

ANNEX 3

I am a Road Safety and Traffic Management officer for Surrey Police. I am authorised to respond on behalf of Surrey Police to the proposal to remove the existing traffic calming in Farleigh Road, between Harrow Road and Sunny bank and the removal of traffic calming in Harrow Road at Warlingham.

Surrey Police object to this proposal

- 1.1 Surrey Police fully support Surrey County Council's Speed Limit Policy and Speed Management Policy; DFT national guidelines and the ACPO speed enforcement policy guidelines.

Summary of objection

- 1.2 This proposal seeks to remove speed management solutions in Farleigh Road without producing any evidence to show that the removal would not have a detrimental impact on vehicle speeds or casualties; with no firm timetable from the council to reinstate such solutions or suitable replacements in the event of any increase in speeds or casualties and with no identified measure of what would act as a trigger for reinstatement of the speed management solutions. Average speeds in Farleigh Road are already close to the ACPO prosecution guidelines and even a few miles per hour increase in those averages would potentially attract prosecutions for 50% of drivers using this road.

Details of the objection

History

- 2.1 Point 1.1 of your committee consultation report states that "*The scheme was intended to reduce road casualties and has been largely successful, with the number of recorded personal injury accidents on the roads in the 5 years before and after the scheme decreasing by about 40%.*" (*Tandridge committee report, point 1.1, SCC report, 28th June 2013*). If the scheme has reduced casualties by 40% then by definition it has been successful. I can find no evidence that would support any suggestion that the removal of the traffic calming at this location would **not** have a detrimental impact upon the collision statistics or increase vehicle speeds. Indeed your own observations at point 1.1 of the committee report would appear to provide evidence against such a suggestion.
- 2.2 Prior to the installation of these speed management solutions, this road was subject to regular police enforcement and was a particularly productive site in terms of prosecutions. However, such productivity would suggest that the speed limit did not look and feel like the posted limit and therefore the speed limit was not being interpreted correctly by drivers. Without the benefit of engineering solutions and without any radical change in the environment, it would seem reasonable to suppose that we will return to the position, as it was pre installation of the speed management solutions, with a retrograde and unacceptable shift in responsibility from the County Council, back to the police in order to ensure compliance. This is contrary to ACPO policy and Surrey County Council's own speed policies

Current speed data

- 3.1 A continuous speed survey conducted between the 23rd July and the 31st July 2013 at Farleigh road showed that average speeds for eastbound traffic was 35mph and

westbound average speed was 34mph. These speeds are already close to the ACPO enforcement guidelines and the removal of these engineering solutions can reasonably be expected to increase average speeds. **Surrey Police has no desire or capacity to prosecute drivers of vehicles travelling at an average speed for the road, when that average speed is above prosecution levels because the limit is unclear or confusing or is not supported by engineering solutions or education.** It is our contention that speed management features give drivers additional information to bring clarity and reduce confusion and therefore reduce average speeds. This contention is supported by your own speed limit policy, Speed management policy, current DfT guidance and ACPO policy, as will be shown in the following paragraphs.

Existing environment

- 4.1 Farleigh Road is a mixture of environments with a more open environment at each end, with more residential properties in the middle section. Part of the road lacks a footway on both sides and part of the road has properties set back from the highway, with their access to the road suffering from restricted visibilities. Other sections of the road look and feel like a 30mph limit. Harrow Road is also a mixture of environments with a more open environment at one end. Part of the road lacks a footway on both sides whilst part of the road looks and feels like a 30mph limit. Sufficient street lighting along both roads means that repeater (reminder) speed limit signs cannot be installed. A long (0.7km) straight section in the middle of the Farleigh Road limit, with no serious vertical alignment issues means that speeds will potentially increase with unrestricted visibility. Having a different speed limit for each short section of individual environments is impracticable and potentially unenforceable and the desire of the County Council to encompass a whole stretch of road with one speed limit is completely understandable. However, it would then be for the County Council to ensure that the road looks and feels like the desired limit and engineering solutions are such a tool to achieve this.

Current policies, advice and guidance documents

- 5.1 Speed limits should “*not be set in isolation and should encourage self compliance*” (DfT, Circular 01/2013 “*Setting local speed limits*”). How removal of the speed reduction features will *encourage self compliance*” is unclear. This DfT circular is supported by Surrey County Council and the Association of Chief Police Officers and removal of successful traffic calming would therefore appear to be contrary to both of those organisational aims.
- 5.2 Indeed, the Association of Chief Police Officers has already made it clear that “*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 17th May 2013, Speed enforcement policy guidelines 2011-2015, Revised) How removal of successful traffic management can achieve those aims is unclear.
- 5.3 I submit that it is the mixture of environments that can cause confusion in a drivers mind as to what the speed limit is and it would therefore be the responsibility of the County Council to provide guidance on this issue. Guidance in the form of engineering solutions to physically reduce speeds is an effective tool and by the Councils own statistics, has been successful at this location. Removal of these effective engineering solutions, without any replacement by any alternatives will mean that the road will revert to a mixed environment, pre 1995 time, which required substantial Police resources to enforce. With this in mind I bring to your attention the following statement from the Association of Chief Police officers. “*When a road looks and feels like a speed limit, many will comply and where possible there will be*

- a routine level of enforcement to support the limit. However, when the limit is confusing or unclear it will not be routinely enforced.” (Association of Chief Police officers, point 1.1.2. Speed enforcement policy guidelines 2011-2015, Revised).*
- 5.4 The policy aims of the Surrey County Council Speed limit policy state” *To ensure that appropriate speed limits are used effectively alongside other speed management measures to increase the safety of all road users and to suit the function of the road” (SCC Speed limit policy, Nov 2010).* The removal of the speed cushions and their lack of any replacement speed reduction features at these locations would appear to be contrary to your own policy, particularly when the speed limit boundaries encompass differing environments
- 5.5 “**Effective speed management is part of creating a safe road environment”** (DfT, Circular 01/2013 “Setting local speed limits”). Removing speed management that has proven to be effective (see 2.1 of this report) would again appear to be contrary to DfT advice.
- 5.6 “*The relationship between speed and likelihood of collision, as well as severity of injury is complex, but there is a strong relationship.* (DfT, Circular 01/2013, section 2.13, “Setting local speed limits”). The removal of speed management solutions is likely to lead to an increase in speeds and an increase in collisions and this supposition is supported by the evidence provided by yourselves of the effect of the installation, some 18 years ago when injury collisions reduced by 40%. I can find no evidence that the situation, as it existed, pre- installation of speed management, would not be repeated with a corresponding increase in injury collisions. Surrey County Council have failed to provide any evidence that would support a hypothesis that removal of speed management would not increase collisions or injuries, indeed your own statistics appear to argue against it. This is a contradiction and Surrey Police cannot therefore support any actions that would be likely to increase injuries.
- 5.7 Surrey County Council speed limit policy aims, state” *To ensure that appropriate speed limits are used effectively alongside other speed management measures to increase the safety of all road users and to suit the function of the road”.* Removal of such speed management would therefore appear to be contrary to your own policy.
- 5.8 The ACPO speed enforcement policy document states, “*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).
- 5.9 In relation to speed limits “*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 (Dft, 01/2013).* If the council believes that speed management at this location is ineffective and not needed, and will not lead to an increase in collisions, then we ask that you comply with DfT guidelines and review the speed limit, as average speeds are already close to national prosecution thresholds.

Additional considerations

- 6.1 A new, properly maintained smooth road surface, without the benefit of physical speed management solutions may well increase speeds as drivers lose some of the physical clues, felt through their steering wheels, as to what speed they are actually travelling.
- 6.2 I am concerned that no funds have been identified to reinstate the scheme if vehicle speeds are found to have increased. In any interim period Police may be expected to pick up any enforcement responsibilities. This is of particular concern when there has been no mention of what time scale would be required to find the reinstatement money or to reinstate the speed reduction measures.

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- 6.3 I can find no mention in the report as to what levels of increased speed or increase in casualties would have to be reached in order to trigger the reinstatement of the engineering solutions. Without this information Surrey Police cannot possibly support this course of action as to do so could potentially commit us to an open ended commitment to enforce the limit.
- 6.4 Comparing the removed scheme in Sunny bank with this location is erroneous as this location does not have the same large scale “on road” parking issues that have a reducing effect on average speeds. This is not a “like for like” comparison.
- 6.5 Retaining the kerb build outs (2.2 of your analysis) without the benefit of the speed cushions is unlikely to have a significant speed reduction benefit as the distance between them is very long, the section of road between them contains a mixture of environments and a driver approaching from either direction will only have to moderate their speed to negotiate one of them at the very start of entering that section of road. I also note however, that the questionnaire given to residents includes their removal as an option.
- 6.6 There appears to be a contradiction in the Council’s analysis in that the traffic calming in the vicinity of Warlingham village school is to be retained (point 2.3 of your analysis). This suggests that the Council accepts that speed cushions are an effective speed reduction solution. Why then would the Police, with our road safety and enforcement responsibilities, support the removal of engineering solutions that the Council accepts is an effective speed reduction technique?
- 6.7 If the speed management at Farleigh Road were to be kept and the speed management in Harrow road were to be removed it is a strong possibility that Harrow Road could be used as a “rat run” to avoid the Farleigh Road scheme. In order to gain a time advantage, drivers will inevitably travel at a faster speed in order to maximise that potential, with a subsequent increased risk of a collision.
- 6.8 Harrow road suffers a large “on street” parking issue and increased vehicle speeds past parked vehicles is a hazard to pedestrians and other vulnerable road users.
- 6.9 I have searched police databases for details of any recent collisions or details of complaints by the public concerning excessive speed at this location. Moreover, I have also spoken at length with the Casualty reduction officer for Tandridge, PC Moira Cocks about this issue. We are unaware of any speed complaints or collisions in Harrow Road. With this in mind Surrey Police would be very reluctant to do anything that could jeopardise this satisfactory state of affairs and I submit that this provides further evidence of the effectiveness of the existing speed management.

Conclusion

- 7.1 The removal of successful speed management engineering solutions at this location pre-supposes that average traffic speeds will not increase accordingly. I can see no evidence to support that supposition.
- 7.2 The removal of successful speed management engineering solutions at this location pre-supposes that there will be no increase on the number of collisions or injuries. I can see no evidence to support that supposition. Indeed your own figures would suggest otherwise and Surrey Police cannot support any actions that could potentially increase collisions or injuries.
- 7.3 The road at this point encompasses a number of different environments that a driver would not always recognise as relating to a 30mph limit. Such a section of road therefore requires education or engineering solutions to support the limit. This is recognised through your own Speed policies, DfT advice documents and ACPO. Removal of these successful engineering solutions would therefore appear to be contrary to all the available advice.

- 7.4 I can find no mention as to what time frame would be allowed to reinstate the Traffic management in the event of increased average speeds or increased casualty rates. Whatever the time frame, the expectation would be that Police will pick up the responsibility for enforcement in the interim period. The ACPO report clearly indicates that Police should not routinely enforce limits that are “unclear”. This would appear to be particularly pertinent when a perfectly successful engineering solution has been removed and not replaced.
- 7.5 Surrey County Councils own speed limit and Speed Management policies, as well as DfT advice documents identify that speed limits should be supported with education and engineering solutions. The removal of these successful solutions, thereby returning the road to a time where the speed limit was heavily enforced by Police; where prosecutions levels were high and where average drivers travelling at average speeds were being prosecuted, is an unacceptable situation to return to.
- 7.6 Average speeds are already close to prosecution levels and a small increase in those averages will mean that drivers travelling at average speeds could face prosecution. This is a wholly unacceptable situation as it is the responsibility of the County Council to provide an environment where drivers are given every opportunity to conform to the limit.
- 7.7 If the council believes that speed management at this location is ineffective and not needed, and will not lead to an increase in collisions, then we ask that you comply with DfT guidelines and review the speed limits, potentially increasing them to a level whereby drivers travelling at the average speed do not make themselves liable to prosecution.
- 7.8 With more research around the effects of the removal; research around projected future speeds; more information around the potential impact on casualty rates; a commitment to reinstatement finance; a reinstatement time frame and a clear criteria relating to the trigger levels for reinstatement, it could be possible that Surrey Police might support this proposal. Without this information Surrey Police are left with no option but to object to the proposal at this time, as all the available evidence seems to support an assertion that these actions will lead to an increase in injuries and Surrey Police cannot support an action with this potential consequence.

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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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