

SURREY POLICE



"Cannon, Graham 40"  
[REDACTED]

27/07/09 08:58

To 'Nicholas Healey' [REDACTED], Clive  
Batchelor [REDACTED]

cc [REDACTED]  
[REDACTED]

bcc [REDACTED]

Subject RE: Proposed new speed limits in Surrey Heath

Nick,

I discussed this with Ian Haller some months ago and we agreed certain speed limit changes that we both felt were sensible and in accordance with SCC 's own speed limit policy and the guidelines issued by Dft. These included the change of Red Road and The Maultway to 50mph.

I see from the attached proposed order that it is your intention to promote a 40mph speed limit on both of the above roads. This is totally against your own assessment and the Dft guidelines. Whilst I accept that this is only guidance it must be used as best practice to ensure not only the consistency of speed limits, but compliance from the drivers. What is not acceptable is unrealistic speed limits that drivers do not conform to and which require a regular enforcement commitment from police. I would add that this is the Association of Chief Police Officers view and not just my own. The guidelines also state that if lower speed limits are to be introduced this should be done in conjunction with other engineering measures and not in isolation. I have not been informed of any other measures that are being considered at the above locations.

I have discussed the matter of enforcement with PC Mark Barry, who is the Surrey Heath Casualty Reduction Officer and responsible for the vast majority of speed enforcement that takes place in the borough. Our view is that due to the physical nature of both of these roads, enforcement cannot be carried out safely. There is nowhere to park the CRO van to enable camera enforcement to take place and the roads are not suitable for officers to perform laser enforcement which requires stepping out into the carriageway and stopping the offending vehicle/ driver.

Given all of the above and the lack of any supporting speed data I have no alternative but to formally object to this proposed order.

I would be happy to meet with you, any of your senior management and/ or the members of the Surrey Heath Local Transportation Committee to expand on the reasons for this stance. There have been numerous proposals/ introduction of unrealistic speed limits in Surrey over the last year or so and our concerns have been raised at the Transport for Surrey Forum by Paul Beard.

Clive,

We have discussed this issue at a number of Casualty Reduction Working Group Meetings recently. I really do feel that senior management within SCC should assess your current Speed Limit/ Speed Management policies. If they are deemed to be worthwhile then they should be adhered to, if not then they should be deleted. You should not have a policy that can just be ignored as and when Local Committee Members choose. I am aware that if a Local Committee decision is thought to go against a particular policy then it can be 'called in' by SCC Management, although I have not aware of this ever being done. I would welcome your thoughts on the above.

Regards,

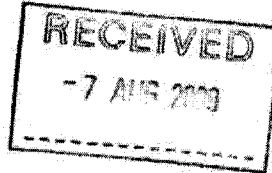
Graham Cannon  
Road Safety & Traffic Management Officer  
Roads Policing Unit, Bretlands Road, Chertsey, KT169QN

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

OBJECTOR 1

Cheylesmore Drive  
Frimley  
Surrey

03/08/2009



Dear Ms Isaac,

I wish to object to the proposed changes to speed limits as posted in the notice, "The Surrey County Council Various Roads in Surrey Heath (30mph & 40 mph Speed Limits) Order 2009".

I object to the 40 mile per hour limit proposed for The Maultway, Red Road & Old Bisley Road, for the following reasons:

1. The limits are unjustified. These sections of road are open & largely without housing adjoining them. If the justification for these changes is to improve safety, then measures targeting dangerous locations should be implemented (traffic calming devices & the like), rather than imposing blanket speed restrictions.
2. Imposing these limits will not reduce the speeds of traffic on these roads as enforcement of all limits in our area is infrequent & ineffective.
3. The limit changes will only serve to criminalise drivers using these roads who have driven safely within the existing limits for many years.
4. The changes appear to be another unjustified tax on motorists.

I am further disappointed to report that :

- I have e mailed Surrey Highways, but without response.
- That there is no information on your websites that cover these proposed changes. Making the plans "available" at only the libraries in the region is unacceptable when the internet is more accessible to the majority of the population.

I look forward to your response on these matters.

Yours sincerely

[Redacted signature]

[Redacted contact information]

OBJECTOR 2

Roundway  
Camberley  
Surrey

4 August 2009

To: Jenny Isaac  
Highways Dept  
Surrey County Council

Dear Miss Isaac

THREATENED LOWERING OF SPEED LIMITS

I have seen notices tied to lamp-posts with a list of roads where you are threatening to reduce the current speed limits.

I OBJECT TO EVERY ONE.

In particular I wish to object to the ridiculous 40mph for the roads and sections of roads given as (v), (viii) and (ix) in the second schedule.

No inkling of any reason is given, so I am left to suppose some do-gooding nanny in County Hall wants to interfere with our free movement, which causes no inconvenience to others and is perfectly safe; as a former racing driver I do know a little more about speed than you and your colleagues, let alone our so-called representatives on the Council itself.

Any increase in the amount of street furniture means more accidents, providing more 'targets', denying escape routes and distracting drivers who ought to keep their eyes on the road. By not having so many signs cluttering up the footpath, other countries can sweep them and clear snow without; this REALLY makes things safer for pedestrians!

Then we council-taxpayers will have to fund people to erect and maintain the signs, then monitor if anyone follows them, all unnecessary costs we cannot afford.

The annual number of road deaths in the UK has remained at about 3½ thousand for forty years, despite the unwanted doubling of the population - and a raft of silly schemes imposed by various levels of government. We motorists are sick and tired of so many different speed limits all over the place and I challenge anyone to list the speed limits around London's North Circular Road; many cannot even find the equivalent South Circular Road at all. If that is too complicated, try the A40 north-west of the M25.

There is nothing wrong, and nothing more simple, than just a 30mph limit in obvious built-up areas, and drivers should not have to check every tree to see if it is hiding yet another local variant, and in a rural county like Surrey we do have a lot of trees.

Yours faithfully

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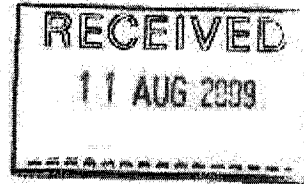
OBJECTOR 3

Ullswater Close  
Lightwater  
Surrey.

Ian Haller

6 August 2009.

Surrey County Council Highways  
Parking Strategy & Implementation Team  
Room 308A  
County Hall  
KINGSTON upon THAMES  
KT1 2DN.



Dear Sirs,

**THE SURREY COUNTY COUNCIL VARIOUS ROADS IN SURREY HEATH  
(30 MPH AND 40 MPH SPEED LIMITS) ORDER 2009**

I am writing to express my concerns at some of the measures contained in the above proposed order. Whilst I accept many of the proposals, the following concern me:-

SECOND SCHEDULE 40 Miles per Hour

- (v) The Maultway (B3015) Camberley – for its entire length
- (x) Red Road (B311) Lightwater – from its junction with The Maultway (B3015) to a point 61 metres west of its junction with Guildford Road (A322)

The Maultway (v) above, is bordered on one side by open land/military ranges and opposite occasional junctions and properties having their own access drives. The proposal is to impose a 40 mph speed limit despite a recommendation that a 50 mph limit is appropriate by both your professional and experienced engineers and the Police, the latter indicating that they do not support this significant speed limit reduction.

Red Road, Lightwater (x) above, is even more rural in its aspect being devoid of any adjacent properties for most of its length on either side of the road. Investment over the past years has resulted in engineering measures being installed together with improved chevron signs. I am sure that this investment has paid dividends and, as with the above, the recommendation is that a 50 mph limit is appropriate and the Police support this view, not one of 40 mph.

If these limits are imposed one has to question whether there will be effective enforcement. Unless static remote devices are used (enforcement cameras), the nature of both roads will make enforcement by other means extremely hazardous for both the enforcement authorities and occupiers of vehicles who are stopped. This is obviously recognised by the Police in their lack of enthusiasm for an unrealistic 40 mph limit. Nothing brings a law into disrepute more than one that is patently both unrealistic and unenforceable.

Another aspect is that it is widely recognised that vehicles travelling at 50 mph produce lower emissions as the vehicle is operating at an efficient level. In many cases, drivers will have to select a lower gear (whether the vehicle is automatic or manual) to maintain 40 mph limit. Vehicle emissions will rise as a result.

Finally, in preferring the *status quo* I am also concerned at the level of signing that will be required in the form of repeater signs should anything other than the current limit be imposed. Red Road in particular passes through attractive countryside and in accepting some form of regulation for safety reasons (bends etc.) the addition of sign clutter will rapidly reduce this to an urban road. Not conducive to retaining a rural separation between areas of population.

I hope the foregoing is taken into consideration before a final decision is made in respect of these two roads and my comments are seen as constructive and pragmatic.

Yours faithfully,

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83030358

OBJECTOR 4



Waterloo Close  
Camberley  
Surrey

19<sup>th</sup> August 2009

Jenny Isaac  
Head of Surrey Highways Parking Strategy & Implementation Team  
Room 308A  
County Hall  
Penrhyn Road  
Kingston Upon Thames  
KT1 2DA

Dear Madam Isaac,

SURREY COUNTY COUNCIL  
VARIOUS ROADS IN SURREY HEATH  
(30 MPH AND 40 MPH SPEED LIMITS)  
ORDER 2009

I wish to register my objection to the above named Order, specifically the THIRD SCHEDULE in it's entirety. My reason for objecting is that the proposed speed limit is unrealistic and unjustified for the roads in question.

It is a fallacy to believe that reducing a speed limit will automatically result in lower speeds. The Department of Transport Circular Roads 106, Appendix E, on the approach to speed limit setting for single carriageway roads in rural areas contains the following statements and advice:

Paragraph 1 - "Speed limits should be considered as only one part of rural safety management. The first priority where accident rates are high should be to seek cost-effective improvements to reduce these rates, targeting the accident types that are over-represented."

These statements reflect the results of experience and research on the effectiveness of speed limits, gathered over many years in the UK and abroad. On the **Red Road, Lightwater** route, which is classified as a rural route, there is already ample road signage and warnings to indicate to road users of any possible dangers, which amount to a series of simple bends and three clearly signed junctions, over the entire distance of the road. Some such signage,

including flashing warning signs, have been installed very recently, presumably after having made a similar assessment of the road at that time. I believe that the current measures have had a positive effect on warning motorists of potential hazards along this road. I would like to see the Council's evidence on the accident rates since these new initiatives were made, as part of their justification for restricting this route further is based on accident rate. I also question whether the council has looked into the direct cause of any accident along this route and can attribute it entirely to speed alone.

Appendix-E Paragraph 9 of Circular Roads 106 states "Mean speed should be used for the assessment. For the majority of roads there is a consistent relationship between mean speed and 85th percentile speed. Where this is not the case, it will usually indicate that drivers have difficulty in deciding the appropriate speed for the road, suggesting that a better match between road design and speed limit is required."

If the Council has evidence to prove that this is the case in **Red Road** including dates, times and exact locations of surveys, I would be pleased to see it. I note, however, that the existing 60 mph limit has been in force for a period of more than 10 years. I suspect that speed surveys were undertaken at that time and showed 85th percentile speeds that supported a 60 mph limit as realistic. Please include those survey results also. The character of the road has not changed significantly since the existing limit was imposed and I doubt whether actual speeds will have changed much either. If they have changed at all I would imagine that that is entirely due to the new 40 mph advisory signs that have been posted along this route which many mis-informed road users mistake for enforced speed limits, thus effecting the results of the mean-speed tests. This does not however stipulate the need for an enforced speed limit.

Dftcircular106 also recommends, in Section 3 paragraph 26, that " A study of types of accidents, their severity, causes and frequency, together with a survey of traffic speeds, should indicate whether an existing speed limit is appropriate for the type of road and mix of use by different groups of road users, or whether it needs to be changed."

This is applicable to both **Red Road** and **The Maultway**, another route which the Council seems to believe warrants a change in speed limit. I also wish to see the same evidence for **The Maultway** as for the **Red Road** surveys as the same objections can be carried from one route to the next.

The Circular does not rule out the introduction of a speed limit due to the lack of an accident history, but it continues by stating that " It may well be that a speed limit need not be changed if the accident rate can be improved or wider quality of life objectives achieved by other speed management measures. These

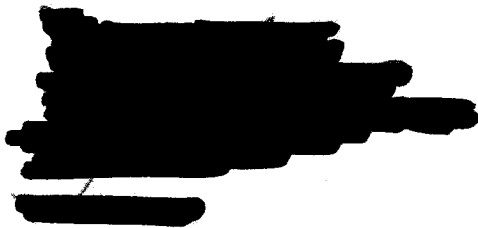
alternative options should always be considered before proceeding with a new speed limit." I would be interested to see what analysis of accidents has been carried out by the Council and how, if at all, options other than the proposed speed limit have been considered.

Unless the Council can provide evidence that it has fully considered and complied with Government advice in deciding upon this proposed Order, I will not be prepared to withdraw my objection to it. Drivers have a right to expect speed limits to be applied on a consistent and rational basis across the country. Furthermore, unrealistically low speed limits will lessen drivers' respect for all limits, to the detriment of road safety generally. There is a real possibility, therefore, that if an existing speed limit is lowered to a level which is unrealistic for the environment of the road in question, speeds and accidents could actually rise. There is even a possibility that a limit applied with disregard for Government advice could face a legal challenge from a motorist charged with exceeding the limit.

I am a resident on **The Maultway**, and use **Red Road** multiple times per day, along with thousands of other motorists who successfully navigate our path across the county without incident. The proposed orders for these roads are ill thought out and completely unjustified. Speaking with a number of my fellow residents on these routes many are concerned by the proposed actions of the Council, most querying why alternative actions have not been considered.

I would be grateful if you will acknowledge receipt of this objection and advise me of the means by which it will be formally considered by your Members. To add weight to this objection I am willing to put together a petition signed by local residents objecting to this order. Please advise by which manner this would be best conducted to order that it can be formally considered by your Members.

Yours sincerely,

A large area of the document is redacted with black ink, obscuring the signature and any text that might have followed. The redaction covers approximately four lines of text.

OBJECTOR 5

[redacted] Ian Haller/[redacted]



19/08/09 13:13

To "Ian Ha [redacted]"

cc

Subject B311 Red Road / The Maultway traffic speed limits

Dear Ian,

[redacted]  
Regarding another matter. I note from the public notices of Highways intention to amend the traffic regulations for the traffic speed along some local roads.

Can I place on record please my objection to the lowering of the speed limit on the B311 from 60 mph to 40 mph. It seems, if I'm correct in this, that earlier this year Highways were proposing a reduction to 50 mph for the full length of Red Road. What has happened to change minds?

While I can see advantages to a reduction to 50 mph, mostly concerning the junctions with local roads, and cyclists and pedestrians needs to cross the road to access the heathland. It seems to me there's an inconsistent treatment of this road to others in our area. Red Road is in part hilly, making the 40 mph limit somewhat impractical. Can we please at least have a period where the traffic speed limit is 50 mph.

Over it's entire length, Red Road has only a few houses that face on to it. I know I've argued in the past for a crossing point at the junction with Lightwater Road, but that stands on its own merit, and is not affected by the speed limit. I can see a time when people will be arguing the case for a further reduction to 30 mph.

I also object to the Maultway being set at 40 mph, again 50 mph would seem to be preferable.

Kind regards, [redacted]

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[redacted]