenue, Adela Avenue, Allgood Close, Amenity Way, Approach Road, Aragon Place, Aragon Road, Arthur Road, Arundel Avenue, Ashbourne Terrace, Ashridge Way, Aston Road, Avalon Close, Avebury Road, Aylward Road, Bakers End, Balfour Road, Barnard Gardens, Barnes End, Bathurst Avenue, Beach Grove, Beaver Close, Belmont Avenue, Berrylands, Beulah Road, Blakes Terrace, Blenheim Close, Blenheim Road, Bodnant Gardens, Boscombe Road, Botsford Road, Bournemouth Road, Bradshaw Close, Braeside Avenue, Branksome Road, Brisbane Avenue, Broadway Court, Bronson Road, Brook Close, Buckleigh Avenue, Burlingt

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<tr>
<th><strong>Support</strong></th>
<th><strong>Appendix 3</strong></th>
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<tr>
<td><strong>LYNMOUTH AVE/ LOWER MORDEN</strong> ES/20MPHphASE5</td>
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<tr>
<td>Please could you make the whole of Lynmouth Ave a 20MPH zone as it is used as a cut-through from the Beverley roundabout / Tudor Drive to the A24, it needs calming measures as well as cars speed up and down the road as soon as they pass the width barrier at the entrance</td>
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<td>I have noticed at rush hour that the number of cars passing my house are in excess of the number of houses in the immediate vicinity and the speed some of them are travelling is worrying</td>
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<td>There will need to be some enforcement or control of the MPH limit or it will simply be ignored.</td>
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<tr>
<td><strong>Chase Side Avenue</strong> ES/20MPHphASE5</td>
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<td>This is a very good proposal which I support. High traffic speeds discourages, activities such as cycling due to perceived danger. It also increases peril particularly for those with mobility issues who may have difficulty crossing roads quickly. Reduced traffic speeds should, by extension, improve these aspects.</td>
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<td>The notice lists Chaseside Avenue although I assume this should have been Chase Side Avenue. I am not sure if that is something which requires correction as the intent seems clear.</td>
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<td><strong>No Address</strong> ES/20MPHphASE5</td>
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<tr>
<td>I support a 20 limit for Hartfield road but hope it will be very clearly signed. Car park exit near Herbert road may present a hazard at present speeds.</td>
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<td><strong>No Address</strong> ES/20MPHphASE5</td>
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<tr>
<td>I’m writing in support of the 20 mile an hour limits proposed, including on Princes Road.</td>
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<td><strong>No Address</strong> ES/20MPHphASE5</td>
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<tr>
<td>I write concerning the proposed extension of 20mph zones. The patchwork approach to rolling out 20mph zones appears disparate. Consequently this is both confusing for drivers and arbitrary in its achievement of the policy objectives. For example, entire batches of narrow, residential roads in Wimbledon continue to be 30mph zones - used as increasingly dangerous “rat-runs”.</td>
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<td>I would welcome the council taking a more ambitious approach and expanding the roll out to all residential roads in Wimbledon/Merton e.g. Dora Road and Kenilworth Avenue.</td>
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<td><strong>Lingfield Rd</strong> ES/20MPHphASE5</td>
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<tr>
<td>Please could you include Lingfield Road and the Grange in the 20 mph area.</td>
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<tr>
<td><strong>Springfield Avenue</strong> ES/20MPHphASE5</td>
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<td>Further to your notice displayed on the post outside my property, I note it is proposed that a 20 MPH speed restriction is mooted. I do hope that this is brought into force (and the sooner the better). There is an increasing volume of speeding traffic up and down Springfield Avenue and Cannon Hill Lane including a preponderance of motor bikes and motor scooters (many displaying ‘L’ plates and belonging to fast food delivery companies). To reiterate, I do hope that the proposal bears fruit.</td>
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<td><strong>No Address</strong> ES/20MPHphASE5</td>
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<tr>
<td>I support this proposal with regards to the roads in this Phase in and around Dundonald Ward. Millions people already live in towns where the default speed limit is 20mph – and the evidence suggests that this cuts the overall/average speed of traffic, reduces injuries and damage from accidents, and lowers pollution. A Transport Research Laboratory study found 20 mph limits cut child pedestrian accidents by 70%. And in 2008, the Parliamentary Advisory Council for Transport Safety found Britain’s annual 3,100-road death toll would be cut by two-thirds if all residential areas had 20mph limits. There is some suggestion that reducing speeds sees a reduction in fuel use, and heavy breaking – having a positive impact on air quality. There is evidence that slower speeds encourage more people to cycle and walk, which have additional environmental and health benefits. A borough-wide 20mph limit ‘default’ for residential roads is preferable to a piecemeal ‘each-road-for-itself’ approach that makes things very confusing for drivers, who find themselves driving in and out of 20mph limits and zones. Enforcement is a concern, but the evidence is that the lower speed limit alone will result in reducing average speeds,</td>
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which brings the benefits outlined.
I hope that Merton will consider an advertising campaign to support the changes in speed limits.

**Graham Road** _ES/20MPHPHASE5_

I am writing to express my general support for the proposal to introduce 20 MPH speed limits on Merton roads that are primarily residential, however I have some reservations about the proposal for some non-residential roads such as the A298 Bushey Road which is currently 40MPH.

I also have a question about enforcement. What plans are there to enforce the 20 MPH speed limit to ensure the benefits of the reduced speeds are realised?

**Burstow Road** _ES/20MPHPHASE5_

We thoroughly welcome this 20mph speed limit and are delighted that such an extensive roll-out is proposed.

But how will it be enforced? Burstow Road is already sign-posted with a 20 mph limit but most vehicles travel down it at 30+ mph. Will it take serious injury or worse to enable traffic-calming to be introduced?

**Abbott Avenue** _ES/20MPHPHASE5_

I fully support the introduction of 20 mph limits on residential roads. I question the appropriateness of this for major through roads such as Bushey Road, Kingston Road, Grand Drive etc, where I would rather see zero tolerance of the existing 30mph limits.

**Graham rd** _ES/20MPHPHASE5_

I fully support this measure. It will improve road safety, particularly for cyclists and pedestrians. However regular monitoring and enforcement, plus a big education campaign at the start, will also be necessary for it to mean anything more than numbers painted on the road.

**Hartfield Road** _ES/20MPHPHASE5_

I am writing to express my full support for this proposed (and long overdue) traffic speed reduction measure. As a resident of Hartfield Road, every day I observe drivers “putting their foot down” as they exit the restricted speed zone of Sir Cyril Black Way and head down the long straight section of Hartfield Road towards Kingston Road at considerably more than 30mph. I am constantly surprised that there hasn’t been a serious accident as a result of the speed some drivers travel down this road. Interestingly, vehicles rarely exceed the speed limit in the other direction (towards Wimbledon town centre).

Whilst I won’t hold my breath that the limit will be properly observed (many/most vehicles exceed the speed limit on The Broadway and Sir Cyril Black Way), I hope it will bring down the average speed and make the local roads safer for everyone.

**Edna Road** _ES/20MPHPHASE5_

We wish to offer full support to your proposals to limit the speed of vehicles to 20mph in roads which include Edna Road, where we reside. It will make ours and other roads in Merton, much safer for pedestrians and cyclists and will also contribute to decreasing the severe air pollution currently experienced.

We have checked the site which offers measured air quality for our road and are shocked to find significant air pollution registered annually at 32 mcg/ cubic m of nitrogen dioxide, due mainly to vehicle emissions.

Of even greater concern are the emission levels in local Kingston Road, currently 40.21 mcg/cubic m of nitrogen dioxide, annually, which exceeds the World Health Organisation legal limit of 40 mcg/cubic m.

In addition to reducing the speed limit, we also urgently ask you to reconsider the current parking arrangements in Kingston Road, where in recent years, parking spaces have been created over both pavement and cycle lanes, which goes against Merton’s own policy to prioritise and encourage more safe pedestrian and cycle activity in the Borough. Pedestrians are further endangered since there are no protective bollards in place between the pedestrian and parking sections on the pavement. Parking difficulties encountered driving up and over a raised pavement is also likely to generate more not less air pollution.

We would also urge your department to liaise with Environmental Health/planning & buildings control to consider limiting building works to Monday to Friday only, as in other London Boroughs. Whilst major construction works, generating noise/dust/vibration pollution, clearly produce revenue for the council, the current ease with which contractors can flout current Merton Regulations, & Merton’s Construction Code of Practice, with works frequently being conducted weekends and Bank holidays, with deliveries requiring HGV’s idling for long periods of time in the middle of roads, presumably required to operate cranes or wet cement ejection, is all of deep concern.
<table>
<thead>
<tr>
<th><strong>Representations</strong></th>
<th><strong>Objection</strong></th>
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<tbody>
<tr>
<td><strong>Arundel Avenue</strong> ES/20MPHASES</td>
<td>I am not in favour of the blanket 20 mph restrictions being applied to Merton. Martin Way/Bushy Road and Hill cross Avenue are main roads which need to have traffic moving quickly. In the side roads, it seems sensible to have 20mph but all this comes at a cost of changing signs, and employing people to enforce these restrictions. Can the Council afford this when everything else is being cut back?</td>
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<tr>
<td><strong>Westcroft Gardens</strong> ES/20MPHASE5</td>
<td>I strongly object to the speed limit on main roads being reduced to 20 mph, in particular the roads local to me – Martin Way, Bushey Road, Kingston Road, Grand Drive, etc. This will have a serious effect on journey times as well having no effect on accident rates. In the case of Bushey Road, with traffic coming off the A3 at 50 mph, it’s likely to have a negative effect with regard to safety. Are there any accident figures to justify reducing the speed limit on main roads, and has any research/analysis been carried out on the consequences?</td>
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<tr>
<td><strong>Southway</strong> ES/20MPHASE5</td>
<td>I would like to register my views regarding the proposed blanket implementation of a 20mph speed limit. This is an appalling abuse of local government power. Whilst the main roads are heavily congested most of the time, and the speed limit will therefore have little impact, there are people who have to travel to work at unsocial times. Why should these people be penalised with a 33% longer commute? Crawling along at 20mph will NOT reduce energy emissions / improve efficiency - quite the opposite. (See <a href="http://www.mpgforspeed.com">www.mpgforspeed.com</a> for simple graph). Also, if there is no differentiation between side roads and main roads, where is the impetus to travel on the main roads (which is after all what they are supposed to be there for). To include roads such as Bushey Road, Grand Drive etc in this plan is inappropriate and irresponsible. Lastly, can we be assured that there won’t be multiple speed cameras set up on roads that can clearly cope with 40mph traffic (let alone 30mph or 20) simply to create revenue. Please can you confirm receipt of this message, and assure me that it will be passed on to relevant parties.</td>
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<td><strong>No Address</strong> ES/20MPHASE5</td>
<td>I must express my disbelief when I heard of the proposed 20mph blanket speed limit. To put it bluntly in my opinion it is stupid. I can understand 20mph on side roads, I have no problem with that, but to includes main roads that are used as through routes by traffic is non-sensible. You are creating an environment on main roads that will not be familiar or acceptable to the majority of non Merton traffic. This will cause dangerous situations and the potential for road rage. This is already happening in Hillcross Avenue where there is a 20mph alongside Hillcross school. What do you imagine is going to happen along Bushey Road, a dual carriage way with two lanes either way with some vehicles attempting to be legal at 20mph while competing for road space with others traveling at 40mph or more. It is a recipe for disaster. Similar problems in my opinion will happen in Martin way, especially late at night where dangerous overtaking will take place. I also cannot see any argument for this lowering pollution. Indeed logically it may even go up. vehicles will take longer to travel the same distance, yet they will probably be in a lower gear and thereby produce the same pollution but for a longer period. I would be interested to see if you have any scientific proof that you have supporting anything different. Lastly I have to say I am beginning to question some of the logic that is coming out of Merton Council and the way they are forcing change on the local population. This is not healthy and can only lead to conflict situations in the future.</td>
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<tr>
<td><strong>Merton Park</strong> ES/20MPHASE5</td>
<td>I object to 20mph restrictions on main roads. This will lead to even longer traffic jams with associated pollution. I do not object to 20 mph restrictions on residential roads.</td>
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<tr>
<td><strong>Merton Park Ward</strong> ES/20MPHASE5</td>
<td>I am writing to object to the proposal to introduce the 20 mph speed limit on all roads within the Merton Park Ward. Transportation is an important infrastructure. It is not clear what the evidence is that supports the motivation for adopting a universal 20 mph speed limit on all roads within the Borough. The desire to have traffic moving at a steady, but slower speed is rather fanciful given that there are inevitably time and location related peaks and troughs in traffic flows. I can understand variable speed limits, which have been introduced on motorways and I would not be averse to a scheme which achieves this - there is no point in rushing to reach the next traffic jam. However, imposing artificially low speed limits in situations where not required is not likely to be beneficial for motorists and as the speed surveys have shown does not have much of an impact on safety.</td>
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<td><strong>No Address</strong> ES/20MPHASE5</td>
<td>I wish to object in the strongest terms to the proposed Order, reducing the speed limit to 20mph borough wide for all but a small section of Bushey Road (currently restricted to 40mph). I understand that there are some benefits to reducing the speed of motor vehicles on residential roads. However, I think...</td>
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the blanket application to all other roads in the map given is an undue restriction. Particularly to main roads indicated which are TFL red routes, but also all other main roads.

During busy times, the amount of traffic restricts the speed at which traffic moves. At other times when the roads are clear I believe it is appropriate to maintain the current 30mph restriction; 40mph on the Bushey Road dual carriageway section.

Lowering these limits in my view, would be an unwarranted restriction of an ordinary activity, driving a car within nationally set urban speed limits. It is a low, tedious and inefficient limit for larger roads which will be generally ignored, judging by the speed that cars travel on the larger residential roads locally, which are already 20mph. This brings the Order into disrepute and ridicule.

A local education campaign about safe speeds and careful driving within the current speed limits would, in my view, be of greater benefit.

No Address

I wish to object to the proposed 20mph speed limit planned within Merton please. Looking at Merton’s website, I would like to reply to the first two sentences on the Traffic management consultations page: “We introduce traffic management schemes to solve problems relating to safety, parking, the environment, damage to structures and the movement of traffic.”

At a time when CO2 emissions and the environment are very much in the spotlight, has Merton considered the wide range of research which shows that reducing the speed limit from 30 to 20mph can increase CO2 emissions by over 10%? Engines will be running for a longer duration and rev's will be higher while driving in a lower gear.

The below link provides a good introduction to this: http://www.theaa.com/public_affairs/news/20mph-roads-emissions.html

“We also aim to promote cycling, walking and use of public transport, and to bring benefits to all members of the community.”

I believe if this change happens it has the very real potential to make cycling more dangerous. At the moment, cyclists generally ride beside the kerb and are overtaken on the outside by vehicles. There are many cyclists who ride at speeds of over 20mph – especially those on road bikes where 25mph is easily achievable. To have a 20mph limit will mean that many cyclists will be able to overtake (albeit slowly – which makes it even more dangerous) other vehicles on the road. If there is not enough space for to do this beside the kerb (bearing in mind you need more space to overtake a moving vehicle than one that is stationary), this means they are more likely to overtake on the outside – moving out to the middle of the road and closer to oncoming vehicles. My concern is that this will increase the risk of accidents involving cyclists. Even if a vehicle were travelling at 20mph, if it had a head on collision with a cyclist – the combined impact of 40+ mph does not bear thinking about.

I do not understand how reducing the speed limit on the roads promotes walking on the pavement. It could be argued that reducing the limit will make it more likely for pedestrians to cross the road where vehicles are free flowing and not feel the need to use pedestrian or zebra crossings.

Regarding public transport, I understand there are approximately 38 bus routes that run through the Borough. To reduce the speed limit, meaning that buses can no longer travel at over 20mph, means that journeys will obviously take longer. I know it is unusual for buses to reach 30mph between stops, but they certainly travel over 20mph. Will bus timetables be changed to reflect these (longer) bus journeys? Will more buses be put on the road to reflect the longer waiting times in between stops? If so, this will increase emissions, as set out above. I estimate that a bus journey that currently takes 50 minutes will take about 1 hour. If not, do Merton accept there will be less capacity to carry bus passengers during the course of a day? If so, how is that promoting public transport?

This consultation was only brought to my attention by my local Residents Association. Reading through the information on Merton’s website, which was not that easy to find, the thing that struck me the most was the very low numbers of responses you have received to the 4 phases that have so far been completed of this consultation. I see that only 9 responses have been published. 6 of these were for phase 1 – Pollards Hill and 3 were for phase 3 – Mitcham. Nothing is published for phases 2 and 4. Considering this affects the vast majority of people who use transport within a borough of over 200,000 people, plus the number of non-Merton residents who travel through Merton, I find the number of responses staggering.

I see that a notice was placed in the local paper – which I understand is a legal requirement. I also read that the Emergency services were consulted on this and they did not object. Which of course they would not do – as they do not need to obey the speed limit. Emergency vehicles travel as fast as they safely can to reach their destination.

As I am objecting to phase 5 of this consultation, can phase 6 please be widely advertised, such as on the front page of Merton’s website and on Twitter? I have looked through Merton Council’s Twitter feed and I could not find any mention of this consultation – I did find links to other consultations. If this is not possible, can I ask why not? I believe the Council would receive far more responses if these plans were widely brought to the public’s attention.

No Address ES/20MPHPHASE5

This email is me voicing my concerns about making large portions of Wimbledon/Raynes Park a 20mph zone.

- Firstly, although the area is a 30mph zone it is a rare occasion that cars will be driving at these speeds in the day or even the evening. The area can become very built up with traffic which brings speeds down to around the 20mph mark. The email is my voicing my concerns about making large portions of Wimbledon/Raynes Park a 20mph zone.
regardless.
- 20mph Zones bring ‘Clock watching’. Where there is a 30mph zone rarely is someone watching their dial to ensure the limit is being reached. But in a 20mph zone because it is so uncommon for someone to do that speed people will have eyes on their speed dial. Would this not be classed as the same kind of attention loss as looking at a phone/GPS?
- 20mph zones bring tension and impatience with drivers. Drivers who adhere to the limit will feel pressured by tailgaters and this can anger drivers and cause road rage.
- In my 20 years I’ve lived in this area (22 now) accidents and incidents have been rare. Only real accidents I’ve seen have been because of the bridge off Lower Downs Road.
- For young black box drivers this will risk their insurance being cancelled if they fail to adapt quickly to the new roads, roads that they’ve been using for years and suddenly a 30cm x 30cm post saying 20mph means they are over the speed limit and under more pressure so look for road signs, taking their attention off the road.

**Cambridge Road** ES/20MPHPHASE5
I object very strongly to this limit which will simply encourage law -breaking, damage relations with police, increase air pollution and create untold and unnecessary irritation on the majority of motorists. Where there are specific danger spots eg near schools, then go ahead. Modern cars are not designed for this.

**Fairway** ES/20MPHPHASE5
I believe the proposed 20 MPH limit is pointless and unnecessary. We’ve lived with 30 MPH limit for decades and there is no reason for a change. Please stop this madness.

**No Address** ES/20MPHPHASE5
This proposal is very bad indeed: It will slow down the vehicles that convey people to work; It will punish people travelling safely at slightly quicker speeds; It will allow cyclists to ride faster than 20mph.

It is rather like trying to make people healthier by coating their arteries with cholesterol in order to slow them down. It will be yet another nail in the coffin of the UK economy.

No doubt it will raise a lot of money without having to raise the rates of taxation, but it may be a somewhat cynical way to do so. There is currently no end to the depressing news coming down to us from authorities.

**Officer’s Comment**
Merton is committed to road safety and we have a number of initiatives that promotes road safety and to improve road environment and perception of safety. One initiative is the introduction of a borough wide 20mph speed limit which is in line with the Mayor of London’s transport priorities which has been adopted within the Borough’s LiP.

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 limit will work alongside neighbouring borough's 20mph speed limits. This is expected to bring about a culture change so that it is socially unacceptable to drive over 20mph in London.

In terms of benefits, there have been many assessments and research carried out that sets out collected data and pros and cons. These reports are readily available on various websites including TfL’s website. Although it may take some time, it is considered that with a change in behaviour, there will be less aggressive driver behaviour; less likelihood of accidents; lower severity of any accident and risk; improved perception of safety; safer highway environment to be experienced by 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, road users 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.

Almost every road in Merton is residential including main roads which accommodate residential units; retail; much heavier traffic (both vehicular and pedestrians); more activities on the highway which means a greater risk to greater number of 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. A borough wide 20mph speed limit would also be less confusing for drivers; it also means far less signs that would be required when a speed limit changes along sections of the carriageway.

As per all our schemes, we do consult the emergency services including the Police. The Police are fully aware of the various London wide proposals for introducing 20mph speed limit and they have been enforcing the speed limit. It is acknowledged that they do have other priorities and level of enforcement is unlikely to increase but that that does not mean that boroughs stop implementing what is considered to be 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 20 or 30mph. This is evidenced given the volume of complaints we receive on an annual basis regarding excessive speed. A change in behaviour is therefore key and more likely to be achieved by a borough wide 20mph speed limit.

The concept of a 20mph speed limit has been Merton’s aspiration for several years; it has also been a political manifesto for many years. Additionally, as a London borough we are obligated to deliver our LiP which is also based on the various policies as set out by Mayor for London.

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 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 wish to take part in the Community Road Watch which is an initiative set up by TfL and the Police.

It is appreciated that introducing the project in phases may be considered as a piece meal approach and that there is a demand for a borough wide 20mph speed limit, however, the Council can only deliver schemes within the limited available funding and resources.

A lower speed limit will help reduce the actual and perceived danger and it is recognised that a lower speed reduces the number and severity of accidents.