

20mph Project North Phase - Consultation Response Letter from Police



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Environment and Planning
Policy and Projects Division
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Date: 29 May 2013

Our Ref:

Your Ref: 040-016

Consultation Questionnaire
Proposed Cambridge City Wide 20mph Speed Limit North Phase

Dear Ben,

Thank you for your consultation questionnaire concerning the above. Unfortunately a simple yes / no / no opinion, answer will not adequately represent the views of Police.

The Department for Transport recently published guidance (DfT Circular 1/2013 Setting local speed limits).

Highlights from that document include:-

Speed limits should be evidence led and self explaining.
They should encourage self compliance.
The guidance is to be used for setting all local speed limits.
Speed limits are only one element of speed management.
Local speed limits should not be set in isolation.
They should be part of a package with other speed management measures including engineering.
If it is set unrealistically low It may be ineffective....
The full range of speed management measures should always be considered before a new speed limit is introduced.
Mean speeds should be used as the basis for determining local speed limits.

In response to:-

Question 1,

This question assumes compliance and relevant guidance on how best this can be achieved is provided in the current DfT guidance. Whilst in principle Police support the introduction of

20 mph speed restrictions where the combination of environment and engineering measures deliver an acceptable level of compliance, we have some concerns that signs and road markings alone may not be effective at all locations. This risks demand for a level of Police speed enforcement activity, sufficient to achieve compliance, that is not practical to achieve. DfT Guidance states:- "... General compliance needs to be achievable without an excessive reliance on enforcement". "... there should be no expectation on the Police to provide additional enforcement beyond their routine activity, unless this has been explicitly agreed".

Question 2,

Police support the introduction of a 20 mph speed restriction at locations where evidence is available to demonstrate the suitability of a site, in line with current DfT guidance. Which in part suggests:- "... Where means speeds are already at or below 24 mph."

The appearance of a road is an important factor particularly where the effectiveness of a 20 mph speed restriction is reliant on signs and road markings alone, for example at Maids Causeway, Cambridge, where mean speeds within an existing (signs and road markings) 20 mph speed restriction area have recently been recorded at up to 28 mph with non compliance and offending rates of 41.3%.

Police note DfT guidance mentions Portsmouth, where average speeds of 25 mph or higher were present before the introduction of a 20 mph speed restriction and the subsequent reduction in speed once the new lower restrictions were introduced were insufficient to make speeds generally compliant. Bearing this in mind, the results of your traffic surveys and our surveys at fewer sites, would suggest the introduction of a 20 mph speed restriction, by signs and road markings alone may not be effective at some locations coloured blue on the plan.(i.e. those were mean speeds above 24 mph have been recorded)

Question 3,

The roads marked with a red and white coloured dotted line on the consultation plan vary in their appearance, with some benefitting from traffic calming measures. Some of the roads currently being considered for inclusion within this project, i.e. Kings Hedges Road, Arbury Road, Gilbert Road have a very similar appearance to some of the "A" and "B" class roads that form part of the highway network in this part of the city but have been excluded from the project on the basis that "these roads are not currently suited to 20 mph". Other than being the responsibility of Cambridgeshire County Council, if the "A" and "B" class roads are not suited to a 20 mph speed restriction then what justification is there to introduce a 20 mph speed restriction on roads which are similar in appearance and upon which speeds of up to 93 mph (Gilbert Road) have recently been recorded as part of our joint traffic survey work?

Where mean speeds above 24 mph were recorded, then in the absence of engineering measures to improve compliance, Police question the introduction of a 20 mph speed restriction at Arbury Road, Gilbert Road or Kings Hedges Road which are likely to require significant levels of Police speed enforcement to achieve compliance.

Clearly if and until this project is implemented its success will be difficult to precisely predict. Whilst there are benefits allied to the introduction of a 20 mph speed restriction Police have concerns about the level of speed enforcement that may be necessary to achieve compliance.

If following the consultation process the scheme proceeds to the implementation stage, please can consideration be given to the use of an experimental Traffic Regulation Order? This would allow the scheme to be implemented and for its effectiveness to be monitored for up to 18 months before a final decision is made on whether to make the Traffic Regulation Order permanent or not, as well as what if any additional engineering measures may be required to help deliver a successful scheme.

Finally, excess speed will generally be a feature on most roads. Using data obtained from our recent comparative surveys at a limited number of roads within Cambridge the results suggest that if a 20 mph speed restriction without additional measures is introduced, some locations are likely to experience a level of offending that would be a serious concern and likely to remain so regardless of Police speed enforcement.

Yours Sincerely

S.K.Chessum

pp. Chief Inspector Richard Hann

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