



The Alliance of British Drivers

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Jo Negrini
Chief Executive
London Borough of Croydon
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Via email

2 July 2017

Complaint re handling of objections to 20 MPH speed limit proposals for Areas 3, 4 and 5.

Dear Ms Negrini,

I refer to our objections to the proposed Traffic Orders (references PD/CH/A61, 62 and 63) and the responses given in the Report to the Traffic Management Advisory Committee dated 9 May 2017 and the subsequent considerations by Council Committees:

1. The objections by the Alliance of British Drivers were not named (as is normal practice in council reports) and the objections contained in our letters (which are attached) were not specifically dealt with.
2. Although there were some aspects of our complaints that were covered in the general responses in the aforementioned Report, many of them were not.
3. Specifically:
 - a) There was no attempt to provide a justification for the expenditure on this scheme versus alternative ways the money could be used to improve road safety in Croydon. In other words, there is no adequate cost/benefit analysis.
 - b) There was no explanation as to why the Council is pre-empting a Government commissioned report on the cost effectiveness of 20 mph schemes.

- c) There is no attempt to consider the actual evidence of the impact of 20 mph schemes that are in operation – for example Portsmouth that was mentioned in our letter where the data reported was in essence both selective and wrong, or areas such as the City of London where there has been no benefit whatsoever. There are now a number of such wide area, signed only schemes that have been in operation for some years from which data is available. They generally show no significant improvement over the general nationwide trend in accident reduction, and in some cases the benefits have been negative. The conclusion can only be that such schemes are an enormous waste of money, when it would be better spent on other road safety projects. In essence, the Council's report is biased and does not give a fair picture of the data that is available.
4. In summary, a number of our objections were not responded to specifically, or responded to in an inadequate manner.
5. In addition, our complaint about the consultation process outlined in our scheme objection letters have not been responded to – namely the sole use of a statutory consultation process, and the change from the consultation process from Areas 1 and 2. In reality the process selected was deliberately chosen in our view to enable objections to be ignored. Despite a very large volume of objections from not just organisations but members of the public, they have all been ignored with weak excuses given for doing so.

In essence, this whole process has been driven by political dogma and by Councillors who seem to have little interest in understanding the road safety issues or in listening to the views of objectors.

As the Chief Executive of the Council, it is your responsibility to ensure that the Council operates within the law that is relevant to public consultations and that such matters are handled fairly.

This has not happened in this case.

I await a response to this complaint.

Yours sincerely

Roger Lawson
Campaign Director