



Speed Limits

Decision Notice



Committee for the
Environment & Infrastructure

Introduction

This report comprises three sections which serve three separate purposes. Part One sets out the Committee for the Environment and Infrastructure's principles for setting speed limits which is based on the safe system approach.

Part Two then acknowledges the public's responses to the Committee's proposed speed limit reductions together with the Committee's consideration of the issues that have been raised. Part Three summarises the Committee's final decisions on the proposed speed limit changes.

Executive Summary

Improving road safety is one of the top priorities among the various work streams identified following States approval of the Integrated Transport Strategy in 2014. A review of speed limits features prominently under this work stream and priority is being given to reviewing speeds around schools and in built-up areas. This, in turn, will address some of the concerns highlighted by respondents during the 2014 Strategy consultation process as to why they don't currently walk or cycle.

Speed limits around schools have previously been addressed on a couple of occasions in the last 15 years: this has resulted in permanent 25mph speed limits being introduced around all Island schools, with the exception of St. Sampson's High School, which is 20mph, and Blanchelande College, which has been added in these latest proposals. The Committee will give further consideration to speed limits around schools in Phase 2, including the possibility of introducing part-time reduced speed limits.

The requirement to introduce or extend 25mph speed limits in built-up areas which are recognised as community focal points where there is a higher concentration of residential properties, schools and amenities, was recognised in the 1950s or early 1960s when reduced 25mph speed limits were introduced in St. Peter Port, St. Sampson and St. Martin. This theme was extended to what were then described as "Parish Centres", namely Cobo and subsequently St. Peter's.

These latest proposals extend the above principle to the remaining parts of the Island where the risk of conflict between vehicles and people on foot is at its greatest. Most of these areas, now identified as Local and Main Centres within the Island Development Plan, already have reduced speed limits in place, at least in part, but others such as L'Islet do not.

The Committee's approach to reviewing speed limits is very much aligned on the 'safe system approach' which is based on the principle that our life and health should not be compromised by our need to travel and that no level of death or serious injury on our road transport network is acceptable. This holistic view on road transport systems and the interaction between all road users acknowledges that people will make mistakes and focuses on the impacts that collisions can have on the human body. Speed management is therefore a central part of the safe system approach.

Having consulted with the public it is clear that people living in the Local and Main Centres areas value the safety orientated nature of these proposals and recognise the benefits that it will bring to their communities. A number of themes were generated in the responses and the Committee has sought to clarify its position and to dispel concerns over a number of perceived dis-benefits associated with the introduction of reduced speed limits, such as increases in pollution, increased congestion and other perceived unintended consequences of reducing speed limits.

On the basis of the evidence submitted in this report the Committee firmly believes that the benefits of introducing further 25mph speed limits in Local Centres and the Main Centre Outer Areas far outweigh any perceived dis-benefits and, accordingly, has decided to implement reduced 25mph speed limits in all of the roads previously detailed in the consultation document.

Other suggestions were received during the consultation for extending some of the proposed reduced speed limits to adjoining roads, or indeed roads elsewhere. The Committee will take all of these suggestions into consideration during Phase 2 of the process, which is a broader initiative to review speed limits across the island.

Part One

The Committee's approach to assessing speed limits

The safe system approach

The safe system approach, which is endorsed as best practice by the OECD and the World Health Organisation among many other organisations, is based on the principle that our life and health should not be compromised by the need to travel, and that death or serious injury on our road transport network is never acceptable. It is a holistic view of the road transport system and the interactions between road users, roads and roadsides, vehicles and travel speeds. It is a robustly evidence-based approach that uses data, research and evaluation to substantiate its recommendations.

At the core of the safe system approach is the understanding that people will always make mistakes – so the transport system must take that into account and be forgiving of those mistakes. The human body can only withstand a certain level of force before it results in injury, so a safe system must ensure that the forces in collisions do not exceed the limits of our physical tolerance.

Speed management is one of the central tenets of the safe system approach, as speed has a direct relationship with collision forces.

The Integrated Transport Strategy

The Integrated Transport Strategy¹, which was approved by the States of Deliberation in 2014, aims to “facilitate safe, convenient, accessible and affordable travel options for all the community, which are time and energy efficient, enhance health and the environment and minimise pollution.”

It specifically aims to increase the number of people walking, cycling and taking the bus, “principally by making [these] alternatives significantly easier and more attractive than at present.”

The States also resolved to adopt the Transport Hierarchy, which prioritises walking and cycling above all other forms of transport.

In identifying the current barriers to walking and cycling locally, the Strategy explains that “The strong message from the consultations is that one of the main reasons people do not walk or cycle is because they fear being hit by a motor vehicle. This must be addressed.”

¹ <https://www.gov.gg/CHttpHandler.ashx?id=86937&p=0> (from page 714)

The Island Development Plan

The Island Development Plan identified the boundaries of seven Local Centres and two Main Centre Outer Areas, defined by the concentration of services, shops and community facilities available within them.

A characteristic of the Local Centres is that they have a main road running through them. In most Centres a selection of the roads within the new boundaries had a 25mph speed limit, imposed in the past to make them safer for pedestrians, cyclists and vehicles emerging onto the main road. If as intended development outside the Main Centres takes place predominantly in the Local Centres their roads will become only more heavily used by all.

The Committee for the Environment & Infrastructure took the decision to investigate extending or introducing 25mph speed limits within the Local Centres and the Main Centre Outer Areas in order to make them more consistent

Speed Matters

It is internationally recognised that the single most important contributor to road fatalities is poor speed selection, commonly interpreted as the use of inappropriate vehicle speeds, or speeding².

There is now a large field of research from around the world that clearly demonstrates the relationship between speed and risk^{3,4}. There is a consistent finding from the research that greater speed increases collision, injury and fatality rates and that decreasing speed reduces these rates; in other words, the greater the speed, the greater the likely frequency of collisions and the greater the severity of resulting injuries.

Higher speeds increase the risk of a collision for a number of reasons. Most importantly, a vehicle travelling at a higher speed covers a greater distance before it can come to a stop. This is partly because more ground is covered in the time needed to react (the thinking time), and partly because the process of deceleration (the braking time) itself takes longer, during which time the vehicle covers more ground at a higher speed.

² Speed management – A road safety manual for decision makers and practitioners WHO, FIA Foundation for the Automobile and Society, World Bank 2008

³ Taylor MC et al The effects of drivers' speeds on the frequency of road accidents, Crowthorne UK Transport Research Laboratory Report no 421 2000

⁴ Aarts R Vaa T The handbook of safety measures, Amsterdam, Elsevier 2006

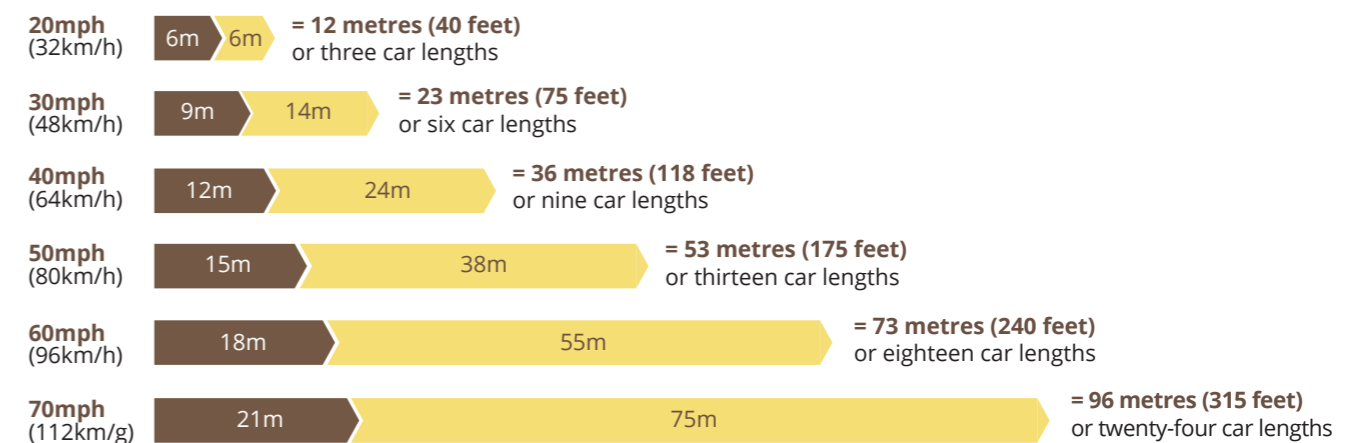
The higher the speed, the more likely it is that a driver will lose control of a vehicle and fail to anticipate oncoming hazards in good time.

Similarly, it is harder for other road users to judge higher speeds. It has been shown that children, for example, cannot accurately gauge speeds of vehicles approaching them at more than 20mph, and that people of all ages, whether on foot or in or on other vehicles, tend to underestimate speeds greater than 20mph, and are therefore more likely to make more risky judgements⁵.

The figure below shows driver reaction distances and braking distances in metres to illustrate the relative differences in total emergency stopping distances at different vehicle speeds.

Figure 1 Illustration of the stopping distance in an emergency braking scenario⁶

Typical Stopping Distances



Thinking Distance
Braking Distance

Average car length = 4 metres (13 feet)

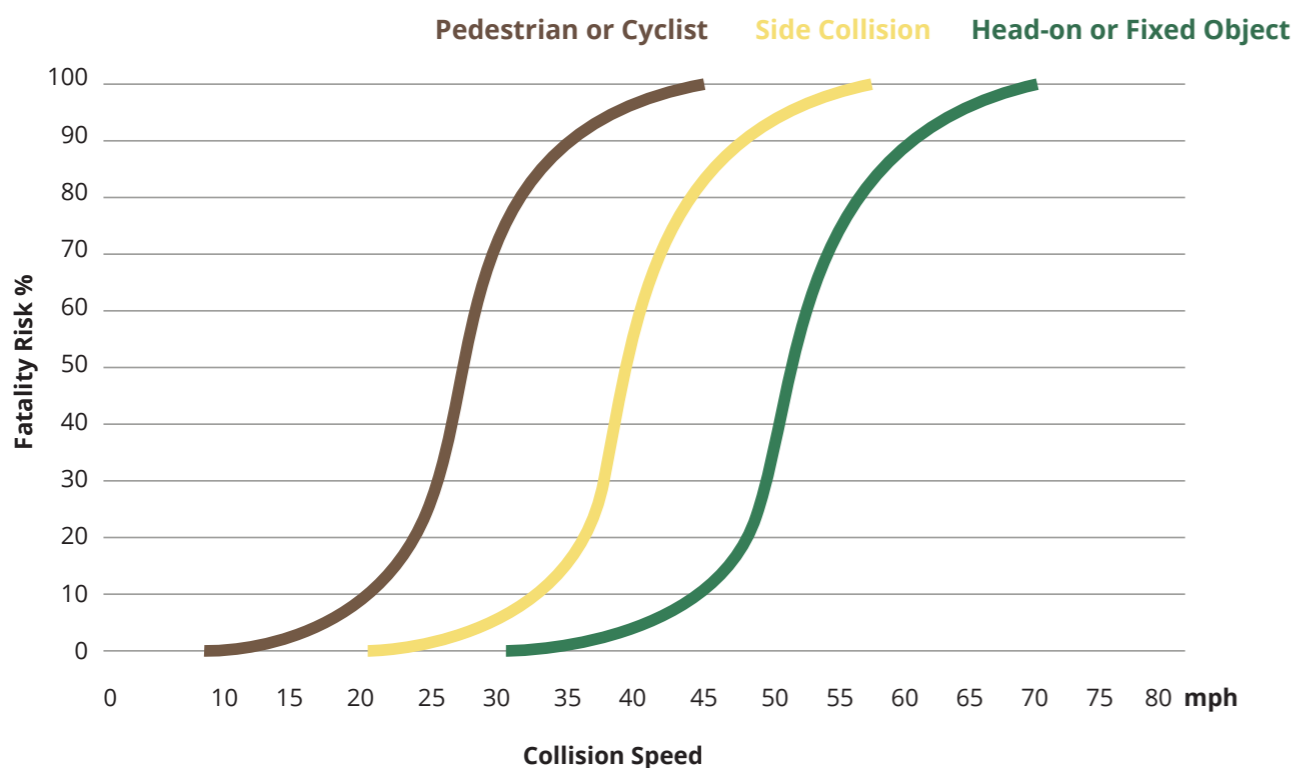
The distances shown are a general guide. The distance will depend on your attention (thinking distance), the road surface, the weather conditions and the condition of your vehicle at the time

Speed also has an effect on the kinetic energy of a collision, which directly affects the likely severity of human injury. This relationship is exponential rather than linear – in other words, small increases in speed create a disproportionately larger force on impact. The relationship between fatality risk and vehicle speed for pedestrians and cyclists (in brown) and vehicle occupants in side-on collisions (in yellow) or head-on collisions (in green) is summarised in Figure 2 below.

⁵ Reduced Sensitivity to Visual Looming Inflates the Risk Posed by Speeding Vehicles When Children Try to Cross the Road. / Wann, John P.; Poulter, Damian R.; Purcell, Catherine. In: Psychological Science, Vol 22, No. 4, 04.2011, p. 429-434.

⁶ WHO et al 2008 Op cit

Figure 2 Relationship between Fatality Risk & Vehicle Speed for Pedestrians, Cyclists and Motorists⁷



An effective approach to speed management

The industry manual Speed Management⁸ describes an appropriate speed, in the context of a safe system, as the speed level that considers people’s safety as the main goal, taking into account mobility and prevailing conditions such as roadside development, the mix of users along the road, the frequency of access to the road, the volume and mix of traffic, environmental concerns and the quality of life for residents living along the road.

How are speed limits set?

Speed limits provide a basic indicator to road users of the maximum speed allowed under the law. Speed limits have evolved over time as societies have set different priorities for their road system.

⁷ Wramborg 2005

⁸ Speed management – A road safety manual for decision makers and practitioners WHO, FIA Foundation for the Automobile and Society, World Bank 2008

In the 1960s, limits were set using the 85th percentile speed, reflecting the view that drivers were making rational decisions about road speed and only the minority (the remaining 15%) would be considered as speeding.

From the late 1990s onwards, however, governments began to prioritise road users’ safety over factors that had traditionally dominated the process, such as driver attitudes and their personal preferences for high speed travel. This led to the development of the safe system model, which is known in different jurisdictions by different names, including Vision Zero and Sustainable Safety. It is now widespread and successful internationally.

What is clear is that the 85th percentile approach is no longer appropriate: it has no basis in objective safety criteria. Society cannot rely on the assumption that all drivers are making rational decisions all of the time. Most drivers consider themselves above average in terms of skill. A number of surveys⁹ have shown that up to 90% of drivers think they are an above average, low risk driver. As a result they think that they can travel above the speed limit and not place themselves or others at risk.

Guernsey’s Integrated Transport Strategy puts road safety as its primary objective, which means the 85th percentile should no longer be considered a central criterion in the setting of speed limits. The safe system approach is the more appropriate model and as such is used by the Committee to assess and set speed limits in the island.

The Committee’s Consultation

On the 16th July 2018 the Committee launched a consultation on its proposals to introduce or extend 25mph speed limits to broadly cover all Local Centres and Main Centre Outer Areas, as identified in the Island Development Plan. The significant majority of roads in these centres were already limited to 25mph, but there were some areas, roads or sections of road where this existing policy had not been consistently applied. The proposals therefore aimed to apply greater consistency to what has been a longstanding policy of lower speed limits in busy community areas.

These areas are recognised as community focal points where there is a higher concentration of residential properties, schools or amenities. However, a number of adjustments were made to the proposals in recognition of the fact that road geometry and design varies within and around these designated areas. Accordingly, the proposals were expanded to some roads beyond the boundaries of the Local Centres where this was only sensible, such as Le Friquet, Rue de la Perruque and Ruelle de la Croix (Castel) and Sandy Hook (St. Sampson).

⁹ SATRE 3 Report European drivers and road risk: report on principal results France Institut de Recherche sur les Transport et leur Securite, INRETS 2004

By aligning the inconsistently high speed limits to the lower speed of 25mph in keeping with existing policy in these more densely populated areas, the Committee aimed to make the roads safer for vulnerable road users and encourage more people to walk and cycle, especially when undertaking shorter journeys in and around these community hubs. These interventions are also designed to improve health, enhance the environment and minimise pollution, which are in accordance with the objectives with the vision for travel on the island as set out in the Integrated Transport Strategy.

This exercise constituted Phase 1 of the Committee's planned wider review of existing speed limits. It is the Committee's intention to review speed limits across the island, so that the public can be reassured that the road in which they live or drive along regularly will also be considered in the future. However, that is a much larger piece of work that once complete will require a policy letter to be submitted to the States for consideration. Before that more complex piece of work takes place the Committee decided to consult on these initial proposals as Phase 1.

Plans showing the proposed changes were made available on the States of Guernsey website (www.gov.gg/yourviews) and at displays located at Sir Charles Frossard House, Edward T Wheadon House, Beau Sejour and the Traffic and Highway Services offices in Bulwer Avenue.

Members of the public were invited to comment on Phase 1 of the proposed speed limit changes and the consultation closed on the 13th August 2018.

It is worth noting that Phase 2, a wider review, has history to as far back as 2006 when the States resolved to commission a strategic review of the island's speed limits. Following this, much work was carried out by former Environment Departments but widespread changes were never brought in. The 2014 Integrated Transport Strategy highlighted the importance of reduced speed limits and the work stream was once again progressed. One of the key elements of the wider review would be to address the current set up whereby smaller lanes (often single lane carriageways), which are not located by a school or are not within local or main centres, fall within the maximum island-wide speed limit of 35mph.

Part Two

The Responses to the Consultation

The Responses to the Consultation

At the end of the consultation period, the Committee had received a total of 301 responses. 290 responses were from individuals and 11 responses were from organisations. 136 (45%) indicated that they supported the proposals.

A selection of extract quotes from those in support of the proposals are listed below:-

'I am writing to express my delight at these plans. I gave up my car around four years ago for a bicycle, as I wanted to improve my physical and mental health, and also to reduce my environmental impact. I have benefited greatly from making this change and it is such a joy to see so many other people enthusiastic about protecting our beautiful island and adopting a healthier attitude to life'.

'I completely agree with the proposals to reduce speed limits in certain areas to 25mph given the growing size and number of vehicles on the road. I've often had to take quick action to make sure trucks and speeding cars see me walking with a push chair, but often results in the road being scattered with broken wing mirrors'.

'I fully support these proposals as any move to make the roads safer for all users and pedestrians alike is positive'.

'As someone who has to drive trucks as part of my living I would suggest that I think it would be beneficial any staff or committee members who need persuading come out in my or anyone else's truck to experience what it's like to face someone coming too fast round a corner or cutting a corner, going to wide and forcing you to take evasive action which could end up being a pedestrians' life'.

'I am very worried when cycling and would cycle far more often if I felt safer. There is no pleasure at all in cycling on Guernsey. Even Ruelle Tranquille roads are unpleasant with motorists speeding'.

'As a driver, cyclist and pedestrian I fully support the proposals to lower the speed limits. It is often uncomfortable/intimidating being a pedestrian due to the speed and size of vehicles passing close by even when there are narrow pavements'.

'We would welcome a drop in speed in our road as it is like a race track. Good thinking many thanks'.

'I think the proposed speed limit reductions are, in general, an excellent idea. Too many motorists speed through the lanes and narrow roads often using them as 'rat runs' endangering the safety of pedestrians, cyclists, horse riders and other motorists as well as disturbing the peace of the more 'countrified' areas of the island'.

'As a regular bike rider, I am in full support of your proposal to change the speed limit in the identified areas. I strongly feel that it will help pedestrians and cyclists feel more comfortable travelling on these roads. I have observed the difference in the behaviours of drivers in areas of different speed limits often as I cycle and it is notable that, in areas of a lower speed limit, decisions are better thought through and drivers are much more respectful of cyclists and pedestrians'.

165 (55%) responses were objections to the proposals.

A selection of extract quotes from those against the proposals are listed below:-

'Stop being such a nanny state, speed limits around schools should also be lifted to 35 when the schools are on long holidays, it's bad enough driving this island anyway without dropping the speed limit to 25 on major roads.'

'I write to oppose the environment committees proposal to further lower speed limits around the island. As both a motorist and a cyclist with children (including at Blanchelande) I see no good reason to lower the speed limits and disrupt traffic flow for those of us who live outside Town. Talk of environmental benefits strikes me as a bit of a nonsense. My car runs much better at 35 mph than 25 Mph.'

'Hi I'm a very annoyed motorist as this new speed limit proposal seems to me another revenue stream, the speed limits have been the same for a long time and I'm fed up of this island squeezing every last penny. I would like to know how much money you hope to make from this.'

'This is absolutely ridiculous, what other utter rubbish can be thought up to make our island an even worse place?? Are we all getting a horse and cart soon too?? All road users should be aware and courteous of each other. The only places that should be 25 are the ones that already are/school areas. Stop changing things and leave our island alone!!!'

'No thank you to a blanket reduction in speed limits. In my opinion this will not aid the free flow of traffic (obviously because it is going slower), will not result in less pollution (due to engine inefficiency), will not automatically reduce accidents and certainly will not encourage people to cycle or walk. It would be interesting to see the evidence for these assertions as advertised in the Local Media. Please don't ask me to go and find evidence that no doubt similar respondents have already sent you to the contrary, there is plenty out there, you go and look!'

'There is no point in introducing more 25 mph speed limits as the people who drive carefully already use an appropriate speed and those who ignore current 25 mph limits will ignore the new ones as well. Policing locations such as Les Baissieres or

Route de Carteret and imposing fines might make a substantial difference to the Island's economy.'

'As a professional driver for over 50 years it will mean longer journeys for everyone with more congestion and pollution. Buses, Taxis and delivery vehicles will be out longer with the congestion holding thing up and if more bikes are on the road again even longer delays with extra cost for taxis, deliveries and a bigger subsidy for buses with more pollution from them. In my opinion driving slower will cause more frustration and result in more accidents. As most of the lanes and main roads most ordinary road users cannot get up to 25 let alone 35mph, why waste money on all the signs and change?'

'I do not think it is necessary to change the speed limits on roads on the plan which appeared in the Guernsey Press. In small roads it is pretty much impossible to exceed the limits and on the larger roads there is usually too much traffic. I think there are far more urgent problems that the states should be dealing with.'

'Regarding proposed lowering of speed limits. If anything on some roads the limits should be raised, the cost to busy people like myself will not only be monetary but also a slow but sure build up of frustration, in some people that frustration will manifest itself in road rage.'

The topics of concern which generated the most discussion are shown in the table below. In some instances there were specific objections to certain roads being included within the 25mph zones.

Reason for objection	No of Respondents ¹⁰
No evidence base	67
Increase in pollution	44
Cost/level of implementation & infrastructure requirements	46
Unintended adverse consequences on road safety	32
Increase in congestion	20
Increase in journey times	27
Enforce existing limits better	17
Critical of blanket approach	17

These topics shown above which elicited the greatest number of responses are considered in detail below.

¹⁰ Many respondents raised multiple reasons for objecting to the proposals.

No evidence base

Criticism for the lack of data and the provision of evidence was raised in 67 objections to the proposed reduction in speed limits. These respondents were frustrated that there was no empirical evidence or research provided in the consultation document to justify the changes. A common comment was that the Committee was seeking to make the roads in question safer for vulnerable road users and encourage more people to walk and cycle, but were providing no supporting documentation that reduced speed limits would achieve this aim.

While the Committee understands the frustration of some that the evidence wasn't explicitly referred to in the consultation document, the most relevant evidence is the huge body of empirical data, research and analysis that has informed the safe system approach, some of which is set out earlier in this Decision Notice.

As well evidenced by research, for example, a person hit by a vehicle being driven at 25mph has an 80% chance of survival, whereas a person hit by a vehicle being driven at 35mph has a 90% chance of dying. A 10mph reduction in speed therefore increases the chances of survival by over 70%.

We also have clear local precedents supporting the policy of lower speed limits in busy community areas. At some time around the 1950's or early 1960's, the Police Committee rationalised the speed limits. This included a speed limit of 25mph being set for the three "urban" areas of St Peter Port, St Sampson's and St Martin's. Since then the 25mph limit has been introduced in some other parish centres, including Cobo and St. Peter's primarily to make the main roads running through them safer. There was therefore no need to gather further evidence in order to decide to extend the same speed limit policy to other Local Centres, because they share many similar characteristics. This same principle was then also applied to the St. Sampson / Vale Main Centre Outer Area. The Island Development Plan contains extensive research and consultation around the Main Centres and Local Centres where sustainable communities are being encouraged¹¹. A more consistent, well-managed 25mph limit would lead to greater safety for those not afforded the protection of a motor vehicle.

More importantly, however, there is a substantial body of research that shows that the perceived risk of walking and cycling is far more relevant to people's transport choices than the actual risk. Even when actual risk (i.e. the number of collisions, deaths or injuries) is very low, the perceived risk can still be high, resulting in a significant percentage of people that would otherwise be tempted to walk or cycle choosing not to do so. Vehicle speed is a key factor in would-be walkers' or cyclists' perception of risk. . Police collision statistics therefore do not tell the whole story as they are a measure of actual rather than perceived risk.

¹¹ <https://gov.gg/CHttpHandler.ashx?id=97042&p=0>

As well as explaining some of the extensive research and evidence that underpins the proposals, the Committee believes it would be helpful to explain its views on the purpose of the consultation. Guernsey's residents know how the built environment makes them feel and how they would like to feel. Guernsey's residents are the experts in knowing how our infrastructure and traffic speeds impact on their daily lives. This was the purpose of the speed limit review consultation – to give the Guernsey public an opportunity to offer their views on whether the proposed reduction in speed limits would positively or negatively impact on their lives.

Responses to the consultation were provided by people with a range of different perspectives, for example people who were responding primarily as those travelling through an area compared with people who live in the vicinity of the roads in question. For this latter group the Committee noted the support for the proposals and the impact that the changes would have on their quality of life.

Increase in pollution

The issue of increased pollution was raised in 44 objections. The respondents believed that the proposed reduction in speed limits would see an increase in emissions due to less efficient use of vehicle engines. (Increased congestion was also cited as a cause of higher emissions and this is covered as a separate issue below.) The main argument put forward is that vehicles' engines will be less efficient when travelling at 35mph compared to 25mph and that journey times will be longer.

Air pollution is a major public health risk, ranking alongside cancer, heart disease and obesity. The most recent policy paper¹² published by the UK government on the topic advises people to reduce their exposure to air pollution first and foremost by using a car less often and walking and cycling more. This is because motorised transport generates significant quantities of these harmful air pollutants, whereas walking and cycling does not. Creating a road environment more conducive to walking and cycling is therefore the single most effective way to reduce traffic-derived air pollution, and reducing vehicle speeds is an important factor in achieving this.

The idea that lower vehicle speeds generate more pollutants, however, is a common misconception, as in real-world scenarios there are a great many interdependent factors that influence vehicle emissions more than cruising speed, including congestion, driving style (for example braking and acceleration rates), engine and fuel types, engine load, ambient air temperature and road gradient.

¹² <https://www.gov.uk/government/publications/air-quality-explaining-air-pollution/air-quality-explaining-air-pollution-at-a-glance#walking-and-cycling>

Detailed air pollution data collated locally show that it is not low vehicle speeds that cause the biggest spikes in pollutants but rather congestion. Spikes in air pollutants can be seen where motorised traffic is at a standstill, rather than where it is simply moving slowly.

Although in test conditions engines are most efficient at around 55mph-60mph, real-world research shows that 20mph zones have no net negative effect on emissions. Cruising speeds (which the test-environment research relates to) are in any case largely irrelevant in the Local Centres and Main Centre Outer Areas, as junctions (featuring traffic lights, filters and yellow lines, for example), crossings and greater volumes of traffic mean that vehicles rarely have the opportunity to cruise at any constant speed.

In fact, research shows that in these kinds of built up areas, lower speed limits tend to ensure that vehicles move more smoothly, generating fewer pollutants because they brake and accelerate less.

A recent Transport for London publication¹³ exploring the relationship between speed, emissions and health discredits the persistent urban myth that lower speed limits increase pollution. It summarises that “the health benefits of slowing traffic [...] will dwarf any dis-benefits.”

Cost/level of implementation & infrastructure requirements

The cost of the proposed amendments and the associated road infrastructure requirements was raised by 46 respondents. Respondents wished to know the overall cost of the proposals and believed that the limited financial resources could be better spent elsewhere.

The major cost of the project is in signage and road markings. However, the cost of signage will be minimal as many of the existing signs are being moved and reused. Also, the zone approach allows for signage on the entry points to the centres and therefore does not necessitate adding extra street clutter along the roads. The benefits of speed limit reductions, which play an important role in encouraging a safer community environment where short journeys can be undertaken by foot or bicycle, shows they are a cost-effective investment. In comparison to the cost of making large infrastructure changes, the proposals are good value for money.

¹³ Speed, Emissions & Health – The impact of vehicle speeds on emissions & health: an evidence summary, TfL, June 2018. <http://content.tfl.gov.uk/speed-emissions-and-heth.pdf>

Unintended adverse consequences on road safety

32 comments were raised by respondents to the consultation who believed that the proposed speed limit reductions would actually have an adverse impact on road safety contrary to the Committee's stated objectives. Arguments put forward included the frustration drivers would experience due to being unable to overtake cyclists which would prompt more dangerous driving and drivers would concentrate more on their speedometers and look at the road less with 25 mph limits compared with 35 mph. There are currently 331 roads with a 25mph speed limit in place and there is no evidence to suggest that drivers behave in this way in those areas.

The evidence does show conclusively that driving more slowly can prevent injuries and save lives. The UK's Transport Research Laboratory has published reports which show that every 1mph reduction in average urban speeds can result in a 6% fall in the number in casualties.

Some respondents commented on UK national media coverage of a report on speed reduction schemes implemented in Bath & NE Somerset Council that alleged that road safety did not improve after introduction of the 20 mph schemes. The report was found to be compromised by flawed methodology, selective inclusions and omissions, misrepresentation of data, the perception of bias, and the failure to comply with local authority ethical standards and Department of Transport guidance¹⁴.

In fact, the introduction of 20mph speed limits in Bath and Bristol have resulted in significantly reduced collisions and casualties – for example a 28% reduction in collisions and a 23% reduction in casualties within the 20mph limits in Bath. This is in line with data trends from similar schemes in other parts of the country such as Warrington, which also reported a 25% reduction in casualties after the implementation of a 20mph limit.

The Committee notes that the successful outcomes of the reduced speed limits in Bath and Bristol mirror those achieved elsewhere, adding to the ample evidence base that shows how even small reductions in speed can have a major positive impact on road safety.

¹⁴ <http://www.20splenty.org/banes-report>, <https://medium.com/@lewisspurgin/20mph-zones-are-not-causing-more-deaths-37d41e30e297>, <https://www.rospa.com/rospaweb/docs/advice-services/road-safety/drivers/20-mph-zone-factsheet.pdf>

Increase in congestion

20 respondents to the consultation believed that the proposed speed limit reductions would increase congestion.

Traffic congestion is when there are more vehicles than the road capacity can handle, which makes journey times longer and increases queueing. By far the most significant factor in delays is junction capacity. Therefore, unlike travelling for long distances between junctions such as in the UK or Europe, in Guernsey (where road lengths between junctions are very short) traffic speed is not likely to have any significant effect on congestion at all.

Increase in journey times

The fear of increased journey times resulting from reduced speed limits was raised 27 times. Objectors argued that the lower speed limits would have a significant impact on vehicle journey times with a subsequent effect on local businesses, including taxis. This assumption is not supported by evidence, however: various studies show that slower speeds are largely mitigated by reduced distances between vehicles as the braking distance required also decreases¹⁵.

In Guernsey, because the distance between junctions is very short in comparison to the UK or Europe, journey times are more dependent on how long it takes to negotiate a controlled junction (ie a stop line, filter or traffic signals), rather than the speed limit within the road. The delay on journey times is therefore negligible. For example, a journey driven at the current speed limit of 35mph on the relevant section of Braye Road would only take 13 seconds longer if driven at 25mph.

Following the introduction of the 25mph speed limits around the island's schools, Traffic & Highway Services did not record any complaints regarding the increase in journey times because of the reduction by 10mph.

Enforce existing speed limits better

17 responses to the consultation suggested that improvements to road safety would be better achieved by enforcing existing speed limits better instead of reducing the speed limits further. In its press release the Committee for Home Affairs endorsed the Police's approach of focusing on excessive speeding .

¹⁵ <http://www.trafikdage.dk/td/papers/papers04/Trafikdage-2004-339.pdf>

¹⁶ <https://gov.gg/article/166895/Committee-for-Home-Affairs-submits-views-to-EI-on-speed-limit-consultation>

Research shows that speeding (driving at a speed above the speed limit) is the single largest behavioural contributor to road traffic deaths and injuries in the developed world. Speeding is recognised as a major problem worldwide by the Organisation for Economic Co-operation and Development (OECD)¹⁷ and the World Health Organisation¹⁸,¹⁹. The Committee acknowledges that the management of speed is critical to the success of the safe systems approach. International research shows that low level speeding (within 10km/h – i.e. 6.2mph) of the speed limit is a major contributor to death and injury. However, speeding, especially low level speeding, remains socially acceptable and is commonly practiced by drivers around the world²⁰ and is often tolerated and not enforced by law enforcement authorities. This approach compounds the social acceptability of low level speeding and reinforces the message that small speed increments above the limit is not an issue, when in fact it's a far bigger part of the overall problem than extreme speeds.

The Committee intends to work with Home Affairs and the Police to improve road safety for all islanders. The Committee has meetings scheduled in the coming weeks to work collaboratively with Home Affairs and the Police in this important area.

Whilst the Committee did consult with the Police prior to its proposals being made public, it did not consult with the Committee for Home Affairs as the proposals did not constitute a change in policy – merely the extension of 25mph zones in some built up areas where the existing policy was not already applied.

Critical of blanket approach

The proposed speed limit reductions were opposed by 17 respondents on the basis the Committee was proposing a blanket speed limit reduction without any consideration of the context for each road.

The proposals simply make the speed limits around our schools and in the island's Main and Local Centres more consistent, in line with the existing, long-established speed limits policy of lower limits in busy community areas. This policy was first established in the 1950s and 1960s when urban streets in St. Peter Port, St Sampson and St Martin's were made 25mph. The proposals encompass the areas that have been identified as those with the greatest concentrations of services and facilities accessed regularly by islanders.

¹⁷ Speed Management. Report of the Transport Research Centre, OECD, 2006

¹⁸ Howard E Mooren, L Nilsson, G Quimby, A Vadeby Speed Management: A Road Safety Manual for decision makers and practioners WHO/ GRSP 2008

¹⁹ Global Plan for the Decade of Action for Road Safety 2011-20 WHO: Geneva 2011

²⁰ Community Perceptions and Beliefs Regarding Low-Level Speeding and Suggested Solutions, Professor Soames Job, Chika Sakashita, Lori Mooren & Professor Raphael Grezbieta, Transportation Research Board, 2012

Speed limits around schools

There were a large number of comments concerning speed limits around schools. Respondents were almost universally supportive of at least part-time (time-limited) lower speed limits on school days and/or at relevant hours.

Only one school – Blanchelande College – was directly included in the proposals, because it is currently the only school in the island still bordered by a road with a 35mph limit.

While speed management measures such as time-limited speed restricted zones around schools fall outside of the scope of this consultation, measures such as these will be considered as part of a separate work stream – the development of school travel plans. Travel plans aim to improve transport options to and from schools with a particular focus on safe and convenient access, so a wide range of potential measures are included in their scope.

Summary of main themes

A summary of the key elements of the main themes are presented in Appendix 1, along with further additional issues which were raised in relation to the proposals.

Part Three

The Committee's Decision

The Committee's Decision

The Committee notes there is overwhelming evidence supporting the benefits of reduced speed limits.

It considers there are benefits to proceed with the introduction of 25mph speed limits to broadly cover all Local Centres and Main Centre Outer Areas, as identified in the Island Development Plan. These areas are recognised as community focal points where there is a higher concentration of residential properties, schools or amenities.

Having analysed all of the main topics raised in the public responses (above), **it does not consider that the objections raised any concerns or evidence that cannot be addressed or are significant enough to outweigh the benefits of proceeding with reduced speed limits.**

In view of this decision to proceed with the general principle of reducing speed limits to broadly cover all Local Centres and Main Centre Outer Areas, the Committee has further analysed comments made about individual roads. The details of these are outlined in the next section, **but the Committee concluded that whilst there was sufficient justification to proceed with all of the roads included in its proposals at this time, the suggestions for additional roads to be added should be taken into consideration as part of the planned larger piece of work to review speed limits across the Island.**

Feedback on individual roads

The comments received about individual roads have been divided into three categories:-

- 1 Objections to specific roads being reduced to 25mph;
- 2 Suggestions of roads where a 25mph speed limit could be introduced/ extended (those bordering the existing proposals); and
- 3 Suggestions of roads where a 25mph speed limit could be introduced (those not bordering the existing proposals).

1 Objections to specific roads being reduced to 25mph

The public identified four roads that they considered should be excluded from the 25mph zones: Braye Road, Gategny Esplanade, Route de Picquerel and Rue des Landes.

These are analysed in detail in Appendix 2 and have been summarised below, along with the decision taken on each.

Braye Road, Vale

The relevant section of road falls within the outer main centre and there is a concentration of residential and business properties. It includes the bend on approach to the Braye Road industrial estate, where the Committee has received complaints about it being hazardous and difficult for people trying to cross the road at this point.

There is, therefore, sufficient justification to proceed with the proposed reduction in the speed limit to 25mph.

Gategny Esplanade, St Peter Port:

Due to the high activity of vulnerable road users in the area, particularly the numbers of people crossing the road on foot using uncontrolled crossing points, the Committee considers that there is justification to proceed with the 25mph as proposed.

Route de Picquerel, St Sampson/Vale

No specific justifications were offered by the public to suggest why an alteration to proposal should be made. This stretch of road is within the Local Centre boundary and features many residential properties and a church/community facility. There is, therefore, adequate justification to proceed with the 25mph as proposed.

Rue des Landes, Forest

Again, no strong arguments were offered by the public to suggest an alteration to proposal should be made. There are houses, shops and businesses, plus accesses to the airport in addition to a busy garage along this road. These features justify the decision to proceed with the 25mph as proposed.

2 Suggestions of roads where a 25mph speed limit could be introduced/extended (those bordering the existing proposals)

The following suggestions made by the public are roads that border the existing proposals.

- Les Tracheries, St Sampson (request for extension)
- Les Martins, St Sampson (new)
- Ruelle de la Tour, Castel (request for extension)
- La Route de Sausmarez, St Martin (request for extension)
- Fort Road, St Peter Port (new)
- Rue Frairies, St Andrew (request for extension)
- Rue des Barras, Vale (request for extension)
- Rue des Varendes, Castel/St Andrew (request for extension)
- Les Merriennes, St Martin (request for extension)
- L'Aumone, Castel (request for extension)
- Rue du Friquet, Castel/Vale (request for extension)
- Les Roques Barrees, Vale (request for extension)

The Committee did give consideration to these suggestions but decided that this phase of works should concentrate of the Committee's original intention for choosing which roads to make 25mph as part of their proposals, which was primarily based on whether they fell within the Local Centres or Main Centre Outer Areas.

Therefore, the above suggestions will all be taken into consideration as part of the planned larger piece of work to review speed limits across the Island.

3 Suggestions of roads where a 25mph speed limit could be introduced (those not bordering the existing proposals)

A number of other suggestions of roads where 25mph speed limits could be introduced or extended were received. Those roads which were not bordering the existing proposals have not been analysed as part of this decision notice because they do not fall within the scope of the current proposals, which was to broadly cover all Local Centres and Main Centre Outer Areas. However, they will all be taken into consideration as part of the planned larger piece of work to review speed limits across the island.

Enforcement

The Committee intends to work with Home Affairs and the Police to improve road safety for all islanders. The Committee has meetings scheduled in the coming weeks to work collaboratively with Home Affairs and the Police in this important area.

There may in addition be a requirement for speed calming measures to be introduced in some roads in order to achieve compliance.

The Committee is also proposing that speed roundels are installed on the road surface (in addition to the signs) on some of the major roads to raise awareness of the change of speed limit when entering a Local Centre or Outer Main Centre. This will have the effect of highlighting the area as a speed limit zone – an approach that has been demonstrated to be more effective than simply signing individual roads.

Appendices

Appendix 1

Analysis of Comments

301 Responses in total

165 (55%) Objections

136 (45%) Expressions of support

290 Responses were received from individuals

11

Responses from organisations
(GBG, Parishes of the Vale, St Martin, St Andrews, St Sampson and Castel, GMTA, Living Streets, Public Health Service, Committee for Home Affairs and Guernsey Police)

Representations

Many respondents made multiple points and raised similar issues. These are grouped together in the table below. The number of times a point was raised is shown in column three.

Issue	Response	No of Comments
No evidence base	The underlying research and evidence to explain the benefits of reduced speed limits and more specifically why the roads proposed were chosen has been clearly set out in this decision notice.	67
Increase in pollution levels	This misconception is based on test-environment data of cruising speeds that are not particularly relevant to Guernsey, partly because the optimum cruising speed for fuel efficiency is far higher than our maximum speed limit (55mph-60mph) and partly because the areas covered by the proposals generally do not facilitate any kind of cruising speed anyway because of the various features that necessitate starting and stopping.	44

Real-world pollution data (local and UK) shows that lower speeds do not result in higher pollution levels. This is because in reality pollution is influenced by a much broader range of factors than cruising speed alone, such as engine type, fuel type, driving style (especially rates of braking and acceleration), stationary traffic, ambient temperature and road gradient. When it comes to pollution, however, there is a single common factor: motorised forms of transport. Research concludes that the benefits of lower speed limits far outweigh any potential negative impacts on air quality, especially if they encourage higher uptake of non-motorised forms of transport such as walking and cycling.

Cost/level of implementation & infrastructure requirements	The major cost of the project is in signage and road markings. However, the cost of signage will be minimal as many of the existing signs are being moved and reused. Also, the zone approach allows for signage on the entry points to the centres and therefore does not necessitate adding extra street clutter along the roads.	46
Unintended adverse consequences on road safety	It is internationally recognised that speed is the single most important contributor to road fatalities. There is overwhelming evidence to show that lower speeds reduce the likelihood of collisions and reduce the severity of resulting injuries. The UK's Transport Research Laboratory has published reports which show that every 1mph reduction in average urban speeds can result in a 6% fall in the number in casualties.	32
Increase in congestion	Traffic congestion is the result of vehicle volumes exceeding road or junction capacity. Lower speed limits are very unlikely to have any significant bearing on congestion, especially in areas or at times where there is already congestion, as the traffic tends to travel much slower than the limit in any case. Any modal shift towards walking and cycling that results from creating a less intimidating environment will improve the throughput and therefore improve congestion, as it will reduce the pressure on road and junction capacity.	20

Increase in journey times	In Guernsey, journey times are more dependent on how long it takes to negotiate a controlled junction. Therefore, the delay on journey times through reduced speed limits is likely to be negligible.	27
Enforce existing speed limits better	The Committee intends to work with Home Affairs and the Police collaboratively to improve road safety for all islanders.	17
Critical of blanket approach	<p>The Committee notes that the proposals encompass the areas that have been identified as those with the greatest concentrations of services and facilities accessed regularly by islanders.</p> <p>The proposals make the speed limits around our schools and in the island's Local Centres and Main Centre Outer Areas more consistent, in line with the island's existing, long-established speed limits policy of lower speeds in busy community areas.</p>	17
Support for part-time controls for schools	<p>Many responses included the suggestion for the introduction of part-time speed limits around schools as people could understand the merit of a lower speed limit at school drop off and collection times when there were high volumes of vulnerable road users and much more traffic, but did not consider there was justification for drivers to travel at these low speeds at other times.</p> <p>Part-time or time-limited speed limits are outside of the scope of this particular consultation but are being considered in a separate workstream – the development of school travel plans.</p>	63

Some general themes which were evident through the comments from respondents or through media are listed below.

Issue	Response
Proposals are simply a money making idea for the States	<p>There is no hidden agenda whatsoever by the Committee to introduce these proposals as a way of making additional income through those drivers committing speeding offences and it should be highlighted that the Committee does not receive any revenue associated with speeding offences anyway.</p> <p>The proposals are being introduced purely to improve road safety for all road users.</p>
This issue is so important it is a matter for the States of Deliberation	<p>The Committee notes that proposals for adding speed limits around the schools and in the island's Local Centres and Main Centre Outer Areas is in line with the island's existing, long-established speed limits policy of lower speeds in busy community areas. Because there is no change of policy there is no reason why it should be debated in the States. It clearly falls within the mandate of the Committee for Environment and Infrastructure and it is not considered best use of States' time to be debating which roads should or should not be included in such as scheme.</p> <p>However, it was always the intention of the Committee to bring a policy letter to the States in regards of recommendations related to the planned larger piece of work reviewing speed limits across the island.</p>
There was insufficient time allowed for the consultation as it was over the Summer holidays.	The Committee notes the high response rate and considers that a four-week consultation period was sufficient. Given the prevalence of social media newsfeeds and electronic communication, any member of the public who had left the island for the full span of the four-week period is likely to have been able to submit a representation even whilst off-island.
Improve infrastructure for pedestrians	The Committee is also committed to improving infrastructure for pedestrians through the introduction of new crossing points, new pavements, raised tables, dropped kerbs and blister paving etc. The introduction of new speed limits is complementing other work streams, not displacing them.

Appendix 2

Objections to specific roads being reduced to 25 mph

A number of objections were received from individuals who did not support the speed limit for a specific road being reduced to 25 mph. Those roads for which specific objections to a reduction in the speed limit are listed below.

Road	Objection	Response	No of Comments
Braye Road, Vale	<p>There was insufficient evidence to justify a speed limit reduction.</p> <p>Particularly as this was a long, straight, wide, arterial road with good visibility and pavement.</p> <p>The reductions should not apply to larger roads because during busy periods the road speed becomes self-limiting due to the amount of traffic. It was not near a school and there were not many pedestrians using the road.</p> <p>Finally there was a view that 25mph during the evenings would be too slow</p>	<p>There is overwhelming evidence that shows that lower speeds result in a lower likelihood of collision and lower rates of injury.</p> <p>Most of the road is straight but it includes the bend on approach to the Braye Road industrial estate – a point of the road that the Committee has received complaints about being hazardous and difficult to cross. Various reports support the fact that people that walk or cycle still feel vulnerable here.</p> <p>Speeds may be lower during busy periods, but road users should feel safe at all times of day.</p> <p>It is not directly near a school, but within walking distance</p> <p>Pedestrian flows are not as high as in some areas, but it is likely (judging by comments submitted to the Committee) that people may not be walking because they feel vulnerable. The decision to build a bridge is not based on the number of people swimming across a river.</p> <p>People have a right to travel safely on foot at any time of day. Hours of darkness can make them more vulnerable than they are in daylight.</p>	15

Glategny Esplanade, St Peter Port	<p>During busy periods the road speed becomes self-limiting due to the amount of traffic. It is also a wide road with good visibility. There was no evidence to justify the speed limit reduction particularly as there were wide pavements, islands for crossing and a segregated cycle path.</p> <p>Slower speed will cause more congestion.</p> <p>There are no accesses or junctions leading onto the road on the east side, only the marina</p> <p>Finally 25mph when traffic flow is low would be too slow</p>	<p>Speeds may be lower during busy periods, but road users should feel safe at all times of day.</p> <p>Whilst there is good visibility, it is more difficult for people to cross a wide road, especially roads that feature more than one lane of traffic.</p> <p>There is overwhelming evidence that lower speeds reduce the incidence of collisions and reduce the severity of resulting injuries.</p> <p>Even with the islands in place, people on foot still have to cross two lanes of traffic at a time on a very busy stretch of road.</p> <p>Delays on journey times are likely to be negligible, as explained in the report.</p> <p>There are accesses/junctions on the west side</p> <p>This road is near to major car parks, large businesses and hostelryes: there is therefore a regular flow of vulnerable road users outside of peak hours.</p> <p>25mph may feel too slow from the perspective of some drivers, but subjective feelings of drivers are not as relevant in the setting of speed limits as objective safety criteria relating to road users not afforded the relative protection of an enclosed motor vehicle.</p>	13
Route de Piquere!, St Sampson/ Vale	<p>Insufficient evidence to reduce speed on this arterial route</p>	<p>No strong arguments to suggest an alteration to proposal were made. The road is within the Local Centre boundary and this section has many houses and a church/community facility.</p>	1
Rue des Landes, Forest	<p>Insufficient evidence to reduce speed on this arterial route</p>	<p>No strong arguments to suggest an alteration to proposal were made. This section spans the stretch between two very close Local Centres. There are houses, shops and businesses along Rue des Landes, plus accesses to the airport and a busy garage.</p>	1

Appendix 3

Suggested Additions to the Speed Limit Reductions

A number of proposals were received from individuals who wished additional roads to be included in the list of roads with speed limit reductions to 25 mph. Those roads in the immediate vicinity, which were requested for inclusion, are listed below. There were also roads where a 25mph was proposed for part of the road and comments were received for the speed limit to be extended further. These are also listed.

Road	Reason	No of Comments
Les Tracheries, St Sampson (Request for extension)	Extend for full length of road as it is a narrow road with awkward bends, lanes joining it on blind corners, many properties and housing estate with limited visibility/difficult exits and high granite walls along parts of its length.	2
& Les Martins, St Sampson (New)	No pavement in some parts, and a narrow pavement which is very intimidating to walk down when larger vehicles are going past	
Ruette de la Tour, Castel (Request for extension)	Narrow for all of its length. 35mph is much too fast A popular route to/from Saumarez Park	2
La Route de Saumarez, St Martin (Request for extension) & Fort Road, St Peter Port (New)	Collisions occurring at concealed exit from business along Route de Saumarez Numerous collisions occurring along Fort Road particularly on approach to bend. There are also difficult junctions that join the road.	2
Rue Frairies, St Andrew (Request for extension)	There is an unprotected bus stop in the road just beyond the junction by Last Post and crossing to this from the pavement opposite is hazardous. The junction at the Last Post Pub is a well-known collision spot. The sight lines are very poor in places along the road - with sharp blind bends at either end.	4

	There are a number of difficult residential junctions A high concentration of residential properties. It does not make sense have a short 35mph section of road between two 35mph sections.	
Rue des Barras, Vale (Request for extension)	Concerned that a collision will occur as 35mph is too high a speed. A speed limit should not change part way down a road just because of an arbitrary line drawn on a map to mark a main centre. A more holistic approach based on the geometry/ physical characteristics etc of the road should be taken.	2
Rue des Varendes, St Andrew (Request for extension)	The road borders the Grammar School and Sixth Form site and is frequently busy with school children walking up and down the road, cycling along the road and crossing the road to access the school site. There is a bus stop on the road next to the school. There is no pavement on the north side of the road and there are many residential drives, a vehicular exit from the school playing fields and a vehicular service exit from the school straight into the road. Visibility is poor for many of these due to the natural curves of the road and/or walls/hedges. A reduced speed of 25 mph limit would make a significant positive contribution to road safety.	1
Les Merriennes, St Martin (Request for extension)	The Rue Poudreuse / Les Merriennes junction can be quite tight as it is, so encouraging those entering Les Merriennes to slow earlier can only be beneficial, and there is no need to encourage anyone to accelerate when heading towards Rue Poudreuse only to stop approx. 50m later at the junction.	1
L'Aumone, Castel (Request for extension)	Extend west to start at Saumarez Park or at least cover the junction of Le Villocq Lane and Route de Cobo. The Villocq Lane/Route de Cobo junction is an important pedestrian crossing point because there are busy bus stops on both sides of the road and built-up areas north and south of the main road. There has been a recent collision at this junction. The narrow footpath from the L'Aumone surgery to Saumarez Park is very dangerous for pedestrians - especially when walking with your back to the traffic flow.	2

Rue du Friquet, Castel/Vale
(Request for extension)

It is illogical to only make a part of Rue du Friquet 25mph, it should continue to the filter at the junction with Rue Cohu.

1

Les Roques Barrees, Vale
(Request for extension)

It is illogical to only make a part of Rocques Barrees 25mph, it should apply to the whole of the road.

1