**Committee:** Street Management Advisory Committee  
**Date:** 13th January 2009

**Agenda item:**  
**Wards:** Village

**Subject:** Ernle Road Area – Results of formal consultation on proposed 20mph limit  
**Lead officer:** Lyn Carpenter, Director of Environment & Regeneration  
**Lead member:** Councillor William Brierly, Planning & Traffic Management  

**Key decision reference number:** N/A  
**Contact officer:** Waheed Alam, Tel: 020 8545 3200,  
email: waheed.alam@merton.gov.uk.

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**Recommendations:**

That the Street Management Advisory Committee consider the issues detailed in this report and recommend that the Cabinet Member:

a) Notes the outcome of the formal consultation carried out during October and November of 2008 for a proposed 20mph limit for the roads shown on plan attached as Appendix 1.

b) Notes the summary of representations received and officers’ comments as detailed in Appendix 3.

c) Considers the objections against the proposed measures and the arguments for their implementation.

d) Agrees to proceed with the making of the Traffic Management Order (TMO) and the implementation of the proposed scheme.

e) Agrees to exercise their discretion not to hold a public inquiry on the consultation process.

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**1.0 Purpose of report and Executive Summary**

1.1 The purpose of this report is to inform the Street Management Advisory Committee (SMAC) the results of the formal 20mph consultation conducted between 23rd October 2008 and 14th November 2008 for the proposed Ernle Road Area 20mph traffic calming scheme and to request approval to proceed to implementation subject to the consideration of objections set out in Appendix 3.

1.2 This report also sets out officer’s responses to objections received from interested parties during the statutory consultation for SMAC to consider before making a decision on the scheme.
2.0 Details

2.1 Under the Borough 20 Plenty Plan 2008/09 programme, funding was secured, for a 20mph limit in Ernle Road, Wool Road, Dunstall Road and McKay Road.

2.2 The proposed scheme area is located in the ‘Village Ward’ and is bounded by Copse Hill and Woodhayes Road.

2.3 The aims of this 20mph scheme are to reduce rat running, slow down traffic, promote safe journeys to school and improve the local environment and safety for all road users.

2.4 A ‘7 day ‘traffic count, and speed survey’ on Ernle Road was carried out during the week beginning 1st March 2005. Based on the information gathered from the surveys, residents, requested that the speeds and volume of traffic within Ernle Road should be reduced. However in the absence of Personal Injury Accidents, the council was not in a position to justify bidding to Transport for London to obtain funding. Given the Council’s commitment to ‘20’s plenty’ the area is considered a priority particularly following requests through a resident petition details of which are given below.

2.5 In January 2008 the council was handed a petition signed by 32 residents of Ernle Road demanding that the council should introduce new traffic calming measures to prevent vehicles from speeding and using Ernle Road as a cut-through.

2.6 The council proposed a number of traffic calming measures within Ernle Road together with a proposal to reduce the legal speed limit to 20mph in the roads mentioned in section 2.1.

3.0 Background & Strategic Context

3.1 The proposals considered in this report are in accordance with the objectives of the Mayor’s Transport Strategy, which are reflected within the Council’s Local Implementation Plan (LIP).

3.2 Chapter 6 of the LIP contains the Council’s Road Safety Strategy which details initiatives to make borough roads safer for all road users.

3.3 There is evidence that by simply dropping the speed limit to 20mph crashes are far less likely to be fatal. At 20mph, only 10% of crashes are fatal compared to 50% at 30mph. According to studies in the UK and Denmark lowering the speed
3.4 The environmental effects on the local community if the proposed measures are implemented are listed below:

**Advantages**
- Improve the local environment and road safety for all road users - particularly vulnerable groups such as children
- Promote safe journeys to schools
- Reduce the number and severity of injuries to road users
- Reduce accident levels, especially for vulnerable road users
- Reduce 'rat running' (use of side streets to avoid main roads)
- Ensure fewer drivers break the speed limit

**Disadvantages**
- Increased perception of pollution however, research in Hull (where there are about 114 20mph zones) found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows.
- Traffic calming can result in delayed attendance times for emergency vehicles however in this instance there have been no objections to any of the physical measures from the ambulance services.

**Consultation**

3.5 Local Ward Councillors were contacted by e-mail on the 7th of October 2008 for any comments and suggestions in the process prior to the consultation exercise.

3.6 The formal consultation commenced on 23rd October 2008 for 3 weeks and closed on 14th November 2008.

3.7 A number of various options were considered for the area and after careful consideration, one was taken forward for a formal consultation. As a formal consultation is open to all for comments, where representations have been received within the consultation period, they are summarised in Section 5 and the appropriate council response put forward for this committee to consider. In
summary we received 32 objections in total, which is comparable to the number of signatories of the petition received in January 2008.

3.8 The councillors of the Village Ward area are generally in support of the proposed scheme and any other proposals, which make roads in this area safer for all.

4.0 Objections with Council Response

4.1 A number of representations were received during the consultation period. For the purpose of this section the objections received have been summarised and categorised into appropriate sections. Section 5.1 deals with the proposals which require a ‘Traffic Management Order’ or a Section 90 Notice under the Highways Act 1980 and so, would be the subject of the formal consultation process. If objections are considered ‘material’, they must be considered and upheld and the issues resolved satisfactorily.

Objection: Proposed Speed table outside 18 Ernle Road

Grounds of Objection:
The common grounds of objection received are related to the perceived noise and other environmental pollution, which is likely to occur as drivers decelerate and accelerate to negotiate the speed table. 18 objections were received to this proposed measure.

Some of the objections were also based on the aesthetics of the area.

One household in the immediate vicinity is also reported to be a regular ambulance user and is concerned that ambulances would have problems with the speed table.

Council Response
The speed table at this location is a key part of achieving the objectives of both lower speeds and reduced rat running. Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows. A carriageway narrowing at this point was also considered in earlier options but then disregarded, as it would not have been as effective in controlling speeds or deterring rat-running at this location.

The proposed speed table will not prevent ambulances or other emergency service vehicles from negotiating the speed table safely.
Objection: Proposed Change in Speed Limit

Grounds of Objection:
Two residents have objected to the proposed change in speed limit from the existing 30mph to the proposed 20 mph for Wool, Dunstall and McKay roads only. Objection is based on the belief that these roads do not have the problem, which Ernle Road has and should not be linked with the Ernle Road scheme.

Council Response
Experience from other similar schemes shows that roads treated in isolation often have the effect to shift traffic to adjacent roads where conditions are more favourable in achieving higher speeds. Though the other roads in the proposed speed limit area are not to have physical speed control measures the change in speed limit would help to some extent in deterring traffic diverting from Ernle Road to them.

Objection: Proposed Change in Speed Limit

Grounds of Objection:
A letter of objection was received from the Police. The Police have questioned the need for this scheme as they have not been given details of any vulnerability to road users in the area. They are also aware that there is no accident record for Ernle Road Area and so consider the changes as unnecessary.

Council Response
The council considers the objection from the police as immaterial. There is a considerable risk for road users in the area as has been identified by residents and confirmed by speed surveys carried out in 2005.

4.2 This section deals with objections relating to the parts of the scheme elements which do not require a Traffic Management Order*. The need to address the issues wherever possible is necessary where residents have commented.
<table>
<thead>
<tr>
<th>Issue</th>
<th>Number of Objections</th>
<th>Reason for Objection</th>
<th>Council Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Objections to Repeater signs</td>
<td>15</td>
<td>Use of / overuse of repeater signs</td>
<td>The number of repeater signs are necessary however the quantity will be reviewed and kept to a number which fulfils the requirements as required by regulations</td>
</tr>
<tr>
<td>Objection to Entry Treatments</td>
<td>2</td>
<td>May cause shunt type accidents on main road. Unnecessary features.</td>
<td>Drivers following another vehicle should do so at a safe distance. The features are necessary not only to slow vehicles entering Ernle Road but to also deter them from rat running</td>
</tr>
</tbody>
</table>
| Objection to Kerb Realignment at Junction of Wool and Ernle Roads | 1 | 1) The proposed kerb buildout at the junction would prohibit access to their existing driveway if implemented as shown in the proposals.  
2) New kerbline means a loss of on-street parking space outside the house.  
3) Proposed changes would prevent household from applying for an 'in-out' type of driveway in the future.  
4) The new grassed area outside their property would accumulate leaves, rubbish and dog mess. | 1) Council to ensure entrance/exit to driveway is not affected. Kerb alignment to be rechecked.  
2) On-street parking is not a right. Property already has a driveway. Parking should not occur near junctions.  
3) An 'in-out' driveway Not all properties can have this type of a privilege. The council works around existing road constraints and can only safeguard existing accesses not those that maybe proposed for the future.  
4) A sign to discourage owners of dogs from letting their fouling there will be erected if found to be a problem and requested by the resident. |
4.3 Section 5.3 deals with views expressed by those making representations to the scheme in which they have made suggestions to changing the existing scheme. Council Officers do not recommended that a change to the scheme proposals is justified or necessary for a number of reasons some of which are summarised as follows:

1) Extra scheme cost.
2) Safety reasons.
3) Setting a precedence for residents of other areas requesting similar treatment.
4) Which vary from the extra scheme cost.
5) Scheme delay as a result of further investigative and design work.
6) Additional maintenance work by council, which would be needed.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Number of Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roundabout at Junction of Ernle Road and Wool Road</td>
<td>7</td>
</tr>
<tr>
<td>Preference of a Road Narrowing in place of the Proposed Speed Table o/s 18 Ernle Road</td>
<td>8</td>
</tr>
<tr>
<td>A Right Turn Ban from Woodhayes Road into Ernle Road</td>
<td>1</td>
</tr>
<tr>
<td>A Left Turn Ban from Copse Hill into Ernle Road</td>
<td>2</td>
</tr>
<tr>
<td>A White Fencing at Both Ends of Ernle Road</td>
<td>6</td>
</tr>
</tbody>
</table>

5.0 Financial, Resource and Property Implications

5.1 This proposal can be funded from Merton capital allocations. The approximate scheme value is £65,000. If approved, to successfully deliver within this fiscal year will require good forward planning and project management and firm targets for phasing and achieving spend will be necessary.
6.0 Legal and Statutory Implications

6.1 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.

6.2 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.

6.3 Members must consider the factors set out in the results of the formal consultation set out in Appendix 3. While the views expressed by local residents must be considered, Members are not bound to decide in accordance with the majority view and must take the other legal relevant factors into account.

7.0 Equal Opportunities

7.1 The statutory consultation documents were distributed to all households/businesses within the agreed consultation area.

7.2 The statutory consultation documents included a section, offering translation into minority languages and affording any interested party the opportunity to make a representation regarding the scheme.

7.3 Statutory consultation is open to any interested party to make comments on the council’s proposals.

7.4 The proposals described in this report will be of benefit to all sections of the community.

8.0 Conclusion

8.1 The proposals are in line with the Mayors Transport Strategy and the Council’s commitment to 20’s plenty. In view of the responses received from the Statutory Consultation, the objections have been considered and appropriate comments by the design engineer made in Appendix 3 of this report.

USEFUL CONTACTS

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NOTES
1) FOR CLARITY, EXISTING ROAD MARKINGS (WHERE REQUIRED TO BE CHANGED) ARE NOT SHOWN IN THE DRAWING.
2) ROAD MARKINGS & LOCATION OF FEATURES ARE INDICATIVE AND MUST NOT BE RELIED ON FOR THE PURPOSES OF CONSTRUCTION.
3) FOR CLARITY, EXISTING SIGNS WITHIN THE AREA ARE NOT ALL SHOWN IN THE DRAWING.
4) REFLECTIVE SIGNS POSITIONS SHOWN FOR EXISTING ROAD ARE INDICATIVE IN THE DRAWING.
5) ACTUAL PLACING OF THESE SIGNS WILL BE DETERMINED ON SITE.
6) RAISED ENTRY TREATMENTS TO BE FINISHED IN BLACK TARMAC.
7) CONSERVATION KERBS OR KERBS MATCHING EXISTING WITHIN THE ROAD TO BE USED WHEREVER REQUIRED.
8) EXISTING WAITING AND LOADING RESTRICTIONS WITHIN AREA TO BE KEPT AS IS. THESE DETAILS ARE NOT SHOWN IN THIS DRAWING.
not necessarily the quantity. Your reasons are, therefore, important to us.

A copy of the draft TMO, a plan identifying the area affected by the proposal and the Council’s ‘Statement of Reasons’ can be inspected at Wimbledon Library and at Merton Civic Centre, London Road, Morden, Surrey during the Council’s working hours, Monday to Friday, between 9am and 5pm.

Please note that the outcome of the consultation, along with officers’ recommendations will be reported to the Cabinet Member for a decision. Once a decision is made, you would be informed accordingly via a newsletter.

CONTACT US
If you require further information, please contact Waheed Alam on 020 8545 3200 or email waheed.alam@merton.gov.uk. Alternatively you can visit our website using the following www.merton.gov.uk/Emnle20mph.

Village Ward Councillors
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Cllr Richard Chellew
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Cllr Samantha George
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If you would like more information in your own language, please contact us at the address shown in the bottom box.

These documents show information in easy to read format in order to assist a group of people who have difficulty of reading.

In accordance with the Disabled Discrimination Act 1995.

For text information can be provided in Braille and on tape, please contact Waheed Alam, Merton Civic Centre, London Road, Morden, SM4 5DX.

Appendix 2
Thank you for your Newsletter with the proposed 20 mph limit for the Ernle Road Area. Whilst the traffic situation in our road needs some redress, we do not want ramps or raised platforms so if they could be avoided that would be appreciated. Instead we would suggest the following solution.

We would prefer a mini-roundabout at the intersection of Wool Road and Ernle Road, preferably with a tree or shrubs. This would be very effective in slowing down traffic coming from Copse Hill (and probably also from Woodhayes Road) and there would be plenty of space to implement it. We understand that this solution has been raised before and would appreciate knowing the reason for its rejection, which was in our view a serious mistake.

The real problem with speeding occurs in the late afternoon from the eastern end of the road. A no-right turn from Woodhayes Road into Ernle Road (which is a dangerous movement at the best of times) could be a possible solution. An escape route via Dunstall Road would be narrow and longer than the Woodhayes route and not very practical, so an unlikely choice for motorists. A 20 mph speed limit may have some effect but experience suggests that it is often ignored.

Should a solution involving one or more chicanes or a small traffic island be feasible, we would welcome that as a very effective alternative measure.

**Officer Comments**

The proposed scheme has both the objective and potential for reducing speeds and reduce rat running. Speed tables and entry treatments are an effective means for achieving these objectives. Most of the proposals suggested as alternatives to the scheme consulted on were considered and investigated in earlier proposals but rejected for one or more of the following reasons:

1) Ineffective.
2) Initial cost / operational cost
3) Unpractical
4) Engineering difficulty
5) Safety reasons

I refer to the Newsletter dated 17/10/08.

Please consider this communication as a formal statement of objection to the introduction of a speed table outside 18 Ernle Road.

There are four principal reasons for my objection:

- On amenity grounds: the introduction of a speed table will generate significant additional noise and pollution, with drivers either braking when approaching, or accelerating when exiting, the speed table.

- On aesthetic grounds: the introduction of a speed table will spoil the vista of the Road, and is an entirely inappropriate construction in the West Wimbledon Conservation Area.

- On safety grounds: the introduction of a speed table will increase the accident risk. Vehicles accelerating when departing from the speed table are likely not to have sufficient regard for residents in adjacent properties attempting to enter, or exit, their off street parking.
• On consistency grounds: neither Alan Road nor Belvedere Grove - local streets very similar to Ernle Road has a mid-street speed table. The traffic calming measures in place there (kerb build outs and raised junction entries) are very effective, and should also suffice for Ernle Road.

As I genuinely hope is evident, I am very much against the introduction of a speed table outside 18 Ernle Road.

Please do not hesitate to contact me if you require any further comments.

**Officer Comments**

The speed table at this location is a key part of achieving the objectives of both lower speeds and reduced rat running thus in turn increasing road safety for all.

Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows.

A carriageway narrowing at this point was also considered in earlier options but then disregarded, as it was not considered as effective in controlling speeds or deterring rat running at this location.

A road narrowing at the location would require extra signing and bollards both of which would spoil the vista of the Road. However a speed table at low level is not considered to be as detrimental to the vista of the road as it will not be accompanied by extra signage at that location.

**22013291**

I support the proposal for a 20mph limit although I would prefer a legally enforceable 20mph zone. There is without question a requirement for speed control in this area because of the present high speed of traffic.

The limit/zone should not however be restricted to Ernle, Wool, McKay and Dunstall Roads. Vehicles are driven very fast along the whole length of Woodhayes Road from the Copse Hill roundabout to Wimbledon Common. There are times when the section from Ernle Road to the Common is like a racetrack and the parked cars do not inhibit the speeding. They are just an added danger, especially as there is a school on this section of road.

The limit/zone should therefore be extended to include at least the whole of Woodhayes Road and West Side Common to the junction with Cannizaro Road.

I also commend to the Council the actions being taken in Kingston where large areas, Comparable in size to the northwest Wimbledon area, are now 20mph zones. This has given a much more civilized feel to those parts of Kingston.

**Officer Comments**

Comments noted.

All speed limit schemes are designed such that they are legally enforceable however they are not necessarily classed as self-enforcing unless designed in accordance with the requirements and guidance of a 20mph Zone. The extension of the scheme to other roads would be for the council to consider in the future and not considered the subject of this consultation.
22013324
Thank you for your newsletter concerning the introduction of the 20MPH in Ernle Road. While supporting this limit we strongly object to the introduction of any speed tables within the road. We object to the aesthetic impact of such tables and the noise they induce.

Officer Comments
Comments noted.
Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows. The need for an effective traffic calming feature at the proposed location is necessary in order to control the existing high speeds. The proposed speed table at low level is not considered to be as detrimental to the vista of the road as other traffic calming features.

22013326
Further to the newsletter that we have received recently, I should like to register my response as follows:

20mph speed limit (approval)
I am in favour of the proposed 20mph limit on Ernle Road and the surrounding roads of McKay, Wool and Dunstall for reasons of road safety.

Traffic calming measures (objection)
I am opposed to proposed traffic calming measures such as a speed table outside no.18 Ernle Rd, and proposed speed bumps in the area. I believe these will affect this conservation adversely in terms of traffic noise (variable speeds over bumps) and appearance.

I am also opposed to the proposed raised junctions and kerb modifications which do not require formal consultation and would prefer to see if the signage has the desired effect on speed without going to the considerable expense of road modifications in the current economic climate.

Officer Comments
Comments noted.
Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows. The need for an effective traffic-calming feature at the proposed location is necessary in order to control the existing high speeds. The proposed speed table at low level is not considered to be as detrimental to the vista of the road as other traffic calming features.
The junction entry treatments are proposed to raise driver awareness that they are entering a special area with a lower speed limit. They also carry other benefits such as controlling speeds on entry to the area.
**22013386**

20MPH speed limit
we agree to the above speed limit.

**Traffic-calming measures**
We disagree to traffic calming measures.

**Officer Comments**
Comments noted.
Reasons to objection not provided.

**22013384**

In principle, I am in favour of the proposed 20MPH limit for Ernle Road, and I wish to thank Merton Council for attempting to stop Ernle from being used as a rat-run for speeding cars.

However, as things stand, my position is as follows:

- I am **against** the proposed raised platform outside 18 Ernle Road. Instead, I would strongly advise the council to amend its plans and implement the following measures instead:

  - A tree-planted chicane / island instead of the raised platform outside 18 Ernle Road to physically slow cars to 20MPH.

  - A tree-planted roundabout at the junction of Ernle and Wool Road. It is totally unacceptable to have no measures to prevent cars speeding on the bend of Ernle Road.

**White gates at both entrances to Ernle Road**. These would be cheap to implement and would provide a strong impression of a residential road and encourage drivers to slow down.

**In addition, the current plans for signage have the following shortfall:**

The signs stipulating ‘Traffic-calmed area. Residential access’ on Copse Hill and Woodhayes Road should not have arrows pointing towards Ernle Road. This might only encourage drivers to use our road when they see the arrow. These resident access signs, in general, would be better sited **underneath** the 20MPH signs at both entrances to Ernle Road, or on white gates at both entrances.

**Officer Comments**
No reason stated for objection to raised platform hence suitable response cannot be made.
The arrow in the special sign has been amended as suggested in the letter.
The measures suggested as an alternative scheme cannot be implemented for one or more of the reasons listed below:

1. Ineffective.
2. Initial cost / operational cost
3. Unpractical
4. Engineering difficulty
5. Safety reasons
This issue was an agenda item at the October AGM of North West Wimbledon Residents’ Association (NWWRA), the September Committee meeting, and a number of special meetings.

The Committee of NWWRA supports the Consultation to introduce a 20 mph limit (not zone) in the Ernle Road area (Dunstall, Ernle, McKay and Wool Roads). However, the Committee has some concerns and wishes to make the following points:

Although the platform outside 18 Ernle Road would undoubtedly slow vehicles when quiet conditions allow them to speed, the platform (even with the mild gradient of 1 in 15) will cause deceleration, acceleration and therefore noise and pollution, and to the residents near that location distress and irritation which they have not suffered previously. They are thus the people who have to suffer for the benefit of the rest. NWWRA Committee suggests that the platform outside 18 Ernle Road is not yet put in-out instead there-is a pause while it is seen if the rest of the measures achieve the desired effect. This may be tested by a speed and volume survey for a week some months after the introduction of the other measures.

If it is then found that there is still significant speeding, the raised platform should be installed.

The Committee suggests that fewer "20" repeater signs are used than the 17 which are shown on the map. They, together with the "Humps for... yards" signs, will be quite intrusive and cumulatively destructive of the peaceful effect of a Conservation Area. (It is peace you are trying to achieve, of course.)

The Committee believes that at the right time the 20 mph limit should be extended to incorporate Woodhayes Road, which does have an accident record with speed as a recognised factor.

Thank you for your work on this issue.

**Officer Comments**

Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows. The need for an effective traffic-calming feature at the proposed location is necessary in order to control the existing high speeds. The introduction of speed table or other features within the scheme cannot be done in piecemeal. The funding made available for this scheme needs to be utilised within this financial year or else it is lost.

The use of the number of repeater signs will be reviewed so that the minimum number required by regulations is used.

The council may consider the extension of the 20mph limit to other roads in the future.

**22013410**

I am writing to support the introduction of a 20 mph limit in Ernle Road and surrounding roads. This would help to reduce the excessive amount of traffic using these roads for a short cut, and it should help reduce the dangers to pedestrians of the traffic that remains. I would not favour raised humps or speed tables in the middle of the road because of the deceleration and acceleration these tend to create. Rather, I believe that the desired impact could be achieved by the proposed kerb build outs at Wool / Ernle Roads and
Dunstall / Woodhayes Roads, together with a raised junction at Ernle Road / Copse Hill and Ernle Road / Woodhayes Road.

I would also favour a simple white fence at both ends of Ernle Road which would indicate that this is a quiet residential area and which might help deter drivers turning into the road to use it as a short-cut.

I would prefer a reduction in the number of signs saying 20 and 30 than the number proposed. We have enough street clutter already and a sign at both ends of the road together, if necessary, with one in the middle would seem to me to be quite enough to alert drivers who will already be aware, having driven over a raised platform, that they are in a traffic-calming area.

Finally, if a speed calming measure is really required in the middle of Ernle Road, I would suggest that a chicane along the lines of those in Copse Hill would be less disruptive to local people than another raised platform.

**Officer Comments**

Comments noted.

Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows. The need for an effective traffic calming feature at the proposed location is necessary in order to control the high speeds. Other forms of traffic calming would not be as effective as a speed table.

The use of the number of repeater signs will be reviewed so that the minimum number required by regulations is used.

The measures suggested as an alternative scheme cannot be implemented for one or more of the reasons listed below:

1. Ineffective.
2. Initial cost / operational cost
3. Unpractical
4. Engineering difficulty
5. Safety reasons

22013409

We refer to your newsletter of the 17th October in respect of the proposed 20MPH limit in Ernle Road.

First and foremostly, we are totally supportive of the action that clearly needs to be taken to reduce the volume and speed of traffic. It has become clearly a "rat run".

We do think that the proposed measures can be enhanced and improved upon. One feature that has been discussed before with Councillors and Planning would be for the implementation of white fencing gates at both ends of Ernle Road. Not only would the gates provide a strong visual signal of a residential and conservation area, but we are sure they would also act as a deterrent to speeding traffic.

The council has intimated that the cost and maintenance might be an issue, however we have met the residents and we have also been part of the Ernle Road steering group and can confirm that there are residents in the road who would gladly meet this cost out of their own pocket if required. They can also easily be designed in such a manner that there is no hindrance to drivers from a visual and safety point of view.
A further enhancement would be a roundabout at the Wool Road Junction. This would help to reduce the speed as there appears to be no enforcement in the proposals which is clearly an issue for concern.

With respect to the specific proposals, we think the Middle Platform is not necessary and would create further noise pollution and be unsightly in a conservation area. A planted chicane would be a more acceptable and practical solution. We look forward to hearing further news on the above.

Officer Comments

Comments noted.
The measures suggested as an alternative scheme cannot be implemented for one or more of the reasons listed below:
  1. Ineffective.
  2. Initial cost / operational cost
  3. Unpractical
  4. Engineering difficulty
  5. Safety reasons

Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows. The need for an effective traffic calming feature at the proposed location is necessary in order to control the high speeds. Other forms of traffic calming would not be as effective as a speed table.

22013411

I would like to express my support on the majority of items on the above proposal. However I would suggest that the speed restriction signs should not be overused.

I strongly support the proposal to introduce white fencing at both ends of Ernle Road, which would act as a strong visual signal of a residential area.

It has been suggested that a roundabout at the junction of Wool Road & Ernle Road would slow traffic, I feel this would be an unsightly intrusion in a residential street, and create additional road noise so would not support this.

Perhaps an alternative would be an additional built-out grassed kerb on the opposite side to Wool road. This could prevent uninterrupted speed through that junction and believe have the desired effect.

Officer Comments

Comments noted.
The use of the number of repeater signs will be reviewed so that the minimum number required by regulations is used.
The measures suggested as an alternative scheme cannot be implemented for one or more of the reasons listed below:
  1. Ineffective.
  2. Initial cost / operational cost
  3. Unpractical
  4. Engineering difficulty
  5. Safety reasons.
I strongly oppose the 20mph limit scheme for Dunstall, McKay and Wool Roads.

1. There is virtually no traffic in Wool Road, McKay Road and Dunstall Road, so it is an unnecessary infringement for these three roads to be included with Ernle Road.

2. We have a beautiful conservation area. The presence of 24 20 mph limit signs along the sides of these roads would totally alter the rural nature of this area.

3. The cost of putting up 24 speed signs is a waste of tax payers' money.

4. It would not be enforceable and so is an unnecessary eyesore.

5. Changing speed zones creates an extra burden on the driver when they have to take their eye off the road to check their speed as well as to keep looking out or signs to see when they can return to normal speed and the confusion that arises if you've missed it.

6. Ernle road is a short cut mainly in term time rush hour when there is queuing to the roundabouts at Copse Hill. The presence of so many parked cars in Ernle Road is in itself a deterrent. At other times of the day and year it is very quiet.

7. I can appreciate that humps may act as a deterrent if they want them, I suggest the one at the Copse Hill Ernle Road junction not be right at the entrance. It is a tight corner to manoeuvre and then the bend in the road with traffic coming the other way. It would be better further in when one starts to accelerate.

Should the bumps be installed in Ernle Road, I do not think cars will divert down Wool Road as it is a longer diversion and in any case for 10 minutes during the morning school rush hour is not a reason for a limit during the rest of the year.

Can I conclude that Dunstall, McKay and Wool Roads do not have a safety issue; in fact we hardly have any traffic at all so I strongly object to having these unnecessary speed limits imposed on us.

The Proposals

A. A speed table outside no.18 Ernle Road

I know the immediate local residents do not want it. I support and respect their wishes. Humps produce uncomfortable rides for the elderly, small children and pregnant mums as well as increased noise, pollution and bunching of traffic in a residential area. Houses shake visibly when dumper trucks go over them. I appreciate humps may slow speed but they also consequently encourage cars to race in between.

1. A kerb build out at Wool Road / Ernle Road junction

I agree with the kerb build out here provided the immediate houses have access. It would make it easier for pedestrians to cross the road and slow any traffic wanting to go down Wool Road and also along Ernle Road as it would be a tighter corner.

2. A kerb build out at Dunstall / Woodhayes Road junction.

This would help pedestrians crossing the road.

3. A raised junction entry treatment at Ernle Road / Copse Hill junction.

I disagree with a raised junction here as it would be dangerous. Coming up from Copse Hill is a tight right hand manoeuvre, one has to slow down considerably to turn in and then adjust to the bend in the road and the possible oncoming traffic. To introduce a build out here would make it more difficult and would result, in someone hitting you from behind. Also entry from Cottenham Drive across Copse Hill would be made more
difficult: If a build out has to be built, may I suggest further round where cars start to accelerate after the corner.

4. A raised junction entry treatment at Ernle /Woodhayes Road junction.
I would support this if the immediate residents want it. We live in a quiet beautiful Conservation Area. We are all aware that at certain times of the day traffic may be busy in Ernle Road and we make allowances for it, but do not agree with a 20mph limit for the whole area nor raised entry junctions. I have lived here for 27 years and have not been aware of any accidents

**Officer Comments**
Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows. The need for an effective traffic calming feature at the proposed location is necessary in order to control the high speeds. Other forms of traffic calming would not be as effective as a speed table.
The use of the number of repeater signs will be reviewed so that the minimum number required by regulations is used.
Though Wool, Dunstall and McKay roads may not have a problem at the time, experience from similar schemes shows that local roads near to a newly traffic calmed area can be affected by diverting traffic at a later date.
The scheme is designed to be enforceable but may not be classed as self-enforcing.

**22013452**
I write with regard to the consultation on the above proposal.
I have read the letter written by my Wife, (XYZ), and fully support all she says. I strongly oppose the introduction of any 20 mph speed restriction in Wool Road/McKay Road/ Dunstall Road.
If I may add three further observations

1. The West Wimbledon [Wool Road] Conservation Area is one of [if not THE ] most outstanding examples of a Conservation area in the whole of Greater London : it is completely unspoilt by later development, by street signage, by parking lines, and remains a beacon of tranquillity for both residents and walkers. It is right that it should remain so. There IS no general traffic problem. Hardly a car ever comes up or down Wool Road before 7 am, except the paper boy [newspaper delivery]. You can stand there for half an hour in the middle of the day, and not see a car. There is no justification for these proposals, or the cost involved.

2. The motivation for these proposals has been stirred by two alleged “incidents”. One of these, apparently, involved a parked motorist opening a roadside car door, and the door being destroyed by a passing car. This would have happened at 5 mph, 20mph or 30mph. A momentary lapse by one unthinking resident [or visitor] is hardly a good reason to initiate blanket proposals that do not have majority, let alone, near universal support.

**Officer Comments**
Though Wool, Dunstall and McKay roads may not have a problem at the time, experience from similar schemes shows that local roads near to a newly traffic calmed area can be affected by diverting traffic at a later date.
We wish to object to the proposals as currently formulated for the reasons given below.

1. Inadequate reasons stated
The only reason given in the “Statement of Reasons” is: “The main purpose of the scheme is to improve road safety for vulnerable road users by reducing vehicle speeds”.

This could apply to any road, anywhere. In particular:

1. There is no objective evidence given that vehicle speeds are too high
2. There is no objective evidence given that traffic levels present a risk.

There may be good reasons for a 20 mph zone, but these have not been established or disclosed.

2. Entry to Dunstall Road from Woodhayes Road
The tightening of the entry to Dunstall Road will inconvenience residents only; vehicles travelling along Ernle Road will not typically need to turn in to Dunstall Road unless that is their destination.

3. Speed limit signs
The plan included in the newsletter contains 22, new 20 mph speed limit signs. These signs will be unsightly especially in a Conservation Area where the street scene is largely unchanged from the 1930s and the number seems excessive for a set of roads with so few access points. Surely one sign at the top of the roads would be sufficient.

4. Alternative measures
We wonder whether road safety be improved adequately simply by installing one or more pedestrian crossings on Ernle Road, especially at the end where traffic merges onto Woodhayes Road and presumably at much lower cost than the full range of initiatives proposed.

Officer Comments
Comments noted.
Tightening of kerbline will help to slow vehicle speeds. The use of the number of repeater signs will be reviewed so that the minimum number required by regulations is used. Alternative measures such as those contained in the letter is out of the scope of this consultation.

We would like to register our opposition to the proposed Traffic Management Order in the Ernle Road area.

We oppose the proposal of a 20mph zone in Ernle Road. We would give some degree of support to a 20mph limit. We are not convinced of the benefit of a 20mph limit localised to the Ernle Road area rather than one applied and enforced throughout the borough.

We do not support the differential proposal of 20mph zone to Ernle Road compared to the adjacent roads for which a 20mph limit is proposed.

We do not believe that either of such measures will have significant effect upon the
maximum speed attained on the roads by those vehicles which flout the current 30mph limit. They will not, therefore, result in the expected accident savings or any improvement to the environment. Such measures will not improve the local amenities; they will not reduce public anxiety nor improve facilities for vulnerable road users. They may add to delays to traffic at the peak times when speed is not an issue. We believe that the cost of implementation, engineering measures and their maintenance is not justifiable in the face of this.

We believe that there would be significant costs of enforcement, since the 20mph speed limit is likely to be regarded as unreasonable by drivers. At a recent residents' association meeting no commitment to enforce a new 20mph limit or zone was given by the safer neighbourhood police officer, rather it was regarded as 'self-policing'. This is recognised to be unsatisfactory in areas where drivers believe the limit to be unreasonable.

We believe it would be cost effective to enforce the current 30mph speed limit before any additional measures are considered. There would be a significant deterrent effect in terms of both speed and volume of traffic if enforcement were undertaken by the use of a portable radar speed device at critical times.

Specific concerns are raised by the proposal of a raised speed table outside No 18 Ernle Road. This proposal is inappropriate. Such a platform will have a deleterious effect upon the environment for the following reasons:

a) Causing increased noise due to braking and acceleration.
b) Causing increased CO2 emissions from the inevitable effect upon fuel consumption.
c) Causing significant visual impact upon the street scene of an established conservation area.

The speed table would result in a detrimental effect upon the conservation area. Residents, owners and the local authority all have an important role to play in preserving the character of the conservation areas. These alterations may be small in scale, but they would be prominent and have a large impact on the area that for the most part has a cohesive character. Great appreciation of the distinctive visual qualities of this conservation area is taken by all owners and residents. The local authority should do the same.

The particular characteristics that merit this area's designation as a conservation area derive from the early 20th Century architecture and diverse styling of the large 'ornate' detached houses, the uniform street design including grass verges, and natural landscaping of the surrounding area and views. The effect that a speed table would cause upon the street scene is directly contrary to these features.

The roadway and front gardens are important in contributing to the character of the area, as together with the mature trees that line the roads they create an important softening of the street scene. The proposal of multiple 12inch 20mph signs would have further deleterious impact upon this.

We believe that more sensitive alterations would help preserve the character of the area and may be equally effective. Less costly measures should be used first before the proposed insensitive measures are considered. Designing a scheme which will be acceptable to all those who live in the area and improve their environment as well as improve road safety should be the paramount requirement of any intervention.
In making these comments we have made reference to the newsletter we received recently dated 17th October 2000(sic). We were unable to find any information on the council's website as the listed address (www.merton.gov.uk/Emle20mph) did not lead to any page.

In summary, we are opposed to the proposal of a 20mph zone in Ernle Road but give some degree of support to a 20mph limit. We believe it would appropriate to enforce the current 30mph speed limit before any additional measures are considered.

**Officer Comments**

The scheme proposed is a 20mph limit not a zone. Ernle Road is to have the same 20mph limit as the adjacent roads.

Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows.

The 20mph speed limit will be the legal speed limit and fully enforceable. It will not necessarily be self-enforcing. Self-enforcing schemes which have the necessary traffic calming measures which force drivers to drive at a slower speed. Generally ‘20mph zones’ are classed as self-enforcing schemes.

The road signs are a legal requirement for the speed limit to be enforceable. However every attempt shall be made to reduce the number of repeater signs to the absolute minimum whilst keeping in line with regulation requirements.

**22013425**

We write to support the proposed introduction of traffic calming measures in the Wool Road Conservation Area. Our observations on the proposals are listed below:

1. We agree that the 20 mph limit should help to deter the speeding of cars through Ernle Road
2. We strongly support the introduction of raised entry platforms at the proposed sites (Copse Hill/Ernle Road, Woodhayes Road/Ernle Road, Woodhayes Road/Dunstall Road)
3. As residents living close to the proposed raised platform we are not in favour of this. We have serious concerns regarding the potential increased levels of noise & pollution.
4. The proposed footway widening to the entrance of Dunstall Road would improve pedestrian safety.

We would like to take the opportunity to express the following additional points:

1. The 20 mph should be enforceable. We cannot understand why this is not the proposal.
2. Has there been any consideration of a ‘half way’ compromise to the ‘no left turn’ proposal by the Ernle Road Steering Group? In other boroughs with similar ‘rat run’ problems down residential roads (made worse by the school run) could a no left turn between the hours of 7.30 – 9.00 have been proposed? For example a clear precedent has been set in nearby boroughs such as Putney.
**Officer Comments**

Comments noted.
Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows.

The 20mph speed limit will be the legal speed limit and fully enforceable. It will not necessarily be self –enforcing. Self enforcing schemes which have the necessary traffic calming measures which force drivers to drive at a slower speed. Generally '20mph zones' are classed as self-enforcing schemes. A part time 'No left turn ' is likely to be flouted as physical changes to prevent the turn in would not be possible.

**22013408**

While welcoming the proposed 20MPH limit for Ernle Road, I am writing to object to the introduction of a speed table outside 18 Ernle Road for the following reasons:

1) **Ineffective** - One speed table at this location will not be sufficient to enforce lower speeds across Ernle Road as a whole.

2) **Noise** - I believe the table will create a lot of unpleasant noise for those living near it.

2) **Looks** - I do not think a speed table is visually appropriate for a Conservation Area.

I would suggest instead that we need speed enforcing measures that are:

**A) Effective for the length of the road.**
**B) Visually consistent with a Conservation Area.**

I would propose the following combination of measures in place of the speed table:

i) **Planted Roundabout** (see Fig 1) at the junction of Ernle Road and Wool Road. This would slow down cars coming round the bend from Copse Hill which is where most of the acceleration takes place. The low planting would make it suitable for a Conservation area.

ii) **Planted Chicane** (see Fig 2) outside 18 Ernle Road. This will provide a much stronger enforcement of the 20MPH limit and provide a more visually appropriate measure than the speed table.

iii) **White Fencing** (see Fig 3) at both entrances will provide a strong signal of the road’s residential and Conservation nature and act as an additional deterrent to cars entering the road.

This fencing is used very successfully on half a dozen residential roads between Ernle Road and Kingston. I do not agree that they obstruct driver vision dangerously as Merton has suggested in the past, nor are they particularly maintenance intensive given that Merton already mows the grass at one entrance of Ernle Road. Please note that I and other Ernle Road residents are happy to enter into a covenant to maintain the fences if required.
Other comments on the 20MPH proposal:

Residential Access Signs
These are potentially useful deterrent signs but I suggest making the following enhancements:
- Placing them under the 20MPH signs at the entrance of the road without the arrows (which seem to encourage rather than discourage traffic flow).
- Swapping round the wording to read, ‘Residential Access. Traffic-calmed Area’.

Summary
It is within Merton’s grasp to effectively solve the dangerous rat run that is Ernle Road. Over 11,000 cars a week use Ernle Road and over 80% of them are exceeding 20MPH (source: Merton’s 2005 figures).

However a 20MPH limit and one speed table will add a lot of signage and noise for little appreciable reduction in speed along the road as a whole. This is hardly a good use of Merton’s budget. A failure to solve the speed and volume problem now is likely to meet with very strong protest from residents.

By implementing the planted roundabout, planted chicane and white fences in place of the speed table, Merton will have dealt effectively with the problem once and for all. I do hope you seize this opportunity.

Officer Comments
Comments noted.
The measures suggested as an alternative scheme cannot be implemented for one or more of the reasons listed below:

1. Ineffective.
2. Initial cost / operational cost
3. Unpractical
4. Engineering difficulty
5. Safety reasons

Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows. The need for an effective traffic calming feature at the proposed location is necessary in order to control the high speeds. Other forms of traffic calming would not be as effective as a speed table.
Modification to the special sign face will be made in accordance to the contents of this letter.

22013328
I am writing in approval of a 20 MPH limit on Ernle Road and the surrounding roads of McKay, Wool and Dunstall for reasons of road safety. I am also writing to object to the construction of any speed platforms, curb build outs or any traffic-calming measures. Try the 20 MPH speed limit only first. The roads will be safer; the Council will save money.

My reasons are as follows:
1. 20 MPH speed limit (Approval)
a. The introduction of a 20 MPH speed limit is demonstrated to reduce traffic accidents by 60% and child pedestrian and cycling accidents by 67%.
b. More importantly, 1 in 40 pedestrian fatalities occur at 20 MPH whilst 2 out of 10 pedestrians die at 30 MPH. A 20 MPH speed limit saves lives.
c. A reduction in vehicular speed alone will make the street much safer. Please refer to attached BMJ and Evening Standard articles.

2. Traffic-calming measures (Objection)
   a. Traffic calming measures are unsightly and blight an area leading to reduced house prices. Given we are in a property slump, I would have thought the Council should be trying to preserve property values and not destroy them. I would not buy a house within a traffic-calmed area and now I may be forced to live in one thrust upon me! Unacceptable.
   b. Traffic-calming measures slow cars which then accelerate to the next one. The increase in engine noise and the noise of the wheels striking platforms will destroy the residential nature of Ernle Road.
   c. Acceleration away from traffic-calming measures will increase CO2 emissions, destroy the environment and warm the planet.

When I moved to Ernle Road in 1985, I found the rush-hour traffic to be incredibly congested. Returning to Ernle Road in 2007 after working in Aberdeen for 13 years, I found congestion to be much less and was pleased. However driver aggression remains, even between near-stationary cars facing each other and fighting to be the first through a constricted space. I doubt whether 20 MPH speed limits or traffic-calming measures will have much affect on these people. However the introduction of a 20 MPH on our four roads just might encourage them to stay on Copse Hill because Ernle Road will appear to be less of a speedster's rat run

**Officer Comments**

Comments noted.
Residents of Ernle Road have on many occasions reported the speeding of vehicles in their road. The high speeds were also recorded in traffic surveys carried out in the past. A change in speed limit without accompanying traffic calming measures is only likely to be partially effective in places where precedence for high speeds has been set in the past.

22013429

In response to your proposal regarding the above traffic calming measures, we would like to raise the following points:

1. **A kerb build out at Wool Road/Ernle Road junction** -- we oppose the proposed build out for several reasons: (a) this prohibits access to our driveway as currently drawn on your plan; (b) we would lose the space outside our property for parking (for ourselves and/or visitors); (c) we would lose the option of applying for an in-out driveway; (d) we oppose the size of the grassed area as drawn on your plan outside our property as this would encourage accumulation of leaves, rubbish and dog mess.

We are in agreement that the traffic needs to be slowed down coming round that bend in particular.
We would ask you to consider an alternative design, shape and size if this build out is necessary and should be grateful for consultation on this particular measure together with the consideration of our neighbours at 38 Ernle Road whose driveway entry is right on this bend.

2. A raised junction entry treatment at Ernle Road/Copse Hill junction -- this may increase the chance of an accident as a car slows down to enter, the car behind continuing along Copse Hill may be too close behind and bump it. The raised entry would also have the potential to damage the bumper of a car trying to enter at an awkward angle.

3. A raised junction entry treatment at Ernle Road/Woodhayes Road -- we oppose this proposal for the same reasons in paragraph 2 above. In addition, this is a very busy junction and in my observation of walking past once or twice a day, by restricting the entry with a raised entry, I am sure there will be accidents.

4. A consideration instead of the raised entry treatment for the two junctions mentioned above in paragraphs 2 and 3 -- should we concentrate on slowing down the traffic on Copse Hill and Woodhayes Road before they reach these junctions?

May I propose the erection of more 30mph speed restriction signs plus the digital speed monitor currently situated on the Ridgway between The Downs and Edge Hill. Possible locations would be Woodhayes Road near Peregrine Way and Woodhayes Road near the tennis club approaching Ernle/Woodhayes junction and two more on Copse Hill approaching the other junction.

I frequently walk along Ernle Road to Woodhayes Road and also cross Copse Hill into Cottenham Drive. Most days, I am alarmed at the speed of traffic coming along Woodhayes both from the direction of King’s College School and also from the other direction of the mini roundabout; and also coming along Copse Hill.

5. We consider the erection of some 20 road signs 12 inches in diameter to be visually intrusive in what is now a beautiful, green and peaceful residential area in the Wool Road Conservation area.

We do support part of your proposal, namely the back to back speed signs at the entrance to both ends of Ernle Road and the top of Dunstall Road and as suggested above in paragraph 4, more speed restriction signs in Woodhayes Road and Copse Hill. We are in agreement that some sort of measures should be taken to slow down the speed of traffic on Wool Road downhill, Ernle Road and Dunstall Road. May we suggest, a few road humps, certainly at the top of Wool Road and at regular intervals along Ernle, Dunstall and Mackay Roads? This seems to be effective in other roads in adjacent areas.

We have lived in the area for fifteen years and raised two children who are now in their teens. We understand and sympathies with those families now living in the area with young children and realise the potential danger to them from the volume of traffic at certain times of the day. However, this traffic is concentrated during term time (especially in the morning). By being sensible and vigilant, certain risks can be somewhat reduced.
It seems a pity that the peaceful and attractive surroundings we live in may be encroached upon by the erection of 20 large reflectorised signs, concrete kerbline build outs, a significant speed table in Ernle Road and raised entry platforms.

**Officer Comments**

The kerb build out at Ernle Road/Wool Road junction will be reviewed to ensure that no access problems for vehicles entering or leaving the property would be encountered. The property at this location has off-street parking. The residents will be contacted to ensure the final buildout is not problematic.

The road signs are a legal requirement for the speed limit to be enforceable. However every attempt shall be made to reduce the number of repeater signs to the absolute minimum whilst keeping in line with regulation requirements.

**22013430**

We are writing in reference to the proposed traffic calming features for the Ernle Road Area in support of part of the proposal and to oppose part of the proposal.

We wish to support the speed bumps at the entrances into Ernle Road from Copse Hill and Woodhayes Road, and the extension of the kerbline at the junctions of Wool Road / Ernle Road, and Dunstall Road / Woodhayes Road. We think these measures will help with the speed and safety in these areas.

We also feel that the road hump at the junction of Ernle Road and Copse Hill would be better set slightly further into Ernle Road as it is more likely to be a speed deterrent if the driver negotiates it a couple of seconds after turning into Ernle Road. If the hump is right at the junction it will make the junction more difficult to enter and exit Ernle Road.

We do not agree with the road signs. The problems with the traffic in Wool Road is only during the morning rush hour, during school term time, and does not happen every day. It is dependent on whether there are queues forming in Ernle Road. The road signs are unsightly and unnecessary, and we don't believe they will in any way affect the speed of the local drivers who are using these roads as a short cut.

**Officer Comments**

Comments noted.

The road signs are a legal requirement for the speed limit to be enforceable. However every attempt shall be made to reduce the number of repeater signs to the absolute minimum whilst keeping in line with regulation requirements.

**22013435**

With reference to your circular of 17/10/08, ref. No. as above I would like to register my approval for

- 20mph limit
- build out and raised junction entries.

I would like to register my objection to the huge number of 20mph signs – There are over 20 in just a few streets. One at the end of each street is all that should be
necessary given the buildouts / bumps. The reason is you would be defacing a conservation area.

**Officer Comments**

Comments noted.

The road signs are a legal requirement for the speed limit to be enforceable. However every attempt shall be made to reduce the number of repeater signs to the absolute minimum whilst keeping in line with regulation requirements.

**22013437**

We write to you in support of proposed speed reductions on Ernle Road and surrounding roads. We give below (NOTE 1) our personal observations and experiences as grounds on which we believe speed reduction is essential.

However, there are certain details of the proposal that we are both in favour of and against. These are given below.

**We are IN FAVOUR OF the 2 raised entry platforms at either end of Ernle Road with the addition of white fencing at both ends of the road.**

Given our observations (please see NOTE 1) we believe that the key to reducing traffic speed is to force the deceleration of traffic at the left turn from Copse Hill in to Ernle Road. There needs to be greater incentive for drivers to think twice about entering Ernle Road at all. As an addition we would therefore welcome white fencing at both ends of Ernle Road (similar to the ones used on the Coombe Estate) to send a clear message to drivers that Ernle Road is not a cut through.

**We are AGAINST the implementation of a mid-way platform but would welcome a planted chicane as an alternative.**

The single mid-way speed table, whilst forcing drivers to slow temporarily, will result in a subsequent acceleration, resulting in increased noise and pollution. We do not believe it is fair on the residents at this location to suffer the main impact of this increased noise and pollution. As an alternative, we would welcome a planted chicane which would force a more continuous reduction in speed, thereby reducing noise and pollution, and which being within a Conservation Area, would be more aesthetically pleasing.

**We are AGAINST the 20 MPH signs along Ernle Road.**

The diagram on the proposal contains 5 20MPH speed limit signs. We feel this is inappropriate to a Conservation Area and will be aesthetically unsatisfactory. We believe that the implementation of raised entry platforms and white fencing at either end of the road plus a chicane at the mid-way point, should be sufficient to reduce the speed of the traffic deeming these signs unnecessary.

**Officer Comments**

Comments noted.

The measures suggested as an alternative scheme cannot be implemented for one or more of the reasons listed below:

1. Ineffective.
2. Initial cost / operational cost
3. Unpractical
4. Engineering difficulty
5. Safety reasons

Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows. The need for an effective traffic-calming feature at the proposed location is necessary in order to control the high speeds. Other forms of traffic calming would not be as effective as a speed table.

The road signs are a legal requirement for the speed limit to be enforceable. However, every attempt shall be made to reduce the number of repeater signs to the absolute minimum whilst keeping in line with regulation requirements.

22013440

I am happy to accept a 20mph speed limit on the above roads, but do not think it particularly necessary. However, I do object to having so many signs informing me of that limit. 24 signs in such a small area is ridiculous, and a great waste of council’s precious funds. They will be a blight/nuisance on the roads. This is a residential area, not a city center.

I hope to find far fewer signs in place than the number proposed. Frankly it is a waste of ratepayers money.

**Officer Comments**

Comments noted.

The road signs are a legal requirement for the speed limit to be enforceable. However every attempt shall be made to reduce the number of repeater signs to the absolute minimum whilst keeping in line with regulation requirements.

22013456

We are writing in response to your notice dated 23 October 2008 outlining your proposal for the 'Establishment of a Speed Table' in front of 18 Ernle Road.

We understand that Ward councillors and the Cabinet Member have had discussions with a few residents of Ernle Road that have purported to represent the consensus viewpoint of all residents in the road regarding the speed at which cars travel down Ernle Road. First of all we would like to inform you that the 'Ernle Road Steering Group' does not speak for the vast majority of residents. It was a 'self-appointed' group set up without the consent or agreement of all residents in Ernle Road. It is not a 'Resident's Association' as you referred to in your consultation document. We have spoken to many residents over the past couple of weeks who feel aggrieved that this perception has been created. Whilst there is general agreement that a speed restriction is a good idea most residents have not been consulted on the means to implement this policy.

We **strongly oppose** the introduction of a 20mph Zone and therefore oppose the introduction of traffic calming measures that would be implemented to enforce the zone. In particular, we strongly object to the erection of a Speed Table directly outside no. 18 Ernle Road. We believe that introducing a 20mph limit as opposed
to a zone would be a better solution to the speeding cars in Ernle Road. The reasons for our objections to the Speed Table are as follows:

- Increased noise pollution as vehicles decelerate onto and accelerate off the Speed Table.
- Increased air pollution and carbon emissions due to excessive braking as vehicles approach the Speed Table.
- The Speed Table could cause subsidence to the adjacent property (no.18) due to excessive amounts of vibration.
- Constantly having to transverse the Speed Table would worsen the symptoms of (Mrs. XYZ's) medical condition (xyz condition) making her life more uncomfortable and painful.
- The Speed Table would be a major problem for emergency vehicles such as ambulances thus causing delays. This is of particular concern given our son is diabetic and will need an urgent ambulance if he goes into a diabetic coma. It would also cause access problems for any attending ambulance. Speed Tables frequently cause damage to vehicles, even at low speeds. There is a high chance that the underside of our car will be damaged if we are having to constantly transverse the Speed Table even to reverse our car into our driveway.
- Increased danger in particular to children (of which there are many in the road) as drivers tend to swerve to avoid road humps.
- Loss of on-street parking for residents living at no.18 and 9.
- The Speed Table would cause a danger for road crossing for young children as they might believe it to be part of the footpath.
- The environs are in a conservation area and such measures are not in keeping with that condition.
- Many of the driveways are opposite each other and road changes of the style suggested would create real problems moving cars out of properties safely. The potential for accidents would increase dramatically.

As we live at no.(xxx), the proposed location of the speed table, all of these concerns will significantly impact on us and our family (and no. xxx opposite) more than any other resident in the road. We believe that this is unjust, unfair and discriminatory.

I understand no final decision has been taken on road calming measures. If this is indeed the case as I trust it is I would urge a reconsideration of the proposals and wider consultation before any action is taken.

**Officer Comments**

Comments noted.

Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows. The need for an effective traffic-calming feature at the proposed location is necessary in order to control the high speeds. Other forms of traffic calming would not be as effective as a speed table. There is no evidence to suggest that speed tables cause excessive ground borne vibrations enough to be detrimental to properties, provided that they have good foundations. No loss of on street parking is
resulting from the installation of the speed table. There is no evidence to say that ambulances or other vehicles would be affected with a table of the height as proposed. Speed tables and humps are an accepted form of traffic calming and drivers have to negotiate such forms of traffic calming all over London. Speed tables negotiated at the right speed should not interfere with ones health problems either.

22013467

I am in receipt of your newsletter entitled Proposed 20mph limit in Ernle Road Area and dated 17 October 2000 (sic) I have read and re-read it numerous times and am completely confused by its lack of clarity. In Paragraph 2 of the Newsletter entitled "Proposals" - a word described in the Oxford English dictionary as "ideas put forward for consideration", - you refer as follows ". . . . . it has been agreed to consider the introduction of a 20mph limit... ...". The word "consider" means "to discuss". The Newsletter continues "However, it has been agreed to consider and formally consult on the introduction of a speed table outside No 18 Ernle Road", and then continues, "it has also been agreed to introduce.. . . . . a range of measures for which we are then told do not require any consultation at all. How can this be so when each and everyone point comes under the heading "Proposals" ie. open for discussion and consideration.

I would like to know how measures referred to as "Proposals" can have been agreed without any discussion with all the residents or at least an opportunity for them to be commented on at the proposal stage - ie.now.

I feel therefore aggrieved that for reasons that are unexplained I am only permitted to comment on one point in the list of "proposals" all of which will have an impact on daily life in Ernle Road, and all of which will detract from the ambience of this delightful road in the heart of a conservation area.

Of course I do not want a speed platform in the centre section of the road; nor do I want the ones "already agreed" at either end of the road; nor do I want the plethora of street furniture -more than 20 signs showing the speed limit as 20mph, and others giving warning to the motorist of what lies ahead. Incidentally no indication is given as to the size of any signs, whether they are to be fixed to existing lampposts or whether new posts will have to be dug into the pavements to accommodate them. Whatever they are, they are certainly not in keeping with the ethos of a conservation area. Not much information has been provided either as to what a speed table will look like- is it tarmac, paved, red or black or any other shade; will the cut granite kerbs be removed or damaged?

As I am permitted to comment only on the speed table outside no.18 Ernle Road, my reasons for my objection to this part of the scheme are as follows:-

1. Speeding occurs there is no doubt. It is not though continuous and has occurred for years and years. It is in fact less now than it used to be partly due to the volume of parked cars in the road and partly I believe to a sincere desire by the majority of drivers to heed the speed limit of 30 and a growing belief that in residential areas "20 is plenty".

At various points in years gone by residents have asked for the issue of excessive speed to be addressed, and their requests have gone unheeded. If no action has been taken to enforce a 30mph limit, why does anyone think that introducing a 20mph limit plus all the draconian measures "agreed", will make a jot of difference. The rogue motorist will still speed and the rest of us will suffer the inconvenience and ugliness of the altered street scene. The road traffic police should make unannounced visits armed with their portable speed gun at off peak
times and catch a few of the speeders. The word would soon get out that speeding is not tolerated.

2. The solution "proposed" will not solve the problem of excessive speed but will certainly destroy the visual amenity of the road. It will still be possible to build up considerable speed from the Copse Hill end of the road to the approximate centre point where the speed table is proposed to be. From this point on in the mornings from approx.07.40am, there is generally gridlock as rat-run cars negotiate the many parked cars from this point to the junction at Woodhayes Road. The parked cars remain in situ most of the day - a combination of residents, tennis club, commuters who park here for the day and staff and boys associated with King's College. Speeding therefore, at this end of the road and at this time of the day is fairly uncommon. The rogue motorist will continue to use the road and drive over the speed limit during off peak periods especially when travelling towards Copse Hill. From the mid point towards Copse Hill there is a bend and generally far fewer parked cars so it is possible to go at excessive speed though incredibly dangerous to do so. Again a visiting portable speed camera could assist greatly in eradicating this problem without the expense of fitting all the tables and signs as listed in the "proposals"

3. If the gradient of any speed table is set too high, cars will slow down and shift gear, cross the table and then accelerate away changing up gear, thus creating an unacceptable environmental condition both for noise and pollution.

4. If the gradient is lower, it will result that the dedicated speeder will bounce over it without having to slow down at all so making the introduction of the table an expensive white elephant that will blot the road scene for many a year to come.

5. The potential damage to low-bodied cars as they reverse out of and enter into steeply inclined driveways having to go over or get onto the raised table.

As I have lived in Ernle Road for 50 years at almost the centre point I would like to make the following comments. I have been a rate payer and now council tax payer and do not like to see the wasting of money as without doubt this scheme will be. It would appear to be a most appallingly administered affair. If the date on the newsletter is eight years out of date it does not exactly instil faith in the reader. The whole scheme as it stands is fundamentally flawed and should be scrapped. It would be nice think we could have

I recently saw a plan circulated to a select few by the Council which showed four speed tables in the road - one outside no 36 Ernle Road in addition to the three currently indicated. If the Council traffic managers felt that speed could only be reduced by having four speed tables in the road, one could argue that its removal confirms without doubt that the scheme cannot work as now proposed.

My own view is to leave the road as it is and for the road traffic police to enforce the current speed limit. If any traffic calming is to be introduced, the only thing I would support is a big "green" roundabout in the excessively large road area at the junction between Ernle Road and Wool Road. This I believe from other residents has already been discounted by the Council. I would like to know why judgement has already been made.

The whole scheme has been discussed and honed by a small group of residents talking in private with members of the Council. It would be nice think we could have
an open consultation involving all residents or at least this current exercise should have been expanded so that all aspects came under the consultation. As it is the whole thing has the air of being what they say in the vernacular" a stitch up"

**Officer Comments**

Comments noted.
The need for an effective traffic-calming feature at the proposed location is necessary in order to control the high speeds. The speed table will ensure speeds are kept low even in the absence of parked cars at that location. The gradients for the table have been chosen such that they are not excessive enough to damage vehicles nor shallow enough to not be effective in controlling speeds. Details such as the size of proposed signs and their locations on posts etc are deliberately left off consultation plans so as to keep the drawings legible and not confuse the readers. Consultees interested in such detail should contact the design engineer so as to be briefed further. The alternative measure/s have been considered in the past however were not taken forward for one or more of the following reasons:

1. Ineffective.
2. Initial cost / operational cost
3. Unpractical
4. Engineering difficulty
5. Safety reasons

It is believed that the majority of drivers will not exceed the posted speed limit by more than 10%. For a 20mph speed limit this means that the majority will travel at 22mph or less. For a speed limit posted as 30mph this would mean that the majority may travel upto 33mph. This is a significant difference if achievable and could mean a world of difference to someone being struck at a lower speed.

22013620

We agree to raised entry junctions at Ernle/Copse Hill and Ernle/Woodhayes, with the accompanying road signs.

We agree with the 20 mph speed limit in Ernle Road and the surrounding roads.

We do not agree with the raised platform outside 18 Ernle Road because of the pollution in noise and exhaust discharge caused by the slowing and acceleration of the car.

We would like to suggest:-

(1) A roundabout with a few small plants at the junction of Wool and Ernle roads, instead of the kerb build-out proposed. There are no access covers to drain/electricity/telephone/water at this junction. [Note: See * below]

(2) A small traffic island between 18/9 Ernle road which will be a visible deterrent to traffic entering the road but would not require breaking/accelerating at that point.

By making the use of Ernle road as a short cut look less desirable, both these measures in addition to those proposed should decrease both the speed and number of cars using it.

[*Note:- We live at (XYZ) Ernle road so will be inconvenienced by this roundabout, but we are most willing to propose this since it could result in the slowing down and decrease in traffic in both Ernle and Wool roads.]
We would like to say however, we had supported the original suggestion of a no left turn at the junction of Copse Hill and Ernle Road, which would have achieved both aims. We regret that the Council have abandoned this solution.

**Officer Comments**

Comments noted.

Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Measurements of nitrogen dioxide and surface ozone show no increase. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows. The need for an effective traffic-calming feature at the proposed location is necessary in order to control the high speeds.

The measures suggested as an alternative scheme cannot be implemented for one or more of the reasons listed below:

1. Ineffective.
2. Initial cost / operational cost
3. Unpractical
4. Engineering difficulty
5. Safety reasons

**22013620**

We are resident at (XYZ) Wool Road and have the following comments on this proposal.

We favour narrowing the entrance to Wool Road. The key problem is the turnoff into Wool Road from Ernle Road where cars corner too quickly.

We do not believe that the construction of speed bumps is necessary for Ernle Road because the number of parked cars on both sides of the road means that traffic cannot travel quickly along that road in any event.

A 20 mph limit is not objectionable, but we hope that the number of signs erected will be kept to an absolute minimum in keeping with what is, after all, a conservation area.

**Officer Comments**

Comments noted.

The need for an effective traffic-calming feature at the proposed location is necessary in order to control the high speeds. Other forms of traffic calming would not be as effective as a speed table. This is especially needed when cars are not parked at that location. The road signs are a legal requirement for the speed limit to be enforceable. However every attempt shall be made to reduce the number of repeater signs to the absolute minimum whilst keeping in line with regulation requirements.

**22013618**

I am writing to add my voice in strong and vehement opposition of the 20mph limit scheme for Dunstall, McKay and Wool Roads, for the following reasons.

1. There is virtually no traffic in Wool Road, McKay Road and Dunstall Road, so it is an unnecessary infringement for these three roads to be included with Ernle Road.
2. We have a beautiful conservation area. The presence of 24 20mph limit signs along the sides of these roads would totally alter the rural nature of this area.
3. The cost of putting up 24 speed signs is a waste of taxpayers' money.
4. It would not be enforceable and so is an unnecessary eyesore.

5. Changing speed zones creates an extra burden on the driver when they have to take their eye off the road to check their speed as well as to keep looking out or signs to see when they can return to normal speed and the confusion that arises if you've missed it.

6. Ernle Road is a short cut mainly in term time rush hour when there is queuing to the roundabouts at Copse Hill. The presence of so many parked cars in Ernle Road is in itself a deterrent. At other times of the day and year it is very quiet.

Can I conclude that Dunstall, McKay and Wool Roads do not have a safety issue; in fact we hardly have any car traffic at all so I strongly object to having these unnecessary speed limits imposed on us. It is also worth considering the increasing empirical evidence that traffic signals can, in the wrong places, be entirely counter-productive. We would not like to see this happening in this area.

I very much hope that the voices of the residents of these roads will be heard, and that the old saying ‘if it ain't broke, don't fix it’ be heeded with respect to these unnecessary proposals. Many thanks for your time and consideration in this issue.

Please confirm and acknowledge receipt of this email.

**Officer Comments**

Comments noted.

The need for an effective traffic-calming feature at the proposed location is necessary in order to control the high speeds on Ernle Road. The speed table will be effective especially when cars are not parked at that location. The road signs are a legal requirement for the speed limit to be enforceable. However every attempt shall be made to reduce the number of repeater signs to the absolute minimum whilst keeping in line with regulation requirements.

Though Wool, Dunstall and McKay roads may not have a problem at the time, experience from similar schemes shows that local roads near to a newly traffic calmed area can be affected by diverting traffic at a later date.

The scheme is designed to be enforceable but may not be classed as self-enforcing.

**22013617**

I am writing to you as a result of your consultation regarding the above. As a resident of Wool road, I sympathise with the plight of the inhabitants of Ernle Road. I am however concerned that the proposed plan may risk shifting the problem from Ernle road onto Wool/Mc Kay/Dunstall as traffic will try to avoid the proposed traffic calming measures.

I believe that the source of the problem is to be found and remedied first. Most mornings, as I walk up Wool road to make my way to Raynes Park station, I witness cars backing up along Copse hill and probably 2 to 3 cars out of 5 coming from the A3 veering into Ernle road as a short cut. Those cars are obviously heading towards Woodhayes/the Common/Parkside. The problem is therefore to be studied there but also on the connection between Copse Hill and Woodhayes. Unless this is tackled, the current measures are only likely to shift the problem onto our roads and as a result, I would rather see a “no left turn” enforced to traffic on Copse Hill coming from the A3.
However, if the current scheme was to be introduced, I would ask you to reconsider the number of signposts planned as there seem to be far too many of them. I would point out as a clear example of redundant signage the proposed sign in front of our house (bottom of Dunstall road) as drivers coming down Wool Road will have already seen a sign at the end of Wool road only 15 yards from the proposed sign on Dunstall.

In conclusion, my thoughts are as follows:
(1) address the cause rather than the effect,
(2) the only reliable solution for our neighbourhood is the “no left turn”,
(3) if the proposed scheme is introduced review the signage and be mindful that we, as residents, might come back to you regarding the effects of diverted traffic with a request for some action.

**Officer Comments**

Comments noted.

The road signs are a legal requirement for the speed limit to be enforceable. However every attempt shall be made to reduce the number of repeater signs to the absolute minimum whilst keeping in line with regulation requirements. No new sign posts are proposed for the 20mph repeater signs. All signs are to be mounted on existing lamp columns/posts.

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**22013616**

Thank you very much for the response. What follows is our considered response to the Consultation;

1. We are not convinced that a case has been made out by the Residents of Ernle Road that the traffic concerns warrant a 20 mph limit. We accept there is heavy traffic in the Road but there are no Accident statistics which indicate that measures should be introduced to deal with traffic flow. Speeding vehicles appear occasionally in Ernle Road as in other roads.

2. If a 20 mph limit is to be introduced then we think that raised junctions at the Ernle Road/Woodhayes/Copse Hill entries + 20 mph signs there only are more than sufficient. Ernle Road is not long enough to need a Table in the Road. That causes noise and environmental damage.

3. When a Parking Zone Consultation took place two years ago for the Area 100%, and we emphasise that percentage, of Wool Road residents signed a Petition against the Zone and in particular the painting of Lines in a Conservation Area. We have that Petition still. Conversations with Neighbours indicate a similar consistent view against 20 mph Signs on lampposts in Mckay, Dunstall and Wool Roads. We do not wish to have them.

4. The Residents of the 3 Roads do not need reminding and the large 20 mph Signs at the entry points will be more than sufficient for others since these 3 Roads are short and are not prone to speed.

5. The Signs will be intrusive in what is a rural Conservation Area, inappropriate and unacceptable to its residents. The expense should be saved.
Officer Comments

Comments noted.

The need for an effective traffic-calming feature at the proposed location is necessary in order to control the high speeds on Ernle Road. The speed table will be effective especially when cars are not parked at that location. The road signs are a legal requirement for the speed limit to be enforceable. However every attempt shall be made to reduce the number of repeater signs to the absolute minimum whilst keeping in line with regulation requirements.

22013621

I am writing to express some concerns about the introduction of a speed table outside No 18 Ernle Road.

There are two distinct problems relating to Ernle Road. First and most fundamental is the volume of traffic using it as a rat run to avoid the mini roundabout and the junction of Copse Hill, Ridgeway and Woodhayes Road. The current proposals do nothing to resolve this issue. Solve this primary problem and the secondary problem of cars speeding whilst using the road as a rat run will be significantly mitigated if not entirely resolved.

I assume that the Council has examined all possible options to ease traffic flow along Ridgeway (such as recessing the bus stops so that traffic can continue to flow whilst passengers are boarding/leaving the bus). It is this that causes the tailback down Copse Hill and thus encourages the use of Ernle Road as a rat run.

The secondary problem of cars speeding in the road is unlikely to be significantly reduced by the introduction of a speed ramp outside no 18. As you well know, cars will just speed up between the ramps, thus creating more noise as they accelerate and brake. Cars turning into Ernle Road from Copse Hill are already required to slow dramatically because of the angle of the junction. A speed platform at that junction will therefore not make any difference to driving speeds.

Cars then accelerate around the bend at the top of Wool Road, which your proposals do nothing to alleviate. The suggestion of the Ernle Road Steering Group to install a planted roundabout at the top of Wool Road would go some way to slowing traffic at this key point and I would support this suggestion.

Once the traffic is slowed in that part of the road, some further traffic calming along the straight part of the road would be desirable. As a resident I would much prefer the visually more appealing, and quieter option of chicanes or road narrowing so that traffic remains calm rather than accelerating and braking. Chicanes would also discourage use of the road at peak times as it would reduce the amount of traffic that the road could accommodate (thus addressing the primary problem at the same time).

May I make a couple of other suggestions not related to the scheme?

Firstly, outside King’s College School there is a zebra crossing. The road narrows just before the crossing such that when cars are parked legally just before the zig-zags, it is not quite possible for 2 vehicles always to be able to pass in opposite directions at that point. Two ordinary cars can manage but not large cars or vans. This significantly holds up the flow of traffic in the area at peak times and could be alleviated if just one car length of double yellow lines were painted at the end of the zig-zags on the Crooked Billet side of the crossing.
Second, the illegal parking of cars at the junction of Ernle Road and Woodhayes makes that junction very dangerous and really there needs to be enforced double yellow lines around that junction to stop parking. I hope you find these suggestion useful. Many thanks for reading and considering them

**Officer Comments**

Comments noted.

Research in Hull where there are about 114 20mph zones found no evidence of any increase in noise and air pollution due to speed humps. Noise measurements undertaken by local school children show very localised increases at the humps but an overall reduction due to decreased traffic flows. The need for an effective traffic-calming feature at the proposed location is necessary in order to control the high speeds. The measures suggested as an alternative scheme cannot be implemented for one or more of the reasons listed below:

1. Ineffective.
2. Initial cost / operational cost
3. Unpractical
4. Engineering difficulty
5. Safety reasons

**22013614**

Thank you for your letter of 23rd October and the accompanying plans in relation to the above-mentioned proposals. In general terms, police would not object to a 20mph speed limit, provided that it is in accordance with the relevant legislation and guidance. However, and not for the first time, we are concerned that this is not the case here.

The current guidance for a 20mph speed limit from the DfT in Circular 1/2006 is that they encourage and support 20mph limits “where there is a particular risk to vulnerable road users”. The first question police would ask is where is this particular risk? Is there an accident record or a particular reason why a 20mph speed limit is necessary?

Police note that the proposal is to sign the area as a speed limit. Circular 1/2006 advises that 20mph speed limits should be used for individual roads, or a small number of roads. Whilst it may be argued that by itself this is a small number of roads, in view of the fact that these zones are being proposed all across the borough, the likelihood is that it will soon be part of a much larger number of roads, and therefore, according to DfT guidance, not suitable to be signed as is currently proposed. If it is the aim of Merton to impose a 20mph speed limit across the borough in residential side streets, then police are of the opinion that this needs to be signed as one extremely large zone, not as a series of little limits.

The guidance on 20mph speed limits also states that they are only suitable for roads on which the existing speeds are already low. Police have not been given any results from speed surveys to confirm what the speeds are. However we are aware of the complaints from residents that Ernle Road is used as a rat-run. This would suggest that speeds here are not low, and therefore a 20mph limit as proposed is not in keeping with the current guidance. Indeed if the existing speeds were low, the proposed entry treatments and speed tables would be superfluous. That they are included in the proposal further suggests that the speeds here are not low enough for a limit to be used in keeping with the current guidance.

In view of all the concerns raised about the compliance of the proposal with current guidance, and our concern that if imposed the speed limit would not be self-enforcing, as the guidance makes clear it should be, police feel that we have no option other than to object to the proposal in its current form.
If I can be of any further assistance please do not hesitate to contact me.

**Officer Comments**

Comments noted.
The speed limit proposed for the roads is in accordance with relevant legislation.

The reason for the proposed 20mph limit is that residents of Ernle Road have reported excessive speeds within their road and as a result feel vulnerable. The council investigated this reporting in 2005 by conducting traffic surveys which included speed surveys within Ernle Road and found the basis of these claims to be true. The council found Ernle Road to be a priority to treat for this problem in 2008 when funding was made available.

This scheme is to encourage drivers to use more appropriate routes for their through routes whilst also encouraging those that decide to continue using Ernle Road to drive at slower speeds and with more consideration.

Currently the other roads within the scheme area are not reported to be suffering from an excessive speeding issue or rat running, however it is recognised that the introduction of a lower speed limit together with traffic calming measures in Ernle Road may result the traffic diverting to those roads. In order to combat this possibility, the 20 mph speed limit is also to be introduced to these vulnerable roads.

It is commonly accepted that most drivers will only flout the posted speed limit by 10%. Under the new speed limit this would mean that the majority of drivers would stick to around 22mph. A similar maximum speed for most drivers would be for the other roads within the scheme. However with the current limit of 30 mph this would mean a speed of about 33mph. An 11mph difference warrants the introduction of this scheme in Ernle Road. Previous speed surveys have indicated speeds in excess of 40mph in Ernle Road.

As it is accepted that the Police have limited resources in dealing with speed violations in residential roads, it is believed that every attempt should be made to encourage lower speeds wherever required.

Lower speeds go some way in reducing the severity of accidents.