

# Revision of the Speed Limit Circular – Summary of Consultation Responses

Department for Transport  
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# 1. Introduction

1. In July 2012 the Department for Transport launched a consultation on a number of proposals to revise the Speed Limit Circular, which provides local authorities with up-to-date and consistent advice on setting local speed limits. The aim of the consultation was to seek comments on a revision of the current guidance to take account of recent changes to the signing regime, to expand the section on 20mph zones and limits, to introduce the Speed Limit Appraisal Tool and to make some other changes. The consultation closed on 5 October 2012.
2. The Speed Limit Circular consultation asked questions about the following issues:
  - Traffic signs
  - 20mph zones and limits
  - Introducing the new Speed Limit Appraisal Tool and withdrawing the recommendation to use the technical assessment tool for rural speed limit reviews
  - Speed limits for air quality purposes
  - Other changes
3. This document summarises the responses received for each consultation question and provides a short summary of key issues raised by respondents.
4. We would like to thank all consultees for their responses. All responses were carefully considered.
5. This summary is of the responses that were received at the time of the consultation. The questions have been taken directly from the consultation document and do not reflect current policy.

## **Overview of Responses**

6. We received a total of 428 responses to the consultation by the closing date. Of these, 250 responses came from members of the public, and the remainder from organisations including the Welsh Government,

local authorities, the Police, the Magistrates Association, Transport for London and other organisations with an interest in any of the issues raised in the consultation. Not all individuals and organisations provided answers or comments on all 5 questions asked. A list of the organisations who responded is at the end of this document.

7. The responses were broken down as follows:

<b>Individual</b>	<b>250</b>
<b>Government Groups</b>	
<b>Local Authority</b>	<b>83</b>
<b>Police</b>	<b>4</b>
<b>Government</b>	<b>3</b>
<b>Courts</b>	<b>1</b>
<b>Other Groups</b>	
<b>Road Safety Interest Groups</b>	<b>24</b>
<b>Environmental Interest Groups</b>	<b>6</b>
<b>Business Interest</b>	<b>41</b>
<b>Other Interest</b>	<b>16</b>
<b>Total</b>	<b>428</b>

8. Where responses did not correspond directly to the questions posed, but took a more general approach, these comments have been considered under the most appropriate questions or were taken into consideration separately. The report does not attempt to summarise all the comments made by respondents. However, all comments were considered whether or not they are referred to in this report.

## 2. Question 1

9. Question 1 of the consultation asked if the consultees agreed that the advice about introducing 20mph zones and limits provided useful guidance to traffic authorities considering speed management in urban areas and if not that they explain their reasons. The following paragraphs summarise the responses as well as some of the issues and concerns brought up in the responses.

### **Responses from Government groups**

10. Of the 91 responses from Government groups, 71% agreed that the advice about introducing 20mph zones and limits provides useful guidance to traffic authorities considering speed management in urban areas. 72% of local authorities, 50% of Police and all of the Government departments, including the Welsh Government, agreed.
11. Only 14% of Government groups disagreed, including the Magistrates Association, North Yorkshire Police and various local authorities.
12. 14% of Government group respondents did not answer the question posed.

### **Responses from other groups**

13. Of the 87 responses from other groups, 61% agreed that the advice would be useful to traffic authorities.
14. 24% of the other groups disagreed.
15. 15% of the other Groups respondents did not answer the question.

### **Responses from individual stakeholders**

15. Of the 250 responses from individual stakeholders, 44% agreed with the advice being useful guidance to traffic authorities, with 40% disagreeing and 16% not answering the question posed.

## **Comments and issues raised by respondents**

- 16.** ADEPT (formerly the County Surveyors' Society) commented that the revised circular would prove useful to traffic officers when considering whether a 20mph zone or a 20mph speed limit were appropriate, depending on the circumstances, and that it clearly shows the differences between the two types of scheme.
- 17.** The Welsh Government added that the cross reference to walking and cycling, improving the quality of life and healthier lifestyles links well with the Active Travel (Wales) Bill.
- 18.** The Association of Chief Police officers (ACPO) commented that they support road safety measures that influence drivers into slower speeds, especially in predominantly residential areas, but that in each case there must be a proven need for a 20mph zone or limit, the limit must be clear and the motorist must have the ability to comply. They consider that zones and limits have to be self-enforcing with the implementation of engineering measures which physically ensure driver compliance. ACPO also believes that the roads authority must be responsible for ensuring that it meets these aims. They do not support large-scale 20mph limits over a number of roads.
- 19.** The Magistrates Association tend to favour 20mph zones, with traffic calming measures to make traffic effectively self-limiting in terms of speed. They would like to see advice favouring zones over limits, except in areas where existing features such as narrow roads and parked cars already form a type of traffic calming.
- 20.** The advice in section 6 (paragraph 72) on where traffic authorities can, over time, introduce 20mph zones or limits (first stated in the Strategic Framework for Road Safety, DfT May 2011) attracted much comment. Transport for London (TfL) and the Chartered Institution of Highways and Transportation (CIHT) noted the ambiguity in the phrase 'slowing down road traffic' which in the context was intended as a negative impact increasing journey time, to be weighed against the positive impact of easing business on foot. The RAC Foundation agreed that while in certain circumstances it will be beneficial to reduce speeds on major routes, the statement should also include reference to the importance of maintaining 'streets for movement' in urban areas and that the wider economic impacts of any speed reduction on major routes is fully considered. The Campaign to Protect Rural England (CPRE) suggests the use of a clearer road hierarchy: roads with a local access function (streets in urban areas); roads with primarily a movement function (roads in urban areas) and higher quality roads. They note that Manual for Streets defines streets and roads differently and suggest that streets, which have a range of functions, should be 20mph, while on roads 20mph would not normally be appropriate. Another respondent commented that 20mphs should not be restricted to streets where there were already high numbers of walkers and

cyclists, but more readily to allow the use of 20mph limits with the specific objective of encouraging more pedestrians and cyclists by means of a modal shift.

**21.** Some consultees considered that some parts of the circular needed to be clearer. Issues highlighted included:

- If a 20 mph speed limit is implemented on a road with mean speeds of 24mph, then the research presented in paragraph 84 implies a reduction of 1mph. This is inconsistent with the ultimate aim of speed management, to ensure that all vehicles are moving at speeds below or close as possible to the posted speed limit.
- Given the now apparent similarities between a 20mph speed limit and zone, it was suggested that we consider removing the two different definitions. Perhaps all 20mph speed limits should be zones (or vice versa), the signage should be standardised, and physical traffic calming measures should be applied where mean speeds are above a certain threshold.

**22.** Where individual stakeholders disagreed that this was useful guidance, some commented that it would encourage local authorities to review all streets and roads, which would take resources greater than should be applied to this issue; that the proliferation of local limits would slow vehicles to an unnecessarily slow speed, angering drivers and encouraging them to break the limit where policing is not evident or available; that enforcement would require additional resources; and that this would encourage local authorities to interfere again when this government was in favour of light touch legislation.

**23.** Brake recommended removing, integrating or significantly overhauling the key points boxes which conflicted with the main body of the guidance. For example, in section one, the key points box did not mention the guidance in point 12, which asks local authorities to consider introducing more 20mph limits in urban areas. It even, arguably, undermines this point by implying that lower limits should only be considered where there are particular needs and conditions to warrant special attention, and that they should be based on drivers' assessments of a safe speed to travel.

## Government response.

**24.** Enforcement is a matter for the police and the Circular emphasises that authorities must work with the police when determining changes to

limits. Paragraph 73 says that successful 20 mph zones and 20 mph speed limits are generally self-enforcing, i.e. the existing conditions of the road together with measures such as traffic calming or signing, publicity and information as part of the scheme, lead to a mean traffic speed compliant with the speed limit. To achieve compliance there should be no expectation on the police to provide additional enforcement beyond their routine activity, unless this has been explicitly agreed. Paragraph 19 says:

*Unless a speed limit is set with support from the local community, the police and other local services; with supporting education; and with consideration of whether engineering measures are necessary to reduce speeds; or if it is set unrealistically low for the particular road function and condition, it may be ineffective and drivers may not comply with the speed limit.*

*If many drivers continued to travel at unacceptable speeds, the risk of collisions and injuries would increase and significant and avoidable enforcement activity would be needed.*

#### Advice on where 20mph could be considered

**25.** In the light of comments on the wording of the advice on where 20mph could be considered it will be changed to

*Local authorities are able to use their power to introduce 20mph speed limits or zones on:*

*Major streets where there are – or could be - significant numbers of journeys on foot, and/or where pedal cycle movements are an important consideration, and this outweighs the disadvantage of longer journey times for motorised traffic.*

*This is in addition to*

*Residential streets in cities, towns and villages, particularly where the streets are being used by people on foot and on bicycles, there is community support and the characteristics of the street are suitable.*

**26.** The wording needs to manage public expectations about what a speed limit can achieve, to avoid local authorities being bombarded with demands they cannot meet. We hope that the new speed limit appraisal tool will support authorities in assessing the full costs and benefits of any proposed schemes and make robust, evidence-based decisions about which limits they put in place. The circular emphasises that to achieve compliance there should be no expectation on the police to provide additional enforcement unless it has been explicitly agreed; that if a limit is seen to be unrealistically low for the particular road function and condition, it is unlikely to be complied with; and that if many drivers continued to travel at unacceptable speeds the risk of collisions and injuries could increase.

- 27.** We recognise that reducing speeds down to a 20mph limit can be tricky: for example, a reduction of 1mph on a mean speed of 24mph will not itself achieve the aim of bringing speeds down below a 20 mph limit. However, a reduction in actual speeds is likely to improve safety for all road users.
- 28.** We have noted the comments about the similarity between 20mph limits and 20mph zones and the suggestion that they should be combined. They are, however, different treatments: the designation of a zone tells drivers that there will be physical traffic calming measures whereas a limit does not. It is for local decision which sort of treatment is used.
- 29.** Circular 1/2006 asked traffic authorities to review the speed limits on all of their A and B roads, and implement any necessary changes, by 2011. There is no intention in this revised circular to ask for a similar full review though traffic authorities are asked to keep their speed limits under review with changing circumstances and consider the introduction of more 20mph limits and zones, over time, to ensure greater safety for people walking and cycling, using the criteria in section 6.
- 30.** A few smaller typing errors were identified and will be corrected.

### 3. Question 2

**31.** Question 2 of the consultation asked if the consultees agreed that traffic authorities should be able to consider the implementation of 20mph limits over a number of roads where mean speeds at or below 24mph are already achieved and if not, that they explain their reasons. The following paragraphs summarise the responses as well as some of the issues and concerns brought up in the responses.

#### **Responses from Government groups**

**32.** Of the 91 responses from Government groups, 72% agreed that traffic authorities should be able to consider the implementation of 20mph limits over a number of roads where mean speeds at or below 24mph are already achieved. 88% of local authorities that answered the question and all of Police, the Magistrates Association and Government departments, including the Welsh Government, who answered this question, agreed.

**33.** 9% of Government groups – all of whom were local authorities - disagreed.

**34.** 19% of Government group respondents did not answer the question posed.

#### **Responses from other groups**

**35.** Of the 87 responses from other groups, 54% agreed that traffic authorities should be able to consider the implementation of 20mph limits over a number of roads where mean speeds at or below 24mph are already achieved.

**36.** 29% of the other groups disagreed.

**37.** 17% of the other groups did not answer the question.

### **Responses from individual stakeholders**

**38.** Of the 250 responses from individual stakeholders, 44% agreed that traffic authorities should be able to consider the implementation of 20mph limits over a number of roads where mean speeds at or below 24mph are already achieved, with 41% disagreeing and 15% not answering the question posed.

### **Comments and issues raised by respondents**

**39.** TfL recommended that the guidance is updated to include reference to implementing a 20mph limit or zone using suitable measures where the mean speed is above 24mph. TfL also encourages DfT to undertake further research and evidence-gathering to better understand the impacts of the implementation of widespread 20 mph limits so that clear guidance can be issued. Additionally, TfL would like to (in special circumstances), see a relaxing of the current guidance so that 20 mph can be enforced by the Police and an appropriate National Driver Offender Re-Training scheme or speed awareness course provided as alternative means of disposal, similar to that used when enforcing other speed limits. A Speed Awareness Course should only be offered to a driver who meets the individual force's cut-off level within the national band and who has not previously attended a course within the last 3 years.

**40.** The Welsh Government agreed that traffic authorities should be able to consider the implementation of 20mph limits over a number of roads where mean speeds at or below 24mph are achieved, but they are concerned that this may put undue pressure and demand on traffic authorities. The introduction of 20mph speed limits over a wider area may also devalue the impact at specific locations such as schools. However they agree that, where appropriate, a 20mph limit should be considered as one option available to improve road safety.

**41.** ADEPT's experiences of reviewing speed limits on 'A' and 'B' roads have shown that, where mean speeds are used to set the level of speed limit, it is often the case that local constabularies would prefer the introduction of some form of engineering measures to aid compliance with the lower speed limit. In certain circumstances it is still the case that the 85th percentile speed provides a more meaningful estimate of what level a speed limit should be set at, particularly when trying to assess the level of self-enforcement without the need for supporting engineering measures. If it is the case that the mean speed is in the region of 24mph it is likely that the 85th percentile would be somewhere around 27mph to 28mph, which would make self-

enforcement, without supporting engineering measures (in addition to the required 20mph speed limit signs) more challenging. Bearing this in mind, if engineering measures are required, a 20mph zone should be introduced, rather than a 20mph speed limit which includes a number of streets.

**42.** Notwithstanding the above, there is no reason why traffic authorities should be prevented from considering the introduction of 20mph limits where mean speeds are at or below 24mph.

**43.** ACPO believes that the DfT's use of mean speeds as an indicator of general compliance is open to many skewing factors and risks unrealistic limits being set. The 85th percentile –speed at which 85 % of the total traffic flow is not exceeding is a better indication of general speeds and is preferred. Typically, the difference between mean speed and 85th percentile speed is 5 to 6 mph.

**44.** A number of the responses again argued that speed limits should be set using the 85th percentile rather than mean speeds. For example:

- We would prefer that this was based on the 85<sup>th</sup> percentile instead of the mean, as we view this measurement as giving a truer representation of compliance/self enforcement in this instance.
- If the mean speed is 24 mph, then the 85th percentile could be significantly higher. The Police use the 85th percentile threshold of 10%+2mph in their enforcement strategy. Therefore, the Police would not necessarily view that a reduction in (mean) speed limit to 20 mph would achieve “compliance with the new speed limit” given the 85th percentile could be much higher.

**45.** A number of respondents also commented that if mean speeds are already 24mph there is little point reducing a speed limit to 20mph. For example:

- Whilst it is agreed that traffic authorities should be able to consider the implementation of 20 mph limits over a number of roads, if mean speeds are already 24 mph, there would seem little point in imposing such a limit under those conditions. To do so would only increase roadside clutter with little effect bearing in mind that ACPO guidelines still are that such limits should be self-enforcing and not routinely enforced.
- Mean speeds are meaningless. A mean speed of 24mph probably indicates that most drivers accept 30mph. The number of very slow vehicles affects the mean but is irrelevant.
- Where mean speeds of 24mph are present the street is likely to have sufficient self-explaining characteristics and the further reduction of speeds to 20mph will have little or no casualty reduction benefit. The addition of signing in this context could

- reduce the effectiveness of the 20mph measures in other more vulnerable streets.
- This approach would reduce proliferation of signing and reduce overall maintenance costs.

## **Government response.**

- 46.** A Call for Evidence was issued in the spring of 2012 to enable the Department to better understand the state of the existing evidence base on the impacts of speed limit changes, particularly in terms of changes in actual speeds, but also encompassing wider impacts such as traffic diversion/suppression, accidents, emissions, noise, journey time reliability, mode shift, severance and quality of life. The information received was used in the development of the Speed Limit Appraisal Tool which is intended to help local authorities assess the full costs and benefits and make robustly defensible decisions about local speeds, and the Department is keen to continue to receive local results where 20mphs have been put in over a number of roads, to better understand the implications.
- 47.** We have noted the comments on using the 85th percentile speed – ie the speed at or below which 85% of the motor traffic is travelling - rather than mean speeds as the main speed consideration in the setting of local speed limits. The effect of using mean speeds is to enable traffic authorities to justify more and lower local speed limits where communities want them; the change from 85th percentile to mean speeds was made at the time that Circular 01/2006 was issued to increase the flexibility for local authorities in setting limits and the decision has been taken to retain that advice.
- 48.** The National Driver Offender Re-Training Scheme speed awareness courses are police schemes and any extension to cover violations of 20mph limits is a matter for the police.

## 4. Question 3

- 49.** Question 3 of the consultation asked the consultees whether they agreed that the recommendation to use the technical assessment tool should be withdrawn and if not, to explain their reasons. The technical assessment tool is to be replaced by the speed limit appraisal tool, under development while this consultation was ongoing so not part of the consultation. It was the subject of a separate Call for Evidence, published on the Department's website, earlier in 2012.
- 50.** The following paragraphs summarise the responses as well as some of the issues and concerns brought up in the responses.

### **Responses from Government groups**

- 51.** Of the 91 responses from Government groups, 69% agreed that the recommendation to use the technical assessment tool should be withdrawn. 89% of local authorities, 50% of Police and all of the Government departments, including the Welsh Government, of those who answered the question posed, agreed.
- 52.** Only 9% of Government groups - various local authorities and a Police Force - disagreed.
- 53.** 22% of Government group respondents did not answer the question posed.

### **Responses from other groups**

- 54.** Of the 87 responses from the other groups, 55% agreed that the recommendation to use the technical assessment tool should be withdrawn.

55. 21% of other groups disagreed.

56. 24% of other Groups did not answer the question.

### **Responses from individual stakeholders**

57. Of the 250 responses from individual stakeholders, 55% agreed that the recommendation to use the technical assessment tool should be withdrawn, with 30% disagreeing and 15% not answering the question posed.

### **Comments and issues raised by respondents**

58. The Welsh Government stated that following a trial of the Transport Research Laboratory (TRL) Technical Assessment tool (included in the current guidance in England) on some trunk roads in Wales, it was decided that highway authorities should be discouraged from using this extensively. Hence Welsh Assembly Government Circular 24/2009 strongly suggests that this should be used only in “borderline cases where the choice of speed limit is not clear”. They would like the web link to this TRL framework to be retained since withdrawal would negate a section within the Welsh Assembly Government document.

59. The removal of the TRL Technical Assessment Tool from the circular removes the link to accident rates, which will ensure that Highway Authorities consider the types of collisions rather than just the number when recommending any engineering measures or changes to speed limits.

60. TfL agreed that the recommendation to use the technical assessment tool should be withdrawn, but only once the Speed Limit Appraisal Tool is ‘live’, hence publication of the revised Circular and the Speed Limit Appraisal Tool should be concurrent.

61. CPRE commented that the existing tool was too complicated so had not been used much. However, they had similar concerns about the new Appraisal tool; the Department was aware of these concerns through CPRE’s involvement in the steering group set up to manage its development. CPRE considered that the new tool should be peer-reviewed and that the circular should make it clear that it is not a requirement for local authorities to use it.

62. Other comments included:

- Given that the technical assessment tool will be superseded by the new Speed Limit Appraisal Tool, RoSPA agrees that the recommendation to use the technical assessment tool should be withdrawn, once the Speed Limit Appraisal Tool is available.

However, the advice in the new circular should still recommend evaluation and monitoring of new schemes, for example, by the use of the Speed Limit Appraisal Tool.

- I have not used the technical assessment tool. It really depends on how the assessment tool is set up as to whether this will work well. But the guidance must be robust to start with and based on sound research and best practice. At the moment that can not be said.

The idea must be to make each and every speed limit work, if this document guidelines are followed. I do not think that that will happen.

It would be good if the technical assessment tool was largely prescriptive and effective.

- Clearly it is sensible to withdraw a technical assessment tool if a new appraisal tool is introduced. We are concerned however that the replacement Speed Limit Appraisal tool is an unknown and unproven document, which is still under development. Local highway authorities should have the opportunity to see how the replacement operates, and to assess whether it constitutes an adequate replacement, before removing the existing tool from use. In terms of interpreting and applying the existing national guidance, this has been one of the few means by which to achieve some level of objective consistency, and will have formed the basis of many of the speed limit reviews conducted nationwide on 'A' and 'B' class roads since 1/06 was published. There is likely to be an issue of consistency, relative to all these recently conducted reviews, when the new appraisal tool comes into use.

If the new appraisal tool is too complex and onerous, it is unlikely, given the current levels of resources available and other priorities, the tool will prove of practical use.

- The current technical assessment tool provides a useful aid. The additional costs of a more detailed assessment would make it likely that fewer changes to speed limits would be assessed than under the current Speed Management Strategy in Norfolk.
- Brake is concerned that it is extremely difficult to assess this guidance without having had the opportunity to review and consider the assessment tool referred to throughout and without understanding of the criteria it will use. Brake would urge the DfT to give key experts and stakeholders such as Brake opportunity to consult on this tool before it is finalised.

## Government response

**63.** Traffic authorities are invited, but not required, to use the new Tool which is intended to help them assess the full costs and benefits and make robustly defensible decisions about local speeds. It was developed in consultation with a steering group on which Government, local authorities, CIHT and CPRE were represented and they were given the opportunity to test the tool during development. It is being launched at the time that the revised Circular is issued, and while the previous advice to use the speed assessment framework, whose spreadsheet evaluated the possible consequences of changing the speed limit on a rural single carriageway road or network, is being withdrawn, the spreadsheet itself is still available on [www.TRL.co.uk](http://www.TRL.co.uk).

## 5. Question 4

**64.** Question 4 of the consultation asked consultees whether they agreed that compliance with air quality limits could be a factor in the choice of speed made by local traffic authorities and if not, to explain their reasons. The following paragraphs summarise the responses as well as some of the issues and concerns brought up in the responses.

### **Responses from Government groups**

**65.** Of the 91 responses from Government groups, 63% agreed that compliance with air quality limits could be a factor in the choice of speed made by local traffic authorities. 77% of local authorities, 50% of Police and all of the Government departments, including the Welsh Government, of those who answered the question posed, agreed.

**66.** Only 20% of Government groups disagreed, who comprised of various local authorities and a Police Force.

**67.** 17% of Government group respondents did not answer the question posed.

### **Responses from other groups**

**68.** Of the 87 responses from the other groups, 60% agreed that compliance with air quality limits could be a factor in the choice of speed made by local traffic authorities.

69. 22% of the other groups disagreed and 18% of the other groups did not answer the question.

### **Responses from individual stakeholders**

70. Of the 250 responses from individual stakeholders, 48% agreed that compliance with air quality limits could be a factor in the choice of speed made by local traffic authorities, with 37% disagreeing and 15% not answering the question posed.

### **Comments and issues raised by respondents**

71. ADEPT believe that air quality will mostly be a factor to be taken into consideration when setting speed limits in heavily urbanised environments. Air quality has a significant impact on a variety of users, such as pedestrians and cyclists, and is certainly a valid consideration. It is not, though, the only environmental issue to be taken into account, with traffic noise in particular being relevant.

72. TfL commented that the impact of speed limits, and consequently vehicle speeds, on air quality is complex. Not only is the air quality metric under consideration relevant (PM, NO<sub>x</sub>, CO<sub>2</sub> etc), with speed changes affecting different metrics in different ways, but many other factors are also relevant including congestion levels, whether speeds are moving towards or away from emission minima in vehicle engine cycles and the potential of speed limit changes to deliver modal shift. Additionally, future changes in vehicle engine design, vehicle fleet make up (e.g. diesel versus petrol proportions of the fleet) and emission reduction targets will impact the decision making process should air quality compliance be a driving factor in speed limit decisions.

73. Given this complex landscape, TfL encourages DfT to demonstrate evidence on the impact of changes to speed limits in different scenarios in order to ensure that the guidance facilitates improvements to air quality and not the reverse.

74. The Welsh Government agreed that a balance is required between road safety and air quality.

75. Other comments included:

- Yes it could be a factor, but there will need to be safeguards to ensure that such limits are properly engineered so that they are easily understood by road users in order to generate appropriate levels of compliance. Therefore, when such limits are implemented they will need to comply with the normal implementation criteria to ensure mean speeds match the relevant speed limit; this may mean physical engineering measures may be required. Air quality limits should not be the

sole deciding factor in the setting of a speed limit, other gravity factors of a road safety nature should also be present to ensure a consistent application nationally.

- There is a concern over the introduction of speed limits which could be meaningless to drivers, and distract from the self-explaining character of a road.
- Loosely agree. However, this needs to be carefully weighted to ensure that the geometry and function of a road, coupled with the safety of all road users, is the overriding factor in determining an appropriate speed limit. Poor air quality on a particular road may not be a direct consequence of traffic on that road (e.g. from an adjacent motorway) so a reduction in the speed limit may have no overall impact.
- Compliance with air quality limits could be a factor in the choice of speed limits since slowing traffic down too much may lead to deterioration in air quality but this is likely to be a rarely used factor to consider.
- We would like to see an evidence based approach to assessing factors for consideration in the setting of speed limits. While we support the possible consideration of air quality impacts, we would like to see a robust analysis of the relationship between speeds and emissions, particularly relating to the implementation of speed controls in urban traffic settings.
- Although agreed in principle, there are reservations regarding the monitoring of air quality within an urban environment. This function is presently carried out by the District Councils. Cumbria County Council, as Highway Authority, does not have the equipment or expertise to do this. Assurance is sought that this function would not become the responsibility of the Highway Authority.

## **Government Response**

**76.** We recognise that the issue of air quality limits is very complex and that imposing a speed limit is not necessarily the answer; we also recognise that the visible characteristics of a road affect the speeds that drivers choose and that to be effective the reasons for a limit need to be understood. This provision may seldom be used but it is important that authorities are able to take air quality into account when they need to. We will amend the wording of the circular to reflect this.

**77.** There is no intention to transfer the responsibility of monitoring of air quality in urban areas from the District Council to the Highway Authority.

## **6. Question 5**

- 78.** Question 5 of the consultation asked consultees for any other comments on issues which were not included in the consultation questions. The following paragraphs identify some of the issues and concerns brought up in the responses.
- 79.** ADEPT would wish to highlight that resources available to local highway authorities are limited, and comprehensive reviews using the Tool are unlikely. Traffic authorities will need to consider other influences in setting limits, not least the need to support local economies through the movement of people and goods. DfT is asked to note that local elections in May 2013 will be an influence on the ability of traffic authorities to adopt and act upon the Circular. Finally, there is scope in support of the Circular for a review and a tighter definition of what constitutes a 'village'.
- 80.** A number of organisations including Brake, CPRE and others, and a number of individuals, suggested that some or all of the national speed limits should be changed. However, this issue would require primary legislation and was specifically excluded from the current consultation.
- 81.** Brake pointed out a contradiction in the suggestion that 30mph should be the norm, despite the guidance saying it is appropriate to consider 20mph limits and zones "in streets that are primarily residential and in other town or city streets where pedestrian and cyclist movements are high, such as around schools, shops, markets, playgrounds and other areas, where vehicle movement is not the primary function" - the majority of roads in built up areas. They consider that in keeping the default higher and mandating signing for lower speed roads, the government is ensuring a huge amount of local authority financial wastage on signage for widespread 20mph limits
- 82.** Many responses from individuals commented favourably on variable 20mph speed limits. There was a general dislike of road humps as a traffic calming measure and many mentions of the need for effective enforcement and education. A local authority commented that the guidance needs to be evidenced to allow management of public expectation of what 20mph speed limits or zones will achieve.

## Government Response.

- 83.** We have no plans to change the definition of a village. Traffic Authorities can already use their discretion in setting speed limits in and around villages.
- 84.** This consultation covered the local speed limits which may be set by traffic authorities in situations where local needs and conditions suggest a speed limit which differs from the respective national speed

limit. Changes to the national limits of 30mph on street lit roads, 60mph on single carriageway roads and 70mph on dual carriageways and motorways were not part of this consultation.

## Organisations who responded

20's Plenty for Us  
20's Plenty for Chichester  
AA Limos  
AB Driving School  
Abbey Motorcycle Instructors  
ADEPT's Traffic and Safety Working Group  
Alpha Driving Instruction  
Association of British Drivers  
Association of Chief Police Officers  
Avebury Parish Council  
Avebury World Heritage Site  
Barnsley MBC  
BDA driving school  
Bedford Borough Council  
Birmingham City Council  
Birmingham Cycling Campaign  
Bladon A4095 Action Group  
Bladon Junior Church  
Boxley Parish Council  
Bradley Parish Council  
Braintree District Council  
BRAKE  
Breinton Parish Council -  
Brenzett Church of England Primary School  
British Horse Society  
Buckinghamshire County Council  
Calderdale Metropolitan Borough Council  
Cambridge Cycling Campaign  
Campaign for National Parks  
Campaign to Protect Rural England  
Castle Hill School of Motoring  
Central Motors (Chard) Ltd  
Centre for Transport Studies, UCL  
Chartered Institution of Highways and Transportation  
Cheshire West and Chester  
Chieveley Parish Plan Action Group  
Child Accident Prevention Trust (CAPT)  
CirceDesigns  
Colchester Borough Council  
Colton Parish Council  
Cornwall and Isles of Scilly Primary Care Trust  
Cornwall Council  
Cotswolds Conservation Board  
CTC  
Cumbria County Council  
CycleKnutsford  
Cycleways (Warwickshire)  
Dartmoor Society  
Derbyshire County Council  
Devon County Council  
Dorset County Council  
Dovefields Residents Association  
Drive Plus  
Driveaway School of Motoring Limited

East Riding of Yorkshire & Kingston Upon Hull Local Access Forum  
East Sussex County Council  
Edenbridge Town Council  
Getting Britain Moving  
Gloucestershire's Rural Communities  
Great Alne Parish Council  
Great Snoring Parish Council  
Haddenham Safe Walking and Cycling Group  
Hadlow Parish  
Hampshire County Council  
Headcorn Parish Council, Kent  
Hertfordshire County Council  
Hiltons Driving School  
Holt Parish Council  
Ickham & Well Parish Council (Highways Officer) and A257 Traffic Group  
Ickleton Parish Council  
Institute of Advanced Motorists  
Ipswich Borough Council  
Keighley Area Driving Instructors Association  
Kemsing Parish Council  
Kinwarton parish Council  
Kirklees Council  
Land Access and Recreation Association Steering Group  
Leicestershire County Council  
Linkhill Road Group  
Living Streets  
London Borough of Islington  
London Borough of Merton  
London Forum of Amenity and Civic Societies  
M.A.D Driving School  
Magistrates Association  
Maidstone Borough Council  
Miserden Parish Councils  
Motorcycle Action Group  
National Health Service  
National Institute for Health and Clinical Excellence  
Newcastle City Council  
Norfolk County Council  
Norfolk County Council  
Norfolk road users - cyclists and motorcyclists  
North Yorkshire County Council Executive Members  
North Yorkshire Police  
Northumberland County Council  
Norwich City Council  
Nottinghamshire County Council  
Open Spaces Society  
Parish Councillors of Chilham  
PACTS - Parliamentary Advisory Council for Transport Safety  
Pathfinder Village Residents Association  
Pimperne Parish Council  
Pitchcombe Parish Council  
Potterne Parish Council  
RAC Foundation  
Ramblers' Association  
Ridewell Tees Valley

RoadPeace  
Rodborough Council  
Rotherfield Parish Council  
Royal Borough of Greenwich  
Royal Society for the Prevention of Accidents  
Safer Roads - Improving speed limits, safety and wellbeing  
Saltford Driving School  
Sevenoaks Cycle Forum  
Shamrock Driving School  
Shepway District Council  
SnowDog School of Motoring  
South Gloucestershire  
South Yorkshire Safer Roads Partnership  
Southwark Council  
SPEED (Safe pedestrians, equines, environment and drivers)  
Spokes East Kent Cycle Campaign  
St Albans Cycle Campaign  
St Martin By Looe Parish Council  
Staffordshire County Council  
Stewkley Parish Council Buckinghamshire  
Suffolk County Council  
Sussex Police  
Thames Valley Police and Hampshire Constabularies  
The Automobile Association  
The Ickleton Society  
Ticehurst Parish Council  
Toddington Parish Council  
Trail Riders Fellowship  
Transport for London  
Transportation Services Borough of Poole  
Tristar Driver Development & Coaching  
UK Metric Association (UKMA)  
Ulcombe Parish Council  
University of Birmingham  
Urban Design Group  
Warrington Borough Council  
Warwickshire County Council  
Welsh Government  
West Sussex County Council  
Westmaston Parish Council  
White Hart Estates Residents Association, Sevenoaks, Kent  
Wiltshire Councillor, Lyneham Division  
Wokingham Borough Councillor  
Woodstock Town Council, Oxfordshire  
York Council