

**CABINET MEMBER FOR HIGHWAYS, TRANSPORT AND WASTE –
CLLR BRIDGET WAYMAN**

HIGHWAYS AND TRANSPORT SERVICE

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REFERENCE: HTW- 17- 17- SPEED LIMIT – WOOLLEY GREEN 40 MPH

SPEED LIMIT – WOOLLEY GREEN 40 MPH

Purpose of Report

1. To consider the comments received following the formal advertisement of speed limit changes at Woolley Green, Bradford on Avon and to recommend an appropriate way forward.

Relevance to the Council's Business Plan

2. The proposed Traffic Regulation Order (TRO) meets two of the priorities in the Council's Business Plan 2017-2027.
 - Priority 2 – Strong Communities (Reduced road casualties, Reduced risk of floods, Healthier population, Good Countryside access and cycling and walking opportunities).
 - Priority 3 – Protecting the vulnerable (Reduced social isolation and loneliness).

Background

3. Following concerns raised by local residents in early 2017 about the number of collisions and the impact that traffic is having on the B3105 at Woolley Green, a commitment was given by the then Cabinet Member for Highways and Transport to investigate matters further.
4. An assessment by officers was subsequently undertaken and a resultant Site Assessment Report was prepared. The report recommended a number of measures to improve the B3105 at Woolley Green, one of which was a lowering of the speed limit from the current 50 mph to 40 mph. A copy of the report is included at **Appendix 1**.
5. A number of comments from local residents were received upon publication of the report, in particular that the speed limit should be reduced to a level lower than the proposed 40 mph. In order to enable more widespread views to be sought it was agreed to proceed to the full TRO advertisement for the proposed speed limit change.

Summary of Proposals

6. The supporting TROs were formally advertised for comment on 4 August 2017. The Council's closing date for receipt of objections or other representations, together with the grounds on which they were made, was 30 August 2017.

Summary of Responses

7. During the advertisement period a total of 52 matters of comment were received. A full summary of the responses received, together with officer responses, where considered appropriate, is included at **Appendix 2**. Details of the commentators are provided in **Appendix 3**.

Main Considerations for the Council

8. Responses to the main points of comment made are set out below.

Substantive comment - Collision history

9. Since the publication of the Assessment Report the collision referred to in paragraph 3 of the report that took place on 23 January 2017 has been added to the Police database and has been categorised as serious. This brings the total number of recorded collisions at Woolley Green to four in the last three years. However, detailed investigation of the causation factors indicates there are no common factors in evidence. The location does not currently meet the threshold level for action from the Council's Safety Schemes budget.
10. Comment is made that there is an under reporting of the number of collisions that have taken place at Woolley Green. The Council's monitoring of collisions on the highway network and identification of sites for remedial action are based on the 'Road Safety Code of Good Practice' recommendations. For this we use the Police collision database that records all collisions on the highway involving personal injury. Damage only collisions are not recorded on the database and are not therefore taken into consideration. This is standard practise across all Highway and Police Authorities in the United Kingdom.
11. Local residents have provided photographic evidence of a number of collisions that have occurred at Woolley Green but are not recorded on the Police database. This is not considered unusual as it is recognised nationally that statistically for every recorded personal injury collision there are up to twelve damage only collisions.

Substantive comment – Level of speed limit

12. Comment is made that the proposed 40 mph limit is too high and that a 30 mph limit should be provided. The reasons for the choice of 40 mph as the proposed speed limit are fully explained in paragraphs 5 to 15 of the Site Assessment Report. It is clear that the criteria set by the Department for Transport for a lower level of restriction is not met. It is noted however that the geometric layout of the double bend provides a controlling feature to modify vehicle speed with driven speeds noted to be at or below 25 mph.
13. As identified in the Assessment Report the developed length of Woolley Green only extends over a length of approximately 250 metres. The absolute minimum length of a speed limit is set at 300 metres but should ideally be over a length of 600 metres. A 30 mph limit covering the developed length would therefore be too short. If the limit were to be extended to a length between 300 and 600 metres the terminal signs would not align with the start of the development and it is then unlikely that drivers would modify their speed at these points as they do not see the need to do so. DfT advice is that 30 mph terminal signs are sited at the start of the development so that drivers see the need to modify their speed at the same time as seeing the development.
14. A key factor when setting speed limits is how the road looks to users and the cognitive feedback it provides to drivers, key factors includes its geometry and the adjacent land use. Drivers are likely to expect and respect lower limits, and thus be influenced on the appropriate speed, where they can see and react to potential hazards, for example, outside schools, residential areas or villages and in shopping streets.

15. If a speed limit is set in isolation, or is unrealistically low, it is likely to be ineffective resulting in high levels of non-compliance and overall disrespect for the speed limit. As well as requiring significant, and avoidable, enforcement costs, this may also result in substantial numbers of drivers continuing to travel at unacceptable speeds, thus increasing the risk of collisions and injuries.
16. It is a common misconception that an effective method of resolving concerns regarding poor adherence to a limit is the introduction of a lower limit. In truth, the reduction in the limit will only serve to exacerbate the problem and can result in further issues, including an increased onus on the Police to provide effective enforcement.
17. DfT Circular 01/13 advises that speed limits should not be used to attempt to solve the problem of isolated hazards, for example, a single road junction or reduced forward visibility such as a bend, since speed limits are difficult to enforce over such a short length. Other measures, such as warning signs, carriageway markings, junction improvements, super-elevation of bends and new or improved street lighting, are likely to be more effective.
18. It is considered vital that speed limits are set in accordance with DfT guidance to ensure consistency across the overall Highway Network with the aim of achieving improved respect and subsequent compliance.

Substantive comment - Extent of speed limit

19. A number of commenters have suggested that a 40 mph limit should be introduced on the length of the B3105 from Woolley Green to the Forewood Common junction.

DfT Circular 01/2013 Setting local speed limits advises the following for rural roads:

50 mph limit - Should be considered for lower quality A and B roads that may have a relatively high number of bends, junctions or accesses.

40 mph limit - Should be considered where there are many bends, junctions or accesses, substantial development, a strong environmental or landscape reason, or where there are considerable numbers of vulnerable road users.

20. It is clear that this length of the B3105 best fits the 50 mph criteria. This is supported by on site observation of actual driven speeds that best fit with a 50 mph limit and that the introduction of a 40 mph limit would result in a high number of vehicles continuing to drive above the posted limit.

Substantive comment – additional signing

21. Comment is made on the need to enhance the existing signing provision to ensure that drivers are aware of the circumstances at Woolley Green. This point was also identified as part of the Assessment Report.
22. A proposal plan showing sign, road marking and other changes is included at **Appendix 4**. The works to deliver these changes will be undertaken at the same time as the introduction of any speed limit changes to ensure that both elements provide a coherent message to motorists.
23. Suggestions for the use of Vehicle Activated Signs (VAS) are also made. However, this is not recommended as evidence both locally and nationally strongly suggests indicates that whilst the initial impact on drivers is good, the longer term effectiveness of VASs,

particularly those relating to vehicle speed, is quickly eroded resulting in increased driver apathy. As a result, Wiltshire Council targets the use of such signs to those sites with particular difficulties that conventional static signing alone has not resolved and typically relate to a specific hazard such as a crossroads or junction.

Overview and Scrutiny Engagement

24. Not applicable.

Safeguarding Implications

25. There is no risk to the Council as a result of these proposals.

Public Health Implications

26. Any achieved reduction in vehicle speed may be considered to have the benefit of reducing air borne pollution and improving air quality.

Corporate Procurement Implications

27. There are none with this proposal.

Environmental and Climate Change Considerations

28. The installation of speed limit signs and posts, particularly repeater signs where none previously existed, together with road markings and coloured surfacing could be considered detrimental to the visual vista and street scene.

Equalities Impact of the Proposal

29. There are none with this proposal.

Risk Assessment

30. If schemes, programmed for design or delivery within the current financial year, are not progressed the Council risks the potential of delayed delivery in subsequent years due to other funding demands and uncertainty of future budget.

Financial Implications

31. The on ground speed limit changes will be funded from the Local Transport Plan Integrated Transport allocation. Failure to proceed with the project may leave funding unallocated and subject to underspend within the current financial year.

Legal Implications

32. There are none with this proposal.

Options Considered

33. To:

- (i) Implement the advertised changes.
- (ii) Amend the proposals in line with the received comments
- (iii) Abandon the proposals and retain the existing restriction.

Reason for Proposals

34. The proposals have been assessed and are in accordance with the guidance provided by the Department for Transport, Circular 01/13 'Setting Local Speed Limits', with the aim of achieving improved respect and subsequent compliance with the limits.

Proposals

35. That:
- (i) The proposals be implemented as advertised.
 - (ii) The objectors be informed accordingly.

The following unpublished documents have been relied on in the preparation of this Report:

None