

Wiltshire Council
Environment Select Committee
9 December 2014

Supplement to the 20 mph Policy Task Group's Final Report

Collation of responses received to the Final Report

Responses Received in relation to the final version of the report

Rosie Meachin – Bradford on Avon 20s Plenty Group

Thank-you for letting us see the final report.

I would like to say that although you theoretically place great weight on the importance of evidence, the only evidence quoted is from those schemes with less successful outcomes.

There are many other schemes, such as Warrington and Islington which could have led you to a different conclusion. Cherry-picking evidence can be used to support any argument at all, and in this case indicates a bias against 20. By maintaining an outdated default speed limit that was established in 1934, when there were far fewer cars on the road, Wiltshire is prioritising finances over safety and well-being.

Margaret Willmot -Salisbury City Councillor

I would echo Rosie's concerns. Specifically I would draw your attention again to the post-20 mph study in Salisbury City Centre, which can be found here:

([https://cms.wiltshire.gov.uk/Data/Salisbury%20Transportation%20Plan%20Joint%20Committee%20\(WCC\)/20070215/Agenda/Item%20No.%2014%20-%20Salisbury%20City%20Centre%2020%20MPH%20Zone%20Afterstudy.doc.pdf](https://cms.wiltshire.gov.uk/Data/Salisbury%20Transportation%20Plan%20Joint%20Committee%20(WCC)/20070215/Agenda/Item%20No.%2014%20-%20Salisbury%20City%20Centre%2020%20MPH%20Zone%20Afterstudy.doc.pdf)).

This was referred to in Salisbury City Council's evidence, and also in evidence from Gill Anlezark for the Cycling Opportunities Group for Salisbury to the Env Select Committee in December 2013. Yet there is no mention of the findings from this study in the final report, which is one of the points I will be bringing to the Committee's attention on 9/12.

Rod King, MBE – 20s Plenty National Campaign

I have immediately noticed this statement :-

“It should be noted that Police cannot currently enforce 20 limits/zones by way of fixed penalty notices, any offences have to be dealt with by way of summons to court.”

This is wrong and untrue. How can members have any confidence in the report if it is not factual. This was changed in Sep 2013 when ACPO released new guidance allowing Speed Awareness courses, FPNs and summons on 20mph limits.

The report also said :-

34.The Task Group considered the use of ‘Shared Space’ schemes as an alternative method of managing speed and road safety. Although this type of scheme was of great interest to the Task Group and was deemed to facilitate the reduction of speed and improved road safety more efficiently than 20 mph schemes, the provision of alternatives lies outside of the Task Group’s remit.

I would point out that there is no evidence for such “efficiency” on a value for money basis. Hence it is not a viable or effective alternative for most locations where lower speeds are required. It also creates an “only here” mentality when isolated due to funding restriction, and hence endorses higher speeds on the rest of the residential road network.

I know that additional comments on the report will be included by local campaigners, but I would cite the above as evidence that the report is not accurate, that it will mislead and hence will not result in a balanced and reasonable decision by members of the committee.

9.6 The guidance is that enforcement by prosecution should not be considered when it is lower than the speeds reached in the following table:

Limit	Device tolerance	Fixed Penalty when education is not appropriate	Speed Awareness if appropriate		Summons in all other cases and above
			From	To	
20 mph	22mph	24 mph	24 mph	31 mph	35 mph
30 mph	32 mph	35 mph	35 mph	42 mph	50 mph
40 mph	42 mph	46 mph	46 mph	53 mph	66 mph
50 mph	52 mph	57 mph	57 mph	64 mph	76 mph
60 mph	62 mph	68 mph	68 mph	75 mph	86 mph
70 mph	73 mph	79 mph	79 mph	86 mph	96 mph

All speeds identified above are those shown on the speed device, speedometer or other detection devices

Taken from :

<http://www.acpo.police.uk/documents/uniformed/2013/201305-uoba-joining-forces-safer-roads.pdf>

Wiltshire Police – Chief Inspector Steve Cox, Road Policing Operations, Tri Force Specialist Operations Collaboration and Chair of the Wiltshire & Swindon Road Safety Delivery Group

Paragraph 21:

To be technically correct it should read “Police cannot currently enforce 20 limits/zones by way of fixed penalty notices, any offences have to be dealt with by way of summons to court”.

You may be aware that there are trial schemes in Devon and Cornwall where they are able to use an FPN but I am not aware of any time scales for these.

The current position in Wiltshire is that we only offer education for Careless Driving offences, we do operate speed awareness workshops, therefore we are not able to refer these offences to that process. Regarding fixed penalty notices, a number of forces are currently trialing 20mph FPN’s, however we are not one of those.

I have spoken to our Justice Traffic Office regarding this, they have confirmed we currently are not able to offer FPN’s for this offence.

Therefore, our position is that we can enforce as per the paper I submitted in May 13, however, our only option is to summons to Court.

Matthew Dean, Bradford on Avon

Obviously it is very useful to have the police view as if they won't rather than can't enforce 20mph zones that is obviously relevant to the Council's deliberations but the guidance from both the DfT and ACPO is clear and unambiguous. The guidance and the legislation has been tested in the courts. Therefore the report as it stands is factually incorrect whatever the views of Inspector Cox. Assuming Inspector Cox views have been quoted correctly, I understand that they are not also the views of the Wiltshire Police and Crime Commissioner.

Cllr Magnus MacDonald (Member of the Task Group)

When we started this process I was cynical about the value of 20mph, as the process has proceeded I've become convinced that along with many other measures this has to be the way forward and I may have some of the enthusiasm of a new convert.

The evidence of the effect of traffic on our communities, health and welfare is pretty devastating and we need to redress the balance of 50 years of one sided policies.

My biggest problem has been that whilst the evidence supporting the widespread introduction of 20mph seems, on the whole, well researched, the reasons against appear to be much less substantial and even a little hysterical.

For there to be a cultural change that genuinely puts people on a par with the car, or God forbid, ahead of it, the investment in infrastructure would be considerable.

The change in mindset that would put 10% or 20% of the transport budget into non motorised options might be a little advanced at this stage and not within the remit of this task group.

Hey ho all these things start with baby steps, or even pre natal kickings.

I will support the report but do need to express my misgivings.

Cllr Bill Douglas (member of the Task Group and Chippenham Area Board's Lead on Highways Safety)

The Final Report is, to me, a fair and balanced report which contains all the information, debates, discussions, and considerations that we had and then, the conclusions that we arrived at. There may be those who disagree and that is their right. However we were asked to give a report on whether the present Policy was sound, and this we did. We were not asked for an opinion on whether we felt that 20 mph should be or should not be introduced throughout Wiltshire. However, as it is an important part of present thinking on Road Safety we felt we should consider the merits of this, therefore we invited representation on that, and discussed it thoroughly, as it would apply to Wiltshire, our conclusions are also included in the report. We decided that our present Policy, via Area Boards, although rather too slow for most of us, was the best direction to take for Wiltshire and that it is within both DHS and Government guidelines.

Responses received to the original draft of the report (as contained in Appendix 1)

Bradford on Avon 20s Plenty Group

Tamsin Daddow

Thank you for sending the final report of the 20mph Policy Task Group. I have a few comments that I would like to make, many of which echo those of other readers of the report.

Firstly, I would like to know who the author of the report is. There is no mention on the document itself. Maybe no one wants to put their name to such a shameful document, full of bland generalisations and inaccuracies?

In paragraph 2 the back ground says that members of the public showed concern about the level of consultation and community opinions. These were minor issues of concern. The major issue of concern was the fact that we felt the policy didn't fully reflect DfT guidance on 20mph and was entirely out of kilter with current thinking on 20 nationally. This was again brought to the task groups attention by Rod King and members of 20splentyboa who presented a paper to the task group, which has not even been included as an Appendix. Nor has proper mention been made of the issues discussed between the group and Rod King and 20splentyboa surrounding benefits to communities in terms of social interactions, active travel, health etc etc.

Para 8. I would like to know why it is difficult to apply the evidence gathered from other authorities to the Wiltshire context, when 71% of the Wiltshire live in what can be described as urban environments?

Para 9. Why was information regarding collision reduction in Salisbury not included in the report, but a mention of a Portsmouth case study was? (Although there was no reference to back up the latter).

Para 10. Again this refers to the fact that research into social interaction benefits etc was conducted in urban environments, implying again that this isn't relevant to Wiltshire.

Para 11. Why is the research contested and by whom?

Para 15. As a resident of a busy, fast road i am acutely aware of traffic noise and any reduction in speed would be obvious to me. We do not all live in PVC window sealed houses. Has this decrease in noise been measured and researched or is this yet another example of anecdotal, unreferenced 'evidence'?

Para 20/21

I would like to see some conclusions surrounding the methodology and outcomes from the case studies investigated. Just stating that 20mph was complained about in Bath isn't a structured argument against 20mph.

Para 22. I think it is inaccurate to state that the police cannot enforce 20mph by issuing fines. Others areas in the country are eg Islington. And what about CSW? There is no mention of this in the report and about the success it is having across communities. This was launched by Wiltshire Police to great aplomb in the last few months.

Para 28. I find it surprising that there was such a lack of buy in and support for Chippenham's no need to speed campaign. Are there any figures as a result of the canvassing? Who was canvassed? National surveys such as the British Attitudes Survey have consistently shown that 72% of people are in favour of 20mph where people live, work and shop. If there was not high community buy in, then maybe the project wasn't conducted efficiently or effectively. Maybe the importance of educating drivers and communities into the benefits of 20 was overlooked?

Para 32. Again, Wiltshire is being upheld as a rural county, when according to the 2011 census 71% of the population can be considered to be living in urban environments.

Para 41. Why does the group conclude that the initial impact of any scheme is likely to be short lived?

Para 42. Which research shows that effectiveness of schemes is limited to the first 3 months?

Needless to say I was shocked and heartily dismayed on reading this document. Maybe naively, I thought a scrutiny panel would look at all the evidence impartially and make rational conclusions and not simply set out to undermine the case for widespread 20 mph limits in community areas by ignoring well regarded national research by claiming its irrelevance to Wiltshire. Nor defend its current recently adopted policy with no amendments.

Rosie Meachin

Thank-you for the draft final report. There are indeed inaccuracies.

Para 2. Our main concern was lack of observance of Dft Guidelines, not lack of public consultation.

Para 8. It is NOT difficult to apply the existing evidence to Wiltshire as a rural county, as you say. 71% of the Wiltshire population actually live in towns (according to the 2011 census).

This is a way of unnecessarily discounting all the credible existing evidence.

Para 11. The increases in walking and cycling are contested by whom?

Para 15. I would dispute that the reduction in noise would be imperceptible to residents. Where is your evidence? As a resident of a busy road, I find even a slight reduction in speed makes an enormous difference in terms of noise.

17. Many of those involved in Limpley Stoke and Westwood 20 schemes have expressed their dissatisfaction with the way the trials were conducted. These Wiltshire village trials are not extensive

enough to provide the basis of evidence for this policy, when there is so much better evidence available. It would be more useful to use evidence from one of the many well-respected national trials in existence,

such as Bristol.

23. The police can indeed issue fines for speeding in 20mph, and are currently doing so in Islington, among other places.

28. I would like to see the evidence for Chippenham's No Need For Speed failing to gain public support. If this is indeed true it would be extraordinary, as every 20s Plenty survey has indicated a majority public support for the scheme. Perhaps it was a poorly run scheme?

Also, one of the main concerns with the Policy is the exclusion of roads with speeds over 24mph (which is clearly a nonsense, as these are the only roads with a speed problem), which I don't think has been addressed at all in this report.

Does this report have an author? It doesn't read like the work of the task group.

This has clearly been written by someone with an anti-20 bias, witnessed by the fact that very little of the evidence we presented has been documented, and none of that presented by Rod King even though he is the national expert on the subject and came personally to present to the group.

Alex Machin

Thank you for sight of this draft report and your input into this process. Attached is the document with detailed comments as track changes, as requested (Please note my comments are in blue and red boxes, Rod King MBE comments are in green).

We had high hopes that this process would fully scrutinise Wiltshire's policy and make some good recommendations for where the policy would benefit from changes to bring it more into line with the intentions of DfT guidance and best practice being delivered elsewhere.

However, the scrutiny process has failed and the outcome is awful. Not one recommendation is made with regard to changing the policy itself. I would like to make a complaint, proper and full scrutiny has not been undertaken in this case. The report is largely based on anecdotal un-referenced material, which has a clear bias towards supporting the councils existing policy and practices.

As part of the scrutiny process, I submitted a written document as evidence for your consideration. This is attached. This document made 3 specific recommendations relating to where the policy would benefit from specific change to bring it more into line with DfT intentions and enabling community aspirations. This has been completely omitted from your deliberations, final report findings and even the appendices. This is extremely poor practice.

More generally the report fails by ignoring widespread evidence for the success of 20 mph schemes elsewhere, and focuses on negative results from Wiltshire's own poorly executed trials, undertaken in a handful of villages. We have heard testimonies at Area Board from representatives from these villages that they had to drive these trials forward often little support from the Council. They were undertaken without the necessary wider community engagement measures to make schemes a success.

Like others, I am also astounded that the group has decided to ignore much of the national evidence as not being applicable to Wiltshire, on the grounds that it is based in urban and not rural environs. I would mirror Margaret Wilmot's (Salisbury City Council) view, that since 71% of Wiltshire's population live in towns/urban areas these potential benefits should have been given more weight. It is a travesty that the needs of 71% of the population in Wiltshire have been ignored by this sweeping premise. Beyond this, where is the hard evidence to say that smaller rural communities may not benefit from these measures, where traffic speed has been shown to be a problem to the community?

In summary, I was disappointed to read the report, there is so much wrong with this document, and nothing much to welcome. The document is riddled with faults and un-referenced anecdotal evidence which doesn't reflect evidence or experience of 20s schemes nationally. It is clear that this report sets out to undermine the case for

widespread 20 mph limits in community areas and defend Wiltshire's current policy without change. As such the scrutiny process has failed both in terms of process and final product.

I hope that there may be scope to fully review the process undertaken and consider re-drafting this report. I look forward to hearing your response to my comments made on the document itself and this covering letter.

Please note that additional comments from Alex Machin and Rod King are included as Appendix 1 to this document.

Salisbury City Councillor – Margaret Willmot

Thank you for sight of this draft report, I appreciate the work which has gone into this.

Re factual inaccuracy – I do not think it is correct that 'the Police cannot enforce 20mph limits by way of issuing fines' (para 23). They seem to be doing this elsewhere, see for example <http://www.standard.co.uk/news/london/islington-to-start-giving-fines-to-drivers-who-breach-the-20mph-speed-limit-9778775.html> and the ACPO guidelines on the web from May 2013 (which I think are current) don't mention this – see <http://www.acpo.police.uk/documents/uniformed/2013/201305-uoba-joining-forces-safer-roads.pdf> (para 9.6). This does not agree with the table which has been presented by Wiltshire Police (Appendix 3 to the draft report) – since this is also dated May 2013 it could be the Appendix 3 table, and the statement at para 23, are based on National Guidance which has now been superseded?

It may not be a factual inaccuracy, but it is a disappointment that the Task Group has chosen to disregard the evidence presented by Salisbury City Council (& referred to in their letter attached to Appendix 4 of the draft report) which mentioned that the introduction of a 20 mph limit in Salisbury City Centre lead to a saving of about 25 casualties a year in the three years after its introduction (See Report to Salisbury District Transportation Joint Committee 15/2/2007, agenda item 14, available at

<https://cms.wiltshire.gov.uk/CeListDocuments.aspx?Committeeld=739&MeetingId=1897&DF=15%2f02%2f2007&Ver=2>).

I would take issue with the Findings in para 32, that *'having considered the national research, the Task Group concluded that it is difficult to apply the principles directly to Wiltshire as a rural county compared with the urban areas that were the subjects of research. It was considered that the trials conducted across the county were a good test of the relevance of the research to Wiltshire'*. The problem I have with this being that I feel it does not reflect where most people now live in Wiltshire, nor the trends moving forward with strategic developments being focused around existing urban areas. The 2011 census showed that the urban population in Wiltshire (247,262) exceeded the rural (223,719), and the rural figures include 87,894 who live in 'rural town and fringe' (towns with a population less than 10,000). If these 'rural town and fringe' areas (which includes places such as Bradford on Avon and Marlborough) are included in the town-dwelling population of the county there are 71% of Wiltshire's residents living in towns and 29% in villages, hamlets and isolated dwellings. I would suggest that urban research from elsewhere has a good deal of relevance to these locations, and the findings from the village trials (all within the 29% defined as villages, hamlets etc) may have rather less relevance.

I find it regrettable that the 'Wiltshire is a rural county' theme has led to the discounting of benefits in terms of social interaction and active travel (paras 10/11 as well as 32) due to these benefits being more applicable in urban areas. I would suggest that since 71% of Wiltshire's population live in towns/urban areas these potential benefits should have been given more weight.

Shrewton Parish Council – Marion Barton, Parish Clerk

Following receipt of the Final Report of the 20 mph Policy Task Group and sharing it with Councillors and members of the community, I outline our concerns below.

Considering the Department of Transport Circular 01/2013 Setting Local Speed Limits which is a guide to be used as a basis for assessments of local speed limits

The conclusion of the Wiltshire trials appears to significantly contradict the findings of the Department for Transport. It is questioned whether the application of 20mph speed limits has been correctly applied as Wiltshire appears to be the anomaly compared to other authorities.

The Department for Transport recommended scenarios for 20mph appear to be in keeping with the requirements and objectives of Shrewton village. However, Wiltshire claims that this scenario will increase pedestrian collisions. This is at odds with the DfT guidance and is questionable without detailed analysis and a greater evidence base.

Shrewton has an ageing population. The majority of traffic in the village at peak times use Shrewton as a through route. A significant number of drivers travelling through Shrewton will be younger drivers due to the demographics of the surrounding

areas. . It is well known that younger drivers are a greater risk to pedestrians and elderly pedestrians are more likely to die due to their fragility. The expansion of Larkhill Camp will encourage more young drivers to the area which, compounded with elderly villagers in Shrewton, will increase the potential for fatalities in the village.

Has funding been requested from the Ministry of Defence to deal with the inevitable impact of the expansion of Larkhill Camp and has consideration been given to what traffic measures need to be introduced to mitigate this impact? Shrewton should be considered for community funding to reduce traffic speeds and encourage a safer environment.

In essence, the proposal from Wiltshire Council to prioritise 20mph speed limits only where accidents currently exist is flawed as;

- It does not address the wider environmental considerations of the community
- Assumes incorrectly that accidents will increase in 'all' 20mph scenarios
- Does not cater for the variation in nature of differing village locations
- Does not take into account future development
- Is reactive and not flexible in planning preventative measures

Only installing 20mph zones where there are recorded injury accidents does not address the health and social mobility concerns of the parish. This policy misses the fundamental point of encouraging sustainable travel to improve health and wellbeing in the community.

Where a 20mph speed limit may be the appropriate measure to deal with traffic issues and resultant resident concerns this option should be available to villages whether or not they have casualty figures. This option needs to remain open in these cases and not constrained by a 'one size fits all' approach.

A flexible approach is required by Wiltshire to address the varying nature (demographics) of a location and not assume that all villages are the same.

The issues in Shrewton should be foreseen and Wiltshire Council should be proactive in targeting developer funding to address the concerns of the affected villages before the inevitable conflicts occur.

Anna Vaught – Bradford on Avon resident

I have read all the scrutiny material published and I am terribly disappointed. From my own experience - as a mother of three children, 3, 10 and 13 and as a local teacher - I must tell you that, on the arterial roads in BOA, people are needlessly put at risk. Others will have concerns about the town centre, I know, but I feel the greater

risk is on the bigger roads in BOA. I also feel that the scrutiny material does not exactly take into account the more urban areas of Wiltshire. It keeps me awake at night!

I have read all the statistics about impact speeds, I regularly see the danger that children from St Laurence, Fitz and Christchurch are in as they try to cross the Trowbridge, Winsley and Bath Roads, for example - and I am extremely concerned.

I have had extended conversations about speed reductions (and road safety more generally) with Parvis Khansari, our MP, the local constabulary, school staff, lots of local parents (did you know that some parents drive their children from the upper Winsley Road to Christchurch because they feel they cannot cross safely by foot?) Ruth Durrant and - in order to push through a travel plan and ask for speed limit reassessment - the governors of Christchurch School, BOA.

We regularly see near misses, cars at some speed, cars mounting the pavement and wing mirrors dashing along a whisker away from the arm of a schoolchild. I am not being over dramatic when I state this. Speed restrictions - 20mph please! - are not implemented by our schools, but I believe that reducing speed will save lives and I cannot understand the resistance to it.

I urge you to reassess your scrutiny material and do what you can to help us.

Paul Timlett – Shrewton resident

I would echo Margaret's (Willmot) comments below.

ACPO has very clearly stated in its guidance that 20 mph speed limits are as enforceable as any other speed limit. However, we are all well aware of the pressure on their resources so the announcement in the last few days that Wiltshire will no longer fund SIDs is astonishing and will only add to this problem.

What I struggle with in terms of the messaging in the report is the idea that rural areas are any different to urban. Of course there are fewer people in villages but they are no less important. This is not a numbers game. We are talking about people's lives.

Margaret makes a good point about social interaction and active travel. In Shrewton this is a very real issue for us. The excessive speed of traffic, which has been aggravated in the last year by a sudden increase in volume due to rat running from the A303, has split the village in two. An A road (the A360) bisects the village. People are now less happy to walk, let alone cycle, in the village for fear of speeding traffic. For children crossing the A360 to get to school, or the elderly/disabled crossing to reach the shop or the doctors, there is very real danger. The odd car passing at 30mph or more is one thing but the volume of traffic combined with high speed makes this an ordeal.

Shrewton currently has a population of around 1,800 people. With Army Rebasing leading to large increases in MOD housing on our doorstep this is going to increase the population in Shrewton too as we are required to find space for additional civilian housing. This will also increase traffic levels through an already busy village.

Within Army circles there is growing concern about future, larger car volumes, and the need to baseline and address existing problems. In addition to the recent traffic survey by Atkins, Army 2020 is about to conduct a separate, second traffic survey. The proposed Artillery Experience likely to be located between Larkhill and Shrewton will bring additional traffic to our village. The Army is hoping for a trade volume the equal of the Stonehenge Visitor Centre which is just over a mile away from the village. That means we will have two major national tourist attractions just outside the village.

I realise that Councils like to base decisions on analytics but that doesn't always work when the lives of communities is involved. And a rear view mirror of the world isn't always the best indicator of what's in front of you. Wiltshire needs to start putting the interests of people before traffic, and quickly.

Allen Harris – Shrewton resident, in support of the Parish Council's response

I am a resident of Shrewton and have taken an interest in the traffic issues encompassing the village that affect both the High Street and A360. Also, as a chartered highways engineer with 30 years experience in the provision of traffic management projects specialising in traffic calming and safety schemes I have knowledge in the setting of speed limits in urban and rural areas.

Having viewed the Final Report of the 20 mph Policy Task Group undertaken by Wiltshire Council I make the following points.

My interpretation of the Department for Transport (DfT) Circular 01/2013: SETTING LOCAL SPEED LIMITS is that it is guidance to be used as the basis for assessments of local speed limits which lists the following important factors when considering what is an appropriate speed limit:

- history of collisions, including frequency, severity, types and causes;
- road geometry and engineering
- road function
- composition of road users (including existing and potential levels of vulnerable road users);
- existing traffic speeds; and

road environment, including level of road-side development and possible impacts on residents (e.g. severance, noise, or air quality).

It also states that based on the positive effect on road safety and a generally favourable reception from local residents, traffic authorities are able to use their power to introduce 20mph 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.

The report concludes that the over confidence of pedestrians is contributory factor in the increase of casualties in trial 20mph zonal areas. It cannot be concluded that it is the speed limit that has caused the issues but rather the scheme layout. The 20mph zone is there to encourage a reduction in driving speeds whereas the road design determines how pedestrians and vehicles interact. If done correctly and in the right location there is no reason to presume that casualties will increase as has not been the case in many other counties. This is also the basis for the DfT circular.

Furthermore, the setting of local speed limits is about more than just roadside casualties. It focuses on health and wellbeing, tackling longer term issues such as obesity and depression that can prosper when people are discouraged from walking and connecting with the wider community due to dangerous roads, even when it is just the perception.

On 11 November 2014 C G B Mitchel, a consultant for DfT, presented to the Southern Region of Chartered Institute of Highways and Transportation (CIHT) the following statistics;

- Next to motorcyclists, pedestrians have the highest death rate per km of road used
- Due to their fragility pedestrians over the age of 65 are twice as likely to die than younger pedestrians
- Older drivers are less of a danger to other road users than younger drivers
- Younger drivers (particularly male drivers) are 3 to 4 times more likely to kill pedestrians than older drivers

These are important statistics particularly in relation to Shrewton which is developing residential properties aimed at senior citizens. Coupled with the potential development in Larkhill leading to younger drivers using Shrewton as a through route there is the potential for serious injuries should preventative measures be ignored. The proposal to prioritise accident sites for the implementation of 20mph zones appears to me to be erroneous. It does not address villages such as Shrewton which, due to continually increasing traffic, have a greater likelihood of resultant casualties in the future.

Priorities do need to be risk assessed and based on the holistic benefits of the community and potential incidents rather than just previous accidents that may or may not occur again.

The task force proposal restricts this through a broad-brush approach that treats all situations as the same. This is not the case and should not be treated as such and the decision to apply 20mph zones strictly in priority of accidents is not the answer.

Funding from developments such as the potential Larkhill Camp expansion should be targeted where it is likely to have the greatest impact. Measures need to be designed and costed now to mitigate the risks to Shrewton residents whilst there is an opportunity to target the necessary funds.

In addition, measures should be tied in with required maintenance works, such as pavement resurfacing required in the village so as to avoid removing newly laid roadmarkings and make savings on set-up, site management and traffic management costs.

The provision of 20mph speed limits should be located in the right place, at the right time and for the right reasons as per the Department for Transport's circular. Flexibility in the application of 20 mph speed limits will make this so.

Cllr Rosemary Brown (member of the Task Group)

The following has been taken from the Brake webinar featured on

1 October:

Why travel at 20 mph?

- Fewer casualties
- Healthy, active lifestyles
- Sociable communities
- Less pollution
- Lower costs

20 mph speed limits in BANES – good practice in going 20 mph

"Major streets could be subject to 20 mph speed limits where there are or could be significant journeys on foot and/or where cycle movements are an important consideration and this outweighs the disadvantage of longer journey times for motorised traffic."

(Department for Transport Guidelines – Circular)

Why 20 mph?

- . Can cover all residential streets cheaply and quickly.
- . Make streets safer for people on bikes and on foot.
- . Make streets safer for children to play.
- . One of the Cities Fit for Cycling campaign's 10 points.
- . End domination of motorised vehicles and give streets back to people.

Cultural change

End domination of motorised vehicles.

Give residents more control of their own streets.

Give precedence to walking, cycling and public transport. Manual for streets - shared space.

Promote understanding, tolerance and awareness in all users of our streets.

Camden London Borough Council:

What arguments were put forward during the consultation?

1. Road safety

We focused on the road safety benefits of 20mph, which are hard to argue against.

We used statistical examples from national DfT guidance and from previous local implementation of 20mph to show how small reductions in speed can make a real difference in reducing casualties.

Cambridge

Facilitate sustainable transport modes:

- Improved conditions for vulnerable road users
- Reduction in pollution levels
- Public health benefits
- Reduction in the severity of accident injuries
- Potential improved traffic flow
- More pleasant street environment

Misconceptions

“Cars aren’t designed to do 20mph”

“The cyclists win again”

“I’ll be late for work everyday”

“Being stuck in second gear will increase pollution and use more fuel”

“What’s the point, when the Police won’t enforce it”

“Signs & lines only is a waste of money”

“Congestion is bad enough as it is, this will only make it worse”

The above are my views on the subject and I drew the Task Group’s attention to the fact that I had watched the webinar.

I would like to see the above incorporated into the current report being brought before the Environment Select Committee on 9 December.

Wiltshire Council
Environment Select Committee
9 December 2014

Supplement to the 20 mph Policy Task Group's Final Report
Appendix 1 – Track changes on the original draft of the report from Alex Machin and Rod King

Wiltshire Council
Environment Select Committee
9 December 2014

Final Report of the 20 mph Policy Task Group

Purpose

1. To present the conclusions and recommendations of the 20 mph Policy Task Group for endorsement.

Background

2. The draft policy and consultation report was considered by the Environment Select Committee on 10 December 2013. Four members of the public addressed the Committee and expressed concerns about the level of consultation that had taken place and to what extent community opinions had been taken into account when creating the draft policy. There were also concerns that the requirements for the creation of a 20mph limit or zone were too restrictive.
3. The trend towards an ageing and more vulnerable society was also highlighted, and whether increased frequency of 20mph zones would be of positive benefit, as well as other options such as shared space schemes. Shared space is an urban design approach which seeks to minimise demarcations between vehicle traffic and pedestrians, often by removing features such as curbs, road surface markings, traffic signs, and regulations. This approach has been used as part of living streets in residential areas in a bid to create uncertainty in drivers to reduce speeds and collisions.
4. The Committee resolved to set up the Task Group to review and help develop the policy as it was enacted.

Methodology

5. The Task Group comprised the following membership:

Cllr Peter Edge (Chairman)

Comment [A1]: Each speaker stated at the start of their 3 mins that they were representing interests of wider community groups, not speaking as individuals. This should be reflected more accurately here. The speakers were: Anne Henshaw (Calne Community Area Partnership), Ashley Halls Ph.D. Winsley and Turleigh 20s Plenty and Turleigh Traffic Action Group, Gill Anlezark (Cycling Opportunities Salisbury), and Alex Machin 20s Plenty Bradford on Avon.

Comment [A2]: The main concern raised was that the County policy is out of kilter with DfT guidance and best Practice currently being implemented elsewhere. The Wiltshire policy actively discourages the potential for 20s schemes in Wiltshire. Alongside this we did also raise concerns with regard to the poor consultation process undertaken.

Cllr Rosemary Brown
Cllr Bill Douglas
Cllr Mollie Groom
Cllr Jose Green
Cllr Magnus MacDonald

6. From the outset, the Task Group sought to work towards the following outcomes:
 - I. To explore the adequacy of the current policy with reference to a range of research and witness accounts;
 - II. To review the policy as it was enacted in terms of whether it will enable the delivery of reduced numbers of casualties and increased general road safety; and
 - III. To report back to the Environment Select Committee with recommendations for endorsement
7. The Task Group met on four occasions and received written and/or verbal evidence from the following witnesses:
 - Cabinet member for Highways, Streetscene and Broadband
 - Associate Director for Highways
 - Traffic Engineering Manager
 - Principal Traffic Engineer
 - Representatives of the 20s Plenty Campaign
 - Representative from the Devizes Community Area Partnership
 - Wiltshire Police
 - Shrewton Parish Council
 - Salisbury City Council
8. The Task Group considered a variety of research in order to test the efficacy and basis of the testimonies that they had heard. A list of research considered is available in Appendix 1. It should be noted that the national research conducted into the effectiveness of 20 mph schemes has not been focused on villages and similar rural counties; it was noted therefore it is difficult to apply the evidence gathered to the Wiltshire context.

Comment [A3]: Rod King MBE 20s Plenty National Campaign and Bradford on Avon 20s Plenty Group.

Comment [A4]: Assumptions made in this report should be clearly referenced to the evidence that led to these assumptions. This is currently not the case, many assumptions appear anecdotal as a result.

Comment [A5]: This is an unacceptable assertion, most of the Wilts population live in the 21 towns and cities. Further, why can't the findings be applied to rural communities such as large villages, especially where there is a community need – Other counties have done so...

Research

The following summarises the findings of the topical research that the Task Group considered.

Reduction in the number and severity of road casualties

9. The percentage of pedestrians killed when hit by a car reduces as vehicle speed is reduced. One study found that at 20mph there was a 2.5% chance of being fatally injured, compared to a 20% chance at 30mph. However, there is no evidence to suggest that any reductions in the number of collisions are directly attributable to 20 mph schemes. In one case study in Portsmouth the

number of collisions actually increased, serious injuries increased by 57% in 2011 compared to 2010 (from 89 to 143). Oxford also experienced increased serious injuries in each of the two years following 20mph implementation. It is suggested that the reason for this is that pedestrians are lulled into feeling safer and are thus more likely to take less care (such as crossing the road without looking, often while using their phone), while vehicles are often travelling at much the same speeds as previously.

Comment [RK6]: Actual serious casualties on 20mph roads increased from 18 to 21. On 30mph roads from 56 to 94. Note that there was a larger overall increase in St Helens which had not implemented any 20mph limits. Members should not confuse correlation with causation.

Comment [RK7]: The increase was for the whole of Oxfordshire rather than Oxford itself.

Comment [RK8]: There is no evidence for this. It is only conjecture based on an uninformed and inaccurate analysis of statistics.

Social Implications and Public Health

10. Research demonstrated that social interactions correlate with traffic levels, in that where the volume of traffic is lower and travelling at slower speeds communities were more able to interact socially. This has also been found to be the case in terms of providing increased opportunities for children to play in their neighbourhoods where a fear of speeding traffic was previously an issue. However, this research was conducted in an urban area.

Comment [MN9]: There is no mention here of the wider quality of life benefits to the community in terms of reduction of perceived threat from traffic and improved conditions for more vulnerable members of the community.

Comment [MN10]: Most of WTs community live in Towns which are urban areas

11. Reducing traffic speeds has been demonstrated to encourage people to walk and cycle more for local trips in urban areas, with the associated benefits of tackling obesity through physical activity with up to 20% increase in take-up due to the schemes. However this is contested.

Comment [RK11]: In most communities it is irrelevant whether there are 1,000 or 10,000 residents

Air Quality

12. The Department for Transport acknowledge that 20mph schemes should contribute to reduced emissions by enabling a smoother driving style. Results suggest imposing a 20mph speed limit would have mixed effects on emissions from a single vehicle, and it can be supposed, ambient air quality. Estimated NOx (mono nitrogen oxides) is increased for petrol vehicle and decreased for diesel (with the expectation of a negligible increase for large diesels). Large vehicles exhibit an increase in emissions, but not a substantial one. The inefficiencies in fuel consumption of travelling at lower speeds are demonstrated by the trend in CO2 emission factors.

Comment [A12]: What is your evidence for this? This statement needs to be validated. Bristol undertook well researched pilots prior to rolling out the scheme across the city. The Pilots found:
▪ Increase in counts for walking ranged from 10% increase to 36%
▪ Increase in counts for cycling range from 4% increase to 37%.
(Bristol City Council 20 mph Limit Pilots Monitoring Report March 2012)

Comment [RK13]: You mean contested by Alliance of British Drivers rather than any independent, government or academic institution. See Academic review cited in our press release http://www.20splentyforus.org.uk/PReI/PH_Evidence.pdf

13. In general it is concluded that it is incorrect to state that a 20mph speed restriction will lead to greater pollutant emissions for vehicles. Another significant aspect of this analysis is that average speed models do not have the resolution required to assess emissions in urban environments.

Comment [RK14]: The only trend is that reduced speed produced by congestion (i.e. stop/start) increases emissions. Gov says that unless an unnecessarily low gear is used the emissions will be less.

14. The most significant benefits would arise if the introduction of 20mph can encourage more people to leave their cars at home for local trips. It is not apparent whether this is the case however.

Comment [A15]: Where are your references for this evidence?

Traffic Noise

15. Driving at 20mph has been found to reduce traffic noise; the benefit of a signs-only scheme is that drivers can adopt a smoother driving style than if

Comment [A16]: Lots of projects have shown trends in this direction after imposition of 20 limits?

they were driving through a calmed zone with engineering features. However, small reductions in noise that may be achieved will be imperceptible to residents.

Trials conducted in Wiltshire

16. In recognition of the increasing number of requests for 20mph limits resulting from the publishing of revised guidance from the Department for Transport in the Circular 'Setting Local Speed Limits' (01/2013), it was accepted that clear, evidence based guidance should be produced to establish Wiltshire's own local policy framework suitable for its rurality. In order to ensure the adopted policy is predominantly 'evidence led' trials of 20mph limits were conducted at a number of selected village locations during the 2010/11 financial year.
17. A two-stage assessment process was undertaken to select the villages to be used, these were as follows: Great Cheverell, Limpley Stoke, Great Bedwyn, Westwood and Biddestone.
18. The key objective of the trial was to measure the impact of 20mph limits in rural village environments through the signs alone and without the use of traffic calming features typified by urban 20mph Zones such as road humps or chicanes etc. It should be noted that each site was consulted on the specific approach to be taken.
19. At each trial site a number of monitoring 'stations' were established to collect automatic traffic count data both before and after the implementation of the 20mph limit. The 'stations' were located at regular intervals throughout the study area with a focus on the main through-routes to traffic. The agreed number for each village depended on its overall size and length of roads within the new restriction.

Comment [A17]: Rurality? This is not a word...apart from this most of the Wiltshire population live in Towns/Cities? We are talking about 20 limits where there are concentrated community areas.

Comment [A18]: What about Wiltshire taxpayers in the towns/cities why is their existence not addressed within this report? The trial villages have given v negative feedback to the Area Board, in terms of the lack of support from the Council to implement these trials, and the omission of wider 'soft measures' approach to ensure they were successful.

Comment [RK19]: Rurality is not an issue. DfT guidance advocates 20mph for urban areas and villages.

Comment [RK20]: No-one is implementing with "signs only" but include engagement and education. Also most are authority-wide therefore increasing buy-in and compliance. Wiltshire schemes are atypical to what is being proposed.

Other Scrutiny Panels

20. The Task Group considered a summary of the findings of a selection of scrutiny panels at other Local Authorities (Appendix 2) and looked at some example reports, such as Portsmouth City Council and Gloucestershire County Council (listed in Appendix 1) to seek guidance on their methodology
21. It is reported in Bath and North East Somerset that, after potholes, 20 mph limits and zones are amongst the most complained about highways issue and have often required extra engineering features which are not always supported by the public.

Comment [A21]: Reference, no context provided – were soft measure (PR campaign) uses to highlight the benefits of 20?

Comment [RK22]: This is irrelevant and anecdotal.

Comment [MN23]: Why has only this case example been included and nothing about the findings of lots of scrutiny panels and case studies where 20 has been implemented successfully? This provides a completely skewed view against 20 which is not reflective of national findings.

Police Perspective

22. The Police submitted written evidence (Appendix 3) to the Task Group which demonstrated their support for schemes whereby the restriction is appropriate, has a proven need, clear and that motorists have the ability to comply. It was highlighted that it is rare for 20mph schemes to be implemented in areas where there is a Killed and Serious Injury risk. The Task Group noted that Wiltshire does not have a large number of roads that meet these criteria and that those that do would not be appropriate for a 20mph scheme. Due to this it was acknowledged that the schemes are only one part of a whole toolkit that the Council may use to improve road safety.

Comment [A24]: Please define what you mean by this statement?

23. It should be noted that the Police cannot enforce 20 mph limits by way of issuing fines. Where applied, a 20mph limit should be largely self-enforcing and evidence be provided for the proposed location that this is likely to be the case prior to implementation as the police are unable to provide additional resource to enforce a 20 mph limit. Where 20 mph limits do not achieve broad compliance, the police consider the location to be unsuitable for such a limit.

Comment [MN25]: Fines should be issued in the same way you would for any broken speed limit. Other areas, e.g. London, are now fining for breaking 20 limits. ACPO has issued v clear guidance to forces on this issue.

Comment [RK26]: This is inaccurate. ACPO guidance clearly allows and advocates issuing of speed awareness courses, FPNs and magistrates court summons, as well as community speed watch warning letters

Local Perspectives

Salisbury City Council

24. The Task Group received a letter from Salisbury City Council (Appendix 4) expressing concerns that with regard to the constraints of the current policy. It was indicated that more effective selection of schemes could be made if all the proposals for a given year were presented at the same time, and if input from a Wiltshire Council Highways officer was provided to allow decisions to be more evidence based regarding their selection and prioritisation. It was also highlighted that such resource would add more value if utilised earlier in the process rather than only at the stage whereby the C.A.T.G. (Community Area Transport Group) is involved.

25. It was raised that the current piecemeal approach is not ideal and that more complete roll-outs across residential areas would send a clearer message about the priority which should be given to pedestrians and cyclists, thus aiding the overall improvement of road safety.

Comment [RK27]: That is exactly what is being done elsewhere .

Shrewton Parish Council

26. The Task Group received a letter from the Parish Council (Appendix 5) expressing grave concern over the use of the village as a 'rat run' and the impacts on the community, also that the public perception of the problem is not being adequately taken into account. This was raised in particular relation to the need of the community to feel safe when walking or cycling in the village; health (air quality) or environmental (noise pollution) issues. It was noted that there seems to be no process for assessing the real damage that inappropriate traffic speed does to communities and that the Parish Council would like to see a lot more positive, proactive engagement.

Comment [RK28]: 20mph limits mat be used with filtered permeability to avoid rat-runs.

27. The Task Group considered the above perspectives to compare a large urban area with a rural area and their respective issues.

Chippenham 'No Need for Speed' Campaign

28. It was reported that in canvassing local residents' opinions on 20 mph restrictions and installing signage for the 'No Need for Speed' campaign it became apparent that there was a lack of community support and buy-in. Furthermore, no impact by way of speed reductions was registered. It was also noted that many newer residential estates are designed to facilitate lower speeds.

Comment [MN29]: By whom, where is the evidence- this is purely anecdotal again.

Comment [RK30]: This is typical of schemes outside Wiltshire and so draws conjecture as to whether methods used are appropriate.

Alternative examples of speed and road safety management

29. The Task Group considered the use of 'Shared Space' schemes as an alternative method of managing speed and road safety. Although this type of scheme was of great interest to the Task Group and was deemed to facilitate the reduction of speed and improved road safety more efficiently than 20 mph schemes, the provision of alternatives lies outside of the Task Group's remit.

Comment [MN31]: These schemes are completely cost prohibitive. Signed only schemes offer much better value for money, which means that they can be rolled out over much larger areas than hard engineered schemes- benefitting more of the community.

30. The Task Group heard that in other European countries, some cities have created areas that are 'anti-car' by promoting public transport, increasing the amount of pedestrianised areas and making places more cycle-friendly. These schemes were put in place in order to discourage the use of cars due to the difficult driving conditions and the readily available alternative transport options.

Comment [RK32]: Cars are of course inanimate objects and do not vote. The local authority only has a responsibility to humans.

31. In many other counties traffic signal lights have also been used as a tool for managing speed in terms of enabling them to measure speed and stop vehicles that exceed the speed limit and hold them for several minutes. This has been used to discourage speeding and teach drivers that they gaining nothing from doing so.

Comment [RK33]: So has enforcement and engagement/education.

Findings

32. Having considered the available national research, the Task Group concluded that it is difficult to apply the principles directly to Wiltshire as a rural county compared with the urban areas that were the subjects of research. It was considered that the trials conducted across the county were a good test of the relevance of the research to Wiltshire.

Comment [MN34]: So discounting all national evidence and basing your entire review on a handful of poorly run, some would say, set up to fail, village trials run by the v same highways dept who drafted the policy you were meant to scrutinise - This is extremely poor scrutiny practice.

It is a nonsense to state that the evidence from elsewhere is not transferable to Wilts is a rural county - Wiltshire has 21 towns and one city where 1,000s of people live, where this experience is directly transferable. How has this been addressed in your report and recommendations?

33. The trials showed an average speed reduction across all sites of 1.6mph. With the exception of a single monitoring station, the biggest reductions were witnessed shortly after implementation. Thereafter the figures remained largely static with only minor variations in 'mean' speeds as drivers became accustomed to the limit.

Comment [MN35]: Was PR undertaken to promote the purpose of the schemes in the local and wider community? In other areas this has been key to scheme success.

34. Collision data was also reviewed and it was concluded that it is impracticable to identify any obvious trend relating to casualty reduction resulting from the introduction of 20mph limits. It should be noted that near misses are not recorded due to the difficulty in recording them and ensuring the accuracy of the records. Area Boards and C.A.T.G.s are authorised to facilitate the collection of such data and have been invited to do so, however there has been a lack of take up on **this**.

Comment [MN36]: Why doesn't the council show some leadership with this? You could have a web page where residents can lodge location, date, detail of near misses? This needs to be well advertised.

35. Approximately 12 months after the trials were completed community views were canvassed via household surveys with a 58% response rate. Overall, residents perceived vehicle speeds prior to the introduction of the 20mph limit to be high with some 85% of respondents feeling that speeds were either 'very high' or 'sometimes high' in their respective villages. Nearly 53% of respondents across all sites reported that speeds had 'decreased a little', which supports the evidence from the recorded 'after' data. Across all sites, an average of 29.6% felt the reduced limit had made no difference to vehicle **speed**.

Comment [RK37]: No engagement, no universality, no benefit for most drivers on home street, no enforcement. Frankly no vision either.

36. In terms of overall satisfaction with the 20mph limit, some 56% of respondents were either 'satisfied' or 'fairly satisfied' compared to 21% shown as 'fairly dissatisfied' or 'very dissatisfied'. Despite this, there seemed to be a relatively even split between those making positive comments and those making negative ones.

37. The effect of the 20mph limit on qualitative community benefits appeared to be modest, with the majority of respondents reporting little change on issues such as 'less through traffic', 'increases in pedestrian/cycle activity', greater on-street social interaction and improved community environment'. **On the question of whether or not the 20mph limit had contributed to a 'safer environment' 45% of respondents either 'agreed' or 'strongly agreed'**. This, together with the overall feedback of communities is demonstrative of the mixed views on the effectiveness of the schemes. Full details of the trials and community responses are attached.

Comment [MN38]: The opposite was reflected in the presentation given to Bradford on Avon area board by Westwood parish council – where it was stated that the community had perceived improved traffic safety conditions.

38. A key issue raised by the public was in relation to Council engagement with communities and communication particularly in relation to where a scheme is refused; the Task Group was informed that a full and timely explanation as to why this is the case will be provided.

39. It must be noted that the Policy is open to evolution in light of new evidence. The Department for Transport has commissioned a research report on the successes and failures of 20mph schemes so far and how limits may be best used. This is due in 2017. Amendments are also due to The Traffic Sign Regulations and General Directions in 2015 which may result in a reduction in the cost of implementing new **schemes**.

Comment [RK39]: As WCC seems reluctant to consider the evidence that exists then it would seem irrelevant to wait until 2017.

Conclusions

Having considered the evidence, the task group concluded the following:

40. Based on the limited results and benefits seen from the trials and research, discussions with witnesses and officers; the Task Group concluded that in many areas 20 mph limits would not justify the costs involved in implementation, particularly in light of the probability that the initial impact of a scheme is likely to be relatively short lived and the longer term benefits inconclusive. *It was also concluded that whilst area wide 20mph limits in Wiltshire should not be completely ruled out, the use of blanket 20 mph limits should only be considered where there is robust supporting evidence as to their likely success.* Where individual needs are evidenced and justified, 20 mph limits can be a useful tool and this can be catered for under the current policy and existing methods for selection via C.A.T.G.s and Area Boards.
41. The Task Group recognises the importance of the perception of communities and *that residents in locations suffering from excessive speed and associated issues may be best placed to determine how the problem can be dealt with. However, the task group is concerned that implementing schemes in locations where it is evident that broad compliance will not be achieved, could lead to community and/ or driver apathy and potentially lead to a general disregard for speed limits in the area.* It was also raised that where speed limits do not achieve broad compliance this is a waste of valuable funding which could be spent on schemes that are well evidenced to have a good chance of success. There was also concern that giving priority to community perception above statistical evidence that a 20 mph scheme will improve road safety and reduce speed significantly may create unrealistically high expectations.
42. Although statistics do not show a significant reduction in speed in some areas, the public perception is often that even a small reduction is a success. However, research shows that even in these circumstances the effectiveness of schemes can be limited to the first three months; is highly dependent on the specific location of the scheme and that public perception overall may be inadvertently damaged if the location is incorrect. This demonstrates the polarity of views and the interpretations of the evidence presented to the Task Group. It must be noted that whilst the Task Group valued highly the witness testimonies, which demonstrated that public perception of success is not reliant on tangible results and statistics, scrutiny is necessarily based on substantive evidence.
43. It was accepted that the Council's policy is to use funding in a targeted manner to tackle specific issues and that this is the correct approach in the current economic climate. The Council's overall aim is to reduce road collisions, which largely occur on rural roads; and at bends or junctions, therefore funding for measures that achieve this, such as appropriately located 20mph limits, are prioritised based on accident statistics. It must be noted that overall, Wiltshire has a lower level of injury collisions than many neighbouring authorities and that the budget available should remain focused on those areas that have a high collision rate in order to

Comment [A40]: Limits are cheap to implement and cost just £333 per street in Portsmouth (the total cost of an authority with 187,000 residents to implement 20 mph limits was £475,000). This is equivalent to 2 junctions with traffic lights.

Comment [MN41]: What evidence for this apart from the handful of half hearted trials...How can you conclude this when other areas have undertaken wider scale research displaying significant benefits of schemes which make them good value for money?

- Transport for London has found reductions in casualties of between 23% and 47% in 20mph areas.
- Warrington reported an 800% (1:8) First Year Rate of Return (FYRR) on casualties avoided.

(Warrington Borough Council – 20mph Speed Limit Pilots Evaluation Report – Para 13.10).

There are numerous other examples nationally...

Comment [MN42]: This is the opposite approach to that applied elsewhere, and suggested by DfT. Area wide limits are meant to be encouraged, especially where communities feel the need for speed reduction, where their safety and quality of life is being compromised by current speeds. Other Authorities have gone for a blanket approach to 20, where a strong case has to be made for roads to be out of the 20 limit not the other way around.

Comment [RK43]: What areas has it considered. With implementations of 20 limits now in 20% of country then why only a couple of authorities looked at and with no reference to the benefits accrued.

Comment [MN44]: It should not just be about compliance to the limit but about reducing speeds overall. In Portsmouth they found that roads with the fastest speeds, had the greatest speed reductions by this didn't mean there was speed compliance. International research has shown that just a 1mph reduction in speed leads to an average of a 5% reduction in casualties (Taylor, Lynham and Baruya, 2000).

... [1]

Comment [MN45]: Yes and you have chosen only to represent your internal view – there is no information here from our evidence session with you. This reads a one sided rebuttal of your existing policy.

Comment [MN46]: We signposted you to plenty of other Authorities who had demonstrated success in tangible results and statistics. This is v lazy just to look at your own evidence and not compare with other authorities findings especially as you say the polarity in views is so extreme...

reduce the overall number of casualties on the network. The village trials of 20mph speed limits demonstrated no impact on reducing the number of collisions or casualties.

Comment [RK47]: And was that because they didn't have any to begin with. Talk about "unrealistic expectations"

44. The Task Group concludes that the Policy, whilst being a cautious interpretation of the Department for Transport guidance, is compliant, fit for purpose and allows for local discretion. It has been demonstrated that where schemes have been unsuccessful it is damaging to public perception and frustrating for those communities that the schemes are intended to serve. It is therefore prudent to ensure funding is only allocated to those schemes that meet the requirements of the policy and where evidence demonstrates overall compliance is to a 20mph limit is likely to be achieved.

Comment [MN48]: How – when you have made this impossible. Locals are required to prove scheme success prior to implementation, only permitted in areas with high level of collisions/accidents/deaths, there is no funding available as it is not viewed as a priority – how exactly is this allowing for local discretion?

45. Local discretion could potentially be increased by allowing C.A.T.G.s and Area Boards to facilitate any number of schemes, provided that they do so within the confines of the current funding, rather than prescribing that only 2 schemes per year may be implemented. This would allow for multiple smaller schemes or one large scheme as per the needs of the community. It should be noted that the Task Group considers that the allowance of only 2 schemes per year does carry the benefit of ensuring that they are carried out thoroughly in terms of adequate resourcing and advice, resulting in controlled implementations which stand more chance of success.

Comment [RK49]: Where is the analysis of "why" they have been unsuccessful. Lack of engagement, education, enforcement, wide-area?

Comment [MN50]: Not likely to have a number of schemes with the current low level of funding provided.

46. It was deemed that 20 mph schemes are only one part of a whole tool kit at communities' disposal to improve road safety and reduce speeds, as these issues are multi-faceted. The Task Group concluded that communities should therefore be encouraged to investigate alternative methods of addressing their concerns prior to seeking a 20 mph limit and take advice from Council officers as to which method may best address the specific problems faced in their locality. Alternative methods may include: protected pedestrian paths, additional footways or cycle paths. An important factor that cannot be addressed by 20 mph limits alone is the attitudes of drivers; improving driver attitudes towards 20 mph limits, other road users and appropriate driving styles in residential areas is paramount to resolving the problem. The outcome sought by interest groups was supported by the Task Group, only the method of achieving it was disputed. It should be noted that the Task Group felt that whilst interest groups are members and representatives of their communities, they do not necessarily represent the views of whole communities. As seen in the responses to the trials not all community members supported the limits.

Comment [MN51]: Missed the point here that a 'good' 20 scheme rolled out by an Authority includes public promotion of these elements to ensure scheme success. We signposted you to the work of University of West of England – Soft Measures for 20 mph limits . They estimate that 10% of scheme budget should be allocated to soft measures to ensure success by changing driver attitude and behaviour.

47. The Task Group concluded that the current Policy supports the Council's vision of 'creating stronger and more resilient communities' whereby 'people work together, solve problems locally and participate in decisions that affect them'. *This may be promoted further by encouraging a more flexible approach to interpretation of the Policy by the Council, C.A.T.G.s and Area Boards when considering applications.*

Comment [RK52]: What vision. There is no evidence in this document of any "vision".

Recommendations

Having considered the evidence, the Task Group recommends that:

1. Local road safety initiatives such as 'No Need for Speed', are pursued by communities with the support of C.A.T.Gs and Area Boards;
2. Communities are encouraged to pursue alternative funding, including undertaking their own fundraising to implement schemes that are unable to be catered for by C.A.T.G.s and Area Boards and increasing their precept;
3. The report on 20 mph limits outside of schools comes to the Environment Select Committee and be progressed;
4. To allow C.A.T.G.s and Area Boards to facilitate any number of schemes that they believe suits the needs of their communities and makes best use of the existing funds allocated;
5. That the Task Group reconvenes in 2017 to review the Policy in light of the research commissioned by the Department for Transport and the impact of amendments to Traffic Regulation Orders which may decrease the cost of implementation.

Comment [A53]: As part of our evidence session I submitted a 3 page written submission. I requested in 3 bullets points that the scrutiny group look at re-drafting 3 v specific areas of the current policy to reflect DfT guidance.

The concerns raised in this submission have not been addressed in anyway in this report. It is extremely poor practice that no reference is made to the evidence submitted in the appendices or the document itself.

Comment [A54]: It is a travesty that not one recommendation is made to change the drafting of the policy in any way. None of the concerns of the community have been addressed through this scrutiny process.

Comment [MN55]: Why when it was stated above that the 'No need for speed scheme' did not work and had no public by in?

Comment [RK56]: Complete hand-washing. The purpose of the DfT review is to consider evidence already existing and bring it together consistently rather than to stop traffic authorities doing same.

It should not just be about compliance to the limit but about reducing speeds overall. In Portsmouth they found that roads with the fastest speeds, had the greatest speed reductions by this didn't mean there was speed compliance. International research has shown that just a **1mph reduction in speed leads to an average of a 5% reduction in casualties** (Taylor, Lynham and Baruya, 2000).