

## **Supplementary Report**

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

**Date:** 6<sup>th</sup> September 2018

**Agenda item:** N/A

**Wards:** Village

**Subject:** Church Road and High Street Wimbledon Village– 20MPH Speed Limit

**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:** Abobaker Abdalla 0208 545 3690

**Email:** Abobaker.Abdalla@merton.gov.uk

### **Recommendations:**

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

- A) Considers this report as a supplementary report to of the same heading dated 21<sup>st</sup> August 2018.
- B) Considers the representations (that were not reported in the previous report) to the statutory consultation that was carried out between 21<sup>st</sup> of June and 13<sup>th</sup> July 2018 on the introduction of a 20mph speed limit to include Church Road, High Street (between the War memorial and its junctions with Ridgway / Wimbledon Hill Rd / Belvedere Grove); Courthope Rd; Walnut Tree Cottis; Belvedere Square; Old House Close; Lancaster Road (between Church Rd and Lancaster Rd); Haygarth Place and Allington Close as shown on plan No. Z73-21-01 attached in Appendix 1. Representations are detailed in Appendix 2.
- C) Agrees to overrule the objections and retain the previously made decision to proceed with the making of the relevant Traffic Management Orders (TMOs) and the implementation of the proposed measure as shown in plan No. Z73-21-01.
- 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 representations that were received during the statutory consultation but due to administration errors were excluded from the previous report of the same title dated 21<sup>st</sup> August 2018.
- 1.2 It seeks approval to proceed with implementing the decision that was made on 22<sup>nd</sup> August 2018 (attached as appendix 3)

## **2. BACKGROUND**

- 2.1 Wimbledon Village is one of Merton's key local centres that attracts visitors and enjoys high level of pedestrian activities. With an emphasis on improving the general experience and perception of road safety, Merton Council in collaboration with Wimbledon Village Business Association and a number of local stakeholder groups and societies have identified the impact of through-traffic as a negative factor in the Village. The High Street

is a London Distributor road, bus route and the primary emergency route. Whilst the volume and nature of traffic cannot be controlled, the speed and perception of speed can be addressed via the introduction of a localised 20mph speed limit.

- 2.2 The Council commissioned 24/7 traffic surveys that were carried out between 20<sup>th</sup>– 26th May 2018. The data that is attached in Appendix 4, shows that the average speed and the 85% speed of traffic on the High Street and Church Road travel under the current speed limit of 30mph.

### **3. PROPOSED MEASURES**

- 3.1 To improve the general road safety environment, it is proposed to introduce a 20mph speed limit along Wimbledon Village High Street and some branching roads. Church Road (in part) is already subject to 20mph and therefore the inclusion of the entire length of Church Road is considered to be appropriate. The extent of the boundary is shown on plan No. Z73-21-01 attached in Appendix 1.
- 3.2 The proposal would include the installation of a number of signs throughout the affected roads and '20 roundel' markings. Some of the road markings in the area will be refreshed. Where possible existing lamp columns and 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 21<sup>st</sup> June and 13<sup>th</sup> July 2018. 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 known resident and business associations and Ward Councillors.
- 4.2 The consultation resulted in a total 21 representations of which four were reported within the previous report upon which a decision was made to proceed with the introduction of the 20mph speed limit. Regrettably, due to some administration error, seventeen representations were excluded from the previous report which has necessitated the need for this supplementary report. The unreported representations are detailed in Appendix 2 along with officer's comments.
- 4.3 All Emergency Services have been consulted and no objections have been raised.
- 4.4 Village and Hillside Councillors were advised of the consultation.

### **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 2018 / 19 financial year.

### **6.0 ALTERNATIVE OPTIONS**

- 6.1 Do Nothing. This, however, would be contrary to the Council's current practice in introducing localised 20mph speed limits in areas with high footfall, areas of interest and areas outside schools.

- 6.2 To include the whole area within the 20mph speed limit. Given the current level of available funding, it is not possible to extend the proposal at this time. However, it is important to note that the Council does have an aspiration to introduce a borough wide 20mph subject to identifying the required funding. Meanwhile the Council will continue to introduce localised 20mph speed limit in key areas.

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

- 7.1 The cost of implementing this scheme is estimated at £20k. 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 2018/19.

## **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); and for a zone Section 84 of the Road Traffic Regulation Act 1984 (as amended) and the Highways Act (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 Z73-21-01

Appendix 2 – Representations

Appendix 3 – Decision sheet dated 22<sup>nd</sup> August 2018

Appendix 4 – Speed Survey



**NOTES**

1. ALL DIMENSIONS IN METRES U.G.S

**KEY**

- 30MPH SIGN 600# ON LAMP COLUMN (190)
- 30MPH SIGN 600# ON NEW POST (190)
- 20MPH SIGN 600# ON LAMP COLUMN (190)
- 20MPH SIGN 600# ON NEW POST (190)
- 30MPH SIGN 400# ON LAMP COLUMN (100)
- 30MPH SIGN 400# ON NEW POST (70)
- 20MPH SIGN 400# ON LAMP COLUMN (28)
- 20MPH SIGN 400# ON NEW POST (70)
- NEW POST (80)

Notes  
Do not scale from this drawing

Rev	Revisions	Drawn	By	Date	Checked	By	Date	Appr	By	Date

**Sustainable Communities**  
environment & regeneration

TRAFFIC & HIGHWAYS

Drawn by	AA	By		Date	MAY 18
Checked by		By		Date	
Approved by		By		Date	

PROJECT  
**VILLAGE - WIMBLEDON**  
**20MPH SPEED LIMIT**

TITLE  
**GENERAL ARRANGEMENT**

**merton**  
Merton Civic Centre  
London Road  
Morden, Surrey  
SM4 5DX  
www.merton.gov.uk

Drawings: Z73-21-01

Revision: -

Classification: DRAFT

Scale: 1:1250





**LONDON BOROUGH OF MERTON**

**PROPOSED 20 MPH SPEED LIMIT IN HIGH STREET, WIMBLEDON, CHURCH ROAD, SW19 AND  
VARIOUS ADJOINING ROADS**

**THE MERTON (20 MPH SPEED LIMIT) (NO. \*) TRAFFIC ORDER 201\***

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:-
  - (a) impose a 20 MPH speed limit in the roads or lengths of roads specified in the Schedule to this notice;
  - (b) revoke the Merton (20 MPH Speed Limit) (No. 9) Traffic Order 2017 and re-apply its provisions.
3. A copy of the proposed Order and other documents giving more detailed particulars of the Order, including plans 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, Surrey or at the Wimbledon Library, 35A Wimbledon Hill Road, Wimbledon SW19 7NB.
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/VILLAGE20MPH/2** no later than **13 July 2018**.

Dated 21 June 2018.

Paul McGarry  
Head of futureMerton  
London Borough of Merton

## SCHEDULE

Allington Close;

Belvedere Grove, from its junction with High Street, Wimbledon north-eastward for distance of 15 metres;

Belvedere Square;

Church Road, between the northern kerb-line of St Mary's Road its junction with High Street, Wimbledon;

Courthope Road;

Haygarth Place;

High Street, Wimbledon; the east to west arm, from the common boundary of Nos. 2 and 3 High Street, Wimbledon to its junction with Parkside;

High Street, Wimbledon, the south-west to north-east arm;

Lancaster Road, the north-west to south-east arm;

Old House Close;

Parkside, between its junction with High Street, Wimbledon and the common boundary of Nos. 3 and 4 The Green;

Wimbledon Hill Road, between the common boundary of Nos. 116 and 118 Wimbledon Hill Road and its junction with High Street, Wimbledon.

Support**Church Road**

Ref: **ES/VILLAGE20MPH/2**

I am writing in relation to the proposed 20 mph speed limit on High Street, Church Road and other adjoining roads in SW19. As a resident of Church Road I would like to add my support to this proposal for the following reasons:

1. The stretch of Church Road included in this proposal is residential. Entering and exiting driveways can be dangerous when drivers speed excessively, especially as they come round the corner by St Mary's roundabout towards the Village.
2. The pavements along this stretch of Church Road are narrower than average and in quite poor condition. In some sections the camber seems quite steep. And furthermore, there is high proportion of dropped kerbs. All of these factors mean that pedestrians are more exposed to traffic, in particular the many children and elderly in the community, not to mention the thousands who visit during the tennis weeks.
3. The stretch of Church Road in the Wandsworth borough has a speed limit of 20mph and so it doesn't make sense for the speed limit to increase as the road approaches the village as it currently does.
4. The high street in Wimbledon Village has a high level of pedestrian traffic which would benefit from a reduced, safer speed limit.

**Church Road**

Re Merton 20mph speed limit: ES/VILLAGE20MPH/2

Good afternoon

This is to say that we are very happy to see the proposal for a 20mph speed limit in the Wimbledon Village area in general and in Church Road where we live in particular. We have been in touch with Merton on this matter several times in recent years and are very pleased to see that action is being taken. The proposed 20mph limit has our total support.

Kind regards

**Belvedere Drive**

I support a principle of 20mph but on a more cohesive basis. Why would you not include other roads like Belvedere Drive which is a 30mph zone on a residential road which has become a rat run and highly dangerous for pedestrians at either end of the day. It seems illogical to introduce 20mph on a main through road but have 30mph on a road running off it.

**Lancaster Gardens****Re. the proposal for some roads in Wimbledon Village to have a 20 mph speed limit**

I welcome the introduction of 20 mph on some roads, but think that all roads in the area should be 20 mph. It is confusing for motorists to have to keep changing speeds and clutters the streets with signs.

It appears that Wimbledon High Street, Church Road, part of Lancaster Rd and The Ridgway will all be 30 mph. Vehicles should not be travelling at this speed along those roads as they pose a danger to pedestrians and cyclists, particularly as there are often very narrow pavements and lots of people walking including children and the elderly. I hope you will reconsider and apply 30 mph to all roads in Wimbledon Village.

Further to my response yesterday, I read this morning that Croydon has costed installing 20 mph across the borough and finds it to be

*"much more cost efficient over time than the previous programme of rolling out 20mph zones and limits in small*

streets at a time due to economies of scale and more targeted traffic speed”

See [https://www.croydon.gov.uk/sites/default/files/20mph\\_faq.pdf](https://www.croydon.gov.uk/sites/default/files/20mph_faq.pdf)

**14. How much will it cost and is it worth it?**

*Croydon plans to seek resident/business opinion across the whole borough over a three year period. To cover the full borough it will be necessary that the borough be split into five parts with each being considered at a time. It is estimated that each area will cost approximately £300,000 to implement. Assuming that all areas in the borough will support the proposal, to cover the whole borough the cost will be in the region of £1.5 million. Taking the average cost of a collision as £68,320 (DfT 2010), the cost of covering the full borough, approximately equals the cost which would be associated with just 22 accidents.*

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

**AGAINST**

**Marryat Road**

Further to the current proposal, reference above, to impose a 20mph speed restriction in the Wimbledon Village area, I am writing to register my concern and objection.

First of all, the general trend of 20mph speed restrictions is an ineffective and disproportionate response to alleviate whatever issue the Traffic and Highways department thinks has arisen. Unless there is a very specific reason for it, it is a waste of public money. Is there any evidence that requires this measure in the areas suggested?

Have more effective safety measures, which could be employed in the focused areas that require it, been reviewed?

For the speed limit reduction to be enforced, it needs to be policed. Certainly, the 20mph speed limit between Wimbledon Lawn Tennis and Southfields is not observed, even by the buses, and I suspect the police do not have the resource to monitor this, particularly when there are other more pressing crimes such as burglary, which is on the rise in the area, demanding their attention.

There is also a genuine risk that car satnavs will divert unnecessary traffic through hitherto quiet residential streets so as to avoid perceived delays owing to speed limit restrictions.

**Peek Crescent**

I wish to object most strenuously to the above proposal on the following grounds:

1. No consideration has been given to the impact on surrounding roads not subject to a 20-mph speed limit. It is highly likely that traffic will be displaced, either directly or via Satnavs, to avoid potential blockages thereby increasing traffic flows on the surrounding residential roads in the neighbourhood. As usual no holistic modelling of the impact of this speed limit on the wider area around the Village seems to have been undertaken. This is reminiscent of the fiasco with the Belvederes where the same



mistake was made and subsequently council taxpayers money had to be spent removing speed restriction measures. Parallels can be drawn with Wandsworth Council who do take a holistic approach to speed restriction measures

2. The decision seems already to have been made – a fait accompli – without any prior consultation. This is totally undemocratic and against all the principles normally practised by the Council. There has been no prior discussion with Residents' Associations about this proposal, nor is any supporting evidence or professional advice being offered from Officers on the efficacy or the likely impact of the scheme
3. The measures will only add to the proliferation of road signs around the village adding to confusion for motorists
4. Most importantly there is no need for these measures. Traffic through the Village already slows to a trickle to avoid parked lorries, busses at the bus stop, traffic lights, pedestrian crossings and the two roundabouts, one at each end of the village.

So in summary an unplanned, unwanted by residents, change with unpredictable outcomes and a waste of tax payers money is being proposed at the behest of a small group of interested parties.

#### **Atherton Drive**

I live on Atherton Drive, which is within the Parkside Residents Association area. Atherton Drive is a small dead-end street off Burghley Road. I object to the above proposal on the following grounds:

- 1) Lack of supporting evidence or assessment of impact on neighbouring areas
- 2) It is undemocratic not to have a Consultation
- 3) The lack of transparency, and no consistency in the Council's approach to traffic management
- 4) Negative impact on a Conservation Area
- 5) Lack of enforcement of proposed 20 mph speed limit.

I strongly encourage you to propose an inclusive solution to the traffic in the Village, with a proper, democratic consultation.

#### **Marryat Road**

With reference to your proposal to reduce the speed limit, I cannot see the point in introducing a 20 mph speed limit at all. During the course of the day, you are lucky if you can get above 20 mph as a matter of course. If a 20 mph speed limit is introduced, this will mean that later in the evening, when it is perfectly sensible to travel at 30 mph, motorists will be issued with fines for travelling at a perfectly acceptable speed for the road conditions, i.e. up to 30 mph. As Merton are already getting a speed that they want us to travel at without a compulsory restriction in the day, then I think that they should allow traffic to find its own speed up to 30 mph – in other words, no 20 mph speed limit at all.

As for Church Road, the highest speed that one can usually achieve here is 10 mph!

I hope you will take my views into careful consideration when reviewing the speed limits in the Wimbledon Village area.

#### **Alan Road**

This has to be one of the most ridiculous proposals ever, when can the traffic in Wimbledon High Street and Church Road ever get above 20mph? perhaps between the hours of 02:00 to 06:00, this is a waste of money and would result in a huge amount of additional street furniture when I thought Merton were trying to reduce this.

Please see some sense and put resources into more appropriate things such as stopping the rat-running in the Belvederes which Merton Council created with its measures at Wimbledon Hill/Woodside/ Alwyne and Compton roads.

## Parkside Gardens

Why oh why have the powers that be decided to have a consultation during these dates that include the Wimbledon Tennis Championships and the end of the school term?

There is nothing normal in Wimbledon during these two or three weeks of the year (three includes the extra traffic of taxis and cars transporting qualifying players and championship players arriving for practice and set up at AELTC).

The period of consultation also includes reduced school traffic as so many children in the Village area are away on study leave, school field trips or term has already ended in several cases prior to the end of the consultation process.

## Parkside Gardens

Dear Sirs, I am writing in connection with the above to express my objections.

To introduce a 20 mph zone in such a major road without presenting any evidence is an outrage and deprives residents of their democratic rights. The impact of displacement on adjacent roads and the risk of increased congestion has not been addressed and needs wide discussion. Which vested interests have pushed for this and why are the Council afraid to discuss wider issues arising from it? Issues of this kind which have a huge impact on residents must be carefully assessed and decisions cannot be arbitrarily imposed by a narrow set of officers without any supporting data. The proposal seems to rest on a perception of traffic flow which is at best totally subjective and seems to reflect very narrow interests. Why are the opinions of unidentified "stakeholders" deemed more important than residents?

The proper channel for this proposal is Residents' Associations and it is not acceptable that they were ignored and we seem to have been presented with a *fait accompli*.

## Marryat Road

The above scheme to introduce a 20mph speed limit in Wimbledon High Street has been drawn to my attention. I am concerned about the method of introducing this measure as well as the measure itself, as a resident of Marryat Road which is affected by the proposals.

1. **no informal consultation** with nearby residents or my Residents' Association has been undertaken as is customary. I note that businesses have been consulted, and commercial reasons are given for the decision.

It is only right that other interested parties, such as residents, and Residents' Associations, are also given an opportunity to express their views.

2. **no professional advice on the efficacy of the scheme** has been produced in support.

3. the plan has been introduced as a ***fait accompli***. This is undemocratic.

4. traffic management in the Village has been **contentious** for decades. Residents' Associations have on the whole worked tirelessly for a holistic approach to traffic issues, and this imposition of a speed limit without consulting them is detrimental to the work done in the past to work harmoniously with our neighbours.

**This lack of proper process is of concern and should be rectified by putting these plans on hold and undertaking a proper consultation.**

With regard to the measure itself, of course safety is paramount, but I do query whether this speed limit is necessary.

(i) as a daily user of the High Street as a pedestrian and car-driver, I am not aware that excessive speed is a problem in the Village.

Due to presence of three sets of Pelican crossing traffic lights which are in frequent use, as well as the roundabout in the centre of the High Street, and also the natural bend in the road and roundabout at either end of the entrance to the High Street, getting up speed is not, in my view, easily achieved. And in Church Road and Belvedere Grove, the presence of parked cars, and the need to give way to oncoming traffic, also keeps speed down. What are the results of the Council's **traffic surveys** in this regard and they should be made available for inspection, as well as professional opinions on the efficacy of the proposed speed limit.

(ii) consideration should be given to the **effect on neighbouring residential roads**, of this Proposed speed limit and in particular Marryat Road and Burghley Road. Both these roads are cut-throughs

and are at risk of suffering from speeding traffic avoiding the 20mph zone. Thus displacing the perceived speeding problem. With The Study school near the top of Marryat Road, this is of great concern to parents and children using Marryat Road.

(iii) I am concerned about the very **excessive road signage** and street painting which will be required to implement the speed limit. This will be detrimental to the environment and street scene and introduce a more urban feel to the Village, whose semi-rural character is worth preserving.

In summary, **I object to the proposal being introduced without an informed debate and ask the Council to implement a full consultation supported by results of surveys and professional opinions.**

### **Marryat Road**

I am writing to register my objection to the proposal to introduce a 20mph limit in Wimbledon Village. There has been no consultation with any Residents' Association in the village area. Where is the evidence that this speed limit is necessary? How will the speed limit be enforced? I doubt that the police have enough resources to enforce this limit as they are struggling to deal with much more pressing crimes. New signage will need to be installed which is costly. If this speed limit is introduced in the village no doubt it will have a knock on effect and move traffic to the surrounding roads causing more 'rat runs'.

As a regular user of the stretch of road between the Wimbledon Lawn Tennis Club and Southfields where a 20mph speed limit has been introduced very few drivers appear to adhere to this limit including the buses. In my view, this is a costly exercise and a waste of public money and should be abandoned. The Council is under severe financial pressure and the money could be used more efficiently.

### **Burghley Road**

Please note that I object to the introduction of a 20mph zone on the High Street.

1. The residents have not been consulted on this.
2. As an active campaigner to reduce speed of cars on Burghley Road, I can only see this as worsening the volume and speed of traffic on all residential roads around the village.
3. I wonder how often vehicles can/do actually go faster than 20mph given the volume of traffic which you state cannot be changed.
4. This is a costly and slapdash introduction for merely a 'perception' of lower speed.

### **Marryat Road**

RE: ES/VILLAGE20MPH/2

I am a long term local Wimbledon Village resident (1977). For many years I have been part of a campaign to reduce traffic speeding in residential areas. I cannot believe the **undemocratic way** this particular scheme is being imposed ignoring local opinion in the surrounding area. No attention seems to be given to the holistic area approach we have been advocating in many organisations.

Displacement of 20MPH traffic to 30MPH roads is an obvious consequence in any such scheme.

Enforcement of even the 30MPH local roads to date has not been seen implemented.

Marryat Road suffers from constant speeding and lately from motor bikes exceeding all speed limits.

Please consult with local residents, we are represented through WURA, The Wimbledon Society and local Residents Associations, there is a lot of experience and knowledge gathered over the years. We look forward to you including the views of our representatives.

**AGAINST - no address provided**

Dear Sirs,

Having applauded the wise decision taken by Merton Council with regard to not limiting traffic flow within The Belvederes, we are astonished at this latest initiative to arbitrarily propose a 20mph limit through the village centre without appropriate consultation. Altering traffic regulation in one road will inevitably have a negative consequence on the entire surrounding area and it is complacent in the extreme to disregard this. The Council is well aware that roads throughout the Village network are finely tuned and interdependent, hence your own recent decision not to limit traffic flow in The Belvederes because of the consequential effect elsewhere. It might be useful for you to look back at the statistics you collected from that consultation.

Speeding traffic is a familiar sight down all side roads, particularly those without speed bumps and your 'perception' based proposal will actively encourage this! Many of us loyally support village businesses but as they are not the only ratepayers we would suggest that you reflect upon the negative impact of your proposal which will undoubtedly result in a 'need based' demand for a significant extension of the 20 mph limit to many other roads. Frankly....it's like opening a can of worms. We look forward to a proper and wide consultation on this important matter.

Having carefully examined the schedule and plans regarding these proposals, I would like to make the following observations:

1. Allington Close, Haygarth Place, Belvedere Square, Old House Close, Rectory Close and Welford Place are ALL small residential CUL-DE-SACS. Where parking is allowed, it is limited to residents only so that, apart from them and their visitors, very few vehicles require access at all. The very narrowness and shortness of these roads ensures that motorists are highly unlikely to exceed 10 - 15 mph maximum. A 20 mph restriction is pointless.

2. Courthope Road and Lancaster Road are both virtually one way streets - both exit on to main roads with greatly narrowed one way exit points and, apart from parking, there is hardly any traffic. Cars are parked on both sides of these roads so that it is highly unlikely that any speed over 20 mph is currently achieved by vehicles on these roads.

3. The High Street and Church Road are already areas of considerable congestion with two bus routes on the former, one of the latter and traffic frequently backing up on the approach areas. Overall there are three sets of traffic lights on the High Street and a roundabout at the top of Wimbledon Hill, with Church Road providing a major intersection. Intermittent 20 mph areas will only further congest the area. Shop deliveries as well as the buses ensure that traffic proceeds through the entire area very slowly for the most part. Not long ago Merton Council suspended parking along Church Road and the High Street during rush hours in order to facilitate the flow of traffic. The proposed 20 mph areas will only exacerbate congestion.

4.. Motorists' attention will be drawn to the myriad signs and as the 20 mph restriction is intermittent it will introduce dangers from cars braking suddenly to conform with what may be an unexpected change in permitted speed. Engaging lower gears will increase the emission of noxious fumes. The damaging effects of diesel particulates upon the respiratory system has been long established and babies in their outward facing buggies at exhaust height are particularly at risk. Merton Council must surely be aware of this important negative effect of slowing traffic in shopping areas on main roads.

4. The provision of a plethora of signs - a number of which are planned on new posts, with possible road painting. - will seriously damage the visual environment of this Conservation area whilst doing nothing for safety, introducing more visual distractions for motorists. It will doubtless cost ratepayers a considerable sum. It was understood that the recent increase in the rates was to fund essential services and whilst road safety is important, these proposals represent a cavalier attitude to fiscal management by the Council.

Overall, these proposals are unwarranted, of no utility, expensive, hard to enforce and damaging to this Conservation area. In essence they show a sad lack of common sense and should be scrapped forthwith

## Officer's Comment

Many of the objections echo what has already been raised by one of the Resident Association whose representation was reported within the previous report. Many argue that the consultation should have been to an area wide debate and that the local community were not fully consulted. As previously reported, an informal consultation is not a legal requirement. An informal consultation is often carried out on proposed measures that some may feel would have a severe / adverse impact. These often include traffic calming and parking management. It is not normal practice to undertake informal consultation for measures of this nature. Even if the Council was to undertake an informal consultation, adopted practice is to only consult those within the identified area and those who are objecting within this consultation would not have been consulted during an informal consultation. Given the nature of the proposed scheme, it is considered that the level of consultation is appropriate. The only consultation that is required is a statutory consultation which has been carried as per legislation and as per previous similar schemes and consultation process.

It is noted that those within the proposed zone are supportive and objections are from those outside the identified area.

Merton Council is supportive of lower speed limits but at this stage due to insufficient funds, it is not possible to roll out a 20mph speed limit across the borough and in this instance we are not in a position to use the opportunity to include all the suggested roads that is currently outside the proposed catchment area.

In previous years Merton Council did introduce a series of 20mph speed limits and zones throughout the borough including some in Wimbledon village. At the time the subject was not debated with the local community and it was not subject to an informal consultation. It was the aspiration of the Council at the time to introduce as much as 20mph speed limits as possible within the financial constraints at that time. The project was paused primarily due to insufficient funds. At the time, a decision was made to undertake a full review of all the areas subject to 20mph prior to allocating further funding to roll out a 20mph speed limit throughout the borough. Following the completion of the review in 2014, it was concluded that the Council would concentrate its limited funding in areas with recorded personal injury accidents and outside schools and in town centres.

In recent years, however, some neighbouring boroughs have introduced borough wide 20mph speed limit which is also supported by the Mayor of London's new transport strategy. Although there is an expectation for the Council to consider a 20mph speed limit, the required funding has not been forthcoming. As a result, the Council has thus far concentrated on introducing localised 20mph speed limits primarily outside schools. There is, however, an aspiration to introduce a borough wide 20mph with the idea being 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's proposed 20mph 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.

To include other roads (as suggested by some representations) would mean a further statutory consultation and the cost of the required signs and road markings would be greater than the actual proposed area and given the limited available funding, it would not be possible to adhere to the request at this time. Additionally, by expanding the area, it would be difficult to stop at any given point as similar arguments would be made by those who would be excluded. At this stage, it is necessary to introduce the measures as currently proposed.

It is implied that drivers would divert into side roads because of a lower speed limit along the High Street. There is no evidence this would be the case. Changing speed from 30mph to 20mph increases travel time by 1 minute per mile, if one could drive at constant speed. However, the major delay during a typical journey is because of congestion, junctions, signals, pedestrian crossings, etc. Currently given the level of congestion and various activities along the High Street, any increase in rat run would be unlikely but minimum at worse. In fact many objectors acknowledge that it is difficult to speed along the identified road and that the speed is generally low during most part of the day. Formalising a lower speed limit should therefore have no/little impact on the surrounding roads. It is for the traffic Authority to consider a suitable action to achieve its objectives. And it is acknowledged that any changes to the highway, traffic and parking may have some impact on surrounding area, but impact is relative and given the low level of risk and the fact that the Council intends to pursue a borough wide 20mph speed limit, it is believed that the reasons provided for the objections are disproportionate.

In terms of justification, there are certain improvements that the Council can make that provides an enhancement and it is believed that improving perception of safety along the high street is an enhancement. This proposal is in line with the ultimate goal of having a lower speed limit across the borough.

With regards to street clutter, every effort will be made to minimise the number of signs and posts and where possible signs will be erected on existing lamp columns / posts. The signs that will be erected will remain in place if and when the area is expanded in due course and therefore will not be a waste of tax payer's money as suggested by some.

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 and given the various activities along the High Street during the day and evenings, the Council considers formalising a lower speed to be of a greater benefit than doing nothing at this stage.

With regards to the speed surveys, this was not meant to be a justification. Undertaking speed surveys are good practice and simply provides information that can be used to determine if engineering intervention would be required. It can also be used when making a request to the police for undertaking targeted enforcement.

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 this 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 within any given financial year. As previously mentioned, there is an aspiration for a borough wide 20mph speed limit, however, if / when progressed, it would likely be implemented over a number of financial years. Meanwhile the Council will continue to introduce localised 20mph speed limits at key locations.



# Speed Survey

# Appendix 4

Date of survey 20<sup>th</sup> – 26<sup>th</sup> May 2018

HIGH ST WIMBLEDON		Count	Average Speed	85 percentile speed	Length bins [m]				
Junction with BELVEDERE GROVE					1.5	6.5	8.5	10.5	14.0
					P/C Bike	Car	MGV	HGV	Artic/Bus
East Bound									
Total		52952	19	24.1	2649	46428	2913	740	222
West Bound									
Total		63364	16.1	21.8	2883	55165	3806	1254	256

Church Road WIMBLEDON		Count	Average Speed	85 percentile speed	Length bins [m]				
Junction with BELVEDERE AVE					1.5	6.5	8.5	10.5	14.0
					P/C Bike	Car	MGV	HGV	Artic/Bus
North Bound									
Total		22079	23.2	27.5	1271	18892	1734	144	38
South Bound									
Total		23738	22.8	27.2	1202	20425	1927	138	46

HIGH ST WIMBLEDON		Count	Average Speed	85 percentile speed	Length bins [m]				
Junction with MARRYAT ROAD					1.5	6.5	8.5	10.5	14.0
					P/C Bike	Car	MGV	HGV	Artic/Bus
East Bound									
Total		48029	24	28.5	1312	41821	4498	241	157
West Bound									
Total		59758	24.3	29.1	2747	51711	4691	455	154