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Speed Limit Circular Consultation Manager Road User Licensing Insurance and Safety Division Zone 3/19 Department for Transport Great Minster House 33 Horseferry Road London SW1P 4DR

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Dear Sir/Madam

## Consultation on revision of DfT's speed limit circular

The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation's green treasures.

This letter sets out our response to Q5 of the consultation document. Our comments relate to Section 7 on Rural Speed Management particularly paragraphs 116-118 as this is the part of the document of most relevance to National Parks.

National Parks are our finest landscapes with the highest level of protection. Their statutory purposes are to conserve and enhance wildlife, cultural heritage and natural beauty, and to promote opportunities for public enjoyment and understanding of their special qualities. For over 75 years the Campaign for National Parks has been working to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.

National Parks contribute significantly to the well-being of the nation, by providing safe, attractive, healthy places for active travel and recreation. They also play a vital role in sustainable development through protection of the landscape, wildlife and key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change. As well as being inspiring places for people to enjoy and improve their health and well-being, National Parks make a significant contribution to the economy through tourism, farming, and other related businesses.

We are keen to see improved access to, from and within National Parks, particularly by sustainable modes of transport so we welcome any measures aimed at encouraging walking and cycling. As speeding traffic can act as a

significant deterrent to walking, cycling and horse-riding, particularly on narrow rural roads, we welcome the proposed flexibility to allow local highway authorities to introduce reduced speed limits on appropriate networks of minor rural roads in National Parks, AONBs and other rural areas.

In addition to the increased risk of collision for other road users, road traffic travelling at excessive speed can have a number of other negative impacts in National Parks and other rural areas, such as:

- Increased noise intrusion for residents and visitors
- Increased risk of injury and death for wildlife and livestock
- Increased risk of damage to verges and hedges as a result of air and water displacement with resulting disbenefits for biodiversity.

Lower speed limits encourage a more equitable use of road space by reducing the dominance of the car and encouraging more use of the roads by walkers, cyclists and horse-riders.

Given the specific reference to National Parks and AONBs in Section 7, the guidance should refer to local highway authorities liaising closely with National Park Authorities (NPAs) and AONB Units to ensure that the needs of both residents and visitors are taken into account in the setting of rural speed limits and to avoid the use of inappropriate physical measures on rural roads in National Parks which could have a detrimental impact on the visual amenity of these protected landscapes. Engineering solutions such as traffic calming, segregated routes and additional signage are often inappropriate in rural areas, particularly in sensitive locations such as National Parks.

If local highway authorities identify routes in National Parks and AONBs where they feel additional measures are needed to accompany reduced speed limits, they should work closely with the relevant National Park Authority (NPA) or AONB unit, to design traffic calming or other measures that are appropriate to the area's setting. The kind of measures that could be considered include varying verge maintenance, soft landscaping, road surface treatment or planting grass in the middle of the road.

The guidance should also encourage local highway authorities to work with NPAs and AONB units to design appropriate ways of marking the access points to National Parks and AONBs to reinforce a sense of entering an area with a different context for highway use where different rules and priorities apply. This would encourage traffic to travel at reduced speed and encourage greater use of the roads for quiet enjoyment by walkers, cyclists and horse-riders. Such 'entry' treatments would need to be carefully designed to ensure they are appropriate to the location but the kind of measures that might be appropriate would again include varying the road surface or verge maintenance.

In preparing this section of the guidance, the Government should draw on the work on Quiet Lanes by the Countryside Agency and other organisations, such as CPRE (see for example:

<u>www.cpre.org.uk/resources/transport/roads/item/download/378</u>). The Quiet Lanes approach is aimed at providing opportunities for people to cycle, walk and horse ride in a safer environment whilst still protecting the character and tranquillity of country lanes. The Countryside Agency also published general guidance on the design of rural routes and networks.

We would also urge the Government to monitor the impacts of the proposed changes and publish the results of this monitoring in order to identify the extent to which the revised guidance is resulting in the increased introduction of reduced limits on rural roads and to ensure that it does not result in the introduction of inappropriate physical measures in protected landscapes.

We trust that these comments will be helpful in the future development of the revised speed limit circular. We would be pleased to continue working with the Department for Transport and other partners to ensure that the proposals are designed in such a way that they provide improved access to National Parks and do not detract from the attractiveness of these special places. If it would be helpful, we could also provide case studies from areas such as the New Forest National Park where reduced speed limits have already been introduced.

Yours sincerely

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