Committee: Street Management Advisory

Date: 4th November 2008

Agenda item:

Wards: Abbey, Merton Park, Trinity, West Barnes, Cannon Hill, Dundonald, Wimbledon Park, Graveney and Figge’s Marsh

Subject: Borough wide 20mph zones / 20mph speed limit – Formal consultation results

Lead officer: Lyn Carpenter, Director of Environment & Regeneration

Lead member: Councillor William Brierly, Planning & Traffic Management

Key decision reference number: N/A

Contact officer: Alex Constantinides, Tel: 020 8545 3202, email: alex.constantinides@merton.gov.uk

Recommendations:

That the Street Management Advisory Committee consider the issues detailed in this report and recommend that the Cabinet Member in respect of 1-8 below and the Chief Executive in respect of item 9:

a) Notes the outcome of the formal consultation carried out during September and October 2008 on the proposed 20mph zone / 20mph speed limit for the following areas:

   1. Pelham Road area 20mph zone as shown on plan Z73-183-01;
   2. Trinity Road area 20mph speed limit as shown on plan Z73-184-01;
   3. Quick’s Road area 20mph speed limit as shown on plan Z73-193-01;
   4. Cecil Road area 20mph speed limit as shown on plan Z73-191-01;
   5. Merton Park area 20mph speed limit as shown on plan Z73-187-01;
   6. Melrose Avenue area 20mph speed limit as shown on plan Z73-189-01;
   7. Merton Hall Road area 20mph speed limit as shown on plan Z73-188-01;
   8. Ashbourne Road area 20mph speed limit as shown on plan Z73-194-01.
   9. Parkway area 20mph speed limit as shown on plan Z73-185-01

All plans are attached as Appendix 1.

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

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

d) To proceed with the making of the Traffic Management Order (TMO) and the implementation of the proposed zones and limits as listed above.

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

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

1.1 This report brings to the Cabinet Member’s attention the results of the formal consultations carried out within the following areas for a 20mph zone / 20mph speed limit:

   a) Pelham Road area 20mph zone as shown on plan Z73-183-01;
b) Trinity Road area 20mph speed limit as shown on plan Z73-184-01;

c) Quick’s Road area 20mph speed limit as shown on plan Z73-193-01;

d) Cecil Road area 20mph speed limit as shown on plan Z73-191-01;

e) Merton Park area 20mph speed limit as shown on plan Z73-187-01;

f) Parkway area 20mph zone as shown on plan Z73-185-01;

g) Melrose Avenue area 20mph speed limit as shown on plan Z73-189-01;

h) Merton Hall Road area 20mph speed limit as shown on plan Z73-188-01;

i) Ashbourne Road area 20mph speed limit as shown on plan Z73-194-01.

1.2 This report recommends that the representations received, as summarised in Appendices 3, are considered and approval is sought to make and publish the Traffic Management Order for the implementation of the above proposals except for Parkway area.

2 DETAILS

2.1 It is the Council’s policy to improve road safety by reducing vehicular speeds and volume on borough roads. The key objective of these proposals are to convert existing traffic calmed roads within the proposed areas into 20mph zones / 20mph speed limits. The majority of roads have traffic calming measures in place, therefore minimum changes are required for the introduction of these measures.

2.2 20mph zones / 20mph speed limits are dedicated areas where improving safety and maintaining the quality of life for local residents takes precedence over the general objective to ease traffic flows.

2.3 For a 20mph zone, traffic calming features in the form of road humps; speed cushions; road closures; one way systems; pedestrian refuge islands and road narrowing are required to achieve a legal and self-enforceable zone. A 20mph speed limit, however, does not require any form of traffic calming features as part of the legal process. Signs and road markings are mandatory within zones and limits.

2.4 The existing traffic calmed roads within the borough were grouped into 18 different areas including four existing 20mph zones (Wimbledon area, St Heliers area, Graveny and Bodnant Gardens area). The plan, which shows the various areas, is included in Appendix 2.

2.5 For the introduction of a zone, the approach has been to propose a minimum number of traffic calming features and only consider speed cushions, and in areas that require many additional features, a limit is being proposed. Raised entry treatments, raised junctions or road humps were not to be considered within the proposals since most residents are not in favour of these features. A ‘priority give way’ system was also considered, but due to the associated loss of parking, these features often prove unpopular. Additionally, many of these roads are within Controlled Parking Zones (CPZ); and it should be borne in mind that introducing ‘priority give way’ system will result in the loss of approximately six parking spaces per location. As resident parking is in high demand and scarce, reducing parking would be rejected by the residents who have purchased parking permits.

2.6 Each area was considered as a 20 mph zone, but where many new features were required to achieve a legal and self-enforceable zone, then the area should be considered for a 20mph speed limit. Ward Councillors were also given the opportunity to decide which measure is best for the relevant area within their ward.
2.7 It should be noted that some traffic speed and volume surveys have been carried out but it is proposed to undertake comprehensive surveys before December 2008 and if proposals are agreed to undertake after surveys to determine the effectiveness of the proposed measures.

2.8 The current speed limit on all the roads within the proposed areas is 30mph. The objective of the proposals is to reduce speed, number of accidents and severity.

2.9 Following liaison with the Cabinet Member and Ward Councillors, the following areas have been formally consulted for a 20mph zone:

Pelham Road area
2.9.1 Pelham Road area bounded by The Broadway, Queen’s Road, Trinity Road, South Park Road and Haydon’s Road was considered as a 20mph zone. To satisfy the legal requirements, the proposal includes the introduction of four sets of speed cushions on Griffith Road (this is the only road within the proposed area without any traffic calming features). The locations of the proposed speed cushions are within the vicinity of Nos 2, 20, 40 and 58 Griffiths Road.

A traffic speed survey conducted on some of the roads within the area recorded an 85 percentile speed (speed beneath which 85 out of 100 vehicles surveyed travelled at) of 29.6 mph on Griffiths Road. Most of the 85 percentile speeds on the existing traffic calmed roads within the area was approximately 27mph except for Southey Road, which recorded an average of 29.1 mph. The recorded vehicular speed on the roads surveyed within the proposed area, were all lower than the currently permitted national speed of 30mph. It is anticipated that the conversion of this area into a 20mph zone is likely to result in a reduction of vehicular speeds.

Parkway area
2.9.2 Parkway area bounded by Grand Drive, Cannon Hill Lane, Parkway, Berrylands and Cannon Close was also considered for a 20mph zone. The conversion of this area into a proposed zone requires four sets of speed cushions on Southway, within the vicinity of numbers 3, 43/45, 71/73 and between Elm Walk and Parkway. Two sets of speed cushions area also required on Meadow Close within the vicinity of numbers 11 and 43/45.

A traffic speed survey was carried out in July 2008 on some of the roads within the area. The highest recorded speed of 30mph was on Parkway, which has existing traffic calming measures. It is anticipated that the conversion of this area into a 20mph zone may result in vehicular speeds being reduced.

2.9.3 Members will note that Parkway area will be considered by and a decision made by the Chief Executive under the delegation in place for this purpose as approved by Cabinet on 17.07.2006, (i.e. when the Cabinet Member is unable to take a decision due to a conflict of interest).

Trinity Road area
2.10.1 Trinity Road area bounded by The Broadway, Queen’s Road, Trinity Road, South Park Road and Haydon’s Road is being considered for a 20mph speed limit. Since nine additional features would be required for a legal zone, ward councillors opted for a speed limit.

A traffic survey was carried out in July 2008 on some of the roads within the proposed boundary. The highest recorded speed of 34mph was recorded on Queen’s Road. In agreement with the ward members, to address the speed on Queen’s Road, two sets of
speed cushions are being proposed within the vicinity of Nos. 94 and 116 Queen’s Road. As a complementary feature, it is also proposed to erect a vehicle activated signs (VAS) within the vicinity of the Priory Primary School on Queen’s Road. It is anticipated that the proposed measure would help reduce traffic speeds.

**Quick’s Road area**

2.10.2 Quick’s Road area bounded by South Park Road, Haydon’s Road, Merton Road and Merton High Street is being considered for a 20mph speed limit. This is because of the large number of features that would be required to achieve a legal and self-enforceable zone. Quick’s Road is the only road within this proposed area with traffic calming features. As the area is within a CPZ with parking permitted on both sides of the road restricting the carriageway to one lane and most of the roads that merge with Merton High Street do not accommodate through traffic, it is considered that it is difficult to speed thereby enabling the implementation of an effective limit.

**Cecil & Balfour Roads**

2.10.3 This area bounded by Merton Road, Kingston Road and Cecil Road is being considered for a 20mph speed limit. For a zone, a number of additional traffic features would be required and it was envisaged that this would have been met with strong objections. Due to the nature of the roads and that Balfour Road is one way eastbound it is believed that a limit could be effective.

**Merton Park area**

2.10.4 Merton Park area bounded by Crown Lane, section of Martin Way, Cannon Hill lane, Kingston Road, Dorset Road, and Morden Road is being considered for a 20mph speed limit. This is because a total of 31 additional speed cushions would be required to convert this area into a zone. Ward councillor would have preferred to personally consult their residents, prior to Council’s consultation, via their newsletter to determine their resident’s preference. This newsletter was due to be sent out to residents in October 2008, but since this would have affected the scheme programme, the ward councillors agreed to the undertaking of a formal consultation on a 20mph limit which was carried out during September.

**Melrose Avenue area**

2.10.5 Melrose Avenue area bounded by Revelstoke Road, Arthur Road, Dunsford Road and Melrose Avenue (inclusive) is being considered for a 20mph speed limit. This is because 21 additional speed cushions would be required to convert this area into a zone.

**Merton Hall Road area**

2.10.6 Merton Hall Road area bounded by Dundonald Road, Kingston Road, Kingswood Road (inclusive) and Lower Downs Road is being considered for a 20mph speed limit. This is because 31 additional speed cushions would be required to convert this area into a zone.

**Ashbourne Road area**

2.10.7 Ashbourne Road area bounded by Ashbourne Road, Streatham Road and London Road is being considered for a 20mph speed limit. This is because a total of 32 additional speed cushions would be required to convert area this into a zone.
3 ALTERNATIVE OPTIONS

3.1 To abandon the proposals. This would not deliver Merton’s commitment to 20’s plenty.

3.2 To introduce a 20mph speed limit throughout the borough. It is considered that any proposed measure must/should be effective. Police are responsible for speed enforcement and due to their limited resources, they are often unable to effectively and routinely enforce speed related offences. Consequently, police do not often support a limit. In the areas identified, where there are traffic calming measures that do not meet the current regulations or due to the nature of the roads that causes speed to reduce, it is considered that a limit could be effective and beneficial to the area.

3.3 To introduce a zone throughout the borough. This is the most effective way of reducing speed of traffic. To adhere to the regulations, however, the appropriate number of speed reducing features are necessary. These features are often met with strong objections because of the associated noise, vibration, loss of parking and inconvenience. Within the identified already traffic calmed areas, therefore, those areas that require very few additional features are being put forward for a zone. It is considered that a zone is effective and beneficial to the area.

3.4 The implementation of the proposed facilities will not result in any loss of parking spaces as parking can take place over the proposed speed cushions.

4 CONSULTATION UNDERTAKEN

Formal consultation

4.1 Following instructions from the Cabinet Member formal consultations for the above areas were undertaken during September and October 2008. It should be noted that all representations received after the closing date have been included in this report. The consultation included the erection of street notices on lamp columns in the area; the publication of the Council’s intentions in the Local Guardian and the London Gazette. Consultation documents were also available at Merton Link in the Civic Centre, on the Council’s website and local libraries in the area. Additionally, a newsletter with a plan as shown in Appendix 4, was also circulated to all properties included within consultation area. All ward councillors were given advance copies of the newsletter.

Pelham Road area

4.2 1181 newsletters (Appendix 4), which included the proposals and a plan of the proposed 20mph zone were delivered to all those premises within the proposed zone. The closing date was 19 September 2008. The plan also showed the locations of the additional traffic calming features. The consultation resulted in 17 representations. All representations and officer’s comments are detailed in Appendix 3. The table below shows the breakdown of the comments received.

<table>
<thead>
<tr>
<th>Support</th>
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<th>Comment</th>
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<tbody>
<tr>
<td>13</td>
<td>2</td>
<td>2</td>
<td>17</td>
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Parkway area

4.3 613 newsletters (Appendix 4), which included the proposals and a plan of the proposed 20mph zone were delivered to all those premises within the proposed zone. The plan also showed the locations of the additional traffic calming features. The closing date was 19 September 2008. The consultation resulted in 19 representations. All representations and officer’s comments are detailed in Appendix 3. The table below shows the breakdown of the comments received.
Trinity Road area

4.4 1447 newsletters (Appendix 4), which included the proposals and a plan of the proposed 20mph limit were delivered to all those premises within the proposed zone. The plan also showed the addition traffic calming features required on Queen’s Road. The closing date was 19 September 2008. The consultation resulted in 19 representations. All representations and officer’s comments are detailed in Appendix 3. The table below shows the breakdown of the comments received.

<table>
<thead>
<tr>
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<tbody>
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<td>6</td>
<td>6</td>
<td>19</td>
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</table>

Quick’s Road area

4.5 814 newsletters (Appendix 4), which included the proposals and a plan of the proposed 20mph limit were delivered to all those premises within the proposed zone. The closing date was 19 September 2008. The consultation resulted in 5 representations. All representations and officer’s comments are detailed in Appendix 3. The table below shows the breakdown of the comments received.

<table>
<thead>
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<td>5</td>
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Cecil Road area

4.6 132 newsletters (Appendix 4), which included the proposals and a plan of the proposed 20mph limit were delivered to all those premises within the proposed zone. The closing date of 19 September 2008. The consultation resulted in 3 representations. All representations and officer’s comments are detailed in Appendix 3. The table below shows the breakdown of the comments received.

<table>
<thead>
<tr>
<th>Support</th>
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<th>Total</th>
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<tbody>
<tr>
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<td>1</td>
<td>0</td>
<td>3</td>
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Merton Park area

4.7 2326 newsletters (Appendix 4), which included the proposals and a plan of the proposed 20mph limit were delivered to all those premises within the proposed zone. The closing date was 10 October 2008. The consultation resulted in 78 representations. All representations and officer’s comments are detailed in Appendix 3. The table below shows the breakdown of the comments received.

<table>
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<th>Support</th>
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<tbody>
<tr>
<td>43</td>
<td>33</td>
<td>1</td>
<td>78</td>
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4.7.1 The consultation exercise carried out by Merton Park ward councillors who distributed 2200 leaflets, included a letter and questionnaire (Appendix 5A). The letter explained the process and encouraged every resident to respond. The questionnaire also asked if residents were in favour of the proposals or not. 480 leaflets were returned to the ward councillors by the closing date of 10 October 2008. The table below shows the breakdown of the responses. The breakdown of the various comments are included in (Appendix 4A). As part of their comments, the ward councillors wished their newsletter
regarding their consultation to be included within this report. This newsletter is attached as appendix 5B.

<table>
<thead>
<tr>
<th>Support</th>
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<tr>
<td>250</td>
<td>230</td>
<td>480</td>
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</table>

4.8 **Melrose Avenue area**

1113 newsletters (Appendix 4), which included the proposals and a plan of the proposed 20mph limit, were delivered to all those premises within the proposed zone. The closing date was 10 October 2008. The consultation resulted in 9 representations. All representations and officer’s comments are detailed in Appendix 3. The table below shows the breakdown of the comments received.

<table>
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<tr>
<th>Support</th>
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<tr>
<td>9</td>
<td>0</td>
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4.9 **Merton Hall Road area**

2326 newsletters (Appendix 4), which included the proposals and a plan of the proposed 20mph limit were delivered to all those premises within the proposed zone. The closing date was 17 October 2008. The consultation resulted in 23 representations. All representations and officer’s comments are detailed in Appendix 3. The table below shows the breakdown of the comments received.

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<tbody>
<tr>
<td>12</td>
<td>9</td>
<td>2</td>
<td>23</td>
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4.10 Of the 23 responses received, there were 9 residents who requested that traffic calming measures be incorporated into the scheme in the form of road humps or one-way systems. In the absence of a strong objection, it is recommended that the proposed 20mph limit be approved. Should the proposals be implemented, it is recommended that consideration be given to the introduction of traffic calming measures as part of an after study, subject to available funding and resources.

4.11 **Ashbourne Road area**

2326 newsletters (Appendix 4), which included the proposals and a plan of the proposed 20mph limit were delivered to all those premises within the proposed zone. The closing date was 17 October 2008. The consultation resulted in 7 representations. All representations and officer’s comments are detailed in Appendix 3. The table below shows the breakdown of the comments received.

<table>
<thead>
<tr>
<th>Support</th>
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<tbody>
<tr>
<td>2</td>
<td>5</td>
<td>0</td>
<td>7</td>
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4.12 Of the 8 responses received, 3 residents requested traffic calming measures to be incorporated into the scheme and 3 residents requested traffic calming measures be installed specifically in St James Road. Of the 5 against the scheme, 3 requested traffic calming be introduced, as they believe a 20mph limit without measures would be ineffective. In the absence of a strong objection, it is recommended that the proposed 20mph limit be approved. Should the proposals be implemented, it is recommended...
that consideration be given to the introduction of traffic calming measures as part of an after study, subject to available funding and resources.

4.13 13,431 consultation leaflets have been distributed through the nine areas and 100 representations have been received. In overall terms, majority of respondents are in favour of the proposals with a relatively small number of respondents against. Full details are attached as Appendix 4.

Comments from Metropolitan Police

4.14 Police would make the following observations.

The first observation, in general terms, is that police do not object to 20mph speed limits in residential areas provided that they are legally signed. The second observation we would make is that these 20mph zones and limits should be self-enforcing. Should it be found that the proposals do not bring about the expected lower speeds, police would expect further measures to be added to achieve the necessary speed reduction. Speed enforcement in these areas will not be a police priority.

Officer comments
The proposed 20mph zones / 20mph speed limits would be legally signed. The drawings which were sent to the police were the consultation drawings, which often do not include details of signage and road markings. Following an informal discussion with the police, a copy of the detailed design drawings has been sent to the police which will no doubt result in the withdrawal of their objections raised. It is acknowledged that 20mph zones are meant to be self-enforcing and those proposed will be and 20 mph speed limits will be signed and marked appropriately.

4.14.1 Cecil Road Area
Police would object to the proposal, as we do not believe it to be legally signed. There is no proposed traffic calming, as we believe is necessary to create a zone, and there is no indication that there will be any repeater signs as required to sign a 20mph limit. The only signing appears to be double-sided signs in Balfour Road, as in a zonal entry style of signing. Police find this slightly concerning, as at the time of our last visit Balfour Road is one-way. We are therefore somewhat curious as to why the need is felt to let traffic entering Balfour Road contrary to the “No Entry” signs at the Merton Road end that they are limited to 20mph. Indeed, police feel that signing the speed limit in this manner may actually encourage people to contravene the No Entry restriction; as if they can see a sign explaining the new speed limit to them then they might not unreasonably consider that they can drive down Balfour Road in that direction.

Officer comments
The area is being considered for a limit. The roads will be legally marked and signed as per the regulations. There will be no changes to the traffic movement on Balfour Road, as it will still remain a one way.

4.11.2 Quicks Road Area
Police would object to the proposal, as we do not believe it to be legally signed. There is no proposed traffic calming, other than the existing calming in Quicks Road, as we believe is necessary to create a zone, and there is no indication that there will be any repeater signs as required to sign a 20mph limit. Despite the schedule declaring that Cardigan Road, Haccombe Road, Victory Road, Nelson Road and Hardy Road will all be 20 mph limits there appears to be no intent to sign them from their respective entry points in Haydons Road and Merton High Street. Police accept that the bottom end of Victory Road, Nelson Road and Hardy Road are closed off; however if they are to be subject to a new limit then it must be signed.
4.11.3 Trinity Road Area
Police would object to the proposal, as we do not believe it to be legally signed, and because we have grave concerns about the wisdom of such a layout. Approximately 80% of the zone has existing calming, so adding to this would easily create a zone. The proposal appears to be to sign zonally so there needs to be some additional traffic calming to make this lawful. However, the proposal is for a 20mph limit, yet again without repeaters and so therefore not legal. This is bad enough in itself, but to sign a 20mph speed limit in an area so rich in existing calming will only serve to add confusion to existing zones where there are no such repeater signs.

The proposed signing also seems to overlook the fact that Bridges Road and Wycliffe Road are part of the proposed Quicks Road Area 20mph zone, so traffic entering them from South Park Road may well still be in a 20mph limit but will according to the signing will be entering a 30mph area.

4.11.4 Parkway Road Area
Provided that the traffic calming is placed in such a manner that the scheme complies with the requirements of the TSRGD 2002, police would have no objection to the proposal.

4.11.5 Pelham Road Area
Provided that the traffic calming is placed in such a manner that the scheme complies with the requirements of the TSRGD 2002, police would have no objection to the proposal. However as we have established that at least one road in the proposed scheme does not comply with this, and will therefore effectively leave the whole area without an enforceable speed limit, we are duty bound to object to this proposal. We would also make observation that, in view of the resident’s complaints regarding speeding vehicles during the diversion resulting from the gas works and the subsequent checks, it could be considered questionable as to how effective some of this calming is and whether or not it should not be improved in order to achieve its objective.

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4.11.6 Ashbourne Road Area
The first observation, in general terms, is that police do not object to 20mph speed limits in residential areas provided that they are legally signed. The second observation we would make is that these 20mph zones and limits should be self-enforcing. Should it be found that the proposals do not bring about the expected lower speeds, police would expect further measures to be added to achieve the necessary speed reduction. Speed enforcement in these areas will not be a police priority.

As regards the proposals for these roads, police would object to both in their current form, as we do not believe it to be legally signed, and because we have grave concerns about the wisdom of such a layout. A number of roads in both proposed areas have existing traffic calming so adding to this would easily create a zone. The proposals appear to be signed zonally so there needs to be some additional traffic calming to make this lawful. However the proposal is for a 20mph limit, apparently without repeater signs, and so therefore not legal. This is bad enough in itself, but to sign a 20mph speed limit in areas so rich in existing calming will only serve to add confusion to existing zone where there are no such repeater signs. If the proposal is to achieve its intention as described in the statement of reasons then police believe it needs to be better designed; as it stands it is, in our opinion, halfway between two stools and as such we feel it is unlikely to achieve its stated aims, and could well drag other existing zones into disrepute.

Officer comments
This area is being considered for a limit and would be marked / signed as per the regulation including repeater signs. It is agreed that it would be simple to convert this area into a zone; however, ward councillors did not wish to see any further traffic calming features thereby invalidating a zone. Consequently, it has been agreed to introduce a limit rather than the zone.

4.11.7 Merton Park Area
Police would object to this in its current form, as we do not believe it to be legally signed, and because we have grave concerns about the wisdom of such a layout. A number of roads in the proposed area have existing calming, so adding to this would easily create a zone. The proposal appears to be to sign zonally so there needs to be some additional traffic calming to make this lawful. However the proposal is for a 20mph limit, apparently without repeater signs, and so therefore not legal. This is bad enough in itself, but to sign a 20mph speed limit in areas so rich in existing calming will only serve to add confusion to existing zones where there are no such repeater signs. If the proposal is to achieve its intention as described in the statement of reasons then police believe it needs to be better designed; as it stands it is, in our opinion, halfway between two stools and as such we feel it is unlikely to achieve its stated aims, and could well drag other existing zones into disrepute and create problems where none currently exist.

Officer comments
This area is being considered for a limit and would be marked / signed as per the regulation including repeater signs.

4.11.8 Melrose Avenue Area
Police would object to the proposal, as we do not believe it to be legally signed. There is no proposed traffic calming, as we believe is necessary to create a zone, and there is no indication that there will be any repeater signs as required to sign a 20mph limit. The only signing appears to be a zonal entry style signing, which is in keeping with a 20mph zone, but not the proposed limit. Police are also somewhat curious as to why the need is felt to let traffic entering Melrose Avenue from Arthur Road, contrary to the “No Entry”
signs, that they are limited to 20mph? Indeed, police feel that signing the speed limit in this manner may actually encourage people to contravene the No Entry restrictions; as if they can see a sign explaining the new speed limit to them then they might not unreasonably consider that they can drive down Melrose Avenue in that direction. Finally we note that whilst the eastern end of Ryfold Road is shown within the 20mph limit on the plan and listed in the schedule, there appears to be no intention to sign the road to that effect.

Officer comments
Before and after the implementation of the 20mph speed limit, traffic volumes, speeds and accident statistics will be carried out and reviewed in order to determine the impact of the proposed 20mph speed limit. If necessary further traffic calming measures will be investigated. In response to the need for repeater signs, these will be installed where necessary in accordance with the regulations. The signing of Melrose Avenue from Arthur Road shall only include an exit sign showing the increase in speed to 30mph on Arthur Road. A speed limit entry or exist sign is not required at Ryfold Road, due to a gated closure there is no access from Durnsford Road.

4.11.9 Merton Hall Road
Thank you for your letter of 26th September and the accompanying plans in relation to the above-mentioned proposal. Police would make the following observations.

The first observation, in general terms, is that police do not object to 20mph speed limits in residential areas provided that they are legally signed and installed in accordance with DfT guidelines. The second observation we would make is that these 20mph zones and limits should be self-enforcing. Should it be found that the proposals do not bring about the expected lower speeds, police would expect further measures to be added to achieve the necessary speed reduction. Speed enforcement in these areas will not be a police priority.

As regards to the proposals for this area, police would object to both in their current form, as we do not believe it to be legally signed, and because we have grave concerns about the wisdom of such a layout. A number of roads in both proposed areas have existing calming, so adding to this would easily create a zone. The proposal appears to be to sign zonally so there needs to be some additional traffic calming to make this lawful. However the proposal is for a 20mph limit, apparently without repeater signs, and so therefore no legal. This is bad enough in itself, but to sign a 20mph speed limit in areas so rich in existing calming will only serve to add confusion to existing zones where there are no such repeater signs. If the proposal is to achieve its intention as described in the statement of reasons then police believe it needs to be better designed; as it stands it is, in our opinion, halfway between two stools and as such we feel it is unlikely to achieve its stated aims, and could well drag other existing zones into disrepute.

Officer comments
Before and after the implementation of the 20mph limit, traffic volumes, speeds and accident statistics will be carried out and reviewed in order to determine the impact of the proposal. If necessary further traffic calming measures will be investigated. With regards to the need for repeater signs these will be installed where necessary in accordance with the regulations.

Comments from London Borough of Wandsworth
4.11.10 The following comment was received from Wandsworth Council regarding the proposals.
(a) It would appear from your proposals that the 20 mph limit is not proposed for Revelstoke Road. Please confirm that this is the case. This Council would object to Revelstoke Road being included in a 20mph limit, on the basis that recorded vehicular speeds are not below 24mph and that traffic calming would need to be
implemented to help reduce speeds. You may be aware that our Executive has approved a London Cycle Network scheme to introduce traffic calming measures along Revelstoke Road, subject to the outcome of consultation. We have undertaken consultation with Merton Council on these proposals and it would appear that there are concerns that would need to be resolved to progress this further. In light of your proposals for this 20mph limit adjacent to Revelstoke Road, I would welcome the opportunity to discuss our proposals for Revelstoke Road with the appropriate officers at Merton.

(b) Do you have vehicular speed survey information available so that we can understand and comment on how you intend on implementing a 20mph limit in the surrounding roads.

(c) From my understanding it is a statutory requirement for a 20mph limit to have regular repeater signing in accordance with paragraph 11 of the Traffic Sign Regulations and General Directions 2002. The Council has also received guidance from our local Police representative regarding the signing of 20mph limits. This states that repeater signs need to be erected. Therefore can you please confirm that additional repeater signs will be installed at regular intervals in accordance with the regulations?

(d) Is this proposal part of an area wide or borough wide Council initiative to introduce 20 mph zones in Merton? You will be aware of the Mayor’s recent statement regarding “blanket” 20 mph speed limits/zones in London.

(e) How would any approved works associated with these new speed limits be funded? I await your response to these comments and will contact next week regarding the issue outlined in (a). However if you require any clarification of the points made then please contact me.

Officer comments

The comments below have been made with regards to each part of the response.

Revelstoke Road is not included within the Melrose Ave Area scheme. However, it is being considered separately for a 20mph Zone/Limit. A liaison meeting will be held with LB Wandsworth to progress this matter further and independently of the proposed Melrose Ave area speed limit.

No vehicular speed surveys have been conducted, but these will be done before and after the implementation of the proposed scheme, after which the impact shall be reviewed to determine whether or not further traffic calming features are required.

Repeater signs will be installed where necessary in accordance with the regulations. This proposal is in line with Merton’s commitment to reduce speed borough wide, particularly on existing traffic calmed roads. The scheme is council funded.

5. Recommendations

5.1 It is recommended that the proposals for the different areas, as detailed in the attached plans be approved for the making of the necessary Traffic Management Orders (TMOs) and the implementation of the proposed measures.

7. TIMETABLE

7.1 If approved, the Traffic Management Orders for the proposed area would be made and the measures implemented by 31 March 2009.
8. **FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS**

8.1 A substantial £20 million investment programme has been put together for this fiscal year to potentially deliver 20mph/limits throughout the borough subject to consultation. The original settlement was made up of a total of £500k Merton capital budget.

8.2 This proposal has been identified through Merton capital and the approximate scheme value of £352k exclusive of design cost is contained within this capital stream. If approved, to successfully deliver within this fiscal year will require good forward planning and project management. Firm targets for phasing and achieving spend will be necessary as all capital monies are time limited and will have to achieve full spend by 31st March 2008. It is imperative, therefore, to avoid as far as possible back loading spend to the end of the financial year and that consultation must be completed as early as possible.

9. **LEGAL AND STATUTORY IMPLICATIONS**

9.1 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.

9.2 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.

10. **HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS**

10.1 The Council carries out careful consultation to ensure that all road users are given a fair opportunity to air their views and express their needs. The needs of the residents are given consideration but it is considered that improving safety on the borough roads take priority over environmental issues like noise and pollution.

10.2 Bodies representing motorists, including commuters are included in the statutory consultation required for draft traffic management and similar orders.

10.3 The implementation of 20mph zone / 20 mph speed limit affects all sections of the community especially the young and the elderly; and assists in improving safety for all road users as well as achieving Merton’s commitment in reducing speed, casualty and severity of road traffic accidents.

11 **CRIME AND DISORDER IMPLICATION**

11.1 N/A

12. **RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS**

12.1 The risk in not introducing the proposed 20mph zones / 20mph speed limit will not address the concerns raised by some residents regarding excessive speed. The introduction of these facilities is likely to result in reduction in traffic flows, speed and casualty.

12.2 The introduction of the proposed speed cushions within some of the areas may result in an increased or no change in noise levels. This depends on driver behaviour and type of vehicle. Speed cushions will be constructed in such a manner so as to allow larger vehicles to straddle thereby minimizing noise and vibration.
12.3 The road safety implications/risks during construction and maintenance have been fully considered at each stage of the design process.

12.4 As this is a Merton Capital funded scheme, TfL are not obliged to undertake a road Safety Audit. No Safety Audit has been undertaken by external consultants, however one will be required in accordance with the Highways Agency design note on Road Safety Audits.

12.5 The Construction (Design and Management) Regulations 1994 apply to this scheme. Therefore when undertaking its duties as Client and Designer under these regulations, the Council follows the Approved Code of Practice, 'Managing Health and Safety in Construction', published by the Health and Safety Commission. The Planning Supervisor appointed for this scheme is F.M.Conway Ltd.

12.6 Potential risks have been identified during the preliminary and detailed design stages. Therefore, the measures have been designed accordingly to manage them, theses are detailed in the table below.

Management of Health and Safety Risks

<table>
<thead>
<tr>
<th>Risk</th>
<th>Measures to Reduce Risk</th>
<th>Information on Residual Risk Passed To</th>
</tr>
</thead>
<tbody>
<tr>
<td>Volume of traffic during peak periods</td>
<td>The appropriate traffic management would be put in place to ensure access and maintain through traffic. Every effort will be made to undertake construction outside morning and after school peaks.</td>
<td>• Highways Project Officers undertaking detailed design</td>
</tr>
<tr>
<td>Areas outside school</td>
<td></td>
<td>• Planning Supervisor</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Bus operators and emergency services</td>
</tr>
</tbody>
</table>

13 Appendices – the following documents are to be published with this report and form part of the report:


Appendix 2 – borough wide plan of proposed/identified areas.

Appendix 3 - Representations and officers’ comments.

Appendix 4 – Consultation documents.

14 Background Papers – the following documents have been relied on in drawing up this report but do not form part of the report:

Department for Transport’s Traffic Calming - Local Transport Note 1/07 March 2007

Useful links

Merton Council’s Web site: http://www.merton.gov.uk

Readers should note the terms of the legal information (disclaimer) regarding information on Merton Council’s and third party linked websites.

http://www.merton.gov.uk/legal.htm

This disclaimer also applies to any links provided here.