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Date
15th July 2009

Your ref
za/20mph/okus

Our ref
IC/RB

Reply contact name is
Chief Inspector Ian Copus

Dear David

Reference: Objection to Proposed 20 mph Okus Speed limit

I am writing in response to the Public Notice issued on the 25th June 2009, in respect of proposed 20 mph speed limits in the Okus area of Swindon. The proposals are such that I must take an unusual step and lodge a formal police objection. My reasons are detailed below.

The statement of reason indicates that the speed limits form an integral part of the Okus Traffic & Transport study, PC Roger Blythin, met with council officers and your consultants HALCROW on 22/8/07 to discuss the transport study, but has had no contact in respect of this since. The proposals here are very much different, and I understand no physical Traffic Management features to support the limits are proposed.

Of the fifteen roads listed, I would object to the proposals on three; Mill Lane (section), Westlecot Road, and Springfield Road, albeit these three roads are one continuous length, and express reservations concerning Goddard Avenue, and Quarry Road. I would point out here that an expression of reservation would normally be made at the informal consultation phase for consideration of the designers, which on this occasion has not taken place in respect of these particular aspects, so they could not consider the police view point when balancing the design elements.

Objection Mill Lane (section), Westlecot Road, and Springfield Road

Dft Circular 01/2006, (referring to *Traffic Advisory Leaflet 09/99*), highlighted the need for 20 mph restrictions to be self enforcing, and in respect of limits only used where actual traffic speeds are in effect already at an acceptable level for a 20 mph limit, guidance indicates acceptable values would be an average speed of 24 mph or below. I would point out that even at this value an eighty fifth percentile speed of 26- 27 mph might be seen which would no doubt raise some concern within the community. Any higher percentage observed speeds would generate significant concern within the community.

The Association of Chief Police Officers (ACPO) have an established position in respect of enforcement of 20 mph restrictions which takes full account of the DfT circular. Wiltshire Police fall in line with this position, to summarise;

ACPO supports 20 mph limits to reduce danger to vulnerable road users in residential areas. The aim of a 20mph limit must be for maximum compliance and safety, not acceptance of widespread non-compliance and enforcement/prosecution of motorists who may well have complied if it were obvious to them through engineering at the site. Police cannot resource the enforcement that is necessary if sites are not engineered, and doubt the public will support this if it simply results in many motorists facing prosecution and the danger initially identified remaining.

I have no speed data for this section of road, and cannot conduct a comprehensive survey in the time available before I must respond. Enquiries with your officers indicate surprisingly that no survey has been done. Anecdotally I would expect average speeds in this 30 mph section of road to be significantly higher than 24 mph, as your surveys showed for the parallel and similar Okus Road. In the absence of evidence to the contrary it is reasonable to assume that the introduction of a 20 mph speed limit on this section will not affect current speeds, which I believe will be significantly above 20 mph, and would lead to public dissatisfaction and confidence in the scheme, the council and inevitably the police, to no benefit. It is perhaps pertinent to emphasise, there have been no speed related injury collisions on this section of road, or any clusters of collisions in the preceding three years.

I cannot envisage a workable 20 mph speed limit on this section, if a 20 mph restriction is judged necessary, then a properly engineered scheme would in my view be required. The 2007 proposals were to maintain a 30 mph limit but incorporate build outs.

Reservations- Goddard Avenue, and Quarry Road.

At present traffic uses Mill Lane, and Goddard Avenue, as a short cut from the South of the town to Old Town, by the nature of such traffic compliance with a 20 mph limit would be particularly poor. Whilst Mill Lane will be closed in due course, and the situation improved, this continues to be postponed whilst the Whichelstowe development is held up by the economic climate. In consequence there is a danger the proposed limit will fall into disrepute, where as it may have been successful had it been introduced after the Mill Lane Closure.

In respect of Quarry Road, we have had reports of excessive speeds along this section by a very small number of drivers, given the proximity of the Town Gardens, and play areas coupled to the absence of parked vehicles most of the time this section would benefit from a 20 mph engineered zone rather than limit, although I suspect the average speed will meet the criteria for a limit.

Yours sincerely

Ian Copus
Chief Inspector
Head of Roads Policing