

Dear Sirs,

In response to your advert in the Jersey Evening Press on 1 February 2011 I am writing to express my views on the consultation exercise.

I am writing having reviewed the "Summary of Responses" paper that was produced in 2009 on Island Speed Limits but have not been able to obtain a copy of the proposed Revised Speed Limits Policy as mentioned in your advert.

As your advert appears to concern mainly road safety I would like to note that many surveys have been completed which have conflicting views as to whether or not speed itself is the primary cause of most road traffic collisions. Indeed, whilst speed may be a contributory factor to the severity of injuries incurred, the collisions themselves are usually caused by a poor standard of driving.

As such, the most important response to this survey should be active measures to tackle the issue of driver competence, whether that is by increased traffic police presence, changes to driver training and testing requirements or other reasonable actions.

In response to the specific queries raised in your advert I would like to make the following points:

### **Changes to existing speed limits**

I do not agree that any blanket proposal of e.g. all 40mph limits to be raised or lowered is the appropriate solution. There are certain existing zones where current behaviour by the majority of drivers suggests they are wholly inappropriate, e.g. a significant number of drivers already exceed the 30mph limit at the underpass with no appreciable increase in the number of accidents. Therefore, I would recommend that before any changes are implemented that random surveys are conducted along key routes to identify whether existing behaviour suggests the limits may be inappropriate. Such surveys should be conducted in a manner that will not affect driver behaviours.

As part of your consultation I would also suggest greater consideration be given to the use of variable speed limits, as is currently the practice in a number of high risk zones past schools. For example, the Avenue may be a prime candidate for a higher speed limit late at night and early morning as the volume of traffic is significantly reduced and there are minimal inherent risks (i.e. good visibility and good separation from pedestrians) on that particular stretch of road.

My belief is that drivers are more inclined to respect speed limits where obvious consideration has been given to their appropriateness and location. For example, temporary 20mph limits past schools have a very obvious reason and are generally supported by motorists. Where there is little apparent need for low limits many drivers will therefore drive at speeds in excess of the posted limit, as deemed safe by their judgement of the situation.

The 2009 survey gave a fair presentation of views on the appropriateness of existing speed limits and I would echo the support for 30mph zones within urban environments. However, the definition of an Urban Environment needs to be carefully considered and adhered to, a single householder complaining loudly about 'speeding vehicles' should not be able to cause a reduction in speed restrictions.

Regarding other zones, my views are as above i.e. that variable speed limits may be a more elegant solution to match restrictions to the varying conditions and risk factors at different times of day.

### **Penalty system and enforcement**

The current system of penalty, whilst administratively burdensome, may present a greater deterrent to committing traffic offences as the perpetrator is required to explain their actions as part of a formal proceeding rather than simply receiving a penalty notice and receiving points on their licence. Feedback from the recent implementation of Speed Awareness Courses in the UK would also suggest that education is far more effective than punishment for minor offences.

I would fear that using a points based penalty system may also encourage the use of automatic penalty systems, such as fixed speed camera's, which do nothing to identify and address the root cause of that behaviour and hence little to mitigate future reoccurrence. These devices also do little to enhance the quality of driving and indeed, may be argued to simply be another distraction to the driver.

In order to enforce the existing traffic laws (i.e. not limiting enforcement to solely speed limits) a combination of measures such as increased traffic police presence, information signage, flashing smiley/grumpy reminder signs will be significantly more effective than any single measure.

In conclusion, I am therefore strongly against the introduction of such a penalty points based system and strongly in favour of any enforcement measure which favours driver education rather than penalisation. Otherwise, how will standards be improved?

### **Improving road safety**

As highlighted in the opening paragraphs to my letter, I wholeheartedly do not agree that enforcing or changing speed limits will automatically lead to an increase in road safety. Unfortunately, in my experience, the standard of driving by a number of drivers on our roads is, at best poor, and at worst, dangerous. A significant portion of these are driving within existing speed limits. Common behaviours I have observed are:

- performing manoeuvres with a combination of no/poor observation and no/late indication;
- drivers distracted by holding conversations on mobile phones;
- an inability to control their vehicle e.g. unnecessarily encroaching into the lane of oncoming traffic at bends in the road; and
- apparent lack of understanding of existing road signage, stop lines being a prime example.

If the purpose of this consultation is to try and improve road safety then due consideration must be given to these, among other, causes of inconsiderate and dangerous driving rather than assuming a decrease in speed limits will directly improve road safety as has often been mused.

It is an interesting paradigm that drivers often pay less attention to the road at lower speeds and hence start to exhibit a greater frequency of other, more dangerous behaviours as they rationale the consequences of any errors are reduced.

Should you wish to discuss any of my comments in greater detail please do not hesitate to contact me.

Yours faithfully,

Mark Hooton