

REPORT TO:	TRAFFIC MANAGEMENT CABINET COMMITTEE 9 FEBRUARY 2011
AGENDA ITEM:	17
SUBJECT:	WOODCOTE VALLEY ROAD – 7.5T LORRY BAN
LEAD OFFICER:	Executive Director of Planning, Regeneration & Conservation
CABINET MEMBER:	Councillor Phil Thomas, Cabinet Member for Environment and Highways
WARDS:	Coulsdon West
CORPORATE PRIORITY/POLICY CONTEXT:	
LOCAL AREA AGREEMENT (LAA) TARGETS: These are not applicable for this report.	
FINANCIAL SUMMARY: The estimated cost to implement the schemes as recommended in this report is £20,000 to be met from TfL funding.	
FORWARD PLAN KEY DECISION REFERENCE NO: Not a key decision	

For general release.

1. RECOMMENDATIONS

- 1.1 It is recommended that the Cabinet Committee consider the objection received in response to the public notices and officer comment and:-
- a) agree the introduction of a 7.5 tonne lorry ban on Woodcote Valley Road, Purley Rise and Purley Knoll at an estimated total cost of £20,000, £5000 for design and consultation and £15,000 for implementation.
 - b) authorise the Executive Director of Community Services to make the necessary Traffic Management Order under section 6 of the Road Traffic Regulation Act 1984.

2. EXECUTIVE SUMMARY

- 2.1 This report is for the Cabinet Committee to consider objections and comments received from residents of the Woodcote Valley Road, Purley Rise and Purley Knoll area following the publication of public notices giving notice of the Council's proposal to introduce a 7.5 tonne lorry ban in the area bordered by those roads.

3. DETAIL

- 3.1 On 23 November 2010 (Minutes A73/10 refer), the Cabinet Committee approved a report authorising the publication of public notices under the relevant sections of the Road Traffic Act 1984 and giving authority to the Executive Director of Community Services to make a Traffic Management Order for the introduction a 7.5 tonne lorry ban on Woodcote Valley Road, Purley Rise and Purley Knoll, as shown on the attached plan TH 2824, subject to the results of the public notices.
- 3.2 The public notices were advertised on 29 December 2010, giving residents 21 days to respond with any objection or comments to the 7.5T lorry ban proposals. One objection has been received from someone who does not live in the area affected by the proposal. A copy of the objection and comments from officers is attached to appendix A of the report.
- 3.3 For the reasons given in the Appendix supported by the responses from a number of residents it is recommended that Cabinet Committee approve the introduction of the 7.5 tonne lorry ban on Woodcote Valley Road, Purley Rise and Purley Knoll and authorise the Executive Director of Community Services to make a Traffic Management Order for the proposal.

4. CONSULTATION

- 4.1 In July 2010, a petition signed by 371 residents was presented to Members of the Council by Cllr Bains on behalf of residents of Woodcote Valley Road in the following terms:
- “We, the undersigned residents of Woodcote Valley Road, Purley, wish to register our strong objection to the constant daily use of this road by 38 tonne lorries heavily laden with building site rubble, and which operate at 2-3 minute intervals from 6am until late afternoon, causing excessive noise pollution and damage to both roads and property. We therefore request that urgent action is taken to curtail the use of this road by these vehicles which are the cause of considerable distress to the residents and a danger to the many children from adjacent Woodcote Nursery and St. David's Schools.”
- 4.2 Transport for London have been consulted and have no objections to the proposals.
- 4.3 The Ward Councillors have been consulted and support the proposal.

5. FINANCIAL & RISK ASSESSMENT CONSIDERATIONS

5.1 Revenue and Capital consequences of report recommendations

		Current year	Medium Term Financial Strategy – 3 year forecast		
		2010/11	2011/12	2012/13	2013/14
		£'000	£'000	£'000	£'000
Revenue available	Budget				
Expenditure					
Income					
Effect of decision from report					
Expenditure					
Income					
Remaining budget					
Capital available	Budget				
Expenditure		5.0	15		
Effect of decision from report					
Expenditure		5.0	15		
Remaining budget		0	0		

5.2 Effect of the decision

The total cost of introducing the lorry ban is estimated to be £20,000, which includes the design, implementation and legal costs. At present there is provision of £5,000 identified within the 2010/11 programme for the design and consultation and a bid for the balance of £15,000 for the implementation has been made in the Council's Annual Spending Submission. However, should sufficient savings be identified in this year's programme then the aim is to implement the scheme this financial year. Should no further funds become available then the project will finish at the design and consultation stage.

5.3 Risks

If the lorry ban cannot be implemented then the available funding would have to be spent elsewhere, subject to the agreement of TfL funding programme managers or returned to TfL.

If the Cabinet Committee agrees to introduce the lorry ban then the risk of heavy goods vehicles causing personal injury or damage to private property is reduced significantly. It should however be noted that some heavy goods traffic could be diverted to other nearby roads.

There is a risk that some heavy goods traffic diverted on to Smitham Bottom Lane will add to congestion at the junction of Smitham Bottom Lane/Foxley Lane/Woodcote Road and Little Woodcote Lane.

5.4 Options

There is the option to fund the scheme this financial year (2010/11) should there be savings in the programme. This would require TfL approval.

5.5 Future savings/efficiencies

There are no financial savings or efficiencies arising from this report.

Approved by Ian Geary, Finance Manager, Planning Regeneration & Conservation.

6. COMMENTS OF THE COUNCIL SOLICITOR AND MONITORING OFFICER

- 6.1 The Solicitor to the Council comments that in order to restrict the movement of heavy goods vehicles Woodcote Valley Road it will be necessary for the Council to make a Traffic Management Order under section 6 of the Road Traffic Regulation Act 1984.

Approved by Gabriel MacGregor, Head of Legal Services (Corporate) on behalf of the Council Solicitor and Monitoring Officer

7. HUMAN RESOURCES IMPACT

- 7.1 There are no additional human resource implications arising from this report as the design and implementation of this programme of works will be managed by existing Planning, Regeneration and Conservation staff.

Approved by: Chris Baldwin, HR Business Partner, on behalf of the director, Human Resources & Organisational Development.

8. EQUALITIES IMPACT ASSESSMENT (EIA)

- 8.1 The regulation of heavy goods vehicles in Woodcote Valley Road, Purley Rise and Purley Knoll will benefit all road users including pedestrians.

9. ENVIRONMENTAL AND DESIGN IMPACT

- 9.1 Removing higher polluting and noisy vehicles from the area will provide environmental benefits to residents. Conversely, the signs will be required to be illuminated in the hours of darkness and this will result in additional energy being used and light pollution.

10. CUSTOMER IMPACT

- 10.1 In terms of customer focus residents have called for the removal of heavy goods vehicles from the area and if the scheme goes ahead then this is likely to be regarded as a positive move.

11. CRIME & DISORDER REDUCTION, and HUMAN RIGHTS IMPACT

- 11.1 There are no crime & disorder reduction or human rights impacts arising from this report.

12. FREEDOM OF INFORMATION / DATA PROTECTION CONSIDERATIONS

- 12.1 Whilst the subject matter of the consultation exercise will be accessible under the Freedom of Information Act 2000, details of the names and addresses of those responding to the consultation would constitute personal information and therefore be exempt under the Data Protection Act 1998.

Report Author: Rowland Gordon, Planning, Regeneration & Conservation
Telephone:- 020 8726 6000 ext. 64906

Background Documents: None

Dear Croydon Council,

Reference CS/PS/JH/7/Z58

I write to submit a further formal objection to these proposals, by way of amplification of my previous objection sent earlier today.

I write on behalf of the ABD, as the duly appointed representative of the ABD in Croydon with around 20 members in the borough.

I write as Secretary of Sense With Roads, a Croydon-based organisation representing road users, with around 20 members in the borough, and only myself as member of both ABD and SWR.

I also write as a local resident, and a member of ECRA, and as a founder member of the Coulsdon NP and Roads Rep of the Coulsdon NP for 2005-2009.

I know this area well and use it frequently, and have done done at least 20 years.

I will amplify these objections with detail later today.

(1) There is no need for these restrictions.

While it is acknowledged there has been a number of local protests and a campaign over heavy lorries using Woodcote Valley Road, there is no evidence that the lorries were causing any actual harm.

The Petition states a "strong objection to the constant daily use of this road by 38 tonne lorries heavily laden with building site rubble, and which operate at 2-3 minute intervals from 6am until late afternoon, causing excessive noise pollution and damage to both roads and property."

This implies 20-30 lorries an hour over at least 10 hours, and I know from my own experience that this is a gross exaggeration.

Indeed the council's own survey shows only 69 HGV's in a four hour period, ie 17 an hour - and it must be assumed that this is the maximum figure the council obtained.

I have seen HGV's in WVR, but modern HGV's like this are not particularly noisy.

Some HGV's have a clear need to use WVR to access property in the area.

It should be noted that WVR is a bus route, with 4 buses an hour using the road.

The petition asserts "damage to both roads", however WVR was resurfaced relatively recently.

There is no evidence of any damage to the road as a result of these lorries, and indeed as a key secondary route, used by emergency services and of course dustcarts and other heavy service vehicles, it must be maintained to a standard to cope with heavy lorries.

No evidence is produce that these HGV's are causing damage to property, and of course there is no reason why this should be.

WVR is a fairly wide single carriageway with 2 lanes in each direction and relatively few parked vehicles, except at school times at the Purley end.

There is no reason why 15-20 lorries an hour should be a particular danger to schoolchildren, given that WVR has a significant flow of general vehicles, with far more cars than lorries.

Indeed the council's own survey data shows nearly 3 times as many light goods

vehicles, which would be wholly unaffected by the proposed 7.5t weight limit.

Officers response: The petition calling for the Council to do something to deal with the traffic problems in Woodcote Valley Road was signed by 371 residents. Prior to the petition a number of concerns had been raised by residents about the increased volume of HGV's using the road. The Metropolitan Police also expressed some concerns about the heavy laden goods vehicles using the road.

Woodcote Valley Road has a primary school spread over two sites (which requires the children to cross the road), a children's nursery, a residential care home and sheltered accommodation. Parts of the road are traffic calmed with speed cushions. Some of the complaints received suggest the lorries are travelling very close to the footway, mounting kerbs, driving towards other vehicles in an intimidating and threatening manner and were causing distress and danger to pedestrians and other roads users.

Site observations and a traffic survey carried out along the road show a significant number of heavily laden goods vehicles using the route and that some were travelling at inappropriate speeds.

(2) This proposal runs counter to sound traffic management policy

It is sound policy to encourage traffic to use the shortest available route in terms of distance and time.

Forcing lorries to travel further than needed is undesirable in principle, and here the alternative route via the Foxley Lane mini-roundabout is appreciably further.

There is no basis for saying that WVR is unsuitable for lorries, even though it is accepted that some local residents may prefer they went elsewhere.

This weight restriction will not reduce HGV mileage in Purley.

Instead it can only increase it, as HGV's will not avoid Purley altogether, and will have to travel further as a result of this weight limit.

Officers response: Croydon Council is committed to providing a safe environment for all road users. There are alternative and suitable routes for the lorries to travel along.

(3) The report to TMCC recommending this 7.5t lorry ban contains questionable facts and analysis

There is no basis provided that this scheme would be good value for money.

There is reason to suspect that lorry use of WVR has built to a peak, and has subsequently fallen away.

It is noticeable that the report refers to "traffic surveys" in the plural, but does not quote the actual figures, merely one high point from them.

No reference is made to consequent changes to the recently introduced 7.5t weight limit nearby.

There would be one large 7.5t lorry ban area, and any vehicle requiring access to any part of that area could use any access point into it.

In particular, no mention is made of the need to remove signs at the entry from WVR into Manor Wood Road and into Grovelands Road.

The report states

"If the Cabinet Committee agrees to introduce the lorry ban then the risk of heavy goods vehicles causing personal injury or damage to private property is reduced significantly. It should however be noted that some heavy goods traffic could be diverted to other nearby

roads.

There is a risk that some heavy goods traffic diverted on to Smitham Bottom Lane will add to congestion at the junction of Smitham Bottom Lane/Foxley Lane/Woodcote Road and Little Woodcote Lane."

There is no evidence or reason to believe that the overall risk of "heavy goods vehicles causing personal injury or damage to private property" would be reduced.

While it might be reduce on WVR itself, including at junctions at either end, it would be increased on the alternative routes, which are longer, and involve more conflicts with other traffic.

It does mention the risk of increased traffic congestion at what is already a point of serious congestion and delay at busy times.

Of course, it is more than a risk, as it is highly likely that HGV traffic banned from using WVR will cause increased congestion along alternative routes, rather than simply disappearing.

However the report does not quantify these effects, and makes no attempt to analyse the costs and benefits.

The report also ignores the likelihood of the ban causing more traffic congestion at the key bottleneck pinchpoint of Purley Cross nearby.

Thus it also fails to quantify these effects

The report makes no attempt to analyse the overall costs and benefits.

§8.1 states "The regulation of heavy goods vehicles in Woodcote Valley Road, Purley Rise and Purley Knoll will benefit all road users including pedestrians."

However this is patently untrue.

The HGV's which are to be banned will clearly lose out.

Traffic on the alternative routes will have to travel amongst the HGV's diverted from WVR, and they will clearly lose out.

Pedestrians wishing to cross any of the alternative routes will also have to cope with additional HGV traffic, and so lose out.

There is no attempt to quantify the gains and losses to these vehicles and pedestrians, let alone any basis for concluding the overall effect will be beneficial.

It is a serious defect in the report that effects on and losses to HGV operations are ignored.

Officers response: Removing higher polluting and noisy vehicles from the area will provide environmental benefits to residents. Furthermore the introduction of the lorry ban would reduce the risk of heavy goods vehicles causing personal injury or damage. The average cost of a personal injury collision in a built up area is in excess of £90K. Reducing the risk of a collision involving a HGV in the road is expected to provide significant cost and environmental benefits.

(4) The alternative routes are not suitable, and involve significant extra mileage, and involve using the Foxley Lane mini-roundabout, a location with a significant accident and injury record

§5.3 from the report is quoted above.

The "junction of Smitham Bottom Lane/Foxley Lane/Woodcote Road and Little Woodcote Lane" is a known bottleneck congestion point.

The location has a worryingly high accident record already.

Any impact between a HGV and a car or van is likely to be severe.

Foxley Lane is a single carriageway 2 lane road with many bends and quite a high volume of traffic and junctions.

Smitham Bottom Lane is also a single carriageway 2 lane road. Although fairly straight, it rises and falls, and also has quite a high volume of traffic and junctions

The left turn from FL into SBL and the right turn from SBL into FL at the 7.5t weight limit lorry ban are both tight and awkward for large vehicles, and there is a risk to pedestrians crossing there - with narrow pavements and carriageways.

There is no reason to believe that forcing HGV's to use this route instead of WVR is likely to reduce the number of accidents or casualties, or their severity.

The report does not in fact analyse alternative routes for diverted HGV's.

Officers response: During the Councils investigations into the extent of the problems described by the petitioners, our officers followed the lorries between a site in Mitcham and a site in Redhill just off the A23. It is clear to officers that the lorries are not using the most direct route to get between their proposed destinations. Staying on the A23 will provide a better alternative

(5) The report to TMCC does not claim there is any accident history involving HGV's in this area, and I question whether there is in fact any history of accidents or major problems at this location relating to heavy good vehicles.

As above, there is no reason to believe that this proposal would improve road safety or reduce accidents.

Indeed, it may well make the overall accident record worse.

In the absence of any evidence of accidents in WVR, but the known history of accidents on the alternative routes, this can only worsen the accident record.

Officers response: See point 3. The proposal will reduce the risk of collisions involving HGV's.

(6) The proposal is defective because Furze Lane is not included in the ban, yet the signs are proposed at Foxley Lane. / Furze Lane / Woodcote Valley Road

There is no practical way to avoid confusion and misleading signs at this location.

Thus the council would need to include the whole of the Woodcote Village area in the ban.

Alternatively, HGV's might be confused at the junction of WVR with Foxley Lane and Furze Lane.

Officers response: Signs at this location will be installed at the Woodcote Valley Road/ Foxley Lane junction and will ban all vehicles over 7.5Tonnes "except for access". HGV's with legitimate business in the area such as refuse trucks, delivery vehicles, etc will still be able to gain access. The restriction will only apply to HGV's looking to use the road as a 'rat run'. HGV's wishing to access Furze Lane will also be exempted from the ban.

(7) This scheme would impose needless extra costs in the delivery of goods and services and there is no good reason for this

It should be noted that HGV traffic provides an essential and vital service to the country's economy.

It also provides a supply of essential goods to the community.

Its needs should be one priority concern for the council as highway authority, but that does not appear to be the case.

HGV traffic banned from using WVR would have to travel further, and journeys would take longer.

This puts up delivery costs both directly by increasing the cost of each delivery run, and in terms of drivers hours.

Officers response: The lorry ban will exempt those with legitimate business in the area such as refuse trucks, delivery vehicles, etc. It will only restrict HGV's looking to use the road as a 'rat run'. HGV's wishing to access Furze Lane will also be exempted from the ban.

(8) This scheme does not represent a good way to spend public money, and the signage would be unsightly.

The report identifies no way that this 7.5t weight limit lorry ban would achieve a financial return on the expenditure.

It ignores the costs to HGV's banned from WVR.

At a time of financial crisis and spending cuts, the council should cut back on such discretionary spending, and only impose such bans where they are clearly necessary - which is not the case here.

Officers response: See response to point 3 above.

(9) Under the HRA, the council may only restrict the ability of the public to use the highway if it is clearly necessary.

In order for this 7.5t weight limit lorry ban to be lawful, the council must under the HRA 1998 demonstrate a clear need for the restriction.

The council has demonstrated no necessity for these proposals, and so the proposals are unlawful.

Thus I object to this proposed 7.5t lorry ban.

I say it is unnecessary, the plans are defective, and the net effect would be harmful.

Officers response: Local authorities have a statutory duty of care to its road users and the 7.5T lorry ban scheme is being proposed out of the concerns raised by residents, the Metropolitan Police and officers.

(Name removed) Resident of Coulsdon Woods, ABD Rep for Croydon, Coulsdon Roads & Traffic Consultant, Member of Coulsdon NP and of ECRA, NP Roads Rep 2005-2009, Secretary of SWR

PJM, 1455, Wed 19-1-11

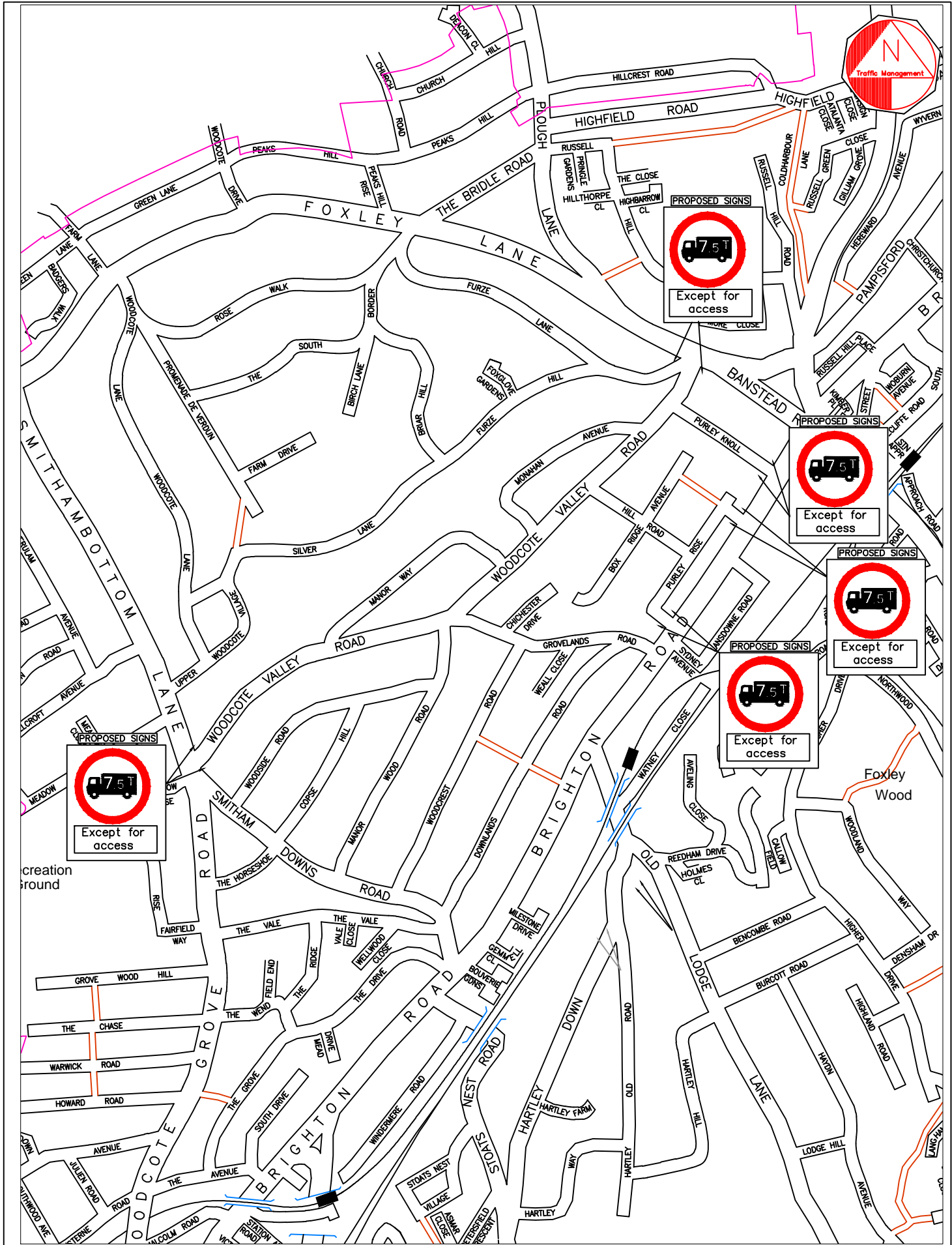
ABD - Association of British Drivers

ECRA - East Coulsdon Residents Association

NP - Neighbourhood Partnership

HRA - Human Rights Act, in particular, Protocol 1 to Article 1

SWR - Sense With Roads



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scheme name
LIP Corridors
 Woodcote Valley Road, Purley
 Rise and Purley Knoll

drawing title
7.5Tonne Lorry Ban



scale NTS	drawn by RG	date Oct 10
ECONOMY & SUSTAINABILITY		drawing no. TH 2824
Accident Prevention Engineering		