



## Access to Public Information Response

August 14<sup>th</sup> 2018

### REQUEST UNDER THE CODE OF PRACTICE FOR ACCESS TO PUBLIC INFORMATION

Request sent on August 14<sup>th</sup> 2018:

The Committee for the Environment and Infrastructure has recently released proposals relating to the reduction in speed limits on a number of roads. During a radio interview on 30 July, 2018 the President of the Committee noted that it:

*"... has been quite a colossal piece of work to go over every road ... each road proposed, the staff have spent time there measuring speeds to give us the average speed, the speed of the average driver and the top end speeds ... that is in the documentation which was presented to us at a political level..."*

This information request is in relation to this issue and is a request for the data provided to the Committee when they considered this issue and formulated their proposals, specifically being:

**1a** - a copy of the report(s) provided to the Committee upon which the Committee based its proposals. The report(s) to have names of Civil Servants and their advice or opinions redacted so that the information provided does not fall within exemption 2.4 (2.4 Internal discussion and policy advice).

**1b** - If the above request is refused, a copy of the raw data collected by staff used to inform their report to the Committee.

**2** - in relation to request 1a above, an indication of the quantum of the data, i.e. the volume of traffic measured in order to establish the averages Deputy Brehaut referred to.

**3** - Copy of the evidence presented to the Committee that the reduction in speed limits from 35mph to 25mph will improve road safety and reduce accidents.

States of Guernsey response sent on September 13<sup>th</sup> 2018:

Further to your request made under the Code of Practice on Access to Public Information, please see below and attached for the response from the Committee *for the* Environment & Infrastructure.

The Committee has considered your request but given it has considered a number of reports from officers in relation to developing the speed limit proposals recently put out to public consultation, it would take a disproportionate amount of time and divert officer resources from high priority work streams (e.g. finalising the speed limit decision notice, preparing for Brexit) to redact the reports so that they could be released. As such, we have applied exemption 2.4 (internal discussion and policy advice), which clearly covers all committee papers.

However, as requested please find attached a wide variety of primary data considered by the Committee as part of its deliberations on the proposed speed limits as part of the Integrated Transport Strategy. Please see below for a list explaining the relevant attachments:

- The Island Development Plan is the key document available at <https://www.gov.gg/planningpolicy> sets the basis against which existing speed limits were assessed in the main and local centres. This set the foundation from which the proposed changes were developed;
- Braye Road speed checks; (Volume and speed data recorded from a data collection box placed out in the road)
- Speed limit data (Historical data from a combination of hand held radar surveys, driven surveys and fixed counter surveys)
- Casualty Data (Guernsey Police has not authorised release of this data as it could directly or indirectly release personal data)
- RTC Yearly Stats Comparisons (Note: the UK and Jersey have recorded every individual injured in its statistics, whilst the Guernsey statistics only record a single injury if multiple injuries are sustained in the same collision. As such, the data sets are not directly comparable and the Guernsey data are not an accurate record of the number of casualties injured or killed in RTCs.)
- RTC Stats 13-15 cycles & pedestrians (A list of Road Traffic Collisions for the period 2013 – 2015 involving a pedestrian or cyclist)
- Cost of road accidents (A document showing the financial impacts of road collisions)
- Correspondence data in date order (Road Safety related correspondence received by Traffic and Highway Services from Jan 2014 to mid-March 2018)
- Correspondence data in nature order - (Road Safety related correspondence received by Traffic and Highway Services from Jan 2014 to mid-March 2018)

- Correspondence data in road name order (Road Safety related correspondence received by Traffic and Highway Services from Jan 2014 to mid-March 2018)
- Road Traffic Accident Stats – total score (This map plots injury data based on the scenario of weighting injury data with scores as follows:- Damage Only 1; Minor Injury 3; Serious Injury 6; Fatal 10. Note: The scoring mechanism was illustrative and scores combine two different methods for calculating injury data.)
- Road Traffic Accident Stats (This map plots the number of Road Traffic Collisions taken place in each road. Note: this map was illustrative.)
- Road Traffic Accidents 2013 – 2017 (This spreadsheet lists the current speed limit, road hierarchy type, no of incidents and a scoring mechanism. Note: The scoring mechanism was illustrative and scores combine two different methods for calculating injury data.)

The Committee trusts that you will find this information useful in explaining what local data its members have considered as part of its deliberations on current proposals. We hope the information you were seeking is contained within the documents we have shared with you, however please feel free to contact the Committee at any point if you are seeking clarity or more related information.

We would like to reassure you that the Committee will be producing a comprehensive decision notice setting out the Committee's final decision and referring to all the international evidence as well as summaries of the local feedback from the recent consultation.

#### Request sent on 14<sup>th</sup> September 2018

I refer to the email dated 13 September replying to my information request of 14 August, 2018 and thank you for the response and the provision of the information. Please pass on my thanks to the staff members who were involved in its compilation.

I note however that two of my question were not addressed in the reply, namely questions 2 and 3, being:

2 - In relation to request 1a above, an indication of the quantum of the data, i.e. the volume of traffic measured in order to establish the averages Deputy Brehaut referred to.

3 - Copy of the evidence presented to the Committee that the reduction in speed limits from 35mph to 25mph will improve road safety and reduce accidents.

(Please note that question 2 was asked in the context of Deputy Brehaut's radio comment that " ... each road proposed, the staff have spent time there measuring speeds to give us the average speed".)

Could you advise when I can expect the response in relation to these two questions? With regard to my first question, the Committee has explained that the volume of reports means that it would take a disproportionate amount of time to redact those reports and therefore the Committee has applied exemption 2.4 (internal policy advice). My initial reaction is that I am dissatisfied with the reply.

In order for me to put this decision and reply into context would you provide the following clarification regarding those reports:

1. How many reports did the Committee consider from 1 January 2018 to the date they finalised their proposals?
2. The number of pages in each report, split between the number of pages in the main body of each report and the number of pages of appendices, if any.

#### States of Guernsey response sent on 20<sup>th</sup> September 2018

I am responding to your letter of 14th September and your request for further clarification regarding your Access to Public Information request. I have dealt with the questions in the order in which you raise them in your letter.

#### Question 2

With respect to the quantum of data, i.e. the volume of traffic measured in order to establish the average speeds referred to during the Jenny Kendall-Tobias show on BBC Radio Guernsey, I can advise as follows.

A number of fixed counter speed surveys have been undertaken over the past 12 months. The data recorded assessed the mean average and 85th percentile speeds for in excess of 250,000 vehicle movements. This information was not detailed in the response to your API, with the exception of the Braye Road survey, as the raw data for the other surveys was not presented to the Committee. Officers simply presented the high level summary data.

In addition, reference has also been made to a significant volume of historical traffic speed data undertaken in 2010 as part of the original strategic review of speed limits and which covered some 125 different roads across the Island; using both fixed and hand-held speed recording equipment (as included as an attachment in the previous response to you). Whilst we haven't attempted to calculate the number of vehicles included within these historical surveys, it is likely to have exceeded 500,000 movements based on the number and duration of surveys that are understood to have taken place.

#### Question 3

In terms of the copy of the evidence presented to the Committee that the reduction in speed limits from 35mph to 25mph will improve road safety and reduce accidents, I can

assure you that Officers are currently combining all of the information considered by the Committee in its deliberations into a single Decision Notice so that all members of the community and interested parties can understand the Committee's final decision. The preparation of the Decision Notice has been developed in parallel with the response to your API and it had been intended to issue the Decision Notice prior to the response to the API. Unfortunately, due to staff leave and pressure on resources this has not been possible.

I wish to assure you however that the Decision Notice will clearly set out the evidence that the reduction in speed limits from 35mph to 25 mph will help to improve road safety and reduce the likely number of future accidents and the severity of any injuries sustained as a result of such accidents. In the meantime and prior to the publication of the Decision Notice, please find below a list of some of the international research which the Committee and Integrated Transport Steering Group has had access to and helped informed its consideration of this issue.

Speed management – A road safety manual for decision makers and practitioners WHO, FIA Foundation for the Automobile and Society, World Bank 2008

- Taylor MC et al The effects of drivers' speeds on the frequency of road accidents, Crowthorne UK Transport Research Laboratory Report no 421 2000
- Aarts R Vaa T The handbook of safety measures, Amsterdam, Elsevier 2006
- Reduced Sensitivity to Visual Looming Inflates the Risk Posed by Speeding Vehicles When Children Try to Cross the Road. / Wann, John P.; Poulter, Damian R.; Purcell, Catherine. In: Psychological Science, Vol 22, No. 4, 04.2011, p. 429-434.
- SATRE 3 Report European drivers and road risk: report on principal results France Institut de Recherche sur les Transport et leur Securite, INRETS 2004
- Speed Management. Report of the Transport Research Centre, OECD, 2006
- Howard E Mooren, L Nilsson, G Quimby, A Vadeby Speed Management: A Road Safety Manual for decision makers and practioners WHO/ GRSP 2008
- Global Plan for the Decade of Action for Road Safety 2011-20 WHO: Geneva 2011
- Community Perceptions and Beliefs Regarding Low-Level Speeding and Suggested Solutions, Professor Soames Job, Chika Sakashita, Lori Mooren & Professor Raphael Grezbieta, Transportation Research Board, 2012

### Question 1

I apologise that you are dissatisfied with the response provided to question 1, but in the circumstances the small team working in this area are not only seeking to finalise the Decision Notice, but are also working on a number of other strategic projects, including as you would expect Brexit implications. The Committee considered four reports from officers in 2017 and one report in 2018 in addition to the external reports which members had access to.

With respect to the number of pages in each report, split between the number of pages in the main of body of each report and the number of pages of appendices it is unclear as to what value this answer would provide. On this basis I feel compelled to consider this a frivolous request and apply exemption 2.9. I would hope that that you would accept that it is not the best use of officer time. It is far more productive and valuable for officers to deliver key policy objectives for our community and finalise the Decision Notice as soon as is practicable.

However I would like to extend an invitation to you to come and meet Members and Officers once the Decision Notice is published when it will be possible to have a more productive and fruitful dialogue.