

This document provides a critique of the draft Speed Management Strategy as published for public consultation by the Highways and Transport Committee of Cheshire East Council at the meeting on 16th Nov 2021. Members of the public may comment until 31st Jan 2022 on the Cheshire East website [here](#).

We advise rejection of the Strategy on several counts.

It is often the case in county councils that officers do not have experience of wide-area 20mph limits when implemented as a norm across communities. The setting of speed limits is often still seen as site-specific and traffic engineering process rather than recognising the move across society to demand and implement streets that are far more friendly to people outside of motor vehicles. 20mph limits are a key component of this and have a huge bearing beyond transport on public health, child independent mobility, elderly mobility, air quality, noise reduction as well as casualties.

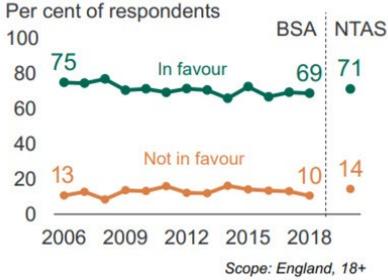
Currently 42% of the UK population live in local and national authorities where 20mph is, or soon will be, the speed limit on most urban and village streets.

We believe that the SMS as drafted fails to meet the requirements expected of the document in several areas. These are not regarding the case for 20mph limits, but whether the detail of the SMS is appropriate for councillors on the committee to make an informed decision regarding progressing its adoption.

Failures in statement within the SMS can be categorised as follows

1. Failure to objectively and accurately inform councillors for them to make appropriate decisions. In particular around creating “rules” that are not within DfT Circular 01/2013.
2. Failure to take into account latest research and information on the success of wide-area 20mph limits.
3. Failure to embrace the council’s commitment to 20mph as the correct default limit for most roads
4. Failure to meet particular requirements of the DfT Circular 01/2013 guidance
5. Failure to adequately show compliance with Equalities Act 2010

These are serious failures which make it difficult for councillors to fulfil their duty to make decisions on council policy in a fully informed manner. Our critique of sections within the SMS is below. Note that 20’s Plenty has worked with many authorities on the transition from a site-specific, street-by-street policy to one where deployment of 20mph is maximised with appropriate exceptions across communities and would be pleased to work with Cheshire East Council on such a development.

Section	Speed Management Strategy Content	Comment	Failing																					
1.1	Changing speed limits is not the default reaction to perceived issues relating to concerns of speeding traffic and a suite of options and tools is available to the authority and its partners. In using the principles of the 3 E's Education, Enforcement and Engineering the Council can promote the most appropriate approach in tackling a speed management concern to ensure the right solution is delivered.	We would maintain that given the request of the council to set a 20mph limit "wherever appropriate" then this paragraph is incorrect. The council does intend to change the speed limit on the majority of urban/village roads as a reaction to perceived issues. These are not necessarily for "speeding" vehicles but due to the reliance on the national 30mph limit which is considered inappropriate.	3.Failure to embrace the council's commitment to 20mph																					
	The Department for Transport, DfT, guidance Setting Local Speed Limits outlines how local authorities should approach the process and strategies of selecting appropriate speed limits within its area of responsibility. Speed limits should be evidenced and self-explaining and seek to reinforce people's assessment of what is a safe speed to travel.	<p>We would maintain that there is ample evidence both locally and nationally that the majority of people's assessment of what is a safe speed to travel in residential streets is 20mph. (70%) agree that 20mph is the correct and safe speed to travel on residential roads. See the 2019 National Travel Attitudes Survey -Wave 1 Page 10.</p> <p>Speed limits of 20mph in residential streets</p>  <table border="1"> <caption>Speed limits of 20mph in residential streets</caption> <thead> <tr> <th>Year</th> <th>In favour (%)</th> <th>Not in favour (%)</th> </tr> </thead> <tbody> <tr> <td>2006</td> <td>75</td> <td>13</td> </tr> <tr> <td>2009</td> <td>~70</td> <td>~15</td> </tr> <tr> <td>2012</td> <td>~70</td> <td>~15</td> </tr> <tr> <td>2015</td> <td>~70</td> <td>~15</td> </tr> <tr> <td>2018</td> <td>69</td> <td>10</td> </tr> <tr> <td>NTAS (2019)</td> <td>71</td> <td>14</td> </tr> </tbody> </table> <p>Scope: England, 18+</p>	Year	In favour (%)	Not in favour (%)	2006	75	13	2009	~70	~15	2012	~70	~15	2015	~70	~15	2018	69	10	NTAS (2019)	71	14	2.Failure to take into account latest research and information
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	In accordance with the published guidance, this strategy supports the principles set out in the guidance but also promotes a more holistic approach to speed management.	In fact, the strategy does not take a more holistic approach to setting management. In many places it leaves the setting of speed limits to be determined by the attitude of a small percentage of faster drivers (15%) rather than a more holistic view from all road users.	1.Failure to objectively and accurately inform councillors																					
2.1	Cheshire East's Speed Management Strategy sets out a consistent transparent approach that the Council will use to provide a safe highway network that promotes active travel as one of the Council's priorities as set out in the Local Transport Plan, LTP.	This may be the objective, but the rules implied within the policy defer to driver attitudes in maintaining current speeds and will maintain a suppression of active travel	1.Failure to objectively and accurately inform councillors																					

Section	Speed Management Strategy Content	Comment	Failing
	This strategy sets out a hierarchy of tools that the Council has available to manage speed and traffic flow to ensure the safety of all road users. These tools will be the basis on which the Council will respond to the many requests in relation to speed management and speed limit compliance that are received each year.	It is difficult to see how these rules will “ensure the safety of all road users” when it arbitrarily will retain 30mph national speed limits based on drivers believing that such a speed limit endorses driving at speeds which the SMS rules prevent from revising to 20mph.	1.Failure to objectively and accurately inform councillors
	The Council will consider these through a 3E’s approach supported by ongoing evaluation: Education, Enforcement, and Engineering.	The SMS seems to exclude “Engagement” which has been a key feature of authority-wide 20mph defaults in other authorities which have resulted in reductions of casualties between 20 and 40%.	3.Failure to embrace the council’s commitment to 20mph
2.2	The Cheshire Road Safety Group (CRSG) consists of representatives of Cheshire East, Cheshire West and Chester, Halton, and Warrington together with Cheshire Police, Cheshire Fire and Rescue Service and National Highways. The work of this group supports the aims of the strategy.	It should be noted that Cheshire West and Chester, Halton and Warrington have all adopted policies of a 20mph limit for most roads set as an authority-wide strategy.	
	The previous Speed Management Strategy was adopted in 2016. Since then, there have been a number of changes both locally and nationally that have been taken into account in the development of this strategy, including:	This fails to take into account the developing safe systems approach and the role of speed management. In particular it fails to note :- <i>UN/WHO best practice is that “in urban areas where there is a typical, predictable mix of road users (cars, cyclists, motorcyclists and pedestrians) a maximum speed limit of 30km/h (20mph) should be established, unless strong evidence exists to support higher limits”</i> UN Global Plan for Decade of Action on Road Safety 2021-2030.	3.Failure to embrace the council’s commitment to 20mph
3.1	The Speed Management Strategy is underpinned by national guidance and regulations on speed limits as well as the required speed limit review procedures.	This is patently untrue. The SMS in its “rules” for setting 20mph limits goes far beyond the national guidance to create a far more prescriptive process for setting such limits. This will be identified below.	1.Failure to objectively and accurately inform councillors

Section	Speed Management Strategy Content	Comment	Failing
3.2	Fair - We aim to reduce inequalities, promote fairness and opportunity for all and support our most vulnerable residents.	This SMS will actually maintain inequalities, particularly for vulnerable road users and those not in motor vehicles. To pretend that it does is to misinform members	1.Failure to objectively and accurately inform councillors
3.3	The Speed Management Strategy helps deliver the priorities of the LTP by setting out the criteria for how the Council will help manage issues of speeding in the Borough and the accommodation of active travel when setting speed limits.	The issue for many Cheshire East roads is not “speeding” (driving in excess of the speed limit), but a speed limit that is too high and endorses driving at speeds which are unsafe without exceeding the limit. It is difficult to see how a speed management strategy should be limited to “speeding”.	3.Failure to embrace the council’s commitment to 20mph
4.1	In response to community concerns the management of speeds will follow the 3 E’s of: Education, Enforcement, and Engineering.	The failure to include “Engagement” is a critical failure in the SMS. Note that the decision diagram takes a “street by street” approach that is “site specific” rather than addressing the issue of the national 30mph limit being inappropriate for most urban and village roads.	3.Failure to embrace the council’s commitment to 20mph
4.2	The Speed Management Group	We note that key contributors to any decisions on speed limit are excluded from this group. These include:- <ul style="list-style-type: none"> • Public Health • Education • Social Services • NHS services Speed limits and speeds have a consequence for each of these agencies and they should not be excluded.	3.Failure to embrace the council’s commitment to 20mph
5.1	Education covers local and national road safety campaigns which help raise road safety awareness in the wider population and the targeted education of drivers by various means of encouraging compliance with speed limits. The Council’s road safety objectives are to help: <ul style="list-style-type: none"> • Reduce the number of people killed and seriously injured in road traffic collisions, and • To reduce the number of collisions involving road users of all types. 	This definition of “education” fails to promote the value of setting appropriate 20mph limits as a default for urban and village communities. It seems to restrict itself to site-specific compliance rather than a more general approach to community engagement. This was very much a feature of successful authority-wide 20mph strategies such as the Calderdale “Love our streets” campaign.	3.Failure to embrace the council’s commitment to 20mph

Section	Speed Management Strategy Content	Comment	Failing
7.1	<p>A report from the Transport Research Laboratory found that static signs alone had a small impact on measured speeds, with around a 2mph reduction on average. Subsequent research has confirmed these findings and shown that speed limit signs alone are insufficient to significantly alter drive behaviour.</p>	<p>The TRL report dates from 1998 when there were no wide-area 20mph limits in the country. Hence it has no relevance to this 3rd decade of the 21st century and wide-area, authority-wide 20mph limits.</p> <p>The second report was based on a small number of early isolated schemes and only a single town-wide scheme. It has been widely criticised as not typical of modern 20mph wide-area, authority-wide limits.</p> <p>A 2mph “average” is misleading because it includes many roads which had low speeds before implementation and hence did not change.</p> <p>In practise 20mph limits without physical calming show a mix of reductions dependent upon pre-speeds. Reductions on higher speed roads previously above 24mph average tend to be 4-6mph and whilst not resulting in general compliance do represent a significant reduction in speed and casualties.</p>	<p>1.Failure to objectively and accurately inform councillors</p> <p>2.Failure to take into account latest research and information</p>
7.6	<p>Where there is not a consistent relationship between the 85th percentile and the mean speed, it will usually indicate that motorists have difficulty in deciding the appropriate speed for the road.</p> <p>This suggests that a better match between the road design and the speed limit is required. In such situations it may be necessary to consider the appropriateness of the limit or whether there is a need for additional design or enforcement measures.</p>	<p>Of course drivers may well have difficulty in deciding the appropriate speed for the road. That is why we have speed limits. Note that 85%ile speeds are determined by the 15% fastest and usually least law-abiding motorists. Note also that the current speed limit (which may be too high) is seen by those fastest drivers as endorsing their behaviour.</p>	<p>3.Failure to embrace the council’s commitment to 20mph</p>
	<p>This suggests that a better match between the road design and the speed limit is required. In such situations it may be necessary to consider the appropriateness of the limit or whether there is a need for additional design or enforcement measures.</p>	<p>This reflects “site-specific” view of setting speed limits which is different from that envisaged by Cheshire East Council which wants to promote 20mph as the maximum speed where motors mix with people. This para in the SMS ignores the Cheshire East aspiration to the alignment of speed limits to the presence of people and the engagement around this messaging.</p>	<p>3.Failure to embrace the council’s commitment to 20mph</p>

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7.8	<p>20mph speed limits and zones can be considered in built up areas where there are high concentrations of vulnerable road users where vehicle movement is not the primary function such as 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 motor vehicle movement is not the primary function.</p>	<p>The guidance actually says :- 84. Based on this positive effect on road safety, and a generally favourable reception from local residents, traffic authorities are able to use their power to introduce 20mph speed limits or zones on:</p> <ul style="list-style-type: none"> • 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. <p>This is in addition to</p> <ul style="list-style-type: none"> • 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. <p>Hence there is a clear divergence from the DfT guidance that calls for the inclusion of major streets and the SMS which seeks to exclude streets where motor movement is a primary function.</p>	<p>1.Failure to objectively and accurately inform councillors</p>
	<p>Mandatory 20mph speed limits and zones will only be considered in those locations that are generally self-compliant due to the nature of the road layout.</p>	<p>The DfT guidance uses the phrase “Schemes need to aim for compliance with the new speed limit.” Hence it is an “aim” and not a “condition”.</p>	<p>1.Failure to objectively and accurately inform councillors</p> <p>3.Failure to embrace the council’s commitment to 20mph</p> <p>4.Failure to meet particular requirements of the DfT Circular 01/2013 guidance</p>

Section	Speed Management Strategy Content	Comment	Failing
	<p>20mph zones without physical measures will only be considered:</p> <ul style="list-style-type: none"> • Where at least 90% of roads in the proposed zone have existing mean speeds of 24mph or below. • Where 0-10% of roads in the proposed zone have existing mean speeds above 24mph, but below 28mph. <p>If existing speeds do not meet these criteria physical measures will be required.</p>	<p>This is well beyond the guidance within 01/2013 which only states that :-</p> <p>The implementation of 20 mph limits over a larger number of roads, which the previous Speed Limit Circular (01/2006) advised against, should be considered where mean speeds at or below 24 mph are already achieved over a number of roads.</p> <p>This is not an exclusion of roads above 24mph.</p> <p>The rule in the SMS on %age of roads required to be below 24mph rather than averaging the speed on all the roads in the area is far more prescribed than guidance. We note that further “rules” on how to record the average speeds by excluding congested times are also more prescriptive than the guidance calls for.</p>	<p>1.Failure to objectively and accurately inform councillors</p> <p>2.Failure to take into account latest research and information</p> <p>3.Failure to embrace the council’s commitment to 20mph</p> <p>4.Failure to meet particular requirements of the DfT Circular 01/2013 guidance</p>
7.9	<p>Nationally there are two definitions for roads with 20mph speeds, these are:</p> <ul style="list-style-type: none"> • 20mph speed limits (indicated by road signage only), and • 20mph zones (self-enforcing areas with engineering measures and some road signage). 	<p>This misinforms. 20mph speed limits can also use carriageway roundels as repeater signs. 20mph zones now only require a single physical measure.</p>	
	<p>Where existing speeds are over 24mph, but below 28 mph, the implementation of a 20mph area will likely require traffic calming and/or technological measures to reduce and control speed to the appropriate levels and ensure self-compliance.</p>	<p>Members should be aware that the DfT now include repeater signs and carriageway roundels as “traffic calming” in 20mph zones. Hence the SMS is conflating physical calming and traffic calming which leads to confusion.</p>	<p>1.Failure to objectively and accurately inform councillors</p>

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	Advisory 20mph speed limits can be introduced outside schools. These advisory provisions are not legally enforceable but are a tool to encourage behaviour change. Any advisory 20mph speed will operate during school start and finish times.	Progressive and responsible councils across the country are looking to implement “safe routes to school” which includes the whole journey from home to school rather than the last 50m. Whilst we are aware that in the past Cheshire East has implemented advisory 20mph limits outside schools, these have not changed the legal speed limit which remains at 30mph.	1.Failure to objectively and accurately inform councillors
	Where a new housing development has been designed to be 20mph we would not introduce a 20mph speed limit.	Surely this should say “...we will introduce a 20mph speed limits.	3.Failure to embrace the council’s commitment to 20mph
7.13	Motor vehicle engines work most efficiently at around 50mph; vehicles driving below 50mph and above 55mph produce more emissions from their exhausts.	In an urban environment with repeated stops and acceleration it is quite complex. Given that to accelerate a vehicle to 30mph requires 2.25 times the energy to reach 20mph then the emissions will broadly follow this ratio for every acceleration from stationary. Recent research shows that repeated acceleration to 20mph rather than 30mph reduces CO ₂ by 26% and NO _x by 28%. (https://www.20splenty.org/new_research_on_emissions)	1.Failure to objectively and accurately inform councillors 2.Failure to take into account latest research and information
7.15	The physical design of new residential roads should encourage motorists to drive at 20mph or less as set out in national guidance, (e.g DfT Manual for Streets). The default speed limit for new residential roads is 30mph.	It is illogical to require a street to be designed for 20mph and then set a limit of 30mph.	3.Failure to embrace the council’s commitment to 20mph
Appendix A	Prioritisation Matrix	This is far too prescriptive and is a huge administrative burden. It includes may aspects which are outside the responsibility of a Highway Authority when setting speed limits.	

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Appendix D	<p>When analysing traffic speed data, it is important to look at the speeds that occur under free flow conditions, and therefore the 12 hour or 24 hour average mean and 85th percentile speeds may not be appropriate. It may be necessary to exclude peak hour data as congestion may have a significant effect on the results.</p>	<p>I know of no other Highway Authority in the UK that goes beyond the collection of average speeds along roads and filters out times when the road is congested or only includes free flow conditions. Both of these will skew the data and produce a higher average speed than actually exists. This is not a reflection of the guidance on setting speed limits and combined with the insistence of 90/10%ages of roads below and above 24mph will arbitrarily cap the setting of 20mph limits and hence maintain road speeds that suppress active travel and increase road risk to vulnerable road users as well as vehicle occupants.</p> <p>These technical rules seem to be created to minimise the implementation of 20mph limits and are far outside government guidance.</p>	<p>1.Failure to objectively and accurately inform councillors</p> <p>2.Failure to take into account latest research and information</p> <p>3.Failure to embrace the council’s commitment to 20mph</p> <p>4.Failure to meet particular requirements of the DfT Circular 01/2013 guidance</p>
Appendix F	<p>Cheshire East Council is bound by legislative requirements for 20mph Limits and Zones and as such all 20mph Areas will be laid out in accordance with these requirements.</p>	<p>This is incorrect. The guidance in 01/2013 is guidance and not legislative. Whilst a Highway Authority can diverge from guidance where the SMS does so this should be clearly identified. In implying that the rules are based on and part of the guidance as a “legislative” requirement then this is misinforming members of the validity of the SMS.</p>	<p>1.Failure to objectively and accurately inform councillors</p>
	<p>Just because a particular area may have one or more of these elements it doesn’t automatically mean that its suitable for a 20mph area. The whole situation should be reviewed including the guidance of experienced practitioners as appropriate.</p>	<p>Whilst respecting that practitioners involved in developing and using the SMS may be experienced, it is clear that the “experience” does not include the way that 20mph limits are being set for most roads in many local authorities.</p>	<p>1.Failure to objectively and accurately inform councillors</p>

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	<p>If mean speeds are 28 mph or less than the existing environment is likely to be suitable for a 20mph area with traffic calming.</p>	<p>Within the guidance there is no requirement that mandates that road with current speeds cannot be set with a 20mph limit using speed limit signs. The guidance specifically refers to roads in Portsmouth where this has been done and also quotes additional measures which can be used to lower speeds.</p> <p>Progressive councils are also using light touch engineering such as central white line removal, staggered parking bays, addition of cycle lanes, etc to change the nature of a street without recourse to physical calming.</p>	<p>1.Failure to objectively and accurately inform councillors</p>
	<p>Where 85th percentile speeds exceed 28 mph the existing environment is unlikely to be suitable for a 20mph area.</p>	<p>This is contrary to 01/2013 which specifically states in section 35 that “mean speeds should be used as the basis for determining local speed limits.” Note that this was changed in the 01/2006 guidance. The use of 85%ile for setting speed limits dates from the previous century.</p> <p>It must be asked how the duties of the council for road safety may be met if it implements a policy whereby the speed chosen by the fastest 15% of drivers within an existing limit that endorses 30mph are grounds for not considering a lower speed limit. There is a clear requirement within the guidance in para 32 that “the needs of vulnerable road users must be fully taken into account in order to further encourage these modes of travel and improve their safety.”</p> <p>This cannot be done if the flawed views of 15% of drivers are used to arbitrarily deny a community a lower 20mph speed limit.</p>	<p>1.Failure to objectively and accurately inform councillors</p> <p>2.Failure to take into account latest research and information</p> <p>3.Failure to embrace the council’s commitment to 20mph</p> <p>4.Failure to meet particular requirements of the DfT Circular 01/2013 guidance</p>

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20mph Technical Criteria	<p>20mph Zones</p> <p>In Cheshire East we sign 20mph zone and limits consistently. The minimum signing requirement for a 20mph zone is to have repeaters every 200m.</p> <p>TRSGD 2016 requires features at smaller interval than this. Therefore, if the proposed zone is made largely of traffic calming measures then additional signs will be required at no less than 200m.</p> <p>If the proposed zone is largely based on signing due to the environment being largely self-enforcing then designers should either reconsider the design approach and make use of a 20mph limit which would ultimately require less signs than a 20mph zone.</p>	<p>Most Highway Authorities understand that when setting community-wide 20mph limits then entering a 20mph zone signifies a whole area at 20mph rather than just a street. The TRSGD relaxation that zones now require only a single physical calming feature (which may well include a mini-roundabout or side street gateway) complemented by repeater signs or road markings enables them to expand legacy, small, isolated 20mph zones to include most roads in the community.</p> <p>Cheshire East should learn from such successful practices being used elsewhere.</p>	<p>1.Failure to objectively and accurately inform councillors</p> <p>2.Failure to take into account latest research and information</p> <p>3.Failure to embrace the council's commitment to 20mph</p>

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Table 3	In either a limit or a zone the minimum requirement for a repeater signage shall be no less than 200m spacing.	<p>This seems to conflict with TSRGD 2016 which states.</p> <p>For zones 13.5 In 20 mph zones the requirement to place traffic calming features at specified intervals (effectively 100 m) has been relaxed so that a minimum of one physical traffic calming feature is required. In addition to this, TSRGD 2016 requires any combination of physical features, upright repeater signs or road markings to be used at 100 m intervals. This should enable local authorities to reduce the number of physical traffic calming features where speed is already restricted because of the nature of the road.</p> <p>For limits 13.3 Similarly, the requirement to place at least one repeater sign along a speed limit has been removed. The onus is on the traffic authority to determine the appropriate provision of speed limit repeaters having regard to existing guidance. In deciding this, it is strongly recommended that consideration is given to the potential for challenge to the enforcement of the speed limit.</p>	<p>1.Failure to objectively and accurately inform councillors</p> <p>2.Failure to take into account latest research and information</p>
20mph public consultation documents	All consultation documents will state that a 20mph limit or zone will generally be self-enforcing with little or no police enforcement.	The DfT guidance states in para 85 “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.” There would seem to be a divergence between, “little or no enforcement” in the SMS and “routine enforcement” in the guidance.	<p>1.Failure to objectively and accurately inform councillors</p> <p>4.Failure to meet particular requirements of the DfT Circular 01/2013 guidance</p>

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Equality Impact Assessment	<p>Could there be a different impact or outcome for some groups?</p> <p>Yes, potentially for those who walk and cycle i.e. non-motorised forms of transport. Such highway users may benefit from the introduction of 20mph speed limits where a location is identified as being suitable.</p> <p>As such this Strategy will be viewed with greater importance by Highway users who are identified to be in the more vulnerable categories.</p>	<p>Whilst recognising the benefits of lower speed limits to vulnerable road users, the prescriptive rules associated with enabling a 20mph limit to be set will ensure that those vulnerable road users will not benefit from 20mph schemes which are outside those prescriptive rules. To present a SMS that is so prescriptive compared to other Highway Authorities is perverse.</p>	<p>5.Failure to adequately show compliance with Equalities Act 2010</p>

Section	Speed Management Strategy Content	Comment	Failing
Stage 3 Evidence	<p>Age Speed limits and management measures are based on the local environment of an area, function of the road and pedestrian movement. Speed Limits and speed management are not based on an individual's characteristics. However, in some locations the strategy will favour the non motorised user and in others it will favour the motorised user.</p>	<p>It is surprising that it has not been recognised that children's independent mobility to the age of 16 is entirely based on them being able to walk or cycle. There is evidence that pre-teen children do not have fully developed cognitive skills to protect themselves in an environment where motors travel at more than 20mph. Elderly pedestrians are far more likely to be endangered in a 30mph environment compared to 20mph.</p> <p>Non-motorised road users with the protected characteristics of age have not been fully considered in the SMS. There is virtually no recognition of their particular requirements or vulnerability. Simply including them as non-motorised road users who may gain or lose is not an acceptable consideration as required by the Equality Act 2010.</p> <p>Note that the same glib response is given to the protected characteristics of Disability, Pregnancy and Maternity, and Sex.</p> <p>Many disabilities are invisible and may also limit vision, hearing and mobility. All of these increase the danger in community streets.</p> <p>Pregnancy and Maternity also creates particular issues as a vulnerable road user.</p> <p>Sex is an issue because the majority of parents walking their children to school are mothers.</p> <p>There is no indication that the impact of the SMS on people with protected characteristics has been diligently considered.</p>	5.Failure to adequately show compliance with Equalities Act 2010

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We support UN and its call for default 20mph and 30km/h urban and village limits.

