

Record of operational decision

Decision title:	Decision to not implement a 20mph Speed Limit on Broad Street, High Street & Twyning Street, Bromyard.
Date of decision:	5 th July 2024
Decision maker:	Service Director for Environment and Highways
Authority for delegated decision:	Economy and Environment Scheme – Highways and Transport 75. To act on behalf of the council in respect of the legislation specified in the Road Traffic Regulation Act 1984. The authorisation limit is within the financial procedure rules and is sufficient for the decision and that the officer has authority under the contract procedure rules.
Ward:	Bromyard Bringsty, Bromyard West
Consultation:	<p>Following the completion of the initial assessment, a Formal (Statutory) Consultation process was undertaken from 16th June 2023 to 7th July 2023, whereby a consultation letter and proposal plan were sent to all Statutory Consultees via email. During this process, two objections were raised in relation to the 20mph speed limit proposal as part of this TRO. A summary of the responses received during the Formal (Statutory) Consultation process is included as Appendix C. The responses from Statutory Consultees are also summarised below.</p> <p>Bromyard & Winslow Town Council – Objects to the proposal.</p> <p>Traffic Management Advisor (TMA), West Mercia Police – Offered no objections to the proposals.</p> <p>Bromyard West Local Member – Supports the proposal.</p> <p>Bromyard Bringsty Local Member – Objects to the proposal.</p> <p>Hereford and Worcester Fire and Rescue Service – Offered no objections to the proposals.</p> <p>Road Haulage Association – Issued no response to the consultation.</p> <p>Freight Transport Association – Issued no response to the consultation.</p> <p>West Midlands Ambulance Service – Issued no response to the consultation.</p> <p>BBLP Locality Steward – Offered no objections to the proposals.</p>
Decision made:	Following a site audit, assessment and consultation with the Statutory Consultees, a new speed limit order is not considered an appropriate course of action as it is felt that the current speed limit is appropriate for the section of road under investigation and there is a lack of local support for the proposal.
Reasons for decision:	<p>The scheme originated in response to a request from local stakeholders in relation to the Extra Ordinary Market Town Fund. There was a requirement to investigate the suitability of a 20mph speed limit on Broad Street, High Street & Twyning Street, Bromyard, and whether it was feasible to introduce a lower speed limit.</p> <p>An on-site assessment was undertaken in April 2023. During the assessment, officers considered the appropriateness of a reduced speed limit considering the surrounding environment and road geometry.</p>

Department for Transport's (DfT) 'Setting Local Speed Limits' document states that when considering reducing any given speed limit, the surrounding roadside environment is of paramount importance stressing that a principle aim in determining suitable speed limits should be to provide a consistent message between the speed limit and what the road looks like/the surrounding environment. DfT guidance also states "Traffic authorities can introduce 20mph speed limits or zones on major streets where there are – or could be - significant numbers of journeys on foot, where pedal cycle movements are an important consideration, and this outweighs the disadvantage of longer journey times for motorised traffic. It also states that there must be community support for such a proposal.

When assessing the road characteristics and its surrounding environment it was clear that there were a significant number of journeys on foot, with the footway on both sides of the carriageway and several movements across the carriageway between these.

Another key factor in the 'Setting Local Speed Limits' document for consideration is 'current traffic speeds'. Vehicle speeds were noted to be low during the site visit. Two Automatic Traffic Count (ATC) Surveys were undertaken. Speed data comprising 85th percentile speeds and mean speeds (mph) are summarised in the table below and shown in Appendix B.

	85%	Mean
ATC 1	18.5	13.5
ATC 2	19.1	15.1

The data shows existing vehicle speeds are significantly below Association of Chief Police Officers (ACPO) guideline intervention level for a 20mph speed limit of 24mph. These low speeds show that drivers in general are driving to the existing conditions of the road, and shows that if a 20mph speed limit was implemented here, there would likely be a high likelihood of compliance.

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During this consultation process, the Local Member for Bromyard Bringsty and the Bromyard & Winslow Town Council stated that they did not support the proposal. They both stated that they did not know where the request came from, and it had not been requested by them. They both also questioned what would be achieved by introducing a 20mph speed limit on Broad Street & High Street given that the speeds were already very low. Considering regulations, according to the Road Traffic Regulation Act (RTRA) 1984, it is the duty of a highway authority to 'manage their road network' and 'to improve road safety'. Section 122 of the RTRA 1984 states that local authorities must, so far as is practicable, exercise their functions under the RTRA so as to 'secure the expeditious, convenient and safe movement of traffic'.

In conclusion, it is evident from an on-site assessment, consideration of national guidance & existing vehicle speeds that the proposed 20mph speed limit on Broad Street & High Street is feasible. However, DfT Setting Local Speed Limits Document states that these schemes should only be introduced where there is community support. Therefore, given that the Bromyard & Winslow Town Council and Bromyard Bringsty Local Member do not support the proposal, as elected representatives of the community, it is recommended that a new Speed Limit Order should not be progressed any further.

The above recommendation is in alignment with guidance set out by Department for Transport and would not be of detriment to the council's duties under Section 122 of the Road Traffic Regulation Act 1984.



Appendix D -
EINA.docx



Appendix C.pdf



Appendix B.pdf



Appendix A.pdf

Highlight any associated risks/finance/legal/equality considerations:

Community impact

The recommendation not to make any change to the existing speed limit on Broad Street, High Street & Twyning Street, Bromyard, will have no impact on the local community as the speed limits will remain unchanged on site and the existing vehicle speeds are already below the speeds required for a 20mph speed limit.

Environmental Impact

Herefordshire Council provides and purchases a wide range of services for the people of Herefordshire. Together with partner organisations in the private, public, and voluntary sectors we share a strong commitment to improving our environmental sustainability, achieving carbon neutrality and to protect and enhance Herefordshire's outstanding natural environment.

The adoption of these recommendations will not have a negative impact on the environment.

Equality duty

The public sector equality duty (specific duty) requires us to consider how we can positively contribute to the advancement of equality and good relations and demonstrate that we are paying 'due regard' in our decision making in the design of policies and in the delivery of services.

The recommendations set out in this report are considered to be low impact with regards to equality thus paying regard to the council's duty according to the Equality Act 2010 as set out below.

Under section 149 of the Equality Act 2010, the 'general duty' on public authorities is set out as follows:

A public authority must, in the exercise of its functions, have due regard to the need to -

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Any impact as a result of the scheme will be equal to all parties.

See Appendix D of this report for Equality Impacts and Needs Assessment (EINA).

Resource implications

The cost of this TRO scheme to date is £1800. This cost has been identified from the Extra Ordinary Market Town Fund.

Legal implications

The introduction of a new TRO is not recommended as part of these proposals.

There are no further legal requirements in not making the TRO, even if objections are made. It is at the discretion of the Council as the Highway Authority whether to make a TRO dependent on the justification for doing so.

	<p>Risk management</p> <p>The Local Transport Plan sets out to reduce the number and severity of casualties on the highway network in Herefordshire and provide a highway network that is safe and efficient. A Key Performance Indicator is contained in this Local Transport Plan and details a locally set target for a reduction in fatal or serious injuries on the highway network. The adoption of the recommendations in this report would have no impact to the objectives in the Local Transport Plan.</p>
<p>Details of any alternative options considered and rejected:</p>	<p>To implement a 20mph speed limit on the Broad Street, High Street & Twyning Street – This is not recommended for a number of reasons outlined in detail in the Key Considerations section of this report. In brief, the surveyed 85thile vehicle speeds on Broad Street & High Street are significantly below the existing 30mph speed limit and a signed 20mph speed limit is unlikely to further sufficiently lower vehicle speeds. Additionally following consultation with the Statutory Consultees, it is apparent that there is a lack of support from both the Town Council and one of the Local Members. Therefore, given that speeds are already below the 20mph speed limit and the lack of local support, it is not recommended to introduce the proposed 20mph speed limit.</p>
<p>Details of any declarations of interest made:</p>	<p>None</p>

Signed..... Date:

Please ensure that signatures are redacted before publishing.