



I am a Road Safety and Traffic Management officer for Surrey Police and I am authorised to respond on behalf of the Chief Constable to the proposal to reduce the speed limit at the A245 Stoke road, Stoke D'abernon, Surrey from a 40mph speed limit to 30mph.

Surrey Police do not object to this proposal

- 1.1 Surrey Police fully support the Surrey County Council speed limit policy document “*Setting Local Speed limits – Surrey County Council’s policy*” and the corresponding DfT document 01/2013 “*Setting local speed limits.*”
- 1.2 I am grateful for the provision of the speed data that has been collected at various locations along this stretch of road. Having been included in the process of the data collection, I am confident that the data represents a fair reflection of the actual speeds of traffic.
- 1.3 Based on the data obtained from Surrey County Council indicating that the current average speeds are below the police enforcement threshold, the criterion for a reduction in the speed limit, without the need for supporting measures, has been met.
- 1.4 Step 6 and Step 8 of “The Surrey County Council speed limit policy” requires that I indicate to the council whether the Police would enforce and support the new speed limit. The police position, based upon ACPO guidelines is outlined below, with specific reference to this proposal.

The Southern perimeter

- 2.1 The Southern extent of the speed limit is not in a desirable location as the road neither looks or feels like a 30mph limit at this point. There is a lack of residential properties and the road is predominantly rural in nature. The road could be mistaken for one with a considerably higher speed limit. “*Speed enforcement is expensive; it is both time and resource intensive....Enforcing speed limits that are not clear; feel like roads with higher limits than in fact they are and tend to confuse rather than help those drivers that wish to comply, will lose that public support and confidence the police service needs. (Association of Chief Police officers, point 4.3. Speed enforcement policy guidelines 2011-2015, Revised).*”
- 2.2 Having discussed the issue with your engineer, I accept that from a technical aspect, the location for the southern extremity of the proposed limit, in the vicinity of the Chelsea training ground, is probably the most acceptable location for it to be sited. However, the geography of this southern end of the

limit, south of the junction with Station Road, is such that Police enforcement is technically problematic and therefore unlikely to be implemented.

Areas of concern

I have a number of areas of concern that I would like to bring to the councils attention for you to consider.

- 3.1 The current 40mph speed limit is reinforced by a number of “repeater” speed limit signs, intended to reinforce the speed limit to a driver. **All those repeater signs may have to all be removed** if the system of street lamps is found to be less than 183 metres apart; as such a system of street lamps prohibits the placing of such signs. In these circumstances we have evidence that **average speeds can actually increase** as drivers are not given the reminders of the speed limit. If the average speeds increase by as little as 3 miles per hour at this location, the council will have to implement potentially costly speed counter measures, as required by your policy, in order to get those average speeds down to below your policy parameters. An alternative would be to reinstate the 40mph limit.
- 3.2 A number of roads leading off from Stoke road are already subject to a 30mph speed limit. **All terminal 30mph speed limit signs relating to these roads will have to be removed as they will no longer be required**, as there will be no change in speed limit between these roads and Stoke Road. The removal of such signs may well lead to an increase in speeds for the same reasons as outlined in paragraph 3.1 above. I am therefore concerned that the speeds on roads such as Fairmile Lane, which is already an enforcement site, may increase as a direct result of this proposal.
“Mass defiance identifies questionable limits which maybe in inappropriate areas and rather than a need for high enforcement levels and prosecutions, which has the potential to lose public support, the speed limit should be reviewed ” (Association of Chief Police officers, covering letter dated the 17th May 2013, Speed enforcement policy guidelines 2011-2015, Revised.
- 3.3 There is a disparity between the mean average speeds and the 85th percentile speeds. Whilst the average speeds are within acceptable parameters, the 85th percentile speeds vary between 37mph and 39mph depending upon the location. Such disparities are identified by the DfT as indicating that *“drivers are having difficulty in deciding the appropriate speed for the road” (DfT 01/2013 paragraph 36)*. At this location, this disparity may be made worse by the removal of the repeater signs.

Collisions

- 4.1 *“A study of crashes, 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” (Dft, 01/2013, “Setting local speed limits”)*. An examination of the collision history for this location by me, has failed to reveal any collisions within the last three years where exceeding the speed limit has been identified as a contributing factor and therefore the reduction in the speed limit cannot be justified from a casualty reduction perspective. Stoke Road is currently ranked as 35th in the borough for injury collisions per kilometre. **A lack of speed related collisions would mean that this road would not be a priority for police activity.** *“Speed Limits should be evidence led, self explaining and seek to reinforce peoples assessment of what is a safe speed to travel. They should encourage self compliance”.* *(Section 1 of the Department for Transport circular 01/2006 “Setting Local speed Limits” and the updated version 01/2013*
- 4.2 If my concerns outlined above at paragraph 3.1 and 3.2 in relation to a potential for the average speeds to increase are found to be correct, then the

Dft document “Setting local speed limits” makes the following observation.
“The relationship between speed and the likelihood of collision as well as severity of injury is complex, but there is a strong correlation. As a general rule, for every 1mph reduction in average speed, collision frequency reduces by around 5%. (s2, para 13, DfT, “ Setting local speed limits”, 01.2013). It would therefore seem reasonable to suppose that an increase in average speeds should see a similar correlation with an increase in casualties. If this were to occur then the council may find it difficult to justify returning this road to its previously higher limit, in the face of an increased casualty problem.

Conclusion

- 5.1** The ACPO position is that police actions need to be prioritised and a lack of speed related collisions at this location means that the road would not be subject to regular enforcement unless there is intelligence to suggest that any offending was deliberate. **I do not possess any such evidence at this time and therefore the new proposed speed limit would not be the subject of regular enforcement.**
“Enforcement is mainly reactive and should not be seen as a preventative measure to achieve vehicle speeds. (Joining forces for safer roads 2011- 2015, Association of Chief Police officers, point 1.1.2. Speed enforcement policy guidelines 2011-2015, Revised).
“When a road looks and feels like the speed limit many will comply and where possible there will be a level of routine enforcement to support the limit. However, when a limit is confusing or unclear it will not be routinely enforced. However, where there is intelligence that there is either specific or widespread deliberate non-compliance of the limit, there should be targeted enforcement. (Joining forces for safer roads 2011-2015, Association of Chief Police officers, point 1.1.2. Speed enforcement policy guidelines 2011-2015, Revised).
- 5.2** If the council decide to go ahead with the proposal, I would be happy to arrange and support any residents request for a Community Speed Watch initiative. Should that initiative provide evidence of deliberate offending, then I would be happy to reconsider the police position in light of the policy statement outlined above in paragraph 5.1.
- 5.3** Residents concerned with speeding vehicles in this area will be able to have limited police activity considered through a borough, neighbourhood panel process.

I recognise that this is a difficult decision for the council. I hope that this report has been of some assistance in your decision making process and I am very willing to assist further should that be required.

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Central Neighbourhoods

Road Safety and Traffic Management Team (Strategic Road network, Tandridge, Epsom and Ewell, Reigate and Banstead, Mole Valley and Elmbridge)

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