

**THE ROYAL SOCIETY FOR THE PREVENTION OF ACCIDENTS
RoSPA**

**RESPONSE TO THE
DEPARTMENT FOR TRANSPORT'S
CALL FOR COMMENTS ON REVISION
OF DfT'S SPEED LIMIT CIRCULAR**

1 February 2010

This is the response of the Royal Society for the Prevention of Accidents (RoSPA) to the Department for Transport's 'Call for Comments on Revision of Speed Limits Circular'. It has been produced following consultation with RoSPA's National Road Safety Committee.

RoSPA thanks the Department for the opportunity to comment on the revisions to the Speed Limit Circular.

20 mph Zones and Limits

The main proposed changes are:

- *Draft revised text is at Appendix A to this letter.*
- *We want to encourage highway authorities to introduce, over time, 20 mph zones or limits into streets which are primarily residential in nature and into town or city streets where pedestrian and cyclist movements are high, such as around schools, shops, markets, playgrounds and other areas, where these are not part of any major through route.*
- *We want to make it clearer that highway authorities have flexibility in the use of 20 mph zones and limits, and should apply the option best suited to the local circumstances and that brings most benefits in terms of casualty reductions and wider community benefits.*
- *We want to draw attention to the initial evidence from the trial of wide area signed-only 20mph limits in Portsmouth, and want to make clear that 20 mph limits over a number of roads may be appropriate elsewhere.*
- *We are setting out that we will consider the requirements for calming measures in 20 mph zones as part of the DfT's Traffic Signs Policy Review, which was announced in September 2008. In exceptional cases, the Department could also look at giving special authorisation for the use of 20 mph repeater signs, including with accompanying painted roundels, instead of calming measures, on individual streets with low average speeds within a 20 mph zone. Decisions will, however, be made on a case by case basis.*
- *In addition to better road safety outcomes, we will also look to contribute to the DfT's other goals, including for the economy, emissions, equality of opportunity and quality of life.*

RoSPA Response

RoSPA strongly supports the use of 20 mph zones and limits as they are an effective means of reducing road accidents and casualties, especially amongst our most vulnerable road users, as the risk of injury from an accident at 20 mph or less is significantly decreased. 20 mph schemes can, and should, be supported by other measures to help drivers drive at safe speeds, and to enforce the limits for those drivers who choose to ignore them.

Traditionally 20 mph zones required physical measures, such as speed humps, to achieve compliance with the 20 mph limit. These zones have been shown to be very effective at preventing injuries and research has shown that in London they reduced casualties by around 40%¹. However, recent schemes, such as that in Portsmouth, where only speed limit signs are used, also seem to be effective. Initial evidence suggests that such schemes can be successful in reducing speeds and casualties in the right conditions. Schemes that do not require physical measures would be quicker and less expensive to install. We agree that DfT guidance should be amended to reflect this.

¹ Effect of 20 mph traffic speed zones on road injuries in London, 1986-2006: controlled interrupted time series analysis http://www.bmj.com/cgi/content/full/339/dec10_3/b4469

However, we suggest that the guidance should be clear about when and where 20 mph limits, without physical measures, are likely to be appropriate and when and where 20 mph zones, with physical measures, are likely to be more appropriate.

The use of type-approved safety cameras to enforce 20 mph limits should also be considered, if the Transport for London trial proves successful.

Major Through Routes

The second bullet point implies that 20 mph zones and limits should not be introduced on residential roads that are part of a major through route. We suggest that a definition of 'major through route' be provided. There is a dilemma in that many major roads in urban areas are residential and shopping areas, which are exactly the type of environment in which 20 mph speed management is desirable, but if they are also major through routes, such measures may cause significant congestion. However, there may be places on roads that are part of a major through route where it would be possible to install a 20 mph limit or zone without causing unacceptable disruption. Therefore, a clearer definition and guidance may help.

Signs

The penultimate bullet point concerning the use of signs and roundels does not seem strong enough to RoSPA. It is important that drivers are given the information they need to drive at appropriate speeds and speed limit signing is an extremely important part of this.

The over-riding principle of speed limit signing should be to ensure that the limit is always as clear and obvious as possible. Drivers should not be expected to work out the speed limit; it should always be clearly and consistently marked. This requires greater use of speed limit repeater signs and speed limit road markings. Local publicity campaigns explaining the reasons why certain roads have lower speed limits than drivers may believe are justified would also be useful.

Repeater signs are not just an issue for 20 mph areas. RoSPA recommends that a trial of using 30 mph repeater signs should be conducted. If this was effective, the prohibition on using repeater sign on 30 mph roads with street lamps should be rescinded to enable Highway Authorities to put repeater signs or roundels on roads which have a speeding, or speed-related crash, problem. Repeater signs are not the only way of informing drivers of the prevailing speed limit. Other methods should be developed.

General Comment

Traffic calming, and in particular 20 mph zones, are sometimes criticised with unproven claims that they cause more deaths than they save by slowing down the response time of the emergency services, for example, ambulances responding to heart attack victims. RoSPA is not aware of any research that has properly assessed or quantified these concerns. The case for traffic calming needs to be more clearly and unequivocally promoted.

Rural Speed Limits

The main proposed changes are:

- We propose to restructure, remove repetition and rationalise the advice contained in chapter 6 on rural speed management and Annexes D and E of the Circular.
- We will reiterate our call for speed limit reviews by 2011, making it clearer that the emphasis for highway authorities should be on carrying out speed limit reviews on 'A' and 'B' class national speed limit single carriageways and adapting lower limits where the risks are relatively high and there is evidence that a lower limit would reduce casualties, by the end of 2011. Instead of focusing on A and B roads, authorities may choose to use the Institute of Highways and Transportation (IHT) definition of 'upper tier' roads and focus on these.
- Recognising pressures on resources, we are not asking for a comprehensive speed limit review of minor rural roads, but only of those C and unclassified roads (or those that fit the IHT definition of 'lower tier' roads) that have the highest risk of collisions or where there is particular local concern about the speed limit.
- We also propose to withdraw the technical assessment tool for rural speed limit reviews, contained in Traffic Advisory Leaflet 2/06 and referred to in the current Circular. This approach is based on the informal feedback we have received from users of the tool. We propose to leave in place the principles underlying the tool, and set them out more clearly in the Circular.
- We will also include reference to new Road Safety Foundation EURORAP risk mapping of A roads, charting the relative accident risk, which should assist highways authorities with speed limit reviews on those roads. Maps can be found on the Road Safety Foundations' website.
- Evidence from the use of average speed cameras shows that they are effective in reducing speeds over longer stretches of road. A number of highway authorities have submitted before and after evaluation data to the Department and this suggests reductions in the rate of KSI and reductions in the percentage of vehicles exceeding the speed limit have taken place at each of the sites. It should however be noted that the data have not been independently validated or adjusted for national KSI trends or regression to mean effect. We will include this in our revised circular.

RoSPA Response

Almost two thirds of road deaths occur on rural roads, with rural single carriageway A roads in particular carrying some 38% of deaths. Crashes on these roads are more likely to be severe, and the numbers of fatal and serious accidents on rural roads has not reduced at the same rate as they have on urban roads. Rural roads must be one of the key challenges for the next road safety strategy.

RoSPA agrees that a blanket reduction of the national speed limit on all single carriageway roads from 60 mph to 50 mph is unnecessary. Many good quality single carriageway roads are suitable for a speed limit of 60 mph. However, many other single carriageway rural roads, that currently have a speed limit of 60 mph, are completely unsuitable for such high speeds. Some rural roads have a risk of death or serious injury comparable to motorways, whilst others are more than ten times as risky.

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Rural roads vary widely, from wide, modern dual carriageways to narrow, hilly and bendy single carriageway roads with frequent blind bends, brows of hills and narrow verges bordered by trees and hedges. They travel through unpopulated areas but also through towns and villages. They often carry lower levels of traffic than urban roads and frequently have higher speed limits. Some are through routes and links between towns, others are mainly local access roads. Many carry both through traffic and local traffic. They are less likely to have been treated with safety engineering schemes than urban roads.

Drivers' choice of speed is partly dependent on the characteristics of the road on which they are driving, and their perception of what is a safe speed on a particular road will often differ to that of other road users, such as pedestrians, pedal cyclists and horse riders, and will often under-estimate the actual level of risk. Due to the lower traffic flow on rural roads many people think they are safer than they actually are. But, their twisty and hilly nature reduces the distance that drivers, riders and walkers can see ahead, and higher speeds on these roads gives people less time to react and results in more severe impacts.

When publicising the speed limit changes, the likely presence of other road users needs to be highlighted to drivers. Pedestrians, cyclists and equestrians use rural roads but vehicle users often perceive vulnerable road users as a hazard of urban driving not rural. The road itself may not be self-explanatory on these points, so changes in speed limits must be widely publicised along with the methods used to decide on the limit. RoSPA has already emphasised in previous consultations the importance of involving the local residents and road users in the creation of Home Zones and Quiet Lanes and ensuring their full commitment to changes to their environment.

Average Speed Safety Cameras

RoSPA supports the use of average speed safety cameras which help to persuade drivers to maintain a safe appropriate speed over longer distances than other types of camera.

RoSPA thanks the Department for Transport for the opportunity to comment on this consultation. We have no objection to the contents of RoSPA's response being reproduced or attributed.

Road Safety Department
RoSPA
Edgbaston Park
353 Bristol Road
Birmingham B5 7ST
Tel: 0121 248 2000.