

OFFICER DECISION REPORT - TRAFFIC REGULATION ORDER (TRO)

4

OUTCOME OF TRO PROCESS – OBJECTIONS RECEIVED

PREPARED BY: Traffic Management Team, Highways and Traffic Group

TITLE OF REPORT: A431 Kelston Road / Newbridge Hill

PROPOSAL: 20 M.P.H Speed Limit

SCHEME REF No: 26-027

REPORT AUTHOR: Gina West

1. DELEGATION

The delegation to be exercised in this report is contained within **Part 2 Section 2.35** of the Constitution under the **Delegations of Functions to Officers**, as follows:

Section A	The Chief Executive, Executive Director - Chief Operating Officer, Directors and Heads of Service have delegated power to take any decision falling within their area of responsibility...."
Section B	Without prejudice to the generality of this, Officers are authorised to: serve any notices and make, amend or revoke any orders falling within their area of responsibility.
Section D	An Officer to whom a power, duty or function is delegated may nominate or authorise another Officer to exercise that power, duty or function, provided that Officer reports to or is responsible to the delegator.

For the purposes of this report, the Director of Place Management and the Head of Highways Delivery hold the delegated power to make, amend or revoke any Orders.

2. LEGAL AUTHORITY

This proposal is made in accordance with the Road Traffic Regulation Act 1984, which under Section 1 provides, generally, for Orders to be made for the following reasons, and in the case of this report specifically for the reason(s) shown below:

(a)	for avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising, or	X
(b)	for preventing damage to the road or to any building on or near the road, or	
(c)	for facilitating the passage on the road or any other road of any class of traffic (including pedestrians), or	

(d)	for preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property,	X
(e)	(without prejudice to the generality of paragraph (d) above) for preserving the character of the road in a case where it is specially suitable for use by persons on horseback or on foot, or	
(f)	for preserving or improving the amenities of the area through which the road runs, or	X
(g)	for any of the purposes specified in paragraphs (a) to (c) of subsection (1) of section 87 of the Environment Act 1995 (air quality)	

3. **PROPOSAL**

To introduce a 20 mph speed limit on the A431 Kelston Road just northwest of Oldfield School continuing on Newbridge Hill to its junction with A4 Upper Bristol Road.

4. **REASON**

Please refer to the Statement of Reasons.

The Council has had in mind and discharged the duty (as set out in section 122(1) of the Road Traffic Regulation Act 1984) to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) so far as practicable. It has also had regard to the factors which point in favour of imposing a 20mph speed limit at A431 Kelston Road / Newbridge Hill. It has balanced the various considerations and concluded that it is appropriate to promote the 20mph speed limit. The Council has also considered and discharged its network management duty under section 16 of the Traffic Management Act 2004. It has concluded that the proposed 20mph speed limit is consistent with that duty, having regard to its other policies and objectives.

5. **IMPACT ON EQUALITIES**

An Equality Impact Assessment has been undertaken in relation to the introduction of traffic management measures, which is available upon request. The Council has had due regard to the needs set out in section 149(1) of the Equality Act 2010. It considers that the proposed Order is consistent with the section 149 public sector equality duty, which it has discharged.

6. **IMPACT ON HUMAN RIGHTS**

The proposals are considered to have a minimal impact on human rights (such as the right to respect for private and family life and the right to peaceful enjoyment of property). However, the Council is entitled to affect these rights where it is in accordance with the law, necessary (in the interests of public safety or economic well-being, to prevent disorder and crime, to protect health, or to protect the rights and freedoms of others), in pursuit of a legitimate aim and proportionate to do so. The proposal(s) within this report are considered to be in accordance with the law, necessary, in pursuit of a legitimate aim and proportionate.

7. SOURCE OF FINANCE

The scheme is included in the 2026/27 Local Active Travel and Safety Programme.

8. CONSULTATION REQUIREMENT

The proposal requires consultation with the Chief Constable, Emergency Services, Road Haulage Association, Freight Transport Association (Logistics UK), Parking Services, Waste Services, Ward Members and the Cabinet Member for Sustainable Transport Delivery.

The responses to the informal consultation can be found in TRO report number 3.

9. OBJECTIONS / COMMENTS RECEIVED (following the public advertisement of the proposal(s))

The comments received have been recorded below with an officer response to the objections in italics underneath.

7 Support / 2 Partly Support / 3 Objection

- I am responding on behalf of 20s Plenty Bath.

BANES councillors unanimously supported Vision Zero in 2023. This accepts that humans make mistakes and we need a transport system that minimises the chances of death and injury when those mistakes occur.

Safe speeds is a key plank of Vision Zero. Although the ‘signs only’ approach has limitations, the resultant reduction in driver speed is still significant. This approach was tested in Wales at scale. Today, 11 people alive there who would otherwise be dead if the previous trends in 30mph areas had continued.

Put simply, the less energy that is taken into a collision, the fewer tragic outcomes there are and the lesser the injuries that do occur. That is people, their families, friends, and communities spared.

Every road in Bath is one where all forms of transport mix: people walking, wheeling, cycling, scooting, on motorbikes, driving vehicles. Desire lines criss-cross our city everywhere. It is a busy, slightly chaotic environment, where people are going to make mistakes. For instance, driving a vehicle whilst scrolling on social media is a mistake. Slower speeds make allowances for those errors.

The Department for Transport Circular 01/2013 states speed limits should be: “evidence-led and self-explaining”. We have plenty of evidence of the benefits of 20mph. In terms of “self-explaining” the current situation where the speed limit can yo-yo on similar looking roads is not a good situation for anyone, especially drivers (examples on our website <https://bath20mphcity.org/>). A consistent speed limit across a wide area provides the most coherent message to everyone of what is expected at a system level, delivers the best value for money and the best overall compliance (verses a fragmented approach).

In summary, the sooner we get to a situation where the presence of street lights is a key visual cue to people that they are in a 20mph area (unless otherwise signposted), the better. Bath is 95% of the way there already, with 9 miles (of 159) remaining at 30mph by April 2027.

The new National Road Safety Strategy proposes significant targets to reduce road death and injury. BANES itself has many policies which are supported by lower speeds, including on:

- Clean air- Lower speeds reduce brake wear and consequent dust
- Connected communities- Lower speeds make it easier for people to cross roads
- Active travel- Lower speeds provide safer spaces for people to walk, wheel and cycle
- Public health- Lower speeds enable active travel, benefitting physical and mental health
- Safe routes to school (our view is safe speeds should cover 500m from the gate of all schools)

We urge the council to make the TRO decision with consideration to the full context of their policies and objectives. A measure such as 'how many people have died on this stretch of road' fails to capture the full context ie. we know people are being killed and injured in near identical circumstance elsewhere in the system.

Measures of average/mean/85% percentile speeds similarly fail to reflect the level of concerns around road danger, concerns that fill Councillor inboxes on a daily basis. We cannot hold off on safer speeds on the grounds that drivers are not driving sufficiently close to limits yet to be introduced. There is a rolling programme of physical changes being delivered to give appropriate visual cues, for instance new crossings (eg. Bottom of Old Newbridge Hill), anti-slip surface treatments, and protected cycle lanes.

We would like to encourage BANES to look at further methods to adapt the road environment to engender safer behaviours, for instance:

- Working with the Tree Officer to add street trees and SUDS features
- Not renewing centre road markings ('naked streets' principle)
- Narrowing lanes by moving parking away from the kerb (notably on Newbridge Road)
- Commissioning murals on concrete 'A-Road' style structures eg. Retaining walls next to roads
- Having a policy of 'humped' crossings as the default design eg. Humped zebra crossings
- Continuing the policy of narrowing junction splays ('bell mouths') and adding 'build outs' wherever possible
- Embracing the opportunity for side-road zebra when that materialises
- Deploying footway level crossings at some side road (as seen on Upper Bristol Road)
- Fitting technology to council vehicles to ensure speed limits are not exceeded

- Making technology to limit speed and monitor driver behaviour a requirement when new contracts are tendered (as found in supermarket home delivery vehicles)
- At signals, advanced green for cyclists as the default design
- Looking at the recently introduced 'cycle street' in Cambridge to see if a similar approach can be applied to Bath eg. on Weston Road or Walcot Street

30mph in places where people live, work and play is akin to indoor smoking. We will look back with shaking heads and think "how on earth did we tolerate that for so long?".

We commend this TRO and urge councillors and officers to bring the benefits of safe speeds to all urban areas of BANES as soon as possible.

Bath 20mph City
Local branch of 20s Plenty

- I support the proposal but like to know how the council are going to implement and monitor the new 20 mph speed limit. Is the council going to put speed bumps on the road or traffic speed cameras?

Apsley road has a 20 mph limit, the vast majority of houses along the road have young children, but there is NO enforcement. No speed humps, no cameras.....the result is that 20 mph is totally ignored!!!

There is no point reducing the speed limit UNLESS it is enforced!!!

- Yes, great idea to reduce speeds in the area.
- We fully support the change to 20mph on this road. Please ensure lots of comms and new signage is in place.
- Living on Newbridge Hill it is my strong belief that steps need to be taken to reduce traffic speeds. The straightness, width and lack of kerbside parking along much of the road, along with no speed signs at all, seem to encourage some drivers to assume the national speed limit applies. This is through an area which includes two schools, accommodation for people with learning difficulties (deaf and vulnerable), access to NHS mental health facilities, and a busy GP surgery/pharmacy. To boot, there are narrow pavements too on one side of the road. Often pedestrians have to step into the road to avoid others, In addition to all this, where there is some on-street parking, traffic has to weave and dodge, often due to the speed it has attained! It remains to be seen whether motorists adhere to any new limit, but certainly having one in place is a necessary first step and will bring the area into line with adjacent roads (e.g. Combe Park). I believe it will encourage pedestrians, the elderly, cyclists, parents with prams, and wheelchair users to feel safer on this stretch of road.
- Fully support reducing speed limit. This road can be a challenge to cross safely and is main route for young children to get to and from school.

- I put my comments in the wrong consultation, please read the comments as in 26-026. This objected to the reduction to 20mph on the basis that it will not help safety and that at the moment traffic self-regulates due to the parked cars. A better idea to help the safety of pedestrians would be to have crossing points at the points where people naturally cross. This is near Old Newbridge Hill, Newbridge Surgery and the mini-roundabout. The junction with Old Newbridge Hill is also dangerous for cars due to the poor visibility and the bad vehicle placement. These issues will still exist with the speed limit at 20mph as that is the usual speed of most of the vehicles when people are crossing in these locations because of the volume of traffic, junctions and parked cars. It seems like a waste of resources to change the speed limit to 20mph whilst not actually solving the problem which you are proposing to fix.
- I fully agree with the reduction in the speed limit on Kelston Road from 30 to 20 mph but must insist that the change is vigorously enforced to ensure that it is not a purely cosmetic political endeavour (eg Penn Hill Road 20mph zone). Further, as a daily pedestrian in the city measures must be included to reserve pavements/walkways/footpaths/footways [please note the Highway Code's use of the word "pavement" and the increasingly ambiguous use by Others wishing to circumvent the rules of their other descriptions!] for pedestrian (and other authorized users) ONLY. For example, their use by e-scooters and e-bikes as 'storage' locations when their actual use is prohibited (by law?) on them. Mobile or static use is the same use! So please go ahead with the speed limit change BUT enforce it and also provide Pedestrian Safety rules and enforcement. Read the Highway Code regarding pavement parking and you will see that there is a requirement for Local Authorities to identify by signage those places where it is permitted.
- I support the proposal of introducing a speed limit in this area to make the area a safer space for pedestrians and cyclists.
- There is zero need for this.
- I am a daily user and works at the RUH.
This road is a major route exiting RUH from Combe Park, where traffic is already held due to doubly parked cars on Combe Park. Ambulance and double-decker bus struggles through Combe Park and roundabout onto Kelston Road A431. By turning this route into 20mph, traffic will queue backwards uphill towards Combe Park, causing difficulties for emergency services i.e. ambulance to navigate through the traffic jam. The access to RUH is already severely restricted and it is crucial to maintain patient safety in keeping these route clear and keeping traffic flow.

Officer response:

Whilst Kelston Road forms part of an important route serving the RUH, the introduction of a 20mph speed limit is not expected to have a significant adverse impact on overall traffic flow. Traffic conditions on this corridor are predominantly influenced by junction capacity, signal-controlled intersections, pedestrian activity, bus movements, parking activity and peak-hour congestion.

The proposal relates to a change in the speed limit only and does not introduce physical traffic-calming features such as speed humps, road narrowing's or chicanes. As a result, there would be no reduction in road capacity that would materially affect the throughput of vehicles using the route.

The Council recognises the importance of maintaining efficient access to and from the Royal United Hospital for ambulances and other emergency vehicles

Emergency service operators are statutory consultees for proposals of this nature and have been given the opportunity to comment on the proposal. The purpose of the scheme is not to impede emergency access but to improve safety for all road users, including vulnerable road users in the surrounding residential and school environments. Emergency vehicles responding under emergency conditions retain exemptions from speed limits where appropriate and subject to operational requirements.

The concern that queues may extend towards Combe Park has been noted. However, the proposed 20mph speed limit change alone would not generate traffic queues which could affect emergency vehicle access. Existing congestion in the area is primarily associated with peak-period demand, hospital-related traffic, bus movements and parking activity rather than the speed limit.

- I am writing to express my strong concern regarding the proposed reduction of the speed limit from 30mph to 20mph on Kelston Road/Newbridge Hill 26-027, Newbridge Road/Upper Bristol Road 26-028 and London Road West 26-029. I find it difficult to understand the justification for this change. The existing 30mph limit has been in place for many years and I do not believe reducing them to 20mph is necessary. These roads are key routes into and around Bath and reducing the speed limit is likely to increase congestion and lengthen journey times for residents, commuters and businesses.

I am also concerned about the impact this may have on drivers. I personally have experienced abuse from other road users for simply driving at the legal speed limit, even in 30mph zones. Reducing the limit to 20mph, may increase driver anxiety, as many motorists may feel pressured by impatient drivers when attempting to comply with the law.

I am also concerned about whether those making decisions on these proposals fully understand the day-to-day realities of using these roads. Residents and first

hand road users have first-hand experience of traffic conditions, congestion and the practical impacts of changes to speed limits. I hope that the views of local people who live, work and travel in Bath are being given significant weight in the decision making process.

Many residents and motorists already face increasing congestion and longer journey times. Lowering the speed limit further is likely to add to these frustrations while providing little practical benefit. It also raises concerns about whether the council resources could be better directed towards addressing road maintenance, potholes, parking issues and other local priorities that affect residents on a daily basis.

If the council believes these changes are necessary, I would appreciate seeing the evidence used to support the decision, including accident statistics, traffic studies, environmental assessments and any evaluation of the likely impact on local residents, businesses and traffic flow.

I urge the council to reconsider these proposals and to ensure that any changes to speed limits are based on clear evidence and genuine local need rather than a blanket policy approach. Given the importance of these roads as major transport routes into Bath, any changes should be carefully justified and subject to meaningful public consultation.

Thank you for taking the time to consider my comments. I look forward to your response.

Officer response:

The proposals have been developed under the Council's highway safety and active travel objectives and are being promoted under powers contained within the Road Traffic Regulation Act 1984. The primary purposes of the schemes are to improve road safety, reduce the likelihood and severity of collisions, improve conditions for pedestrians and cyclists, and enhance the amenity of residential areas.

Whilst 30mph limits have been in place for many years, this is not in itself evidence that it remains the most appropriate limit. Speed limits are periodically reviewed to ensure they remain consistent with current road environments, the nature of a road, travel patterns and national guidance.

The Council acknowledges concerns regarding journey times. However, it is considered that the impact of a 20mph speed limit on overall journey times would be limited because average traffic speeds in urban areas are frequently constrained by junctions, pedestrian crossings, traffic signals and congestion.

Traffic surveys carried out for the Newbridge Road / Upper Bristol Road proposal identified average vehicle speeds significantly below the existing 30mph limit. Recorded data showed an average speed of approximately 20mph, indicating that

many drivers are already travelling at speeds consistent with the proposed limit. Consequently, the impact on journey times is expected to be relatively small for motorists.

The Council's duty is not solely to facilitate the movement of traffic but also to secure its safe and convenient movement for all road users, including pedestrians and cyclists. The roads subject to these proposals pass through or adjacent to residential areas and serve locations used by vulnerable road users, including school children and parents accessing Oldfield School and Newbridge Primary School.

Research consistently demonstrates that lower vehicle speeds reduce both the likelihood of collisions and the severity of injuries when collisions occur. Even relatively small reductions in average traffic speed can produce measurable safety benefits.

The Council recognises concerns regarding driver behaviour and the possibility that some motorists may pressure others who are complying with the speed limit. Speed limits are established to provide a clear and legal standard for all road users. Compliance with the limit remains a matter for individual drivers. The possibility that some motorists may choose not to comply does not in itself justify retaining a higher limit.

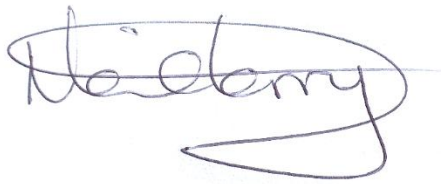
As part of the consultation process, Avon and Somerset Police were consulted. Their comments highlighted the importance of ensuring that speed limits are clearly signed and capable of achieving compliance without extensive enforcement.

Local knowledge and experience are an important part of the decision-making process, which is why the Council undertakes statutory consultation and invites comments from residents, businesses, road users, ward councillors, emergency services and other stakeholders. All representations received during the consultation period will be reviewed and reported before a decision is made regarding the proposed 20mph speed limits.

10. APPROVED FOR CIRCULATION TO WARD MEMBERS AND CABINET MEMBER FOR SUSTAINABLE TRANSPORT DELIVERY

Please note that this report has been circulated to provide you with an opportunity to consider any comments and/or objections which have been received in response to the public advertisement of the proposal(s), along with the officer response to each.

Any comments which you may have will be added to the report to be considered by the Director for Place Management, Chris Major, prior to his decision regarding the sealing, or otherwise, of this TRO.

A handwritten signature in purple ink, appearing to read "Neil Terry". The signature is enclosed within a large, loopy oval shape.

Neil Terry
Traffic Management and Network Manager

Date: 06/07/2026