

20mph Default Speed Limit Review of Exceptions

Initial Report

February 2024

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1. Introduction

1.1 Background

- 1.1.1 The introduction of the 20mph default speed limit, which took place on 17th September 2023, is the largest road safety and public health intervention by the Welsh Government directly affecting people across Wales. Its introduction has provoked strong feelings both for and against it and sparked a debate going beyond Wales' borders.
- 1.1.2 Introducing slower speeds in urban areas where people mix with motorised traffic is a recommendation of both the United Nations and the World Health Organisation; and 20mph/30kph speed limits have been introduced in many places across the UK and other European countries for decades now. However, Wales (after Spain) was only the second nation to introduce lower speed limits in settlements across a nation. This has been a momentous and controversial change, and it will take time for people to become accustomed to it. The previous 30mph limit in built up areas was introduced by the Road Traffic Act in 1936.
- 1.1.3 The reduction in the default speed limit for restricted roads¹ in Wales from 30mph to 20mph was achieved through a change to Section 81(1) of the Road Traffic Regulation Act 1984. Although this altered the starting point for setting most speed limits within settlements in Wales, there was no change to the powers of Welsh highway authorities² to set a different speed limit on any road within their jurisdiction. Welsh Government provides non-statutory guidance to support them in exercising these powers, the most recent of which was published in 2009 as Circular 24/2009, Setting Local Speed Limits in Wales.³
- 1.1.4 In November 2022 Welsh Government published an Addendum to Circular 24/2009, entitled 'Setting exceptions to the 20mph default speed limit for restricted roads'⁴. This addressed the then forthcoming law change and provided highway authorities with a framework for making decisions on setting local exceptions to the default 20mph limit for restricted roads (so that the speed limit remained at 30mph). The

¹ A restricted road in Wales is defined in [Section 82 of the Road Traffic Regulation Act 1984](#) as a road with a system of street lighting where lamps are placed not more than 200 yards (183m) apart.

² Welsh Local Authorities and the Welsh Government in respect of the Strategic Road Network

³ [Setting Local Speed Limits in Wales](#)

⁴ [Setting exceptions to the 20mph default speed limit for restricted roads](#)

aim of this document was to provide ‘a methodology to ensure a consistent approach to exceptions across Wales is taken; yet allowing for local factors and circumstances to be taken into account’.

- 1.1.5 The setting of speed limits within settlements is thus a shared responsibility between the Welsh Government and highway authorities – Welsh Government sets the legal and guidance framework within which highway authorities (mainly local authorities) make their decisions on setting local limits.

I.2 This Review

- 1.2.1 Some politicians, bus operators and members of the public have raised concerns about particular main roads that they believe are more suited to having a 30mph limit, but are now 20mph by default; and over an apparent lack of consistency across Wales in the decisions on exceptions made by highway authorities.

- 1.2.2 The purpose of this review is to consider these concerns, based on evidence and the views of stakeholders, and provide Welsh Government with a set of recommendations to address any issues found.

- 1.2.3 The Terms of Reference for the review are contained in Appendix A. The background to and details of the review were set out by the Deputy Minister for Climate Change in a letter to local authorities issued on 23 January 2024, which is included in Appendix B.

- 1.2.4 The Review Team will, *inter alia*:

- Gain an understanding of the application of the Exceptions Guidance in different parts of Wales and any problems that may have been encountered
- Engage with local authority cabinet members and other key stakeholders, representing a wide range of interests
- Offer support to local authorities where they are keen to rapidly consider changes to speed limits in settlements
- Prepare a final report accompanied by draft updated guidance on exceptions.

- 1.2.5 An online petition to the Senedd calling for the law change to be rescinded has now attracted some 470,000 signatures. However, consideration of a further law change is beyond the scope of this review, which is concerned only with how the Welsh Government’s guidance on exceptions has been implemented by highway authorities and whether it needs amending.

- 1.2.6 This review is also not an evaluation of the success or otherwise of the change in the default speed limit and the roll-out of extensive 20mph limits. It is intended that the evaluation of the short and long-term outcomes of the policy will be designed and commissioned by the Knowledge and Analytical Services section of Welsh Government.
- 1.2.7 This review is being carried out by a team consisting of (in alphabetical order) Peter Jones, Professor of Transport and Sustainable Development at University College London; Phil Jones, Chair of the Welsh Government's 20mph Task Force Group; and Kaarina Ruta, Transport Adviser at the WLGA. The draft conclusions and recommendations of this initial report were shared with a Review Group, consisting of Welsh Government and highway authority officials and other experts and partners, who provided valuable scrutiny and feedback.
- 1.2.8 This initial report of early findings has been prepared in a short period of time, beginning in mid-January 2024. It is based on a review of the evidence available as at the end of January 2024, including discussions with officers of highway authorities who were responsible for advising elected members on the setting of exceptions.
- 1.2.9 Following its publication, the Review Team will continue to gather information, including views of other stakeholders with an interest in the setting of speed limits within settlements. Further details of this call for evidence are given in Section 5 below.
- 1.2.10 It is intended that the final report of the Review Team and draft updated guidance will be presented to the Welsh Government later this year. The updated guidance will seek to align with the forthcoming Setting Local Speed Limits in Wales guidance.

2. The Exceptions Process and Guidance

1.3 Introduction

1.3.1 To assist stakeholders in giving their views on the exceptions process (see Section 5), this section of the report describes how the concept of exceptions was established, and the development and content of the Welsh Government's current guidance to highway authorities.

1.4 Task Force Stage – 2019/2020

1.4.1 The 20mph Task Force was set up in May 2019 and reported in July 2020.⁵ It was recognised in the report that it would not be appropriate to place a speed limit of 20mph on all restricted 30mph roads, noting that '*On well-engineered routes that are principal corridors for movement, where there is little frontage development or community activity and where pedestrians and cyclists do not need to mix with motor vehicles it will often be appropriate to retain the existing limit.*'

1.4.2 A sub-group of the Task Force had considered how exceptions should be decided, alongside engineering and enforcement issues. The recommended process involved two principal stages:

- Definition of the 'Principal Urban Network'
- Assessment of whether a 30 or 20 limit should apply to those particular roads.

1.4.3 This would allow highway authorities to identify roads which were not important traffic routes (i.e. including all minor residential roads) and should therefore normally have a 20mph limit. The focus of attention would only need to be on the minority of roads in Wales that have a more important traffic function.

1.4.4 The Task Force did not recommend that all 'arterial' or 'main' roads should remain at 30mph. This was because these main roads have an important movement function not only for motorised vehicles but pedestrians and cyclists too. A substantial proportion of collisions and casualties take place on such roads; and so retaining the existing 30mph limit on all of them would seriously undermine the main objective of the policy.⁶

⁵ [20mph Task Force Group report | GOV.WALES](#)

⁶ In the period 2018 to 2022 there were 6470 casualties on A and B roads in Wales with a 30mph speed limit, some 27% of all casualties. Source: Agilisys, using STATS19 data

1.4.5 The Task Force recommended that factors which could be used to define the Principal Urban Network (PUN) were:

- Trunk Roads
- Primary Route Network
- A and B Classified Roads
- Abnormal Load Routes
- Motorway Diversion Routes
- Dual Carriageways
- Important Bus/Coach Routes

1.4.6 And that whether a 30 or 20 limit would be appropriate on these roads could be based on:

- Frontage Land Use (e.g. residential, retail, education, civic, community)
- Local Community (e.g. population, deprivation)
- Road Safety and Public Health (e.g. recorded casualties, noise, air quality)
- Sustainable travel (e.g. Active Travel Route, walk/cycle flows, bus services)
- Motor traffic (speed, volume, composition)
- Road layout (geometry, cycling provision, crossings)

1.4.7 Transport for Wales (TfW) prepared a GIS⁷ Tool based on this two-stage process, which generated a series of draft indicative maps showing possible future speed limit maps. The criteria used by TfW to prepare these maps were much more limited than the possible criteria given above and were:

- To define the PUN:
 - All A and B classified Roads
- 20mph speed limit may be appropriate where:
 - Within 100m of a school
 - More than 20 residential addresses per km
 - More than 20 retail addresses per km

⁷ [Geographical Information System](#)

- 1.4.8 The Task Force recommended that this mapping tool should be trialled and refined through the Pilot Settlements Project (subsequently renamed the Phase One Settlements Project). This would then enable Welsh Government to prepare guidance for highway authorities on the making of exceptions, which would form part of an overall revision of Circular 24/2009 ‘Setting Local Speed Limits in Wales’.
- 1.4.9 The Task Force also recommended that, from 2021, the Welsh Government should begin the process of engaging with the public over the principle of establishing a 20mph default urban speed limit, well before the passing of the necessary legislation. The strain on Welsh Government’s resources due to Covid, as well as the difficulties posed by the Covid restrictions themselves, meant that no interactive engagement with the public took place in the period between the Task Force report being published in Summer 2020 and the introduction of the legislation in Summer 2022. An open public consultation on the proposed law change was carried out in 2021.
- 1.4.10 A communication campaign to inform the public of the forthcoming change only began in March 2023, well after the law had been passed.

1.5 Phase One Settlements – 2020 to 2022

- 1.5.1 The Welsh Government trialled area-wide 20mph speed limits in eight areas⁸, in advance of the national roll-out. The purpose of this was to help develop and refine the guidance, tools and techniques that would need to be applied by highway authorities and other agencies across Wales.
- 1.5.2 TfW worked closely with officers from these highway authorities, who made use of their draft maps to identify possible exceptions. Although some minor adjustments were made to these maps following comments by officers, no changes were made to the basic parameters used in the GIS tool to define the PUN and to decide which main roads should be made exceptions.

1.6 Exceptions Guidance - November 2022

- 1.6.1 It had been expected that a revision to Circular 24/2009 ‘Setting Local Speed Limits in Wales’ would be available for highway authorities to use to prepare for the roll out of the new 20mph limits. However, delays to its production meant that a more focused document needed to be produced.

⁸ [Abergavenny, Buckley, Cardiff North, Cilfrew, Llanelli North, St Brides Major, St Dogmaels, Severnside](#)

1.6.2 This was published in November 2022 as ‘Setting exceptions to the 20mph default speed limit for restricted roads’⁹, as an addendum to Circular 24/2009. The guidance was intended for local interpretation by highway authorities to make evidence-based decisions on setting exceptions.

1.6.3 The underlying principle of the guidance is that, in line with a Safe System¹⁰ approach, 20mph speed limits are necessary where pedestrians and cyclists frequently mix with motor traffic. This is set out in Article 11 of the UN Stockholm Declaration¹¹ which mandates:

‘a maximum road travel speed of 30km/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’.

1.6.4 In its ‘Principles’ section (2.1) the exceptions guidance includes two principal questions, A and B, to help highway authorities decide whether a 30mph exception should be made:

- **Question A: Are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?**

If the answer to A is ‘no’ then an exception for a 30mph speed limit may be appropriate.

- **Question B: If the answer to A is ‘yes’, are the pedestrians and cyclists mixing with motor traffic?**

If the answer to B is ‘no’ then a 30mph speed limit exception may be appropriate.

If the answer to B is ‘yes’, then a 20mph speed limit will be appropriate unless the robust and evidenced application of local factors indicates otherwise.

1.6.5 Highway authorities are advised in the guidance that most exceptions should be made on A and B classified roads, and that exceptions will not normally be made on other roads.

⁹ [Setting Exceptions 20mph default speed limit on restricted roads](#)

¹⁰ <https://www.rospa.com/media/documents/road-safety/factsheets/safe-system-factsheet.pdf>

¹¹ <https://www.roadsafetysweden.com/about-the-conference/stockholm-declaration/>

- 1.6.6 A set of 'Place' criteria are given to guide authorities on which sections of roads may have significant demands for people walking and cycling (and so answer Question A). These are:
- 1 *Within a 100m walk of any educational setting (e.g. primary, secondary, further education and higher education)*
 - 2 *Within 100m walk of any community centre*
 - 3 *Within 100m walk of any hospital*
 - 4 *Where the number of residential and/or retail premises fronting a road exceeds 20 properties per km.*
- 1.6.7 The guidance also gives advice on applying local factors, with a number of examples. These include where residential and retail premises are only on one side of the road and so there may be little need to cross the road. The needs of cyclists travelling along the road will still need to be considered, however.
- 1.6.8 The guidance notes that decisions on exceptions should not be influenced by existing speeds; and that the fact a section of road is on a bus route is not in itself a justification for making an exception. It notes that part time speed limits may be made where a highway authority considers an exception may be appropriate at some times and not others.
- 1.6.9 The exceptions guidance thus generally followed the principles of the TfW GIS tool. It states that highway authorities should focus on A and B classified roads when considering exceptions; and uses similar numerical criteria to those developed at Task Force stage to guide highway authorities on which sections of road may have significant demands for people walking and cycling.

3. Initial Application of the Exceptions Guidance

1.7 Introduction

1.7.1 This section of the report summarises the available data on the former and current speed limits in settlements across Wales; and identifies how exceptions varied between different authorities.

1.8 Pre- and Post-Implementation Speed Limits

1.8.1 Welsh Government provided a platform on Data Map Wales for highway authorities to publish their proposed exceptions to the default 20mph limit¹². GIS information from that platform has been used by the Review Team to create the maps in Figures 3-1 to 3-4, which show the 20mph and 30mph speed limits across northern and southern Wales pre- and post-17th of September 2023.

1.8.2 It can be seen from these maps that:

- Most urban roads across Wales changed from a 30mph to a 20mph speed limit when the default limit for restricted roads changed.
- Prior to that date there were significant parts of the major cities in southern Wales with a 20mph limit. 20mph limits/zones were present in some parts of settlements in northern Wales but were less common and extensive.
- Post implementation, there are more 30mph exceptions in settlements in southern Wales, but these only make up small parts of the urban road network.

¹² [Roads affected by changes to the 20mph speed limit on restricted roads](#)

Figure 3-1: Northern Wales Speed Limits, PRE-September 17th 2023

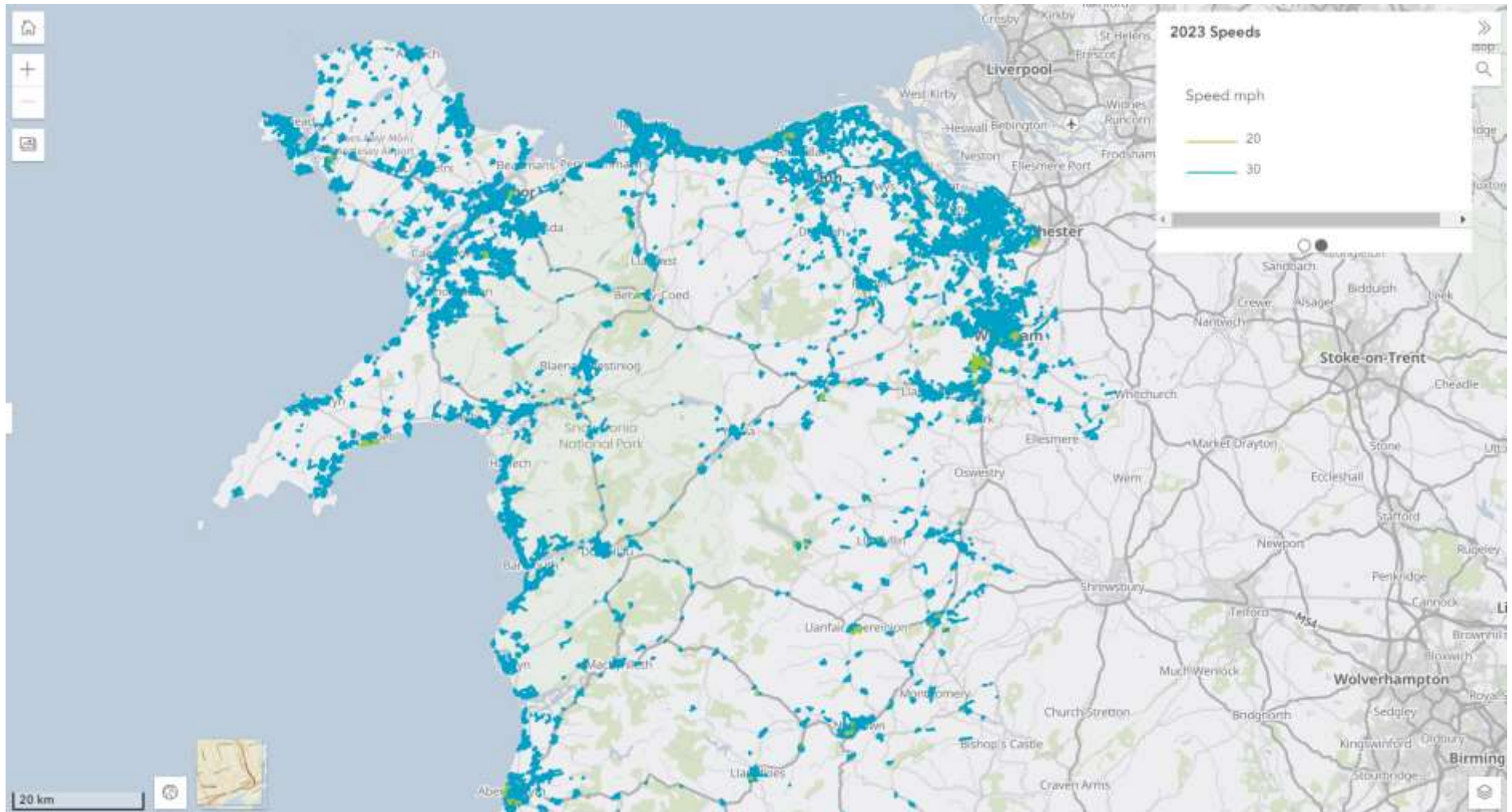


Figure 3-2: Northern Wales Speed Limits, POST-September 17th 2023

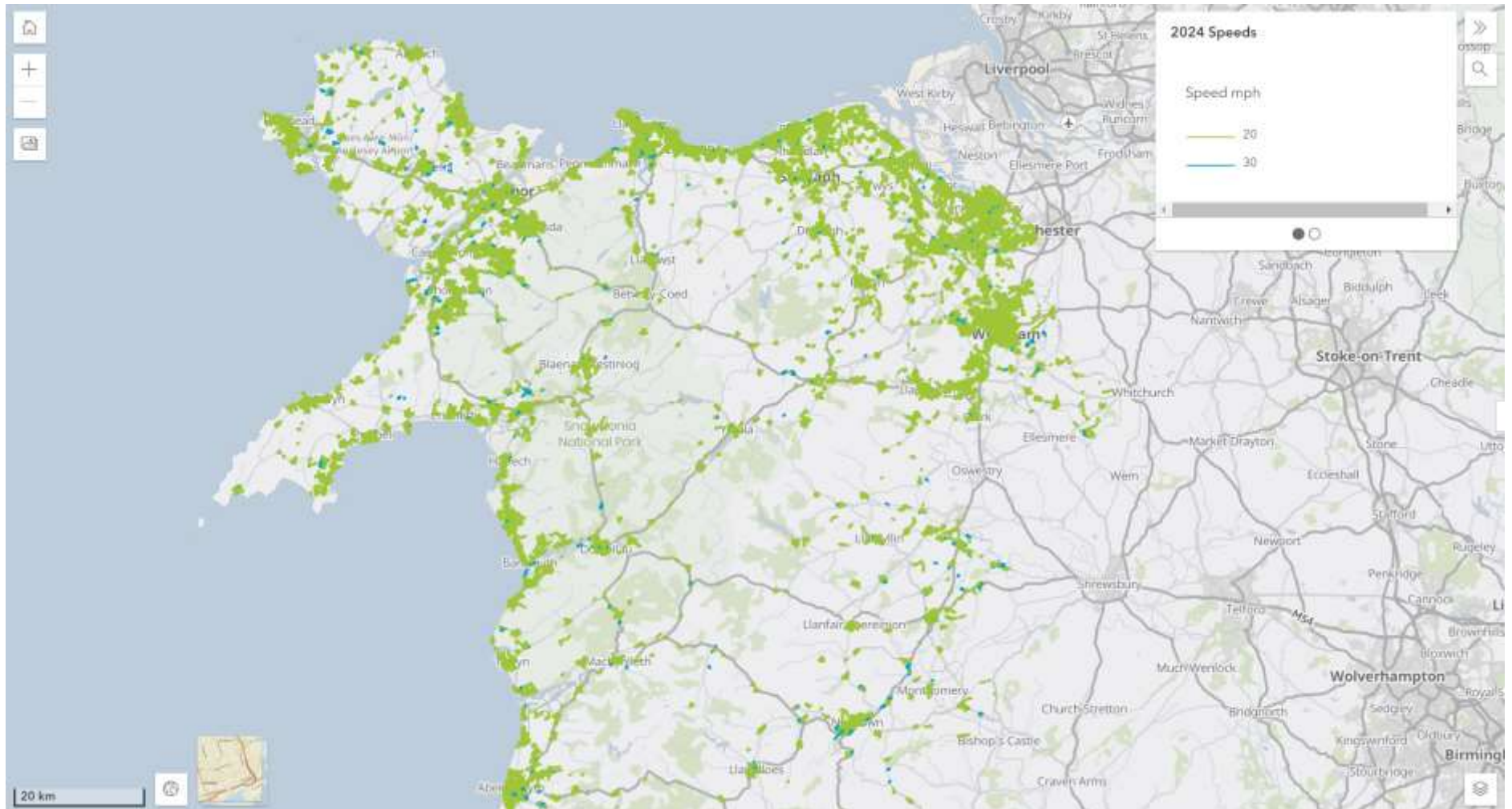


Figure 3-3: Southern Wales Speed Limits, PRE-September 17th 2023

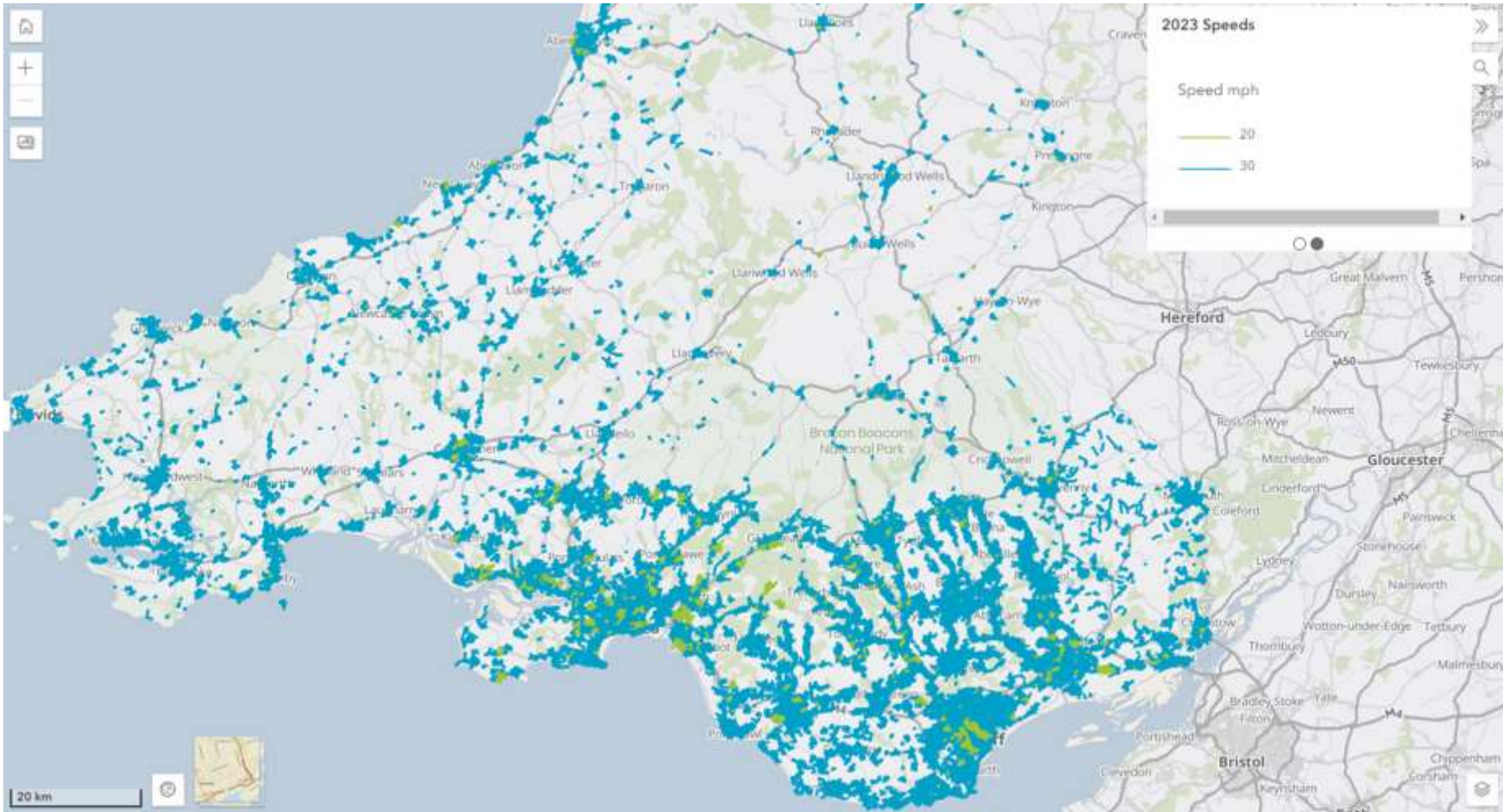
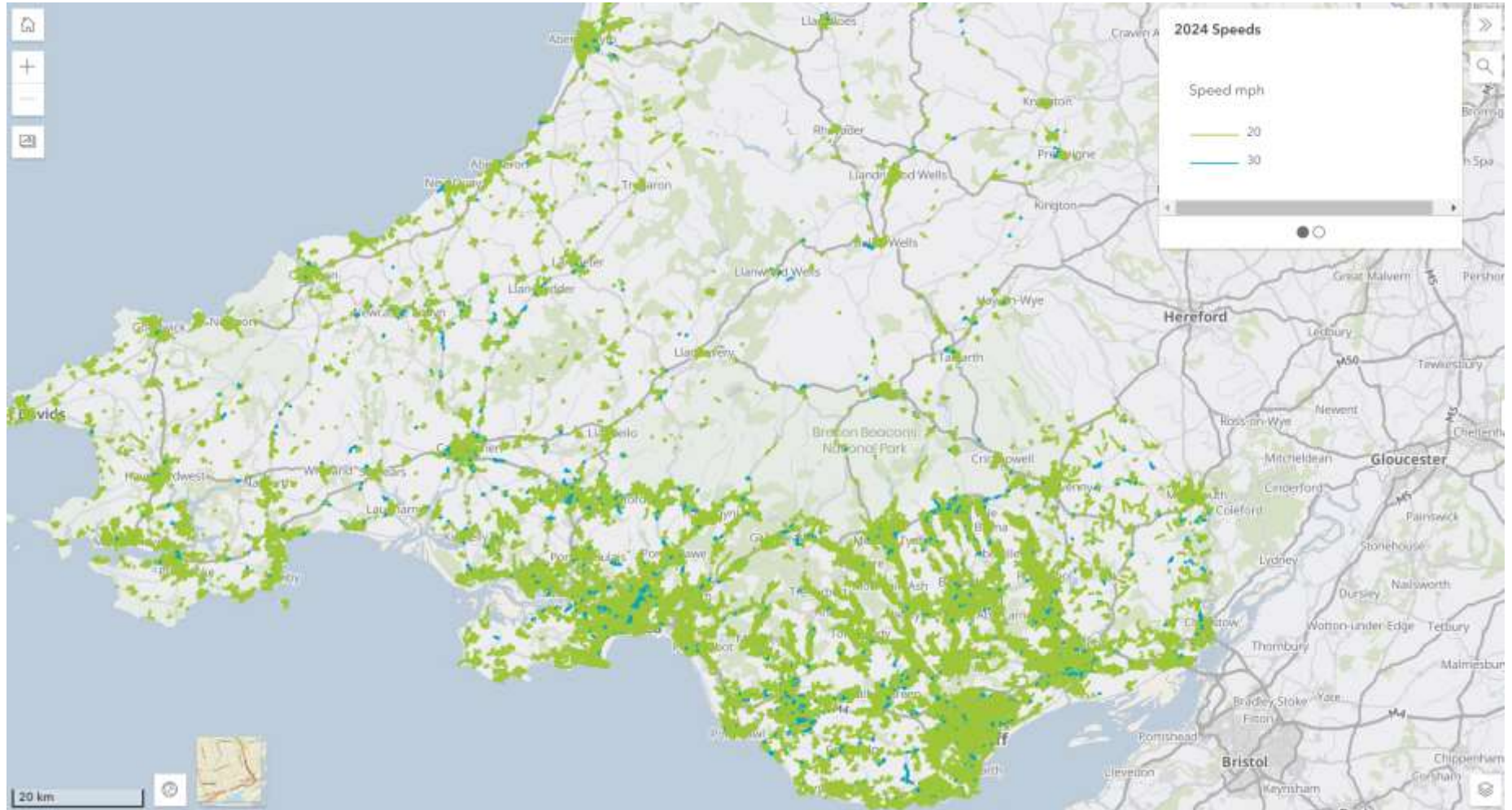


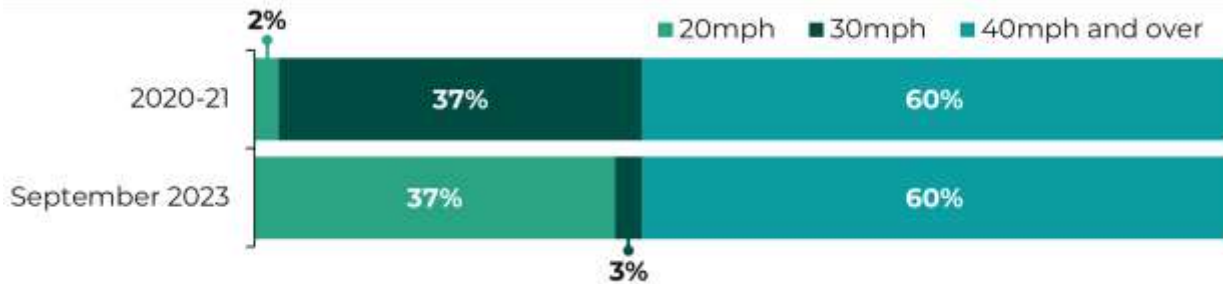
Figure 3-4: Southern Wales Speed Limits, POST-September 17th 2023



Figures 3.1-3.4 contain OS data © Crown Copyright and database rights 2024 OS 100021874. Powered by ESRI

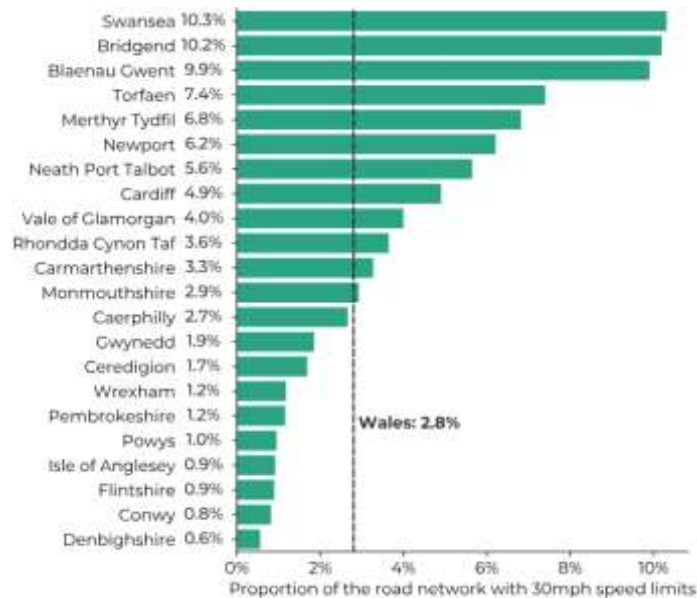
1.8.3 A report on the implementation and effectiveness of 20mph in Wales was published by Senedd Research on 17th October 2023.¹³ This included the estimated road length by road speed limit in 2020-21 and after the law change – see Figure 3-5.¹⁴

Figure 3-5: Estimated road length by road speed limit, Wales, September 2023 (Senedd Research)



1.8.4 The Senedd Research report also included a graph (Figure 3-6) showing the proportion of the Welsh road network with 30mph limits, by local authority. This indicated that there are significant differences in the lengths of the exceptions, and that authorities in northern Wales have made far fewer exceptions than those in southern Wales.

Figure 3-6: Proportion of the Welsh road network with 30mph speed limits (Senedd Research)



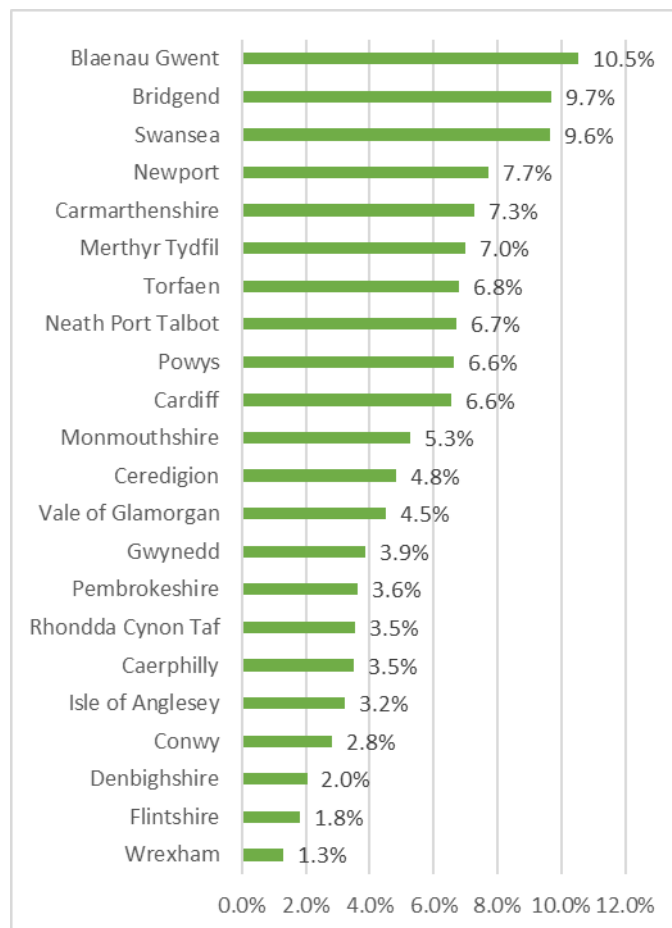
1.8.5 However, it is important to note that these percentages are for the whole of the road network, i.e. including roads outside built-up areas. They therefore do not take into account how the urban/rural split differs across Wales.

¹³ [20mph in Wales: implementation and effectiveness \(senedd.wales\)](https://www.senedd.wales/20mph-in-wales-implementation-and-effectiveness)

¹⁴ [Ad-hoc statistical requests: 14 September 2023 | GOV.WALES](https://gov.wales/ad-hoc-statistical-requests)

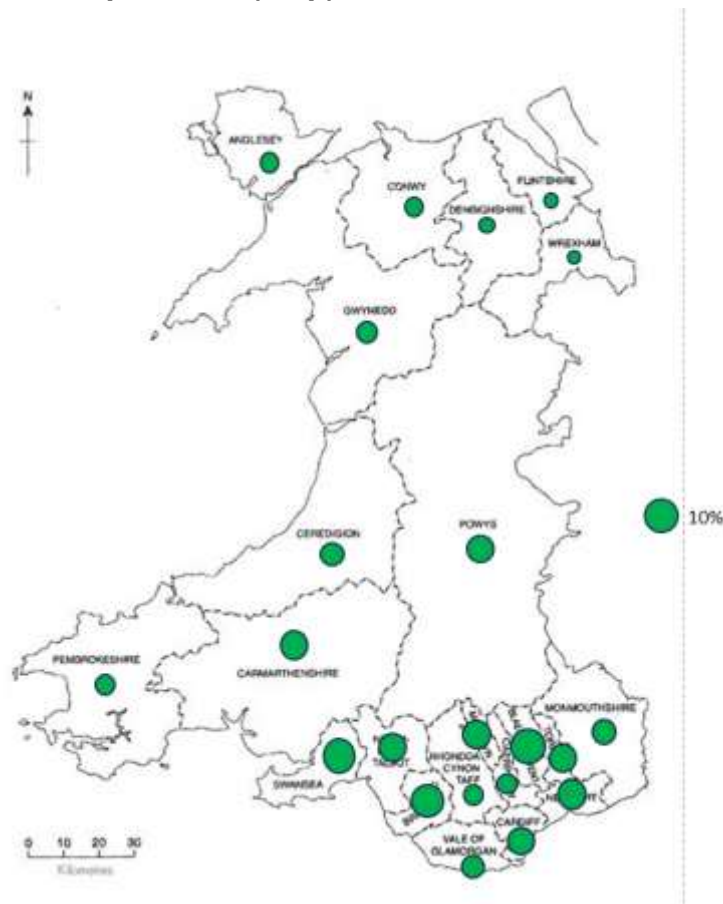
- 1.8.6 Additional data on the lengths of speed limits in Wales has been obtained by the Review Team from Insight Warehouse¹⁵, which maintains the Ordnance Survey's data set on speed limits. Figure 3-7 shows, as a chart, the current proportion of the road network with 30mph speed limits, as a percentage of the previous 30mph network. Figure 3-8 shows the same information in map form.
- 1.8.7 This data should be regarded as preliminary and subject to change, as the data on the previous 30mph limits may not be completely accurate and is in the process of being verified. It also includes roads within the local authority area which are on the Strategic Road Network for which the highway authority is the Welsh Government. Any discrepancies are expected to be minor, however.

Figure 3-7: Proportion of the Welsh road network retaining 30mph speed limits as percentage of all former 30mph roads (chart)



¹⁵ <https://insight-warehouse.co.uk/>

Figure 3-8: Proportion of the Welsh road network retaining 30mph speed limits as percentage of all former 30mph roads (map)



1.8.8 This data shows that there are significant differences across Wales, but the ratio between the authorities with the fewest and most exceptions is not as great as was stated in the Senedd Research report. It still shows that local authorities in southern Wales have generally made more 30mph exceptions than those in northern Wales but there are some local variations – e.g. between Blaenau Gwent at 10.5% and nearby Caerphilly and Rhondda Cynon Taf, both at 3.5%.

4. Views of Stakeholders

1.9 Highway Authorities

Consulting on Exceptions

- 1.9.1 Highway authorities received the first drafts of exceptions maps based on TFW's GIS tool in summer 2021. It took the Authorities some time to assess all their roads and get the maps finalised and published on Data Map Wales. All Authorities consulted with at least their statutory consultees through the Traffic Regulation Order making process for making the 30mph exceptions; however, the picture is more varied when it came to engagement with the public more generally about the introduction of the default 20mph legislation and the resulting speed limit changes.
- 1.9.2 Most authorities did not engage with the public at large due to lack of resource and time, which was exacerbated by the impact of the Covid pandemic. The highway authorities expected and trusted that the national communication and behaviour change campaign, which Welsh Government had promised since the beginning of the national process in summer 2021, would be sufficient. It had stressed the importance of local communication and engagement with the public and shared best practice from the first phase settlements, but officers felt it did not do enough to assist highway authorities to practically undertake engagement.
- 1.9.3 Some highway authority officers also felt that engaging about the default 20mph at the stage when they were consulting on the exceptions would confuse the public, as they would not be able to object to the default 20mph being introduced but only to the 30mph exceptions.

Reviewing Exceptions

- 1.9.4 Meetings were held with highway officers at the beginning of October 2023 in the immediate aftermath of the coming into force of the default 20mph legislation.
- 1.9.5 The officers asked Welsh Government to consider giving time for speeds to settle and the public to get used to the new speed limits before making changes to the guidance. This was reflected in a written statement published by the Welsh Government on the 25th of October.¹⁶ By the end of October, it had become more evident however, that there were differences in how the guidance had been interpreted and the ensuing number/length of exceptions across Wales. In a debate

¹⁶ [Written Statement: Supporting highway authorities with the implementation of 20mph \(25 October 2023\)](#)

held a few days prior to the coming into force of the legislation, on the 13th of September 2023, the Senedd had agreed a motion calling for the Welsh Government *'to continuously review the impact of new limits, empower local authorities to make any further exemptions and provide local authorities with adequate funding to facilitate the introduction of new limits.'*¹⁷

- 1.9.6 During the month of November 2023, a series of meetings to gather feedback on the application of the exceptions guidance by highway authorities' officers were held and led by the Welsh Local Government Association (WLGA). Some were held with individual local authorities, in other cases neighbouring authorities attended together and, where there are strategic roads in the local authority area, the trunk road agents attended on behalf of Welsh Government. The aim was to gain a better understanding of how the exceptions guidance had been applied, whether the officers had encountered any difficulties when applying it and how that feedback could help shape any revisions to the Exceptions Guidance going forward.
- 1.9.7 The WLGA spoke to 19 local authorities and the two trunk road agents SWTRA¹⁸ and NMWTRA¹⁹. It seems that some authorities had been more risk averse than others; the former were concerned about liability in the case of setting a higher speed limit than the default limit, and unsure how to make a reasoned case/statement of reasons for road safety when introducing a higher speed limit.
- 1.9.8 Some had considered factors like traffic flow and the strategic importance of a road as a movement corridor for motorised vehicles that were not in the Guidance, to make additional exceptions. There were other officers who said they had tried to minimise the use of exceptions in the spirit of the guidance that was to have 20mph as the default where pedestrians and cyclists mix with motorised traffic but also to cater for potential increases in walking and cycling.
- 1.9.9 These are other reasons that could explain the observed variations in the number/length of exceptions, including differences in:
- Geographical and topographical conditions and how they influence walking and cycling demands
 - Road network structure
 - Density of population

¹⁷ [Agenda for Plenary on Wednesday, 13 September 2023, 13.30 Senedd Cymru, Item 8](#)

¹⁸ [South Wales Trunk Road Agency](#)

¹⁹ [North and Mid Wales Trunk Road Agency](#)

- Degree of rurality
- Which roads were 30mph restricted roads to start with, i.e. there was considerable variation in some areas beforehand
- The extent of 20mph limits and zones already in place
- Whether authorities chose to consider roads with 30mph limits set by Order, in addition to restricted roads with street lighting
- The use of buffer speed limits
- The introduction of short lengths of speed limits (resulting in significant number of speed limit changes along some routes)
- Local member input/engagement
- How and whether the highway authorities directly engaged with the public
- Degree of priority being given to the movement of traffic
- How the words 'significant' and 'potential pedestrian and cyclist activity' had been interpreted

1.9.10 Although there was some variation in how highway authorities had interpreted the Exceptions Guidance, all felt they were able to justify their decisions. Most authorities said they had received correspondence from the public and/or councillors asking that consideration should be given to changing speed limits on a small number of roads. However, officers generally did not wish to carry out any reviews until the new limits had been given time to bed in; and until any revised guidance was published by the Welsh Government.

1.9.11 Feedback from these sessions was given to highway authorities in two meetings at the end of November and beginning of December; and everyone was given another opportunity to make comments, together with initial thoughts on how the Exceptions Guidance could be clarified.

1.10 Local Members' Views

1.10.1 Many Council Leaders and Transport cabinet members have expressed their support for the policy since the introduction of the default 20mph limit, the latest occasion being on the 22nd of January in a meeting with local authorities called by the Deputy Minister Lee Waters to discuss the review and next steps for 20mph.

1.10.2 Some said there were streets that should not have defaulted to 20mph, and they welcomed the review and clarified guidance that they hoped could give them more

flexibility. They had also however had requests from the public to reconsider exceptions and argued that they should have defaulted to 20mph.

- 1.10.3 There are also settlements where the current speed limit is 40mph, 50mph or even 60mph and residents are campaigning for lower speed limits and argue that the criteria for a 20mph street fit their situation.

I.11 Other Stakeholders

Bus Operators

- 1.11.1 Arriva Wales has stated that journey times have lengthened on some routes in North Wales, resulting in changes to the timetable of the X51 from Rhyl to Wrexham, which will no longer call in the village of Llandegla, Denbighshire²⁰. It has been reported that Arriva is also considering changes to other routes in North Wales.
- 1.11.2 Transport for Wales is in dialogue with bus operators over the impact of reduced speed limits on bus timetables.
- 1.11.3 Initial discussions have been held with CPT Cymru²¹, as a member of the Review Group, who expressed the view that there have been impacts on most bus services, but in particular inter-urban and rural services, in terms of travel times and reliability. CPT stated their support for the 20mph policy but stressed the importance of punctuality for buses, hence calling for bus priority measures where possible. CPT will be invited to provide further information and data for the next stage of this review.

Other Organisations

- 1.11.4 To our knowledge no other organisations have commented publicly on the need for changes to exceptions. Further views will be sought at the next stage of this review.

²⁰ [Explanation of Arriva's changes to the X51 service in Llandegla | Arriva Bus UK](#)

²¹ Confederation of Passenger Transport Cymru

5. Early Findings and Initial Recommendations

1.12 Introduction

- 1.12.1 This report has been prepared in a short period of time, beginning in mid-January 2024. This final section presents the early findings and initial recommendations of the review, in so far as they can be made at this stage.
- 1.12.2 Further information will be gathered in the next stage of the review, including the views of stakeholder groups and representative bodies.

1.13 Early Findings

- 1 Highway authorities do have the power to set local speed limits and therefore may make more exceptions prior to any updated guidance being published. However, it is recognised that many authorities are unwilling to do so, in advance of this review.
- 2 This change to a default 20mph limit for urban areas has led to the first wholesale review of speed limits across Wales for many decades. There was some inconsistency in the application of local speed limits prior to the change. Not surprisingly there are some anomalies and inconsistencies in the current speed limits.
- 3 Some of these inconsistencies have arisen on main roads through settlements that were subject to a speed limit above 30mph before the change in the law. These roads were not covered by the legislation, and nor were roads that were made 30mph by order. Nevertheless, some highway authorities changed speed limits on such roads, while others did not.
- 4 Greater consistency in the application of exceptions across Wales, taking into account the function, design and context of a road, would be helpful to all road users so that urban roads with 20mph and 30mph limits have consistent characteristics across Wales.
- 5 Some rural and inter-urban bus routes, in particular, seem to have been adversely affected by the introduction of lower speed limits. Further data on the impact on bus services is needed.
- 6 Engagement with the public, both at national and local levels, should have begun earlier and been more comprehensive and interactive.
- 7 The Exceptions Guidance focused on a limited number of criteria. Those that were included related mainly to some aspects of the Place function of streets and

roads, and less on their Movement function and highway characteristics²². These criteria were largely set during the Task Force stage and were not subject to extensive review by a range of stakeholders before being published in November 2022.

- 8 The inclusion in the Exceptions Guidance of the figure of only 20 dwellings/km - and its application by highway authorities - as a basis for indicating that there could be significant demands for walking and cycling led to few exceptions being made. This resulted in some cases to extensive sections of 20mph on A and B roads, including through areas of ribbon development which extended well beyond the centres of settlements.
- 9 There is evidence of variation between highway authorities in how exceptions were made, both in terms of consultation and regulatory processes and the number/length of exceptions.
- 10 Some authorities have applied the Exceptions Guidance more flexibly than others, taking into account the local context, and seeing it as a framework for making professional judgements. Others applied it more literally, interpreting guidance as binding; this was sometimes due to concerns over legal liability if exceptions were made. Many authorities have found the Exceptions Guidance difficult to interpret.

1.14 Initial Recommendations

1. The guidance should be revised and clarified in the light of experience. More criteria should be included to help highway authorities take into account local context more fully.
2. The guidance should also be broadened to address all speed limits in settlements and not only those that have defaulted to 20mph as a result of the law change.
3. To assist in the drafting of this updated guidance, the Review Team recommends that views should be sought on:

²² The 'Place' and 'Movement' functions of streets are defined in [Manual for Streets](#).

Place status denotes the relative significance of a street in human terms. The most important places will usually be near the centre of any settlement or built-up area, but important places will also exist along arterial routes.

Movement status can be expressed in terms of traffic volume and the importance of the street within a network – either for general traffic or for specific modes (e.g. bus or cycle).

- The Principles for setting exceptions (Section 2.1 in the existing guidance)
 - The Process for setting exceptions (Section 2.2), including the criteria used
 - Whether these criteria (e.g. for Place) should include numeric parameters
 - If so, whether the current values are appropriate
 - Whether guidance on Movement and highway characteristics should be expanded
 - Whether there are other issues that should be addressed in revised guidance
4. The process of updating guidance should draw upon a wide range of views and representations from stakeholder groups and representative bodies.
 5. Training for highway authority officers should be developed and provided to help highway officers in interpreting and applying guidance issued by the Welsh Government.
 6. Legal advice should be sought on the potential liability of highway authorities when making new exceptions to the default 20mph limit to increase the speed limit locally.

I.15 Next Steps

- 1.15.1 To inform the next stage of this review, we will seek further views of authorities, stakeholder groups and representative bodies on:
 - Issues experienced by highway authorities in applying the guidance
 - Changes to the current Exceptions Guidance, as referred to above.

- 1.15.2 Organisations and stakeholders we will be directly making contact with include:
 - Highway Authorities
 - Association of transport Coordinating Officers (ATCO)
 - Coach Passenger Transport (CPT)
 - Coach and Bus Association Cymru (CABAC)
 - Regional Bus planning teams
 - National Private Hire and Taxi Association (NPHTA)
 - Care workers (Social Care Wales)
 - Federation of Small Businesses (FSB)

- Royal Mail
- Road Haulage Association (RHA) and Logistics UK (Wales Council)
- Delivery companies
- National Health Service
- Public Health Wales
- 20's Plenty for Us
- Living Streets
- Sustrans
- Cycling UK
- AA
- RAC
- Associations of Driving Instructors
- Police and other emergency services
- One Voice Wales
- Disability Wales

1.15.3 Arrangements will be publicised as soon as possible to enable other bodies to make representations.

Appendix A Terms of Reference

Review commissioned by the Welsh Government of 20mph default speed limit exceptions.

Terms of Reference

1. Membership

The review team comprises:

- Phil Jones, the Chair of the 20mph Task Force Group
- Peter Jones, Professor of Transport and Sustainable Development at University College London, who has had no involvement in 20mph implementation and will provide an independent perspective
- Kaarina Ruta, Transport Adviser at the Welsh Local Government Association.

The team will work with a review group comprising Welsh Government officials, local authority officers and other experts and partners.

2. Purpose

The review will examine the application of guidance given to highway authorities in setting exceptions to the default 20mph limit.

3. Remit

Feedback from the highway authorities has helped the review team gain an understanding of the application of the guidance in different parts of Wales; reflect on that application and consider whether clarifications and modifications to the guidance are needed to encourage greater consistency across Wales in the approach taken to roads that appear to be on the threshold between 20mph and 30mph.

The review team are to consider the feedback alongside other evidence to prepare draft conclusions and initial recommendations for consideration by the review group and then submit to the Welsh Government for publication in February 2024. The review team will then engage with local authority cabinet members and other key stakeholders, as well as representatives of industries affected by the speed limit changes, including bus operators and regional bus service planning teams. The review team, together with the Welsh Government, will offer support to local authorities where they are keen to rapidly consider changes to roads where the decision between a 20mph and 30mph speed limit is less clear cut.

The review team will prepare a final report, accompanied by draft updated guidance on setting the speed limits in settlements affected by the 20mph default speed limit and exceptions, building on implementation experience to date, and make recommendations on how this could be applied to communities on roads which currently have higher speed limits. Updates to the guidance could include, for example, taking into account the impact on bus routes and local communities.

Appendix B Letter to Local Authorities, 23 January 2024



Llywodraeth Cymru
Welsh Government

**Lee Waters AS/MS
Y Dirprwy Weinidog Newid Hinsawdd
Deputy Minister for Climate Change**

January 2024

Dear Colleagues,

Thank you for joining us today to update you on 20mph and the unnecessary obstruction of the road (pavement parking). The Welsh Government has appointed a small team, comprising Phil Jones, as Task Force Group chair, Peter Jones, Professor of Transport and Sustainable Development at University College London, and Kaarina Ruta, Transport Adviser at the WLGA, to undertake a review of the application of guidance given to highway authorities in setting exceptions to the default 20mph limit.

Peter Jones has had no involvement in 20mph implementation and will provide an independent perspective.

The team will work with Welsh Government officials, local authority officers and other experts and partners (“the review group”).

A series of meetings has already been held, in preparation, to:

- gain an understanding of the application of the guidance in different parts of Wales
- reflect on that application and consider whether clarifications to the guidance are needed to encourage greater consistency across Wales
- look at the approach taken to roads on the threshold between 20mph and 30mph
- share initial findings with local authority officers.

The team will review the outcomes from this preparatory work alongside other evidence. They will prepare draft conclusions and recommendations for consideration by the review group and then for submission to the Welsh Government for publication in February 2024.

The team will then engage with local authority cabinet members and other key stakeholders, as well as representatives of industries affected by the speed limit changes, including bus operators and regional bus service planning teams. The team, together with the Welsh Government, will offer support to local authorities where they are keen to rapidly consider changes to roads where the decision between a 20mph and 30mph speed limit is less clear cut.

The team will prepare a final report, accompanied by draft updated guidance on setting the speed limits in settlements affected by the 20mph default speed limit and exceptions, building on implementation experience to date **and make recommendations on how this could be applied to communities on roads which currently have higher speed limits**. Updates to the guidance could include, for example, taking into account the impact on bus routes and local communities.

The report and draft updated guidance will be submitted to the Welsh Government by the Summer Recess 2024.

Yours sincerely

Lee Waters AS/MS
Y Dirprwy Weinidog Newid Hinsawdd
Deputy Minister for Climate Change