

OFFICER DECISION REPORT - TRAFFIC REGULATION ORDER (TRO)

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OUTCOME OF TRO PROCESS – OBJECTIONS RECEIVED

PREPARED BY: Traffic Management Team, Highways and Traffic Group

TITLE OF REPORT: London Road West

PROPOSAL: 20 M.P.H Speed Limit

SCHEME REF No: 26-029

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 at London Road West from the existing 20 mph speed limit near the junction of Gloucester Road extending in an easterly direction to the existing 20 mph at High Street, Batheaston.

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 London Road West. 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 objections received have been recorded below with an officer response to the various objections in italics underneath.

1 Support / 6 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 am writing to lodge a formal objection to the proposed Traffic Regulation Order 26-029 regarding the speed limit reductions on the A4 London Road West, specifically focusing on the section extending beyond the London Road West roundabout.

I object to this proposal based on the following safety, design, and traffic management grounds:

Failure of Road Geometry and "Psychological Speed":

The physical design of this specific stretch of the A4 is wide, open, and engineered to transition traffic out of the city. The road layout naturally creates a psychological speed expectation well above 20mph. Forcing an artificially low limit onto a road built like a strategic link corridor guarantees widespread, systematic non-compliance.

The Midford Precedent (Informed Local Evidence):

The council's rollout of 20mph limits in nearby Midford serves as clear evidence that ignoring road design fails to change behavior. In Midford, due to the natural flow of the road environment, the 20mph limit is overwhelmingly disregarded by the vast majority of motorists. Replicating this failure on a major link road like London Road West will breed similar cynicism, undermine the authority of 20mph limits where they are genuinely needed (such as around schools), and result in low compliance.

Absence of Localized Risk and Vulnerable Road Users:

National guidance under DfT Circular 01/2013 dictates that 20mph limits should target areas with high numbers of vulnerable road users. This section of London Road West has no nearby schools, no high-density pedestrian footfall, and the few residential properties present open directly onto a wide, segregated pavement, not the highway itself. Furthermore, the junctions along this stretch feature clear visibility corridors, even during adverse weather conditions like heavy fog.

Poor Allocation of Public Funds and Lack of Incident Data:

There is little to no historical incident or collision data justifying a safety intervention on this particular stretch of the road. At a time of constrained local authority

budgets, spending public funds on changing signage and forcing an unenforceable limit is a poor use of capital. Council funds would be far more effectively deployed on repairing existing road surfaces and improving structural highway infrastructure elsewhere in the city.

Because this stretch of road does not meet the basic criteria for a self-enforcing 20mph speed environment, I strongly urge the council to scrap this specific element of TRO 26-029 and retain the current, appropriate 30mph 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.

- I would like to object to the above proposal.

The council states:

"It is considered that reducing the existing 30mph speed limit to 20mph on London Road West would support a safer and more pedestrian-friendly street environment, particularly for vulnerable road users, local residents and cyclists."

However, the proposal provides no information on current free-flowing average speeds or 85th percentile speeds on this road, nor any data on current compliance levels. It also does not set out what reduction in *actual* vehicle speeds is expected, or whether any additional funding for enforcement is planned. This road was not included in previous schemes, presumably for a good reason, and if anything there should be a review of compliance levels on existing higher-standard roads to assess whether sign-only 20mph limits are appropriate on them. London Road is a major single-digit A-road which is straight with excellent forward visibility and lacking in parked cars; 20mph is not a natural speed along this section.

The statement of intent appears to assume that speed limits alone are a form of traffic calming. While there is some evidence that reducing limits to 20mph can improve safety on roads that *naturally* have such low speeds, limits are increasingly being applied to higher-standard or strategic roads where prevailing speeds are significantly higher. A posted speed limit is only effective if it is **self-explaining** and reinforces a driver's assessment of what is a safe speed to travel based on the surrounding environment.

In such cases, where speed limits are misappropriated as a broader form of traffic calming, widespread non-compliance often results. I have seen examples from higher-standard roads included in 20mph schemes showing non-compliance rates as high as 99.4%, with 97% reported on a road in Bristol and over 90% was measured on every main road that the local paper tested with a hidden radar detector.

Where limits are set well below prevailing speeds, this does not improve safety outcomes and helps to make speeding normal and socially acceptable. It may also give vulnerable road users, especially pedestrians, a false indication of *actual* traffic speeds.

An approach that optimises too heavily for a single variable such as absolute risk reduction can unintentionally undermine the wider functional objectives of the transport network, including compliance, network consistency, and efficient traffic flow.

Where compliance is so low, there is also a potential safety consideration: drivers attempting to adhere to the posted limit may travel significantly below the prevailing traffic flow, increasing speed differentials and potentially raising collision risk in mixed compliance conditions. This can place Highway Code guidance regarding appropriate progress (Rule 169) in tension with expectations of limit adherence.

This approach of trying to use limits as traffic calming by fiat also makes it increasingly difficult for enforcement to target the type of reckless driving behaviour that speed limits are intended to address, particularly where a small minority of drivers are those most likely to pose the greatest risk.

I therefore request that the decision be reconsidered, and that it be supported by published data on existing speeds, expected compliance, and the enforcement strategy intended to achieve the stated safety outcomes.

- As a resident and a daily user of this road, I strongly disagree implementing 20mph on this stretch. The road is already gridlocked after Gloucester Rd as the only main artery entering Bath from M4/A46. Putting 20mph restriction will slow traffic exiting Bath, causing traffic jams on London Road from Cleveland PI to Morrisons, which is already impossible for me to turn right into A46, or turn left into A4 towards RUH (where I work). The car spends more time idling causing emissions, and bus 3 struggles to get above 10mph with the traffic. There is no major point of interest for pedestrian west of St Saviours Road, and pavement is largely segregated, therefore it is sensible to leave it as 30mph.

I believe the council should help create traffic flow and get Bath traffic moving in attracting tourist and residents in getting to their workplace promptly and leave roads that just works alone.

- There is zero need for this.
- I have been commuting into Bath for 11 years. Before that, I lived in Larkhall and Lansdown. I commute along that road out of Bath at peak hours every day. I have seen no evidence to suggest that part of the road is unsafe to pedestrians or vulnerable road users and I would like to see some substantial evidence that you have to suggest that it is. Have you had cameras or councillors patrolling the area to look for evidence or is this just another ruse to get motorists out of Bath?

My feeling is that it would cause more back ups along the London Road (the existing 20mph areas have done nothing to ease that) and frustration would build leading to higher speeds entering the A46, making that part of the area much more dangerous.

If your grounds of making the area safer for pedestrians has gravitas then you could argue that all roads in the UK next to a pavement should be 20mph. Yes, we should have lower speeds outside schools. Yes, we should have lower speeds outside hospitals and care homes, but 30mph on a main road in/out of Bath is not dangerous. What is dangerous is testing again and again the patience of good drivers who are capable of driving safely at what is considered a normal speed limit for a main road.

I notice that Councillor Lucy Hodges is the only person to comment on the approval to publicly advertise. Why not wait for proper consultation with the Emergency and other services?

I wholeheartedly ask you to reconsider this proposal, taking into account the many users of that area and not just the few.

Officer response:

Several objections above state that London Road West is a wide, strategic A-road with good forward visibility and that its geometry does not naturally encourage speeds as low as 20mph.

The Council acknowledges that London Road West differs in character from some residential streets where 20mph limits have previously been introduced. However, the suitability of a speed limit is not determined solely by carriageway width or road classification. In accordance with the Road Traffic Regulation Act 1984, the Council must consider a range of factors including road safety, the needs of pedestrians and cyclists, residential amenity, and the character of the surrounding area when determining an appropriate speed limit.

The proposal has been developed on the basis that lower vehicle speeds can contribute to a safer and more attractive environment for vulnerable road users and support wider active travel objectives. The route forms part of the urban highway network rather than a rural or high-speed corridor, whilst also serving and accommodating residential frontages, bus stops, pedestrian movements and cycling activity.

Reference has been made to compliance levels on other 20mph roads, including Midford and other locations both within and outside Bath.

Whilst concerns regarding compliance are acknowledged, speed limits are only one component of the Council's wider approach to improving road safety and creating a safer highway environment. The Council recognises that driver compliance can vary between locations depending on road characteristics, traffic conditions and surrounding land uses. However, individual experiences at other sites cannot be assumed to accurately predict outcomes on London Road West if the 20mph speed limit is introduced. Each road or location is assessed on its own merits, having due regard to local conditions and the statutory duties placed upon the Council. The existence of non-compliance elsewhere does not in itself demonstrate that a speed limit is inappropriate or incapable of delivering benefits at this location.

Several respondents have questioned whether there is a collision history which justifies intervention and have requested supporting evidence.

A speed limit review is not dependent upon a location having a poor collision record. Highway authorities have a duty to consider measures that reduce the likelihood and severity of collisions before serious incidents occur, as well as promoting safer conditions for all road users.

The Council's objectives extend beyond casualty reduction alone and include:

- *improving safety for pedestrians and cyclists;*

- *supporting active travel;*
- *improving the amenity of residential and business areas;*
- *encouraging lower traffic speeds where appropriate; and*
- *creating a more pedestrian-friendly environment.*

The Council must consider these wider factors when proposals of this nature are being developed.

Some objections suggest that there are no schools, hospitals or significant pedestrian generators adjacent to this section of road.

The use of London Road West by pedestrians of all ages and ability, cyclists, those with mobility impairments, public transport users, residents, and commuters etc. all form part of the highway user group which the Council is required to consider.

Pedestrian activity occurs throughout the corridor, especially at bus stops, residential accesses and local crossings. The existence of footways does not remove the potential benefits associated with lower vehicle speeds, particularly in an urban environment.

Concerns have been raised that reducing the speed limit will worsen congestion, increase journey times, cause traffic to queue back towards the city centre, affect movements to the A46 and Royal United Hospital, and adversely impact bus services. The Council has considered these concerns alongside its duties under both the Road Traffic Regulation Act 1984 and the Traffic Management Act 2004. In promoting the proposal, the Council has concluded that the scheme is compatible with the safe and expeditious movement of traffic whilst balancing wider safety and environmental objectives.

Existing traffic conditions on London Road West are influenced by a variety of factors including:

- *signal-controlled junctions;*
- *peak-period traffic volumes;*
- *network constraints within Bath;*
- *bus operations;*
- *turning movements; and*
- *downstream congestion.*

Consequently, average vehicle speeds are frequently lower than the posted speed limit, particularly during busy periods.

While it is accepted that some journey time impacts may occur in certain circumstances, the Council does not consider that there would be a significant deterioration in network performance if the proposed 20mph speed limit was to be introduced. The proposal is also a speed limit change only and does not include physical traffic calming features that would reduce carriageway capacity.

It has been suggested that low compliance could create large speed differentials between compliant and non-compliant drivers.

The Council acknowledges this concern. However, all speed limits rely upon drivers complying with the legal requirements placed upon them. Similar concerns could be raised regarding any speed limit where some drivers choose not to comply.

The purpose of a speed limit is to establish a clear legal maximum speed and promote appropriate driver behaviour. The possibility that some motorists may exceed the limit does not in itself demonstrate that the limit is inappropriate.

Questions have been raised regarding enforcement and whether additional resources are proposed.

Avon and Somerset Police are statutory consultees for the Traffic Regulation Order process and have been consulted accordingly. The availability of continuous enforcement is not a prerequisite for introducing a speed limit, and highway authorities must take account of the road environment, signage, driver compliance and targeted enforcement activity.

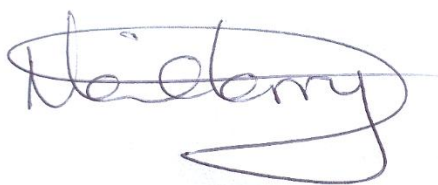
Several objections argue that funding would be better spent on pothole repairs, road maintenance or other infrastructure improvements.

The Council recognises the importance of maintaining the highway network. However, funding streams allocated to road safety and active travel initiatives are often distinct from those available for highway maintenance. The existence of maintenance requirements elsewhere does not preclude investment in road safety measures where these are considered to support the Council's transport objectives.

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 blue ink, appearing to read 'Neil Terry', with a stylized flourish at the end.

Neil Terry
Traffic Management and Network Manager

Date: 06/07/2026