



Speed Management Branch  
Road Safety User Safety Division, Zone 2/13  
Department for Transport  
Great Minster House  
76 Marsham Street  
London SW1P 4DR

Ref : DfT Speed Limit Circular

Dear Sir or Madam

First may we say that we are delighted that the Department has issued this revision to its guidance on setting local speed limits, DfT Circular 01/2006. We believe that since the time of developing 01/2006 there has been a real change in public attitudes to speed and the opportunity for widespread behavioural change, especially in residential and urban roads.

Our campaign has been towards the setting of 20 mph speed limits and we have been monitoring both the public demand for these and also the success of their implementation in such places as Portsmouth, Oxford, etc. We are in touch with campaigners, councillors and officers in most parts of the country and therefore feel well placed to comment upon the current attitude towards speed limit reduction. As our experience is particularly in the area of 20 mph limits then we will mainly comment on these changes rather than the "rural speed limits".

We believe that there were some major flaws in the 01/2006 guidance which were acting as a barrier to the appropriate and successful setting of appropriate speed limits within the guidelines. Your revised guidance does remove some of these barriers which we wholeheartedly welcome. Key aspects of the revisions which we welcome are :-

- Corrects some of the failures in 01/2006
- Aligns guidance with current best practice
- References latest evidence from Portsmouth
- Immediately replaces previous guidance
  - Chapter 5.1 and 5.2 no longer apply
  - Replaced by Appendix to Speed Limit Circular
- Provides "Green Light" for Total 20 schemes

With regard to your changes on 20 mph zones and limits :-

<ul style="list-style-type: none"> <li>Draft revised text is at Appendix A to this letter.</li> </ul>	See detailed comments
<ul style="list-style-type: none"> <li>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.</li> </ul>	<p>Whilst welcoming the encouragement of 20 mph limits and zones we still see a conflict between setting speed limits taking full account of the needs of vulnerable road users, and then avoiding the setting of such an appropriate limit because it happens to be a major through route.</p> <p>We note elsewhere that on A and B roads there is every encouragement to reduce speed limits by 10 or even 20 mph on such “major through routes” where there are very few vulnerable road users. It therefore seems contradictory to prohibit a reduction of 10 mph (ie 30 mph down to 20 mph) where pedestrian and cyclist movements are high.</p> <p>The inclusion of the “over time” qualification is rather ambiguous and does not provide any clear guidance. At best it will allow some authorities to respond with less urgency than is required. In any case “over time” has no meaning whatsoever unless the time in question is further detailed.</p>
<ul style="list-style-type: none"> <li>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.</li> </ul>	We are pleased to see increased flexibility and the inclusion of wider community benefits.
<ul style="list-style-type: none"> <li>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.</li> </ul>	Portsmouth demonstrated the powerful effect of behavioural change when a community goes through the due democratic process of making an authority-wide commitment to lower speeds. We are pleased to see this referenced.
<ul style="list-style-type: none"> <li>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.</li> </ul>	There does need to be greater flexibility in this area, particularly where an authority-wide approach is taken. We would prefer to see “20 mph town” gateways on the borders of such a community to indicate that unless otherwise shown then all streets would have a 20 mph limit. This would remove the need for repeaters on 20 mph roads and these would then only be needed on 30 mph roads. Hence making a considerable reduction in costs and street clutter.

<ul style="list-style-type: none"> <li>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.</li> </ul>	<p>We welcome this perspective on wider benefits. In particular such benefits always come from slower speeds and are perceived as a more realisable benefit than casualty reduction. Note that this does not imply that the benefits of casualty reduction are not real or substantial, but merely that most drivers do not envisage themselves causing any collisions.</p>
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We were very disappointed that the revision maintained 20 mph limits and zones only being considered in an urban context. Many villages are ideal for implementing a 20 mph speed limit on its residential roads. We would therefore welcome para 119 being modified in order to suggest the use of 20 mph limits and zones in a similar manner to that for urban roads.

We have commented on the detail revisions as shown in the Appendix to the Speed Limit Circular. These are shown in **[square brackets]**. We presume that the sections on 20 mph speed limits and zones will completely replace sections 5.1 and 5.2 of Circular 01/2006

### 5.1 20 MPH SPEED LIMITS AND ZONES

20 mph zones and limits are now relatively wide-spread, with an estimated over 2,000 schemes in operation in England, the majority of which are 20 mph zones.

There is clear evidence of the impact of reducing traffic speeds on reducing collisions and casualties, as accident frequency is lower at lower speeds, and where collisions do occur, there is a lower risk of fatal injury at lower speeds. Research shows that on urban roads with low average traffic speeds any 1 mph reduction in average speed can reduce the accident frequency by around 6 % (Taylor, Lynam and Baruya, 2000). There is also clear evidence confirming the greater chance of survival of pedestrians in collisions at lower speeds.

Further benefits of 20 mph schemes include quality of life and community benefits, encouragement of healthier and more sustainable transport modes such as walking and cycling. There may also be environmental benefits, as generally, driving more slowly at a steady pace will save fuel and carbon dioxide emissions, unless an unnecessarily low gear is used.

Based on this positive effect on road safety, and a generally favourable reception from local residents, we want to encourage highway authorities, over time **[Comment:- Remove the words "over time"]**, to introduce 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. **[Comment:- We believe that the existence of a major through route should not override the need to fully take into account the needs of vulnerable road users. Hence this qualification should be removed. If not it will simply be ignored by some local authorities and used as a defence of inappropriate speed limits by others.]**

Successful 20 mph zones and 20 mph speed limits should be generally self-enforcing, i.e. the existing conditions of the road together with any measures such as traffic calming or signing as part of the scheme, **[together with education and public engagement]** should lead to average traffic speeds 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.

Evidence from successful 20 mph schemes shows that the introduction of 20 mph zones generally reduces average traffic speeds by more than is the case when a signed-only 20 mph limit is introduced. Currently, zones make up about 90% of all 20 mph schemes in England.

Early evidence from the area-wide 20 mph limit scheme in Portsmouth confirms previous findings that the introduction of signed-only 20 mph limits reduced average traffic speeds by less than 20 mph zones (by around 1 mph). However, the Portsmouth scheme indicates that where average traffic speeds before the installation of 20 mph limits were above 24 mph, average speeds were significantly reduced, by around 7 mph. (Atkins, 2009). Early evidence also suggests that overall casualty benefits above the national trend are likely.

**[This idea of 20 mph speed limits being “self-enforcing” is inconsistent with the “underlying principles” as set out in Circular 01/2006. We believe that there is no reason why a 20 mph limit should have any specific requirements to be self-enforcing more than any other speed limit. This revised guidance is contradictory in that it identifies the benefits gained in Portsmouth from 20 mph limits which were not self-enforcing, yet sets a requirement for them to be generally self-enforcing. It is therefore appropriate that the need for self-enforcement should be removed or amended to include the education and public engagement which were implicit in Portsmouth’s authority-wide 20 mph limits].**

Circular Roads 05/99 (DETR, 1999) sets out the legislative regime for introducing 20 mph limits and zones and Traffic Advisory Leaflet 09/99 (20 mph Speed Limits and Zones) (DETR 1999a) gives additional advice on how and where to implement 20 mph speed limits and 20 mph zones. A comprehensive and early consultation of all those who may be affected by the introduction of a 20 mph scheme is an essential part of the implementation process. This needs to include local residents, all tiers of local government, the police and emergency services and any other relevant local groups.

It is important to consider the full range of options and their benefits, both road safety and wider community and environmental benefits, and costs before making a decision as to the most appropriate method of introducing a 20 mph scheme to meet the local objectives.

## **20 mph zones**

20 mph zones are very effective at reducing collisions and injuries. Research has shown that overall average annual accident frequency may fall by around 60%, and the number of accidents involving injury to children may be reduced by up to two-thirds. Zones may also bring further benefits, such as an overall reduction in traffic flow, where research has shown a reduction by over a quarter (Webster and Mackie, 1996), as well as a shift towards more walking and cycling.

20 mph zones are predominantly used in urban areas, both town centres and residential areas, and in the vicinity of schools. They may also be used around shops, markets, playgrounds and other areas with high pedestrian or cyclist traffic, though they should not include any major through roads. **[see comment above]** It is generally recommended that they are imposed over an area consisting of several roads.

A 20 mph zone is indicated by specially designed 20 mph zone entry and exit signs (TSRGD, diagrams 674 and 675). The statutory provisions (Direction 16(1) TSRGD) require that no point within the zone must be further than 50 metres from a traffic calming feature (unless in a cul-de-sac, where it may be up to 80 metres).

No additional speed limit or traffic calming signs are required within a 20 mph zone, as these are implicit in the 20 mph zone signs.

There may be cases where a wider area is considered for a 20 mph zone, but contains small individual roads or stretches of road where average speeds are already so low that a signed-only limit would be appropriate to achieve compliance. However, the introduction of 20 mph zones and 20 mph limits bordering immediately on each other should be avoided where possible as this and the signing to indicate this may be confusing for road users. The Department would recommend including these roads as part of the zone and use the available lighter touch traffic calming measures, such as overrun areas rather than more substantive engineering measures.

Where this is not practical, 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 traffic calming measures, within a 20 mph zone. Decisions will, however, be made on a case by case basis. **[Comment:- Given that many authorities considering authority-wide 20 mph limits will already have embedded 20 mph zones then greater flexibility is required in enabling a consistent signage. We would suggest the use of 20 mph gateways at the authority boundaries so that then 20 mph zones and limits may be mixed and not require repeaters. These would be limited to roads which had limits other than 20 mph].**

### **20 mph speed limits**

**[Previous]** research into **[isolated and]** signed-only 20 mph speed limits shows that they generally lead to only small reductions in traffic speeds. Signed-only 20 mph speed limits are therefore most appropriate for areas where vehicle speeds are already low. This may for example be on roads that are very narrow, through engineering or on-road car parking. If average speeds are already around 24 mph on a road, introducing a 20 mph speed limit through signing alone, is likely to lead to general compliance with the new speed limit. Early research from the area-wide 20 mph limit in Portsmouth suggests that greater reductions can be achieved through signed only limits where previous average speeds were significantly above 20 mph. **[Comment :- This is still contradictory. We understand that the primary factor in compliance on faster roads in Portsmouth was authority-wide nature of the limit and the degree of public engagement and commitment, together with some enforcement. Portsmouth has shown that when compliance becomes a “lifestyle” rather than a “driving” decision then the greatest opportunities for driver behaviour change can be realised.]**

The implementation of 20 mph limits over a larger number of roads, which we previously advised against, should be considered where the conditions are right. Highways authorities are already free to use additional measures in 20 mph limits to achieve compliance, such as some traffic calming measures and vehicle activated signs or speed cameras. **[Comment:- Please add “Public engagement and community involvement are particularly influential in increasing compliance”]**

A 20 mph speed limit is indicated by terminal speed limit signs, and repeater signs are required at regular intervals along the roads covered by the limit (TSRGD, diagram 670 and Direction 11). Where traffic calming measures are placed they should be signed in line with regulations (TSRGD Diagram 557.1-4 and 883).

### **Variable 20 mph limits**

Highway authorities have powers to introduce 20 mph speed limit that apply only at certain times of day. These variable limits may be particularly relevant where for example a school is located on a road that is not suitable for a regular 20 mph zone or limit, for example a major through road. To indicate these limits, variable message signs are available (TSRGD, Regulation 58). **[Comment :- We see little benefit from increasing speeds on such roads outside of school hours.]**

The Department has occasionally granted special authorisation for the trialling of a more cost-effective sign indicating “20 mph when lights flash”. Pending evidence about the level of compliance that can be achieved through this sign, the DfT may consider this as part of the signs review.

### **Traffic Calming Measures**

Traffic calming involves the installation of specific physical measures to encourage lower traffic speeds. There are many measures available to traffic authorities to help reduce vehicle speeds and ensure compliance with the speed limit in force. As set out above, these are required at regular intervals in 20 mph zones and may be used in 20 mph limits.

A recent review of 20 mph zone and limit implementation (DfT, 2009) shows that the vast majority of calming measures in use are speed humps, tables, cushions or rumble devices, so called vertical deflections, but highway authorities will want to consider the full set of available measures.

The Highways (Road Humps) Regulations 1999, The Highways (Traffic Calming) Regulations 1999 and Direction 16 of TSRGD give details of the traffic calming measures that meet the requirements for a 20 mph zone.

It is important to consider fully which measures might be appropriate for the specific local requirements. These calming measures range from more substantive engineering measures to lighter touch road surface treatments and include for example:

- road humps
- road narrowing measures, including e.g. chicanes, pinch-points or overrun areas,
- gateways
- road markings
- rumble devices.

**[Comment:- We believe that authorities should be able to include prevailing “natural” calming features such as tight bends, parking bays, pedestrian crossings, etc as calming measures]**

The DfT’s Traffic Signs Policy Review, announced in September 2008, will consider the requirements for traffic calming measures within 20 mph zones. Any changes to this would require regulatory change, and will be taken forward as part of the review.

The Department does not currently advise the use of average speed cameras to enforce 20 mph zones. Transport for London is working with some London boroughs piloting the implementation of some 20mph zones where average speed cameras will play a role in enforcing the speed limit. The evaluation of these pilots will show whether this approach has any benefits over existing measures and whether highway authorities may want to consider whether it is appropriate for their own areas.

As stated previously, we do welcome this changed guidance, but still believe that this does not exploit all the opportunities for benefiting from increased public awareness of the benefits of speed reduction and also acting as a catalyst for behaviour change. This is particularly around the benefits of an authority-wide approach to 20 mph being the default speed limit for residential roads.

There are two other concerns which we have regarding the Departments approach on 20 mph speed limits :-

**Pedestrian survivability at different motor vehicle speeds**

The DfT is almost unique in transport establishments in maintaining the view that 80% of pedestrians survive when in collision with a motor vehicle travelling at 20 mph. Many including WHO, ETSC quote a 90% survivability for pedestrians when hit by a vehicle travelling at 30 kph.

**Think! It’s 30 for a reason and Kill Your Speed or Live With It**

Whilst these advertising campaigns communicate the effects of pedestrian vulnerability both of them in their final frames re-inforce the idea that 30 mph is the correct speed limit for places where such a collision may have occurred. The Department is recognising the benefits to society of 20 mph speed limits for where roads are used by vulnerable users, yet at the same time spending considerable amounts of money telling people that “It’s 30 for a Reason”. The implication is that the “reason” is sound, yet we know that its based on what was considered appropriate for roads in 1934 and replaced no speed limit at all.

The effect of such advertisements in prejudicing the public, councillors and transport officers against lower speed limits should not be under-estimated.

Instead, we would like to see public information advertisements in favour of 20 mph as the maximum speed that is consistent with places where people live, shop, work and go to school.

We trust that these two subjects will be addressed by the DfT in support of its revised guidance.

If we can assist the Department in any manner then please contact me.

Best regards

Rod King

Campaign Director

Note

20's Plenty for Us works with communities around the country who wish to create a better environment through a more appropriate control of the speed of motor vehicles. A full list of the local campaigners and individuals supporting this response is shown overleaf :-

Local Campaign organisations that are members of the national 20's Plenty for Us campaign and others who have expressed support for this response :-

<b>Individual</b>	<b>Position</b>	<b>Representing</b>
Richard Bearman	Local Representative	20's Plenty for Norwich
Paul Cullen	Local Representative	Life begins @ 20 (Oxford)
Steve Kinsella	Local Representative	20's Plenty for Bristol
Tom McClelland	Local Representative	20's Plenty for Northern Ireland
Vanessa Kelly	Local Representative	20's Plenty for Histon & Impington
John Bannister	Local Representative	20's Plenty for West Bridgford
David Farnham	Local Representative	20's Plenty for Hackney
Anna Semlyen	Local Representative	20's Plenty for York
Bob Harper	Local Representative	20's Plenty for Upper Beeding
John Lightwood	Local Representative	20's Plenty for Southwell
Jeremy Leach	Local Representative	20's Plenty for Southwark
John Holms	Local Representative	20's Plenty for Chirnside
Philip Sams	Local Representative	20's Plenty for Ludlow
Ian Loasby	Local Representative	20's Plenty for Sheffield
Joe Peacock	Local Representative	20's Plenty for Birmingham
Stuart Jeffery	Local Representative	20's Plenty for Maidstone
John Cooling	Local Representative	20's Plenty for Ellesmere
Eve Barrett	Local Representative	20's Plenty for Shalford
John Taylor	Local Representative	20's Plenty for Swindon
Paul Finch	Local Representative	20's Plenty for Pixham
Bil Bailey	Local Representative	20's Plenty for Limpley Stoke
Brigitte Lechner	Local Representative	20's Plenty for Stockport
Sean Carney	Local Representative	20's Plenty for Scarborough
Brigitte Hickman	Local Representative	20's Plenty for Witney
Dick Follows	Local Representative	20's Plenty for Lancaster
Julian Lea Jones	Local Representative	20's Plenty for Henleaze
Susie Morrow	Local Representative	20's Plenty for Wandsworth
Ian Gilmour	Local Representative	20's Plenty for Wirral
Terry Hoey	Local Representative	20's Plenty for Belfast
Timothy Vaughan	Local Representative	20's Plenty for Tring & Birkhamstead
Margot Young	Local Representative	20's Plenty for Bodmin
Fiona Radic	Local Representative	20's Plenty for Peterborough
Mike Croker	CTC Right to Ride Rep	Steyning and Chanctonbury CLC
Anthony Cartmell	CTC Right to Ride Rep	Lancing, West Sussex
Rose Dixon		Ely Riverside Association
Ann Lumb	Councillor	Cheverell Magna Parish Council
Michael Brazier	CTC Right to Ride Rep	Southend
Richard Mallender	Local Representative	Nottingham Green Party
Alex Rothney	Local Campaigner	Hickling