

[REDACTED]
[REDACTED]
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PRIVATE AND CONFIDENTIAL

Mr S. Milburn
Cambridgeshire and Peterborough Coroner Service
Lawrence Court
Princes Street
Huntingdon
PE29 3PA

Chief Executive's Office

Box ALC2609
New Shire Hall
Emery Crescent
Enterprise Campus
Alconbury Weald
Huntingdon
PE28 4YE

Dear Mr Milburn,

Response to Regulation 28 Report regarding Louis Stephen James THOROLD

Cambridgeshire County Council has considered the Regulation 28 report regarding the tragic circumstances surrounding the death of Louis Thorold and, in particular, the questions regarding the Council's 'Settlement Policy'. Your letter questioned whether the policy had been correctly applied (i.e., whether the location in question should be set at 30mph).

Since the collision, the County Council, in collaboration with Cambridgeshire Constabulary and developers Urban and Civic, have implemented a reduced speed limit in this area to 40mph, and has overseen the delivery of improvements associated with the Waterbeach New Town development, including a pedestrian crossing, and enhanced walking and cycling provision on the A10. A separate note was provided to the inquest outlining these changes.

Implementing Safe Speeds is a key pillar of the approach taken by the Cambridgeshire and Peterborough Vision Zero Partnership, of which the County Council is a member. The Partnership has developed a Speed Strategy, which alongside wider guidance and policies, assists in identifying the most appropriate speed for any given route¹.

This letter sets out the rationale for the current 40mph speed limit at Car Dyke Road. This rationale is informed by national and local policy and guidance.

However, the County Council and the Cambridgeshire and Peterborough Combined Authority (CPCA) are presently developing an Outline Business Case to implement strategic enhancements of the A10 corridor. Route safety is a key consideration in the development of the business case. In July 2023 the officer Project Board confirmed that the following four packages should be developed within the Outline Business Case:

¹ [Vision Zero Speed Strategy](#)

- Package 2b: Online dualling between the A14 and Waterbeach
- Package 3b: Dualling between A14 and Ely (without the Waterbeach Bypass)
- Package 4: Offline dualling between the A14 and Waterbeach with a single carriageway route to Ely
- Package 7: focuses on public transport, and includes the Stretham Park and Ride

Currently, the packages are only at concept stage, so the specific improvements are yet to be designed. However, by managing both the strategic and local movements through the A10 corridor using proposed infrastructure including dualling, junction improvements and active travel measures the packages are being designed to improve road safety. For example, by addressing the current congestion issues shunt type collisions and those associated with turning movements will be addressed. The current timeline is that the Outline Business Case, which will include the results of stakeholder engagement and two periods of statutory consultation, will be completed in summer 2024 with a specific package of improvements identified for further development subject to further funding.

Speed / Settlement Policy

The Regulation 28 report refers to the County Council speed policy, with respect to settlements. This policy states:

The County Council will work towards the introduction of a 30mph speed limit in the developed parts of all settlements in the County where appropriate in relation to the nature of the street frontage, activity, environment, and density. Where suitable and affordable, complementary features may be required to encourage drivers to travel at an appropriate speed. Each location will be considered on its own merit.

For speed limit purposes the following definitions will apply:

- I. A settlement will be '20 properties fronting onto a length of public highway over a distance of 600m'.*
- II. The extent of a settlement will be 'The point at which full frontage development begins', or 'at the first property fronting a road entering a settlement, on which there is at least 3 properties/100 metre length of road, prior to the point at which full frontage development begins'.*

First, it is important to note that speeds are not informed by a single, blanket policy. The latest policy with regards to settlements, as set out above, does highlight that there are other considerations, primarily relating to the nature of the route in terms of physical characteristics and demand.

The route at Car Dyke Road does not present as a logical 30mph, as it takes the form of a primary road, and the surrounding land use context is not significantly developed.

Whilst we recognise the number of frontages over the extended length of the route, it cannot be considered as 'full frontage' development in this location. The properties are set back from the road, in some cases not visible from the road and they are well spaced out. This section does not, therefore, meet the criteria to be classed as a settlement.

National Speed Guidance

The County Council's speed limit policy is based upon the DfT Circular 1/13, Setting Local Speed Limits and gives characteristics of a road together with the appropriate speed limit. The table below sets out the DfT Speed limits for single carriageway roads with a predominant motor traffic flow function, such as the A10.

Speed limits outside settlements

Typical characteristics for speed limits in rural areas outside settlements are shown in the table below:

Speed limit (Mph)	Upper tier (Roads with predominant traffic flow function)	Lower tier (Roads with important access and recreational function)
60	Recommended for most high quality strategic A and B roads with few bends, junctions or accesses	Recommended only for the best quality C and Unclassified roads with a mixed (i.e. partial traffic flow) function with few bends, junctions or accesses. In the longer term, these roads should be assessed against upper tier criteria.
50	Should be considered for lower quality A and B roads, which may have a relatively high number of bends, junctions or accesses. Can also be considered where mean speeds are below 50 mph, so lower limit does not interfere with traffic flow.	Should be considered for lower quality C and Unclassified roads with a mixed function where there are a relatively high number of bends, junctions or accesses
40	Should be considered where there is a high number of bends, junctions or accesses, substantial development, where there is a strong environmental or landscape reason, or where there are considerable numbers of vulnerable road users.	Should be considered for roads with a predominantly local, access or recreational function, or if it forms part of a recommended route for vulnerable road users.

There are safety implications with installing an artificially low speed limit. Speed limits should be easy to determine and should encourage self-compliance, i.e., the visual clues should tell a driver what the appropriate speed is, and it will feel natural as they are driving.

Changing the speed limit and introducing nothing but a change in signage is very unlikely to ensure driver compliance on its own. If all speed limit signage were taken away, the driver should instinctively know what the speed limit is from the environment: a driver will choose different speeds for a rural road through open countryside and a built-up road through a town centre.

The A10 is a primary route and was designed and built as a national speed limit road. There are some junctions, accesses, and bends. Where a speed limit is set below the natural limit, compliance is likely to be low unless drivers can see the reason for the reduced limit. Compliance with the previous 50mph speed limit was good. Since the reduction in speed limit to 40mph the compliance is low, with a vehicle average speed being recorded as 47mph.

Department for Transport Circular 1/13 states that speed limits should not be used to attempt to solve the problem of isolated hazards such as a single road junction or reduced forward visibility (e.g., at a bend).

Cambridgeshire County Council has sought the view from the police regarding safe speeds in this location. Cambridgeshire Constabulary does not support a reduction in the speed limit to 30mph, commenting that:

“whilst the circumstances surrounding the fatality were tragic, it was not speed related and a change in speed limit would be unlikely to have changed the outcome. The collision history at the location prior to and after the revised speed limit of 40mph was

*put in place was benign. There is no evidence to suggest this location would be a cause for focus for road safety measures’.*²

Data

The current speed limit is 40mph at the location. A one-week speed survey was conducted between Tuesday 19th and Monday 25th September 2023 using automatic traffic counting equipment. This is the preferred method of gathering speed data as drivers are less inclined to react to the presence of automatic counters unlike speed detection guns which can cause alarm and result in drivers braking.

During the survey period 92,889 vehicle movements were recorded. The data showed that there is already a lack of compliance under the existing 40mph limit (52.5mph average velocity for the first 85% of vehicles). The average speed recorded across the one-week period was 44.1mph. It should be noted that this is an all-day average which includes peak times when average speeds are likely to be reduced due to the high volume of traffic. The lowest average speed recorded during the sample period was 31mph which occurred during peak flow on Monday and Tuesday between 16.00 and 17.00 hours. Whilst the highest average speed was 57mph on Thursday between 03.00 and 04.00 hours. It is also noted that the average daily speed peaks at 47 and 48 mph for Saturday and Sunday respectively, indicating that speeds are likely to be higher at weekends.

Taking all of this data into consideration, a further speed limit reduction would be unlikely to be adhered to under the current road and development environment.

Summary

Cambridgeshire County Council is committed to reducing Deaths and Injuries on all of our roads for all road user types.

We recognise Safe Speeds as a fundamental pillar of the Safe Systems approach endorsed by the County Council and its Vision Zero partners.

At the present time, based on (i) the nature of the route, (ii) observed vehicle speeds, (iii) national and local policies and (iv) comments from Cambridgeshire Police support, we do not propose to reduce the speed further.

However, speeds on the A10 will remain under review, and road safety forms a key component of the A10 Outline Business Case (due to report in Summer 2024), which has potential to change the physical nature of the route.

As part of the agreed planning mitigated for the Waterbeach New Town, a range of measures have been secured to provide enhanced services and facilities for non-motorised road users, including a railway station, off-road walking and cycling and equestrian routes, and bus services. Furthermore, with the Greater Cambridge Partnership, we are developing segregated mass transit and adjacent non-motorised routes which will contribute to the safety and sustainability of the network in the area.

² [REDACTED] – Cambridgeshire Constabulary Traffic Management Officer

Yours sincerely,




Chief Executive