

Sue Hill

From: jshawmsc@aol.com
Sent: 15 March 2011 17:33
To: Transportation
Subject: (Various Roads, Fox Hill Area, Combe Down, Bath) (20 M.P.H. Speed Limit) Order 201-PEV7211/TP
Attachments: PEV7211TP.pdf

Dear Sirs,

Please find attached my comments on the subject scheme.

Regards,

J. Shaw

Transportation Team
Floor 2, Riverside,
Temple Street,
Keynsham,
Bristol BS31 1LA

133 Queens Drive
Combe Down
Bath
BA2 5PE
14 March 2011

Dear Sir,

**(Various Roads, Fox Hill Area, Combe Down, Bath)
(20 M.P.H. Speed Limit) Order 201- Reference PEV7211/TP**

I would like to object to the above referenced scheme on the following grounds:

- This is an inappropriate use of public funds
- The order is invalid
- The purpose of the order is contrary to the principles of modern safety legislation
- The authority is not competent to plan and execute such schemes
- The scheme is discriminatory
- The scheme is contrary to the principles of the Equality Act 2010
- The scheme is unnecessary
- Such schemes do not work and they have an adverse impact on the environment

In addition I would like to propose an alternative scheme.

Objections:

1. Public Funds

The government is placing severe restrictions on public expenditure; schemes such as this wouldn't even be included on a priority list by most people. If there is an existing budget for this type of work then continuing to spend from it would represent mal-administration of the worst kind. Any such funds should remain unspent and be re-allocated by central government.

2. Invalid Order

There is no statement of the reason for this order available to the public, contrary to what has been stated in the order. There is no environmental impact statement available to the public. The order is incompetently framed; as stated there will be a section of Hawthorne Grove from the eastern edge of the junction with Sedgemoor Road to 12 metres beyond the eastern edge of the junction with Queens Drive not covered by this scheme, which surely cannot of been the intention.



Hawthorne Grove looking west from its junction with Queens Drive. Presumably the section of road from the 20mph signs in the distance to a point behind the photographer will be outside this scheme?

3. Modern Safety Legislation.

Since the formation of the Health and Safety Commission there has been a move away from prescriptive safety legislation; instead the onus for safety lies with the user. In the case of urban road networks it is for all road users to take responsibility for the safe use of the roads.

The local authority has a responsibility to provide a road that is safe to use, e.g. free of potholes, obstructions, clearly signed and well laid out. It is not for the local authority to prescribe how the road should be used. By placing a specific speed limit on a specific section of road, as opposed to a blanket urban limit, the authority is effectively stating that it considers 20 miles per hour to be a safe speed and has made itself complicit in any accident that might occur at or below that speed. Consequently it could, rightly, be open to prosecution by the Health and Safety Executive.

4. Incompetent Authority

Not only is the authority incompetent in framing the order, (See comment 1 above), but it has proved to be incompetent in carrying out similar schemes before. One has only to look at the adjacent scheme on Hawthorne Grove to see that this authority is incompetent to plan and execute such works.

The entrance into Hawthorne Grove is blind, with narrow pavements, minimal sight lines and a corner radius of less than 3 metres. By custom and practice householders park on both sides of Hawthorne Grove leaving effectively a single track road. It is unlikely that any road user could manage to drive into this road at a speed higher than 10 miles per hour yet the authority

has seen fit to impose a 20 mile per hour limit at this point. Added to that there is an adjacent raised road table that further increases the adverse gradient at this point. This makes entry and egress difficult in icy conditions and unnecessarily increases the risk that exiting vehicles will be unable to stop safely at the junction. The authority will no doubt be prosecuted if an accident happens at this junction.

The execution of this work was not trivial, it involved the installation of new drains as a result of the gutters being obstructed by the tables. The raised road tables were installed in advance of any warning signs or markings. When the signs were finally installed they were put up the wrong way round. The signs at the Entry Hill end are obscured by existing signs and are ineffective but add to the general ugly clutter in the area



Hawthorne Grove from Entry Hill, note the obscured 20mph sign in this adjacent, incompetently executed scheme. Note, as will most drivers, the poor sight lines, narrow pavements, narrow road and cars parked on both sides. Couple that with the less than 3m radius entrance curves and one has to wonder if a speed of over 10mph is actually obtainable. An unprofessionally executed scheme and a scandalous waste of public money.

5. Discrimination

One has to ask why Foxhill is the target of such prescription. Why does The Avenue, in Combe Down village and Lower Entry Hill receive, 'friendly', green advisory 20 mile per hour signs yet Foxhill estate has to have a mandatory scheme enforced with destructive road works?

Treat people like scum and they will behave like scum.

6. Equalities Act 2010

The Equality Act requires that disabled people be given access to goods and services. In line with this principle pavements at bus stops have been raised and 'kneeling' buses introduced. What is the point of this when the local authority places obstructions on the road surfaces? I suffer from damaged hip joints and the pain that I experience when the bus falls off a road table at even walking speed is severe. If the authority continues to increase the number of these shock generators around Foxhill estate and my condition worsens I will be forced, if I am still able, to walk off the estate to catch the bus. So much for providing access to the disabled.

7. Unnecessary

The proposed scheme is a solution looking for a problem. The Quantocks is a cul-de-sac with a narrow opening and short length. Porlock Road is a cul-de-sac with parking on both sides. Down Avenue is a narrow crescent with parking often on both sides and no through traffic. Sedgemoor Road is narrow and tends to have parked cars along its length. Effectively it is a single-track road for most of its length. It has insignificant through traffic flows. The major part of the scheme, Hawthorne Grove from Sedgemoor Road to Foxhill, has parking restrictions on the northern side, supporting the unidirectional flow of the number 13 bus service but nevertheless this flow is frequently interrupted by traffic in the other direction passing parked vehicles on the southern side.

The part of this road covered by the proposed scheme has property set back from the road, wide pavements by local standards and generally good sight lines. Traffic flows are lower than those in Entry Hill and The Avenue. Speeding is not a problem. Any hazards are self-evident to the vast majority of people and consequently they can be expected to behave appropriately. The introduction of an arbitrary speed limit will do little to change the behaviour of the many and nothing to curb the excesses of the few. The addition of destructive roads features distracts road users from the hazards they *should* be looking out for. Inappropriate behaviour should be prosecuted for what it is, as 'driving without due care and attention'. Driving at 20 miles per hour *can* be inappropriate too.

8. Ineffective Schemes and Adverse Environmental Impact

I am now in the unfortunate position of living near to one of the road tables installed as part of an earlier scheme in Queens Drive. Frequently I observe police vehicles and council vans and young mothers driving over this table at speed. No doubt no one in these categories has responsibility for the maintenance of their vehicles. There has been a significant increase in traffic noise as buses increase engine power to get over them, loads on lorries bounce and the meek and mild apply their brakes on the approach of another vehicle because they are scared to cross the table diagonally. And of course they then have to rev their engines to climb from a standstill over the hump. No doubt fuel consumption and air pollution has increased too.

One of these tables should be provided outside the house of every member of the Transportation Team and every councillor so that they may discover for themselves if they really do make Bath "an even better place to live, work and visit".



Making Bath an even better place to live, work and visit. Hawthorne Grove, part of the existing 20mph scheme, opposite Sydenham's yard. We *could* make it a better place to work and visit by assisting drivers get into the yard. Alternatively we can make no allowance for lorry cab overhang by introducing a line of bollards in camouflage black, well below a driver's sight line. The positioning of a shock generator outside a builders' supplies yard must have made this an even better place to live, work and visit.

An Alternative Proposal

As has already been stated above most of the roads covered by the proposed scheme do not carry through-traffic and are presumably have only been included to avoid the need to add a plethora of 20/30 mph signs at the junctions with Hawthorne Grove. Other than the simplification of signposting there is no reason for these roads to be included in the scheme.

At a guess, there being no publicly stated reason for this scheme, the authority presumably feels there is a need for some degree of 'traffic calming' on that part of Hawthorne Grove that forms part of the number 13 bus route.

A simpler way to achieve this effect, without any of the disadvantages given above, would be to change the priorities at the junction of Queens Drive with Hawthorne Grove. Eastbound traffic on Hawthorne Grove would be checked by the introduction of a 'Give Way' line and this would improve the egress of buses from Queens Drive.

Hawthorne Grove could be visually narrowed by marking parking bays on the north side and/or adding a hatched zone along the road centre line.



Hawthorne Grove looking west from its junction with Queens Drive. Priority should be changed in favour of traffic turning to and from the right into/from Queens Drive. Eastbound traffic on Hawthorne Grove would be checked by 'Give Way' line and egress for buses following the 'double-yellow line' route would be improved.

The opportunity should also be taken to change the priority at the other end of Queens Drive with its junction with Foxhill. At the moment the road layout is unsafe as the vast majority of the traffic flow is contrary to the priority markings and the priority route Foxhill southbound is blind to Queens Drive eastbound traffic.



Junction of Foxhill with Queens Drive looking north. Existing priority route is northbound into an un-signposted dead end. Southbound priority traffic exiting the dead end is concealed by the high bank in the centre of the view. The attention of drivers exiting Queens Drive is naturally drawn to the right as buses etc. take a wide arc in part because of the adverse camber/gradient at this junction.

Yours faithfully,

J. Shaw

J. Shaw, BSc, MSc, MIET, CEng