



**ASSOCIATION OF
CHIEF POLICE OFFICERS**

ACPO Speed Enforcement Policy Guidelines 2011- 2015: Joining Forces for Safer Roads

The Association of Chief Police Officers has agreed to these guidelines being circulated to, and adopted by, Police Forces in England, Wales & Northern Ireland.

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Author	ACPO
Force/Organisation	ACPO
ACPO Business Area	Uniformed Operations
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These guidelines have been produced and approved by the Uniformed Operations Business Area. The document was approved by Chief Constables' Council on 19th July 2000. The purpose of this document is to publish the ACPO vision of safer roads with habitual compliance, where enforcement is seen as legitimate. Officers are encouraged to enforce with an appropriate balance of education and engineering so as to affect and influence driver behaviour and achieve a reduction in road casualties. It will be updated and re-published as necessary.

Any queries relating to this document should be directed to either the author detailed above or the ACPO Programme Support Office on 020 7084 8959/8958.

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1. SECTION 1 – INTRODUCTION

1.1 SPEED ENFORCEMENT

1.1.1 The road policing ethos is to deliver a crucial protective service that engenders public satisfaction and confidence. Part of this service is to provide speed enforcement where:

- A mandatory limit has been introduced;
- There is need for compliance;
- The speed necessary is clear to all drivers using the road; and
- Some decide to ignore the limit and road safety benefit achieved through compliance.

1.1.2 When a road looks and feels like the speed limit many will comply and where possible there will be a level of routine enforcement (patrols attending whenever possible) to support the limit, however, when the limit is confusing or unclear it will not be routinely enforced, however where there is intelligence that there is either specific or widespread deliberate non-compliance of the limit there should be targeted enforcement.

1.1.3 Speed enforcement is expensive; it is both time and resource intensive and competes with other important policing issues of equal public concern. Enforcement is mainly reactive and should not be seen as a preventative measure to achieve vehicle speeds, prevention relying on public support and compliance by the majority.

1.1.4 Speed restrictions must be clear, appropriate and with the need for compliance obvious to all road users as this will result in the majority complying. Where there is non-compliance, the police will investigate and target specific offenders who ignore the clear-posted speed limit. Mass defiance identifies questionable limits which maybe in inappropriate areas and rather than a need for high levels of enforcement and prosecution, which has the potential to lose public support, the limit should be reviewed (DfT 01/2013). Review should lead to additional engineering, signing or even different speed limits, and the limit more likely to have been the cause than deliberate offending. It is these principles that inform any police decision to undertake enforcement routine or targeted.

1.2 ENFORCEMENT TOLERANCES

1.2.1 In July 2000 the ACPO Roads Policing Portfolio published Speed Enforcement Guidelines 'Joining Forces for Safer Roads' this document has been used by patrolling officers and decision makers since that date. The document has become out-dated over time although many of the principles are still appropriate today. It is for this reason alone that the previous guidance has been updated and these new guidelines agreed.

1.3 POLICY GUIDELINES INTRODUCTION

1.3.1 Limits which are clear to drivers achieve high compliance, require less enforcement and meet public expectation, together, with targeted enforcement against those who refuse to comply; they secure a higher level of compliance with existing speed limits and have the potential to deliver the following benefits:

- Reduced casualties, in terms of both numbers and severity;
- Reduced demand upon the Health Service;
- Reduced conflict between motor vehicles and other road users;
- A calmer and more free-flowing traffic environment; and
- Improved quality of life in local communities.

2. SECTION 2 – ROADS POLICING STRATEGY 2011-15

- 2.1 The Road policing strategy 'Policing the Roads' contains our vision of safer roads with habitual compliance, where enforcement is seen as legitimate. Officers are encouraged to enforce with an appropriate balance of education and engineering so as to affect and influence driver behaviour and achieve a reduction in road casualties and combat anti-social road use.

3. GOVERNMENT CIRCULAR 01/2013

- 3.1 The Government has recently published a circular 'Setting Local Speed Limits'. In this document they highlight key points:
- Speed limits should be evidence-led and self-explaining to seek to reinforce people's assessment of what is a safe speed to travel; and
 - Encourage self-compliance and seen as the maximum rather than a target speed.
- 3.2 In the document they highlight how speed management is there to create a safe environment and how it should require, encourage and help road users to adopt appropriate and safe speeds below the limit, self-explaining and reinforcing so not unclear or resulting in large scale offending.
- 3.3 Speed limits should not be set in isolation but as part of a package with other measures to manage vehicle speeds and improve road safety, helping drivers to be more readily aware and drive at an appropriate speed.
- 3.4 It is seen as important that traffic authorities work closely with the police when considering or determining any changes to a speed limit. Enforcement appropriate but only after other measures and the cost must be considered before introducing or changing a limit.
- 3.5 20 mph limits can be introduced where there are significant numbers of vulnerable road users, however where they do so, general compliance needs to be achievable without excessive reliance on enforcement. Successful limits and zones being self-enforcing through site conditions such as signing or traffic calming leading to a mean traffic speed, which is compliant.
- 3.6 To achieve compliance there should be no expectation on the police to provide additional enforcement beyond routine activity - unless agreed.

4. SECTION 4 – THE PRINCIPLES OF SPEED ENFORCEMENT

- 4.1 The enforcement of traffic law by the police should be guided by the principles of:
- **Proportionality** in applying the law and securing compliance;
 - **Targeting** of enforcement action;
 - **Consistency** of approach; and
 - **Transparency** about what enforcement action is undertaken, and why.
- 4.2 This needs to be with the recognition that effective **partnerships** with other organisations are essential.
- 4.3 Enforcing speed limits that are not clear, feel like roads with higher limits than in fact they are and tend to confuse rather than help those drivers that wish to comply, will lose that public support and confidence the police service needs.

5. SECTION 5 – PROPORTIONALITY

- 5.1 Proportionality means relating enforcement action to the risks and not routinely enforcing inappropriate or unclear/confusing limits. Those whom the law protects and those on whom it places duties expect that action taken by the police to achieve compliance (in this case speed limits) should be proportionate to the risks to individuals and property, based on the offenders choice to offend rather than genuine mistake or worse still confusion from unclear limits and to the seriousness of any breach.

6. SECTION 6 – TARGETING

- 6.1 Targeting means making sure that enforcement action is directed primarily at those whose behaviour poses the greatest risk/highest harm (particularly to others), often at identifiable locations or in identifiable circumstances. Targeting needs to take full advantage of a wide range of information sources, including academic research, to develop a greater level of understanding of what the problems are and how to resolve them, so that enforcement action can be focused and prioritised.
- 6.2 Effective targeting will therefore ensure that:
- Road risks are objectively identified and prioritised for appropriate action;
 - Suitable resources are deployed; and
 - Pertinent monitoring and evaluation takes place so that costs and benefits can be properly assessed and future decision making enhanced.

7. SECTION 7 – CONSISTENCY

- 7.1 Consistency of approach does not mean uniformity. It does mean taking a similar approach in similar circumstances to achieve similar ends. Police Officers are faced with many variables; the decision as to what action to take is a matter of judgement and they must exercise their discretion. Where Police Officers believe that an offence has been committed (in this case, that a motorist has driven at any speed over the relevant speed limit), in exercising their discretion as to the appropriate enforcement action, they must consider the nature and circumstances of the offence, this will include how clear the limit was and whether it would feel like that limit to a visiting driver.
- 7.2 Depending on those circumstances they may decide to:
- Issue a summons;
 - Issue a fixed penalty notice;
 - Offer a speed awareness course (see separate ACPO guidelines on speed awareness);
 - Caution, warn or take no action.
- 7.3 For instance, it might be appropriate to issue a summons for exceeding a speed limit at relatively low speeds over the relevant limit on roads near schools at certain times of day or when there are adverse weather conditions, whereas a similar offence committed in the middle of the night might merit the issue of a fixed penalty notice.
- 7.4 Road users do expect consistency from the police nationally, and this feature has been identified as a benefit linked to the operation of speed cameras. Inconsistency in enforcement decisions as far as the disposal of a case will however undermine public confidence and contribute to resentment. It is part of ACPO's role to ensure that in enforcement proceedings consistency is achieved wherever possible.

8. SECTION 8 – TRANSPARENCY

- 8.1 Transparency means helping drivers to understand what is expected of them and why. It also means ensuring clarity about what the public can expect from the police. Raising the public's understanding of the full implications of their actions (specifically including the human and financial costs) will assist in changing behaviour and ultimately attitudes.
- 8.2 The way in which ACPO tries to achieve transparency is by publishing guidelines to all chief constables to enable them, in turn, to offer operational advice and guidance to their officers. ACPO's guidelines are placed in the public domain.

9. SECTION 9 – THE GUIDELINES

- 9.1 ACPO guidelines have been formulated taking into account the need for proportionality (especially with the introduction of Human Rights legislation) and the need for targeting in order to maximise the potential of scarce police resources and make a substantial contribution to the multi-agency road death and injury reduction effort.
- 9.2 Driving at any speed over the limit is an offence but, if it is unclear, confusing or simply doesn't feel like a road of that speed, then this has to be taken into account when deciding on the prosecution and amount of police enforcement. The differing speed limits are generally related, and proportionate, to the risks to all road users using that road.
- 9.3 Where police officers consider that an offence has been committed i.e. that a motorist has driven at any speed over the relevant speed limit, they should consider whether it is appropriate to take enforcement action against the offender taking into account such facts as the level of signing and engineering to support the limit and whether it was clear to the motorist that there was a limit and at that speed.
- 9.4 The Police Service now uses technology that enables it to prove that an offence has been committed as soon as a driver exceeds the relevant speed limit by a very small margin. Motorists will therefore be at risk of prosecution immediately they exceed any legal speed limit.
- 9.5 The guidance to police officers is that, when they feel enforcement is necessary, it is anticipated that, other than in the most exceptional circumstances, the issue of fixed penalty notices or summonses are likely to be the minimum appropriate enforcement action (with certain offenders offered a course of education in the lower and less harmful speeds).
- 9.6 The guidance is that enforcement by prosecution should not be considered when it is lower than when the speeds have been reached in the following table on the next page.
- 9.7 These guidelines do not and cannot replace police officer's discretion. Where an officer decides to issue a summons or a fixed penalty notice in respect of offences committed at speeds lower than those set out in the table, he or she must consider the tolerances of the equipment used to corroborate their opinion. Police speed equipment are tested and approved to work with a maximum tolerance of +/-2mph up to 66mph and 3% for all speeds higher than 66mph, so it is possible to use these tolerances as a prosecution threshold. Moreover, in particular circumstances, driving at speeds lower than the legal limit may result in prosecution for other offences, for example dangerous driving or driving without due care and attention when the speed is inappropriate and inherently unsafe.

Limit	Device tolerance	Fixed Penalty when education is not appropriate	Speed Awareness if appropriate		Summons in all other cases and above
			From	To	
20 mph	22mph	Not currently issued	No courses		40 mph
30 mph	32 mph	35 mph	35 mph	42 mph	50 mph
40 mph	42 mph	46 mph	46 mph	53 mph	66 mph
50 mph	52 mph	57 mph	57 mph	64 mph	76 mph
60 mph	62 mph	68 mph	68 mph	75 mph	86 mph
70 mph	73 mph	79 mph	79 mph	86 mph	96 mph

Fixed penalty of: £60 (pending)
Licence endorsed 3 penalty points

Magisterial discretion (level 2) maximum of: £1000 fine, Licence endorsed - range of penalty points available, disqualification and/or compulsory re-testing

10. SECTION 10 – EFFECTIVE PARTNERSHIPS

10.1 One agency, acting alone, cannot achieve full compliance. The Police Service actively seeks to develop close working relationships with others (e.g. the Department for Transport (DfT) and Agencies, Highway Authorities, Magistrates Courts, Education Authorities, Road Safety Organisations etc.) in order to promote road safety, achieve the highest level of clarity in limits and zones so as to help those who wish to comply and leave the police to enforce against those who choose to speed rather than do so as a mistake. Working together will produce clear limits and ensure that approaches to speed compliance, which do not rely solely upon sanctions, are fully exploited. To that end it is essential for limits to be clearly identified, look and feel like the limit and communities to participate and embrace speed limits so they are self enforcing.

11. SECTION 11 – 20 MPH SPEED LIMITS OR ZONES

- 11.1 Speed limits are only one element of speed management and local speed limits should not be set in isolation. They should be part of a package with other measures to manage speeds which includes engineering, visible interventions and landscaping standards that respect the needs of all road users and raise the driver's awareness of their environment, together with education, driver information, training and publicity.
- 11.2 Altering a limit with simply a sign without making it clear to all drivers who may use the road will risk high levels of offending with many unaware of their behaviour, which may well have complied if the site/limit was clear. This will simply leave vulnerable road users exposed to unnecessary higher speeds and the police with a large-scale enforcement issue, which cannot be contained. National guidance to local authorities on installing adequately engineered 20mph limits/zones is unambiguous in not supporting unclear or inappropriate 20mph limit/zone or an increased demand on police forces to carryout routine enforcement where there is, in the opinion of the police, insufficient interventions to make the limit obvious to visiting motorists and achieve a high level of self-enforcement.
- 11.3 The Police Service has to ensure all resources are used effectively in responding to community priorities. They should use intelligence on levels and locations of offending to identify persistent and high harm speeding offenders and target their enforcement in all speed limits; however, in those where the drivers' awareness is lowered due to the omission of measures to manage speed there will be no routine enforcement, only that necessary to eliminate persistent high harm speeding motorists.

- 11.4 As with all limits, if the site doesn't look like or feel like the limit imposed then there will be larger scale offending and routine prosecution seen as inappropriate and quite simply over-the-top. It is for local authorities to appropriately sign and if necessary engineer a limit, leaving the police to target the persistent and deliberate offender, together achieving the very highest level of compliance and safety for other road users.

Appendix A

20 MPH LIMITS AND ZONES – EXPLANATION OF REVISED POLICY GUIDELINES

The original speed enforcement guidance 'Joining Forces for Safer Roads' has been updated to sit alongside the new road policing strategy 'Policing the Roads' and the philosophy that we will target high harm deliberate offending. It now includes changes to support the previous position ACPO had on national guidance for 20mph limits and zones, laid out in Traffic Committee minutes - that is, 'routine' enforcement only if the limit is appropriate given the road conditions as well as clarity for drivers who are not local, looking and feeling like a 20mph rather than appearing to be 30 or higher.

POLICE POSITION ON ALL SPEED LIMITS INCLUDING 20MPH

It is important that the police position on all speed limits, including 20mph, is clearly articulated by all:

- Enforcement will be considered in all clearly posted limits, given other priorities, and this will be by:
 1. Targeted enforcement where there is deliberate offending/disregard and the limits are clear;
 2. Where limits are not clear, that is they don't feel like/look like the limit or are on inappropriate roads, they will not be routinely enforced (routinely means regular planned attendance where there isn't intelligence of deliberate offending) only targeted where there is intelligence of obvious deliberate disregard.

It is very important that the service doesn't unintentionally give the impression that the police will not enforce the law. As with all crimes and all speed limits the police will use their discretion when to enforce and how that enforcement might take place. Unclear or even confusing limits (all limits not just 20's) will undoubtedly lead to mistaken offending and any aggressive enforcement risk a loss of public support for the action and more importantly the police service. Enforcement cannot must not, take the place of proper engineering and or clear signing.

INTRODUCTION OF MORE 20MPH LIMITS

There is clearly a Government/Local authority move to introduce more 20mph limits in many of the residential and shopping areas across the country where there are high levels of foot use and similar vulnerable road users. Residential and shopping areas where the road system is predominantly local residential use and not through routes subject to higher vehicle volumes and non-local traffic, may well be suitable for a 20mph limit, but, if not in a road which is restricted (physically) or supported with appropriate interventions (including engineering but not necessarily simply speed limit signs on their own) making it very clear to all motorists using the road or zone that it requires a speed of under 20mph, it will simply result in higher speeds, road danger for those vulnerable users from unaware motorists and a high level of non-compliance where routine enforcement would be inappropriate.

The police service supports reduced limits in areas where there are vulnerable road users as long as this is reinforced by suitable interventions to make the limit more self-enforcing, thereby achieving the goal of slower speeds but, without simply raising the call for more police enforcement and prosecuted motorists (supported in DfT 01/2013).

SITING OF LIMITS OR ZONES

Local Authorities are no longer required to seek approval from Government to apply 20mph speed limits to roads and there is a relaxing of previous high cost engineering. To ensure continuity with any introduction and to maintain the former stipulations for approval, advice has been given to all authorities in Traffic Advisory Leaflet (9/1999) and Circulars (05/1999) and (01/2013).

These documents clearly state 20mph limits/zones should be **self-enforcing** and that their success is dependent upon having in place **speed reducing features**, features that might well be no more than clear signing or other low cost interventions.

Whatever is provided there needs to be of a significant number and appropriate design to reduce the speed of most traffic to 20 mph or less without the need for police enforcement. This leaves the police able to focus on those who decide to ignore the clear limit and risk prosecution.

The Government guidance highlights how the existence of a speeding problem in a 20mph limit/zone may well illustrate the need to re-assess the level of engineering, clarity of the need for 20mph or, suitability of the road for such a reduced limit. This, the guidelines say, should be explored by the local authority, in consultation with the police, before any call for enforcement; prosecuting drivers who simply misread the road and who would have complied if clearly highlighted with interventions such as roundels on the road, gated entries etc., would not be appropriate.

GOVERNMENT CIRCULAR 01/2013

The Government has recently published a circular 'Setting Local Speed Limits'. In this document they highlight key points:

- Speed limits should be evidence-led and self-explaining to seek to reinforce people's assessment of what is a safe speed to travel;
- Encourage self-compliance and seen as the maximum rather than a target speed.

In the document they highlight how speed management is there to create a safe environment and how it should require, encourage and help road users to adopt appropriate and safe speeds below the limit, self-explaining and reinforcing so not unclear or resulting in large scale offending.

Speed limits should not be set in isolation but as part of a package with other measures to manage vehicle speeds and improve road safety, helping drivers to be more readily aware and drive at an appropriate speed.

It is seen as important that traffic authorities work closely with the police when considering or determining any changes to a speed limit. Enforcement is appropriate but only after other measures, and the cost must be considered before introducing or changing a limit.

20 mph limits can be introduced where there are significant numbers of vulnerable road users, however where they do so, general compliance needs to be achievable without excessive reliance on enforcement. Successful limits and zones being self-enforcing, conditions, signing or traffic calming leading to a mean traffic speed which is compliant.

To achieve compliance there should be no expectation on the police to provide additional enforcement beyond routine activity - unless agreed.

GUIDANCE SINCE 1997

Police policy guidance was set in the Traffic Committee meeting July 1997 where limits were considered and then the further meeting in 1/1/98 for zones, as follows:

- In 1997, following force concerns expressed over appropriate enforcement of 20 mph speed limits; a national consultation was undertaken by the ACPO Traffic Committee during July 1997. As a result, the following Prosecution Policy was circulated for forces information.

20 MPH LIMITS – 1997 ACPO TRAFFIC COMMITTEE

Whilst the benefit of reduced speed limits in residential areas is recognised, the means by which such a speed limit is achieved, clearly rests with the advice provided by the department of the Environment, Transport and the Regions (DETR). This advice to local authorities should ensure that sufficient engineering works are in place to result in an average speed of 20 mph or less.

It is not acceptable for the Police service to enforce such speed limits as a matter of routine. In the event that offenders are detected in the normal course of police work, it is recommended that prosecution should be by way of process and that the evidence should reflect the fact that the offence was committed within a reduced speed limit zone.

This will allow Magistrates to impose a more realistic punishment than can be achieved by the issue of a Fixed Penalty Notice.

Whilst the current 5th Edition of the ACPO Prosecution Policy document does not include 20 mph speed limit zones, this advice is circulated in advance of the 6th Edition, which is to be published soon.

This advice does not affect the discretion able to be used in electing the most effective mode of prosecution but is intended to clarify the police stance in relation to enforcement of 20 mph zones.

HOME ZONES – 1998 ACPO TRAFFIC COMMITTEE

A paper was introduced to the committee which explained the concept of Home Zones – a street or group of streets where pedestrians have priority and cars travel at little more than walking pace. The concept had received support in the Government's Transport White Paper and local authorities were free to pilot the idea if they wished. The paper argued that, like 20mph zones, the introduction of Home Zones would depend upon local consultation at community safety fora.

Consultation in one Region identified a view that the police service needed to state its view on such developments. The proposal was that the Committee adopt a common approach to Home and 20mph Zones, insisting on full engineering measures which would minimise the need for speed enforcement.

Members endorsed the position as proposed and it was agreed to inform other emergency services of the Committee's stance. The Chairman would write to the Local Government Association and the County Surveyors Association and set out the Committee's position in regard to both Home and 20mph Zones.

The Committee highlighted how, without a united position which supports 20 mph limits and zones in the right place with the right level of engineering (not inadequate and relying on offending and enforcement for compliance), the police service would undoubtedly become the cheap option to achieve compliance with 20mph limits and zones, certainly if the service start to enforce routinely in inappropriate areas.

It is this position that drove the guidance that the police would enforce and identified specific issues as they did with all other roads, but would not put routine speed enforcement in 20mph limits and zones unless they were in areas where:

- 1. 24mph or less was the norm or,**
- 2. met the DfT guidance by providing a form of engineering that would make it obvious to drivers that they were in this type of limit and should control their speed.**

POSITION IN 2013

The police service supports **all** appropriate speed limits where:

- There is a proven need;
- The limit is clear, looking and feeling like the limit; and
- Motorists have the ability to comply.

In appropriate residential areas, where the road infrastructure is for residential use only (not thoroughfares, feeder or through routes) where the interventions, signing, road paint or engineering, make it clear for any non-local visiting motorist that the limit is 20mph, routine enforcement will be carried out in exactly the same way it is for all other suitable limits/roads. This should however be part of a community commitment to the limit involving residents, local authorities and of course the police. This improves the living environment without high levels of non-compliance or excessive enforcement.

If a 20mph speed restriction is placed on a road or in a zone without suitable intervention such as engineering/clear signing etc., so it isn't clear to all drivers that there is a 20mph limit and there isn't going to be any effectively achievement of high levels of compliance without enforcement; then there should not be routine enforcement, only the targeting of specific issues with persistent or deliberate high speeds, whereby a serious offender would be prosecuted.

Part of this rationale is that if the speed restriction is necessary due to there being vulnerable road users present, compliance must be the objective not speeding vehicles and prosecutions, so engineering not enforcement. If engineering or other suitable intervention, such as roundels or gated entrances, is provided enabling those that wish to comply to do so, then the police will more routinely enforce to ensure compliance from those who are choosing to ignore the obvious limit.

NATIONAL DRIVER OFFENDER RETRAINING SCHEME (NDORS) COURSES

Currently most of the speed equipment deployed is approved for 20mph enforcement. NDORS courses are not offered due to the police position on 20mph limits, that is the looking and feeling like the limit before routine enforcement would take place. If we were to offer courses we would be accepting that the failures to comply were low-level risk/issues, low harm and from drivers who were aware but made a mistake. In fact as enforcement was only on targeted deliberate offenders it would be against high-end deliberate and chosen behavior, not suitable for education.

Speeding in a properly marked/engineered limit or zone would not be suitable for a course, which is built on error and mistaken behavior. In reality 20mph zones/limits are introduced for a specific road safety danger, vulnerable road users, where compliance is the aim, not enforcement. For these reasons it is not currently considered suitable to issue fixed penalty or offer NDORS courses for 20mph offenders.

Should there be a call for courses from the majority of forces using NDORS this will be reconsidered.

SUMMARY OF THE POLICE POLICY GUIDELINES ON 20MPH LIMITS

Speed limits are only one element of speed management and local speed limits should not be set in isolation. They should be part of a package with other measures to manage speeds which include engineering, visible interventions and landscaping standards that respect the needs of all road users and raise the driver's awareness of their environment, together with education, driver information, training and publicity. Deliberate high harm offenders will always be targeted and prosecuted.

Simply altering a sign without making it clear to all drivers who may use the road that the limit is changing, will risk high levels of offending with many, unaware of their behavior, who may well have complied if it looked and felt like the limit. This will simply leave the police with a large-scale enforcement issue, which cannot be contained. National guidance to local authorities on installing adequately engineered 20mph limits/zones is unambiguous in not supporting unclear or inappropriate 20mph limit/zone or an increased demand on police forces to carryout routine enforcement where there is, in the opinion of the police, insufficient interventions to make the limit obvious to visiting motorists and achieve a high level of self-enforcement.

The Police Service has to ensure all resources are used effectively in responding to community priorities. They should use intelligence on offending to identify persistent and high harm speeding offenders and target their enforcement in all speed limits; however, in those where the drivers' awareness is lowered due to the omission of measures to manage speed there will be no routine enforcement, only that necessary to eliminate persistent high harm speeding motorists deliberately offending.

So, the police service position on all speed limits (including 20mph roads) is:

- Appropriate speed limits are supported, so long as they look and feel like the limit giving visiting motorists who wish to confirm that choice;
- The desired outcome has to be speeds at the limit chosen so as to achieve safe roads for other and vulnerable users not high speeds and high enforcement;
- Self-enforcing (with reducing features) not requiring large scale enforcement;

- Only introduce where average speeds are already close to the limit imposed (24 in a proposed 20mph area) or with interventions that make the limit clear to visiting motorists;
- Speeding problems identified in an area must have the engineering, site clarity and need re-assessed, not simply a call for more enforcement; and
- Enforcing against drivers who simply misread the road is not appropriate.