

The Change.org petition to oppose the Welsh Government national default 20mph limit misinforms to the extent that it misreads the Welsh Government plans and the ability of local highway authorities to set local exceptions. In this and many other inaccuracies it is therefore extremely limited in its assessment of public support for opposing the national default 20mph limit with exceptions that has been set in Wales.

Petition statement	Critique
The Welsh Government has plans to change every 30mph road in Wales to 20mph and we here in Buckley are one of 8 unlucky towns whose councils decided to sell them down the river and bid to be the "pilot towns".	<p>It did not have such plans. The statutory Instrument has now been approved by Senedd to set a national 20mph default limit for restricted (lit) roads and will come into force on 17th September 2023. Local highway authorities are already empowered to make exceptions to the national default limit.</p> <p>It was Flintshire County Council that chose Buckley as one of the communities to pilot the process of doing this. It was Flintshire County Council that decided which roads to make 20mph. However, because this was a pilot into wide-area 20mph limits, Welsh Government did set criteria for the extent of the limits when inviting bids from authorities to become a pilot.</p>
It is causing chaos, people avoiding the area and people having to take new routes.	There is no "chaos" and it is disingenuous to suggest that there is. No roads have been closed. No-one is being "forced" to take new routes.
Many of these roads aren't suitable for a 20mph speed limit. They are busy access roads on steep hills. The lorries are struggling to get up the hills in such a low gear and sticking to such a low speed downhill is hard on the brakes. This is doing nothing to reduce emissions, instead there will be more pollution from more cars struggling in a lower gear for a longer time.	<p>There is no evidence for this. The amount of energy required to ascend a hill or to dissipate when descending a hill is not dependent upon the speed. This is associated with the potential energy change which is based on mass times altitude difference. Liverpool Road has a maximum gradient of 6% and is not particularly "steep". 20mph limits have been applied to many roads across the UK with similar or steeper gradients.</p> <p>There is no evidence that using a lower gear increases emissions. Engine management systems will meter the fuel injected according to the load on the engine rather than the revs.</p>
Despite the Welsh Government having spent nearly £30,000 on signage alone, these signs have not been thought through, there are completely unnecessary signs at the start of 50m long, single track, unadopted and untarmaced roads that you physically couldn't drive down over 10mph, and yet there is	Much of the signage is required because the national speed limit is currently 30mph. Once this is changed then repeater signs will no longer be required. The boundary signs for unadopted roads will also not be required. Hence any such issue has no bearing on setting a national 20mph limit.

completely inadequate signage at the start and finish point on the previously 30mph main roads - people are confused and are spending so much time looking at their speedometers that it is actually a cause of dangerous driving!	There is no evidence that 20mph limits cause dangerous driving due to drivers looking at their speedometers. There is, by contrast, robust evidence that collisions decrease.
It has caused bus delays; making environmental commuting more inefficient than it was before. It is also going to affect property values on specific routes and traffic to be diverted into more residential areas to bypass this limit.	<p>There is no evidence for this. Buses have low average speeds anyway due to stopping for bus stops. Capping their speed at 20mph in urban/village roads make no significant change in journey times. However, it does enable a stopped bus to pull out more easily into a 20mph stream of traffic rather than one at 30mph.</p> <p>Note that the amount of energy for a stopped bus to reach 30mph is 2.25 that required to reach 20mph. This provides a reduced fuel consumption for buses and corresponding monetary benefit.</p>
There have not been high occurrence rates of road traffic accidents, deaths or injuries on roads in and around Buckley that require a change to our regular 30mph limit on these roads. It's entirely unjustified and was not supported by the community making it a non-democratic change. The community already support the 20mph zones outside schools and other significant areas and would fully support keeping these in place.	<p>There is evidence that community wide 20mph limits reduce casualties by between 20% and 40%.</p> <p>There is evidence that having 20mph just outside schools is not effective in improving road safety. It endorses increasing in speed by 50% immediately after the school entrance where many children are still walking and cycling to school. The aim of a community-wide 20mph limit is to provide child protection on their whole journey walking or cycling to and from school, and when making other journeys around their community.</p> <p>Note that the AA found that only 20% of child casualties occur on the journey to/from school. 80% are at other times.</p>
Flintshire residents were not part of the closed Welsh Government survey, and we feel the questions asked were completely misleading. We all agree slower driving is appropriate in specific areas (schools, hospitals, around shops) but nobody supports a blanket 20mph zone across all our roads. It doesn't make any sense and is leading to significant inconvenience, distress, and dangerous road conditions. We ask that more research is conducted, and a wider survey completed with more appropriate questions prior to this pilot taking place in Buckley. No research indicates that a 20mph limit will reduce accidents in Wales.	<p>The claim that "nobody supports a blanket 20mph zone across all our roads" is misleading as there is no proposal for a "blanket 20mph zone".</p> <p>The law across the UK specifically allows highway authorities (like FCC) to justify and set exceptions. This is the basis on which the current 20mph limits were set in Buckley before the national 20mph limit becomes effective. Its how highway authorities set 40mph limits on restricted (lit) roads. So "all our roads" is not a Welsh Government plan.</p>

	<p>Already 20 million across the UK live in villages, town and cities where 20mph is set for most roads. Typical levels of support are 60-80% with support increasing after implementation.</p> <p>The information in the petition is therefore causing people to oppose a fictitious plan which is entirely different from that which the Welsh Government is implementing.</p> <p>The idea that “no research indicates that a 20mph limit will reduce casualties in Wales” is simply not true. There is ample research from WHO and so many organisations that speed limits where roads are shared between motor vehicles and vulnerable road users (pedestrians and cyclists) should be no more than 30km/h or 20mph.</p> <p>The 20mph national default limit is fully supported by Public Health Wales, The Institute of Welsh Affairs, The Future Generations Commission. That is in Wales alone. Internationally we could add WHO, OECD, The Global Alliance of Road Safety NGOs and many more organisations.</p> <p>Peer reviewed academic studies and monitoring data from similar schemes carried out by local authorities (such as Bristol, Scottish Borders, Warrington, Edinburgh, Calderdale and many others) show a 20-40% reduction in casualties when community-wide 20mph speed limits are set. These are much more effective than the more limited 20mph areas which were analysed in the DfT research of 2018 prepared by Atkins.</p>
<p>As you’ll know, setting speed limits should be “evidence-led and self-explaining”, according to the Department for Transport. Speed limits “should also be seen by drivers as the maximum speed rather than as a target speed at which to drive irrespective of conditions”. The evidence used in the Welsh 20mph Task Force Group Final Report appears to be based mostly on dangerously out of date research and statistics. Using a reference from 1991 to back up this statement “Child pedestrian deaths in deprived neighbourhoods are over four times those in affluent neighbourhoods.” is appallingly bad practice. If the information is</p>	<p>The DfT guidance on setting speed local limits does not apply in Wales, and the current Welsh equivalent is in the process of being revised to reflect the new 20mph urban default limit. There will be no requirement for 20mph limits in Wales to be self-enforcing, just as there is presently no requirement for 30mph limits to be self-enforcing.</p> <p>Chapter 3 of the Task Force report summarises the evidence for the change in the limit and is based on the most recent data then available, including 2018 casualty statistics and a 2018 academic evaluation of the effects of the Bristol</p>

<p>older than 5 years it's no longer current or relevant and new research studies should have been completed prior to the scheme being considered.</p>	<p>20mph limit. Older studies were also cited but there is no reason to consider their conclusions to be invalid. Moreover, scanning for new evidence occurs each month to update the latest science and this consistently endorses the benefits of the deployment of 20mph limits.</p>
<p>According to national statistics, there is one death per 20,000 cars on the road, making the UK's road safety rating one of the highest in the world. Therefore, it is shocking that the Welsh Government would be so out of date that it would bring in a limit that was last seen in Law in 1903 (Motor Car Act). This law was scrapped when cars were made more safely with the current 30mph limit taking effect in 1934. Buckley is not alone in not wanting the 20mph limit. Motoring organisations the RAC and the AA have expressed support for 20mph limits outside schools, but completely oppose a blanket change from 30 to 20 based on their own research.</p>	<p>Road safety casualties in UK have flat-lined for the past decade. In 2020 at the 3rd Ministerial Conference on road safety ministers from around the world endorsed the Stockholm Declaration calling for national governments to:</p> <p>“Focus on speed management, including the strengthening of law enforcement to prevent speeding and mandate a maximum road travel speed limit of 30 km/h in areas where vulnerable road users and vehicles mix in a frequent and planned manner, except where strong evidence exists that higher speeds are safe, noting that efforts to reduce speed will have a beneficial impact on air quality and climate change as well as being vital to reduce road traffic deaths and injuries;”</p> <p>Far from being “out of date”, default 20mph limits are global best practice and the Welsh Government should be applauded for its actions.</p> <p>As stated previously there is no “blanket change”, local highway authorities have the responsibility to set local exceptions where deemed appropriate.</p>
<p>Improved road engineering, better cars and better brakes have brought about a significant decrease in deaths since 1934. These improvements have decreased accidents, not speed limits. The speed limit change in Buckley has caused more accidents in the 3 days it has been live than we would usually see in a year, including a child being hit on Bryn Road, now a 20mph. People are now spending more time looking at their speedometers than they are on the road ahead. This scheme is entirely counterproductive. The only road in Buckley to have a RTA resulting in a fatality in the last 10 years is one of only 3 roads to have had the speed limit left at 30mph.</p>	<p>There is substantial evidence that reducing speed reduces casualties. To say otherwise is both manifestly untrue and misinforms.</p> <p>There is no evidence that the change in speed limit has “caused” any casualties in Buckley.</p> <p>The idea that drivers cannot drive at 20mph without constantly looking at their speedometers is misleading. This is often quoted by opposers of 20mph limits but has no basis. Of course, some drivers will find 20mph a slower speed than they normally drive, but this is entirely expected and the reason for setting the limit. It also provides wider driver fields of vision, reduces stopping time and distance, reduces pollution and noise, as well as making</p>

	<p>streets more comfortable for those walking and cycling. Drivers quickly become used to driving at this speed and can judge when they are exceeding it without constantly looking at their speedometer.</p> <p>Any review of casualties in the last 3 years and using that as a basis for including or excepting a road rests entirely with Flintshire County Council in Buckley and the relevant highway authority throughout Wales.</p>
<p>We also feel this change is unlawful. Section 82(1)(a) (of the Road Traffic Regulation Act 1984 (RTA 1984)) defines a restricted road in England and Wales as a road which is provided with "a system of street lighting furnished by means of lamps placed not more than 200 yards apart". Section 81 specifically makes it an offence for a person to drive a motor vehicle at a speed of more than 30 mph on a restricted road. Therefore, whilst Wales are now able to set speed limits, what law change has taken place to make this 20mph zone legally enforceable in courts?</p>	<p>This is entirely wrong. The Wales Act 2017 specifically gave Welsh Ministers the ability to set national speed limits with affirmative approval by Senedd. This changes the speed limit for restricted roads to 20mph. Local highway authorities may under existing powers by means of a Traffic Regulation Order de-restrict a road and change its speed limit.</p>
<p>The signage is also not clear and given this is a brand new change, we would expect forbearance for a period of 6-12 months for residents to get used to a whole new way of driving. Especially as we live on the border of England where more sensible road speed limits currently apply meaning residents may be even more confused.</p>	<p>Buckley is near the border with England where Cheshire West and Chester Council have already set a 20mph limit for most residential roads.</p> <p>Discussions are underway with all English authorities bordering Wales on creating consistent 20mph limits where settlements straddle the border.</p> <p>Buckley residents should have no difficulty recognizing that "if they are in Wales the urban/village limit unless signed otherwise will be 20mph".</p>
<p>One of the biggest issues we have had with the scheme in Buckley is that Phase 2 was also not consulted on. Flintshire County Council pushed it through, opening the consultation period on the 17th December and closing it on the 7th January WITHOUT TELLING ANYONE. The county councillors didn't know. The town councillors didn't know. Because no one knew, no one could object. Therefore the main access roads, through roads and main commuter</p>	<p>Any Traffic Regulation Order cannot be issued without the knowledge of councilors. Hence this statement is incorrect.</p> <p>Regardless of the merits or demerits of the method of implementation in Buckley, this has no bearing on the national change in speed limit which has been debated and supported in Senedd since 2020, and for which the enabling legislation has now been passed.</p>

<p>routes were all lowered to 20mph AGAINST the wishes of the town council.</p>	<p>It is Flintshire County Council that has the responsibility for setting local speed limits. How it interacts with the Buckley Town Council has no bearing on the case for a national default 20mph limit.</p> <p>Welsh Government is conducting a great deal of liaison with all Welsh Local Authorities on this issue to ensure that everyone is aware of the change in national speed limit and the ability of local authorities to justify and make exceptions.</p>
<p>People were also voting in favour of improved links between the primary schools and cycle paths to allow more children to be able to walk and cycle to school safely, thus also reducing congestion and emissions - this has not happened at all. Yet the Welsh Government are hell bent on "inviting the community into the roadscape" a line which no one has been able to give an explanation to as yet. The community has the pavements. The road users should have the roadscape!</p>	<p>Of course, such links are beneficial. But the idea that this policy newly "invites the community into the road space" is false. The community, including pedestrians and cyclists, have always had access to the road space. It is used to walk and cycle in whether using roads or crossing them. The idea that segregated cycle and pedestrian paths can get from every house to every school in Buckley without crossing a road is wholly unrealistic.</p> <p>Pedestrians and cyclists are road users and those road users in motors have a duty of care towards them when sharing that space.</p>
<p>We are also looking to seek legal support on the enforceability of this limit given it's not UK Law but Devolved law. For a town on the Wales/England border, this is very confusing and dangerous.</p>	<p>All speed limits are entirely enforceable under the Road Traffic Act as long as the appropriate process has been followed and signed accordingly. Both of these will be done for the national 20mph limit. It is neither confusing nor dangerous.</p>
<p>Finally, the people of Buckley are absolutely disgusted with their MS, Jack Sargeant's, repeated attempts to abdicate from responsibility of this scheme. This is a Welsh Government scheme, Jack is our elected Member of the Senedd, elected to represent the people of Buckley and to be their voice to feed back to the Welsh Government on issues that affect them. His copy-pasted responses denying any responsibility and offering no help or support to his electorate have been brief and disappointing. The people of Buckley already feel deeply let down by the Welsh Government in all it's guises, we have seen no financial investment to the town centre, no youth services and despite all the lip service and fanfare, still no mobile bank.</p>	<p>The responsibility for the exceptions lies with Flintshire County Council . Hence this has little bearing on the national scheme which will not take the same process as the Buckley pilot implemented by Flintshire County Council.</p>
<p>A poll was conducted in the Facebook group over the first 3 days after the scheme went live.</p>	<p>This was a poll of members of a Facebook group set up to oppose the 20mph</p>

<p>The results were 70% of respondents were in favour of returning the 30mph speed limit to the main access roads in and out of Buckley and the surrounding areas, such as Mold Road, Liverpool Road, Church Road and Bannel Lane and keeping the 20mph limit only outside schools and in heavily built up residential estates such as St. Matthew's Park. 10% of people want the 20mph to stay outside schools only and almost 20% of people wanted to scrap the scheme entirely. Just two people, in a town of 21,000, were in favour of the scheme as it stands.</p>	<p>implementation. It is therefore self-selective and it should come as no surprise that the %ages showed the support they did. Once again it has no relevance to the national default 20mph plan which will allow local highway authorities to make the case for excepting any particular roads.</p>
<p>Calling it a "pilot scheme" is truly insulting when the government has said "20mph is a legislative change across the nation" coming into force 2023. A Pilot is done as an experiment or test, evaluating the results before making plans to implement more widely.</p> <p>They made plans to implement it nationwide before the pilot was even in place.</p>	<p>What it was "piloting" was the implementation process in various communities. It was not piloting the plan to set a national limit. This has already been subject to considerable research, justification and now Senedd approval.</p>
<p>The Task Force Group Report says that the Welsh Government should commission an independent study, five years after the implementation of the national default 20mph speed limit for restricted roads, to provide an assessment of the programme both in terms of outcomes and process. It should be recognised that the programme is an internationally-important intervention in generating data, not just for Wales.</p>	<p>Indeed. With the global acceptance of 20mph and 30km/h limits being best practice it is entirely appropriate for Welsh Government to assess the benefits of its implementation and publish this for the global road safety community. This is commonly done where countries are taking a lead in implementing what is considered best practice.</p>
<p>5 years is NOT an experiment. It is not a pilot. It is not temporary. Not when the Welsh Government is aiming to achieve the following key milestones to enable a 20mph default speed limit on restricted roads to be introduced across Wales by April 2023:</p> <ul style="list-style-type: none"> • Publication of Task Force Report – July 2020 • Ministerial Statement giving the intention to proceed & Plenary Vote to take forward the legislation – July 2020 • Pass Statutory Instrument – October 2021 	<p>Of course. It was never intended to be an "experiment or temporary".</p> <p>Most of the milestones have already been achieved including the Statutory Instrument which was passed on 12th July 2022 with commencement on 17th Sept 2023.</p>

<ul style="list-style-type: none"> • Commencement of Statutory Instrument – April 2023 	
<p>It really is a whitewash and NOT what people were consulted on.</p> <p>We tried emailing our town councillors, they pleaded ignorance. We tried emailing our county councillors who, despite being paid a wage to represent us, also pleaded ignorance. We emailed our MS and his response was to go to the papers with a threat that he has asked for more police involvement in enforcement but completely evaded the issue of it being implemented incorrectly and unfairly.</p>	<p>If opposers had been able to engage constructively with elected representative then this may have helped them understand and not misinterpret what was being planned.</p> <p>It has been clear since 2020 that the Welsh Government was planning a change to the national speed limit and this was supported in Senedd at the end of the Task Force stage, prior to the pilots, by members of Welsh Labour, Plaid Cymru, Welsh Conservatives and Welsh Liberal-Democrats.</p>
<p>We tried to set up a Senedd Petition and had it declined 4 times on the basis that another petition for the same issue was already running - it was not, that one was from South Wales and had opened and closed the previous October.</p>	<p>Petitions are subject to both being within the jurisdiction of the Petitions Committee and based on fact.</p> <p>The first petition submitted was:-</p> <p>Stop the Welsh Government introducing a blanket 20mph speed limit</p> <p>Speed limits should be set by local authorities and should be only 20mph where necessary.</p> <p>It completed in 25/4 22 and gained 161 signatures.</p> <p>Note that requiring local authorities to set all speed limits would be a hugely cumbersome administrative process.</p> <p>The response from the Petitions Committee was ;</p> <p><i>The Committee considered the petition and noted that four other petitions had been submitted to the Committee around this issue. The Committee noted that the Welsh Government have clarified the exception process available for local authority to pursue if 20mph is considered inappropriate for a particular road. In light of the fact that the exception process provides a route forward for the petitioners to raise their concerns with their local authority who can review the decision, the Committee</i></p>

	<p><i>agreed close the petition and thank the petitioner.</i></p> <p>This should have alerted the petitioner to the folly of constructing a petition that misrepresents government plans. It is noticeable that all of the petitions on this subject of opposing the national limit have been poorly put together and misinform anyone looking at the petition. Even if they weren't repeats of the petition with 161 signatures their inaccuracy and inattention to detail would probably have led the Petitions Committee no alternative other than to ignore them.</p>
<p>As our MS Jack Sargent is the Chair of the Petitions Committee we would have appreciated his being impartial in the approval of our petition so that more people can make their voice heard to the Senedd. But we were not so lucky. They informed us they would not approve ANY petitions regarding this subject and we could feel free to set up a Change.org petition although it would have no bearing in the Senedd unless enough negative media attention was drawn to it.</p>	<p>It is within the remit of the Petitions Committee to not approve repeat petitions. We note that Change.org make no attempt to test the rigour or veracity of petitions. Hence such a petition would be an ideal instrument for spreading misinformation and untruths which distort the whole issue. Equally, it seems difficult to see how such a petition as this can hold any weight in discussing or considering the matter when faced with all the evidence supporting the wide roll out of 20mph limits and the ability for the local highway authorities to justify and make exceptions.</p>
<p>This is your warning Wales, this scheme is coming for you too. Get familiar with your town councillors NOW. Make them aware of what is coming to your town in the next few weeks and months. If we do not fight it every 30mph road in Wales will be 20mph by April 2023.</p>	<p>Please note that "Town Councilors" have no responsibility for setting local speed limits and exceptions to the national 20mph speed limit being implemented in September 2023 and approved by Senedd.</p> <p>It is highway authority councilors such as those in Flintshire County Council who have such authority. It is entirely within their power to make decisions on whether restricted roads should have a 20mph limit or expect them with one 50% higher.</p> <p>This advice, even from a position of opposing 20mph limits, is inaccurate.</p>

In view of the above criticism of the petition we would suggest that it holds very little weight as an indicator of public opinion.

Rod King MBE

20's Plenty for Us