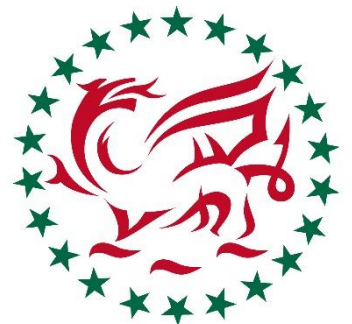




Proposal to reduce speed limit to 20mph on residential streets

1st October 2021



CLILC • WLGA

Introduction

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities (LAs) in Wales. The three national park authorities and the three fire and rescue authorities are associate members.
2. The WLGA is a politically-led cross-party organisation, with the leaders from all local authorities determining policy through the Executive Board and the wider WLGA Council. The WLGA appoints senior members as Spokespersons and Deputy Spokespersons to provide a national lead on policy matters on behalf of local government.
3. The WLGA welcomes the opportunity to respond to the consultation on proposals to reduce the speed limit to 20mph on residential streets. The specific consultation questions are aimed at residents whereas this response focuses on more general issues from the perspective of local authorities, who will play a key role in implementation. The comments are primarily about resources and timescales.

Comments

4. The WLGA supports Welsh Government's ambition of reducing traffic speeds in urban areas on restricted roads and recognises the rationale behind the policy. The introduction of a national 20mph speed limit on restricted roads supports Welsh Government legislation and policy on transport, active travel and decarbonisation. It is a cross-cutting policy change which will contribute not only to road safety but also a modal shift towards active travel, improve physical and mental health and well-being and support the Welsh place-making agenda.
5. Research indicates that this policy will have a positive influence on road safety and create safer conditions to encourage active travel, have a positive effect on community cohesion and the local economy. The idea is based around more liveable neighbourhoods where streets become a shared space for all users.
6. However, looking at the detail of the proposals there are some significant issues for local authorities which need to be raised and addressed around resources, timescales, costs and compliance/enforcement for this programme to be successful.
7. The Welsh 20mph Task Force Group Final Report from October 2020 recommended that:

'Local authorities should base the proposed changes to local speed limits on the maps produced by the Transport for Wales GIS tool.... They should undertake effective consultation with local people and other stakeholders, with a particular focus on those sections of highway that have been identified using the GIS tool as potential exceptions to the 20mph default limit for restricted roads'(para 12).

Welsh Government should make additional resources available to local authorities to enable them to consult on, design and implement widespread changes in local speed limits and to provide monitoring data'(para 21).

Resources and timescales

8. For the 20mph national programme to be effective and successful it is important for local authorities to be fully engaged and informed of the timelines and progress of the programme.
9. WLGA encourages Welsh Government to respond to local authorities' requests to engage with all local Members, not only at Leader/Executive level. For this policy to be successful it is vital that local Members are informed and supportive of the initiative.
10. Welsh Government is committed to bringing in the change to the speed limits on restricted roads in April 2023.
11. Before that date, local authorities are required to review the Exceptions maps produced by Transport for Wales and to undertake 'effective' consultation on the maps. This is a process that local authorities are best suited to take on themselves, due to the need for local knowledge of the highway network. Therefore, relying on external consultant support is not generally going to be a suitable option. Sufficient time and local personnel are required to complete the reviewing of the maps. Even if consultants were to be engaged, some local authorities have raised issues around shortage of engineers across the whole system. Concerns have been raised around:
 - General lack in road engineers, with North Wales LAs in particular reporting shortages of technical specialists e.g. engineers, and difficulties recruiting qualified people.
 - Many LAs affected by labour shortages, material delays, material cost inflation
 - Private sector suppliers are shortening their tender periods due to rapid escalation of prices – quotes are valid for less time than previously.

12. As an example, a brief snapshot of 1 out of 58 council wards in Carmarthenshire illustrates the scale of the task ahead and demonstrates the implications of the proposed legislation. The WG proposals relate the 20mph speed limit to roads which have streetlighting, just as the current legislation implies a 30mph, but many of the Carmarthenshire's 'urban' roads do not have streetlighting and are subject to TROs for a speed limit. Conversely, the LA also has a number of roads in urban areas which have streetlighting but would not be suitable for 20mph. In these cases, to avoid a fragmented approach, the council will have to revoke existing TROs and make new ones. In the one pilot ward the council has looked at they believe they will need to revoke existing TROs for 4 locations and make new TROs for 5 locations. If this ward is representative of the rest of the County and the council will have to revoke TROs for over 200 locations and draft new orders. The council's TROs are not digitally mapped and would require a lot of research. The council has made clear that it will not be able to achieve these tasks within existing resources.
13. In addition, local authorities will require resources to audit roads and traffic signs, identify speed limit changes, develop proposals, undertake consultation and prepare draft orders, administrate the order making process and design new speed limit signing. Local authorities are also obliged to advertise each TRO in local newspapers which will add a significant cost.
14. Each TRO is open to comment and objection. Many urban streets will be reasonably straightforward but around the boundaries of urban areas there is likely to be significant debate and potential objection, particularly from those outside the new limits. Given the scale of TROs involved this will have a very significant impact on timescales and bring the proposed implementation date of April 2023 into question.

Costs

15. Welsh Government has committed to make additional resources available to local authorities. However so far, Welsh Government has not informed local authorities of any further detail of the level of financial resources that will be made available and whether Welsh Government will fund the entire national programme. Local authorities require:

A: Revenue resources to:

- a. Review routes for suitability/ exceptions (needed this year)
- b. Undertake any pre-change monitoring (noise/ air quality/ speed) on priority routes (needed this year and 2022-23)
- c. Asset survey all 30mph signs, lines, markings that will need adjusting (needed this year and 2022-23)
- d. Survey and map existing TROs

B: And then:

- a. Resources to draft new TROs
- b. Capital resources for the replacement of signs, lines and markings (needed in 2022-23).

Timing

16. WLGA is also mindful of the fact that local elections will be taking place on the 6th of May 2022 and that date is close to the proposed date for the legislation to be laid before the Senedd (currently planned for the 22nd of March 2022). This might create issues around the pre-election period, a time during which local authorities might not be allowed to consult and would likely need to wait until the new Councillors are in place. A delay would avoid 'lost time' for post-legislative implementation, although this would require a review of the intended 'go live' date for national change-over.

Compliance / Enforcement

17. It would be helpful if LAs could have access to all the 'tools' available to support enforcement. In some parts of Wales, especially Valley communities, there are 'ribbon settlements' which are likely to see many miles of the 20mph limit. In such areas, compliance could be a problem, especially at non-peak times.
18. At the moment the use of average speed cameras would be precluded due to constraints related to the criteria for establishing speed camera sites. Some flexibility in the criteria to recognise the need for effective enforcement and allow installation of average speed cameras where there is evidence of poor compliance would be helpful.

Closing comments

19. WLGA has been working closely with Welsh Government in taking forward these proposals. It is hoped that the above comments are seen as constructive and can be taken on board and worked through together, with full LA engagement, as part of the ongoing work.

For further information, please contact:

Tim Peppin, Director of Regeneration and Sustainable Development, and Kaarina Ruta, Transport Assistant

tim.peppin@wlga.gov.uk and kaarina.ruta@wlga.gov.uk;

Welsh Local Government Association

Tel: 07747 483761 and 07990 280868