

Item No.	Classification: Open	Date: 9 July 2014	Decision taker: Cabinet Member for Regeneration Planning and Transport
Report title:		Determination of Statutory Objections Relating to the Proposal to Introduce a Borough-wide 20mph Speed Limit.	
Ward(s) or groups affected:		All	
From:		Strategic Director of Environment and Leisure	

RECOMMENDATIONS

It is recommended that the Cabinet Member for Regeneration Planning and Transport:

1. Considers the seven objections and two supporting responses made in relation to the proposed order to make Southwark a 20mph borough;
2. Reject the seven objections;
3. Instruct officers to make the relevant traffic orders; and
4. Instruct officers to write to the objectors to inform them of the council's decision with the responses set out in paragraph 17 of this report.

BACKGROUND INFORMATION

5. In September 2013, the Cabinet Member for Transport, Environment, and Recycling approved¹, subject to statutory consultation, the proposal to introduce a borough-wide 20mph speed limit.
6. In accordance with legislation² the council advertised its intention to make traffic orders in respect of the changes to speed limits on 27 February 2014. Notice was given in the London Gazette³ and local press (Southwark News). Notice was given to the following statutory consultees: London Ambulance Service, London Fire Brigade, Metropolitan Police Service, TfL Buses, Freight Transport Association and the Road Haulage Association.
7. Notice was also given to non-statutory consultees including: Transport for London, Southwark Disablement Association, Southwark Disability Forum, Southwark Cyclists, Living Streets and London Travel Watch and full details of the proposals were also made available for inspection on the council's website or in person by appointment at 160 Tooley Street.
8. The consultation period ran for the statutory period of 21 days until 20 March 2014.

¹ <http://modern.gov.southwark.gov.uk/mgDecisionDetails.aspx?Id=50001557&Opt=1>

² [The Local Authorities' Traffic Orders \(Procedure\) \(England and Wales\) Regulations 1996](#)

³ <http://www.london-gazette.co.uk/issues/60699/notices/1949099/>

9. This report makes recommendations for the determination of seven objections and the noting of two supporting responses received as a result of the statutory consultation.
10. Part 3D paragraph 23 of the Southwark Constitution sets out that determination of objections to traffic orders of a strategic nature is reserved to the Cabinet Member for Transport, Environment, and Recycling.

KEY ISSUES FOR CONSIDERATION

11. In summary, the proposed order introduces a 20 mph speed limit throughout the London Borough of Southwark and certain boundary roads with the London Boroughs of Lambeth and Lewisham, and makes exception to this restriction for certain roads forming part of the Dulwich Estate and the Transport for London road network. A map of the roads affected is attached as Appendix A.
12. Seven emails of objection and two emails of support were received in relation to the proposed orders, which are detailed in Appendices B and C respectively.

Objections to the Traffic Order

13. The Police have objected to a 20mph speed limit on any road in the London Borough of Southwark where the mean speed is above 24mph. They also object to the implementation of a 20mph limit where it is not obvious to the motorist through the look and feel of the road that the speed limit is 20mph. In addition they raised the following concerns:
 - Where mean speeds are higher than 26mph how does the council intend to ensure that motorists adhere to the new 20mph speed limit with no new engineering measures.
 - Concerns around boundary roads that are currently 30mph. The look and feel of the road will be exactly the same moving from one borough to another except for signage such as Crystal Palace Parade
 - Night time speeds when traffic is free flowing
 - The advice from the DfT is clear that 20mph limits and zones should be made to be self enforcing.
 - Introducing speed limits where traffic speeds are too high places an unrealistic expectation to enforce on the Metropolitan Police.
14. The Freight Transport Association (FTA) have objected to a blanket 20mph approach stating that this has the potential to increase costs for the logistics industry without significantly aiding road safety. They have requested that Southwark consider the following points:
 - There should be a full demonstration of the safety case for all measures proposed – it should not be done just because it is assumed it will be better. The results should be tested against other measures that might also improve safety to assess relative value for money – incorporating impacts on business.
 - Where 20mph limits are adopted they should be used in an intelligent fashion. They should be geographically targeted as much as possible to

areas of concern, and set to times of the day relevant to that concern (eg. the travel to/from school period).

- Above all, full access to the main roads – principally but not exclusively the A and B roads – must not be compromised, due to the significant economic consequences this would have.

15. Mr Toby Eckersley (Then ward councillor for Village Ward objected on the following grounds:

- i. A blanket, borough-wide, 20 mph limit is unacceptable: Localised decisions should be made.
- ii. There are streets in the south of the borough, notably boundary streets adjacent to the area I represent, where the existing 30mph limit should remain, on the grounds that the nature and configuration of the roads mean that vehicles travelling within that limit present no danger to other road users, or at least no danger sufficient to justify the costs and frustrations of a lower limit. I would cite in this context large stretches of Denmark Hill, Herne Hill, Croxted Road and Lordship Lane.
- iii. During hours of diminished traffic the reason at 2 above applies to such streets with greater force, and to additional streets.
- iv. There have been no, or inadequate, studies of the cost to businesses, public services and individuals of having to spend more time unproductively on the road by virtue of (a) 20 mph limits generally or (b) the imposition of 24-hour 20 mph limits in the types of street referred to in ground ii. above.
- v. At certain times of diminished traffic, the frustration caused to motorists by a needlessly low limit may cause more accidents, by virtue of "road rage" and the like, than adherence to a 30mph limit.
- vi. No consideration has been given to the disrepute that will be brought upon the enforcement regime by attempts to enforce a 20mph limit on the types of street referred to in ground ii. and at the times of day referred to in ground v.

16. There were a further four objections from members of the public. One objected on the grounds of the wording used. They requested that the term 'vehicle' should be changed to 'motor vehicle'. The others stated concerns that cars were not made to be driven at 20mph, reducing the speed limit causes nothing but frustration and that 20mph was too slow.

Consideration of Objections Raised

17. The objections to the proposed traffic order are set out below together with a proposed response:

Objection 1

Where mean speeds are higher than 26mph how does the council intend to ensure that motorists adhere to the new 20mph speed limit with no new engineering measures.

Response

Of the 137 roads monitored in Southwark only 11 (8%) had average speeds greater than 26mph. In Portsmouth (the first urban area to impose a wide area limit) there was an average decrease of 1.3mph on the majority of their roads and on a number of roads where average speeds were greater than 24mph decreases of over 7mph were achieved.

It is planned to run a comprehensive communication and publicity campaign to raise awareness and encourage compliance.

All roads will be monitored within 12 months of implementation following which a targeted programme of physical intervention will be introduced in locations of genuine need because of poor compliance etc.

Objection 2

There are streets in the south of the borough, notably boundary streets adjacent to the area I represent, where the existing 30mph limit should remain, on the grounds that the nature and configuration of the roads mean that vehicles travelling within that limit present no danger to other road users, or at least no danger sufficient to justify the costs and frustrations of a lower limit. I would cite in this context large stretches of Denmark Hill, Herne Hill, Croxted Road and Lordship Lane.

Response

Both Lambeth and Lewisham have given their approval for all the boundary roads to be made 20mph. Lambeth are currently working towards becoming a 20mph borough and Lewisham have no objection to the principle.

Denmark Hill, Herne Hill, Croxted Road and Lordship Lane have average speeds of 29.7mph, 26.2mph, 27.8mph and 23.8mph respectively.

Herne Hill aside, Croxted Road, Denmark Hill and Lordship Lane have relatively high collision rates, a number of which are speed related, which would suggest that these roads would benefit from speed reduction on safety grounds.

Objection 3

Concerns over night time speeds when traffic is free flowing. At certain times of diminished traffic, the frustration caused to motorists by a needlessly low limit may cause more accidents, by virtue of "road rage" and the like, than adherence to a 30mph limit.

Response

It is recognised that night time speeds could be an issue and this is something that will be monitored.

Similar schemes in Portsmouth and Bristol resulted in an average decrease of speed of 1 to 2mph therefore it is not believed that this would have a significant impact so as to cause 'road rage'.

Research shows, however, that on urban roads with low traffic speeds any 1 mph reduction in average speed can reduce the collision frequency by around 6% (Taylor, Lynam and Baruya (2000) so even a modest reduction of 1 mph average speed could reduce the number of collisions by 56 collisions a year in Southwark (based on 2012 data). There is also clear evidence confirming the greater chance of survival of pedestrians at lower speeds.

Objection 4

Introducing speed limits where traffic speeds are too high places an unrealistic expectation to enforce on the Metropolitan Police.

No consideration has been given to the disrepute that will be brought upon the enforcement regime by attempts to enforce a 20mph limit.

Response

It is understood that Police resources for speed enforcement are limited as they need to prioritise other issues, such as antisocial behaviour and violent crimes and therefore, to make the most of resources available for speed enforcement, the Police prioritise roads with high collision rates.

Officers continue to have discussions with the Police about future speed enforcement in Southwark and encourage them to continue enforcement at collision hotspots, including 20 mph streets where necessary. The authority is not relying on the Police increasing resources for speed enforcement for the scheme to succeed, although this would be welcomed.

The Association of Chief Police Officers Speed Enforcement Policy Guidelines state:

“The police service supports all appropriate speed limits where:

- (i) there is a proven need; (ii) the limit is clear, looking and feeling like the limit; and
- (iii) motorists have the ability to apply.”

Objection 5

Concerns around boundary roads that are currently 30mph. The look and feel of the road will be exactly the same moving from one borough to another except for signage such as Crystal Palace Parade

Response

Both Lambeth and Lewisham have given their approval for all the boundary roads to be made 20mph. Lambeth are currently working towards becoming a 20mph borough and Lewisham are looking to make a decision shortly. Following discussions with Bromley it has been decided not to implement a 20mph limit on Crystal Palace Parade.

All roads will be signed in accordance with DfT guidelines.

Objection 6

The advice from the DfT is clear that 20mph limits and zones should be made to be self enforcing.

Response

DfT Circular 01/2013 para 85 only states that 'Successful 20mph zones and 20mph limits are generally self-enforcing.' There is no strict requirement that 20mph limits and zones should be self enforcing.

Objection 7

A blanket 20mph approach has the potential to increase costs for the logistics industry without significantly aiding road safety.

There have been no, or inadequate, studies of the cost to businesses, public services and individuals of having to spend more time unproductively on the road by virtue of (a) 20 mph limits generally or (b) the imposition of 24-hour 20 mph limits.

Response

There is evidence to suggest that that a borough-wide 20mph signage only approach is a cost effective method to reduce collisions, encourage more sustainable forms of travel such as walking and cycling and help improve air quality.

Research shows that on urban roads with low traffic speeds any 1 mph reduction in average speed can reduce the collision frequency by around 6% (Taylor, Lynam and Baruya (2000) so even a modest reduction of 1 mph average speed could reduce the number of collisions by 56 collisions a year in Southwark (based on 2012 data). There is also clear evidence confirming the greater chance of survival of pedestrians at lower speeds.

Similar schemes in Portsmouth and Bristol resulted in an average decrease of speed of 1 to 2mph therefore it is not believed that this would have a significant impact on business. That said, Southwark Council would be happy to work with the Freight Transport Association into the effects of a blanket 20mph approach for the logistics industry.

In Bristol cycling and walking increased by over 12% following implementation.

Objection 8

The term 'vehicle' used within the TMO should be changed to 'motor vehicle'

It is unreasonable that non-motorised vehicles should be subject to the traffic order on the following two grounds:

- 1) It creates an inconsistency between national legislation and local traffic management rules. The relevant statute (Road Traffic Regulation Act 1984, sections 81 & 89) governing national speed limits specifically refers to "motor vehicles". If different wording is used in Southwark to that used in national legislation, this will create confusion and uncertainty amongst the public.**

2) It is not realistic to expect those in control of all non-motorised vehicles to know their speed accurately, and therefore it is unreasonable for them to be subject to maximum speed limits. For example, a cyclist travelling downhill could easily but unknowingly exceed 20 mph even without pedalling and it would be unjust for them to receive punishment for doing so.

Response

The Road Traffic Regulation Act 1984 does indeed refer to 'motor vehicles' however, since 1984 cycling as a modal share has grown substantially and the Council receives a number of complaints from residents particularly pedestrians about the excessive speed of cyclists. Therefore it would be inappropriate to treat cyclists differently to any other form of traffic and effectively tie the hands of police when it comes to speed enforcement.

Objection 9

Concerns that cars were not made to be driven at 20mph.

Response

There is no evidence to suggest that cars cannot be driven at 20mph. In fact research has shown that cars driven at 20mph will not only help reduce collisions and encourage more walking and cycling but will also reduce air pollution.

Objection 10.

Reducing the speed limit causes nothing but frustration and that 20mph was too slow.

Response

There is evidence to suggest that a borough-wide 20mph signage only approach is a cost effective method to reduce collisions, encourage more sustainable forms of travel such as walking and cycling and help improve air quality. Research shows that on urban roads with low traffic speeds any 1 mph reduction in average speed can reduce the collision frequency by around 6% (Taylor, Lynam and Baruya (2000) so even a modest reduction of 1 mph average speed could reduce the number of collisions by 56 collisions a year in Southwark (based on 2012 data). There is also clear evidence confirming the greater chance of survival of pedestrians at lower speeds.

Supportive Responses in support of the Traffic Order

18. Two responses were received in support of the traffic order. The first was from Southwark Living Streets group and the other from a member of the public.

Policy implications

19. The recommendations contained within this report are consistent with the policies of the Transport Plan 2011, particularly:
 - Policy 2.3 - Promote and encourage sustainable travel choices in the borough.
 - Policy 4.2 - Create places that people can enjoy.

- Policy 4.5 - Enhance quality of life through the built and natural environment.
- Policy 5.1 - Improve safety on our roads and to help make all modes of transport safer.
- Policy 5.4 - Seek to reduce vehicle speeds and educate and enforce against those who break speed limits.
- Policy 5.5 - We will make Southwark a 20mph borough.
- Policy 5.6 - We will seek to create conditions where our roads are safe.

Community impact statement / Equalities

20. The policies within the Transport Plan which underpin this report have been subject to an Equality Impact Assessment.
21. The recommendations are borough wide and will therefore affect all those people that live, work and travel in Southwark.
22. The important benefits of 20mph Schemes include quality of life, community benefits and encouragement of healthier and more sustainable transport modes such as walking and cycling. Walking and cycling can make a very positive contribution to improving health and tackling obesity, improving accessibility and tackling congestion, reducing carbon emissions and improving the local environment.
23. The council believes the scheme contributes towards the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway.

Resource implications

24. This report is to determine statutory objections made in relation to a proposed traffic order.
25. There are no additional costs as a result of these recommendations. The cost of implementing the 20 mph limit will be funded from capital resources and the details of the proposal were reported in a separate report ("Making Southwark a 20 mph Borough") to the cabinet member in October 2013.

Consultation

26. Statutory consultation has been carried out as detailed in paragraphs 8 to 13 of this report.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Legal Services

27. The Cabinet Member for Regeneration Planning and Transport is being asked to consider the objections that have been made and to authorise officers to make the traffic order in relation to a borough-wide 20mph speed limit.
28. In coming to a decision on whether to make a traffic order, Section 122 of the Road Traffic Regulation Act 1984 provides that the council must exercise its functions, so far as practical having regard to the matters set out below, to

secure the expeditious, convenient and safe movement of vehicular and other traffic, including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway.

29. The matters referred above are: the desirability of securing and maintaining reasonable access to premises; the effect on the amenities of any locality affected; the national air quality strategy; the important of facilitating the passage of public service vehicles and any other matters that appear relevant.
30. The procedure for making a traffic order is set out in the Local Authorities Traffic Orders (Procedure) (England and Wales) Regulations 1996, which contains requirements in relation to consultation and publication.
31. The Equality Act 2010 introduced the public sector equality duty, which merged existing race, sex and disability duties and extended them to include other protected characteristics; namely age, gender reassignment, pregnancy and maternity, religion and belief and sex and sexual orientation, including marriage and civil partnership. In summary those subject to the equality duty, which includes the council, must in the exercise of their functions: (i) have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; and (ii) foster good relations between people who share a protected characteristic and those who do not.
32. The Human Rights Act 1998 imposed a duty on the council as a public authority to apply the European Convention on Human Rights; as a result the council must not act in a way which is incompatible with these rights. The most important rights for planning and highways purposes are Article 8 (respect for homes); Article 6 (natural justice) and Article 1 of the First Protocol (peaceful enjoyment of property).
33. The implementation of a Borough wide 20mph speed limit is not anticipated to have a negative effect on equalities or human rights.
34. The Southwark Constitution gives the portfolio holder for Regeneration Planning and Transport responsibility for (amongst other things) traffic management and road safety. Part 3D of the constitution provides that the responsibility for determining objections to traffic orders falls to the individual Cabinet Member. It is therefore appropriate for the Cabinet Member for Regeneration Planning and Transport to consider the objections as set out in this report.

Strategic director of finance and corporate services (Env/ET/020514)

35. The strategic director of finance and corporate services notes the resource implications contained within the report. Officer time to effect the recommendation will also be contained within existing budgeted resources.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
IDM report - proposal to introduce a borough-wide 20mph speed limit	Southwark Council Environment Public Realm Network Development 160 Tooley Street London SE1 2QH Online: http://modern.gov.southwark.gov.uk/ieDecisionDetails.aspx?ID=3794	Eamon Doran (020 7525 0513)
Transport Plan 2011	Environment Public Realm Network Development 160 Tooley Street London SE1 2QH Online: http://www.southwark.gov.uk/info/200107/transport_policy/1947/southwark_transport_plan_2011	Eamon Doran (020 7525 0513)

APPENDICES

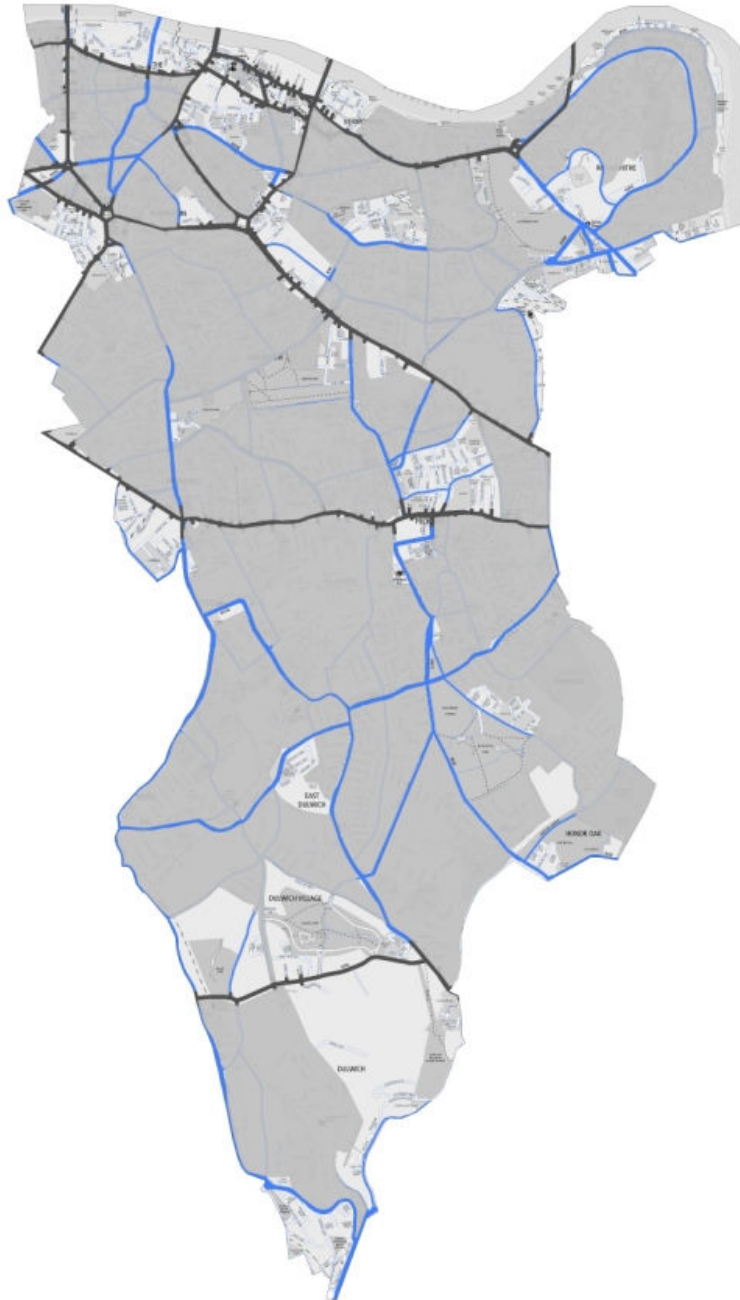
No.	Title
Appendix A	Map of proposed 20mph borough-wide scheme
Appendix B	Objections received
Appendix C	Responses in support of 20mph borough-wide scheme

AUDIT TRAIL

Lead Officer	Deborah Collins, Strategic Director Environment and Leisure	
Report Author	Des Waters, Head of Public Realm, Environment and Leisure	
Version	Final	
Dated	June 2014	
Key Decision?	Yes	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Director of Legal Services	Yes	Yes
Strategic Director of Finance and Corporate Services	Yes	Yes
Cabinet Member	Yes	Yes
Date final report sent to Constitutional Team	26 June 2014	

APPENDIX A

LONDON BOROUGH OF SOUTHWARK Borough-wide 20mph speed limit



LEGEND

ALL EXISTING 30mph LIMIT ROADS PROPOSED TO CHANGE TO 20mph LIMIT

- A road / Strategic Road Network
- B road
- C road
- Minor road

AREAS EXCLUDED FROM PROPOSED 20MPH LIMIT

- Area with existing 20mph limit (no changes proposed)
- Transport for London Road Network (TLRN) excluded from 20mph proposals

This map is based on Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. (0)100019252) 2014

APPENDIX B

No.	Objections
1	<p>Thank you for sending the average speeds through for the 130 roads that you have surveyed. Firstly, it would be helpful if you could tell me how many other roads in the borough currently have a 30mph limit which will be changing to a 20mph limit?</p> <p>I am concerned at some of the speeds shown in the survey. I understand that the London Borough of Southwark will be using signage alone to enforce the new borough wide 20mph speed limit. In the consultation document it mentions "we are not relying on the Police increasing resources for the scheme to succeed." It also mentions that it is recognised that signage alone is likely to decrease speeds by only one to two mph. In the twelve roads surveyed where the mean speeds are higher than 26mph how does the council intend to ensure that motorists adhere to the new 20mph speed limit with no new engineering measures and assuming that the signage does indeed drop the speeds by 2mph?</p> <p>Using signage alone will not create a different look and feel to the roads. I am particularly concerned about boundary roads which have a 30mph speed limit. The look and feel of the road will be exactly the same as a driver moves from one borough to another except for the signage.</p> <p>Crystal Palace Parade is one such example. This is not a small residential street. It is a major route which is four lanes wide in places. It has bus lanes and bus stops on both sides of the road which often block a driver's view of the signage. It neither looks nor feels as though it has a 20mph speed limit. The average speed is 25.1mph which is too high to implement a 20mph limit. This road regularly has heavy traffic jams and the average speed from the speed survey will not reflect the speeds at this location when the traffic is free flowing. Drivers will move from the 30mph limit in the surrounding boroughs into this road and not realise from the look and feel of the road, that they are in a road with a 20mph limit.</p> <p>I would like to look at the data in more detail as I am concerned about night time speeds. I did query this in my e mail dated 3rd March requesting information. However the end of the consultation period is in only two days time and I have only just received the average speed information. As mentioned the average speeds for all roads do not reflect speeds when the traffic is free flowing. Often the speeds are kept artificially low in the day due to weight of traffic and they rise significantly at night. What measures do you intend to take if higher night time speeds prove to be a problem?</p> <p>From the data that you have sent me there are thirty three roads that have a mean speed of over 24mph. DfT Circular "Setting local speed limits" dated Jan 2013, refers to the need to ensure that existing traffic speeds are not too high. Paragraph 95 states "Research into signed only 20mph limits show they only lead to small reductions in traffic speeds. Signed only 20mph speed limits are therefore most appropriate for areas where vehicle speeds are already low." Some of the roads measured have high average speed limits of 29 and even 30mph. This suggests that the eighty-fifth percentile is probably well over 30mph. These roads probably already have a problem with motorists exceeding the 30mph limit, although I can't confirm this having not seen the more detailed data. It would be very inappropriate to introduce a lower 20mph speed limit at these locations without first using engineering measures to slow vehicles.</p> <p>Introducing speed limits where traffic speeds are too high places an unrealistic</p>

	<p>expectation to enforce on the Metropolitan Police. Whilst any reduction in speed is of benefit, the number of offenders will increase significantly in the roads which presently have average speeds of over 24mph, placing an expectation on the Police for enforcement which we do not have the extra resources to fulfill.</p> <p>The Metropolitan Police objects to a 20mph speed limit on any road in the London Borough of Southwark where the mean speed is above 24mph. We also object to the implementation of the 20mph limit where it is not obvious to the motorist through the look and feel of the road that the speed limit is 20mph. From the information that I have been given, the roads that have been surveyed that have a mean speed of over 24mph are as follows: Barry Road, Borough Road, Brenchley Gardens, Camberwell Road, Champion Park, Commercial Way, Croxted Road, Crystal Palace Parade, Denmark Hill, Dulwich Wood Park, East Dulwich Grove, Garden Row, Ilderton Road, Lambeth Road, Lordship Lane, Lower Road, Oswin Street, Peckham Rye, Plough Way, Redriff Road, Salter Road, South Croxted Road, Southwark Park Road, Sydenham Hill, Trafalgar Avenue, Village Way, Waterloo Road, Bush Road, Denmark Road, Gipsy Hill, Herne Hill, Honor Oak Park, Kennington Park Road.</p> <p>I am particularly concerned about the speeds in Brenchley Gardens, Denmark Hill, Dulwich Wood Park, Redriff Road and Salter Road.</p> <p>The Metropolitan Police Service is committed to making the roads even safer and reducing the numbers of people killed and seriously injured. Speed enforcement is expensive; it is both time and resource intensive and competes with other important policing issues of equal public concern. Enforcement is mainly reactive and should not be seen as a preventative measure to achieve vehicle speeds. This will be achieved by public support and compliance by the majority. The DfT's circular 01/2013 states that to achieve compliance there should be no expectation on the police to provide additional enforcement beyond routine activity unless agreed. Pre-planned targeted enforcement of 20mph speed limits will be intelligence led. It will only be carried out in exceptional circumstances; where the speed limit is legally and clearly signed, looks and feels like a 20 mph limit and there is a collision problem and/or a particular risk to vulnerable road users and evidence of persistent high harm speeding motorists. The advice from the DfT is clear, that 20 mph Limits and Zones should be made to be self enforcing. If it doesn't look like or feel like a 20mph limit then there will be large scale offending and routine prosecution will be seen as inappropriate and unfair. It is for local authorities to appropriately sign and if necessary engineer a limit, leaving the police to target the persistent and deliberate offender, together achieving the very highest level of compliance and safety for road users.</p> <p>Regards,</p> <p>Catherine Linney</p> <p>Metropolitan Police Traffic Management Unit Catford Traffic Garage 0208 284 5937 07770 856889</p>
2	<p>About FTA</p> <p>The Freight Transport Association (FTA) is one of Britain's largest trade associations, and uniquely provides a voice for the whole of the UK's logistics sector. Its role, on behalf of over 14,000 members, is to enhance the safety,</p>

efficiency and sustainability of freight movement across the supply chain, regardless of transport mode. FTA members operate over 200,000 goods vehicles - almost half the UK fleet - and some one million liveried vans. In addition, they consign over 90 per cent of the freight moved by rail and over 70 per cent of sea and air freight. FTA works with its members to influence transport policy and decisions taken at local, national and European level to ensure they recognise the needs of industry's supply chains.

FTA Response

FTA welcomes the opportunity to respond to Southwark's proposals for a 20mph borough-wide speed limit. Local authorities are increasingly considering reducing speed limits in built-up areas. FTA believes that whilst such schemes have a useful part to play in increasing road safety, they should not be applied in a simplistic or blanket fashion.

The standard limit for urban roads is 30mph. In recent years Councils, including Southwark have frequently introduced lower 20mph limits in accident black spots or around sensitive locations such as schools. This is an entirely sensible action and one that is welcomed by the logistics industry. We wish to see our roads become safer places to be and such limits are supported as an effective and proportionate response.

However, the Association is concerned that a blanket approach has the potential to increase cost for the logistics industry without significantly aiding road safety. Councils so far implementing this arrangement have generally admitted that it will in reality be unenforced. As well as therefore not reducing speeds amongst a large section of the driving community, this could lead to greater speed differentials between those who do obey the rules and those who do not – counterbalancing to a large extent the expected gains in safety.

We fear that making the rules apply everywhere will reduce private drivers' willingness to obey the rules anywhere – reducing compliance and good driving in current safety hotspots. The targeted 20mph approach serves as a clearly understood warning to take extra care in an area, which a blanket approach would eliminate.

To the extent that these changes do slow traffic speeds across the area, costs will increase for the logistics industry. Extended delivery times increase staff costs and reduce the productivity of each vehicle. It should also be noted that hgv's are not generally designed to cruise optimally at 20mph and would be inefficient at these speeds. So the lower limit would not provide benefits in terms of fuel use or, importantly, local emissions. The consequential change in the business model will then translate into increased costs and reduced service for the local businesses that depend on freight – shops, industrial sites, offices and more. It should be remembered that every business, and indeed every resident, in a city is reliant on freight.

A blanket approach slows traffic not just in every location but also at every time – there are many roads where there will be few vulnerable road users around in the middle of the night and it therefore seems an unnecessarily regulatory approach to have such low speed limits in place at that time.

Next steps

FTA asks Southwark to consider the following points:

1. There should be a full demonstration of the safety case for all measures proposed – it should not be done just because it is assumed it will be better.

	<p>The results should be tested against other measures that might also improve safety to assess relative value for money – incorporating impacts on business.</p> <ol style="list-style-type: none"> 2. Where 20mph limits are adopted they should be used in an intelligent fashion. They should be geographically targeted as much as possible to areas of concern, and set to times of the day relevant to that concern (eg the travel to/from school period). 3. Above all, full access to the main roads – principally but not exclusively the A and B roads – must not be compromised, due to the significant economic consequences this would have. <p>Prepared by: Natalie Chapman Head of Policy – London Freight Transport Association 13 March 2014</p>
3	<p>From: Eckersley, Toby</p> <p>Sent: 20 March 2014 12:06</p> <p>To: traffic orders</p> <p>Subject: [TMO1314-034] Introduction of borough-wide 20 m.p.h. speed limit</p> <p>from Cllr Toby Eckersley</p> <p>This is an objection to the captioned proposed Traffic Order:</p> <p>The grounds of the objection are:</p> <ol style="list-style-type: none"> 1 A blanket, borough-wide, 20 mph limit is unacceptable: localised decisions should be made. 2 There are streets in the south of the borough, notably boundary streets adjacent to the area I represent, where the existing 30mph limit should remain, on the grounds that the nature and configuration of the roads mean that vehicles travelling within that limit present no danger to other road users, or at least no danger sufficient to justify the costs and frustrations of a lower limit. I would cite in this context large stretches of Denmark Hill, Herne Hill, Croxted Rd and Lordship Lane. 3 During hours of diminished traffic the reason at 2 above applies to such streets with greater force , and to additional streets. 4 There have been no, or inadequate, studies of the cost to businesses, public services and individuals of having to spend more time unproductively on the road by virtue of (a) 20 mph limits generally or (b) the imposition of 24-hour 20 mph limits in the types of street referred to in ground 2 above. 5 At certain times of diminished traffic, the frustration caused to motorists by a needlessly low limit may cause more accidents, by virtue of "road rage" and the like, than adherence to a 30mph limit.

	<p>6 No consideration has been given to the disrepute that will be brought upon the enforcement regime by attempts to enforce a 20mph limit on the types of street referred to in ground 2, and at the times of day referred to in ground 5.</p> <p>If the decision-maker is minded to proceed with the order, I look forward to sight of rebuttal of the above grounds.</p> <p>Cllr Toby Eckersley</p> <p>Village ward</p>
4	<p>Sent: 18 March 2014 18:56 To: traffic orders Subject: Re: PRP/PD/TMO1314-034 (Introduction of borough-wide 20 m.p.h. speed limit)</p> <p>Dear Sir/Madam,</p> <p>Re: PRP/PD/TMO1314-034</p> <p>I would like to object to the wording of the draft Traffic Management Order included as part of the proposal to introduce a borough-wide 20 m.p.h. speed limit.</p> <p>Specifically, I am concerned by the wording in Section 2.1 of the traffic order where I maintain that the term "vehicle" should be replaced by "motor vehicle":</p> <p>"2.1 No person shall cause or permit any vehicle to proceed at a speed in excess of 20 miles per hour in any road, street or part thereof as lies within the London Borough of Southwark."</p> <p>It is unreasonable that non-motorised vehicles should be subject to the traffic order on the following two grounds:</p> <p>1) It creates an inconsistency between national legislation and local traffic management rules. The relevant statute (Road Traffic Regulation Act 1984, sections 81 & 89) governing national speed limits specifically refers to "motor vehicles". If different wording is used in Southwark to that used in national legislation, this will create confusion and uncertainty amongst the public.</p> <p>2) It is not realistic to expect those in control of all non-motorised vehicles to know their speed accurately, and therefore it is unreasonable for them to be subject to maximum speed limits. For example, a cyclist travelling downhill could easily but unknowingly exceed 20 mph even without pedalling and it would be unjust for them to receive punishment for doing so.</p> <p>I hope that you will agree that the change of wording is both reasonable and desirable and the draft Traffic Management Order will be amended accordingly.</p> <p>Yours faithfully,</p>

5	<p>Regarding this proposal, not a good idea. I agree small side streets need this but major roads it's a definite no no. This dumbing down attitude is making pedestrians even more irresponsible than they are now. With a mobile/iPod plugged into their ears they walk onto zebra crossings without really looking assuming any vehicle can stop on a sixpence. None of them seem to know the Highway Code, this used to be taught by the police at schools; it seems now that the police have abdicated any responsibility here.</p> <p>Always the motorist is attacked, but we are also pedestrians and being motorist as well we are the most aware of the dangers.</p> <p>Reducing does nothing but cause frustration, we pay the most taxes and get clobbered time after time: so no I reject this proposal.</p>
6	<p>20mph will not help anybody. Cars are not manufactured to be driven at these speeds - even 40mph is very safe.</p> <p>Bad drivers will always be bad drivers. They'll ignore the 20mph limit. Outside schools during drop off/pick up times, or outside play parks, yes. Other than that, I wonder what you are trying to achieve. Don't give me the argument about people being knocked down at 20mph being able to survive their injuries.</p> <p>What were they doing in the road to begin with?</p> <p>Stop creating little jobs for yourselves and find something else to do.</p> <p>Regards,</p>
7	<p>Most main roads can support a 30 mph speed limit not that it can ever be reached because of the traffic and distant between traffic lights. Most smaller roads have those awful speed bumps that ruin a cars tracking set up and tyres and suspension, so 30 mph is never achieved anyway. The roads are full of potholes and in such a bad state of repair that if you travel at 30 mph you risk breaking something on your vehicle anyway.</p> <p>20 mph is just a little to slow to have vehicles travelling around a city like ours, I think 30 mph is adequate please leave it alone and concentrate on other more pressing issues like freeing up bus lanes that are directed out of the centre of the city allowing all vehicle to use them this would ease traffic. (JAMAICA ROAD EASTBOUND BUS LANES ESPECIALLY).</p> <p>Thank You,</p>

APPENDIX C

	Responses in support of borough-wide 20mph speed limit
1	<p>From: jeremy@southwarklivingstreets.org.uk [mailto:jeremy@southwarklivingstreets.org.uk] On Behalf Of Jeremy Leach Sent: 10 March 2014 12:44 To: Herbert, Richard Subject: Re: [LB Southwark - traffic orders] Introduction of borough-wide 20 m.p.h. speed limit</p> <p>Dear Richard,</p> <p>Southwark Living Streets is totally supportive of these measures.</p> <p>Best wishes - Jeremy</p>
2	<p>-----Original Message-----</p> <p>Sent: 03 March 2014 11:10 To: traffic orders Subject: Proposed Borough-wide 20 M.P.H. Speed Limit</p> <p>Hello,</p> <p>I just wanted to express my support for this proposed speed limit. It would make all the difference on the small, residential roads in Southwark.</p> <p>Thank you,</p>