

SPEED MANAGEMENT AND SPEED LIMITS

Response by the Slower Speeds Initiative to the consultation on updating Circular Roads 1/93
March 2005

INTRODUCTION, EXECUTIVE SUMMARY AND SUMMARY OF RECOMMENDATIONS

Introduction

The Slower Speeds Initiative was founded in March 1998 by the Children's Play Council, CTC, the Environmental Transport Association, the Pedestrians' Association (now Living Streets), Pedestrian Policy Group, Road Danger Reduction Forum, RoadPeace, Sustrans and Transport 2000. We are working for evidence-based speed limits that reflect the impacts of speed and contribute to increased sustainability of our transport system. Such limits should be sustainably enforced, through appropriate vehicle design.

We are submitting this technical response to the consultation on behalf of all our founders. CTC and Transport 2000 have also submitted more general responses that accord with this one.

The Initiative has an obvious interest in commenting on this consultation, but we would like to point out four key reasons why we consider this new Circular to be of paramount importance:

- It introduces the Speed Assessment Framework, which we very much welcome as opening an era of evidence-based speed policy. We commend the Department for taking an international lead in applying an approach that has so far been largely theoretical. Our policy advisers are Stephen Plowden and Mayer Hillman, authors of *Speed Control and Transport Policy* (1996) which argued for a cost-benefit analysis approach to determine optimal speed limits for a given road type and demonstrated that, in general, speed limits should be lower than at present. Their work is acknowledged in the research that has led to this draft Circular.
- The Initiative is regularly contacted for advice by individuals and community groups who want lower and/or better enforced speed limits. We are acutely aware of their plight.
- The work of our founders, some of it funded by the Government, depends on lower and better enforced speed limits and greater institutional recognition of the impacts of speed for its success. This work encompasses safer routes to school and child independent mobility, use of the National Cycle Network, Active Travel, environmental considerations in car use, campaigns against aggressive driving and for greater awareness of the seriousness of speeding offences in charging and sentencing.
- We represent the main non-governmental organisations with a primary concern for vulnerable road users. Last year pedestrians and cyclists accounted for 46% of casualties involving death and serious injury on urban roads. They deserve at least proportionate consideration in official guidance on speed management and the determination of speed limits.

Our comment on the draft is intended to be helpful. We have tried to accompany our criticisms with explanations and recommendations on how the new Circular could be improved. This is the main reason for the length of our response. We believe that extensive revision of the draft Circular is required to eliminate ambiguity — essential if the Circular is to serve as guidance. We also believe that the scope of the Circular needs to be widened to provide transport planners and managers with the information they need to realise the full potential of speed management.

The two main themes in our comment are that speed management must ensure equitable access to the road network and that explicit guidance and information will help to reduce what we consider is wholly unjustified controversy around speed limits and their enforcement.

We urge the Government to overcome its speed phobia. More people favour speed control than oppose it. Forthright presentation and implementation of clearly reasoned policy is the best way to end spurious and mischievous controversy. Lives are at stake — as all the research commissioned by the Department over the last few years clearly shows.

Executive Summary

THE ROLE OF SPEED MANAGEMENT AND SPEED LIMITS

'Practically all significant impacts of road traffic, e.g., various cost components and safety, depend on driving speeds.' Two phases of speed management are recognised: setting speed limits for different kinds of roads and applying the measures that promote compliance. Speed limits should be primary indicators of how the road network is to be used and the desired pattern of impacts of that use.

A CHANGED CONTEXT FOR MANAGING SPEED

Understanding of the impacts of speed has increased considerably since 1993. The policy context for managing speed has also changed dramatically. Controlling traffic growth and its impacts is part of a wider environmental protection agenda. The relevance of speed management to the wider policy spectrum including sustainable development, land use, health, social inclusion, community safety and improving the public realm should be highlighted in the guidance.

THE NEED FOR A NATIONAL SPEED MANAGEMENT STRATEGY AND NEW LIMITS TO SUPPORT IT

The new context and increasingly urgent environmental priorities of reducing CO2 emissions and fossil fuel dependency argue for a national speed management strategy, with new national speed limits. The problem that the new Circular seeks to address also argues for new national speed limits. Two new limits, 20mph for settlements and 50mph for single carriageway roads, would provide the basis for a simplified, coherent and consistent approach by Traffic Authorities to developing speed management strategies and setting local speed limits. The 70mph limit for dual carriageways and motorways is also unnecessarily high if global warming, high oil prices and energy security are taken into account. If the Government will not consider reducing national limits, it could at least carry out large-scale trials of lower limits to determine optimum limits for different types of road.

THE NEED FOR GUIDANCE

Comprehensive guidance on speed management is needed to reduce conflicts between road functions and road users, to ensure that speed management supports wider policy objectives, to deal with conflicting perspectives and because the entire task has been left to Traffic Authorities.

The uses of risk, road user, driver perception and mean speed expose assumptions which are not consistent with the broader aims of speed management or the specific thrust of the Speed Assessment Framework: balancing impacts and determining optimal speed limits. Speed limit changes are treated as measures of last resort and it is assumed they will usually be considered only in response to casualties. There is far too much emphasis placed on the role of police in determining acceptable speed limits and far too little on the role of communities. These problems arise because one key concept for policy, including speed management, is missing entirely — equity.

The Objectives of the new Circular should be to provide up to date advice on research and best practice in speed management in order to promote consistency, reduce conflicts between road functions and road users and ensure local transport policy supports wider policy objectives.

The general presumption in the draft Circular against speed limit changes in the absence of a casualty problem builds in a post hoc approach to speed management which militates against the very consistency the new Circular is supposed to achieve. It discriminates against pedestrians and cyclists and underestimates how far responses to intimidation account for the absence of casualties.

PRINCIPLES

The principles from the MASTER framework are recommended as a basis for the new Circular, including the following:

- decisions concerning speed management should be transparent and based on explicitly formulated principles
- driving speeds should reflect a socially desirable balance of all impacts of speed and equitable distribution of these impacts
- the authorities involved in managing speed should have compatible ideas about general objectives, target speeds and appropriate measures to achieve compliance.

Equity, precaution and prevention, participation, transparency, accountability and environmental protection should be included in the explicitly formulated principles. A police policy on speed limits is needed to demonstrate compatibility.

CONSIDERATIONS AND PROCEDURES IN SETTING SPEED LIMITS

A clear procedure for setting speed limits in support of local speed management strategies is needed. The appropriate division of the task between national and local authorities is essential if speed limits are to be changed in a consistent and cost-effective manner. A procedure based on analysis of functions and road users would help to restore equity and ensure the consideration of relevant impacts. A system which explicitly addressed the conflicts between the settled and the mobile and between the slow and the fast would aid decision-making by indicating appropriate approaches, data collection requirements and speed management techniques.

THE SPEED ASSESSMENT FRAMEWORK

The Speed Assessment Framework is the most significant and welcome development behind the draft Circular. The Framework should be used to ensure that speed management and speed limits on roads where the traffic function is dominant increase the social, economic and environmental efficiency of network. For the sake of transparency and equity, the Framework should be developed to ensure full consideration of qualitative impacts, analysis of the distribution of impacts, sensitivity tests and taking a range of viewpoints into account when determining acceptability.

The methodology for assigning roads to tiers should include explicit steps to indicate when and how to take into account additional criteria. A route for identifying Quiet Lanes should be included. The current road classification system should not be imposed on the tier system.

COSTS AND BENEFITS

Trials are needed to establish how journey times for motorised traffic might change with lower speed limits. The cost and negative visual impact of signing would be reduced by a change in the regulations. The ratio of benefits to costs justifies a major expansion in funding for speed management measures, which could underpin an area wide approach in settlements and a network wide approach on rural roads.

DATA COLLECTION

The new Circular should provide guidance to Traffic Authorities on the appropriate data for evaluating the current state of their networks, carrying out initial assessments of costs and benefits and monitoring the impacts of changes in speed limits. Traffic Authorities should have a duty to monitor speeds across the networks they manage.

TRAFFIC CALMING MEASURES, INNOVATION AND REGULATIONS

The new Circular should provide explicit guidance on not endangering cyclists when traffic calming measures are introduced. There should be some discussion of recent innovations in traffic calming and the new Circular should incorporate guidance on relaxation of regulations to encourage innovation. There should also be guidance on dealing with liability.

SUMMARY OF RECOMMENDATIONS

A CHANGED CONTEXT FOR MANAGING SPEED

The new Circular should be a replacement of Circular Roads 1/93 not an update. It should provide more guidance on speed management and the title should reflect its wider scope.

The research background for speed management should be more fully described and referenced.

The wider impacts of speed should be more fully described.

The policy context for speed management should be more fully described.

There should be guidance on using speed management to meet national and local policy objectives, especially Department for Transport Objective III Public Service Agreements and Local Transport Plan shared priorities.

THE NEED FOR A NATIONAL SPEED MANAGEMENT STRATEGY AND NEW LIMITS

There should be a national speed management strategy with new national limits to provide the basis for the development of local speed management strategies and speed limits.

20mph should be the default limit for the majority of roads in settlements.

50mph should be the default limit for single carriageway roads.

The 70mph limit should be reviewed for environmental reasons.

In the absence of legislation for new default limits of 20mph and 50mph, the Department should undertake large-scale trials of lower limits on urban and rural road networks. The effects of lower limits on dual carriageways and motorways should also be investigated.

THE NEED FOR GUIDANCE

The Circular should provide much clearer and more explicit guidance. Speed management strategies should support wider traffic management and policy objectives. Traffic Authorities should ensure that speed management is linked with other strategic plans.

The use of key concepts — risk, road user, driver perception and mean speed — needs to be reviewed to avoid bias and inconsistency.

The Circular should put equity at the centre of considerations for speed management.

Communities should be given a role in determining appropriate speed limits.

The Circular must avoid the presumption that vulnerable road users will be absent from most of the road network by providing much clearer guidance on how to take them into account.

Driver speed choice and mean speeds should not be the overriding determinants of appropriate speed. The Circular must provide guidance on how to give other factors appropriate weight. The criteria that speed limits need to meet to ensure the rights of vulnerable road users, and how they are to be met should be set out in principle but also reflected in speed limit setting procedure and methodologies to supplement the application of the speed assessment framework.

The police should not be given the final say on appropriate speed limits.

The costs of enforcement should not determine speed management effort. Rather, the objectives of speed management should determine priorities for ensuring cost-effective compliance.

The Objectives of the Circular should be somewhat broader, more explicit and should be reflected in the final Circular.

The Circular should not be based on the presumption that changes to speed limits are measures of last resort. It should provide guidance on how appropriate speed limits contribute to speed management strategies that support the wider policy context.

The draft Circular should help Traffic Authorities take all road users into account, accurately assess current conditions on local road networks, evaluate the scale of the problems these conditions pose for preventing casualties, addressing injustice and meeting wider policy objectives, and set out the initial steps which will begin to redress these problems.

Traffic Authorities should have targeted programmes for completing speed limit reviews and introducing new speed limits across the networks they manage.

The Department should issue guidance on appropriate returns on road safety investment, where there are existing methodologies to evaluate costs and benefits, to encourage greater investment and faster progress.

PRINCIPLES

The Circular needs explicitly formulated principles which should include equity, precaution and prevention, participation, transparency, accountability and environmental protection. The MASTER speed assessment framework principles are recommended.

The Department and the Home Office should work with the Association of Chief Police Officers to produce an explicit and publicly available police policy on speed limits both to demonstrate compatibility with speed management principles and ensure transparency. The police policy should be issued alongside the new Circular.

CONSIDERATIONS AND PROCEDURES IN SETTING SPEED LIMITS

The new Circular should provide more detailed advice on procedure for applying appropriate local limits, data collection, when to use the speed assessment framework and how to adapt it to local circumstances. A procedure based on analysis of functions and road users would help to restore equity and ensure the consideration of relevant impacts. We recommend a system which distinguishes between social and traffic functions.

THE SPEED ASSESSMENT FRAMEWORK

The Speed Assessment Framework should be introduced in the section on principles.

The Framework should be used to ensure that speed management and speed limits on roads where the traffic function is dominant increase the social, economic and environmental efficiency of network.

The Framework should be extended to dual carriageways and motorways to demonstrate whether or not the 70mph limit is optimal.

The Framework should include fuller consideration of qualitative impacts, analysis of the distribution of impacts, sensitivity tests and take a range of viewpoints into account when determining acceptability.

Ways of assessing traffic intimidation and the impacts of traffic on immediate environmental quality are needed. Fuller guidance on criteria and alternative assessment methodologies should be provided. This should be clearly incorporated into the Framework or explicitly linked to it.

There should be a way of demonstrating that Local Transport Plans and other local strategic plans have been taken into account in applying the Framework, as in wider speed management.

The distribution of impacts as well as their magnitude should be taken into account in the Framework.

The spreadsheet should allow for sensitivity testing.

The criteria for determining whether the speeds are acceptable and social objectives have been met when applying the framework should be clearly indicated. The weight given to the differing viewpoints in determining acceptability should be transparent in the use of the Framework.

The extent to which acceptability is dependent on understanding and communication should be brought out in guidance to Traffic Authorities. The mismatch between what is popular and what is appropriate should be addressed in the new Circular. The Framework should enable Traffic Authorities to demonstrate that potentially unpopular decisions are well-founded.

The methodology for assigning roads to tiers should include explicit steps to indicate when and how to take into account additional criteria (i.e., qualitative factors such as the needs vulnerable road users, or the sensitivity of the surrounding landscape) when determining 'tier load'.

The flow chart and selection procedure should provide a route for identifying roads that should be considered for Quiet Lane designation.

The use of the tier system should not be confused by imposing the road classes.

COSTS AND BENEFITS

Discussion of costs and benefits in the new Circular (para 27) should be more clearly related to the Framework and its philosophy that an optimum can be determined. It should include the monetised, quantified and qualitative impacts and their distribution.

Trials are needed to establish how journey times for motorised traffic might change with lower speed limits.

The Department should issue guidance on appropriate returns on road safety investment.

DATA COLLECTION

The new Circular should provide guidance to Traffic Authorities on the appropriate data for evaluating the current state of their networks, carrying out initial assessments of costs and benefits and monitoring the impacts of changes in speed limits.

Traffic Authorities should have a duty to monitor speeds across the networks they manage.

TRAFFIC CALMING MEASURES, INNOVATION AND REGULATIONS

The new Circular should provide explicit guidance on not endangering cyclists when traffic calming measures are introduced.

The discussion of traffic calming measures, home zones and quiet lanes should cover innovations such as 'shared space'.

There should also be explicit guidance on procedures — including relaxation of regulations — for introducing innovative measures.

Guidance on dealing with liability should also be provided.