

Dear Phil

The JEP has reported that you, as Chairman of the Environment Scrutiny Panel, wish to review the proposals for standardising and lowering Jersey's speed limits and are seeking input from the public.

I have not been able to find a formal consultation document, so am writing directly to you. You are entirely free to publicise my comments or not, as you see fit.

### 1. Evidence

I applaud the statements attributed to you in the JEP, to the effect that you seek evidence on "***the effect of speed limits on road safety***" and "***the relationship between speed and accidents***". The object of speed limits should be to improve road safety. They have no benefits per se. Setting and enforcing them without focussing on their proper objectives is not sensible public policy.

The commonly inferred assumption that there is some direct link between speed limits and actual speeds and accidents is simply not true. When the speed limit in Park Lane, London was increased from 30 mph to 40 mph in 1970, the 85 percentile speed ***fell*** from 43.6 mph (measured in 1970) to 39.2 mph (measured in 1974). In 1974, the Midland Road Safety Unit reported the results of a study of a large number of speed limit changes from 30 mph to 40 mph. Their conclusion that there had been no significant increase in either speeds or accidents was in line with the conclusions from a similar exercise for cases in other parts of the country carried out within the Department.

### 2. Popularity

From my political campaigning experience, I am aware that a significant proportion of Jersey residents, especially elderly ones, are keen on "***lower speed limits***". Further questioning suggested that the concern often arose from occasional drivers perceived to be substantially exceeding existing speed limits. It is very difficult to see how lowering the limits further will have any beneficial effect. Should government not only be responsive to public opinion, but also help inform that opinion with factual information and analysis?

### 3. Variation

Weather and road conditions, traffic density, driver skill and vehicle condition are all immensely variable – and the effects of these variables on accident rates are not necessarily what might be expected. It is widely stated, almost as a "truth", that elderly vehicles and elderly drivers represent higher-than-average risks. But the actual truth, as measured by insurance categories, is that really old vehicles driven by elderly ***enthusiastic*** drivers, have the lowest risk levels of all.

By contrast, conventional speed limits are arbitrary, rigid and inflexible – the same when the roads are icy and crowded, as when they are dry and empty.

#### **4. Zero Tolerance v Judgement**

The growth of zero tolerance in regulating society is a major generator of record numbers of quick and easy prosecutions and convictions. It is extremely difficult to see that in itself as a worthy objective of public policy. As applied to speed limits it is a clear indication that the entire purpose of speed limits (see 1 above) has been forgotten and the speed limits have become the objective.

I suggest that a much better, more civilised guide would be:

***“The normally careful and competent actions of a reasonable individual should be considered legal.”*** (Arizona Dept. of Transportation, 1999)

#### **5. Scale of the Problem**

According to UK data, more than 1 million miles are driven for every accident involving injury. Most drivers will go through their entire lives without having been involved in one. I suspect that Jersey is similar or better.

#### **6. Education & Training**

I suggest that in driving, as in many spheres of human activity, training and education, are extremely valuable. There is massive, consistent evidence of high accident rates in the months immediately following issue of a driving licence. This is true regardless of the age of the driver. This strongly suggests that continued training and testing in the years after obtaining a licence will only have a weak beneficial effect, whereas improved training prior to issuing the licence is likely to be highly beneficial.

Yours sincerely

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