

I would submit the following comments:

1. In general I agree with the Minister's proposals. Whilst the principal reasons for speed limits are safety related, it is often overlooked how anti-social the noise pollution created by aggressive driving is. I lived for many years on a busy main suburban road - the type the minister proposes a reduced 30 mph limit for - and noisy speeding traffic was a constant annoyance and can become a health hazard to the very sensitive and young children. But the most compelling reason for reducing limits in built-up areas, or even Island wide, is the substantial higher risk of death or serious injury to pedestrians from impact at even a 10mph higher vehicle speed - statistically unarguable.

2. At a constant speed of 40 mph, from one side of the Island to the other (approx 9 miles) a saving in journey time of approx 5 minutes would be achieved. This in itself is little enough to consider a worthwhile gain - what journey is that important that a 5 minute saving is vital? - but in practice it is impossible to travel at any constant maximum speed because of the various areas of lower limits, traffic congestion and other obstructions that are encountered on any such journey, so the true saving is actually much less. What is more, the majority of all vehicle journeys must be much less than the full length of the Island, in all probability under half with most centering on St Helier as the start/finish, so even less of a time difference.

3. As highlighted by the Scrutiny Panel, one of, if not **the** most important issues, whatever the resultant speed limits, change or no change, is that of **ENFORCEMENT**. Existing resources are simply unable to sufficiently enforce limits and under present budget restrictions there must be very little chance of much, if any, increase in these resources. However there are ways that enforcement can be improved cost effectively: one being the re-introduction of police motor cycle patrols that I seem to recall was under consideration or discussion recently under some other traffic issue, or maybe it was just under the heading of efficient use of resources. More visible police presence would surely act as a deterrent to would-be speedsters. **But the best and most efficient means of enforcement is the use of speed cameras.**

I am well aware that in the UK they have a reputation with some (mainly the petrol head brigade or those who have suffered at the hand of speed cameras) as purely revenue gatherers which criminalise unfortunate citizens, but I would suggest:

- Law breakers criminalise themselves and it's not as if speed cameras operate secretly, there are notices warning on approach. The use of cameras would also have spin off benefits of helping to detect other offences such as dangerous/careless driving and vehicle theft ('borrowing').

- There is nothing morally wrong with revenue raised from law breakers of any type and past experience has shown just how productive speed cameras have been.

Currently of course some cameras in the UK are being turned off - not because they are ineffective but because of the ridiculous situation that whilst central government receives the revenue, local councils have to pay for the maintenance and under the present cutbacks many just can't afford the expense. Jersey need not create the same daft situation.

4. Hand in hand with enforcement is the question of **penalties**, as again raised by Scrutiny. These should be severe enough to act as a serious deterrent and in a wealthy island like Jersey fines alone (although they should be substantial and on

an escalating basis for serial offenders) should definitely be complemented by a **totting up points system** leading to disqualification. The threat of depriving an Islander of their driving licence and comfortable, convenient transport, particularly with a less than comprehensive public transport system, must surely act as such a serious deterrent.

In summary, whilst I am hopeful that some concrete measures will arise from the Policy Review, I do fear that as is usual when Islanders enjoyment of their motor vehicles is threatened the objectors to any restrictions will be more vocal than the silent majority who rely on their elected representatives to look after their interests, having experienced this outcome on this very subject at Parish Hall meetings.

Yours faithfully

Michael Keites