

Roads Service – Setting Local Speed Limits in Northern Ireland – Consultation on Draft Policy.

Having considered the consultation publication – *Setting Local Speed Limits in Northern Ireland – Consultation on Draft Policy* and the accompanying *Draft Policy Document*, the Council would take the opportunity to comment in respect of general and specific issues.

General

It is welcomed that the Department for Regional Development has stated that its principal objective is ‘balancing the need to travel with the need to improve quality of life’. This latter element to improve the quality of life is a core objective that would be shared with the Council.

The document refers to a range of issues and considerations in respect of the wider localities and the communities through which roads pass. The document should contain overt recognition of the importance of road infrastructure as a significant part of the local environments. In addition to their role in enhancing connectivity, it should be recognised that there can be significant severance implications related to road infrastructure (Para 28). Whilst it is recognised that the document is inherently technical in nature and focus, there are elements of the processes or consideration in respect of locality or community that will be more subjective.

This recognition of the wider function and the potential impact on communities would contribute to the balanced consideration of proposals and suggests a formal requirement for earlier engagement and consultation in respect of proposals. The consideration of the “improved quality of life” (Para 22) and the acceptance that speed limits are only one element of speed management places an onus on the Department to formally engage with Council at an early stage of the process. This engagement would also facilitate the consideration of the potential for such traffic measures to contribute to broader strategies or initiatives. The importance of the road infrastructure and operation to local environments contributes to the potential for their modification or management to make a positive contribution to broader agendas to enhance community well being.

In respect of the potential requirement for a range of calming or other measures (Para 72 to 75) there should be recognition of both the existing operational responsibilities of local Councils and their potential post RPA roles. This should be reflected in the formal recognition of the requirement to engage with local Councils early in the process. Whilst in Appendix B “The Consultation Process”, it is suggested that various bodies “should” be consulted or notified at design stage, the engagement should be at the earliest stages of consideration.

Specific

It is again noted that the Department for Regional Development has stated that its principal objective is ‘balancing the need to travel with the need to improve quality of life’. Accordingly, the Department has highlighted that it is committed to reducing road traffic collisions and casualties, and developing safer environments for all road users, within a road system, which aids wider economic and environmental objectives in a sustainable way, acknowledging that effective speed management involves numerous components, designed to encourage, help and require road users to adopt appropriate and safe speeds.

Within Northern Ireland, the national speed limit of 30 mph applies on street lit roads, 60 mph applies on single carriageway roads and 70 mph applies on dual carriageways and motorways. However, it has been recognised that national speed limits are not appropriate to all road situations and therefore, the speed limit provisions enable the Roads Service to set 'local speed limits' in situations where it is desirable for drivers to adopt a speed, which is different from national speed limits. Therefore, the guidance document provides for Roads Service traffic managers to have the flexibility to set local speed limits that are appropriate for the individual road, reflecting local needs and taking account of all local considerations.

In establishing a local speed limit, Roads Service traffic managers have to ensure that the benefits of the speed limit exceed any disbenefits, acknowledging that quality of life criteria generally cannot be easily assessed in monetary terms. To overcome this problem, the Department has prescribed that Roads Service Traffic Managers should have regard for the following considerations:-

- Collision and casualty savings.
- Traffic flow and emissions.
- Journey times for motorised traffic
- Journey-time reliability.
- Environmental impact, including air quality and emissions.
- Level of public anxiety.
- Level of severance by fast-moving traffic.
- Conditions and facilities for vulnerable road users.
- Cost of associated engineering or other physical measures and their maintenance.
- cost and visual impact of signing and possible environmental impact of engineering or other physical measures and
- Cost of enforcement.

With regard to the impact of speed limits upon the environment to include air quality and emissions, it should be noted that Part III of the Environment (Northern Ireland) Order 2002, places a statutory duty upon district councils to periodically review air quality within their areas in order to determine whether national air quality standards and objectives are being achieved, or are likely to be achieved within prescribed periods.

Where the district council determines that air quality standards or objectives are not being achieved, or are unlikely to be achieved within a relevant period, then the district council is required to designate an air quality management area covering, as a minimum, the geographical extent of the exceedence and then prepare a written action plan for exercise by the council, in pursuit of the air quality standards and objectives within the designated area.

The district council is also required to provide the air quality action plan to all relevant authorities who are subsequently required to submit additional actions within their remit in pursuit of the air quality standards and objectives. The Department for Regional Development is prescribed as a relevant authority within the Air Quality Regulations (Northern Ireland) 2003.

Within Belfast, the Council has designated four air quality management areas for nitrogen dioxide and particulate matter, principally associated with road transport emissions. Section 3 of Volume 11 of the Highways Agency Design Manual for Roads and Bridges (February 2009) relating to environmental assessment techniques highlights the impact of vehicle speed upon ambient air pollutant emissions. The calibration graphs indicate that emissions of hydrocarbons and carbon monoxide both rise sharply at slower speeds whereas emissions of nitrogen oxides and particulate material tend to increase at higher speeds.

Therefore, although the Department's draft policy document states that lower speeds benefit all urban road users, there may in fact be a detrimental impact from the increased hydrocarbon and carbon monoxide emissions upon residents living adjacent to a road where for example, a 20 mph speed limit has been introduced. Increasing urban speed limits to 50 mph, as applied to sections of the A12 Westlink, will have the impact of generating increased ambient particulate and nitrogen oxide emissions.

Similarly, with regard to noise emissions, it is acknowledged that the noise arising from road traffic has two main components. The first component is generated by a vehicle's mechanical components including the engine, exhaust and transmission and is the dominant source of noise at low speeds, or in a low gear. The second component of traffic noise is generated by the interaction of tyres with the road surface and tends to be the dominant noise source when traffic is freely flowing at moderate to high speeds. Therefore, the choice of speed limit has the capacity to influence the noise level to which pedestrians and residents living adjacent to roads are exposed.

Conclusions

In summary, it is unclear from the structure of the Department's Policy document how additional criteria should be treated in establishing a speed limit and what significance additional criteria will have in the overall process. Moreover, given the local authority statutory obligations regarding air quality management, etc. it is unclear what weight the Department will give to local authority views prior to establishing speed limits, particularly in urban locations where air quality management areas may already have been or are about to be declared.

The importance of roads and their operation in the local environment contributes to the potential for modification or management to make a positive contribution to local communities beyond the purely road safety benefits. Therefore, in developing a new policy for setting local speed limits, the Department for Regional Development Roads Service is encouraged to undertake early formal engagement in the consideration of changes to speed limits and road geometry in order to afford the Council adequate time to reflect its interests from an operational, environmental and community perspective. This approach would maximise the potential for proposals to make a positive contribution to broader regeneration agendas and enhance community well being.

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