

## North Yorkshire Police Representation (in full)

Thank you for your correspondence with regards to the making of 20mph speed limits under The York Speed Limit (Amendment)(No14/6) Order 2014 for Hospital Fields Road, York, Heslington Road, York and Broad Highway, Wheldrake. I have studied the proposals and offer the following observations on behalf of the Chief Officer of the North Yorkshire Police:

**Hospital Fields Road, York** – Hospital Fields Road is largely a none residential industrial estate. The only housing is set back from the road in units and flats. There are no residential properties with direct access onto the road. There are no speed related injury accidents recorded for Hospital Fields Road. Hospital Fields Road was recently investigated under the Road Safety Partnership Community Speed Management Protocol. After a 7 day deployment of covert data loggers, the mean speeds were found to be 23/23mph and the 85<sup>th</sup>ile were 30/30mph. This indicates that an unsupported 20mph speed limit on this road would be likely to be problematic from inception. The implementation of a 20mph speed limit could lead to a dangerous mismatch between what vulnerable road users were expecting and what was being delivered by drivers. I therefore have serious road safety concerns should a 20mph speed limit be enacted without other mitigation.

**Heslington Road, York** – Heslington Road between Barbican Road junction and the present 20mph speed limit terminal signs for the school safety zone for St Lawrences School, is presently subject to a 30mph speed limit. Speed data for the 20mph speed limit for this safety zone indicate mean speeds of 21/20mph and 85<sup>th</sup>ile of 24/24mph. This indicates that the present 20mph speed limit is working correctly. By extending the 20mph into an area, which does not appear to have the correct environment and will be unsupported by any mitigation there is a real possibility that the speed of traffic through the new area will have an unacceptably low compliance rate. This in turn will produce a dangerous mismatch between what vulnerable road users are expecting and what is being delivered by drivers. More importantly, the area where it is most important to have a compliance with the 20mph speed limit, outside of the junior school, is likely to see the speed of traffic rise and a subsequent more dangerous situation. I have serious road safety concerns for this scheme should the 20mph speed limit be enacted.

Hospital Fields Road and Heslington Road were discussed in detail by the 20mph speed limit working team with responsibility for implementation of the 20mph speed limit across the city and both locations were rejected for the above concerns. The fact that both these locations have been included into the 20mph scheme, appears to ignore the guidance and protocols set by CYC 20mph Steering Group (made up of Directors, senior Managers, Police representatives and elected members). Neither location can be supported by North Yorkshire Police.

**Broad Highway, Wheldrake** – Speed data was obtained for Broad Highway and indicates mean 21/22mph and 85<sup>th</sup>ile 29/31mph taken from a site just south of the Hall and a mean of 26/26mph and an 85<sup>th</sup>ile of 34/33mph recorded just north of the hall entrance. This indicates that an unsupported 20mph speed limit on this road would be likely to be problematic from inception as outlined in the report prepared by CYC Transport Planning Officer, Tom Horner. The implementation of a 20mph speed limit could lead to a dangerous mismatch between what vulnerable road users were expecting and what was being delivered by drivers. I therefore have serious road safety concerns should a 20mph speed limit be enacted without other mitigation.

It is the understanding of the North Yorkshire Police that all 20mph speed limits within City of York Council Unitary Authority area have been constructed to be compliant within the current law.

Provided that and it is an expectation of the North Yorkshire Police, a 20mph speed limit has been constructed correctly and in full consideration of and as per;

- i. Department for Transport Circular 01/2013 'Stetting Local Speed Limits',
- ii. Traffic Advisory Leaflet (TAL) 1/04 'Village Speed Limits,
- iii. TAL 9/99 '20mph Speed Limits and Zones',
- iv. Current ACPO Speed Enforcement Policy Guidelines (2011-2015: 'Joining Forces for Safer Roads'),
- v. Signed as per the statutory requirements contained within Regulation 16 of the Traffic Signs Regulations and General Directions 2002, and
- vi. Traffic Signs Manual Chapter 3 (Regulatory Signs).

then there should be no requirement for enforcement action by the police, as these types of speed limits should be driver compliant.

Where these limits have been proven to have compliance issues, such as those outlined, experience has shown that this is either due to an incorrect environment (20mph speed limits) or lack of effective engineering (20mph zones).

It is the responsibility of the local traffic authority (ie. City of York Council) and not the police to effectively manage the road network (under the Traffic Management Act 2004) and to ensure that speed limits are correctly installed.

Yours sincerely,

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