



I am a Road Safety and Traffic Management officer for Surrey Police and I am authorised to respond on behalf of the Chief Officer, to the council's review of the extended 30mph speed limit on the A25 at Betchingley.

- 1.1 Surrey Police fully support the Surrey County Council speed limit policy document and the DfT document 01/2013 "Setting local speed limits."
- 1.2 I have been given the opportunity to read the report from your own engineer, Ms Gates and I fully agree with and support her findings.
- 1.3 The residents did not ask for a 30mph speed limit. They asked and expected an effective 30mph speed limit and that has not been delivered.
- 1.4 I fully support the council proposal to increase this section of road to a 40mph speed limit.
- 1.5 In so doing, I would like to make the additional observations.

#### Collisions

- 2.1 Speed limits are a road safety tool and are designed, in part, to give drivers information about the type of road and possible hazards they are likely to find.
- 2.2 This section of road has previously been subject to a 60mph and 50 mph limit. When it was reduced to a 30mph limit, this was not based on an attempt to address a collision issue, as this location, despite significant traffic flows, has never had a significant collision problem.
- 2.3 Increasing the speed limit from its current level will still therefore mean, that it is below historic speed limit levels and therefore, there is absolutely no evidence to suggest that the collision rate will increase as a result of an increase in the speed limit.

#### Police position

- 3.1 The current speed limit does not comply with the advice of the National Police Chiefs Council; The Department for Transport document and the Surrey County Council speed limit policy.
- 3.2 This section of speed limit does not look like a 30mph speed limit and does not comply with any definition that I have been able to find. You would not expect a 30mph speed limit to exist on a relatively straight road, where there are no properties on either side for a section of it, and where properties do exist, they are set back on a service road.
- 3.2 The general police position can be outlined by the following quotes from our speed enforcement policy guideline.
- 3.3 *"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).
- 3.4 “The service has limited capacity and resilience and will assume that if correctly placed, **speed limits will be self-enforcing** and that the roads authority will be responsible for ensuring that it meets those aims” (Association of Chief Police officers, covering letter dated the 17<sup>th</sup> May 2013, Speed enforcement policy guidelines 2011-2015, Revised)
- 3.5 **“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 17<sup>th</sup> May 2013, Speed enforcement policy guidelines 2011-2015, Revised)
- 3.6 “When a road looks and feels like the speed limit many will comply and where possible, the limit will benefit from routine enforcement. However, **when the limit is unclear or confusing it will not be routinely enforced.**” (1.1.2, Speed enforcement policy guidelines 2011-2015, revised)
- 3.7 **The quotes above are fully supported by the DfT document “Setting local speed limits”**
- 3.8 Two studies by the Home office (Huddersfield experiment, Sylvia Chenery, 1998) and the Rose Report 2002, (“*The criminal histories of serious traffic offenders*”) have identified a link between individuals that deliberately fail to comply with Traffic law and mainstream criminality. Essentially, mainstream criminals are unlikely to be compliant with Traffic law. Targeting accidental speeding offenders, where the limit is unclear and has failed to be reviewed in such a way to ensure that drivers are given every opportunity to comply, can seriously impact upon our ability to target serious deliberate offending and consequently impacts upon our ability to impact upon wider criminality.

### Current situation

- 4.1 One of numerous speed surveys that police have conducted over the last 5 years was undertaken in January 2018. It shows that there is an average non-compliance level with the current posted speed limit of 93.5%. The speed limit is therefore wholly inappropriate and completely unrealistic.
- 4.2 Daily traffic flows are around 14,000 per day. This non-compliance rate therefore equates to 13,090 vehicles breaking the speed limit every day.
- 4.2 **Such levels of non-compliance are well beyond being a police enforcement issue. The speed limit is fundamentally flawed as identified by the DfT and the Police as well as your own speed limit policy document.**
- 4.3 **I have refused permission for community speed watch to operate on this section** as it would be wholly inappropriate for them to operate in an area, where we already know that there is mass defiance of the speed limit, and where that speed limit does not comply with the guidance of the National Police chief’s council, or that of the Department for Transport. Allowing them to operate in support of an unrealistic speed limit would undermine the credibility of community speed watch and would harm the reputation of Surrey Police.
- 4.4 Police are in the road safety business. We are not in the business of revenue generation and enforcing unrealistic limits would leave us open to such a criticism.

### **Police preferred option**

- 5.1 The council speed limit policy gives you a number of options. I would suggest that leaving the limit as it is, is not an option because of the problems already identified. The current average speeds of around 40mph means that you could change the speed limit to 40mph and this is our preferred option.
- 5.2 A 40mph limit, would mean that the 30mph limit for the main part of Bletchingley would benefit from a “lead-in “ or buffer speed limit.
- 5.3 This will assist in moderating speeds in the main part of the village as drivers will not be entering the 30mph limit directly from a 50mph limit.
- 5.4 Such gradual changes or steps in speed limits assist traffic flows; bring speeds down before vehicles reach a correctly defined 30mph speed limit as well as having pollution reduction benefits.
- 5.5 A 40mph limit would comply with all the available expert advice as well as complying with the guidelines given to councils by the DfT. As such, **I would be able to support the 40mph limit by authorising community speed watch to operate in this section.**
- 5.6 Increasing speed limits within Surrey, to comply with the SCC speed limit policy and national advice, has been undertaken already at a number of locations. None of them has resulted in a significant rise in the average speeds. Indeed, I have evidence that in at least two locations, average speeds have actually reduced.

### **Conclusion**

The current speed limit does not look like a 30mph limit and does not comply with any definition of such a limit that I have been able to find. It is therefore unsurprising that many drivers are not identifying this as a 30mph limit and are failing to comply with the limit in such large numbers.

A 40mph speed limit would act as a desirable lead-in to the 30mph that exists for the main part of the village, where a 30mph limit would be expected by most drivers. Such a lead-in would avoid a 50mph limit leading straight into a 30mph; would therefore assist traffic flows by smoothing out speed differentials; assist in moderating speeds in the centre of the village; assist with vehicle emissions and would be compliant with all the available expert advice.

To support the new speed limit I would be prepared to authorise community speed watch to operate in the new 40mph limit as this new speed limit would be realistic and comply with all the available expert advice. In so doing I would be confident that their education actions could be completely justified.

### **Christopher D Cannon**

BSc (Hons), BSc (Open)

Dip Soc Sci (Open)

Cert HSC (Open), Cert Mngt Care (Open)

Operations command

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

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