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## Select Committee on Transport, Local Government and the Regions [Appendices to the Minutes of Evidence](#)

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### Memorandum by The Association of British Drivers (RTS 11)

#### ROAD TRAFFIC SPEEDS

##### SUMMARY

1. In recent years far too little research has been carried out into the causes of road accidents. Research that has been done has often started from the questionable presumption that the only route to improvements in road safety lies in the rigorous management of vehicle speeds. Conflicting viewpoints are ignored, irrespective of the significant weight of supporting evidence.
2. The result is that modern road safety studies have from the outset been compromised in seeking to legitimise a particular road safety agenda instead of really seeking to address accident causation, and from there going on to identify effective improvement strategies.
3. Based on the blind acceptance of the flawed and simplistic "Speed kills" soundbite, speed enforcement hypothecation schemes are currently being expanded country-wide. One of the highly regrettable consequences of this is that, contrary to all the cardinal rules of British justice, those involved in the setting and enforcement of speed limits now also have a financial interest in the process. This is leading to the proliferation of speed limits which are purposely inappropriately set and enforced, with revenue generation—rather than road safety—in mind.
4. It is a source of some concern to the Association that the DTLR is shortly to issue revised "guidelines" to police officers on the completion of STATS 19 accident causation forms. This is clearly in response to the fact that (as recorded in eg, Transport Research Laboratory Report TRL 3231) the aggregated submissions of well-trained police officers are (justifiably) undermining the legitimacy of the "Speed kills" campaign. By aggregating causation categories, the Department is seeking to conceal this.
5. Instead of an unhelpful and unproductive concentration on the single element of speed enforcement, the Association of British Drivers' approach would recommend a return to a balanced emphasis on the Three E's of road safety: Education, Engineering and

Enforcement. Each element should be neither overwhelmingly more, nor less, important than the other two; in definite contrast to the unbalanced situation currently in existence. The Three E's should be directed at improving road safety by modifying the attitudes and behaviour of all road users; not exclusively motorised ones.

## DISCUSSION

### *(1) The role of illegal and inappropriate speed in respect of causing crashes, and the severity of accidents*

To cover this point a clear understanding of the definitions involved is essential. For this paper illegal speed is that which exceeds the posted limit, and inappropriate speed is that which is unsafe for the conditions existing at a particular time and place, whether above or below the posted limit.

It is clearly impossible to set a posted limit that reflects the appropriate speed for all the circumstances and conditions that may be encountered. Within a 30 limit there will be times and places where 40, or even 50, is safe but illegal. There will also be many places where 30 is legal but unsafe. It is also possible for a speed to be too slow for safety, as demonstrated by the moped ban on motorways and the need for a police escort for slow loads.

Inappropriate speed is much more likely to lead to casualties than illegal speed, particularly as the "speed kills" regime is leading to the lowering of many limits to an unrealistic level.

Setting limits according to Annex A to Circular Roads 1/93 gave clear guidance to the driver as to the hazards he could expect to find. Ignoring these guidelines is leading to an increase in illegal speeding where the limit is inappropriate. The devaluing of the safety message that should be implicit in the posted limit is also leading to an apparent increase in inappropriate speeds in areas where the limit is correctly set.

There can be little doubt that injury severity rises with speed of impact, however, to base a road safety campaign on this fact alone is to imply that there is a safe and acceptable speed of impact.

### *(2) Reducing the quality of life in urban areas*

This is subjective and a matter of balance. Congestion brings a reduction in traffic speeds without producing claims of an increase in quality of life.

Many complaints of speeding traffic are investigated and found to be unjustified. Often these complaints are based on speeding traffic being heard rather than seen. It seems probable that they are generated by driver behaviour rather than actual speed. Wheel spin when pulling away, together with high engine revolutions in low gear can give a completely erroneous impression of speed.

### *(3) The consequences of illegal and inappropriate speed for urban design:*

It should be possible to design the urban environment in such a way as to reduce illegal speeds. However such designs will probably increase the opportunities for, and occurrence of, inappropriate speed.

### *(4) The availability and reliability of research on the consequences of, and reasons for, illegal and inappropriate speed:*

There is little basic research available, especially in recent years. Much of the claimed research is a re-hashing and amalgamation of old research. The only truly new research into accident causes is TRL 323, a report on a new system for recording accident causes. Most Local Authorities do not collate accident causes, and the number that do has been reducing since they were presented the panacea that if someone was hurt it must be due to speed. There are other sources which bring into question this simplistic view.<sup>2,3,4,5</sup>

The research that led to the setting of speed limits according to the 85th percentile led to us having some of the safest roads in the world. We should be building on this by identifying accident causes and trends, not throwing it away with blind acceptance of the simplistic "Speed Kills" soundbite.

There are many questions that need answering. Media coverage gives the impression that many casualties result from joyriding, vehicle theft and getaway attempts from other crimes, often with a police pursuit element. What percentage of speed related casualties are a result of crime?

It is widely accepted that around two thirds of drivers exceed some speed limits, yet the worst abuses of statistics only claim that speed causes one third of accidents, with the true figure likely to be around 10 per cent. It would seem that some limits are set at levels it is safe to exceed. Are they being set too low?

Many areas that claim successful casualty local reductions through speed reduction/enforcement measures actually have an area wide increase in casualties. Where are the discrepancies arising and why aren't the responsible authorities being asked to account for them?

### *(5) The reasons for the very high pedestrian casualty rate:*

As we have a good general road safety record something unusual must be happening with pedestrians. Many of the recent road safety studies have identified that a pedestrian hit by a fast moving car will be injured.

Little information is available as to why the pedestrian was hit by the car. TRL 323 and other sources<sup>6</sup> indicate that around 80 per cent of pedestrian injuries result from the pedestrians' own actions. In Staffordshire pedestrian action is the cause of 9.2 per cent of all road accidents. In Stoke-on-Trent it rises to 16.5 per cent—more than twice the 7.7 per cent attributed to speed.

Yet many pedestrians and cyclists see "speed kills" as a statement that they have no part to play in casualty reductions.

A European study of young people and the abuse of alcohol and drugs found that our young people are the least supervised in Europe. Could this lack of parental supervision be responsible for our high child casualty rate?

### *(6) The role of enforcement:*

Better—as in higher quality—enforcement is part of the answer. Illegal speed may, to some extent, be treatable by camera based enforcement of the limit. However the camera cannot differentiate between inappropriate speed and illegal speed. Indeed the camera will, in many cases, totally fail to detect inappropriate speed.

While a fixed penalty ticket generated by a camera will have a punitive effect it carries little educational value about an event from two weeks previously.

These are figures available that seem to prove that camera enforcement reduces casualties. Generally this is only true at specific sites, and it seems probable that all that is happening is that the accidents are transferring elsewhere. This view is supported by the County

casualty figures for most areas that claim improved road safety through the use of cameras. There is also some evidence that statistics are being used selectively, with a return to "average" casualty figures after an anomalous year being claimed as proof of success.

From a road safety point of view it makes much more sense to stop the driver at the time. In cases of inappropriate speed a caution coupled with advice on safe driving techniques could be much more productive.

Road safety education and accident investigation, not just speed enforcement, should be a core function of the police, in conjunction with the local authority and road user groups.

#### *7. Road re-design and traffic calming:*

As one of the Three "E"s engineering has a part to play in road safety. However, where possible it should be used to improve traffic flows by removing obstructions and extending lines of sight. Humps and chicanes are being increasingly seen by drivers as devices to discourage road use rather than improve safety.

Most drivers are responsible people and travel at what they consider a safe, even if illegal, speed for the conditions.

"Whole area" treatments that lead to a reduction in the perceived safe speed have been seen to work, whereas the introduction of deliberate obstacles on a wholesale basis often leads to resentment and attempts to reduce their effect.

#### *8. Road re-classification:*

There is no reason for re-classification to affect the safe speed for a road. Drivers are not aware whether they are driving on a trunk road or any other class of road. The introduction of unnecessarily low speed limits and inappropriate white lines by the Highways Authority as part of the de-trunking program is widely resented and devaluing properly set limits and properly used white lines.

#### *9. Physical measures to separate pedestrians and cars (eg barriers):*

In theory a good idea. It should be noted that most pedestrian barriers would not stop a vehicle, and so are there only to keep the pedestrian from the traffic, not vice-versa.

However, it is clear that pedestrians are determined to take the shortest route between any two points, and to achieve this will climb any barriers and ignore the presence of crossings and lights. They find subways intimidating and, particularly in the case of females and the elderly, can be nervous about the "stranger danger" involved in using dedicated routes away from traffic.

The statistics show that the overwhelming majority of pedestrian road casualties occur on the highway rather than on the footpath, yet many new roads and bypasses are built without a footpath or cycleway, as are many roundabouts.

There is a need to identify the pedestrians' preferred routes and crossing places and then to make them as safe as possible, rather than to try to artificially "manage" them.

#### *10. Technology (eg through Intelligent Speed Adaptation and car designs which promote pedestrian protection):*

There are many concerns about ISA, some raised by those developing the system. In fact, it may be that ISA actually decreases driver involvement, thus leading to inattention and higher accident rates.

The research published to date shows an increase in drivers following too closely. This behaviour is identified (incorrectly in the ABD's view) by the DTLR as one of the causes of speed-related accidents.

ISA will reduce overtaking opportunities and lead to longer overtaking manoeuvres, increasing driver frustration and increasing the risk of accidents while overtaking. Accidents while overtaking are also identified by the DTLR as a speed-related problem.

In a purely theoretical setting ISA would perhaps appear to have its attractions, but this takes no account of driver psychology.

A warning light to inform the driver when he exceeds the posted limit may perhaps have its uses, but taking control away from the driver could, under some circumstances, be exceedingly dangerous.

Designing vehicles so that they can more safely hit a pedestrian would no doubt save some lives, but not as many as ensuring that the pedestrian and vehicle do not come into contact in the first place.

#### *11. Education to improve drivers' and motorcyclists' behaviour and pedestrian and cyclist awareness:*

The wording of this phrase amply demonstrates an unfortunate bias and lack of understanding of the problem on the part of those responsible for trying to develop solutions to it. All road users have room for improvement in both behaviour and awareness.

The police have a clear role to play in this. The spread of in car video record and playback ability offers a chance for the police to point out dangerous and unacceptable actions and offer advice as part of a road safety campaign. This advice is needed as much by pedestrians and cyclists as it is by powered road users.

The "speed kills" message seems to exonerate cyclists, pedestrians and parents from any responsibility for road safety, while discouraging drivers and riders from taking advanced training—they already know how to drive slowly!

More publicity must be directed on the advantages and responsibilities of being a skilled road user, rather than a slow road user. There should also be more incentive to take advanced training, or, in the case of pedestrians and cyclists, any training. Reductions in insurance premiums and the removal of VAT from training would perhaps help.

#### *12. Changes to speed limits:*

Speed limits should be set to an understandable national standard, particularly on through routes. As it is impossible to set a limit to cover all conditions the set limit can only ever be seen as a guideline as to the general environment. The message sent by the limit needs to be consistent across the country, and to be based on safety considerations. The use of speed limits to make a road or route unattractive devalues the safety message that should be clear and understandable.

The reduction of limits on "joining roads" between residential areas is removing the demarcation that used to exist when entering higher risk residential areas, and is also leading to longer, and therefore riskier, overtaking manoeuvres. In many places these reductions should be reversed.

#### *13. Specific policies which should be implemented:*

It may be useful to make road safety a core function of the police. While this would obviously have an enforcement aspect there

should also be a "crime prevention" educational role, as applied to other forms of crime.

More use needs to be made of the dangerous and careless driving laws, preferably at a stage before casualties result. The present regime of ignoring damage only accidents allows bad driving to go uncorrected until it finally results in a casualty.

"Speed Kills" is both too vague and too simplistic a statement as a basis for a national campaign. Inappropriate speed is just one aspect of bad driving, and its contribution to casualty figures will vary from area to area.

There is a need for national promotion of safe, skilled driving techniques, backed up by identification of local casualty causes and targeted local engineering, education and enforcement measures.

*14. The extent to which relevant bodies are taking the right actions:*

It is clearly correct to be promoting road safety and casualty reduction. The majority of the voluntary lobby groups and organisations promote training as the solution, including the skills and observations needed to select a safe and appropriate speed for the conditions.

Unfortunately too many bodies are erroneously seizing on the "speed kills" message as the whole solution to casualty reduction and ignoring the wider picture. Casualty reduction schemes should actually reduce casualties, not just displace them elsewhere.

*15. Provision of a co-ordinated approach to speed management by local authorities, DTLR, the Highways Agency, the police and Home Office:*

Lack of national co-ordination is part of the cause of illegal speed, and to a lesser extent causes inappropriate speed.

Speed limits should be set to a national standard for the purposes of road safety. These standards should be based on sound road safety principles such as the 85th percentile rule; and not on anti-road use dogma. The use of limits as a traffic management tool is unacceptable, as previously explained.

Speed limits should indicate the level and type of hazards to be expected on a road, and should change when conditions change. The present tendency to reduce limits to the lowest possible level removes all indication of changing risk levels, and should be reversed.

*16. Appropriateness of sentences imposed by magistrates and judges on those convicted of speeding offences/other possible approaches:*

The "production line" approach of issuing of camera generated fixed penalties for illegal speeding gives no useful road safety message, awarding the same penalty for a "dangerous" 35 on a busy road at school time as it does for a "safe" 35 on an empty road at 4 a.m.

The excessive fines imposed by the courts on those that dare to challenge a fixed penalty means that even those who are not guilty are accepting the fixed penalties. Coupled with the lack of any identification evidence of the driver's identity, which makes it possible for, say, a wife to protect the breadwinner's driving licence by falsely claiming to have been the driver, any safety message is so diluted as to be non-existent.

Speeding tickets are being increasingly seen as purely one of the costs of motoring.

*17. Appropriateness of the attitudes to speed amongst motor manufacturers, the national press, TV motoring programmes and advertisers:*

Again, there appears to be a bias inherent in the question. It is also important that the Government is not seen to be "censoring" the media, either directly or through bodies like the ASA.

Some magazines do little for road safety, with their constant promotion of "dangerous and challenging" roads, and some of the descriptive language used in their road tests. It is difficult, however, to quantify the harm done.

In some cases the identification of certain roads and venues as "challenging and dangerous" can be seen as by some road users as challenge to prove their driving or riding ability. More often it seems to generate some sort of "wish fulfilment fantasy", as demonstrated by the large numbers of non-biker onlookers that turn up at publicised biker gatherings.

An emotive article describing the joys of aggressively driving latest 200 mph car or 'bike will do little to alter the driving habits of those not already inclined to that style of driving, and will be read by most as pure escapism. Complaints that a blurred background in an advert will encourage inappropriate speeds are clearly frivolous, and should be seen as such.

It would be more productive for the media to promote driving skills relevant to the road in a "fun" way, possibly with televised competitions calling for a high level of driving skill.

*18. The role of speed management strategies:*

Speed management has a part to play in road safety, but should preferably be through engineering and education, with enforcement reserved for the dangerous offenders.

To give an extreme example:

The building of a three lane motorway standard access road through a residential estate would not lead to a natural traffic flow at 30 mph. No amount of signs, humps and white paint would make it seem that 30 mph was the optimal speed. Build the road with one lane each way and 30 mph becomes a much more acceptable and understandable speed limit.

If casualties occur their cause should be identified and targeted. The present system of investigation means that those responsible for the design and maintenance of roads and schemes perform the investigation—they could be resistant to shouldering any blame.

Should such investigations be carried out by, say, a neighbouring authority who would bring a truly independent view?

## CONCLUSIONS:

The current road safety strategy is inherently unbalanced; relying almost entirely on speed management and enforcement. In many cases this is largely the result of financial, rather than road safety, considerations.

A return to implementing a balanced road safety policy embodying all three of the key elements of road safety: Education, Engineering and Enforcement offers a much more productive and effective method of achieving meaningful road safety improvements. Such a strategy would also generate public (and hence electoral) support rather than growing suspicion, resentment and opposition, as is the case with the current approach.

January 2002

## REFERENCES:

1 Transport Research Laboratory Report TRL 323: "A new system for reporting contributory factors in road accidents", Transport Research Laboratory, Crowthorne, Berkshire, United Kingdom.

2 "Accidents on Rural Roads—A Study in Cambridgeshire" AA Foundation for Road Safety Research/Cambridgeshire County Council, 1994.

3 *Traffic Crash Facts 1996*—Florida Department of Highway Safety & Motor Vehicles, 2900 Apalachee Parkway, Neil Kirkman Building, Tallahassee, Florida 32399-0505.

4 "Effect of speed limits on speed and safety: a review", Wilmot, C G and Khanal, M, Transport Reviews, Oct 1999, Vol 19, No 4, pp 315-329.

5 Report No FHWA-Rd-92-084, US Department of Transportation Federal Highway Administration, Research, Development and Technology, Turner-Fairbank Highway Research Center, 6300 Georgetown Pike, McLean, Virginia, 22101-2296.

6 "But it is not excessive speed in relation to the speed limits that is the problem, but speed relative to the prevailing conditions, which almost always is less than the speed limit, that is the culprit. Recent figures (1998) from the Cornwall Road Safety Unit back this up. None of the fatal accidents that occurred that year are attributed to speed in excess of the limit, but 38 per cent of fatal accidents were due to going too fast. In the serious accident category in the same year, just 2 per cent were attributed to being over the speed limit and 28 per cent due to going too fast ...speed in that context is not responsible for the vast majority of tragedies laid at its feet. It seems that the Government is prepared to do a lot about a little and little about a lot. It's too easy to just put up more cameras and rake in the cash. Education is what is required, not castigation. Report in "Driving" magazine, Jan/Feb 2000, p 44. Statistics taken from the leaflet: "Road Accidents in Cornwall 1998", Cornwall County Council Road Safety Unit, Scorrier, Redruth, Cornwall.

7 West Midlands Road Accident Reviews 1998, 1999 and 2000, jdt (Divn. Of Mott MacDonald), Canterbury House, 85 Newhall Street, Birmingham, B3 1LZ.

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