



The Association of British Drivers

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Greater London Assembly

Via email: richard.berry@london.gov.uk

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Submission to the Inquiry into 20 Mph Limits in London

Dear Mr Berry,

We have the following comments regarding 20 Mph speed limits:

Road casualty figures are still a major public concern, despite the enormous expenditure on road safety measures in recent years. 20 mph zones have been shown to be successful in substantially reducing accident figures in London. However, such zones are usually implemented with a combination of other traffic engineering measures such as road closures, speed humps, road narrowing, entry treatments, improved signage, improved lighting and other measures. It is therefore difficult to separate out the effect of the speed limit change from other changes. Indeed Department for Transport guidelines require that such zones are generally "self enforcing" – in other words physical measures in addition to signs must be used to ensure compliance with the speed limit.

But there have been recent suggestions that a 20 mph speed limit on all roads in London except "priority roads", i.e. for "wide area" 20 mph speed limits.

We oppose the introduction of such wide area speed limits on all minor roads as we believe they are unrealistic and would be unlikely to be complied with. They would also be difficult to enforce – certainly at anything like reasonable cost. In addition they would be very expensive and would not likely be cost effective as a road safety measure.

We are not opposed to 20 mph zones in densely populated residential areas which are self contained and where the 20 mph speed limit can be combined cost effectively with road engineering and other road safety measures. In such areas, traffic speeds will be reasonably in conformance with the posted speed limit, as is known from studies of existing such areas.

There is no public evidence that introducing a lower speed limit by itself, or reducing the speed limit below what most drivers see as a sensible speed, has any beneficial effect on road accidents. To quote from DETR Circular 05/99 on 20 Mph Zones: "Extreme caution should be exercised when considering making 20 mph limits using speed limit signs with no supporting speed reducing features. The weight of evidence points strongly to signed only 20 mph limits have little or no effect on traffic speeds".

But putting up the required signage – and the associated road engineering measures mentioned above in a wide area scheme - would be enormously expensive. Every side road running off arterial or main distribution routes would require a 20 mph sign at enormous expense, and such signs would add to the existing street clutter significantly. It would be better to spend this money on road safety measures that are known to be cost effective and on roads where accidents are known to happen.

Incidentally one of the few London boroughs who have introduced proposals for a wide area 20 mph speed limit is Lewisham who have a penchant for road safety "gestures" driven by politicians who believe these are vote winning ideas – just look at the number of speed humps in that borough. But you should be reminded that Lewisham does not have any better road safety improvement record (i.e. casualty reduction record), than other boroughs such as Bromley. Other boroughs have achieved better results because money has been spent more wisely and on more specific measures with a concentration of effort on known accident locations. Lewisham's "wide area 20mph" policy is yet another example of the introduction of road safety policies by people who have little real knowledge of road safety issues.

The best way to set speed limits is to use the 85th percentile of traffic speeds. This has also been shown to produce the most cost effective and indeed safest speed limits. Reducing speed limits alone, without reference to existing traffic speeds on roads, and without any associated measures is not sensible and will not be beneficial.

There have been claims made that cities such as Graz in Austria have reduced serious injury accidents significantly by introducing lower speed limits, eg. by 24% in the first year. Was this statistically significant in the sense that it could not have happened by chance variation? I doubt it. In any case, any traffic engineer could have advised that the normal period used for determining the success of any traffic scheme is three years after versus three years before, because it is known that almost any changes to roads reduce the accident figures temporarily. A longer time is required to ensure that there is no distorting effect.

Comparing Graz with the London Borough of Bromley (of similar populations) and looking at the accident figures in 2006, although the Graz 20 mph scheme was introduced 15 years ago, the accidents figures for "KSIs" are almost identical and Bromley has one third of the "slight" accidents. There is clearly no evidence that Graz has a better accident record.

Likewise your Background Note suggests that Hull may be a good example of the success of 20 mph zones. I have seen similar claims for the success of speed hump schemes in Hull, but when I looked at the figures, these claims were spurious. Almost all the claimed accident reductions in Hull were down to people moving out of the city or moving from cycling to using motor transport.

Your comments in para 3.22 about the incidence of cycling in Hull are also misplaced – the high usage of cycles probably relates to the general poverty of the population in Hull which has a major influence on their life styles and road safety accident record.

Inappropriate speed limits, i.e. those that drivers see as unrealistic or unnecessary, simply cause traffic laws to be brought into disrepute. There is much more compliance with speed limits when drivers see them as suitable in all driving conditions for the road concerned.

Regrettably there has been an excessive focus on speed as the main factor in road accidents when recent figures from the Department for Transport show that it is simply not true. If you waste money on trying to reduce traffic speeds, when there are better ways to spend the cash to improve road safety, then you are doing a gross disservice to the community.

No road safety measures should be proposed without a proper cost/benefit analysis. At present, we do not even know what the cost of any proposed measures might be, and what complimentary measures if any are to be used to enforce the speed limit reduction, but in my view any these measures are likely to be very expensive, and not produce any significant benefits unless they are properly focused.

Other comments on your "Background Note" are as follows:

1. Under "Financial Implications" you claim that reducing casualties "has the benefit of saving money" and then go on to state that a fatal accident has an "average cost" of £1.19 million. This is grossly misleading. The way the Department of Transport calculates these claimed "costs" is to add the direct costs (hospital treatment, loss of earnings, damage to property) to an amount that the person concerned, or their relatives, might pay to avoid the accident. The former is swamped by the latter. So the total figure claimed is not a cost that would be "saved" in cash terms if the accidents and casualties were avoided. That figure is a small fraction of £1.19 million for a fatal accident. It is clearly wrong to represent the DfT figure, even though it may be a useful number for them to calculate, as being a possible "cost saving".

Incidentally if you are going to measure road casualty reductions in cash terms, then you should also put into the equation the cost of additional journey times imposed by reduced speed limits, which might be quite substantial.

2. Under speed as a factor in collisions, you overstate the importance of speed and totally ignore the other contributory factors which are more important, such as carelessness or "failing to notice". Speed reduction by itself is not a panacea whereas better roads and more attention to good road design is.

Your figure of speed as a contributory factor in 26% of fatal accidents is also misleading – the figure where speed in excess of the posted speed limit was a contributory factor (and of course not necessarily the most important factor, or indeed the cause) was actually 12%. And at present we are talking about reducing speeds below a speed limit alone so 12% is the more relevant figure.

Note that there is considerable discussion on the role of speed limits in road safety in our recent submission to the Transport Select Committee which can be seen on our web site at www.abd.org.uk/resources/documents/transcom_roadsafety_2008.htm and we recommend it to you.

Note incidentally that we would be absolutely opposed to the enforcement of 20 mph speed limits by speed humps or by speed cameras (wide area, or otherwise). It is very difficult for drivers to maintain speed consistently below 20 mph on all roads whatever the circumstances, and there is no evidence that enforcement of these lower limits has any particular benefit. I could go on at some length of the reasons we are opposed to such devices if you wanted me to submit it.

In summary we ask that the current policy for 20 mph speed limits remains basically unchanged, i.e. that such speed limits be only introduced in appropriate areas where they do not impact journey times significantly. They should not be imposed on main arterial or local distributor routes. And they should not be imposed by paranoid measures such as speed humps or speed cameras which impose major disbenefits, and large costs. on motorists for no benefit.

Yours sincerely

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London Co-Ordinator