

**TRAFFIC & NETWORK MANAGEMENT**

**20mph speed restriction policy**

**Report on Consultation**

**November 2013**

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## **1.0 Introduction and background**

- 1.1 In January 2013 the Department for Transport (DfT) published Circular 01/13 'Setting Local Speed Limits'. The Circular provides updated guidance to local highway authorities on how to set the appropriate level of speed limit in both urban and rural environments. In comparison to the previous DfT guidance, Circular 01/13 includes additional information on the use of 20mph speed restrictions (zones and limits) and provides guidance on the criteria used to determine those locations where their use can be considered.
- 1.2 In advance of the publication of Circular 01/13 and in recognition of the likely increase in the number of requests for rural 20mph limits, Wiltshire Council carried out its own trial of a small number of 'sign only' 20mph limits at selected village locations across the county during the 2010/11 financial year. The results of the trials have been used in conjunction with the DfT guidance to develop an overall draft policy for Wiltshire.
- 1.3 The draft Wiltshire Policy on 20mph speed limits and zones sets out the proposed eligibility criteria and a mechanism to allow assessment and delivery of received requests for 20mph restrictions. The draft policy was subject to an eight week consultation via the council's website to allow comments to be received before a final policy is formally adopted.
- 1.4 The consultation period commenced on 1<sup>st</sup> August and closed on the 21<sup>st</sup> September 2013.

## **2.0 Response to consultation**

- 2.1 In total 78 responses have been received. Of these 46 refer to and make comment on the draft policy with the remaining responses relating to new requests for 20mph restrictions. A summary of the comments received to the draft policy along with officer responses is included at Appendix 1. A list of those locations requesting a 20mph restriction is included at Appendix 2.
- 2.2 The response received from Wiltshire Police indicates support for the draft policy.

## **3.0 Status of Circular 01/13**

- 3.1 The following statement is from the DfT and clarifies the status of Circular 01/13.

*The DfT circular 01/2013 is guidance to local authorities on setting local speed limits. The guidance is designed to assist local authorities with their decision making process, but is not mandatory.*

*Departmental guidance is invariably based on best practice and it is hoped that local authorities take note of the advice provided. However, guidance is by its very nature, optional.*

*The Department would much rather local authorities have the flexibility to introduce speed limits that are appropriate for the local environment. This reflects the wider Government belief in localism and, wherever practicable, in the right of local authorities to make decisions that best reflect the needs of their communities.*

## **4.0 Substantive comments**

### **Funding**

- 4.1 The draft policy sets out at paragraph 7 a proposed funding mechanism for 20mph restrictions in Wiltshire. A number of respondents to the consultation have commented the CATG's have insufficient funds to review and implement 20mph speed restrictions and that the assessment and delivery of the schemes should be funded centrally by the council. Comment is also made regarding additional sources of potential funding, i.e Section 106 monies, public health funding and the local sustainable transport fund (LSTF).

- 4.2 Across the eighteen community areas in Wiltshire there is a current total funding allocation of £400,000 available directly to the Area Boards / CATG's for use at their discretion on Highway matters. In addition there is a centrally held amount of £250,000 for what is known as 'Substantive' CATG schemes to which groups can bid on an annual basis. As such there is a total of £650,000 of funding available that could be used to implement 20mph restrictions if groups choose to do so. In addition the draft policy makes clear that assessment, design and traffic regulation order costs would be borne centrally by the Council. It is estimated that this could amount to approximately £100,000 per year. All of this funding comes from the Council's Integrated Transport block which for 2014/15 will stand at £3.66million. This level of funding is considered to be appropriate given the other demands on this budget
- 4.3 The Integrated Transport Block supports schemes that are principally intended to address casualty reduction and encourage walking, cycling and the use of public transport. This is in line with the Government's objectives of promoting alternative forms of transport and reducing road collision casualties, for which there are a number of national targets.
- 4.4 The opportunity to make use other funding sources, including Area Board grants, Section 106 monies etc can and will be taken as individual circumstances allow.

#### **Number of assessments**

- 4.4 A number of respondents have commented that two assessments per year per community area will not be enough to facilitate demand.
- 4.5 There are 18 community areas across the County which means there is potential in year one that 36 locations would be subject to review. In year two this may result in a potential roll out of '36' 20mph restrictions whilst another 36 are assessed. This level of commitment is considered to be commensurate with the available resource and future funding. It is accepted however that the situation will need to be closely monitored (as set out at paragraph 8.2) and the policy be reviewed after an agreed period in light of achieved progress.

#### **Enforcement**

- 4.6 Concern is raised about lack of enforcement of existing 20mph restrictions and how any new 20mph restrictions will be enforced moving forward.
- 4.7 Under the relaunched Community Speedwatch (CSW) initiative the volunteers are now able to undertake speedwatch activities in 20mph speed limits and zones.
- 4.8 ACPO speed enforcement guidelines include thresholds for enforcement across all speed limits, intended to underpin a consistent policing approach. Within that framework local police forces will take a responsible and proportionate approach to enforcement of 20mph limits based on their assessment of risk to individuals, property and the seriousness of any breach. Where drivers are regularly and wilfully breaking the law we would expect that the police will seek to enforce the limit and prosecute offenders.
- 4.9 Wiltshire Police have stated that Local Neighbourhood Policing Teams (NPT's) can conduct speed enforcement activities within 20 mph limits/zones where deemed appropriate. In essence, if NPT's are seeking to address a reported speeding issue they can conduct targeted enforcement where necessary, however enforcement will not be routinely undertaken on 20mph roads. The approach of Neighbourhood Policing Teams in every community is built around ensuring that local crime and disorder issues and concerns are identified, to which the police deliver an appropriate policing response. This applies to enforcement of 20mph restrictions as to any other area of policing.

#### **24mph Average speed threshold for 20mph restrictions**

- 4.10 Comment is made regarding the use of a 24mph mean speed as a determining threshold level for 20mph limits. The suggestion being the draft policy is not within the spirit of the guidance and the view expressed in Circular 01/13 indicates that an appropriate speed limit should be set

along with other measures (such as engineering, publicity, education etc) in order to achieve the appropriate level of compliance.

- 4.11 Circular 01/13 advises that 20mph limits need to aim for general compliance with no expectation on the police to provide additional enforcement. With average speed reductions of approximately 1mph for 'sign only' limits the introduction of 20mph limits on those roads where speeds are in excess of 24mph is unlikely to be sufficient on its own to make the limit generally compliant.
- 4.12 The interim evaluation report on the Portsmouth 20mph speed limit concluded that within an area wide application of 20mph sign only limits, those roads with average speeds in excess of 24mph did benefit from greater speed reductions but not to the extent that the 20mph speed limit was considered self enforcing.
- 4.13 It is accepted that where 'before' mean speeds are marginally above 24mph, the introduction of 20mph limits in conjunction with lighter or soft touch engineering measures is likely to result in general compliance. As such it is fully expected that a degree of flexibility will be required in determining whether a 20mph restriction can be introduced. However where overall average speeds are higher, reliance on light touch engineering measures, publicity and education in order to achieve compliance is likely to be unrealistic, especially in the long term. As a result the wider community benefits so often associated with 20mph restrictions are also unlikely to occur thereby resulting in long term community dissatisfaction.

#### **Area wide 20mph speed restrictions**

- 4.14 The view is expressed that the draft policy is out of kilter with DfT advice and does not support the use of area wide 20mph limits. This is incorrect. The use of area wide 20mph limits is supported but it is accepted that clearer reference to this should be included at paragraph 5.2 of the Policy.
- 4.15 A number of respondents from Bradford on Avon have expressed a desire to see a town wide 20mph limit covering all roads. This is considered impractical and would not be in compliance with DfT guidance. Paragraph 84 of Circular 01/13 sets out those areas that are considered suitable for 20mph restrictions. Paragraph 90 and Table 1 of Circular 01/13 state that 20 mph limits and zones should only be used where motor vehicle movement is not the primary function. Radial routes into the town centre (Bradford Road, Frome Road, Winsley Road etc) and internal distributor roads (Moulton Drive, Springfield etc) would not be suitable. However other areas of the town, predominantly the residential areas are highly likely to be suitable and could be subject to area wide 20mph limits.

#### **Road hierarchy**

- 4.16 Comment is made that the Circular does not preclude consideration of other roads for 20mph limits whilst the draft policy limits their use to those roads classified as Category 4B of the adopted Wiltshire Council Road Hierarchy. As set out in paragraph 5.2 of the draft policy it is considered that Category 4B roads are likely to be the most suitable for 20mph limits. It is however accepted that some of the areas set out at paragraph 84 of the Circular, while not being Category 4B roads, may be suitable for 20mph limits. Consequently a more liberal interpretation of the terms of reference may be appropriate in some circumstances.

### **5.0 Conclusions**

- 5.1 There is evidence that 20mph limits, where appropriately applied, can bring about a number of positive effects on road safety, quality of life, and encourage healthier modes of transport such as walking and cycling. In order to be successful, speed limits require the respect of drivers and this can only be achieved where the reasons for the limit are unambiguous and where broad compliance is achieved without excessive reliance on police enforcement or widespread engineering measures. The Wiltshire policy seeks to build upon the evidence provided by its use of 20mph zones, the rural 20mph limit trials and DfT guidance in Circular 01/13 to provide a robust policy which encourages their use in areas where the benefits are tangible, measurable

and supported by the police. To do otherwise will result in poorly considered 20mph limits in which overall driver compliance is low and where public acceptance of all 20mph limits is gradually eroded.

- 5.2 The draft policy is considered to be robust and compliant with the DfT guidance. It seeks to introduce 20mph restrictions into those areas that are credible and where the benefits are real, true and measurable and not just done for popularist or political gain.
- 5.3 The delivery mechanism set out in the draft policy is considered to be fair, equitable and commensurate with the available funding and resource available.
- 5.4 Some revision to the draft policy is required to aid clarification in relation to the speed threshold, area wide restrictions, and road hierarchy.

## **6.0 Recommendations**

- 6.1 It is recommended that the following changes be made to the draft policy:
  - i. Paragraph 5.2 should be amended to include reference to paragraphs 84 and 97 of the Circular to aid understanding of those areas where 20mph limits may be applied.
  - ii. At paragraph 5.2 the requirement for before speeds to be at or below 24mph be amended to cover those locations where speeds are just above this threshold and the use of lighter engineering measures are appropriate to bring speeds down to 24mph or less.
  - iii. Paragraph 5.2 should be amended to allow consideration of roads that are not Category 4B where it can be demonstrated that significant pedestrian and cycle movements take place.

**Appendix 1**

<b><u>20mph speed limit restrictions policy</u></b> <b><u>Results of Consultation</u></b>			
	<b><u>RESPONDEE</u></b>	<b><u>COMMENTS</u></b>	
<b>C1</b>	Resident of Bottlesford	Is concerned about motorists exceeding 30mph restrictions and the lack of meaningful enforcement. Considers that this should be addressed first rather than lowering limits to 20mph	The enforcement of any speed limit is the responsibility of the Police rather than the Council. Communities can get involved in dealing with speeding issues through the Community Speedwatch (CSW) initiative that has recently been relaunched by the Police. The volunteer CSW groups are now able to be supported by targeted enforcement activities undertaken by the Police.
<b>C2</b>	Resident of Foxley Road, Malmesbury	Considers blanket 20mph speed limits in town centres an excellent idea.	Comment noted
<b>C3</b>	Wiltshire resident	Considers 20mph limits unenforceable as there are not enough community cameras, and that speed cameras are not calibrated for less than 30mph. Asks if enforcement would be done by the community or the Police.	See response to substantive comments
<b>C4</b>	Resident of Tisbury	Supports 20mph limits without traffic calming but does not support vertical deflections. Limits should be supported by cameras and speed detecting signs	<p>The type of traffic calming feature used will be the one that is considered to be the most suitable and effective taking into account local conditions. The use of vertical features would be included in this. However before any measures are introduced local consultation would be undertaken and this would give residents and others the opportunity to comment on the form of any feature proposed.</p> <p>The use of cameras and speed detecting signs is not considered practical. Enforcement – see response to substantive comments.</p>
<b>C5</b>	Resident of Trowbridge	Supports full time 20mph limits outside schools due to their longer opening hours. Suggests 20mph limits on side roads to prevent rat running.	The use of 20mph speed limits outside schools is subject to a separate review.



<b>C6</b>	Resident of Britford Lane, Salisbury	<p>Considers that there is a wide held belief that 20 limits are not legally enforceable but that enforcement is needed.</p> <p>Prefers chicanes to speed bumps due to damage to vehicles.</p>	<p>Enforcement - See response to substantive comments</p> <p>The type of traffic calming feature used will be the one that is considered to be the most suitable and effective taking into account local conditions. The use of vertical features would be included in this. However before any measures are introduced local consultation would be undertaken and this would give residents and others the opportunity to comment on the form of any feature proposed.</p>
<b>C7</b>	Pewsey CATG	Considers that CATG's do not have enough funds to review and implement any schemes and that this should be paid for centrally.	See response to substantive comments
<b>C8</b>	Resident of Dauntsey Wharf	Does not support 20mph restrictions at all except outside schools. Considers that road safety training would be a better way of improving road safety.	<p>The use of 20mph speed limits outside schools is subject to a separate review.</p> <p>The Council through its Road Safety Unit already carries out road safety training activities with a range of age groups and different types of road user. It is the combination of Engineering, Enforcement and Education that brings about better road safety for all.</p>
<b>C9</b>	Resident of Wiltshire	Considers that 20mph zones should be used on rat runs and on routes to schools	Comment noted.
<b>C10</b>	Resident of Spirhill, Calne	Is against the use of 20mph limits. Believes the broad application of 20mph limits is flawed and will be ignored by most drivers over time. Believes that educating drivers would be far more beneficial. Believes that efforts should be directed to rural roads as this is where the serious collisions take place not the roads in urban areas that are already subject to 30mph restrictions.	20mph restrictions are seen as one solution within the options available to deal with improving road safety. They sit alongside the driver education activities already undertaken by the Council. The Wiltshire Policy seeks to only introduce 20mph restrictions where they will be adhered to and respected by motorists
<b>C11</b>	Resident of High street Cricklade	Concerned about lack of enforcement of existing 20mph restriction and considers that more creative solutions are needed	See response to substantive comments
<b>C12</b>	Resident of Lower Bemerton Salisbury	<p>Considers that the policy is cautious and does not refer to other benefits such as noise reduction and encouragement of walking and cycling.</p> <p>Is concerned that the budget for scheme delivery is very small.</p> <p>Considers the policy will introduce 'satellite' 20mph zones but the route between not benefitting from a 20mph restriction.</p>	<p>The quality of life and community benefits are clearly set out within the Circular 01/13. The draft policy sets out at paragraph 5.1 that a Wiltshire Policy should not deviate from the guidance given in Circular 01/13. As such the policy does not seek to repeat all the information set out in the guidance. Rather the two documents should be read together.</p> <p>Budget matters – See response to substantive comments</p>
<b>C13</b>	Malmesbury Town Council	Support the Policy	Comment noted
<b>C14</b>	Monkton Farleigh Parish	Fully support the introduction of 20mph restrictions but question the logic of only	24mph Threshold - See response to substantive comments

	Council	doing so when the speed is already 24mph or less. Considers the 8 week consultation period to be too short	A Cabinet Member decision is normally available for a 10 day consultation period. The consultation period for the draft 20mph policy was extended to 8 weeks to allow full public comment to be made. All Parish and Town Councils were notified of the opportunity to comment via the Area Board /CATG mechanism.
<b>C15</b>	Resident of Wiltshire	Considers 20mph zones to be silly and a waste of time and that the Council has better things to do.	Comment noted.
<b>C16</b>	Resident of Patney	Does not consider that lowering a speed limit to 20mph will have a significant effect. Those who drive fast will continue to ignore a lower limit. Considers lower limits to be a driver irritation.  Promotion of responsible driving is the key, not rules that penalise the great majority of sensible drivers.  Lots of speed limit changes cause scepticism and irritation. Better to have fewer but necessary limits	Comment noted. The Wiltshire Policy seeks to only introduce 20mph restrictions where they will be adhered to and respected by motorists  Comment noted  The setting of speed limits in Wiltshire is done by following the guidance contained in Circular 01/13 Setting Local Speed limits. This guidance has been written on the basis of best practise across the United Kingdom.
<b>C17</b>	Ham Parish Council	Support the policy	Comment noted
<b>C18</b>	Resident of Wiltshire	Supports 20mph speed limits	Comment noted
<b>C19</b>	Resident of Malmesbury	Supports 20mph restrictions on housing estates and back roads but considers that 30mph should be retained on A & B class roads.  Is concerned about the design of some speed humps and the damage they do to some types of vehicles.	The draft policy proposes that the function of a road is one of the determining factors in deciding whether a 20mph restriction can be introduced. This is explained further in paragraph 5.2, 5.3 and at Appendix C.  Speed humps are designed to be in accord with the DfT guidance. As such they should not damage the majority of vehicles if driven over at an appropriate speed.
<b>C20</b>	Baydon Parish Council	Supports the policy but considers that two assessments per year is not enough.  Requests a 20mph restriction on Manor Lane.	See response to substantive comments  Request noted.
<b>C21</b>	Easton Royal Parish council	Support the policy	Comment noted
<b>C22</b>	Cricklade Town Council	Is concerned about lack of enforcement of its existing 20mph limit and considers that the Police and Wiltshire Council are obstructive to enforcement activities and the use of SIDS/CSW. Considers that simply saying that 20's need to be self	See response to substantive comments

		enforcing is not good enough.	
<b>C23</b>	Bradford on Avon Town Council	Considers that the policy is out of kilter with DfT advise and support the use of area wide 20mph limits.	See response to substantive comments
<b>C24</b>	Hindon Parish Council	Supports 20mph limits in Hindon but considers that they will only succeed as part of a wider strategy of traffic calming, better support of CSW, more frequent SID deployment and better driver education	See response to substantive comments
<b>C25</b>	Resident of Chain Lane Warminster	Supports the policy and suggests closing roads that are unsuited to through traffic use.	Comment noted. The closing of a road can be considered and is possible. However the impact on the wider road network and other residential areas would need to be taken into account. Suggestions of this nature need to be considered by the Area Boards / CATG's in the first instance
<b>C26</b>	Resident of Teffont Ewyas	Supports the use of lower speed limits but considers the draft policy to be over cautious particularly the limit of two locations per board area per year.	See response to substantive comments
<b>C27</b>	South Wiltshire Agenda 21	Supports 20mph restrictions in all residential areas of Salisbury but is concerned that the CATG funding allocation will not be enough and that the schemes should be funded centrally.	See response to substantive comments
<b>C28</b>	Resident of Westwood	Considers that the 20mph speed limit through Lower Westwood does not work and that further measures are required to reduce vehicle speeds.  Is concerned about future enforcement of 20mph limits by the Police.	Additional physical measures to reinforce the 20mph limit could be provided if they can be shown to be justifiable and have community support. The resident should approach the Parish Council in the first instance to discuss this further.  It is understood that a Community Speedwatch team is being set up in Westwood and this should help adherence to the 20mph limit.  Police enforcement - See response to substantive comments.
<b>C29</b>	Calne Community Matters Blogsite	Wants measures to reduce speed introduced through Quemerford particularly around Holy Trinity School.  Supports 20mph but asks who will enforce it and deal with illegal parking  Suggests all of Calne should be 20mph and that number plate recognition cameras at each entry and exit be used rather than Policemen.	The use of 20mph speed limits outside schools is subject to a separate review.  See response to substantive comments  A town wide 20mph limit covering all roads is impractical and would not be in compliance with DfT guidance. Paragraph 84 of Circular 01/13 sets out those areas that are considered suitable for 20mph restrictions. Paragraph 90 and Table 1 of Circular 01/13 state that 20 mph limits and zones should only be used where motor vehicle movement is not the primary function. Radial routes into the town centre and internal distributor roads would not be suitable. However other areas of the town, predominantly the residential areas are

			highly likely to be suitable and could be subject to area wide 20mph limits.
<b>C30</b>	Salisbury City Council	<p>The proposed Wiltshire policy on 20mph speed limits and zones gives too narrow a focus on existing speeds and is based on trials in Wiltshire's rural villages which have limited applicability to an urban area such as Salisbury. It provides a very limited budget for what can potentially be a highly cost-effective road safety measure giving multiple additional benefits in terms of improving safety, making communities better places to live and providing a better walking and cycling environment.</p> <p>We would like to see the policy radically revised to include the following:</p> <ul style="list-style-type: none"> <li>• A strategy to implement 20mph speed limits and zones in Salisbury, in line with the recommendations in the Cycle and Pedestrian Access Study report (June 2013) which resulted from Wiltshire's LSTF bid. This report proposed, as a key part of the development of town cycle networks in Wiltshire, the implementation of 20mph zones across all urban areas, if necessary beginning with residential roads and in town centres and where necessary supporting 20mph speed limits with traffic calming measures. It was noted that the scheme in Laverstock which had seen the central line removed and cycle lanes added in each carriageway had been very successful in slowing traffic and making a safer environment for cyclists.</li> <li>• A recognition of the need for public engagement, education and publicity as part of the package of measures which is needed within a 20 mph policy</li> <li>• Consideration of the benefits which can accrue in urban areas from reduced speeds, noting that the implementation of Salisbury City Centre's 20mph zone was shown to have reduced casualties by 46% when comparing the 3 years before and after implementation</li> <li>• The wider benefits of 20 mph zones, in terms of a safer environment for walking and cycling and the health benefits of these active travel options should be mentioned.</li> <li>• Wider sources of funding should be sought rather than restricting funding of 20mph limits and zones to the existing CATG budget. Further funding from the integrated transport block allocation, developer funding, public health funding and other sources such as LSTF should be considered to enable a more far-reaching policy to be implemented.</li> </ul>	<p>The report referred to was produced by Sustrans as part of looking at cycling routes to the railway station. Whilst the report did recommend 20mph restrictions in some areas it did not propose 20mph zones across all urban areas in Salisbury.</p> <p>The LSTF project parameters and associated funding is set by the bid application. In essence this means, the enhanced Trans Wilts rail service, rail station and associated sustainable transport link improvements (e.g. walking and cycling routes), and supporting wider initiatives (e.g. Connecting Wiltshire website and personalised travel planning). There is no provision in the project to support the development or implementation of 20mph zones.</p> <p>Any proposal to introduce a 20mph restriction would be supported by appropriate consultation and public engagement.</p> <p>The quality of life and community benefits are clearly set out within the Circular 01/13. The draft policy sets out at paragraph 5.1 that a Wiltshire Policy should not deviate from the guidance given in Circular 01/13. As such the policy does not seek to repeat all the information set out in the guidance. Rather the two documents should be read together.</p> <p>See response to substantive comments</p>
<b>C31</b>	Woodborough Parish Council	<p><b>General Conclusions</b> Appendix 1 (2.1 &gt; 2.3) indicates that the resulting reductions in both speed and collision rates from implementing a 20 mph zone are demonstrably higher than similar reductions in 20 mph speed limits. Bearing this in mind it would seem likely that, assuming various other conditions are, in the main, met (5.3), that the use of</p>	Comment noted

	<p>zones may probably be preferable to limits in most cases.</p> <p><b>Criteria</b>  WPC appreciates the comments in Appendix 1 (5.1 and 8.1), and would urge WC to consider each rural situation on its merits, taking evidence not only from published collision data, but also from the local Neighbourhood Policing Team, the parish council, and any other organisations that could be categorised as having 'vulnerable residents' (such as care homes, schools etc). WPC also appreciates that Circular 01/13 must always be the starting point for setting 20 mph speed limits but, arguably unlike many urban situations, such as housing estates that probably tend to be more standard in their requirements, the 'one size fits all' approach to rural situations would not be realistic.</p> <p>For example, if only 4 or 5 of the criteria for a 20 mph zone (possibly less in the case of a 20 mph limit) were met, then the 'missing' 1 or 2 criteria would not necessarily mean that a 20 mph zone could not be implemented.</p> <p>The 'Residents Comments' section in each of the five 'test villages' would seem to indicate that strict adherence only to the DfT criteria may be seen as supporting the case for a more flexible assessment of requests for 20 mph zones and limits.</p> <p><b>'Joined – up Thinking'</b>  Whilst Circular 01/13 is likely to be generally used as the informed basis for assessing 20 mph zones and limits, WPC would urge WC to consider a number of other pressures on the roads infrastructure, principally;</p> <ul style="list-style-type: none"> <li>-It is apparent that there is constant pressure on schools (including church / faith schools) by the LEA to increase school roll capacity. According to government net immigration statistics published recently, and the forecasts for the next few years, this is likely to increase the pressure for places in both rural and urban schools, and especially so where there may be further closure of some very small rural / village schools.</li> <li>-It is also apparent that, when school roll capacity is increased, little or no consideration is ever given to the impact of the inevitable increase in traffic (whether school buses or parent vehicles) on rural communities in terms of increased congestion at peak times, drop-off / pick-up areas, or longer term parking.</li> </ul> <p>To a lesser, but nonetheless relevant, extent consideration should be given to a school's specific 'Travel Plan', and advice or comment should be sought from 'Taking Action on School Journeys – TAOSJ' during the assessment period for any additional or enhanced traffic management projects, which would include assessments for 20 mph zones and limits, be they full time or part times zones or limits.</p> <p>WPC considers that the result of not having employed 'joined-up thinking', and with</p>	<p>20mph restrictions would only be taken forward when Parish Council and community support can be clearly demonstrated.</p> <p>It is fully expected that some flexibility will be required in determining whether a 20mph restriction can be introduced on Area wide schemes.</p>
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		<p>the steadily increasing volumes of both domestic and commercial road transport generally, over a long period of time historically has now lead to the serious states of traffic congestion and low levels of pedestrian (and child) safety that exists currently in many rural Wiltshire villages today. Hence, today many of those villages are playing 'catch-up' to try and alleviate those situations.</p> <p><b>Enforcement</b> WPC agrees with ACPO's current position in that new 20 mph speed limits should be self-enforcing, and that targeted enforcement by NPT's based on local intelligence from time to time is the optimum way forward. For example, WPC has confidence that its local NPT would be sympathetic to requests for occasional requests for an on-site presence in order to give 'encouragement' to drivers to adhere to the new limit. It may also be useful if any newly implemented limit could automatically be placed on the SID list for early treatment.</p> <p><b>Funding and Process (Mechanism)</b> WPC appreciates that ratification of the proposed policy may well lead to a relatively high initial demand for both limits and zones (the latter being more expensive to implement where no existing traffic calming measures already exist. In the few cases where traffic calming measures do exist, it is likely that the cost of implementing a zone would be substantially reduced, and may be no more than implementing a limit).</p> <p>WPC agrees that the Area Board / CATG process is probably the optimum mechanism for prioritising requests.</p> <p>WPC considers that, because of the necessarily long period that it usually takes to assess and implement such projects, which if the target is to achieve two installations a year that initially four requests are assessed and prioritised – two projects in year one and two in year two. Thus, if during the assessment period a project fails to satisfy the required criteria, it can be replaced immediately with the next highest priority project.</p> <p>WPC considers that the Area Board provides the best mechanism to deal with administering requests for 20 mph zones and limits, and appreciates that funding any Area Board sponsored project will always depend on the budget given by WC. Because the implementation of 20 mph limits or zones is likely to become an additional responsibility of the Area Board it is essential that 'new money' is set aside for this purpose, and failure to do so whilst still implementing new 20 mph projects within the existing budget might diminish the effectiveness or feasibility of other projects, and therefore public perception of, the Area Board.</p>	<p>Comments are noted</p> <p>See response to substantive comments</p> <p>See response to substantive comments</p> <p>Comment is noted</p> <p>Each Area Board / CATG is to be tasked with producing a prioritised list of locations for assessment. However through careful consideration and choice at the initial stage of prioritisation it is thought that the failure rate would be extremely low.</p> <p>See response to substantive comments</p>
C32	Tollard Royal Parish Council	<p><b>Generally:</b> Tollard Royal Parish Council has considered and discussed this proposed policy, in conjunction with the DfT Circular 01/13 "Setting Local Speed Limits", and I have been instructed to write to make the council's representations.</p>	

	<p>The council believes that the overall thinking behind this policy is flawed in that speed limits should be set with the prime purpose of ensuring the safety of all road users and not just the desires of drivers of motor vehicles. Speed Limits should not be set by relation to mean speeds, but should be used where those actual mean speeds need to be brought down to a level which is safe for pedestrians and other road users, as well as motorists, and which improves the quality of life for local residents.</p> <p>Villages have generally been here far longer than motor vehicles and the roads through them tend to be narrow, often single track, and with no pavements or street lights. They are bordered by village houses and are used by local pedestrians and walkers. These roads are dangerous and generally need mean speeds bringing down to circa 20 mph for the safety of local residents and visitors. These are absolutely situations where the speed limits should not be set by relation to mean speeds, but are situations where mean speeds need to be brought down to a level which is safe for pedestrians to emerge from concealed gateways and to walk up the street. It is simply not safe to drive through many of them at 30 mph but, with the sophistication of today's motor vehicles, many drivers believe they are. The limits need enforcing, both by changing the "streetscene" and by the police.</p> <p>Tollard Royal will be very similar to many rural villages across Wiltshire. Whilst not one of the experimental Wiltshire villages, it has had a 20 mph limit for many years. The village Community Speed Watch team has actually recorded one motorist driving at 53 mph! and during a session this week 21% of drivers were driving at 25 mph or faster, which is not unusual. No limits are "self-enforcing" these days.</p> <p>It would be very easy to be cynical about large parts of this report. The DFT emphasises that 20 mph limits should not be set in isolation, but as a package with other measures to manage vehicle speeds and improve road safety (ie changing the streetscene) but this will involve cost, so the council is concerned the desire will be to follow the "mean speed route" and that appropriate 20 mph limits will be avoided to avoid the cost of these extra measures.</p> <p><b>Specifically:</b> I set out below this council's representations specifically related to individual sections in the appendices:</p> <p><b>Appendix 1</b> <b>Section 2.4</b> - Speed limits should be set for safety reasons. The DfT circular 01/2013, in para 18, makes it clear that actual vehicle speeds should be <u>safe and appropriate for the road and its surroundings</u>. Despite what drivers think, the existing mean speed may be too high and totally inappropriate for the location. For example, the mean speed may be 32 mph suggesting a limit of 30 mph when, for residents' safety it ought to be brought down to less than 24 mph by setting a 20 mph limit and incorporating traffic calming. Otherwise, what limit would "mean speeds" suggest as appropriate for motorways and various dual-carriageways?</p>	<p>With the publication of Circular 01/06 Setting Local Speed Limits in 2006 the DfT introduced the concept of linking speed limits to recorded mean speeds of traffic. This applies to all levels of speed limit not just 20mph limits. The reasoning and underlying principles behind this is fully explained in the Circular. Circular 01/06 was superseded in January 2013 by Circular 01/13 and this again reiterated that mean speeds should be used as the basis for determining speed limits.</p> <p>Circular 01/13 advises that if a speed limit is set unrealistically low for the particular road function and condition, it may be ineffective and driver may not comply with the speed limit.</p> <p>See substantive response</p> <p>Circular 01/13 is clear in that the 20mph limit will only be successful when the character and environment of the road is suited to the a lower limit. It is unreasonable to expect drivers to adhere to any posted limit if there is a mismatch between the limit and the environment or if there is insufficient visual information to reinforce the level of limit in place. Whilst traffic calming and other engineering features can be used to help control vehicle speeds they should not be relied upon to ensure compliance.</p>
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	<p><b>Section 2.7</b> – but what about the quality of life and perceived safety of the inhabitants? Wiltshire’s trial should not be viewed in isolation. Statistics produced elsewhere are just as valid in Wiltshire. Consideration should be given to the way in which 20 mph limits are used, for example, in Somerset.</p> <p><b>Section 3.1</b> – zones have traffic calming measures which make the difference. Para 95 states the obvious! If a mean speed is already at or below 24 mph on a road, introducing a 20 mph limit through signing alone is <b>obviously</b> going to lead to general compliance. <b>It’s already happening!</b> What Para 95 doesn’t do is suggest remedies for roads where mean speeds are too high and <b>need</b> to be brought down for the safety of pedestrians and other road users.</p> <p><b>Section 3.3 – Para 132</b> – quote “Such limits should not, however, be considered on roads with a strategic function or where the movement of motor vehicles is the primary function.” Villages historically sprang up along such roads long before motor vehicles made them dangerous. Are modern residents simply expected to have to take their chances?!</p> <p><u>West Coker, in Somerset, is on the A30, a road with a strategic function if ever there was one, and has a 20 mph limit in the centre of the village on the A30. Somerset County Council obviously takes a different and less mean speeds orientated approach than Wiltshire Council.</u></p> <p><b>Section 4.1</b> – Quote “The safety of Wiltshire residents continues to be the overriding concern of the council.” This is good to hear but hard to believe if motorists are to be allowed to set the speed limits through council usage of their mean speeds when, for residents’ safety, the mean speed ought to be brought down to less than 24 mph by setting a 20 mph limit and incorporating traffic calming and police enforcement.</p> <p><b>Section 4.2</b> – The Association of Chief Police Officers has decided unilaterally not to enforce 20 mph limits. This is surely unacceptable and must amount to the condoning of crime. They go hammer and tong for motorists doing 105 mph on a safe motorway, but ignore one doing 50% over a 20 mph limit! The police and the courts should adopt a process where the lower the speed limit, the greater is the infringement.</p> <p><b>Section 5.2</b> - The criteria for considering 20 mph limits should not only be “where mean “before” speeds are at or below 24.0 mph.” This is too easy. It favours the motorist and does not take into account the safety of residents living with mean speeds of 30 mph, or more, which, for safety, should to be brought down below 24 mph.</p> <p><b>Section 8.1</b> – Road safety concerns will not be addressed, and the Wiltshire Council will have no credibility, if 20 mph speed limits are only introduced where mean speeds are already less than 24 mph (that is, where there seems no need</p>	<p>Wiltshire’s trials have not been used in isolation in preparing the draft policy but have been used in addition to other information available at a national level. The way in which Somerset have introduced 20mph limits is not a material consideration in the drafting of a Wiltshire policy.</p> <p>Comment noted.</p> <p>It is not for us to comment on the reasons why Somerset have gone against the advice provided in Circular 01/13. This is their decision and one that they have to take responsibility for.</p> <p>With the publication of Circular 01/06 Setting Local Speed Limits in 2006 the DfT introduced the concept of linking speed limits to recorded mean speeds of traffic. This applies to all levels of speed limit not just 20mph limits. The reasoning and underlying principles behind this is fully explained in the Circular. Circular 01/06 was superseded in January 2013 by Circular 01/13 and this again reiterated that mean speeds should be used as the basis for determining speed limits.</p> <p>See substantive response.</p> <p>The Circular advises that all 20mph limits need to aim for compliance with the new limit and that there should be no expectation on the police to provide additional enforcement to ensure compliance. The Circular further advises that as average speed reductions through sign only limits are on average 1mph, introducing 20mph limits on those roads with speeds above 24mph is likely to be insufficient to make the resulting speeds generally compliant with the new 20mph limit.</p> <p>It is accepted that where ‘before’ mean speeds are marginally above 24mph, the introduction of 20mph limits in conjunction with lighter or soft touch engineering measures is likely to result in general</p>
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		<p>for such a signed limit!). They must be used where there is a need to bring down higher mean speeds to a more responsible and safe level and the council must accept that money will need to be spent on changing the “streetscene” to produce traffic calming as an integral part of the new speed limit.</p> <p>The police must also accept that they have to play their part in reducing what is probably the most frequent cause of crime in many of Wiltshire’s villages by enforcing the limits, rather than just sitting on motorways and dual-carriageways which are a lot safer than village roads, which are often little more than lanes through village centres. As mentioned earlier, the lower the limit, the greater the infringement.</p> <p><b>Appendix A</b> How will Area Boards/CATG groups prioritise credible locations? What will be the criteria used? Why will only 2 sites per Board Area be taken forward for assessment? -This has all the signs of ignoring residents (ie voters/rate payers) wishes If criteria are not met a <u>full explanation</u> must be given to the town/parish council for publication.</p> <p><b>Appendix B</b> <b>A2 -</b> this is cannot really be true. It means the road needs traffic calming and police enforcement! <b>A4 -</b> This could probably also be said of 70 mph limits! <b>A5 -</b> How should they be self-enforcing? <b>A7 -</b> This guidance is patently silly. If Speed Limits should be set for safety reasons then appropriate limits should be applied – as they are on the A30 in the centre of West Coker, Somerset, where a 20 mph limit operates very successfully. <b>A9 -</b> Will they prosecute? They are loath to get involved at the moment <b>A 10 -</b> Will they get the same follow up of persistent offenders that 30 mph limits are supposed to get? <b>A16 –</b> This is a generalisation and the same thing could be said of all limits.</p> <p><b>Conclusion</b> Speed limits should <u>not</u> be set by relation to mean speeds, but should be used where mean speeds <u>need to be brought</u> down to a level which is safe for pedestrians and other road users. With the sophistication of today’s motor vehicles no limits are “self-enforcing”. Setting limits to suit the existing mean speed simply allows drivers to set the limit and does not recognise that many believe they can drive faster than they should. No road through a village, where the road is single track, or narrow, and where there are no pavements, should have a speed limit higher than 20 mph. These limits should be supported by traffic calming and different “streetscene” measures and the police, and the courts, should adopt a policy where “the lower the speed limit, the greater is the infringement” and spend far more time ensuring that these limits are observed.</p>	<p>compliance. As such it is fully expected that a degree of flexibility will be required in determining whether a 20mph restriction can be introduced. However where overall average speeds are higher, reliance on light touch engineering measures, publicity and education in order to achieve compliance is likely to be unrealistic, especially in the long term. As a result the wider community benefits so often associated with 20mph restrictions are also unlikely to occur thereby resulting in long term community dissatisfaction.</p> <p>See substantive response.</p> <p>See substantive response.</p> <p>See responses above</p> <p>Comment not understood See responses above What evidence does the objector have that the West Coker scheme is successful? It goes against all the advice in the Circular.</p> <p>See substantive response. See substantive response.</p> <p>Comment noted</p> <p>The Circular advises that all 20mph limits need to aim for compliance with the new limit and that there should be no expectation on the police to provide additional enforcement to ensure compliance. The Circular further advises that as average speed reductions through sign only limits are on average 1mph, introducing 20mph limits on those roads with speeds above 24mph is likely to be insufficient to make the resulting speeds generally compliant with the new 20mph limit.</p> <p>It is accepted that where ‘before’ mean speeds are marginally above 24mph, the introduction of 20mph limits in conjunction with lighter or soft touch engineering measures is likely to result in general compliance. As such it is fully expected that a degree of flexibility will be required in determining whether a 20mph restriction can be</p>
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			introduced. However where overall average speeds are higher, reliance on light touch engineering measures, publicity and education in order to achieve compliance is likely to be unrealistic, especially in the long term. As a result the wider community benefits so often associated with 20mph restrictions are also unlikely to occur thereby resulting in long term community dissatisfaction.
C33	Calne Area Transport Group	<p>The general concern with this proposed policy is that it is insufficiently ambitious and lacks strategic vision. The benefits of 20mph limits and zones are becoming much more widely recognised and accepted by other local authorities who have seen the benefits of introducing area wide 20mph limits as a default on residential streets. However those local authorities have agreed to allocate very considerable funds from their transport budgets for programmes which would ensure implementation of 20mph speed limits and have put the public consultation and completion of statutory processes at the forefront of their approach to the issue.</p> <p><u>Detailed concerns with the proposed Wiltshire policy.</u> The policy focuses on existing speeds and signage. It does not consider the need for public engagements, education and the importance of publicity which are an essential part of any process involving a wide ranging public use of roads. The public have to understand the need for and benefits of lower speeds. An issue which is concerned with behavioural change and how society values different transport modes must be accompanied by considerable serious engagement.</p> <p>If traffic authorities see wide-area use of 20mph limits and zones as a serious means of achieving the aspiration for safer and calmer streets and roads then it must be understood this is very much more than simply an interaction between drivers and signs.</p> <p>We fail to understand how the idea of appropriate speed limits be rationed to a maximum of two locations per Area Board per annum (6.1 – 6.2). It is not consistent with the statutory responsibility to set appropriate speed limits for all roads.</p> <p><u>Funding.</u> It is proposed that the funding for 20mph limits is paid for through the CATGs. The Community Area Transport Groups receive only a small proportion of the integrated transport budget which Wiltshire Council receives from central government. Will Wiltshire seek funding from other sources such as Public Health, s106, and Local Sustainable Transport fund in order to be able to implement serious and visible changes on the ground or merely deliver a watered down version of what should be a realistic and deliverable aspiration?</p> <p>The policy does not appear to adequately consider the far ranging benefits which are gained from 20mph limits and zones. The safer environment for healthier travel (walking and cycling), increased mobility for the elderly and for children and the safer urban environment are not given the profile they deserve.</p>	<p>Any proposal to introduce a 20mph restriction would be supported by appropriate consultation and public engagement.</p> <p>The quality of life and community benefits are clearly set out within the Circular 01/13. The draft policy sets out at paragraph 5.1 that a Wiltshire Policy should not deviate from the guidance given in Circular 01/13. As such the policy does not seek to repeat all the information set out in the guidance. Rather the two documents should be read together.</p> <p>See response to substantive comments</p> <p>See response to substantive comments</p> <p>The quality of life and community benefits are clearly set out within the Circular 01/13. The draft policy sets out at paragraph 5.1 that a Wiltshire Policy should not deviate from the guidance given in Circular 01/13 and is cross referenced to it. As such the policy does</p>

		<p>There appears to be some confusion about the current DfT guidance (01/2013). The policy as drafted only considers 20mph limits when mean 'before' speeds are at or below 24mph, but the DfT guidance suggests that the appropriate speed limit be set and then engagement with the public take place in order to achieve compliance if inappropriate speed is still an issue.</p> <p>We believe that the policy should have been subjected to public debate before being introduced and it is not acceptable for it to be brought forward as a delegated decision by a Cabinet member.</p> <p>If this had been formulated with more of the funding from the Integrated Transport Budget made available then a much more visionary policy could have been considered.</p> <p>Reduction in speed is widely supported in urban residential areas and in villages. In order to properly achieve a main component of a move towards modal shift (safe routes and healthier lifestyles) and to get the public on board with a policy which better reflects public opinion as well as the latest government guidance, we believe that this policy is not sufficiently robust, far ranging and inclusive. It should be reworked to reflect all the requirements beyond mere collision or casualty rates.</p>	<p>not seek to repeat all the information set out in the guidance. Rather the two documents should be read together.</p> <p>24mph threshold – See response to substantive comments</p> <p>Public consultation has been achieved through the Cabinet Member delegated decision making process. It is not understood how a public debate would have been any different to this.</p> <p>Budget matters – See response to substantive comments</p> <p>The draft policy is considered to be robust and substantially compliant with the DfT guidance. It seeks to introduce 20mph restrictions into those areas where the benefits that arise are real, measurable and true and not just done for populist reasons or political gain.</p>
C34	Sustrans	<p>Thank you for the opportunity to comment on the proposed policy. In principle Sustrans supports the implementation of 20mph limits and zones across all settlements to encourage greater levels of cycling and walking. Wiltshire's commitment to increasing the use of 20mph limits and zones is welcomed but the policy it does not go far enough. Sustrans would welcome a policy which recognises the potential for town-wide traffic calming to change the way people travel across Wiltshire's towns. Without such an approach the scope for achieving a significant change from car use to walking and cycling is very limited. We would like to make the following specific observations on the report:</p> <p>5.2 – Limiting the implementation of 20mph to roads where the movement of motor vehicles is not the primary function will prevent Wiltshire Council from providing comprehensive cycle networks in every town. The main arterial routes into town centres currently carry heavy volumes of traffic, with mean speeds below 30mph. In many towns there is no scope to provide traffic-free cycle routes in these locations, therefore on-carriageway approaches to the town centres need speed reduction measures to encourage more trips by bike. Examples include Bath Rd in Melksham, New Rd in Chippenham and Market Place in Warminster. The current drafting implies that these locations will not be considered and contradicts the guidance quoted from circular 01/13.</p> <p>5.3 – As explained above, 20 mph zones are a valuable tool in promoting walking and cycling. Therefore, the case for them should not just be based on safety.</p>	<p>Paragraph 84 of Circular 01/13 sets out those areas where 20mph speed limits and zones are appropriate. Paragraph 90 and Table 1 of Circular 01/13 state that 20 mph limits and zones should only be used where motor vehicle movement is not the primary function.</p> <p>Comment noted.</p>

		<p>5.3 – Sustrans can provide case studies of where 20mph zones have been retro-fitted into existing streets as part of our DIY Streets programme. This is a very successful way of improving safety and quality of life in communities. The implementation of 20mph zones should not be restricted to new estates.</p> <p>5.3 – The requirement for a suitable alternative for drivers to avoid 20mph zones is very restrictive. In instances where there is a case for engineered speed reduction on distributor roads, such as Pewsham in Chippenham or West Warminster, the council will be unable to implement 20mph zones to create safe links within communities. The drafting contradicts the guidance quoted from circular 01/13.</p> <p>6.2 - By limiting communities to two proposed location per year the council is creating a reactive policy and piecemeal implementation. The council should be prepared to implement on a wider scale to support its own policy objectives.</p> <p>7.2 – The council should be prepared to use Local Transport Pot funding and other sources for the implementation of 20mph limits and zones. Reliance on Area Board and CATG funding will ensure many communities have to wait a long time to see implementation. It implies that the council see no strategic value to the implementation of 20mph limits and zones.</p>	<p>The draft Wiltshire policy does not only limit 20mph restrictions to new estates.</p> <p>It is not considered that the drafting contradicts the guidance. Paragraph 90 sets out those areas suitable for 20mph zones and states that 'they should not include roads where motor vehicle movement is the primary function'. The examples given are distributor roads that by definition have a primary function of vehicle movement.</p> <p>See response to substantive comments</p> <p>See response to substantive comments</p>
C35	Cheverell Magna Parish Council	<p>Our comments are based on study of Circular 01/13 and experience as a trial village for a 20 mph speed limit. We believe that the Wiltshire Policy is more restrictive than intended by the guidance contained in Circular 01/13. In particular, the latter is more encouraging (paragraphs 12 and 92) and suggests a wider number of criteria to be taken into account when considering a 20 mph speed limit or zone (paragraph 30).</p> <p>Under the proposed Wiltshire Policy, Great Cheverell would not have been considered for a 20 mph limit, yet we have already benefited from reduced speeds and expect greater benefits over time, as 20 mph schemes become more commonplace nationally and driver behaviour adapts accordingly.</p> <p>For the sake of other communities in Wiltshire and to ensure that our village is not such a rarity that the 20 mph limit is ignored and undermined, we would ask for some amendments to the draft document as follows:</p> <p><b>Paragraphs 2.1 to 2.3.</b> These paragraphs imply that the implementation of 20 mph zones in Wiltshire will follow past practice, with the associated problems and costs, without reference to the signage and other changes made in 2012. We believe there should be reference to these arrangements in the Wiltshire policy, because they reduce the requirements for signing and traffic calming, thereby facilitating the introduction of 20 mph zones and reducing the cost involved</p> <p><b>Paragraph 2.4.</b> Circular 01/13 refers to 'before' mean speeds of 24 mph or less as a guide; they are not mandatory. We therefore suggest an amendment to paragraph 2.4 of the policy to read: '...the current guidance from the DfT (01/13) suggests that, as a general rule, they should be considered for use on roads where</p>	<p>The changes made to national regulations with regard to signing of 20mph zones are well understood by the council. There is no reference to past practise or problems with 20mph zones in these paragraphs. The paragraphs state that each zone will vary in detail and as such will be tailored to the location and specific circumstances.</p> <p>See response to substantive comments</p>

		<p>mean speeds are already 24 mph or less.'</p> <p><b>Paragraphs 5.1 to 5.3.</b> As the proposed policy states: '...it is considered that a Wiltshire Policy should not substantially deviate from that contained in Circular 01/13,' we believe that paragraphs 5.2 and 5.3 should be expanded to reflect more fully the DfT guidance given in paragraphs 30 and 84 of that Circular. There should therefore be reference to all the important factors listed in paragraph 30 to be considered in determining a 20 mph limit or zone: history of collisions (including frequency, severity, types and causes); road geometry and engineering; road function (strategic, through traffic, local access etc); composition of road users (including existing and potential levels of vulnerable road users); existing traffic speeds ; and road environment, including level of roadside development and possible impacts on residents e.g. severance, noise or air quality.</p> <p><b>Paragraphs 5.2 and 5.3</b> (criteria for considering 20 mph limits and zones) should also be broadly similar, treating rural and urban communities more equally and reflecting paragraph 84 of Circular 01/13 where traffic authorities are empowered to introduce 20 mph speed limits or zones on...'Residential streets in cities, towns and villages, particularly where the streets are being used by people on foot and on bicycles, there is community support and the characteristics of the street are suitable.'</p> <p><b>Paragraph 5.2.</b> While it is correct to write that roads to Category 4B may be typically considered suitable for a 20 mph limit, Circular 01/13 does not preclude consideration of other roads, Category 4A and above, where other factors (road geometry, vulnerable road users, collision history etc.) may be important. Great Cheverell is on a category 4A road where we believe there are already benefits from the 20 mph limit, even before the publicity/education we plan to make it more effective.</p>	<p>The draft policy sets out at paragraph 5.1 that a Wiltshire Policy should not deviate from the guidance given in Circular 01/13 and is cross referenced to it. As such the policy does not seek to repeat all the information set out in the guidance. Rather the two documents should be read together.</p> <p>Cross reference to paragraph 84 of the Circular is already included in paragraph 5.3 of the draft policy. It is accepted that this cross reference should also be included at paragraph 5.2 to aid ease of understanding.</p> <p>See response to substantive comments</p>
C36	Cricklade CSW group	<p>As CSW volunteers we therefore wished to make a representation to this consultation based on our joint experience. We have done so by commenting in response to several of the questions set out in Appendix B of the document "WILTSHIRE POLICY ON 20 MPH SPEED LIMITS AND ZONES" provided for consultation. <a href="#">Specific Points</a></p> <p><b>Q1. How effective are 20mph speed limits in reducing actual vehicle speeds?</b> Cricklade CSW volunteers agree with the answer given that the limit has made little if any difference to speeds along the roads in Cricklade Town Centre.</p> <p><b>Q3. What are the benefits of 20mph limits?</b> Cricklade CSW volunteers disagree with the statement that "quality of life and community benefits can be accrued". We have no evidence of this. On the contrary the limited traffic calming measures introduced alongside the 20mph limit are perceived to have increased driver frustration, may have been a contributory factor in some accidents (fortunately without serious injury), yet these measures have left many residents and pedestrians equally angry and frustrated that greater</p>	<p>Comment noted</p> <p>Comment noted</p>

		<p>benefits in speed reduction have not materialised. The hope was that a 20mph limit would enable actual speed to be capped at 30mph as it is understood that tolerances apply to speed enforcement. A speed of 30mph would be 50% above the mandatory limit and so could be the subject of enforcement. The lack of any meaningful enforcement means the new limit is invariably disregarded, many vehicles continue to drive in excess of 30mph and those motorists who do seek do abide by the 20mph limit are the subject of intimidation including unsafe overtaking by other drivers.</p> <p><b>Q5. Will 20mph limits mean the introduction of road humps or other forms of traffic calming?</b> Cricklade CSW volunteers believe that without the associated traffic calming measures the 20mph limit in Cricklade would be totally ineffective. However what is desired by residents, (as set out in the Cricklade Town Plan following community consultation) is the enforcement of a 20mph limit, without the placing of restrictions to traffic flow. The answer is perceived to be speed cameras/SIDs working 24/7 acting as a permanent deterrent, not traffic calming.</p> <p><b>Q9. Will a 20mph limit / zone be enforced by the Police?</b> Cricklade CSW volunteers welcome and wholeheartedly support a change in police policy to enforce 20mph limits. Failing to do so brings the law into disrepute.</p> <p><b>Q10. Can Community Speed Watch (CSW) operate in areas covered by 20mph limits?</b> Cricklade CSW volunteers would welcome the opportunity to expand their activity into the 20mph limit since this is where most residents perceive the greatest problem to be present. However to maintain volunteer commitment we view it as essential that greater support and enforcement is provided, preferably speed cameras or SIDs backed up by more regular police support issuing tickets to offending drivers.</p> <p><b>Q11. Can the temporary Speed Indication Device (SID) be deployed in a 20mph limit / zone?</b> Cricklade CSW volunteers understand that Cricklade Town Council budgeted for SIDs in the past, but their deployment within the Town has been prevented by Wiltshire Council. As volunteers if this is true we deplore this policy stance, as those of us who are motorists do take notice of SIDs when we drive even if these are permanent, and they are a more efficient and effective way to remind motorists of their speed than CSW can ever be.</p> <p><b>Q14. How can you tell if a newly implemented 20mph limit has been successful?</b> A14. <i>We will undertake ongoing monitoring.</i> Cricklade CSW volunteers are unaware of what monitoring has been done on the effectiveness of the 20mph limit in Cricklade. We would be grateful for more</p>	<p>Enforcement – see response to substantive comments</p> <p>Enforcement - see response to substantive comments</p> <p>Enforcement - see response to substantive comments</p> <p>Enforcement - see response to substantive comments</p> <p>SID's can be deployed in 20mph restrictions</p> <p>No monitoring of the Cricklade 20mph limit has been undertaken to</p>
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	<p>information on exactly what monitoring has been done and what constitutes "success".</p> <p><b>Q15. Will 20mph simply lead to increased delays to traffic and driver frustration?</b>  <i>A15. By carefully choosing the areas for 20mph restrictions additional delays to motorists are not anticipated.</i>  Cricklade CSW volunteers are dumbfounded by this statement. Speeding traffic is a major issue in residential communities and speed limits are introduced to protect residents and pedestrians from excessive speed. If the speed of traffic is restricted below its "natural" level by a speed limit then by definition this will lead to delays to a journey compared with not having the limit in place. Motorists should either find an alternative route or accept the compromise of a slight delay in their journeys caused by sharing space with residents in a community. Residents should be entitled to a quality of life that is not compromised by traffic travelling at excessive speed.</p> <p><b>Q16. You are only allowing 20mph limits in streets where average speeds are already below 24mph – what's the point?</b>  <i>A16. Whilst further speed reduction is likely to be small, the presence of the limit is likely to bring about an overall change in driver attitude and introduce positive community benefits.</i>  Cricklade CSW volunteers would like to see the evidence that justifies this opinion, as we have observed no change in driver attitude and no positive community benefit from the introduction of the 20mph limit in Cricklade.  We believe driver attitude would change and material community benefit would accrue from enforcement of the 20mph limit.</p> <p><u>Summary</u>  Cricklade CSW volunteers are fully supportive of the 20mph limit in Cricklade Town Centre, and believe its poor effectiveness is caused by the total lack of enforcement.</p> <p>Whilst we would welcome the opportunity to provide CSW monitoring within the 20mph limit area which is at present denied us, we believe this can only be part of a solution which includes SIDs, speed cameras and the occasional police presence and does NOT rely on further physical traffic calming. We do not believe this combination could be considered "excessive enforcement" but is rather a reasonable attempt to make drivers realise they are driving through a community where people live, work, shop and spend their leisure time and that speeding traffic is not only dangerous but intimidating. The objective is to achieve the freeflow of traffic at low speed, not the stop-start frustration and potential dangers created by physical obstructions.</p> <p>In denying other similar communities the opportunity to have 20mph limits the policy balance between the quality of life of residents and the need for the faster flow of traffic appears unfairly weighted in favour of traffic. There is no</p>	<p>date.</p> <p>20mph limits introduced into those areas where speeds are already at or close to 24mph will typically result in a 1mph reduction in speed. Such a small level of speed reduction is thought unlikely to result in increased journey time or driver frustration.</p> <p>The village 20mph trial sites have been subject to after surveys of residents to assess their views. The results of this show a generally positive feedback.</p> <p>Comment noted</p> <p>Enforcement - see response to substantive comments</p> <p>See above comments</p>
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		quantification of the economic cost (if any) of better forcing vehicles to move more slowly through the town of Cricklade and if this should be considered reasonable in comparison with the improved quality of life that would result for its residents and visitors.	
<b>C37</b>	Resident of Bradford on Avon	<p>We believe that the draft policy does not go far enough, and that a real opportunity would have been missed if this policy is approved as is.</p> <p>We believe that the draft policy is not sufficiently ambitious in scope given DfT guidance and the strength of growing public support for 20mph limits. The criteria proposed for considering 20mph limits are narrow compared to those within the DfT guidance, omitting several environmental and community criteria, and also including two criteria (mean speed and road function) that would preclude many residential streets and areas of Bradford on Avon.</p> <p>We feel that wide area 20mph limits would be the most effective approach, especially when combined with appropriate publicity / education and light touch engineering, as proven in other local authority areas. Although it is mentioned in the policy that area wide limits will be considered, detail around this is lacking.</p> <p>In particular, we (as well as many others) have aspirations for a town wide 20mph limit for Bradford on Avon; however, unfortunately this policy as it stands would not support this aspiration.</p>	<p>The quality of life and community benefits are clearly set out within the Circular 01/13. The draft policy sets out at paragraph 5.1 that a Wiltshire Policy should not deviate from the guidance given in Circular 01/13 and is cross referenced to it. As such the policy does not seek to repeat all the information set out in the guidance. Rather the two documents should be read together.</p> <p>Area wide 20mph limits are not precluded within the draft policy.</p> <p>A town wide 20mph limit covering all roads is impractical and would not be in compliance with DfT guidance. Paragraph 84 of Circular 01/13 sets out those areas that are considered suitable for 20mph restrictions. Paragraph 90 and Table 1 of Circular 01/13 state that 20 mph limits and zones should only be used where motor vehicle movement is not the primary function. Radial routes into the town centre (Bradford Road, Frome Road, Winsley Road etc) and internal distributor roads (Moulton Drive, Springfield etc) would not be suitable. However other areas of the town, predominantly the residential areas are highly likely to be suitable and could be subject to area wide 20mph limits.</p>
<b>C38</b>	Wiltshire Councillor	<p>In general a more positive approach should be taken to the introduction of 20mph limits where supported by local communities. More emphasis should be given to the benefits. WC should also consider more carefully the economic benefits to be gained, not just to the council directly but also to the wider community.</p> <p>Specific points: para 4 states that a separate review and separate report is to be produced on 20mph limits outside schools. It would be more sensible to have a single policy document covering all aspects of 20mph limits and zones including outside schools. Roads near schools are not separate from the rest of the road network and this would make options for communities clearer.</p> <p>para 7 says Public Health Implications are not applicable. The introduction of 20mph zones impacts on public health in a number of ways such as casualty reduction and an increase in walking or cycling. There may also be an impact on</p>	<p>Comment is noted. However the Council has for many years had a policy on speed limits outside schools and this is currently subject to separate review. In the future it may be possible to combine the policies.</p> <p>This is a reference to the covering report not the policy itself. The quality of life and community benefits are clearly set out within the Circular 01/13. The draft policy sets out at paragraph 5.1 that a</p>



		<p>air pollution: the possibility of using 20 limits as part of Air Quality Management Schemes in designated areas should be considered. The council's public health department should be involved in developing the 20mph policy.</p> <p>WC draft policy document is less positive re introduction of 20 limits than the DFT circular on which it should be based. Much prominence has been given to para 132 and less to other parts of the circular (eg paras quoted below) which allow a more flexible approach. The inclusion of the network hierarchy map within the policy is unnecessary and demonstrates an over-prescriptive approach. For example a village such as Holt, although on a category 3 road, would benefit from a 20 limit, would fit other criteria, and could demonstrate community support. It's not clear what's meant by reference in the circular to roads where the movement of motor vehicles is or is not the primary function. A more common-sense approach, with each stretch of road where residents support a 20 limit being considered on its own merits, would be preferable. The statement that only roads to category 4b can be considered does not fit with the guidance and is unduly negative and prescriptive.</p> <p><i>Examples of points from DFT circular 01/2013 Setting Local Speed Limits which encourage a more flexible policy:</i></p> <p><i>Introduction: Traffic authorities are asked to keep their speed limits under review with changing circumstances, and to consider the introduction of more 20 mph limits and zones, over time, in urban areas and built-up village streets that are primarily residential, to ensure greater safety for pedestrians and cyclists, using the criteria in Section 6.</i></p> <p><i>Para 17: The key objectives of this guidance are ... achieving local speed limits that better reflect the needs of all road users, not just motorised vehicles</i></p> <p><i>Para 23: Local residents may also express their concerns or desire for a lower speed limit and these comments should be considered.</i></p> <p><i>Para 32: Speed management strategies should seek to protect local community life.</i></p> <p><i>Para 34: ... evidence suggests that when traffic is travelling at constant speeds, even at a lower level, it may result in shorter and more reliable overall journey times, and that journey time savings from higher speed are often overestimated (Stradling et al., 2008).</i></p>	<p>Wiltshire Policy should not deviate from the guidance given in Circular 01/13 and is cross referenced to it. As such the policy does not seek to repeat all the information set out in the guidance. Rather the two documents should be read together.</p> <p>Paragraph's 90 and 132 and Table 1 of Circular 01/13 state that 20 mph limits and zones should only be used where motor vehicle movement is not the primary function. It is considered that roads of category 4b are likely to be the most suitable for successful 20mph restrictions. In the example given of Holt the primary function of the road (B3107) through the village is that of vehicle movement. Regardless of the class of road it is highly unlikely that this location would be suitable for a 20mph restriction and overall compliance levels are likely to be extremely low.</p> <p>This is what the draft policy sets out to do.</p> <p>Paragraphs 17,23,32 and 34 refer to all levels of speed limit not just 20mph restrictions. Wiltshire Council has reviewed all its speed limits A and B class roads in 2009 and is shortly to complete the on ground changes of the review. Further through the CATG's there is the opportunity to review limits on the C and Unclassified network in response to concerns and desires raised by local residents.</p>
C39	Friends on Woolley, Bradford on Avon	<p>Friends of Woolley (FoW) welcomes the adoption of a robust and fit for purpose policy for the introduction of 20mph limits.</p> <p>However, FoW has a number of reservations around the draft policy currently</p>	

		<p>under consultation:</p> <p><b><u>Priorities for Woolley</u></b></p> <ul style="list-style-type: none"> <li>The policy is not sufficiently ambitious in scope given DfT guidance and the strength of public support for 20mph limits. DfT guidance supports a wider approach and other local authorities have adopted this.</li> <li>We are disappointed that the proposed policy will limit potential sites to only 2 sites per year: we feel that this will not deliver the community improvements that a broader implementation could achieve. DfT 01/13 appears to be actively promoting local authorities to consider more 20 mph limits and zones, and as a matter of priority: we do not feel that the proposed 2 sites per year really fits in with this guidance. We would urge that Wiltshire Council considers broadening the policy to support area wide implementations.</li> <li>We are also disappointed that funding will be limited to the Area Board/CATG budgets, and will not make use of wider transport budgets or budgets from other sources. We would urge that Wiltshire Council does consider wider funding sources for the implementation of wide area 20mph limits within the proposed policy.</li> </ul> <p><b><u>General comments</u></b></p> <ul style="list-style-type: none"> <li>The draft policy only considers 20 mph limits when mean before speeds are at or below 24mph. However, the DfT guidance appears to suggest that an appropriate speed limit should be set and other measures (such as publicity, education etc) could then be used to gain compliance if inappropriate speed continues to be an issue. This suggests that the proposed approach could be reversed, thus implementing a 20mph speed limit according to the local conditions, and then improving compliance (if needed) by measures such as publicity, education and the Community Speedwatch initiative.</li> <li>Re. section 5.2 'On roads that do not have a strategic function or where the movement of motor vehicles is not the primary function.' We consider that DfT 01/2013 does not preclude 20mph limits for roads with a current average speed limit greater than 24mph, or those roads that are primary routes or that have a strategic function.</li> <li>DfT 01/13 appears to suggest that there are indeed benefits to applying 20 mph speed limits on roads where existing mean speeds are greater than 24 mph.</li> <li>The report implies that 20mph zones and limits have 'potentially limited outcomes'; however DfT 01/13 refers to 'a generally favourable reception</li> </ul>	<p>Comment noted</p> <p>See response to substantive comments</p> <p>Area wide implementations are included in the draft policy.</p> <p>See response to substantive comments</p> <p>The Circular advises that all 20mph limits need to aim for compliance with the new limit and that there should be no expectation on the police to provide additional enforcement to ensure compliance. The Circular further advises that as average speed reductions through sign only limits are on average 1mph, introducing 20mph limits on those roads with speeds above 24mph is likely to be insufficient to make the resulting speeds generally compliant with the new 20mph limit.</p> <p>It is accepted that where 'before' mean speeds are marginally above 24mph, the introduction of 20mph limits in conjunction with lighter or soft touch engineering measures is likely to result in general compliance. As such it is fully expected that a degree of flexibility will be required in determining whether a 20mph restriction can be introduced. However where overall average speeds are higher, reliance on light touch engineering measures, publicity and education in order to achieve compliance is likely to be unrealistic, especially in the long term. As a result the wider community benefits so often associated with 20mph restrictions are also unlikely to occur thereby resulting in long term community dissatisfaction.</p> <p>The reference to limited outcomes refers to the likely level of actual</p>
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		<p>from local residents'.</p> <ul style="list-style-type: none"> <li>The policy appears to take a narrow view on the potential factors that should be taken into account in setting a 20mph limit, namely mean 'before' speeds, strategic road function and a rural – village location. In our view, there are many more factors that should be considered: collision / casualty reduction; conditions and facilities for vulnerable road users; impacts on pedestrians and cyclists; congestion and journey time; environmental; community and quality of life impact (as borne out by text within DfT 01/13).</li> </ul> <p>As such, FoW supports the introduction of a town wide 20mph limit implementation for Bradford on Avon.</p> <p>We feel that an area wide approach is supported by the DfT guidance (in terms of implementation on roads with mean speeds above 24mph and those with a 'strategic' function, and factors that should be considered etc), but is not currently supported by Wiltshire Council's draft policy.</p> <p>We request that the draft policy is updated to consider area wide implementations that include roads that may have a 'strategic' function and mean speeds greater than 24mph, and also to expand on the factors that will be taken into account when setting a 20mph limit.</p> <p>Notwithstanding this, in the answer to question 8 of the Q&amp;A section, it is stated that 'Area wide limits will be considered as part of the adopted process': we would request that this point is clarified and expanded.</p> <p>We believe that this town wide approach would be more effective in meeting the aspiration of safer and calmer streets (with the resultant benefits of improved pedestrian and bicycle usage, improved mobility etc) than a piecemeal approach.</p> <p><b><u>Comments on Q&amp;A section</u></b></p> <p>FoW have the following comments regarding specific questions in the Q&amp;A section:</p> <ul style="list-style-type: none"> <li>Q2. However, any degree of compliance however low would have a positive benefit.</li> <li>Q3. Although not easily quantifiable, the importance of these benefits cannot be underestimated.</li> <li>Q8. This statement needs expanding.</li> </ul>	<p>speed reduction achieved with stand alone limits</p> <p>The quality of life and community benefits are clearly set out within the Circular 01/13. The draft policy sets out at paragraph 5.1 that a Wiltshire Policy should not deviate from the guidance given in Circular 01/13 and is cross referenced to it. As such the policy does not seek to repeat all the information set out in the guidance. Rather the two documents should be read together.</p> <p>Paragraph's 90 and 132 and Table 1 of Circular 01/13 state that 20 mph limits and zones should only be used where motor vehicle movement is not the primary function</p> <p>See response to substantive comments</p> <p>A town wide 20mph limit covering all roads is impractical and would not be in compliance with DfT guidance. Paragraph 84 of Circular 01/13 sets out those areas that are considered suitable for 20mph restrictions. Paragraph 90 and Table 1 of Circular 01/13 state that 20 mph limits and zones should only be used where motor vehicle movement is not the primary function. Radial routes into the town centre (Bradford Road, Frome Road, Winsley Road etc) and internal distributor roads (Moulton Drive, Springfield etc) would not be suitable. However other areas of the town, predominantly the residential areas are highly likely to be suitable and could be subject to area wide 20mph limits.</p> <p>Comment noted</p> <p>Comment noted</p> <p>Comment noted</p>
C40	9 No Residents of Bradford on Avon	I am writing with regard to the current Wiltshire County Council consultation on the draft policy for 20 mph speed limit zones. I wish to raise my concern in relation to	

		<p>the content of this draft policy, which is out of kilter with Government guidance in DfT 01/13 and even misrepresents government guidance/wording and criteria. I refer you to a full critique of the failings of this policy undertaken by Rod King MBE of 20s Plenty for Us (<a href="http://www.20splentyforbradford-on-avon.moonfruit.com/Critique_20mph_BOA.pdf">www.20splentyforbradford-on-avon.moonfruit.com/Critique_20mph_BOA.pdf</a>). I have included some of my main concerns in this respect below.</p> <p>I also wish to flag that the consultation process itself also represents bad practice, being run over the summer holiday period with little awareness raising with the general public, under the 8 week stipulated period.</p> <p>Wiltshire's proposed policy on 20 mph speed limits and zones lacks ambition and vision at a time when the benefits of 20mph limits and zones are being increasingly recognised. Other local authorities have been quick to spot the benefits of introducing area-wide 20 mph limits as a default on residential streets with minimal exceptions, and some 12.5 million people already live in Local Authorities where this decision has been taken.</p> <p>A relevant neighbouring example is Bath and North East Somerset who agreed in April 2012 to allocate £500K of their transport budget to a 2 year delivery programme which would implement 20mph speed limits on their residential streets, subject to public consultation and completion of statutory processes.</p> <p>Particular concerns with Wiltshire's policy include the following:</p> <ul style="list-style-type: none"> <li>• The policy looks quite narrowly at the use of speed limits, focusing on existing speeds and signage. It fails to consider the need for public engagement, education and publicity which also need to be part of the package which will inform the public of the need and benefits of lower speeds.</li> <li>• The notion that appropriate speed limits can somehow be 'rationed' to a maximum of two locations per Area Board per annum [proposed policy para 6.1-6.2] is not consistent with the statutory responsibility to set appropriate speed limits for all roads.</li> <li>• The funding for implementation of 20 mph limits is restricted to funding already allocated to Community Area Transport Groups [proposed policy para 7.2]. This is only a small proportion of the integrated transport budget which central government makes available to Wiltshire Council each year. Other local authorities are finding a wide range of sources of funding including from Public Health, Section 106 and development funds, Local Sustainable Transport fund etc.</li> <li>• The wider benefits which accrue from 20 mph limits and zones – in terms of lower noise, a safer environment for healthier active travel, greater mobility for children and the elderly and a better and safer built environment have not been adequately considered.</li> </ul>	<p>The consultation process does not represent bad practice. A Cabinet Member decision is normally available for a 10 day consultation period. The consultation period for the draft 20mph policy was extended to 8 weeks to allow full public comment to be made. All Parish and Town Councils were notified of the opportunity to comment via the Area Board /CATG mechanism.</p> <p>Area wide implementations are included in the draft policy</p> <p>The way in which BANES have decided to implement and fund 20mph restrictions is of no material consideration in determining a policy for use in Wiltshire.</p> <p>The quality of life and community benefits are clearly set out within the Circular 01/13. The draft policy sets out at paragraph 5.1 that a Wiltshire Policy should not deviate from the guidance given in Circular 01/13 and is cross referenced to it. As such the policy does not seek to repeat all the information set out in the guidance. Rather the two documents should be read together.</p> <p>See response to substantive comments.</p> <p>See response to substantive comments.</p> <p>The quality of life and community benefits are clearly set out within the Circular 01/13. The draft policy sets out at paragraph 5.1 that a Wiltshire Policy should not deviate from the guidance given in Circular 01/13 and is cross referenced to it. As such the policy does not seek to repeat all the information set out in the guidance. Rather the two documents should be read together.</p>
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C41	Resident on Bradford on Avon	<p>I have already sent you my views on Wiltshire's Draft policy regarding 20 mph limits and zones. However I feel that I need to write again, particularly after attending the Bradford on Avon Area Board meeting on Wednesday, that I am very concerned that Wiltshire seem to be missing the point about the new DFT guidance. There seems to be a fixation with implementing zoned areas at considerable cost and confined, specific maybe even spurious benefit to just a few. Admittedly this is better than nothing, but I would have thought that 'better than nothing' is not a very dynamic and forward thinking stance for Wiltshire to be taking.</p> <p>The bigger picture is that highways are for a multitude of users; pedestrians, cyclists, wheelchair users, pedestrians with buggies and young children, elderly pedestrians, dogs and dog walkers, horse riders as well as motorists. This was made very clear in the presentation from Allan Parker about the Westwood 20 mph Speed Limit Trial. The community responded very positively to the trial and the over riding message seemed to be one of safety. People felt safe.</p> <p>Numerous cities throughout the UK, including Bristol and Bath locally, have adopted a city wide limit. The evidence is that motorists slow down, journey times aren't affected detrimentally and non motorist highway users feel safer. This impacts upon active travel and people are more likely to feel safe cycling and walking. This then has an impact on people's health and emissions from cars etc. I was particularly concerned that Cllr Ian Thomson mentioned 20 mph zones just outside schools. Again this is a start, but evidence shows that few accidents involving school children happen just outside the school and only 20% of child road casualties happen on the way to or from school. Please see this article from 20s Plenty:</p> <p>How School Safety Zones are not a priority when children need a community wide 20mph speed limit!! Briefing sheet on why 20mph School Safety Zones can have minimum impact on child road safety and will encourage inactive travel to school. On the face of it, having a 20mph speed limits around a school entrance seems an sensible idea. However, a closer inspection may lead us to a very different conclusion First some background and key facts :-</p> <ul style="list-style-type: none"> <li>• Only a small minority of child road casualties occur on the way to or from school (Just 20%).</li> <li>• Very few casualties occur outside the school itself.</li> <li>• The mean radius of school safety zones is just 300m, yet the mean distance travelled to school is 1.8km.</li> </ul> <p>Hence the school safety zones apply to only 17% of the journey.<sup>2</sup></p> <ul style="list-style-type: none"> <li>• At exit gateways to school safety zones drivers are reminded of an increase in speed limit to 30mph.</li> </ul> <p>So why are we so pre-occupied with school safety zones if children are most likely to be casualties on the rest of the road network where there are higher speed</p>	<p>All comments are noted</p> <p>Wiltshire Council and before that Wiltshire County Council has had a long standing policy on the use of speed limits outside schools. This Policy was based on independent work done by the Transport Research Laboratory and was adopted in 2003. Given the time elapsed since the approval of the policy and in recognition of the changes made at national level over the use of part time 20mph limits consultants Atkins have recently been commissioned to review the policy to ensure that it reflects current best practice. The views expressed by this correspondent will be made available to Atkins so they are aware.</p>
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		<p>limits, and when they are not on the way to or from school?  Well the answer is for most of us when looking at the issue we see most children around schools and presume that this is where the danger is. And of course for parents driving their children to school it is the part of the journey when they feel most out of control when their children get out of the car. For them a school safety zone improves safety for 100% of their child's pedestrian journey from the car to the school. Hence it is seen as desirable by school-run parents.  But what of the child who walks or cycles all the way from their home to school. The school safety zone now only works for 17% of their journey. For drivers isolated 20mph school safety zones reinforce and legitimise driving at faster speeds outside of the immediate school location, hence increasing the risk to pedestrian and cycling children.  Whilst school safety zones do minimally increase safety around schools it has a negative effect on safety for children walking or cycling to school outside of those zones. Their biggest disadvantage is that they can lead parents and highway authorities to believe that they have "fixed the problem" of child road safety. Instead of focussing on school safety zones we should be ensuring that children are given better conditions for walking and cycling for the whole route from their home to school. That can best be achieved by deploying a low- cost Total 20 policy which makes 20mph the default for residential and urban roads including those around schools. For the same cost as a school safety zone you can cover 50 times the number of surrounding streets with a wide area 20mph limit.  It's time to recognise that we need community-wide safety for children and not just in the last 100m of their school journey.</p> <p>Perhaps this might also help with the re-think of the Wiltshire draft policy: <a href="http://bit.ly/17Sotvl">http://bit.ly/17Sotvl</a> Even London has now woken up and smelt the coffee.</p> <p>It's happening all over the country and Wiltshire is being left behind.</p>	
C42	Resident of Bradford on Avon	<p>I object to the Council's draft policy and consider it unsound and unreasonable. The policy does not conform with Government policy in DfT Circular 01/13 and needs significant redrafting to bring it into line with government policy – for the following reasons:</p> <p>a. <b>Government policy is to positively encourage as a priority: whereas WCC's draft policy is negatively worded and works against 20mph restrictions.</b> Circular 01/13 asks local traffic authorities 'to consider the introduction of more 20 miles per hour limits and zones, over time, in urban areas and built-up village streets that are primarily residential, to ensure greater safety for pedestrians and cyclists, using the criteria contained in this guidance'. It is couched in very <b>positive terms</b> – under 'Priorities for Action' (sections 11 and 12) it states 'traffic authorities are asked to ...consider the introduction of more 20 mph limits and zones, over time, in urban areas and built-up village streets that are primarily residential, to ensure greater safety</p>	This is what the Policy does

		<p><i>for pedestrians and cyclists</i>'. Yet WCC's draft policy is <b>negatively worded</b> and in paragraph 6.1 includes some anecdotal hearsay or personal officer prejudice about 'limited benefits' and a plateauing of interest from communities : its staggering that such officer bias – completely without evidence or justification – can find its way into Council policy in this way. This should be deleted and replaced with the positive content enshrined in Circular 01/13. This negative approach, including the mistaken and misleading interpretation of 01/13 as detailed below, will fail to effectively deliver 20mph schemes in Wiltshire in the way in which Government is directing: <b>this makes the draft policy unsound in planning terms.</b></p> <p>b. <b>WCC's draft policy seriously misleads and misquotes Circular 01/13.</b> Paragraph 2.4 is strongly misleading in that it misrepresents and misquotes government policy to the public. WCC's draft policy states that: '<i>DfT (01/13) suggests they [20 mph limits] should only be considered for use on roads where mean speeds are already 24 mph or less and where the layout and character of the road gives a clear indication to drivers that a lower speed is appropriate</i>'. Whereas, DfT (01/13) actually states: '<i>Signed-only 20 mph speed limits are therefore most appropriate for areas where vehicle speeds are already low</i>'. Therefore the policy is flawed as it has misrepresented government policy. DfT do not preclude 20 mph speed limits on roads where the mean speeds are already more than 24 mph: Wiltshire's policy clearly does. This is a significant point in relation to safety on our roads for our children and other pedestrians and cyclists. DfT 01/13 clearly states that there are benefits to applying 20 mph speed limits on roads where existing mean speeds are greater than 24 mph, citing the evidence from Portsmouth where in such cases '<i>the reductions in average speed tended to be greater [than 1 mph]</i>'. In fact, DfT's own evaluation of the Portsmouth scheme found an average reduction of <b>6.3mph</b> where 20mph signs were introduced on roads with an original average speed of greater than 24mph. A greater reduction in mean speeds will clearly save more lives – this is clearly as, or more important, as a policy goal/benefit (or success factor) that plain compliance with a speed limit. Presumably this is why DfT 01/13 leaves this option open to councils. Para 13 of 01/13 states that for every 1mph reduction in average speeds, collision frequency reduces by around 5%.</p> <p>c. <b>The criteria applied by WCC draft policy do not conform with those recommended by Government guidance.</b> In its introduction (Section 1 'Key Points' and para 12, Circular 01/13 clearly states that traffic authorities 'introduce more limits ... using the criteria set out in Section 6'. Section 6 states that 'it is important the full range of options and their benefits and costs before making a decision'. Para 31 of 01/13 (and para 84, Section 6) lists the factors that the Council should take into account in terms of changing speed</p>	<p>The comment to limited benefits is a reference to the likely level of actual speed reduction achieved with limits and is based both on Wiltshire's own trial sites findings and those achieved nationally. The policy is not negatively worded but seeks to introduce 20mph restrictions into those areas where the benefits that arise are real, measurable and true and not just done for populist or political gain.</p> <p>It is not considered that the draft policy is misleading. The sentence used by the respondent is contained in paragraph 95 of the Circular. This paragraph goes on to say '<i>If the mean speed is already at or below 24mph on a road, introducing a 20mph speed limit is likely to lead to general compliance with the new speed limit</i>'. Paragraph 96 (in part) goes on to say '<i>Schemes need to aim for compliance with the new speed limit</i>'. The wording used in the draft policy is therefore considered to be fully in line with the Circular.</p> <p>The respondent refers to Government Policy. The following statement is from the DfT and clarifies the status of the Circular . <i>The DfT circular 01/2013 is guidance to local authorities on setting local speed limits. The guidance is designed to assist local authorities with their decision making process, but is not mandatory. Departmental guidance is invariably based on best practice and it is hoped that local authorities take note of the advice provided. However, guidance is by its very nature, optional. The Department would much rather local authorities have the flexibility to introduce speed limits that are appropriate for the local environment. This reflects the wider Government belief in localism and, wherever practicable, in the right of local authorities to make decisions that best reflect the needs of their communities.</i></p> <p>The average speed reduction of 6.3mph recorded in Portsmouth was on a minority of roads that had before speeds in excess of 25mph. The resultant after speeds still remained in excess of 24mph and therefore could be considered a non compliant limit. The overall average speed reduction achieved in Portsmouth is recorded as 1.3mph.</p>
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		<p>limits as:</p> <ul style="list-style-type: none"> <li>• Collision and casualty savings</li> <li>• Conditions and facilities for vulnerable road users</li> <li>• Impacts on walking and cycling and other mode shift</li> <li>• Congestion and journey time reliability</li> <li>• Environmental, community and quality of life impact, such as emissions, severance of local communities, visual impact, noise and vibration; and</li> <li>• costs</li> </ul> <p>WCC's criteria (in 5.2) are solely: mean existing speeds; strategic function; and village location. <b><u>This fails to address guidance in Circular 01/13 and makes the draft policy unsound.</u></b> It completely ignores key aspects of government policy, e.g. Section 6, Para 84 of 01/13 which emphasises that <i>'traffic authorities are able to use their power to introduce 20mph speed limits or zones on: Major streets where there are – or could be - significant numbers of journeys on foot, and/or where pedal cycle movements are an important consideration, and this outweighs the disadvantage of longer journey times for motorised traffic. This is in addition to Residential streets in cities, towns and villages, particularly where the streets are being used by people on foot and on bicycles, there is community support and the characteristics of the street are suitable'</i>. WCC's criteria should include: significant use by pedestrians and cyclists (and impact on modal shift); conditions and facilities for vulnerable road users; community quality of life impact and community severance (e.g. children's routes walking to school).</p>	<p>The draft policy sets out at paragraph 5.1 that a Wiltshire Policy should not deviate from the guidance given in Circular 01/13 and is cross referenced to it. As such the policy does not seek to repeat all the information set out in the guidance. Rather the two documents should be read together. It is accepted that Paragraph 5.2 does not specifically list those areas set out at Paragraph 84 although it was always the intention that these areas could be considered. As such it will be recommended that the Policy wording will be amended to reflect this.</p>
C43	Resident of Bradford on Avon	<p>20mph as a default town-wide speed limit is a popular proposal in Bradford-on-Avon, and one that was backed unanimously by the Town Council last night.</p> <p>We can prove statistically that it is a cost-effective and safer solution, with many life-enhancing benefits such as noise and pollution reduction, not to mention an increase in house prices.</p> <p>To this end, we need a policy that allows the 20mph town-wide to happen. There are a couple of specific clause that need to be changed for the policy to effectively serve the community and it's wishes.</p> <ol style="list-style-type: none"> <li>1. That only areas where the mean speed is less than 24mph will be considered. This seems to be driven by a concern for non-compliance, rather than a consideration for the most appropriate speed. There are many ways of encouraging compliance which are not mentioned in the policy. Complete compliance, in any case, is not always necessary for vast improvement to take place. For example, other areas with 20mph have seen an average reduction in speed of 7mph, which is significant enough to improve quality of life and safety.</li> <li>2. That only two areas will be considered per area per board. If a change in speed limit is appropriate then it must be considered, even if that means considering more imaginative funding streams to enable it to happen.</li> </ol>	<p>A town wide 20mph limit covering all roads is impractical and would not be in compliance with DfT guidance. Paragraph 84 of Circular 01/13 sets out those areas that are considered suitable for 20mph restrictions. Paragraph 90 and Table 1 of Circular 01/13 state that 20 mph limits and zones should only be used where motor vehicle movement is not the primary function. Radial routes into the town centre (Bradford Road, Frome Road, Winsley Road etc) and internal distributor roads (Moulton Drive, Springfield etc) would not be suitable. However other areas of the town, predominantly the residential areas are highly likely to be suitable and could be subject to area wide 20mph limits.</p> <p>An average speed reduction of 6.3mph recorded in Portsmouth was on a minority of roads that had before speeds in excess of 25mph. The resultant after speeds still remained in excess of 24mph and therefore could be considered a non compliant limit. The overall average speed reduction achieved in Portsmouth is recorded as 1.3mph.</p> <p>See response to substantive comments</p>

		<p>Can I also point out that the draft policy does not reflect the spirit of the DfT guidelines on which it is supposed to be based. There is no mention of the multiple positive benefits outlined by the DfT such as to the elderly, disabled and children, nor that it would increase cycling and the number of children walking to school. It is dismissive of the obvious popularity of 20mph, saying this would fade with time as people realised it didn't work. Not so. If you would like any research, briefings or statistics on the success of 20mph in other areas, then please let me know. I would be more than happy to provide you with the evidence.</p> <p>I don't expect you have time to reply to these comments, as I know you have received so many on this subject, but I would love some reassurance that, for some balance, our views are being heard by someone other than those who actually wrote the draft policy.</p>	<p>The quality of life and community benefits are clearly set out within the Circular 01/13. The draft policy sets out at paragraph 5.1 that a Wiltshire Policy should not deviate from the guidance given in Circular 01/13 and is cross referenced to it. As such the policy does not seek to repeat all the information set out in the guidance. Rather the two documents should be read together.</p>
C44	Resident of Monkton Combe	<p>An initial reading of the Report gives clear inference that the writer approaches the task from a partisan perspective and clear predetermination. There are multiple examples of loose and unsupported opinion being offered as fact, albeit inaccurate and unsubstantiated.</p> <p>2.4 'Almost all the research into 20mph indicates....'  2.5 'The likelihood of significant speed alterations remains poor....'  2.6 'Appears to be broadly typical across all sites....'</p> <p>There are examples of highly selective, unrepresentative and outdated data-examples offered to support a misleading generalization, quite contrary to the nationally-accumulated evidence.</p> <p>2.6 'Early evidence....data from Oxford, Bristol and Warrington....'  2.7 'It is too early to evaluate the effect...'  2.7 ' There still appears to be little conclusive .....evidence....'</p> <p>There are several examples of misquoting and misrepresenting formal DfT and ACPO guidance documents, which together point the unwary to inappropriate conclusions.</p> <p>2.1 There is NO legal obligation for 'Zones and Limits' to be self-enforcing. Consequently many such schemes could have been constructed much more economically that the wrong presumptions required.</p> <p>2.4 Repeater signs, where required, are NOT required to be expensive 'Signs On Poles'. Very much cheaper painted roundels/indicators could, as with other authorities, be used – achieving worthwhile economies.</p>	<p>The wording of the draft policy is not considered to be negatively worded but seeks to introduce 20mph restrictions into those areas where the benefits that arise are real, measurable and true and not just done for populist or political gain and is based both on Wiltshire's own trial sites findings and those achieved nationally.</p> <p>The Circular advises that all 20mph limits need to aim for compliance with the new limit and that there should be no expectation on the police to provide additional enforcement to ensure compliance. The Circular further advises that as average speed reductions through sign only limits are on average 1mph, introducing 20mph limits on those roads with speeds above 24mph is likely to be insufficient to make the resulting speeds generally compliant with the new 20mph limit.</p> <p>The reference to repeater signs covers both upright signs and carriageway roundels. A carriageway roundel is classified as a sign in the Traffic Signs Regulations and General Directions.</p>

		<p>2.4 Guidance in 'DfT 2013' is materially misrepresented. Para 97 of that Circular actively encourages the use of 'light touch' traffic calming measures together with Terminal and repeater Signs to achieve the desired affect – and much more economically than the earlier alternative. This reflects that significant 'cost/benefit' outcomes experienced in more recent trials and implementations.</p> <p>2.6 'Early evidence' from 3 early trials is superceded by later evidence from many more subsequent trials encompassing the economic 'hybrid' schemes indicated above. Consequently, all the several authorities which reported disappointing early trials have chosen to expand their schemes on later, fuller evidence. More than two dozen authorities now implement such schemes, with many more in planning.</p> <p>2.7 It is agreed 'it is too early to evaluate the effect on collision rates' relative to Wiltshire's very small number of trial schemes. It is not too early to consider the encouraging data being supplied to the DfT by the growing number of other participatory authorities – including our progressive neighbours in Bristol and Bath &amp; North East Somerset.</p> <p>FAQ/9 This baldly misrepresents the true position. It is for Wiltshire Constabulary to form its own policy regarding enforcement. An Area Commander at a CAB Meeting more than 3 years ago stated unambiguously and on the record that, provided a 20mph limit is legally constituted, if a continuing problem of speeding exists and if the community so requests, then – subject to police resources and other priorities – that limit will be enforced like any other legally-constituted restriction.</p> <p>It is the view of this respondent that the relevant Report materially misinforms and misguides both Elected Members and the public on the issues now relating to 20mph speed limits. It is consequently unfit for the purpose of properly informing Councillors' and public debate on what should become effective policy in this matter.</p> <p>Given the huge public interest in this matter right across Wiltshire, the possibilities for fiscal savings, and the opportunity to 'get it right', Councillors are encouraged to seek more competent and better informed guidance – such as that offered by Dr. Rod King MBE - prior to formulation and adoption of policy.</p>	<p>Where overall average speeds are higher, reliance on light touch engineering measures, publicity and education in order to achieve compliance is likely to be unrealistic, especially in the long term. As a result the wider community benefits so often associated with 20mph restrictions are also unlikely to occur thereby resulting in long term community dissatisfaction. In these circumstances a zonal approach is considered the better option.</p> <p>Comment noted. Hybrid scheme are possible under the draft policy.</p> <p>The schemes in Bristol and BANES are in their early stages and they have stated that it is too early to accurately draw conclusions about long term effects on casualty reduction.</p> <p>Enforcement – See response to substantive comments</p> <p>It is considered that the draft policy substantially complies with the DfT guidance</p> <p>This report and the comments received will form the basis of an approval policy. The comments made by Rod King are considered elsewhere in this report.</p>
C45	Landford Parish Council	<p>The Para Nos. referred to below relate to the paragraphs in Appendix 1 of the consultation document.</p> <p>1. Para 2.1 below states that they should be self-enforcing. This means the</p>	<p>Comment noted</p>

		<p>construction of either humps or pinch-points plus the erection of all the necessary warning signs, etc. This will only increase the urbanisation of this rural area.</p> <ol style="list-style-type: none"> <li>2. Traffic calming measures contribute to the delays to emergency services getting to an incident in the minimum time.</li> <li>3. People with dwellings immediately adjacent to the speed “calming” measures will suffer increased amount of traffic noise and/or ground vibrations.</li> <li>4. A 20mph speed limit without calming measures would be even less effective than the current 30mph limit due to inadequate enforcement.</li> <li>5. Para 2.4 states that without calming measures they only have any effect if the mean speed is already below 24mph and then only 1-2 mph. This clearly means that without calming measures the 20mph speed limit achieves nothing of significance. This is reinforced in Para 2.6 which states that the reduction is only in the region of 1mph but as no figure is given for the standard deviation of the mean it seems likely that the reduction lies within the uncertainty.</li> <li>6. Para 2.7 suggests that casualty rates are not reduced by much if any by this limitation. Again no measure of variance is stated.</li> <li>7. In this village the most likely location for the 20mph speed restriction would be outside the School, which is at a road junction. Such measures would be permanent throughout the day and night yet they could only be justified during school arrival and leaving times when the chaos outside the school already slows the traffic.</li> <li>8. It would appear that no roads in Landford would satisfy the conditions stated in para 5.2.</li> </ol> <p>In conclusion the view of the Council is that for this village any introduction of 20mph limits would be a waste of public money as well as significantly detracting from its rural ambience.</p>	<p>The emergency Services are consulted and their opinion is sought as part of the consultation work undertaken for a 20mph restriction.</p> <p>Comment noted. The type of traffic calming feature used will be the one that is considered to be the most suitable and effective taking into account local conditions. However before any measures are introduced local consultation would be undertaken and this would give residents and others the opportunity to comment on the form of any feature proposed.</p> <p>See response to substantive comments</p> <p>Comment noted</p> <p>Comment noted</p> <p>The use of 20mph speed limits outside schools is subject to a separate review.</p> <p>Comment noted</p>
<b>C46</b>	Rod King 20's Plenty for us.	Having reviewed this proposed policy against the current DfT guidance (Circular 01/2013), recent changes to signage requirements and the moves made by other traffic authorities towards wide-area 20mph limits we believe that the proposed Wilts C C policy misinforms both councillors and the public on key aspects of these recent changes and as such could lead to an unbalanced and misinformed decision being made on the setting of local speed limits within Wiltshire.	

		<p>We therefore trust that it will be retracted and redrafted to address the points raised. 20's Plenty for Us would be pleased to make comment on any such revised policy.</p> <p>Of particular concern is that the proposed policy looks quite narrowly at the use of speed limits and allows imprecise detail on the setting of speed limits to undermine the responsibility to set appropriate limits. Changed Speed limits should always be accompanied by engagement with the public to inform the need and benefits of lower speeds. It is much more about mass behaviour change and endorsement of society values than simply an interaction between drivers and signs. And it is in this area that many traffic authorities are seeing wide-area implementation of 20mph limits as a real lever to take the increasing aspiration for safer and calmer streets into behaviour change by residents that results in lower speeds. These include Bristol, Bath &amp; NE Somerset, Portsmouth, Liverpool, Manchester, Lancashire, Warrington, Wigan, Oldham, Sefton, Bolton, Bury, Rochdale, York, Nottingham, Middlesbrough, Newcastle, Edinburgh, Oxford, Cambridge, Brighton &amp; Hove, Southampton, Chichester, as well as many London Boroughs. All of these are introducing 20mph limits for all residential streets with minimal exceptions. In addition the distinction between 20mph zones and limits is now much less than in the past. Maybe some "history" would be useful.</p> <p>During the early part of the century there was a clear distinction with zones always having physical calming at frequent intervals and used for several roads, whereas limits were used for short stretches on single roads and had repeater signs at frequent intervals. Zones were not allowed repeater signs and limits did not have physical calming.</p> <p>This all started to become blurred in 2006 when the revised guidance was "stretched" to enable the implementation of 20mph limits rather than zones across many residential roads within built-up areas. This was the basis on which all of the above traffic authorities implemented their authority-wide 20mph limits.</p> <p>Whilst being outside of the recommendations within the guidance the results were supported by successive Labour and Lib-Dem/Conservative governments. It was recognised that there was too strong a demarcation between zones and limits which caused problems when traffic authorities wanted to include legacy 20mph zones within a wider area of limits. Hence in 2012 the regulations on signage were changed. Note that whilst the setting of 20mph limits is "guided" by the DfT the signage is "regulated". An important distinction in order to provide common standards of signage across the country. This defined repeater signs and carriageway roundels as "traffic calming" devices and also included some "natural" features such as mini-roundabouts. It also specified that within a zone there should be a minimum of 1 physical calming device. This suddenly completely transformed the options for traffic engineers. Now isolated zones could be incorporated into one large zone, simply by filling in the old 30mph parts with repeater signs of carriageway roundels. New 20mph zones could be set up with mainly repeater</p>	
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		<p>signs and include physical calming in particular places. All being done within a contiguous area. In fact for creative Traffic Engineers the distinction between zones and limits hardly exists at all. 20mph can be implemented with repeater signs in areas where speeds are already low with the option of a combination of signage, physical calming (speed bumps and chicanes), less physical calming (staggered parking bays, rumble strips, lines, roadside planters), together with speed indicator devices (either fixed or portable) and soft measures such as engagement, consultations, publicity, surveys, etc.</p> <p>This is further enabled through the 2013 guidance which asks traffic authorities to widen the implementation of 20mph limits. And this is how Traffic Engineers throughout the country are using the new regulations and guidance to change the whole way in which community roads are shared.</p> <p>However, whilst this may be a “subjective” view on the proposed policy, the following looks at the detail within the policy.</p>	
	1.1	<p>We believe that reference should also be made to the signage changes made in 2012.</p> <p>This allows traffic authorities to far more flexibly and economically implement 20mph zones and limits. See comment below.</p>	<p>The changes made to national regulations with regard to signing of 20mph restrictions are well understood by the council. The paragraphs state that each restriction will vary in detail and as such will be tailored to the location and specific circumstances.</p>
	2.1	<p>Actually the guidance refers to “successful 20mph zones and limits being generally self-enforcing” (para 85). There is no legal obligation for them to be self-enforcing.</p> <p>The signage changes made in 2011 now only require a minimum of one physical calming device in a 20mph zone. Repeater signs, carriageway roundels and other features may be used where appropriate. This is of considerable importance and allows many 20mph zones to be expanded with just repeater sign and physical calming applied selectively.</p>	<p>The Circular advises at Paragraph 96 that all 20mph limits need to aim for compliance with the new limit and that there should be no expectation on the police to provide additional enforcement to ensure compliance. The Circular further advises that as average speed reductions through sign only limits are on average 1mph, introducing 20mph limits on those roads with speeds above 24mph is likely to be insufficient to make the resulting speeds generally compliant with the new 20mph limit. It is accepted that where before mean speeds are just above 24mph that the introduction of light touch engineering measures could well result in general compliance.</p>
	2.4	<p>Now 20mph limits may include carriageway roundels as an alternative to upright signs. (Para 99).</p> <p>Whilst it is technically correct to state that 20mph limits lead to relatively small reductions in ‘mean’ speed, research has shown that speed reductions are skewed towards the fastest roads. This is because many roads are included, for consistency, where average speeds are already low and hence result in little change. On faster roads (above 24mph) there have been average reductions of 6mph recorded.</p> <p>DfT 2013 does NOT suggest that 20mph limits should “only” be considered for use</p>	<p>The interim evaluation report on the Portsmouth 20mph speed limit concluded that within an area wide application of 20mph sign only limits, those roads with average speeds higher than 24mph did benefit from significant speed reductions but not to the extent that the 20mph speed limit was self enforcing.</p>

	<p>on roads where mean speeds are already 24mph or less. It actually says that :-</p> <p>“97. The implementation of 20 mph limits over a larger number of roads, which the previous Speed Limit Circular (01/2006) advised against, should be considered where mean speeds at or below 24 mph are already achieved over a number of roads. Traffic authorities are already free to use additional measures in 20 mph limits to achieve compliance, such as some traffic calming measures and vehicle activated signs, or safety cameras. Average speed cameras may provide a useful tool for enforcing compliance with urban speed limits.”</p> <p>Whilst this may only be considered a subtle difference, it is important that the DfT guidance is accurately reflected. Rather than guiding against a 20mph limit in such circumstances it actually suggests the need to use methods to gain compliance.</p> <p>The reference in 2.4 to the layout and character of the road is not within DfT 2013 in association with the 24mph.</p>	<p>This paragraph refers to Area wide 20mph limits. Where overall average speeds are higher, reliance on light touch engineering measures, publicity and education in order to achieve compliance is likely to be unrealistic, especially in the long term. As a result the wider community benefits so often associated with 20mph restrictions are also unlikely to occur thereby resulting in long term community dissatisfaction.</p> <p>The DfT guidance is just that, guidance. It is for each local highway Authority to decide whether to adopt the guidance unchanged or with amendment to suit its own circumstances.</p> <p>There is evidence that 20mph limits, where appropriately applied, can bring about a number of positive effects on road safety, quality of life, and encourage healthier modes of transport such as walking and cycling. In order to be successful, speed limits require the respect of drivers and this can only be achieved where the reasons for the limit are unambiguous and where broad compliance is achieved without excessive reliance on police enforcement or widespread engineering measures. The Wiltshire policy seeks to build upon the evidence provided by its use of 20mph zones, the rural 20mph limit trial and DfT guidance in Circular 01/13 to provide a robust policy which encourages their use in areas where the benefits are tangible, measurable and supported by the police. To do otherwise will result in poorly considered 20mph limits in which overall driver compliance is low and where public acceptance of all 20mph limits is gradually eroded.</p>
2.5	<p>Once again reference is made to significant speed reductions remaining poor fails to take notice of the natural distribution of speed reductions which take place when wide area limits are set.</p>	<p>The interim evaluation report on the Portsmouth 20mph speed limit concluded that within an area wide application of 20mph sign only limits, those roads with average speeds higher than 24mph did benefit from significant speed reductions but not to the extent that the 20mph speed limit was self enforcing.</p>
2.6	<p>We accept that in over a given length of road then a limit will be less effective than a zone. However this does not take into account the fact that 20mph zones are approximately 50 times more expensive than 20mph limits. Hence for the same money you can treat 250 people living on a street with a physically calmed zone, or 12.500 people living in a community with a wide-area 20mph limit. The high cost of 20mph zones has meant that they can only be targeted on places where there are specific problems. 20mph limits work not through isolated traffic management, but by large scale behaviour change. Isolated and small 20mph zones actually legitimise travelling faster in the rest of the road network.</p>	<p>It is well known and obvious that 20mph zones are more expensive to install than 20mph speed limits.</p> <p>The interim evaluation report on the Portsmouth 20mph speed limit concluded that within an area wide application of 20mph sign only limits, those roads with average speeds higher than 24mph did benefit from significant speed reductions but not to the extent that the 20mph speed limit was self enforcing.</p> <p>The quality of life and community benefits are clearly set out within</p>

		<p>Whilst noting that the total average speed reduction from Oxford, Bristol and Warrington was around 1.5mph it is notable that all of these authorities after looking at the results in detail decided to expand their schemes. Simply looking at the headline average reductions does not show the wide benefits gained. These come from lower noise, lower pollution, better accessibility for those without cars, greater child and elderly mobility, healthier active travel and a better built environment.</p>	<p>the Circular 01/13 and are understood by the Council. Where overall average speeds are higher, reliance on light touch engineering measures, publicity and education in order to achieve compliance is likely to be unrealistic, especially in the long term. As a result the wider community benefits so often associated with 20mph restrictions are also unlikely to occur thereby resulting in long term community dissatisfaction.</p> <p>The draft policy seeks to introduce 20mph restrictions into those areas where the benefits that arise are real and true and not just done for populist or political gain.</p>
	2.7	<p>The reason why the results have not been statistically proven is largely due to the numbers being relatively small so reducing any confidence level. As stated above those who have looked at the statistics in detail have been pleasantly surprised with the result and subsequently recommended to members wider implementation.</p>	<p>It is agreed that the relatively small numbers mean that any statistical analysis cannot be fully relied on. To state that those that have looked in detail have been pleasantly surprised is a misnomer. The Portsmouth study indicated that whilst casualty reductions did occur on a number of roads there was evidence of migration to other areas of the city where the resultant numbers of casualties then increased.</p>
	3.0	<p>This part of the proposed policy neglects to include some fundamentally important aspects of the 2013 guidance.</p> <p>For example. There is no mention of the requirement to include other factors beyond casualty reduction. These include encouraging active travel for public health, quality of life in communities, lowering noise and pollution. These are all beneficial outcomes of lower speeds yet do not appear in the policy.</p> <p>The guidance also states that :-</p> <p>“18. Speed limits are only one element of speed management. Local speed limits should not be set in isolation. They should be part of a package with other speed management measures including engineering and road geometry that respect the needs of all road users and raise the driver's awareness of their environment; education; driver information; training and publicity. Within their overall network management responsibilities, these measures should enable traffic authorities to deliver speed limits and, as importantly, actual vehicle speeds that are safe and appropriate for the road and its surroundings. The measures should also help drivers to be more readily aware of the road environment and to drive at an appropriate speed at all times.”</p> <p>This implies a responsibility by the Traffic Authority to very much include soft measures such as engagement, education and publicity to bring about behaviour change rather than simply relying on “signs on sticks”.</p> <p>An important requirement in setting speed limits is the need to take into account</p>	<p>The quality of life and community benefits are clearly set out within the Circular 01/13. The draft policy sets out at paragraph 5.1 that a Wiltshire Policy should not deviate from the guidance given in Circular 01/13 and is cross referenced to it. As such the policy does not seek to repeat all the information set out in the guidance. Rather the two documents should be read together.</p> <p>The Council is fully aware of the contents of paragraph 18 and as demonstrated at the trial 20mph sites has fully engaged with the local communities before, during and after implementation.</p>



		<p>the needs of vulnerable road users. The guidance notes :-</p> <p>32.Different road users perceive risks and appropriate speeds differently, and drivers and riders of motor vehicles often do not have the same perception of the hazards of speed as do people on foot, on bicycles or on horseback. Fear of traffic can affect peoples' quality of life and the needs of vulnerable road users must be fully taken into account in order to further encourage these modes of travel and improve their safety. Speed management strategies should seek to protect local community life.”</p> <p>Whilst everyone respects the need for drivers to make judgements on speeds, they are not the only road users and such judgements are often flawed by ignorance of local conditions, presence of other users, etc. Hence the need for Traffic Authorities to fully take into account the needs of vulnerable road users to protect them against the actions of responsible and negligent motorised road users.</p> <p>Note that the need to protect “vulnerable road users” is very much aligned to the Equality Act 2010 and its requirement that polices should not discriminate against disadvantaged groups. For road users this will include the elderly and disabled who are particularly at risk when using the roads. Hence a full consideration of the requirements of the Act do need to be considered when approving any policy. We note that there are no references to the act in the proposed policy. We treat this as a serious omission.</p> <p>Within the last guidance (01/2006) there were just 12 paragraphs on 20mph limits and zones. In the latest 01/2013 guidance there are 24. This reflects the popularity and progress in implementing 20mph limits to the extent that now 12.5m people live in local authorities implementing 20mph limits for most residential and urban streets.</p> <p>It therefore seems strange that this doubling of guidance together with signage and other changes should be condensed down to simply including just 4 of those paragraphs(ie 85, 86, 95 and 84). This fails to appropriately reflect the support for 20mph limits in the new guidance.</p> <p>The following paragraphs seem to imply that 20mph limits and zones can only be considered where all of the conditions apply. This needs clarification. If so it is very restrictive.</p>	<p>This paragraph relates to the setting of all speed limit levels not just to 20mph restrictions. The council has undertaken a comprehensive review of all its speed limits on A and B class roads since 2006 in accordance with the original Circular 01/2006. The needs of vulnerable road users has been fully taken into account as part of this review.</p> <p>The draft policy sets out at paragraph 5.1 that a Wiltshire Policy should not deviate from the guidance given in Circular 01/13 and is cross referenced to it. As such the policy does not seek to repeat all the information set out in the guidance. Rather the two documents should be read together.</p>
5.2		<p>The proposed policy deviates substantially from DfT 01/2013. The guidance does not prohibit consideration of 20mph limits for roads with current averages above 24mph, or them being primary routes or having a “strategic” function.</p> <p>Traffic authorities are required to consider the appropriate speed limit for all roads. It is not the setting of the limit which should be compromised due to the current and</p>	<p>The DfT guidance is just that, guidance. It is for each local highway Authority to decide whether to adopt the guidance unchanged or with amendment to suit its own circumstances.</p> <p>There is evidence that 20mph limits, where appropriately applied, can bring about a number of positive effects on road safety, quality</p>

		<p>inappropriate speed of vehicles or the hierarchy of the route. It is the implementation which should be elaborated to achieve the appropriate speed. The concern of non-compliance should not be used as a reason to do nothing, but should trigger a resolve to do what is appropriate. In this respect 01/2013 makes it very clear that other measures including engagement, publicity, education, traffic calming, carriageway roundels, and even average speed cameras may all be used to gain compliance where this is an issue.</p> <p>By excluding the use of the lower costs and more cost effective solution of wide-area 20mph limits this policy will constrain the setting of appropriate speed limits and legitimise 30mph speeds in many places where it is totally inappropriate. This will certainly affect the ability to meet modal shift targets and contribute to a reduction in the quality of life and available transport options within communities.</p>	<p>of life, and encourage healthier modes of transport such as walking and cycling. In order to be successful, speed limits require the respect of drivers and this can only be achieved where the reasons for the limit are unambiguous and where broad compliance is achieved without excessive reliance on police enforcement or widespread engineering measures. The Wiltshire policy seeks to build upon the evidence provided by its use of 20mph zones, the rural 20mph limit trial and DfT guidance in Circular 01/13 to provide a robust policy which encourages their use in areas where the benefits are tangible, measurable and supported by the police. To do otherwise will result in poorly considered 20mph limits in which overall driver compliance is low and where public acceptance of all 20mph limits is gradually eroded.</p> <p>Area wide limits are included within the policy.</p>
	5.3	<p>This set of requirements is even more restrictive and impose conditions which are arbitrary. In particular they put the convenience of drivers well above the safety of pedestrians and cyclists in the condition regarding avoidable routes.</p>	<p>This paragraph is considered substantially compliant with the Circular. The conditions are not arbitrary but based on sound engineering judgement and extensive experience of 20mph zones in Wiltshire.</p>
	6.1	<p>As detailed above with 12.5m people now in Total 20 authorities the only “plateauing” will be when communities throughout the whole of Wiltshire are demanding 20mph limits. Other authorities have found NO grounds for prioritising requests. They are being phased in to include all communities. Note that in recent British Social Attitude Survey 73% of those surveyed say that 20mph is the right speed limit for residential roads with only 11% being against.</p>	<p>The need to prioritise requests reflects the administrative arrangements that exist in Wiltshire. The county is broken down into 18 community areas and is administered by Area Boards. Clear prioritisation is required to give each community area an equal chance of having 20mph restrictions delivered on the ground. In addition to this there are budgetary and resource constraints that need to be taken into account.</p>
	6.2	<p>The idea that the setting of appropriate speed limits can somehow be arbitrarily “rationed” to two locations per Board area per annum is not consistent with the statutory responsibility to set appropriate speed limits. It reflects an attitude that seeks to “manage expectations” rather than deliver community improvements.</p>	<p>The need to prioritise requests reflects the administrative arrangements that exist in Wiltshire. The county is broken down into 18 community areas and is administered by Area Boards. Clear prioritisation is required to give each community area an equal chance of having 20mph restrictions delivered on the ground. In addition to this there are budgetary and resource constraints that need to be taken into account.</p>
	7.1	<p>20mph limits deliver far more than just road safety. Other local authorities are finding a wide range of sources for the funding which complement LTP funding with public health, section 106 and development funds, Local Sustainable Transport Funds, etc. They operate very much on seeking funding to deliver the change which communities need rather than rationing that change based on</p>	<p>All of the allocated funding comes from the Council’s Integrated Transport block. The opportunity to use other funding sources, including Area Board grants, Section 106 deposits, and Health funds, can and will be taken as individual circumstances allow.</p>

		<p>limited funding.</p> <p>This often uses innovative and constructive collaboration between partners such as education, public health, social services to spread a consistent message about the value of speed reduction to maximise compliance.</p> <p>We believe that the Wilts CC policy is far too restrictive in its funding and the result is that it becomes a limiting and constraining factor rather than a supporting one.</p>	
	8.1	<p>Every local authority implementing wide-area pilots of 20mph limits with appropriate engagement, education, support and analysis has concluded that they offer excellent value for money and consequently decided to roll- out across the complete authority. To date we are not aware of any local authority or community reversing any 20mph limits and setting them back to 30mph.</p> <p>Whilst 20mph limits are not a panacea for all road safety issues, their adoption is a key foundation to enabling all citizens to make an equitable choice of transport modes and increase quality of life in communities.</p>	Comments noted
	Q1	<p>Portsmouth showed a 7mph reduction in average speeds on roads where previously the average was between 24 and 29mph. Whilst general compliance may not have been achieved there has been a substantial benefit in such speed reduction.</p>	<p>The 7mph reduction in speed was achieved over a minority of roads and in no way should be treated as the norm as to what can be expected elsewhere. The interim evaluation report on the Portsmouth 20mph speed limit concluded that whilst some benefit was forthcoming the 20mph speed limit was not self enforcing and speeds remained above 24mph.</p>
	Q2	<p>Compliance may be low but benefits are high. Compliance may be achieved by subtle and inexpensive measures such as carriageway roundels, staggered parking, etc.</p>	<p>If the compliance is low how can the benefits be high? The implementation of a 20mph limits at locations where mean speeds are not 24mph or less is unlikely to bring about the community benefits associated with correctly sited 20mph limits</p> <p>The draft policy seeks to introduce 20mph restrictions into those areas where the benefits that arise are real and true and not just done for populist or political gain.</p>
	Q3	<p>There is much evidence of the benefits of 20mph limits, including speed reduction.</p>	<p>The quality of life and community benefits are fully understood but these will only come about when true and long term driver behaviour and lower speeds come about.</p>
	Q4	<p>Other local authorities have concluded that there are casualty reductions from 20mph limits, especially where they have invested in additional engagement, publicity and light touch enforcement.</p>	<p>The Portsmouth study indicated that whilst casualty reductions did occur on a number of roads there was evidence of migration to other areas of the city where the resultant numbers of casualties then increased.</p>
	Q5	<p>Heavier touch measures are also possible and you can also have a large zone with</p>	<p>This is understood.</p>

		only one physical calming feature if appropriate.	
	Q6	Incorrect. Carriageway roundels can be used instead of repeater signs.	The reference to repeater signs covers both upright signs and carriageway roundels. A carriageway roundel is classified as a sign in the Traffic Signs Regulations and General Directions.
	Q7	This again confuses the issue regarding current speeds. It is a traffic authority responsibility to set the correct limits and implement appropriate measures to achieve compliance rather than adopt a higher limit on the assumption that it will not adopt additional measures.	It is considered that there is no confusion in the response given to this question.
	Q9	This is incorrect on two counts. ACPO only provide guidance and it is up to each police force to establish its own policy on 20mph enforcement. Routine enforcement is being undertaken by other forces. ACPO have also recently clarified its position on 20mph limits.	See response to substantive comments
	Q13	We use the cost of £1,100 per km for limits and £60,000 per km for physically calmed zones. Once the cost is taken into account then limits are 6.5 times more effective in speed reduction than physical calming.	These costs are generic and cannot be relied on for use in Wiltshire.
	Q16	It is engagement and consistency that bring about change in driver attitudes. Real benefits come from the roads with higher prevailing speeds where reductions are larger. If faster roads need more measures to achieve compliance then these should be considered rather than exclude them and maintain a limit that is 10mph higher than ideal.	In the circumstances where a 20mph speed limit is not considered viable it would be possible to consider a 20mph zone with the associated physical features controlling vehicle speeds. This is fully covered by the draft policy

<b><u>20mph speed limit restrictions policy</u></b> <b><u>Results of Consultation</u></b>			
	<b><u>RESPONDEE</u></b>	<b><u>COMMENTS</u></b>	
<b>S1</b>	Resident of Mere	Supports the policy and suggests that Mere village centre should have a 20mph limit.	
<b>S2</b>	Hilmarton & Goatacre Group Improving Safety	Suggests 20mph limits in various areas of Hilmarton & Goatacre	
<b>S3</b>	Resident of Shrewton	Would like to see traffic calming measures installed on the A360 through Shrewton	
<b>S4</b>	Parish Councillor from Shrewton	Requests a 20mph limit through Shrewton	
<b>S5</b>	Resident of Upavon	Requests a 20mph limit in Upavon High Street.	
<b>S6</b>	Resident of Wiltshire	Suggests that 20mph should be outside every school in Wiltshire	
<b>S7</b>	Resident of Malmesbury	Would like the 20mph zone extended to cover the triangle in Malmesbury	
<b>S8</b>	Wingfield Parish Council	Requests a 20mph limit in Church Lane, Wingfield	
<b>S9</b>	Monkton Farleigh Parish Council	Requests a 20mph limit in the village	
<b>S10</b>	Resident of Ryland Way, Trowbridge	Requests a 20mph speed limit or traffic calming on Hargreaves Road	
<b>S11</b>	Resident of Trowbridge	Requests a 20mph limit on Drynham Road, Trowbridge	

<b>S12</b>	Resident of Warminster	Requests a 20mph limit on Upper Marsh Road, Warminster	
<b>S13</b>	Bishopstrow Village meeting	Requests a 20mph limit in Bishopstrow	
<b>S14</b>	Resident of Bradford on Avon	Requests a 20mph limit on Masons Lane in Bradford on Avon	
<b>S15</b>	Resident of Frogwell Chippenham	Requests a 20mph limit on Frogwell in Chippenham	
<b>S16</b>	Resident of Aldbourne	Requests a 20mph restriction in Aldbourne	
<b>S17</b>	Resident of Sherston	Requests a 20mph limit with supporting flashing signs on Brookhill, Sherston	
<b>S18</b>	Resident of Court Street Sherston	Requests traffic calming humps in Court Street, Sherston	
<b>S19</b>	Resident of Westwood	Requests a 20mph limit in Westwood	
<b>S20</b>	Winterslow Parish council	Speeding is not the problem its bad driving. Do not want any 20mph limits.	
<b>S21</b>	Shrewton Parish council	Request 20mph restrictions and horizontal deflections on a number of roads in Shrewton	
<b>S22</b>	Resident of Aldbourne	Request 20mph limits and speed humps in Albourne	
<b>S23</b>	Dauntsey Parish Council	Request 20mph limit in Dauntsey Village	
<b>S24</b>	Resident of Burnivale, Malmesbury	Requests a 20mph limit on Burnivale, Malmesbury	
<b>S25</b>	Fyfield & West Overton Parish Council	Requests a 20mph limit through Lower Fyfield	
<b>S26</b>	Resident of Wiltshire	Suggests that all rural single track roads should be subject to a 20mph limit.	
<b>S27</b>	Governer of Oaksey Primary School	Requests a 20mph limit outside the school	
<b>S28</b>	Resident of Kingsbury Street, Marlborough	Requests a 20mph limit on Kingsbury Street	
<b>S29</b>	Wiltshire Councillor	Requests a 20mph limit on College road Home Zone in Trowbridge	

<b>S30</b>	Cherhill Parish Council	Requests 20mph limits in Cherhill and Yatesbury	
<b>S31</b>	Enford Parish Council	Requests 20mph limits in East Chisenbury, Long Street, and Coombe	
<b>S32</b>	Resident of Corsham	Requests 20mph limits on the B3353, Stokes Road, Lacock Road, South Place, Pickwick Road and Newlands Road in Corsham.  Considers 20mph limits would encourage greater walking and cycling to school and that parents should be consulted.	