

DRAFT REVISED SPEED LIMIT POLICY COMMENTS

Ref.	Name	Comment	Response
1.	Individual resident, Donington	I would like to see some commitment to maintaining the county's roads to a fit standard for modern traffic. At the moment there is a reluctance to attach any blame for accidents on poorly maintained road surfaces, and instead focussing purely on speed as a major contributory factor.	<p>The County Council does have a Highways Asset Management Plan that sets out the County's policy in terms of highway maintenance. Over the last 2 to 3 years we have been successful in attracting additional funding from the Department for Transport and this has seen a general increase in the level of highway maintenance.</p> <p>All personal injury accidents within Lincolnshire are fully investigated to determine the cause or likely cause. If any of these causes are attributable to the condition of the infrastructure then additional and detailed assessments are carried out to determine what or if any further improvements are required.</p> <p>Speed is often a contributory factor to accidents and the Speed Limit Policy allows the Authority to recommend appropriate measures and put in place suitable levels of limit.</p>
2.	Individual resident, Stainfield, Lincoln	I have compared the draft policy to the Department for Transport Circular (01/2013) "Setting Local Speed Limits" which sets out the Government's vision for a <i>"transport system that is an engine for economic growth, but one that is also more sustainable, safe and improves quality of life in our communities"</i> ; my overriding point is that the Council's draft policy falls short in delivering this vision, specifically for Rural Speed Management, namely:	

1. Assessments: I am extremely concerned that the revisions to the Policy will result in villages and in particular rural settlements being endlessly discriminated against in any application for speed reduction due to no real change to the current inflexible and restrictive criteria by which applications are assessed. For example, for Stainfield, this is due to its physical layout, situated on an unclassified road, the lack of development units and the definition of what constitutes a 'village'.

Although the DfT Circular, section 7.3 VILLAGES, para 133 states a minimum criteria for the definition of what constitutes a village, for the purpose of applying a speed limit of 30mph; it goes on to Para 134 which states a position of flexibility should this criteria not be met and encourages local authorities to use their discretion: *"if there are just fewer than 20 houses, traffic authorities should make extra allowance for any other key buildings, such as a church, shop or school. Where the character of a village falls outside this definition, local authorities are encouraged to use their discretion in deciding whether a lower speed limit is appropriate."*

Para 139 also adds *"In situations where above criteria for a village are not met and there is a lesser degree of development, or where engineering measures are not practicable or cost-effective to achieve a 30mp limit, but a reduction from the national*

Due to the rural nature of Lincolnshire it is inevitable that there will be locations that fall short of the criteria within any Policy.

In the case of Stainfield it is unlikely that even under the DfT guidance that the density of development meets the criteria to allow it to be classed as a village.

The new Policy does have a borderline case section for both developed and rural locations; however even with these in place there will still be locations that will not meet the necessary criteria.

60mph speed limit is considered appropriate, traffic authorities should consider alternative lower limits of 40 or 50mph”.

The draft policy revisions do not appear to clearly state the Council’s application of discretion and allowances in the above circumstances or provision of alternatives.

2. Rural Villages/Urban Areas: The revisions to the Policy do not address the Government’s Policy for Rural Villages, in that rural villages should benefit from the same road safety as in urban areas. Section 7: Rural Speed Management, Key Points, it is stated *“It is government policy that a 30mph speed limit should be the norm in villages.”*

Section 3, UNDERLYING PRINCIPLES, para 30, outlines important factors when considering what is an appropriate speed limit, and goes on to state “While these factors need to be considered for all road types, they may be weighted differently in urban and rural areas. The impact on the community and environmental outcomes should also be considered.”

It is entirely beyond my comprehension that in this day and age, vehicles are permitted to travel at the national speed limit on a narrow rural road directly through a small rural village/settlement. It seems that the County Council’s 2008 Policy and proposed

The DfT guidance does state that to constitute a village there should be 20 or more houses and a minimum length of 600 metres. Where this figure is 'just fewer' than 20 houses extra allowance/consideration could be given and some discretion applied. In the case of Stainfield the number of houses falls well short of 20.

		<p>draft revisions will continue to ensure avoidance of approving applications for the implementation of speed reduction, due to the inflexible assessment process.</p> <p>3. <u>Residents' Concerns:</u> The draft revisions to the Council's policy do not address the Government's policy with regards to 'fear' of accidents occurring (through preventative measures). My fellow residents and I are extremely concerned by the speed of traffic and the increasing number of accident 'near misses' being witnessed.</p> <p>Section 7.3, para 131 states <i>"Fear of traffic can affect people's quality of life in villages and it is self-evident that villages should have comparable speed limits to similar roads in urban areas. It is therefore government policy that a 30mph speed limit should be the norm through villages"</i>.</p> <p>I also refer to Section 7, <i>"In 2011, 66% of road deaths in Britain occurred on rural roads, and 51% of road deaths occurred on single rural carriageway roads subject to the National speed Limit of 60mph"</i>, furthermore para 113 identifies <i>"Specifically, inappropriate speed is recorded as a contributory factor in 20% of crashes on minor rural roads with a 60mph limit."</i></p> <p>Again, this does not appear to be mentioned/reflected in the Council's draft revised Policy.</p>	<p>The new Policy does have a section for the consideration of speed limits in rural locations. This allows assessments to be carried out in relation to speed of traffic and accident rates and in terms of Stainfield this section would be used to consider whether any reduction in the speed limit is appropriate.</p>
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4. Road Geometry , Engineering, Community & Environmental Factors: The draft revised Policy still does not allow for weighted consideration of basic characteristics of rural roads and area, it appears to assess on road facing properties. This will exclude speed reduction in rural villages such as Stainfield unless revised. I again refer to the DfT Circular, section 7.2, para 123 *“Roads may have primarily either a through traffic function or a local access function. Both need to be provided safely”* and para 127 *“If walking, cycling, horse riding, community or environmental factors are particularly important on any road section, consideration should be given to using the lower limit”*. Nowhere do I see this adequately taken in to account in the Council’s draft revised policy.

The draft revised policy’s ‘Introduction’ states “This speed limit policy is based on the general national principles and the Department for Transport (DfT) guidelines but modified to reflect local conditions within our County. My feedback to this statement is although the policy has been adapted to ensure the introduction of a speed limit should take into account the nature of Lincolnshire’s rural road network, the balance of needs has not been entirely met. Considering the rurality of Lincolnshire, this draft revised policy has negated fair inclusion of the number of rural villages/settlements which have no adverse impact on economic accessibility yet would benefit greatly from speed reduction safety. Therefore the adapted policy is unfairly

The new Policy has greater flexibility than the DfT guidance in relation to overall length of speed limit (300m) and the fact that development units within Table 1 are weighted based on activity which could include environmental factors.

		<p>weighted.</p> <p>In conclusion, I propose amendment to Lincolnshire County Council's draft revised policy to clearly include statements lifted from the Department for Transport Circular (01/2013) "Setting Local Speed Limits", specifically Section 7: Rural Speed Management, 7.3 VILLAGES, paras 131 – 140. To clearly state that discretion will be applied to cases that just fall outside of criteria and consideration and weighting given to wider influential factors. Finally, inclusion of an appeals process to application decisions.</p>	<p>The new Policy does include situations where the criterion is not fully met within certain parameters and these are described as 'Borderline Cases'. In such circumstances further investigation is carried out and a paper is submitted to Planning and Regulation Committee for consideration and recommendation.</p> <p>The Planning and Regulation Committee is there to consider those locations that fall just outside the criterion and where objections are received as part of the democratic process.</p>
3.	Scothern Parish Council	Support policy	Noted
4.	Individual resident, Fulbeck	Look forward to revised policy being adopted as soon as possible	Noted
5.	Surfleet Parish Council	Support policy	Noted
6.	Moulton Parish Council	<p>Councillors are feeling quite apathetic towards LCC Highways at present due to the continued negativity. Nothing seems to match the current criteria, huge budget restraints are preventing little work to be carried out and there is the likelihood of many of our rural roads becoming unclassified.</p> <p>Agriculture and similar businesses are a vital part of our rural economy yet less and less is being done to safeguard its infrastructure and ultimately keep our roads safe.</p> <p>It was felt that Highways should be more proactive and ensure an accident doesn't happen</p>	<p>The new Policy will allow a speed limit</p>

		rather than wait for a fatal accident to happen before traffic calming measures are implemented and perhaps this should be given further consideration before the policy is finally adopted.	assessment to be carried out at Moulton under consistent criteria. This includes sites where there have been recorded injury accidents as well as requests for lower limits. Such measures are introduced following evidence of road safety issues rather than anticipating any future issues.
7.	Maltby Le Marsh Parish Council	<p>That consideration be given for a 'buffer zone' before changing from a high limit to a low limit. e.g. When changing from 60mph limit to a 30mph there be a lower speed between the two of say 40mph. This will act to slow driver before the restricted speed limit area.</p> <p>In paragraph 9.1.3 you say consultation will be held with the RAC, AA and British Drivers Association. Lincolnshire's roads are well used by motorcyclists and I feel that they should have a consultation voice in the procedure. The group Lincolnshire 'bikesafe' would be good to include in the speed limit policy consultation.</p> <p>Other than the above comments the draft policy is recommended.</p>	<p>The new Policy does allow for these situations as long as the criterion is met in terms of roadside development and mean speed results.</p> <p>The consultees listed represent all road users and therefore motor cyclists would be considered as part of their response as would cyclists, farmers, horse riders, etc.</p>
8.	Swaby Parish Council	<p>The Parish Council, as you may be aware, has been campaigning for many years to have the speed limit reduced on the stretch of A16 as it passes through Swaby, and also a limit introduced in Swaby village itself (off the A16). Parish Councillors hope that this new policy may have some bearing on the campaign and that there is policy in place to help reduce stretches of fast roads through villages without the need for deaths to occur first.</p>	<p>This new Policy does allow for rural locations to be assessed and Swaby was one of the trial locations visited by members of the Task and Finish Group.</p>
9.	Branston & Mere Parish	The Council has considered the Revised	Branston was one of the trial locations visited by

	Council	<p>Speed Limit Policy and was disappointed to see that the government guidelines would not be adopted.</p> <p>It was considered that the LCC rural speed policy was not 'about right' and does not meet the needs of communities divided by very busy roads, like the B1188. The government guidelines for 30 mph in rural communities should be adopted for communities like Branston, where vehicles are permitted to drive at 50 and 40mph beyond a Care Home, the Village Hall, the playground and several junctions.</p> <p>My Council would like to request that further consideration is given to a reduction in the speed limit on the B1188 Lincoln Road.</p>	<p>members of the Task and Finish Group and the B1188 will be re-assessed once the new Policy is in place.</p>
10.	Heydour Parish Council	<p>General layout</p> <p>It may be more logical to have the assessment process (section 3) after general guidelines. The assessment process can then be applied to the various development situations - Towns & Villages, Partial Development, etc. This removes the need for multiple mean speeds tables.</p> <p>Section 1. Speed limit assessments for town and villages</p> <p>1.2 It is not clear how many of these criteria must be achieved, e.g. on 'C' and Unclassified roads, are the criteria in 1.2.1 and 1.2.2 applied together or can 1.2.2 apply even if 1.2.1 does not? We believe this needs further clarification.</p>	<p>Section 3 relates to both sections 1 and 2 and therefore is in a logical order in terms of the assessment process.</p> <p>Sections 1.2.1 and 1.2.2 refer to different criteria and therefore both need to be achieved as part of the assessment process. One relates to density of development and the other the level of any likely speed limit.</p>

		<p>Sections 1 and 2 It would appear that within accepted "village" boundaries, Highways could consider the roads as being in both a town/village and partial development in terms of assessing speed limits. It should be made clear what breaks in character e.g. road junctions, trigger this change.</p> <p>Section 3.5 There is no explanation of the 5 levels of Road hierarchy. Could this be provided (in an annex) with a description/example/features of each, e.g. are LCC using the 5 levels as follows? 1 - Primary distributors, 2-District distributors, 3 - Local distributors, 4 - Access roads, 5 - Pedestrian streets?</p> <p>Section 5.1 Can the phrase "per 100 million vehicle kilometers" be explained further?</p> <p>Overall the document appears to primarily use vehicle speeds, the incidence of accidents and density of development to determine the appropriate speed limit. There is no reference to the differing needs and frequency of use by the road by vulnerable road users such as pedestrians (whether ramblers or locals), horse</p>	<p>Paragraph 2.1 identifies the differences required in terms of identifying what constitutes a town or village and what constitutes partial development.</p> <p>The road hierarchies detailed in the policy relate to those outlined in the County Council's Highways Asset Management Plan. These are used as part of the assessment process when determining development units and as part of the calculation made by officers.</p> <p>This is a calculation used as part of the assessment process by officers and is determined by a formula produced by the Department for Transport relating to the length of road and volume of traffic using it and the number of accidents that have occurred on that length over a 5 year period.</p> <p>Section has been sub-divided into road classification and therefore this will determine the differing needs and frequency of use by all road users.</p> <p>The assessment process for determining the level of speed limit refers to motorised traffic</p>
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<p>11.</p>	<p>Colsterworth and District Parish Council</p>	<p>The points below highlight how "Lincolnshire Speed Limit Policy - Draft 2015 is specifically designed or worded to maintain the status quo in Lincolnshire and so if adopted will fail to implement the government policy guidance in particular in relation to village speed limits.</p>	

		<p>LCC consultation from Colsterworth and District Parish Council refers to two main documents.</p> <p>A) Lincolnshire Speed Limit Policy - Draft 2015 B) Government policy Guidance Department of Transport - Setting Local Speed Limits 2013</p> <p>1. Section 7 of the government policy guidance "key points" quite clearly states village speed limits should be 30mph the draft document makes no mention of this.</p> <p>2. Why has the amount of development on a road to qualify for a speed limit been "INCREASED" from 20 to 24. Most county councils had dropped the number so as to include more areas for 30mph e.g. Essex which is 11! (LCC Speed Limit Assessments For Towns and Villages point 1.2.1) (Government guidance section 7 quite clearly says 20 or less para 133 and 134.)</p> <p>3. The weightings for public or community buildings and play areas should be higher, but the weighting table has already been offset by the increased developments required from 20 to 24 as above. (LCC draught doc Development units Table 1 page 39.)</p>	<p>The draft policy is based on the general principles outlined in the Department for Transport's guidelines. However it is modified to reflect the local conditions within Lincolnshire.</p> <p>Section 3.7 of the policy sets out the process to determine the appropriate level of any speed limit. This includes the assessment of village speed limits.</p> <p>The DtT guidance states that a minimum of 20 properties are required to qualify for a speed limit. Lincolnshire's draft policy has a requirement for a minimum of 24 units and these are weighted according to the type and level of activity of each unit in accordance with Table 1 in paragraph 3.5. Therefore there may be situations where the number of properties could be less than 20 thereby making Lincolnshire's policy more flexible.</p> <p>This is not the case as explained above.</p>
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		<p>prevent this even though it was quite obviously the government's intention so again goes against the spirit of the policy guidance.</p> <p>Post Lane, North Witham, Grantham (one of our villages) is a good example of the above and how the document has been designed to maintain the status quo and NOT improve conditions for communities.</p> <p>6. There is no mention of quality of life issues such as perceived danger altering behaviour. Fear of traffic can affect people's quality of life in villages and it is self-evident that villages should have comparable speed limits to similar roads in urban areas. It is therefore government policy that a 30 mph speed limit should be the norm through villages. (Government policy guidance 7.3 Villages para 131.)</p> <p>7. There is no mention of environmental noise.</p> <p>8. There is no mention of consultation or communication with local communities whose opinion should also be given weighting, example of which are petitions and campaigns.</p>	<p>This is covered in paragraphs 1.2.1 to 1.2.5 as previously explained.</p> <p>Noise related issues would exist regardless of the level of limit to a certain degree and to have a set criterion for this particular issue would be onerous and could be subject to varied interpretation.</p> <p>Any request would generally be generated from a Parish/District Council or local communities and officers have the opportunity to discuss further before taking forward a proposal. As part of the process to introduce a limit consultations and public advertisements are undertaken as outlined in Section 9.</p>
12.	Saltfleetby Parish Council	No village of any size should have a split in the	Sections 1.2.1 and 1.2.2 refer to different criteria

		<p>speed limit but unfortunately Saltfleetby has exactly that and the Council submitted a formal request to Highways on the 23rd June 2013 for the 40mph speed limit to be extended to the end of the B1200 where it meets the A1031, in order to correct this and give the residents that reside at this end of the village the same protection offered by the lower 40mph limit as the rest. The Council would also stress that it should be noted that at this end of Saltfleetby there is no footpath which makes it even more important that the speed limit should be lower, i.e. 40mph as opposed to the current 60mph.</p> <p>The Council is greatly concerned that the current criteria for assessing road speeds has prevented a reduction of the speed limit on this section of the B1200 Main Road in Saltfleetby St Clements. The bizarre result is that a section of our village has a much higher speed limit than the rest – something that has resulted in several residents' complaints.</p> <p>The Council asks that this anomaly be addressed in any new Lincolnshire Speed Limit Policy current under revision.</p>	<p>and therefore both need to be achieved as part of the assessment process. One relates to density of development and the other the level of any likely speed limit.</p> <p>The draft policy now includes further relaxation with regards to development density and mean speeds. Sections 4 and 6 outline these Borderline Cases.</p>
13.	Huttoft Parish Council	Support policy	Noted