

Director of Law & Democracy
Stockton On Tees Borough Council
Municipal Buildings
Church Road
Stockton On Tees TS18 1LE

Date 19/10/2007

Dear Sir,

A1044 Low Lane, Leven Bank Road Stockton-On-Tees, Speed Limit reduction order

I wish to register my objection to the above named Order.

My reason for objecting is that the proposed change to the speed limit is unnecessary, unjustified for the length of the road in question and the change will not achieve the objective of accident reduction claimed because the wrong causes are being addressed.

It is a fallacy to believe that reducing a speed limit will automatically result in lower speeds, or reduced casualties. The Department of Transport Circular Roads 1/93, on the use of local speed limits, contains the following statements and advice:

Paragraph 5 — "Specific speed limits cannot, on their own, be expected to reduce vehicle speed if they are set at a level substantially below that at which drivers would choose to drive in the absence of a limit."

Paragraph 6.4 — "Speed limits should be lowered only when a consequent reduction in vehicle speed can reasonably be expected. A survey of traffic speeds should indicate whether a lower limit will, in the absence of regular enforcement, be likely to result in lower actual speed."

These statements reflect the results of experience and research on the effectiveness of speed limits, gathered over many years in the UK and abroad. It has been found repeatedly that when unrealistic speed limits are raised to sensible levels, not only do speeds not rise but they may actually fall, as may accidents. The previous guidance on the setting of local speed limits, Circular Roads 1/80, contains information on UK experience of the effects of altering speed limits, as Annex E to that Circular. Although the Circular itself has now been superseded, the experience on the effects of speed limits remains valid. There is a real possibility, therefore, that if an existing speed limit is lowered, actual traffic speeds and accidents could actually rise.

More recently, and perhaps more importantly, Dft analysis for causation factors for accidents have shown that observational errors are the greatest contributory factor with in excess of 35% of accidents identifying this as a contributory factor, with "exceeding speed limit" contributing in just 5% of cases. (Source Road Accidents Great Britain 2006). I also note that "Junction errors" (overshooting the junction or failing to move off correctly) are a contributory factor in 4% of accidents.

I would be interested to see what analysis of accidents has been carried out by the Council, any trends in the causal nature of any accidents, the assessment and evidence of the relationship between the proposed speed limit and reduced potential for accidents or severity of accidents as noted in the Statement of Reasons, and what other options other than the proposed speed limit have been considered or are proposed to be implemented.

I would be grateful if you will acknowledge receipt of this objection and advise me of the means by which it will be formally considered by your Members.

Yours faithfully

David Botterill