



**Northern Ireland
Assembly**

COMMITTEE FOR REGIONAL DEVELOPMENT

Please use this form to submit written submissions in relation to the Roads Traffic (Speed Limits) Bill. Return to committee.regionaldevelopment@niassembly.gov.uk

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Organisation: (if applicable) PlayBoard NI

Date: 8 May 2015

Dear Committee,

PlayBoard NI welcome the opportunity to make a written submission in relation to the roads Traffic (Speed Limits) Bill. PlayBoard is happy to be considered for oral evidence sessions in relation to the Committee's scrutiny of the Bill

Key points

- PlayBoard is an independent charity, membership organisation and the lead organisation for the development and promotion of children and young people's play in Northern Ireland.
- Research carried out by PlayBoard consistently shows that traffic is a reoccurring concern for children, young people and parents.
- We support the implementation of 20mph speed limit because it will improve road safety but also alleviate the consequential failure of children to acquire the independent mobility they gain through physical, outdoor play.
- Introducing a 20mph speed limit will result in more opportunities to play, reduced health inequalities, improved children's health, reduced obesity and reduced road casualties.
- Lessons learned from elsewhere suggest implementing a 20mph speed limit is best achieved without physical calming measures but rather by focusing on public education campaigns, consultations, signage, signposts or road markings, raising awareness, extensive and sustained social marketing and 'light touch' policing.
- In line with the second ask of PlayBoard's our 'Let us PLAY' campaign, we

believe it is critical that children's voices are taken on board in any community consultations etc. and given due weight in the decision-making process.

1.0 Introduction

- 1.1 PlayBoard is an independent charity, membership organisation and the lead organisation for the development and promotion of children and young people's play in Northern Ireland. Since our establishment in 1985, PlayBoard has been committed to supporting the child's right to play through a combination of: front line service development and delivery; campaigning; awareness raising and working in partnership with others to put play on the agenda of policy makers and resource providers. The organisation takes great pride in promoting best practice in Play, Playwork and play based School Age Childcare services.
- 1.2 PlayBoard's mission is to drive the play agenda, ensuring that at every level of decision making across society, the child's right to play is not only recognised but is made a reality within the lives of children, young people, families and communities. Children and young people's views, aspirations and perceptions of themselves and the environment in which they live, are at the heart of PlayBoard's work. Our vision is of a society where the right to play is realised.

2.0 The Right to Play (Article 31 of the UNCRC)

- 2.1 The importance of the child's right to play is increasingly recognised as being integral to the acquisition and development of skills and competencies as well as promoting enhanced health, well-being and resourcefulness¹. Through play, children can create their own self-protection and to an extent, play is the principal way in which children participate within their own communities. Being able to play is dependent on children having time, space and licence to play, which in turn is dependent on a range of social, cultural, economic and political factors².

The child's right to play is enshrined within Article 31 of the United Nations Convention on the Rights of the Child (UNCRC). This means States parties are obligated to ensure that Article 31 rights are respected, protected and fulfilled. Article 31 states that those acting on behalf of the state should *'recognize the right of the child to rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the arts'*.³

¹ O'Loughlin (2014). Play Matters in D. Schubotz and P Devine (Eds) Not so different Teenage attitudes across a decade of change in Northern Ireland. Belfast: Queens University Belfast

² Lester, S., & Russell, W. (2010). Children's Right to Play: An Examination of the Importance of Play in the Lives of Children Worldwide. Working Papers in Early Childhood Development, No. 57. Bernard van Leer Foundation. PO Box 82334, 2508 EH, The Hague, The Netherlands.

³ United Nations, Committee on the Rights of the Child (2013). General Comment No.17 The right of the child to rest, leisure, play, recreational activities, cultural life and the arts. Geneva: United Nations

In response to concerns raised by the Committee on the Rights of the Child (CRC) that States were consistently failing to adequately recognise the rights contained in Article 31, the CRC released General Comment 17 aimed at clarifying State Party obligations. General Comment 17 contains a number of references to the issue of traffic and its impact on children's lives, the issue of speed, the need to adopt and to introduce 'road traffic measures, including speed limits ... traffic lights, and calming measures to ensure the rights of children to play safely within their local communities'.

2.2 The General Comment is clear: *'A balance is needed between, on the one hand, taking action to reduce the unacceptable hazards in the children's environment, such as closing local streets to traffic ... and on the other hand, informing, equipping and empowering children to take the necessary precautions to enhance their own safety. The best interests of the child, and listening to children's own experience and concerns, should be mediating principles to determine the level of risk which children can experience'*.⁴

2.3 Research carried out by PlayBoard consistently shows that traffic is a recurring concern for children, young people and parents. Traffic volume, and in particular the speed of traffic is a major anxiety for parents and is often seen as a barrier to children being able to play outside in the street or in their wider neighbourhood.

During the summer of 2013, PlayBoard worked with a group of 10 Young Researchers aged 8-12 who interviewed 111 of their peers. In their findings, 33% of children reported their favourite things to play were *'traditional playground/street games'*, however a typical comment included *'It's not safe because cars are driving up and down the street and people are parking their cars on the footpath'*. 1 in 5 children interviewed said they did not have a safe place to play outside and cited cars and traffic as being a major inhibitor. Some of the recommendations made by children to policymakers included:

- Provide more zebra crossings and restrict cars in areas where children play;
- Close off some streets and roads for children to play in on a temporary basis; and
- To have community police on our street who understand the importance of play, to help us feel safe.⁵

Road safety is undoubtedly a significant issue. It is however important to recognise that limiting opportunities to play purely on road safety grounds can lead to a consequential failure of children to acquire the independent mobility they gain through physical, outdoor play.

⁴ ibid

⁵ PlayBoard (2014) Young Researchers Investigate Article 31 2013 available at <http://www.playboard.org/wp-content/uploads/2014/11/yrreport.pdf>

PlayBoard is in little doubt that a 20mph speed limit in residential areas will help children and parents to feel safer and less anxious and will also contribute to improving children's lives, their growth and development, their health and wellbeing, their level of physical activity and general competence.

3.0 We support the implementation of 20mph speed limits because...

- 3.1 As the lead organisation for the child's right to play, our primary concern is to ensure that the environment including streets and wider neighbourhoods are safer, thus enabling increased opportunities for outdoor play within the community. Traffic moving at a slower pace will in our view help to achieve this, enabling children to move more freely and safely within their local neighbourhoods.

It is worth noting that there are examples of 20mph speed limits in residential streets in Northern Ireland (Finaghy, Belfast is one example). We would urge the Committee to be mindful that the 20mph speed limit is operational and that there are opportunities to learn from what are effectively 'pilots'. Indeed a growing body of evidence is supporting the shift from 30mph to 20mph speed limits as a mechanism to improve children's lives. The policy makes sense on many fronts.

- 3.2 **20mph means more opportunities to play.** The main reason PlayBoard wants to see safer streets with less and/or slower moving traffic is to enable children to have increased and better opportunities to play and ultimately to enjoy their childhoods. By enabling increased outdoor play opportunities children have been shown to gain a significant range of benefits including improved health and wellbeing, the enhancement of skills and learning opportunities and connection to the wider community.

- 3.3 To reduce **health inequalities**: In Professor Danny Dorling's⁶ contribution to 'If you could do one thing' he choose to set out why 30mph speed limits should be replaced by 20mph. A small excerpt gives a sense of his perspective

'if you want to do just one thing, then the thing you can actually do ... the thing that makes a difference that you can feel, see and measure straight away, is to stick a sign that says 20mph on a circular piece of plastic over the 30mph signs where you live. And, fortunately, it is now (almost) as easy as that'

- 3.4 **20mph improves children's health.** Just recently, the National Institute for Health and Care Excellence (NICE) released a briefing⁷ which included a recommendation: to implement '20mph zones, with priority given to

⁶ Barnardos and Transport 2000 (2004). Reduce Speed Now Stop Look and Listen: Children talk about traffic <http://www.barnardos.org.uk/traffic.pdf>

⁷ Dorling, D. (2014). 20mph speed limits for cars in residential areas, by shops and schools. *IF YOU COULD DO ONE THING...*, 44. http://www.cepar.edu.au/media/123539/if_you_could_do_one_thing_-_final_report.pdf#page=46

protecting children and young people in disadvantaged areas who face the greatest risk'. Their briefing is clear that introducing 20mph limits 'could lead to a 100% return on investment in the first 12 months'.

And help reduce obesity. Research has consistently shown that our society is facing a childhood obesity epidemic. Study after study concludes with stark warnings that our children and young people need to be more active. Just this month Fit for Sport⁸ released their report detailing the state of activity among primary school children. They found that 67% of children did not meet the recommended fitness level for their age-range. It is our belief that the simplest way for children to increase their level of daily activity is to be able to play safely in their neighbourhoods and to experience the resulting health, learning and life-skill outcomes.

- 3.5 **20mph lesson road casualties.** One of the key problems for children when dealing with traffic is that they judge traffic differently to adults. Research has found that children may not be able to detect vehicles approaching at speeds in excess of 20 mph. The combined implication of their research found that driving in excess of 20 mph in a residential or school area not only increases the potential severity of any impact with a pedestrian, but also increases the risk that a child will injudiciously cross in front of the vehicle.⁹

4.0 **Implementing 20mph lessons emerging from experience**

- 4.1 Many cities across England - including Bristol, Liverpool and Portsmouth - have adopted and embraced 20mph speed limits. The approach adopted has been to implement a 20 mph limit supported by public education campaigns and consultations, signage, signposts or road markings, raising awareness through advertising in local media plus local authority officer time. 'Light touch' policing has also been used to enforce new limits.

Such approaches contrast to more expensive physical calming measures which have been shown to result in patchy and isolated implementation and success. The likely repercussion of physical measures has been shown to be a reinforcement of faster speeds on the rest of the urban and residential network, speeds which are overly excessive for the mix of road users in such areas.

To implement a 20mph limit that is self-enforcing will however require more than just "signs on sticks". A focused awareness raising campaign Education, engagement and making the benefits tangible are crucial. For example leading 20mph limit implementers (e.g. Bristol and Liverpool) have substantial Public Health involvement. They have marketed the benefits of

⁸ Fit for Sport (2015) Challenging children's inactivity

http://www.activitychallenge.co.uk/bundles/fitforsportchallenge/challenge/ChallengingInactivity_FitForSport_220415.pdf

⁹ Wann, J. P., Poulter, D. R., & Purcell, C. (2011). Reduced sensitivity to visual looming inflates the risk posed by speeding vehicles when children try to cross the road. Psychological science.

<http://www.20splentyforus.org/UsefulReports/PsychSciVisualAcuity.pdf>

20mph limit (for example, stopping at 20mph in roughly half the distance compared to 30mph). This is central to compliance and public satisfaction.

- 4.2 **Cross Party Support is a critical starting point.** At second stage, the Road Traffic (Speed Limits) Bill achieved cross party support in the Assembly. This clearly shows there is a consensus that a 20mph speed limit in residential areas is an important issue for the electorate.
- 4.3 **Reducing community street limits to 20mph is as much about changing social behaviour as traffic engineering.** The experience in England and other European countries has been to gain community acceptance and ownership. This is helped by having buy-in from a wide range of agencies, including traffic, health, education, police and other services. For example messages from public health communication experts are likely to be more effective than transport planners alone.
- 4.4 **Engagement before road signs change.** Instead of imposing speed limits from the outset, the recommended approach is to consult with residents and community interest groups and to give local communities opportunities to shape policy. We are unequivocal that children's opinions and perspectives should be taken on board and given due weight within the decision-making process.
- 4.5 **Extensive, sustained social marketing.** Heavily promoting via social marketing the benefits of reduced traffic speeds helps to support motorists to understand how and why a 20mph speed limit improves safety, health and community life. Research suggests that a multi-agency approach with a designated budget of at least 10% of the capital installation costs is recommended for maximum public engagement.¹⁰

Furthermore, **market research has been shown to be critical to clearly identifying those messages that are most effective in motivating drivers to go slower.** For example, Liverpool City Council's social engagement partner found in market testing that the best motivation was 'safer for children' and used The 20 Effect people banner logo. "Slower Speeds, Safer Streets" is their tagline.

- 4.6 **Occasional light touch enforcement.** This would be on top of extensive engagement. We would not see this as an additional cost to the Police budget since there are the same number of roads and drivers as before (when enforcing a 30mph limit).

¹⁰ Toy, S. (2012). Delivering soft measures to support signs-only 20mph limits.
<http://bristol20mph.co.uk/sites/default/files/documents/20mph%20Research%20Findings.pdf>

5.0 Conclusion

PlayBoard fully support the proposed bill on the basis that the introduction of 20mph speed limits in residential and urban areas will create safer streets enabling communities to benefit from safer, quieter and cleaner streets.

From a play perspective, reduced speed limits would go some way to addressing the fears of parents and children which currently restrict outdoor play opportunities for many.

From an economic perspective, the introduction of 20mph speed limits represents a less expensive approach to physical solutions such as speed bumps. By allying the introduction of reduced speed limits with educational and awareness raising approaches, drivers understanding of the need to reduce their speed for the benefit of the whole community can be enhanced leading to safer streets for all.

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