



The Alliance of British Drivers

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Submission to the Consultation on 20 Mph Speed Limit Proposals for Croydon
(Reference PS/CH/Y86)

Dear Sirs,

Please take record our objections to the above proposal.

Please note that the Alliance of British Drivers (ABD) is not opposed to 20 mph speed limits in all locations - for example where the natural speed of traffic is near that speed. In many residential streets that is the case. However we are opposed to blanket wide area 20-mph limits because they are not a cost effective road safety measure, are not likely to be complied with and needlessly slow traffic.

1. It is clear that the proposals for North Croydon will cost a considerable sum of money (£300,000 according to the somewhat biased "FAQ" document on the scheme). The key question is whether the benefits of that expenditure outweigh the costs, i.e. that it is a superior cost/benefit ratio to spending that money on other things. I will cover that issue below. But it is worth noting that your FAQ document claimed that the scheme is not being funded from council tax revenue - that is grossly inaccurate as although the money is coming from Transport for London (TfL), as you are well aware TfL is part of the Greater London Authority which is partly funded by the local council precept and otherwise by central Government from taxation. To suggest that it is not funded by council tax revenue is not only wrong but clearly misleading in a more general sense as this project will be funded by taxes paid by the general population directly or indirectly, including the residents of Croydon.

2. In general the benefits of 20 mph signed area wide area schemes are grossly exaggerated. The average reduction in the speed of traffic is typically about 1 mph (assuming that there is no bias in the collection of data or other influences that might affect traffic speeds which is a dubious assumption). That speed reduction is not likely to have a significant or measureable impact on road traffic accidents and not have any impact on the general environment of the roads concerned. Neither is it likely to encourage cycling or walking or discourage driving so the general health benefits will be nil - indeed there is no good evidence yet available for any such positive benefits (cities such as Bristol have claimed such benefits but their evidence is statistically dubious in the extreme).

3. Your FAQ document suggested that if a 20 mph scheme was implemented across the whole of the borough, only 22 accidents would need to be saved at an average cost of £68,000 for the scheme to be cost effective. There are two problems with that claim which are 1) the average cost of an accident of £68,000 from the DfT is not a real cost (i.e. expense incurred) but is mostly made up of what people would be willing to pay to avoid such accidents - they clearly give a most optimistic figure when asked; and 2) there is no good evidence that 20 mph sign only schemes provide any real, statistically significant, and below trend accident reduction.

The suggestion from Research by the DfT that a 1% reduction in traffic speed translates into a 6% reduction in collisions is not borne out by the real world evidence but is based on a biased analysis of traffic speeds on different types of roads. There has been no proper "controlled" trial of the use of signed only speed limits. The results in Portsmouth (which are mentioned in your FAQ document as providing 21% reduction in collisions) do not provide firm evidence that there is any real benefit. Indeed KSIs in Portsmouth actually rose. I wrote this article on the bias inherent in the claims by Portsmouth that gives more information:

http://www.freedomfordrivers.org/Portsmouth_20Mph_Zones.pdf

4. More evidence. Historically there was a 20-mph speed limit across the whole of the UK before 1930 when accident figures were much higher. Accidents fell after it was removed. See this note for more information:

<http://www.freedomfordrivers.org/20Mph%20Speed%20Limits%20-%20The%20Historic%20Evidence.pdf>

5. It is also worth pointing out that the Department of Transport (DfT) have recently commissioned a three year study into the effectiveness of 20 mph schemes as they suggest that current evidence is "inconclusive". It would be rash of Croydon council to spend large amounts of money on any 20 Mph, signed only, schemes before more evidence is available on their financial benefit and effectiveness.

6. In general the evidence put forward by those who support 20 mph wide area speed limits as a road safety measure is dubious and I would welcome the opportunity to contradict any that you receive. They often rely on selection of the data while ignoring other factors that might affect the results. In practice, their understanding or statistical evidence and the scientific method is weak in the extreme.

7. So the key question, is whether spending £300,000 on such a scheme is worthwhile, or whether it would not be better to spend it on other road safety measures!

Regrettably a proposal to reduce traffic speeds looks both simple and attractive which is why politically it can appear to be sensible. But road safety is a much more complex matter that is not amenable to simplistic solutions. Smaller, focused road safety schemes would be likely to create much more benefit than putting up 20 mph signs everywhere (which will of course be ignored by many road users who will consider it an inappropriate speed for many roads in Croydon).

8. Imposing a speed limit that is lower than necessary will slow traffic of all kinds, and will not be adhered to unless there is massive expenditure on enforcement (which of course has been ignored in the cost/benefit calculations as has the cost of increased travel times).

9. I must also point out that the public "consultation", or "opinion survey", conducted by the council in respect of this matter was grossly defective and open to fraud.

As you are no doubt aware, we made previous representations about the proposed 20 mph wide area speed limit in North Croydon and we were keen to see a fair and open consultation on this matter. To that end we circulated a leaflet to residents encouraging them to respond to the consultation by the normal method, i.e. via your web site which is the normal process for public consultations nowadays. We understood that paper responses would only be made available on demand as noted in council reports on the consultation.

Although the results of the consultation suggest that there was an overall majority in favour, the split between on-line submissions and paper show a very different story. They give 42.5% FOR versus 53.1% AGAINST on the on-line submissions (total 2824 submissions) but 90.7% FOR versus 4.0% AGAINST in the paper submissions (total 535). Now anyone who has been involved in public consultations knows that it is very rare, if not impossible, to get a response of more than 90% in favour of anything. And clearly the paper responses swung the overall vote. Why should the results be so different on paper responses to on-line?

How was this achieved on the paper responses? Allegedly by some councillors and their supporters actually taking masses of paper forms and getting personal signatures on them by canvassing. One way to rig the result is simply to discourage those opposed from signing, or to discard those completed by those not in favour. Or of course it could be by simple submission of fraudulent entries which is a lot easier to do on paper than on-line.

In essence the results of this consultation are dubious in the extreme and I therefore ask that you discount the result and do not consider it a fair and honest representation of the views of the wider community.

I would also point out that the Council has a legal obligation to ensure that public consultations are fair and unbiased. This one was not from the very start when the information provided to residents was one-sided.

Now we see that it appears that Labour councillors (I am of course aware that it was a manifesto commitment), and other supporters of 20 mph schemes, are so dedicated to forcing through this proposal that they will use the most dubious, and indeed fraudulent, tactics to do so.

Finally, let me say that these proposals are being put forward by those who have little understanding of road safety or how to reduce accidents. In reality it is "gesture politics" of the worst kind. It is likely to result in fewer reductions in road casualties, and hence possibly more deaths, by wasting money that would be better spent on other road safety measures.

Yours sincerely

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