26 September 2008

Dear Merton Park Ward Resident,

2. **Consultation on 20 mph speed limit in Merton Park**

Recently you received a newsletter from Merton Council announcing a statutory consultation on the introduction of a 20 mph speed limit in Merton Park. It is vital that you respond to this consultation and make your views known, whether you are for or against the introduction of a 20 mph limit. If no one responds a 20 mph limit **will be introduced**, since this is a manifesto commitment of the Administration.

As your Ward Councillors we have always believed that you should have the final say on matters that affect you in your daily lives, whether it be education, parking or local speed limits. We are open-minded about the introduction of a 20 mph limit, and pledge to support the view of the majority of our residents, provided enough respond to ensure the consultation is representative.

Some of the points for you to consider before responding are:

- there will be 11 points of entry to the zone, 4 of them in the John Innes (Merton Park) Conservation Area. These will be marked with 20 mph signs, which will also be painted on the road
- there will be no static enforcement measures such as speed cameras
- there will be no additional traffic calming measures to reduce traffic speeds
- currently the police do not enforce 20 mph limits, only 30 mph limits – the value of a 20 mph limit depends on its effectiveness as a deterrent
- no information is available on average traffic speeds in Merton Park
- we have not been given any information on traffic accidents in Merton Park in which speed has been a contributory factor

To make it easy for you to respond we have included a simple reply paid questionnaire. Be sure to give your reasons for voting for or against the proposed 20 mph limit, and send in your questionnaire to reach us by Friday 10 October 2008

Please contact us if you have questions or would like to discuss this proposal.

Yours sincerely,

Karin Forbes  
Peter Southgate  
Krysia Williams

8540 3314  
8542 2053  
8542 8687

karin.forbes@merton.gov.uk  
peter.southgate@merton.gov.uk  
krysia.williams@merton.gov.uk

www.merton.gov.uk
# Merton Ward Councillors Analysis

## FINAL TOTAL - Oppose

<table>
<thead>
<tr>
<th>No.</th>
<th>Description</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Unenforceable/police will not enforce/no deterrent</td>
<td>42</td>
</tr>
<tr>
<td>2</td>
<td>Unnecessary/speeds not excessive e.g. traffic density, parked vehicles</td>
<td>26</td>
</tr>
<tr>
<td>3</td>
<td>No evidence of need</td>
<td>28</td>
</tr>
<tr>
<td>4</td>
<td>Unsightly street signage/additional clutter</td>
<td>15</td>
</tr>
<tr>
<td>5</td>
<td>Speed humps/traffic calming control speeds now</td>
<td>21</td>
</tr>
<tr>
<td>6</td>
<td>Opposed to more traffic calming/humps</td>
<td>12</td>
</tr>
<tr>
<td>7</td>
<td>Waste of money/money better spent elsewhere</td>
<td>30</td>
</tr>
<tr>
<td>8</td>
<td>Increased pollution/petrol consumption/environmental damage</td>
<td>3</td>
</tr>
<tr>
<td>9</td>
<td>Contrary to police/government guidance</td>
<td>1</td>
</tr>
<tr>
<td>10</td>
<td>Other inc. zone</td>
<td>10</td>
</tr>
</tbody>
</table>

Total oppose = 228

## FINAL TOTAL - Support

<table>
<thead>
<tr>
<th>No.</th>
<th>Description</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Safer/Improved safety/reduce accident risk</td>
<td>23</td>
</tr>
<tr>
<td>2</td>
<td>Safer for children/school children, mums &amp; toddlers</td>
<td>28</td>
</tr>
<tr>
<td>3</td>
<td>Deterrent/will reduce speeds, even if not to 20 mph</td>
<td>10</td>
</tr>
<tr>
<td>4</td>
<td>Reduce speeding/excessive speeds/traffic noise</td>
<td>33</td>
</tr>
<tr>
<td>5</td>
<td>Alternative to/reduce need for traffic calming/humps</td>
<td>15</td>
</tr>
<tr>
<td>6</td>
<td>Doubts whether effective without enforcement</td>
<td>10</td>
</tr>
<tr>
<td>7</td>
<td>Discourage rat running/reduce volume of traffic</td>
<td>14</td>
</tr>
<tr>
<td>8</td>
<td>Reduce pollution/emissions/better for environment</td>
<td>5</td>
</tr>
<tr>
<td>9</td>
<td>Other</td>
<td>2</td>
</tr>
</tbody>
</table>

Total oppose = 249
20 mph limit for Merton Park – can it make a difference?

As your Ward Councillors we are genuinely open minded about the introduction of a 20 mph limit in Merton Park\(^1\) – we believe it is you, our residents, who should have the final say on matters affecting your daily lives. But we were concerned that such a limited consultation might be ignored if we did not draw attention to it – we do not favour a 20 mph limit being introduced by stealth.

So we decided to distribute our own newsletter and questionnaire, to stress how important it was to respond and to make it easier for you to do so. Our decision was fully vindicated by the massive response – 480 of you sent back questionnaires. That’s six times the number of responses to the council’s statutory consultation (78), and represents approximately 22% of the households in the proposed 20 mph limit area.

The fact that so many of you chose to reply confirms our belief in Merton Park as a community that wants to determine its own future, and we are grateful for this demonstration of your commitment to the future of our neighbourhood. I have read every one of your replies and they have guided my conclusions.

The top picture shows 52% in support of a 20 mph limit in Merton Park and 48% opposed. At first sight this might suggest we are split down the middle, but closer analysis of the reasons you give reveals much common ground. Nearly everyone wants to see excessive traffic speeds reduced; where we differ is in our confidence of a 20 mph limit achieving this if it is not enforced.

A desire to reduce speeding ranks with concerns for the safety of children and the elderly as the top reasons for supporting a 20 mph limit.

\[
\begin{array}{l|c}
\text{Reason} & \% \\
\hline
\text{reduce speeding/excessive speeds/traffic noise} & 33 \\
\text{safer for children/school children/mothers with toddlers/elderly/people with limited mobility} & 28 \\
\text{safer/improved safety/reduce accident risk} & 23 \\
\end{array}
\]

However, even amongst those favouring the introduction of a 20 mph limit there are doubts it will be fully effective:

\[
\begin{array}{l|c}
\text{Doubt} & \% \\
\hline
\text{deterrent/will reduce speeds, even if not to 20 mph} & 10 \\
\text{doubt whether effective without enforcement} & 10 \\
\end{array}
\]

Some are expecting a 20 mph limit to deliver other benefits, to deter commuters from using Merton Park’s residential roads in peak hours and to obviate the need for any further traffic calming measures:

\[
\begin{array}{l|c}
\text{Benefit} & \% \\
\hline
\text{Alternative to/reduce need for traffic calming} & 15 \\
\text{Discourage rat running/reduce volume of traffic} & 14 \\
\text{Reduce pollution/emissions/better for environment} & 5 \\
\end{array}
\]

In a few cases support for a 20 mph limit is conditional upon removal of the hated ‘humps’ – but this is not part of the council’s proposal.

Opposition to a 20 mph limit centres on the fact it will not be enforced and therefore is no deterrent to speeding. In the circumstances many believe spending £500,000 on unenforceable 20 mph limits across the borough is a waste of money:

\[
\begin{array}{l|c}
\text{Doubt} & \% \\
\hline
\text{Unenforceable/police will not enforce/no deterrent} & 42 \\
\text{Waste of money/better spent elsewhere} & 30 \\
\end{array}
\]

\(^1\) South of Kingston Road and north of London Road and Martin Way
Many are concerned that no evidence has been produced to justify the need for a 20 mph limit, either in terms of current traffic speeds or accident statistics. Some believe that speeds are adequately controlled now, either by traffic calming measures or by the number of parked cars and the volume of traffic moving through the area (but this depends on where you live):

- no evidence of need i.e. accident statistics or data on traffic speeds 28%
- unnecessary/speeds not excessive because of parked cars and traffic density 26%
- speed humps/traffic calming control speeds now 21%

A minority feels the new signage required for a 20 mph limit would be unsightly. There is opposition to further traffic calming (but this may be based on a misunderstanding; no further traffic calming measures are required if a 20 mph limit is adopted, as opposed to a 20 mph zone):

- unsightly street signage/additional clutter 15%
- opposed to more traffic calming/humps 12%

In summary there are serious doubts whether a 20 mph limit will deliver what it promises, and these doubts have been reinforced by technical advice we have received. One advantage we enjoy as your Ward Councillors is working with a community that includes professionally qualified experts, and they have made us aware that the proposed 20 mph limit for Merton Park fails to comply with Department for Transport (DfT) guidelines. DfT circular 5/99 states:

‘Extreme caution should be exercised when considering making 20 mph limits using speed limit signs with no supporting speed reducing features. The weight of evidence points strongly to signed only 20 mph limits having little or no effect on traffic speeds.’

Recent guidance (circular 01/06) is more specific:

- 20 mph limits should be used for individual roads or a small number of roads
- 20 mph limits should not be implemented on roads with a strategic function (eg. Dorset Road) or on main traffic routes
- successful 20 mph zones and limits should generally be self enforcing and 85 percentile traffic speeds should be no more than 24 mph. 20 mph limits are unlikely to be complied with on roads where speeds are substantially higher than this.

The administration has been made aware of the DfT guidance, but has chosen to ignore it. The administration has also chosen to ignore police opposition to the introduction of a 20 mph limit that is not self enforcing. It should be made clear that the administration is not acting illegally in ignoring advice from the DfT and the police – but it is taking a risk with the likely effectiveness of the proposed 20 mph limit.

This is not good enough. If the 20 mph limit has no measurable impact on traffic speeds it will be a cruel deception on all those who want to see excessive speeds curbed, and a safer street scene for our children and the elderly. As your Ward Councillors we are unwilling to endorse a proposal for a 20 mph limit in name only, that fails to address the real problems of speeding traffic we witness daily on the roads in Merton Park. We repeat the requests we have already made for data on current traffic speeds and statistics on accidents where speed has been a contributory factor. And we ask for evidence that a 20 mph limit can make a significant and sustained difference to traffic speeds if introduced without additional calming measures and without police enforcement. Then we will be in a position to make a reliable recommendation to you.

Thank you again for supporting our survey so strongly.

Cllr. Peter Southgate

---

2 We have now been told that “repeater” 20mph signs would be required every 200m on lampposts and on the road to comply with the law
Purpose of report

This report details the result of the formal consultation carried out in Pelham Road area, Trinity Road area, Quick’s Road area, Cecil Road area, Merton Park Road area, Parkway area, Melrose Avenue area, Merton Hall Road area and Ashbourne Road area as part of the proposed 20mph zone / 20mph speed limit for the area. It requests that the Cabinet Member considers the representations for and against; and considers the objections against the proposed measures and the arguments for their implementation.

It recommends that the Cabinet Member agrees to proceed with the making of the Traffic Management Order for the implementation of the proposed 20mph zone / 20mph speed limit for the different area mentioned above.

Background

As part of Merton Council’s objective to improve road safety by reducing traffic speeds on the borough roads, It proposed to convert existing traffic calmed roads into either 20mph zones / 20mph speed limits. As these roads have traffic calming measures, minimum modifications are required to convert into a 20mph zone or 20mph speed limit. The existing traffic calmed roads were grouped into 18 different areas.

Formal consultation

Following the Cabinet Member approval to undertake a formal consultation and not the informal process with a view of implementing all the areas by end of March 2008, 13431 consultation documents containing a newsletter detailing the proposals and a plan of the proposals were distributed to all residents in the areas mentioned above.

Although the closing date varied between 26 September 2008 to 17 October 2008 depending on which area was consulted on, all representations received after this date, have also been included in this report. The consultation resulted in a total of XXXXX representations with majority in favour of the proposals. Most of the representations were to do with the idea of 20mph zone does not work or the proposals will increase noise and pollution.

Taking into account the idea of converting most of these roads in the borough into 20mph zones or speed limit will improve safety on these roads. Also vulnerable road users like cyclists and pedestrians will feel safe on the roads. It is therefore recommended that the Cabinet Member agree to proceed with the making of the Traffic Management Orders (TMOs) and the implementation of the proposals for the areas listed below subject to detailed design.

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.

www.merton.gov.uk