

## OFFICER COMMENTS IN RESPONSE TO OBJECTIONS RECEIVED

Following public advertisement of the Council's intention to extent a 20mph speed limit zone in the Foxhill area of Combe Down and to construct traffic calming features complementing the new zone, two objections were received by members of the public.

The grounds of objection received together with officer comments are listed below:

- **How will the traffic calming measures affect the large amount of traffic heading to the MOD site in Foxhill, using Hawthorn Grove as a rat run in rush hour traffic –**  
Officer comment: The traffic calming scheme along Hawthorn Grove incorporates a combination of road humps and speed cushions to complement a new 20mph speed limit along this road. Features of a vertical form, such as the ones proposed, are proven to be effective in reducing vehicle speeds and improving road safety. All new features are to a design tested and approved by the Department for Transport.
- **The noise level of vehicles slowing and accelerating –** Both objectors have concerns over increased noise levels due to acceleration deceleration of vehicles.  
Officer comment: Investigations carried out by the Department for Transport suggest that "where traffic flow consists predominantly of light vehicles, (as is the case in Hawthorn Grove) the effect of using road humps (whether flat top or speed cushions) should not result in an increase either in overall traffic noise or individual vehicle noise. However the right spacing between the devices will help ensure that noise variation does not create a nuisance. For speed cushions an ideal spacing for limiting the effects of noise variation has been found to be around 50 metres. No equivalent information is available for flat top humps but from experience it is suggested that spacings in excess of 100 metres are more likely to encourage drivers to accelerate between humps, thus increasing the likelihood of noise variations". The spacing between the features proposed along Hawthorn Grove varies from 40 to 50 metres.
- **Damage and devaluation to private property –** It is the objector's view that the proposed traffic calming scheme will cause damage and it will devalue his property. He has quoted government guidelines suggesting that no humps of any kind can be located within 25 metres from a bridge, subway or tunnel.  
Officer comment: Indeed, government guidelines advise that road humps must not be constructed on any bridge or other structure such as a subway, culvert, or inside a tunnel, or within 25 metres of such structure or tunnel. This is to ensure structure damage does not arise as a result of vehicle impact, or increased impact loading. The guidelines however do not make the same reference for citing road

humps adjacent to houses or other buildings. There is also no evidence to suggest that traffic calming decreases the value of private properties. In fact, experience from similar schemes elsewhere would suggest otherwise.

- **Inappropriate use of public funds** – The objector suggests that due to the current restrictions on public expenditure funding for this scheme should remain unspent and be re-allocated by central government.  
Officer comment: When the Council's budget for the current financial year was agreed, government budget savings were taken into consideration and it is for this reason that some schemes, that were originally included in the Council's draft Capital Programme of Works programme, were eventually omitted from it. The schemes that remained on the programme have government funds already committed to them and must be implemented during the current financial year. If not, that funding will be lost as it is not transferable to other services, and cannot be re-allocated by central government.
- **Invalid Order** – The objector states that there is no statement of reasons for this order available to the public and that the order is incompetently framed.  
Officer comment: A statement of reasons, together with associated drawings and a copy of the traffic order were available for public inspection during the advertising period. The traffic Order is correct and was compiled taking into consideration the limits of the traffic Order currently in place for the existing 20mph speed limit along Hawthorn Grove.
- **The Order is contrary to the principles of modern safety legislation** – The objector states that in urban road networks it is for all road users to take responsibility for the safe use of the roads. He also suggests that by placing a specific speed limit on a specific section of road the authority is 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.  
Officer comment: In an ideal world all road users would be taking responsibility for the safe use of the roads and there would be no accidents. The highway authority has a responsibility to provide a road that is safe to use. It also has a duty to reduce the number of accidents occurring on its road network. This is the reason this scheme is proposed. The speed limit is the absolute maximum and does not mean it is safe to drive at that speed irrespective of road and traffic conditions.
- **The Authority is not competent to plan and execute such schemes** – It is the objector's view that the authority has proved to be incompetent in carrying out similar schemes in the past.  
Officer comment: Every year the authority undertakes a large number of schemes within the area it covers, including traffic calming ones. All schemes are in line with government guidelines and legislation and are

subjected to safety audit reviews, undertaken by independent auditors, at different stages of the implementation process. Any issues that arise from that process are reviewed and resolved at a later stage.

- **The scheme is discriminatory** – The objector believes that because other areas in the vicinity had different types of traffic calming installed the Council discriminates against residents of the Foxhill estate, by proposing to implement a scheme with destructive road works.  
Officer comment: There is a large number, but also a limit, of traffic calming techniques that can be provided on public roads. Also, areas differ for one another and consequently have to be considered with their own individual characteristics/problems in mind. The proposed scheme in Foxhill has the strong support of local residents and Councillors. Consultation letters were sent to 434 households in the area and only two letters of objection were received. Combe Down Primary School has also registered its support towards the scheme.
- **The scheme is contrary to the principles of the Equality Act 2010** – The objector's view is that the traffic calming features proposed will be obstructing the passage of buses causing discomfort to passengers.  
Officer comment: The bus operators have been consulted and have raised no objections to these proposals.
- **The scheme is unnecessary** – The objector maintains that due to the existing traffic conditions and road layout the scheme is unnecessary and that the scheme will do little in changing the behaviour of the majority of drivers and nothing to curb the excesses of the few.  
Officer comment: Surveys undertaken previously by the Council show 85<sup>th</sup> percentile speeds of approximately 30mph. If no traffic calming is installed to support a 20mph speed limit signing on its own will not have any effect on vehicle speeds.