

# Appendix 1 - 20mph Public Consultation Response

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## Background

All Local authorities have an obligation to manage and improve road safety. Urban and city authorities are increasingly bringing forward the application of 20mph zones to help moderate the speed of motor vehicles and reduce accident rates. Tower Hamlets, like most other London boroughs, seeks to address safety whilst dealing with increasing traffic volumes, increased use of cycling as a mode of transport, increased population and pedestrian levels and increasing amounts of commercial haulage during a period of unprecedented public sector spending reductions. The Mayor of Tower Hamlets is committed to maintaining the focus on safety and made a pledge in his 2014 Manifesto to make residential streets in the Borough 20mph zones in order to help with this.

## Public Consultation

An article ran in East End issue 1030 (6<sup>th</sup>-12<sup>th</sup> October 2014) explaining the Council's proposals, this was supported by a number of smaller articles during the subsequent weeks.

### **Article in East End Life – Issue 1030 (6<sup>th</sup>-12<sup>th</sup> October 2014)**

*Tower Hamlets Council is looking at proposals to reduce the speed limit across the borough to 20mph.*

*This speed limit would be implemented on all borough roads except for the A12 and Limehouse Link/Aspen Way. The council is calling for comments on these proposals over a month long consultation period.*

*Around 85 per cent of the borough is already within local 20mph zones. The majority of these areas have experienced a reduction in the total number of casualties through road accidents. The blanket 20 mph limit would fill in the gaps, making it more consistent and easy to follow for road users. This has the potential to make Tower Hamlets' roads safer and more pleasant to use, encouraging more walking and cycling.*

*The Royal Society for Prevention of Accidents (RoSPA) reports that if a pedestrian is hit by a vehicle travelling at 20mph there is a less than 3 per cent chance that they will be fatally injured, compared to a 20 per cent chance at 30mph. About 80 per cent of collisions in the borough involve vulnerable road users including pedestrians, cyclists and*

*powered-two wheeler drivers who would most benefit from these safety gains.*

*The Red Route Network (TLRN) managed by Transport for London will also be considered for speed reductions through negotiation between the council and Transport for London. These roads include the A11, Burdett Road and A13.*

*There is approximately 29km of TLRN within Tower Hamlets and 280km of borough roads, but in 2013 two thirds of killed or serious collisions incidents (KSI) took place on the TLRN.*

*Other areas that have implemented a 20mph zone have shown that roads have not become more congested through the reduction in the speed limit. Early studies of existing 20mph speed limits schemes find that they generally produce an average reduction in speed of between 1 and 1.5mph.*

*Mayor of Tower Hamlets, Lutfur Rahman, said: "I am committed to making our streets and roads safer for all users to reduce accidents and injuries. The introduction of a 20mph limit is an effective starting point to achieve this aim."*

*Cllr Shahed Ali, Cabinet Member for Clean and Green, said: "20mph speed limits have been tried in other London boroughs and have been found to be very effective at reducing accidents without increasing congestion."*

*The charity "20's Plenty by Us" campaigns nationally for the reduction of speed limits. Jeremy Leach, from the charity, said: "We are delighted that Tower Hamlets is considering a 20mph speed limit for the borough. Slower speeds save lives and reduce injuries and encourage people to walk and cycle and take public transport"*

*"Across London, boroughs are embracing slower speeds and 20mph limits. Islington, Camden, the City of London and Southwark have already set their speed limit at 20 and Hackney, Lambeth and Lewisham are set to follow in the near future."*

*Comments are welcomed on the planned implementation of the 20mph speed limit throughout Tower Hamlets. Please send comments to [road.safety@towerhamlets.gov.uk](mailto:road.safety@towerhamlets.gov.uk) or write to Road Safety, Tower Hamlets Council, 6<sup>th</sup> Floor, Mulberry Place, 5 Clove Crescent, E14 2BG. The closing date for comments is October 31, 2014.*

This article gave a number of methods of contacting the Road Safety department to pass on views of the proposals, further information including "FAQ's" were available on the Council website with a banner on the front page. The LBTH twitter account also promoted the website, therefore the

majority of residents to emailed [road.safety@towerhamlets.gov.uk](mailto:road.safety@towerhamlets.gov.uk). This was an informal local consultation exercise that differs from the statutory consultation required for the traffic order writing process.

## Additional Consultees

In addition to the newspaper article the Council directly contacted a number of organisations, these included

- Canary Wharf Transport Forum
- Accessible Transport Forum
- Community Champion Coordinators
- Local business groups
- Emergency services
- Local sustainable transport groups
- Neighbouring Boroughs
- Transport for London

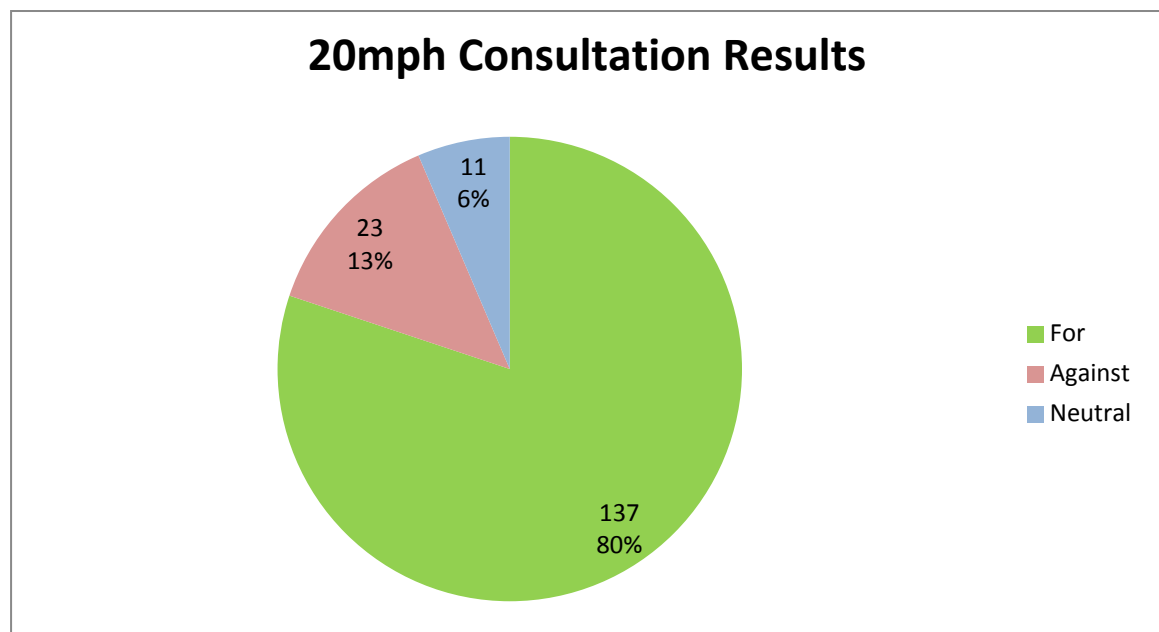
## Public Consultation Results

In total the council received 171 responses to the consultation, these were split as follows:

For – 137

Against – 23

Neutral – 11



This figure includes 103 (60%) organised by Tower Hamlets Wheelers (the local branch of London Cycling Campaign) through an automated form on their website.

## General Comments

Within the replies there were a number of recurring themes, these included but not limited to the following:

*For*

- Speed cameras required to enforce limit
- Additional police presence required
- Additional traffic calming
- Lower speeds can save lives
- General improvements to quality of life
- Will encourage walking and cycling on safer streets
- More education / soft measures needed

*Against*

- Will cause traffic problems
- Including TLRN to restrictive, only local roads
- Speeds should increase not decrease
- Existing 20mph not enforced
- Unfair on drivers

See appendices for results and brief summary of all comments

## **TfL and the TLRN Response**

TfL are using the Street Family Types set out in the Roads Task Force report as a framework and are currently developing an approach for identifying the potential for wider use of 20mph limits across London, including on TfL's roads. This approach is likely to involve trials to help understand the most effective means of implementation and compliance, particularly on busier roads where both place and movement functions are important.

When considering whether a 20 mph limit would be suitable for the TLRN within the context of the Street Family Types, the key aims is to reduce casualties, increase active travel and to enhance places, while seeking to maintain an appropriate level of "movement" function for the roads in question. The TfL road safety team are currently finalising an approach and identifying trial sites as well as monitoring the impact of a 20mph limit on two sections of the TLRN included experimentally within the City of London 20mph limit. TfL are also reviewing the case for other pilots following requests from several boroughs. Initial discussions have indicated that TfL may be agreeable to including Commercial Street in this pilot in order to better understand the effectiveness of such speed limits on the TLRN. Discussions are also taking place about a 20mph limit on the A11 as part of the CSH2 design review. It is unlikely that other TLRN routes would be included in the 20mph limit initially

## Police Response

Whilst the Metropolitan Police Service (MPS) support in general the objectives of a borough wide 20 mph limit, to make the environment around the roads of Tower Hamlets safer for all road users, we do have concerns in regard to unrealistic expectations of driver compliance and the enforcement that we will be able to provide. We have no objections to this proposal where it is in compliance with the DfT publication 01/2013 - Setting Local Speed Limits. We should make particular reference to the requirement for existing traffic mean speeds - in free flowing conditions - to be no greater than 24mph. For instance the five speed surveys recently completed on sections of the inner TLRN in Tower Hamlets have indicated that the mean speed through the majority of the day is indeed 24 mph or less, and we therefore have no objection to a 20mph limit being introduced on these roads, albeit with the caveat that overnight compliance with this lower limit is something that will need to be addressed by engineering or signage interventions. As you know, we currently have a further five surveys in place on the A11, and the reports in this case will include additional data giving mean speeds where the headway between vehicles is 3 seconds or more, which is effectively free flow conditions. We await the result of these surveys, upon which we will largely base our view of the effectiveness of a 20mph on this link.

In terms of other TLRN roads within Tower Hamlets, we have particular concerns in regard to A1205 Burdett Road, the majority of the A13 Commercial Road and the A1203 The Highway in terms of the suitability of these links for a 20mph limit. The more open and straight nature of these roads, and the impracticality of installing effective traffic calming measures on them, is likely to result in only a small reduction in traffic speeds, and almost certainly not to anything close to 20 mph. It is possible that mitigation measures (using traffic signals) linked to the East West CSH will reduce speeds on The Highway, at least during the working day, although such measures are unlikely to have any impact overnight, when speeds will clearly be higher.

A variable speed limit on such TLRN roads, reverting to 30 mph overnight, may be a practical solution, provided that it is based on and justified by analysis of collisions by time of day. This could be seen as a more realistic option, one that is likely to have greater support from drivers and, therefore, greater compliance when the 20mph limit is in force.

We must make it clear that speed enforcement is expensive; it is both time and resource intensive and competes with other important policing issues of equal public concern at a time of significantly reduced police budgets. There should be no expectation on the part of Tower Hamlets Council that the MPS will provide any additional general enforcement following implementation of a borough wide 20 mph limit. Enforcement must be seen as mainly reactive and should not be seen as a preventative measure to achieve the traffic speeds desired. This will only be achieved by public support and compliance by the majority. This compliance will only be achieved where there are sufficient interventions, in terms of signage and/or traffic calming, to make the 20mph

limit obvious to visiting motorists. To this end the MPS support the use of minimal 20mph signage where existing speeds are below 24mph, but urge that Tower Hamlets Council consider much more extensive signage and/or traffic calming on roads where speeds are currently higher than this.

As with all speed limits, if the site doesn't look like or feel like the limit imposed then there will be larger scale offending and routine prosecution seen as inappropriate and quite simply over the top. It is for Tower Hamlets Council 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 other road users.

Beyond this, it should be pointed out that the nature of the TLRN roads, and of the traffic using these links, does make them suitable for average speed enforcement using fixed cameras. Clearly this would be a significant escalation in the use of camera enforcement, and would require a political will from both Tower Hamlets and TfL to achieve, although in terms of effective enforcement to encourage compliance, this would be by far the most effective solution.

## **London Ambulance Service**

The London Ambulance Service (LAS) alongside the Metropolitan Police Service support the borough principals to make the roads in Tower Hamlets safer and reduce traffic related injuries/collisions.

During the day are there many roads in Tower Hamlets where drivers can achieve speeds above 30 MPH? (except the A12 and A13 / Aspen way). Not knowing the costs involved implementing this scheme as per your own consultation paper you are aiming to reduce the traffic by an average of 1 to 2 MPH which will stop 1 road traffic collision a week. Your paper does not state whether these would be serious collisions or damage only.

Not seeing the road casualty data which you quote in your consultation "(based on 2013 data)" I cannot see when the majority of these collisions occur, i.e. hour of day versus severity, number and type of road the collision occurred on. I did note that 2 thirds of KSI occurred on the TLRN therefore what roads / speed limits did the other third of KSI occur on?

With regards to enforcement some of our vehicles currently achieve speeds around 50 MPH whilst answering Emergency 999 calls within the borough. By reducing the speeds to 20 MPH any emergency vehicle travelling at 40 MPH would be double the speed limit and therefore may be liable to prosecution as double the speed limit may not be justifiable as safe driving in a court of law. This is going to have an impact not only on answering emergency calls to your offices, businesses, schools, residents and visitors but also getting them to hospital under emergency conditions too.

We also have the Helicopter Emergency Medical Service (HEMS) based at the Royal London Hospital. During the night the trauma team use Fast Response cars to respond to the most life threatening and seriously injured patients. With the same regard to the above paragraph this team would also be hindered in reaching time critical patients not only within your borough but also to get everywhere else within London.

## **London Borough of Hackney**

We have no objections and support the scheme in principal. Hackney Council is also implementing a similar initiative in 2015 and look forward to working with you on our boundary roads.

## **City of London**

We are supportive of your proposal. We believe that the introduction of a lower speed limit is the right thing to do in a busy environment such as inner London. We believe that it will improve road safety, provide better environment for other road users and provide greater continuity of speed limits across the borough boundaries.

## **Tower Hamlets Wheelers**

I am writing on behalf of Tower Hamlets Wheelers, the borough group of the London Cycling Campaign with over 450 paid-up members, with regard to designating Tower Hamlets a 20mph borough.

"Improving conditions for cyclists" is one of our group's main objectives and so we naturally fully support the council's proposals to implement a 20mph default speed limit on all borough roads in Tower Hamlets except for the A12 and Limehouse Link/Aspen Way.

We also give our full backing of the proposals to negotiate with Transport for London to set the speed limit on TRLN roads within the borough to also be 20mph. We will be happy to contribute to any such negotiations if required.

We want the roads of our borough to be safer and more pleasant to use when walking and cycling. It is well known that risk of serious injury or death to pedestrians/cyclists in a collision with a motor vehicle increases exponentially with speed [1]. Obviously when travelling at slower speeds, drivers will have more time to engage and react to other road users and are therefore in a much better position to prevent collisions. Setting a borough-wide 20mph speed limit is an important step to reducing collisions and KSIs to vulnerable road users.

We note that 85% of the borough's local roads are already within 20mph zones. However, there is currently not the feeling when walking and cycling around these roads that we are living and travelling in a slower, safer environment.

It is therefore essential that a major part of implementing this lower borough-wide speed limit is providing sufficient resources towards properly promoting it and explaining the need for behavioural change. Ultimately, the speed limit must be enforced. We would surmise that lack of enforcement is part of the current failing of the existing 20mph zones. We therefore request that a commitment to promotion and enforcement be made at the same time as any announcement to go ahead with the 20mph default speed limit.

Finally, we are glad to hear that you would aim to keep additional 20mph signage to a minimum. We assume also there will be many cases where existing signage in 20mph zones will actually be able to be removed so helping to de-clutter residential streets.

We look forward to a 20mph borough-wide speed limit being implemented and the quality of life travelling around the borough greatly improved



## Conclusion

The overwhelming majority of respondents to the 20mph consultation were in support of the 20mph limit proposed for Borough roads. Within the comments a pattern occurred with people requesting additional traffic calming, police enforcement and additional improvements for walking and cycling. It must be noted that 106 of the 137 responses in favour of the limit were generated by Tower Hamlets Wheelers through their website and Twitter feed.

Education is another theme that will need further exploring; additional “soft measure” will be needed to support the limit. “ASB Driving” is a continual problem in the Borough and a major concern to residents, not only highlighted through the consultation but ME’s and CC’s.

There were some resistance from respondents for the inclusion of the TLRN and what people regard as “major” roads but this is heavily outweighed by the requirement for slower vehicle speeds linked to cycling, in particular the requirement for the A11 – CS3.

The Metropolitan Police are generally in favour of the limit on streets with 85<sup>th</sup> percentiles below 24mph, they have concerns regarding roads with higher speeds without additional traffic calming.

## Appendices

Consultation Replies			
	Address	For or Against	Comments
1		F	Peds / cyclists put in front of cars
2		F	Speed cameras, problems with antisocial behaviour
3		N	Cyclists speed / cycle on pavement
4		F	20's plenty
5		A	Unnecessarily slows traffic if applied to major roads, 30mph not enforced, difficult to overtake cyclists
6		N	Minor roads only, would need to apply to cyclist who break laws
7		F	More education needed + speed cameras
8		F	will reduce KSI
9		A	I want less, not more regulations, Twenty is ridiculously slow.
10		F	a lower speed limit can not only save lives by reducing the number of accidents, and CO2
11		N	Work is required to reduce ASB driving
12		N	Sort out parking first
13		A	Wants 25mph, 20 too slow
14		N	Site specific concerns
15		F	Comments regarding CS2 design
16		N	Comments regarding CS2 design
17		N	The Alliance of British Drivers, for zones around schools but against blanket limits
18		F	Sustrans Bike it officers
19		F	Agrees
20		F	Agrees
21		N	trainee journalist, wishes to discuss limit
22		N	People drive too fast
23		A	20mph too slow
24		A	Nothing to do with road safety, money making plan, cyclist must pass test
25		F	Cyclist happy about proposal
26		A	20mph too slow, education needed
27		F	Standard Response
28		F	Standard Response
29		F	Hackney resident Enforcement needed
30		F	Standard Response
31		F	Standard Response

32		F	Standard Response
33		F	Standard Response
34		F	Standard Response
35		A	Various arguments around conflicting data from other areas
36		F	Standard Response
37		A	30mph is appropriate
38		F	In favour of limit
39		F	Standard Response
40		F	Standard Response
41		F	Enforcement required, site specific concerns
42		F	Support 20mph
43		F	Standard Response
44		F	Standard Response
45		A	Off peak 20mph too slow
46		F	Standard Response
47		F	Standard Response
48		F	Standard Response
49		A	Various arguments, money spent on education
50		F	Standard Response
51		F	Standard Response
52		F	Comments around A11, enforcement needed.
53		F	Site specific concerns, 20mph benefit to cyclists and peds
54		F	Support 20mph
55		F	Standard Response
56		F	A13 needs 20mph, enforcement needed.
57		A	30mph fine, ASB driving problem
58		A	No to blanket reduction, around schools only
59		F	Standard Response
60		F	Standard Response
61		F	Standard Response
62		A	Blanket reduction unnecessary
63		F	Standard Response
64		A	Will create traffic problems, local streets only
65		F	Support 20mph
66		A	Not required on all roads, local only
67		F	Standard Response
68		A	Speeds need to increase, not decrease!
69		A	Not fair on drivers
70		F	Standard Response
71		F	Standard Response
72		F	Standard Response
73		F	Increase walking and cycling
74		F	Benefit for cyclists

75		F	Standard Response
76		F	Standard Response
77		F	Standard Response
78		F	Standard Response
79		F	Standard Response
80		F	Standard Response
81		A	Decrease in air quality, poor driving standards won't change
82		F	Standard Response
83		F	Standard Response
84		F	Standard Response
85		A	Red Routes / A roads should not be included
86		F	Standard Response
87		A	THs already feels like one big estate with speed humps everywhere therefore further limits are not welcomed
88		F	Standard Response
89		F	Standard Response
90		F	More work needed for poor cycling facilities
91		F	Standard Response
92		F	Support proposal
93		F	Standard Response
94		F	Standard Response
95		F	Standard Response
96		F	Standard Response
97		F	Standard Response
98		F	Standard Response
99		F	Standard Response
100		F	Standard Response
101		F	Standard Response
102		F	Standard Response
103		F	Standard Response
104		A	speed limit should remain as 30 miles per hour rather than 20 as this could be seen as unnecessary
105		F	Campbell Road / Bow Road dangerous
106		F	A13 / Burdett required due to schools. Various concerns
107		F	Welcomes limit, enforcement needed
108		F	Standard Response
109		F	Standard Response
110		F	Standard Response
111		F	Standard Response
112		F	Standard Response
113		F	Warner Place needs increased traffic calming
114		F	Standard Response
115		F	Standard Response

116		F	Standard Response
117		F	Standard Response
118		A	Detrimental effect on people busy lives, more education needed
119		F	Standard Response
120		F	Standard Response
121		F	Standard Response
122		F	Standard Response
123		F	Standard Response
124		F	Standard Response
125		F	Standard Response
126		F	Standard Response
127		F	Standard Response
128		F	Standard Response
129		F	Standard Response
130		F	More enforcement of existing 20 needed.
131		F	Standard Response
132		F	Standard Response
133		F	Standard Response
134		F	Standard Response
135		F	Support limit but more segregated routes required and traffic calming
136		F	TH Wheelers Reply
137		F	Standard Response
138		F	Standard Response
139		F	Standard Response
140		F	Standard Response
141		F	Standard Response
142		F	Standard Response
143		F	Standard Response
144		F	Standard Response
145		F	Standard Response
146		F	Standard Response
147		F	Standard Response
148		F	Standard Response
149		F	Standard Response
150		F	Standard Response
151		F	Standard Response
152		F	Standard Response
153		N	London Ambulance response
154		F	Standard Response
155		F	Standard Response
156		F	Standard Response
157		F	Existing speed limit ignored, car levels increased, roads unsafe
158		F	Standard Response
159		F	Standard Response
160		F	Standard Response

161		F	Support limit, "modal filtering" needed
162		F	Standard Response
163		F	Standard Response
164		F	Standard Response
165		F	Standard Response
166		F	Standard Response
167		F	Standard Response
168		F	Standard Response
169		F	Urban Design Group - support limit, improvements for peds
170		N	Support limit but not all roads, 20mph too slow for major roads
171		A	Currently no enforcement of 20mph, therefore increasing limit pointless