

London Borough of Lewisham – Sustainable Development Select Committee

Introducing a borough-wide 20 mph speed limit – Submission by 20's Plenty For Us

Introduction

We would like to thank the London Borough of Lewisham for asking 20's Plenty For Us to submit comments about the opportunity that 20mph speed limits offer. 20's Plenty For Us is a small community-based organisation with almost 250 branches across the UK which campaigns for slower speeds in our cities, towns and villages and 20mph speed limits in particular and a fairer balance between people and motor vehicles. We would like to provide some information in relation to the following issues that have been raised about 20mph limits in the scoping paper:

- The potential benefits in introducing the 20 mph limit in the borough
- The potential limitations in introducing the 20 mph limit (such as TfL controlled roads)
- How the new speed limit will be enforced
- How local people will be informed about the 20 mph limit
- The costs in introducing a new 20 mph limit
- The experiences of other London Boroughs in implementing the 20 mph limit

Overall we would note that the principle task in Lewisham just as across the whole of the capital is to make our main roads safer. Lewisham along with many other boroughs has made great strides in reducing casualties on its more residential roads but 74% of all road casualties across London and 77% of casualties in Lewisham occur on roads that are classified as A or B roads.

1) Potential Benefits

There are 3 principal areas in which slower speeds and 20mph speed limits can be of value:

- **Casualty Reduction.** Reducing urban speeds to a maximum of 20mph is widely recognised as reducing casualties by almost a half. The definitive study in 2009 on the impact of 399 20mph zones across London over a 20 year period by the London School of Hygiene & Tropical Medicine¹ found that they delivered a 42% fall in levels of road casualties. Bringing in 20mph speed limits alone is able to deliver around a minimum 20% reduction in road casualties with declines in casualties of 22% in Portsmouth, 25% in Warrington, 56% in Newcastle and 46% in the County of Lancashire when 20mph speed limits (alone) were introduced.
- **Public Health.** 20mph limits are associated with higher levels of walking and cycling and active travel more generally. Research into the impact of 20mph zones² has found that levels of walking and cycling rose significantly when vehicle speeds are reduced. More recently, research which accompanied the introduction of 20mph speed limits in Bristol in 2009 identified a mean of a 23% increase in levels of walking and a 21% increase in cycling.
- **Improved Quality of Life.** 20mph speed limits deliver (directly and indirectly) lower levels of air pollution and lower levels of noise pollution and a street environment that is less intimidating for those who walk and cycle.

¹ <http://www.bmj.com/content/339/bmj.b4469>

² <http://www.panh.ch/hepaeurope/materials/HEPA%20Walking%20and%20Cycling%20Strategy%20.pdf>

The good news is that potential dis-benefits from slower speeds such as longer journey times or increased levels of air pollution have not been found to be significant.

Air Pollution. The most significant study into the relationship between 20mph and air quality appears to have been done for the City of London in its investigation about whether to adopt a 20mph speed limit. The City commissioned a study by Imperial College³ specifically to look at the “estimated impacts on vehicle emissions of a 20mph speed restriction in central London” and stated in their conclusions (on page 7) that “The study concluded that it would be incorrect to assume a 20mph speed restriction would be detrimental to ambient local air quality, as the effects on vehicle emissions are mixed”.

Impact of Journey Times. In an urban environment a 20mph limit has a negligible impact on journey times and does not significantly alter trip lengths or inconvenience drivers. It is the number of and duration of the stops on a journey that tend to dictate the length of a journey in an urban setting and constant 30mph is rare due to bends, junctions etc. There are two good short video examples of this at:

<https://www.youtube.com/watch?v=tSU6gMpSWww>

https://www.youtube.com/watch?v=pW_fyuybDYw

In addition, rather than being negative to the local economy, slower speeds encourage people to use their local shops and services more frequently (as walking and cycling become relatively more attractive as modes of travel). Those who walk to shops spend the largest amount overall as they visit local retailers the most frequently (and this far outweighs a slightly lower spend per visit).

2) Potential limitations

- A big change in the past 2 years has been the position of 20mph on the TfL managed TLRN. The rise in (cycling and pedestrian) casualties in 2011 coupled with the work of the Mayor’s Roads Task Force and its creation of typologies that lean a more towards “place” and less towards “movement” have led to a greater acceptance of the idea of 20mph on parts of the TLRN.
- TfL’s policy on 20mph has changed significantly in relation to both the support that they are prepared to give to boroughs who are wishing to implement 20mph limits and their preparedness to introduce 20mph limits on the TLRN.
- There are a number of recent policy papers which now specifically support 20mph. These include:
 - TfL/GLA Safer Streets for London Road Safety Action Plan⁴
 - Mayor of London Vision from Cycling⁵ from March 2013
 - Pedestrian Safety Action Plan for London⁶ from the GLA and TfL (adopted in July 2014)
 - TfL/GLA Cycle Safety Action Plan⁷ published in November 2014
 - The April 2014 report on pedestrian safety from the GLA Transport Committee entitled *Feet First – Improving Pedestrian Safety in London*⁸.

³ <http://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Documents/speed-restriction-air-quality-report-2013-for-web.pdf>

⁴ <https://www.tfl.gov.uk/cdn/static/cms/documents/safe-streets-for-london.pdf>

⁵ <http://www.london.gov.uk/sites/default/files/Cycling%20Vision%20GLA%20template%20FINAL.pdf>

⁶ <http://www.tfl.gov.uk/cdn/static/cms/documents/pedestrian-safety-action-plan.pdf>

⁷ <http://www.tfl.gov.uk/cdn/static/cms/documents/cycle-safety-action-plan.pdf>

- TfL are, therefore, much more open to looking at 20mph on the Red Routes especially when they know that boroughs are keen to introduce 20mph limits on their own network. They are encouraging boroughs to commence the dialogue with them at an early stage to ensure that 20mph limits on borough roads can be implemented at the same time as on the appropriate TLRN routes (exactly as occurred in the City of London with the trials of 20mph on 2 of the City's 3 TLRN routes which began in July 2014). Their criteria will be that the road should be appropriate for the introduction of a 20mph limit (eg excluding dual carriageway roads). The example below is from Camberwell town centre where a 20mph limit was introduced on the A202 in summer 2014.



3) Enforcement

This is probably the issue that is most discussed in relation to the implementation of 20mph limits. A number of factors which are described more fully below have led to enforcement now having far more priority than it has had in recent years.

A. Development of ACPO Policy. It is now the clear policy of the police to enforce 20mph limits following the change of guidance from Association of Chief Police Officers (ACPO) in October 2013 (<http://www.acpo.presscentre.com/Press-Releases/ACPO-marks-refreshing-of-speed-enforcement-guidance-26e.aspx>)

"The principal alteration to our guidance relates to areas under a 20 mile-per-hour limit. Enforcement will be considered in all clearly posted limits, but limits are only one element of speed management and local speed limits should not be set in isolation. Deliberate high harm offenders will always be targeted and they will be prosecuted."

B. Enforcement in London. Enforcement of 20mph limits is occurring in London. Since the City of London adopted their authority-wide 20mph limit in July 2014, the City of London Police have been issuing fixed penalty notices. The City of London Police is, however, a different force from the Metropolitan Police. In Islington where all borough roads became 20mph in January 2013, compliance with the 20mph limit was undertaken initially through "advice" by police but this position has changed since October 7th 2014, when the Metropolitan Police in Islington began to fine drivers for exceeding the 20mph limit.

http://www.islingtongazette.co.uk/news/drivers_breaking_islington_s_20mph_limit_to_be_fined_for_the_first_time_tomorrow_1_3796635

This combination of enforcement and advice to encourage compliance (see Community Roadwatch below) is now being undertaken regularly and systematically in Islington⁹.

⁸ <http://www.london.gov.uk/mayor-assembly/london-assembly/publications/feet-first-improving-pedestrian-safety-in-london>

⁹ http://www.islingtongazette.co.uk/news/crime-court/police_and_public_to_join_forces_and_enforce_islington_s_20mph_limit_in_uk_s_first_community_speed_watch_1_3863589

C. Road & Transport Policing Command. The Metropolitan Police has set up the 2,300 officer strong Road & Transport Policing Command and this became operational from 1st December 2014. At the Road Danger Reduction & Enforcement Conference of 1st November 2014, Sergeant Simon Castle confirmed Metropolitan Police support for enforcement of 20mph limits and the role that the newly established command would play in that.

D. Enforcement – Local Level. The ward panel has the capacity to set policing priorities and enforcement of speed limits can be a priority. The tweets of the local Sergeant in the Caledonian ward from around September 23rd illustrate the role of the ward team.
<https://twitter.com/MPSCallySgt>

E. Community Roadwatch. It is no longer the police alone who play a role. The newly established Community Roadwatch in London is empowering local communities to play their part in encouraging compliance with training and support from the police. TfL is now trialling an initial phase of Community Roadwatch in Southwark, Islington and Lambeth with a planned roll out across London boroughs by the end of 2015.
<https://www.tfl.gov.uk/corporate/safety-and-security/road-safety/community-roadwatch>

4) Informing Local People

- This is a key part of getting people to buy into the idea of 20mph limits and ensuring that they feel that the new limit is being introduced to benefit them as a resident rather than as a restriction on their freedom.
- 20's Plenty suggests that, as well as the costs of installing signage, around 10% of the budget is put aside for communication. A good summary of the kinds of soft measures that can support the introduction of 20mph limits and their impact is available in the Delivering Soft Measures to Support Signs-only 20mph Limits¹⁰ report from June 2012.
- Really good work was done in Liverpool to accompany the introduction of the 20mph limit there which included joint promotional work between young footballers from the Everton and Liverpool football clubs (!) thus emphasising the value of 20mph limits to younger drivers. Examples of this work can be seen at:
 - <http://www.baytvliverpool.com/vod/?vid=CBV5135c60108b59>
 - <http://www.the20effect.com/latest-updates/>

5) Costs of Implementation

- 20's Plenty has a rough rule of thumb of a cost of £3 per resident to introduce area-wide or borough-wide 20mph speed limits with the vast majority of the spend going on signage with other costs for promotion/communication, traffic orders and consultation.
- Implementation costs have been dramatically reduced with recent changes to regulations that no longer require 20mph limit signs to be lit. A major element of signage costs can be the need to sign the entrance to streets and roads with a 20mph limit. Thus if a main road is omitted from a scheme the signage costs (along with the associated clutter) will be far higher as every side road will require a sign to denote the change to from a 30 mph limit to a 20 limit. Wide-area/borough-wide schemes with few exceptions lead to lower costs and great consistency for residents and motorists alike.

¹⁰ <http://www2.uwe.ac.uk/faculties/BBS/BUS/Research/BSMC/20mph%20Research%20Findings.pdf>

6) London Boroughs

The latest public position of the London boroughs is that at least 8 London boroughs have adopted or are planning to adopt borough-wide 20mph limits on all the roads which they manage and a further 3 have adopted or pledge to adopt 20mph on all residential roads. These are outlined as follows:

A. Borough-wide 20mph Limits. A number of the London boroughs have moved towards borough-wide 20mph speed limits. These are:

- **Islington** implemented a 20mph speed limit on all the roads it manages in January 2013 through a mix of large signs, small repeater signs and 20mph roundels in the carriageway. As of 7th October 2014, the police started to enforce against those exceeding the 20mph limit.
- **Camden** implemented a policy of borough-wide 20mph speed limits on all on its borough roads in December 2013.
- **City of London.** An authority-wide 20mph speed limit came into force on 20th July 2014. All TfL controlled Red Routes are also included except for Upper and Lower Thames Street and the Tower gyratory which remain 30mph. Enforcement of the limit is being undertaken by City of London Police.
- **Southwark.** 20mph was adopted by full Council and approved by Cabinet for implementation. All roads (including main roads) will be 20mph by the end of 2014. Southwark have asked TfL to consider which of its Red Route roads in Southwark can become 20mph.
- **Lambeth.** Plans to move to 20mph on borough managed roads with implementation in 2015/16. Working with TfL on including appropriate Red Route roads.
- **Hackney.** On 29th January 2014, Hackney announced that it would be rolling out 20mph across the borough's main roads. The first tranche would be implemented between December 2014 and March 2015 with the remainder implemented by March 2016.
- **Lewisham.** The Mayor of Lewisham Sir Steve Bullock announced on 11th June 2014 that all of the roads in the borough will be subject to a 20mph limit.
- **Tower Hamlets.** October 2014 consultation on 20mph borough-wide speed limit. The results of this are likely to be known in early 2015. Working with TfL on including appropriate Red Route roads.

B. Position is Between 20mph on Residential Roads and Borough-wide 20 Limit

- **Waltham Forest** has a commitment to 20mph on all residential roads and in all residential areas and, as part of its Cycle Action Plan, appears to commit to a borough-wide 20mph limit.
- **Haringey.** Summer 2014 Cabinet adopts policy of 20mph on all residential roads and in town centres. Arterial roads remain 30mph. Traffic orders implementing the policy will be being issued in autumn 2014.

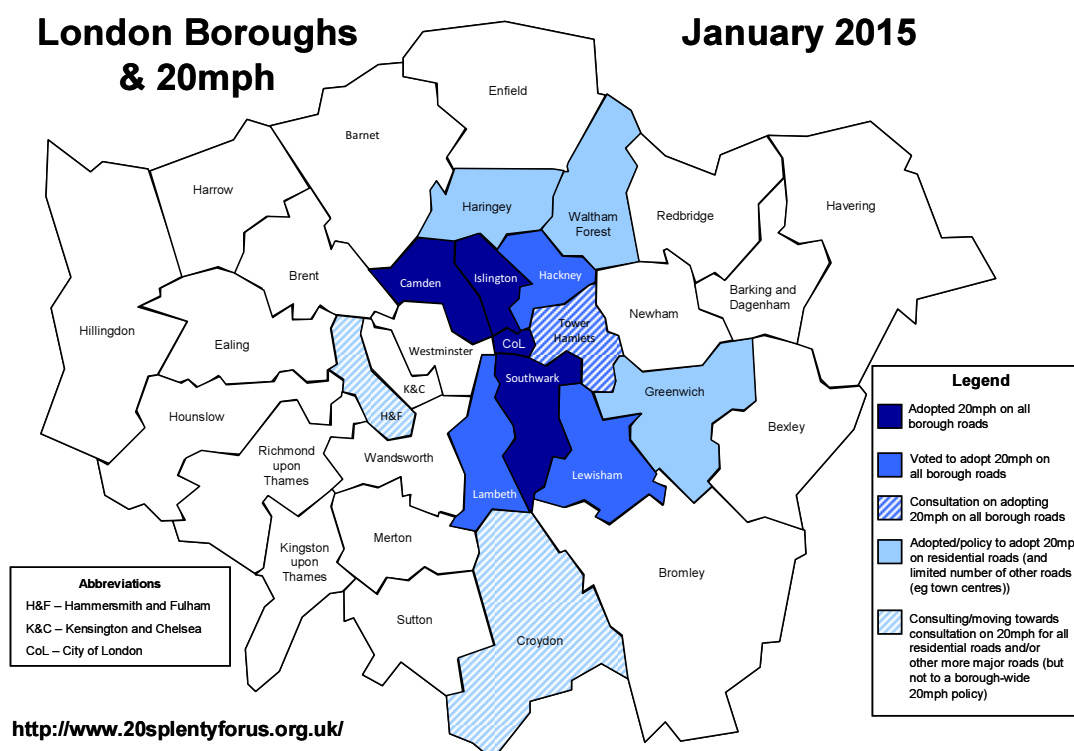
C. Residential Roads

- **Greenwich** has committed to 20mph (to be implemented over time via zones) on all its residential roads.

D. Amending Policy Towards 20mph Limits

- **Croydon.** September 2014 Council Scrutiny Committee investigates move towards 20mph on residential streets and some other roads (but excludes arterial A roads).
- **Hammersmith & Fulham.** Consultation begins in April 2015¹¹ on a programme to roll out 20mph limits to all residential roads between 2016 and 2018.

The current position of the London boroughs in terms of policy towards 20mph limits is summarised as:



We would once again thank you for encouraging and allowing this submission.

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¹¹ http://www.lbhf.gov.uk/Directory/News/Have_your_say_on_20mph_plan.asp