

**ANNEX 4**

**Redehall Road, Smallfield**

Surrey Police objection

I am a Road Safety and Traffic Management officer for Surrey Police and I am authorised to respond on behalf of Surrey Police to the proposal to remove the existing traffic calming in Redehall Road, Smallfield.

## **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 Redehall 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.

### **Details of the objection**

#### **History**

- 2.1 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

#### **Existing environment**

- 3.1 The road is a mixture of environments with some sections lacking residential properties and footways on both sides of the road. Indeed some small sections do not seem to fulfil the requirements of Table 2, contained within your own "Determining and applying speed limits" document. The hierarchy of preferred speed limits contained within this document appears to show that a 30mph limit should contain a density of 3 dwellings per 100 metres. Whilst I accept that this is only a guideline, it does suggest that Redehall Road contains a number of different environments that are not always associated with a 30mph limit. Having a different speed limit for each short section of individual environment is impracticable and potentially unenforceable and the desire of the County Council to encompass the 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

- 4.1 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.
- 4.2 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 17<sup>th</sup> May 2013, Speed enforcement policy guidelines 2011-2015, Revised) How removal of successful traffic management can achieve those aims is unclear.
- 4.3 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, 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).
- 4.4 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.
- 4.5 “*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.
- 4.6 “*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 of Speed management solutions in Farleigh Road at Warlingham, 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.
- 4.7 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).*

- 4.8 In relation to speed limits “*Mass defiance identifies questionable limits which may be 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.

### **Additional considerations**

- 5.1 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.
- 5.2 I am concerned that no funds have been identified to reinstate the scheme if vehicle speeds or casualties are found to have increased. This is of particular concern when there has been no mention of what time scale would be required to find the reinstatement money, if it is required.
- 5.3 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 any 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.
- 5.4 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.
- 5.5 If as suspected, average speeds increase then there may be an issue with vehicles entering the 20mph zone in the centre of the village, at too fast a speed; potentially compromising any benefits of that speed reduction zone.
- 5.6 It is not proposed to remove the speed cushions in Farleigh Rd, Warlingham in the vicinity of the village school and this would suggest that the Council recognise the benefits of such engineering solutions in moderating vehicle speeds. In Redehall Road there are speed cushions in the vicinity of “Redehall preparatory school” and yet the proposal is to only consider “*retaining appropriate measures*” (*point 2.6 of the committee report*). There therefore appears to be a contradiction in the implementation of these plans.

### **Conclusion**

- 6.1 The removal of speed management engineering solutions at this location assumes that average traffic speeds will not increase accordingly. I can see no evidence to support that assumption.
- 6.2 The removal of speed management engineering solutions at this location presupposes that there will be no increase on the number of collisions or injuries. I can see no evidence to support that supposition. Surrey Police cannot support any actions that could potentially increase collisions or the risk of injuries, even if only for an interim period.
- 6.3 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 engineering solutions would therefore appear to be contrary to all the available advice and your own policy.
- 6.4 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 indicates that Police should not routinely enforce limits that are “unclear”. This would appear to be particularly pertinent when a successful engineering solution has been removed.
- 6.5 Surrey County Council's 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 prosecution levels were high and where average drivers travelling at average speeds were being prosecuted, is an unacceptable situation to return to.
- 6.6 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, potentially increasing it to a level whereby drivers travelling at the average speed do not make themselves liable to prosecution.
- 6.7 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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