

RE: The reply to your 20s Plenty correspondence, ref 290094 is attached



Rod King
To charlotte.bradford@dft.gsi.gov.uk

Reply Reply All Forward ...

Sun 14/06/2020 14:35

Dear Charlotte

Thank you for your letter commenting on our letter to the Secretary of State and Conservative MPs. Perhaps I may make some comments on your reply as I think it misses some of the key aspects of setting a national speed limit which we may not have communicated adequately.

Regarding local authorities having the power to set local speed limits, this is really part of the problem. They can do so in order to vary from the norm as set in the national limit. This works well where the roads that need a different speed limit are exceptions or in the minority. In such places where the topology, usage, demographics, etc are different from the norm then this is appropriate. Where such exceptions exist then it is appropriate to use signage or other methods to indicate the "unusual" speed limit. It worked well when 20mph limits and zones were sparse and isolated exceptions. However, we now have situations in authorities around the country where under the DfT guidelines they are setting 20mph as the correct and appropriate limit for most roads. These include most of our largest conurbations, including all the Inner London Boroughs. Treating 20mph as such an exception does impose considerably higher costs on traffic authorities, particularly for repeaters signs. This is illogical when most of the streets with lighting have a 20mph limit. Whilst purporting to provide consistency the process for setting 20mph limits for residential, high street and roads with potential (or actual) pedestrian and cyclist use on a local basis actually creates inconsistency. This inconsistency is created due to different traffic authorities having different priorities, funding and empathy with vulnerable road users and active travel aspirations. This is the reason why we have some towns with 20mph set for roads whilst other authorities may endorse a speed 50% higher for roads with an identical usage and physical proportions.

I recognise that the Department has no plans to set a national urban 20mph limit. I do prefer to use the word set rather than impose as it does sound a more positive intervention. Indeed, if it did have such plans then we would have a very different campaign. The consideration of "evidence that average speeds fall....." is rather irrelevant to the issue. Traffic Authorities with some 18m inhabitants have already recognised that most of their urban roads meet the character and parameters to qualify for a 20mph limit. It is illogical to suggest that most of the urban streets in other Traffic Authorities are any different in such parameters and character. The only logical conclusion is that either the speed limit set for the majority of urban streets for those 18m people is 33% too low or that the limit set for the rest of the population is 50% too high.

It is also illogical to argue that setting a national 20mph limit would require any more enforcement than that available to Traffic Authorities when they set 20mph limits. The same criteria would apply to enable them to set a 30mph limit for any lit-road exceptions where a 20mph limit would not be deemed to be appropriate. And, of course, it would be far more effective and economic for publicity to be done to support a national 20mph default than the current situation where Traffic Authorities have to counter the "30 for a reason" national publicity. The issue of out-liers who may exceed any speed limit should not be used to maintain a speed limit and endorse speeds 50% higher than is appropriate. To do so implies setting a speed limit based on the criminal actions of illegal drivers. Can you imagine an argument that resists an appropriate drink drive limit on the basis that it would not make any difference to someone drinking 6 pints of beer?

Of course it is useful for Road Safety GB to encourage all users to take extra care when travelling. However, the speed at which they drive will be condition by the speed limit set and there is a 50% disparity between urban streets set with a 20mph limit and identical streets that have a national 30mph limit. Regardless of the call to "take care" their reference point will be the speed limit and if that is 50% too high then so will be the reference point.

We have speed limits set nationally for motorways, non-urban roads and lit roads. They are changed as conditions and societal needs change. Hence the recent increase in the 40mph limit for HGVs on non-urban roads to 50mph. A default urban 30mph limit has been rejected as "not fit for purpose" by so many Traffic Authorities that it is no longer credible. A generic 30mph or 50km/h urban limit has been discredited by WHO, OECD, ETSC and so many Public Health and NGOs. Baroness Vere of Norbiton on behalf of the government recently signed the Stockholm Declaration that resolved :-

"We, Ministers and Heads of Delegations as well as representatives of international, regional and sub-regional governmental and nongovernmental organizations and the private sector gathered in Stockholm, Sweden, on 19 and 20 February 2020 for the Third Global Ministerial Conference on Road Safety;..... we hereby resolve to;.....

*Focus on speed management, including the strengthening of law enforcement to prevent speeding and **mandate a maximum road travel speed of 30 km/h in areas where vulnerable road users and vehicles mix** in a frequent and planned manner, except where strong evidence exists that higher speeds are safe, noting that efforts to reduce speed in general will have a beneficial impact on air quality and climate change as well as being vital to reduce road traffic deaths and injuries;"*

Perhaps you could clarify on how the resolution made by the Baroness impacts upon the Departments commitment to change in the area of "speed management".

The government is losing this opportunity to not only create safer streets for all, but also to lower the load on the NHS that comes from the 75,000 casualties per year on streets with a 30mph limit.

Whilst I accept that you have been charged with making the case for maintaining the 30mph limit set in 1934, I am afraid the case is not compelling enough for 20's Plenty for Us to accept it. Notwithstanding this, we would be pleased to work with you and government ministers to find ways to set a 20mph on most urban and village roads which we believe is the considered best practice in transport, urban planning and public health terms.

My best wishes

Rod

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20's Plenty for Us

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