

# OFFICER DECISION REPORT - TRAFFIC REGULATION ORDER (TRO)

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## APPROVAL TO PUBLICLY ADVERTISE THE TRO

PREPARED BY: Traffic Management Team, Highways and Traffic Group

<b>TITLE OF REPORT:</b>	<b>Lansdown Road</b>
<b>PROPOSAL:</b>	<b>20 M.P.H Speed Limit</b>
<b>SCHEME REF No:</b>	<b>26-026</b>
<b>REPORT AUTHOR:</b>	<b>Gina West</b>

### 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:

<b>Section A</b>	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....”
<b>Section B</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.
<b>Section D</b>	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 at Lansdown Road from the existing 20 mph speed limit at St Stephen's Church extending to its junction with Granville 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 Lansdown Road. 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.

## 9. **COMMENTS RECEIVED TO DATE**

**Chief Constable** - As stated in our email below, you may recall that the Traffic Management Unit responded to statutory consultation on behalf of the Chief Constable back in 2022 when there was a previous proposal to introduce a 20mph speed limit on Lansdown Road; at that time between Granville Road and what was then the existing 20mph at the Paragon junction, to which we lodged an objection on road safety and compliance grounds. Whilst not quite the same length, the previous proposal raised similar concerns. The current revision reinstates that original proposal and its associated concerns.

From the data provided at that time in 2022, the mean speed figures showed mean speeds which appeared broadly commensurate with the existing 30mph restriction but would not be commensurate for a 20mph without the introduction of traffic management measures.

The speed data at that time raised concern regarding the aspiration for a 20mph speed limit, particularly given the appearance of the road to a motorist, in terms of being a straight road, downhill, with wide verges, houses set back etc. The locations of both The Royal Bath High School and Kingswood School are set back from the carriageway and neither school presents a “traditional” school front. We had concerns regarding the possible introduction of a 20mph speed restriction regarding a potential lack of compliance, and the data appeared to support those concerns. There were no proposals at that time regarding measures to heighten motorist awareness of the prevailing speed restriction on the upper part of Lansdown Road as nothing was deemed suitable from an engineering perspective. It appeared that

simply reducing that speed restriction was unlikely to affect motorist behaviour long term, with this potentially raising road safety concerns in and of itself in terms of expectation v reality of traffic speed. Therefore, in 2022 an objection to that proposal was lodged on behalf of the Chief Constable.

A 20mph speed limit was subsequently introduced from St Stephens Church to The Paragon which was supported by the data available.

With regard to the current extended proposal for a 20mph speed limit on Lansdown Road, Bath from its junction with Granvile Road to the existing 20 mph speed limit at St Stephen's Church, as shown on the attached:-

The speed data provided, taken on Lansdown Road at a location adjacent to Northfields Close, below both school locations, shows an average speed of 27.0 mph. This is at a location where the road and environment around the carriageway begins to close in.

The additional speed data taken between Monday 11 May 2026 and Sunday 17 May 2026 at a location adjacent to the Hare and Hounds PH as shown on the attached plan, is showing a mean speed of 27mph both North and South bound (with a 7 day average of 28.6mph).

In line with our original response to the consultation, the speed data now provided across two locations on Lansdown Road is not commensurate with the 20mph speed limit being proposed and, given the other concerns which remain, the proposed 20mph speed limit will not currently receive support from the Traffic Management Unit responding on behalf of the Chief Constable.

As previously discussed, we have a Force stance regarding the introduction of speed limits, which has been written to reflect the current speed environment. I copy this below for your information.

“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.

The police service has to ensure all resources are used effectively in responding to community priorities. Avon and Somerset Constabulary will support all appropriate speed limits, including 20mph roads, where;

The limit looks and feels like the limit, giving visiting motorists who wish to conform that chance; 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;

The limit is self-enforcing (with reducing features) not requiring large scale enforcement;

The limit is only introduced where mean speeds are already close to the limit to be imposed, (24mph in a 20mph limit) 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.

Enforcement will be considered in all clearly posted limits, given other priorities, and this will be by:

Targeted enforcement where there is deliberate offending and the limits are clear; Where limits are not clear (that is they don't feel like or look like the limit or are on inappropriate roads), they will not be routinely enforced, only targeted where there is intelligence of obvious deliberate disregard which may result in increased threat, harm or risk to other road users.

Deliberate high harm offenders will always be targeted and prosecuted whereas enforcement against drivers who simply misread the road may not be appropriate. None of the above should in anyway leave the impression that we will not enforce the law. As with all speed limits, and other enforcement work, we will use evidence to ensure that our resources are allocated in the most appropriate way using appropriate tactics.

Enforcement of limits that do not comply with the above representations could lead to mistaken offending and could risk the loss of public support. Enforcement cannot and must not take the place of proper engineering and or clear signing."

We do not, as part of our response on behalf of the Chief Constable to formal consultation, check the accuracy or validity of what is being proposed but we do consider implications for road safety and enforcement.

It is not possible to dedicate an enforcement presence to such a restriction. The signage and any other physical measures to be introduced to enforce / heighten motorist awareness of the proposed scheme is therefore of importance. Any enforcement will be targeted, and intelligence led.

We always expect that:

- a) the powers being exercised are available to you as traffic authority, are valid and are appropriate for the proposals;
- b) the descriptions of the lengths of road, the road names, the road numbers and any directional descriptions are correct and accurate;
- c) where any proposals replace existing restrictions or prohibitions, that the previous orders are adequately revoked or varied;
- d) the mandatory traffic signs giving legal effect to the order will be fully TSRGD compliant, will give drivers adequate guidance and will be placed to accord to the descriptions in the order.

On behalf of the Chief Constable, we remain unable to support the proposed 20mph speed limit on Lansdown Road from the existing 20 mph speed limit at St Stephen's Church extending to its junction with Granville Road.

*Officer response:*

*Whilst the comments of the Chief Constable are acknowledged and understood, it is considered that public perception and acceptance of the anticipated benefits of 20mph speed limits has generally increased, and that 20mph speed limits should now be promoted on routes of this nature, despite having characteristics which may not lend themselves to a 20mph speed limit according to current guidance.*

*If the 20mph speed limit is publicly advertised and subsequently introduced, vehicle speeds could be monitored and, if necessary, the introduction of additional traffic management measures could be considered, subject to available funding and other approved priorities.*

**Emergency Services** – No comment.

**Road Haulage Association** – No comment.

**Freight Transport Association** – No comment.

**Parking Services** – No comment.

**Waste Services** – No comment.

**First Bus** – I read this in the SOR:

**c) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles.**

Comment: Lansdown Road is used by public service vehicles, but it's not considered that this proposal would unduly delay services or add additional running time.

We conducted a test at 20mph and can say that the journey time coming down the hill was around 12:30 minutes, this is an increase in the current time and may remove our ability to operate the P&R on the current timetable.

I'm struggling to understand how reducing the speed limit by 1/3 won't add on to the journey time? How does this fit in with the overall aim of reducing bus journey times across the WECA area?

## *Officer response*

*We have carefully considered the findings of your trial, including the reported journey time of approximately 12 minutes 30 seconds for the downhill section, and we appreciate the importance of maintaining efficient and reliable bus operations.*

*While it is acknowledged that reducing the posted speed limit from 30 mph to 20 mph represents a theoretical reduction of one third, this does not translate directly into a proportional increase in overall journey times. In practice, bus journey times are influenced by a range of operational factors beyond the posted speed limit, including junction delay, traffic conditions, passenger boarding activity, and signal control.*

*Evidence from comparable urban corridors indicates that buses rarely operate at the posted speed limit for sustained periods. On sections approaching urban areas or junctions, vehicles are typically already decelerating or interacting with other traffic. Consequently, the effective average speed is significantly lower than the theoretical maximum, meaning the marginal impact of a reduced speed limit on total journey time is generally limited.*

*We also note that the trial result appears to be based on an isolated run. Journey times can vary considerably depending on prevailing traffic conditions, time of day, and network performance. A single test does not necessarily reflect typical operating conditions or account for variability across multiple runs. A more representative assessment would consider a range of journeys across peak and off-peak periods.*

*Importantly, lower speed environments can contribute positively to journey time reliability, which is a key determinant of service quality. Reduced speeds can help to smooth traffic flow, reduce stop-start conditions, and minimise disruption caused by collisions or sudden braking. Improvements in reliability can reduce variability in journey times and support more efficient timetable operation, even where there may be a small increase in link-level running time.*

*With regard to the wider policy context, the West of England Combined Authority's objective to improve bus journey times is primarily delivered through targeted interventions such as bus priority measures, signal optimisation, and congestion management. The proposed 20 mph speed limit is intended to support broader objectives, including road safety, placemaking, and active travel, rather than to directly influence journey times. These aims are complementary, and improvements to bus performance are expected to be achieved through strategic network measures alongside local speed management.*

*It is also important to consider the proportionality of the impact. Any increase in journey time on a short section of route must be assessed in the context of the full route length, existing dwell times, and other sources of delay. In many cases, such impacts can be mitigated through minor timetable adjustments or operational refinements.*

**Stage Coach** – No comment.

**Ward Members**

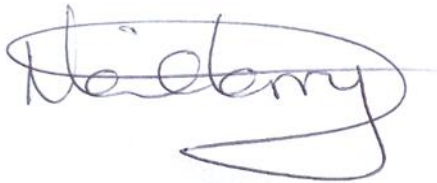
Councillor Mark Elliott – No comment.

**Cabinet Member for Sustainable Transport Delivery:**

Councillor Lucy Hodge – Many residents contact me about the speed of traffic on this stretch of Lansdown Road in the location of two senior schools and on a key route to other schools within the city. I support the extension of the 20 mph speed limit proposed.

**10. RECOMMENDATION**

It is my recommendation that the public advertisement of the Traffic Regulation Order should progress.

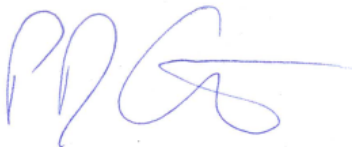


Neil Terry  
Traffic Management and Network Manager

Date: 12/06/2026

**11. DECISION**

As the officer holding the above delegation, I approve the progression of this Traffic Regulation Order.



Paul Garrod  
Head of Highways Delivery

Date: 12<sup>th</sup> July 2026