

**REPORT TO THE HEAD OF HIGHWAY MANAGEMENT
REPRESENTATION TO AN ADVERTISED TRAFFIC REGULATION ORDER**

**The Metropolitan Borough of Solihull (Various Roads – Balsall Common)
(20 MPH Maximum Speed Limit) Order 2024**

2nd September 2024

LEAD OFFICER: Jane Williams

1. Purpose of Report

- 1.1. To consider representations received to a permanent Traffic Regulation Order (TRO) to introduce a 20mph speed limit in Balsall Common.

2. Background

- 2.1 In July 2022, following a review of speed limits in the borough by Solihull Council, a new policy was introduced that set out how 20mph speed limits will be used and rolled out across the borough in the future. This policy focuses initially on prioritising those locations with high pedestrian movements including schools, retail and village centres.

In proposing such limits, the Authority is mindful of research undertaken for the Department for Transport in 2018 that concluded that whilst average speeds are unlikely to see significant changes following the introduction of a 20mph limit, they are likely to reduce higher top end speeds of faster drivers. Higher speeds come with a documented greater safety risk, particularly in terms of severity should a collision occur. As a result, any reduction in speed has a clear potential benefit to all road users and in particular vulnerable road users such as pedestrians. Improving road safety for vulnerable road users is a key target of the Councils Road Safety Strategy. The introduction of targeted 20mph speed limits therefore has the potential to positively contribute towards this target.

- 2.2 In reviewing the representations received to the proposals set out below, it is noted that a number query how and when the new restrictions will be enforced. Currently the police have sole responsibility for enforcing speed limits nationally and their ability to do so is frequently dictated by service demand and the level of resources available to them. As part of the Solihull Road Safety Partnership, the Council work alongside the Police and Fire and Rescue Service to conduct programmes of engineering, enforcement, and education all of which seek to improve road safety, part of which includes improving driver compliance with speed limits.

The new 20mph speed limits proposed are intended to be largely self-enforcing with the provision of gateway and repeater signs as appropriate to indicate the lower speed limit to motorists. The performance of reduced speed limits can take a number of years to establish as drivers adjust their behaviour to changes in speed limits. This is likely to be the case for the speed limits proposed here, however it is noted that in vehicle technological advancements such as active cruise control and geofencing are likely to play a vital role in the future in improving this. The impact of new speed limits will continue to be monitored, and the road safety performance reviewed as part of the Council's biannual study of collisions on the network. If through this process further mitigation is identified this will be fed into one of the Council's highway improvement programmes for consideration as appropriate.

The proposals as advertised are detailed on plan 9392 in Appendix A.

3. Matters for Consideration

- 3.1. The proposals were formally advertised on 16th February 2024 and the closing date for receipt of representations was 8th March 2024.
- 3.2. There were 97 comments received. Approximately 53% were supportive, 28% against and 19% neutral.
- 3.3. Set out on the following pages is a summary of the comments received to the proposals to introduce a 20mph speed limit in Balsall Common, along with an Officers response.

NB. It appears that during the consultation conducted by SMBC feedback was sought on additional

Comment	Officer response
Requests for engineering measures	
<p>20 representations included requests for engineering measures:</p> <ul style="list-style-type: none"> • improving existing speed humps • new traffic calming measures • a pedestrian crossing • a raised platform in coloured tarmac • Meeting House Lane becoming two cul-de-sac by blocking the road halfway • Segregated cycle lanes on the main road • Request for traffic calming on Holly Lane • White lines on B4101, passing places needed instead 	3.4

3.4 Engineering works such as traffic calming, pedestrian crossings, creating cul-de-sacs, creation of cycle lanes and passing places are outside of the scope of this scheme.

Comment	Officer response
Policing and Enforcement	
<p>9 comments referred to enforcement :</p> <ul style="list-style-type: none"> • Signage and enforcement being adequate to ensure a high level of compliance, how will this be enforcement. • Council and the police should focus on enforcing existing regulations. • I have never believed that a law (or in this case a speed limit) should be introduced if it cannot be enforced at least most of the time. • Every speed gun toting agent will arrive in the village to fill their complement of speed tickets. • The real issue is that numerous people do not keep to the 30 MPH and there is zero enforcement - they can do what they want with no consequences. • Do not enforce the proposed new 20mph in Balsall Common or anywhere in Solihull and surrounding areas. • Motorist can be fined for momentarily going at 21 or 23 in a 20. 	3.5 & 3.6

3.5 West Midlands Police currently have the responsibility of enforcing all speed limits. Whilst it is intended that the 20mph speed limit would be largely self-enforcing with the provision of signs to indicate the lower speed limit to motorists, it is noted that WM Police do have the capability to enforce and have recently undertook enforcement of 20mph speed limits in the region. Whilst the impact of 20mph limits can vary significantly due to specific site circumstances, reduced speed limits have also demonstrated positive changes to driver behaviour including reductions in driving speeds and importantly reduced top end speeds. This is particularly important as speed has a direct correlation to severity in a collision. Enhanced 20mph and school signage will be installed at the start and end of each new restriction to create a gateway feature and clearly inform motorists of the new speed limit.

3.6 Signing of the scheme will be in line with the statutory requirements.

Comment (number of comments in brackets)	Officer response
Requests for extension to the proposal	
<ul style="list-style-type: none"> • Extend the 20mph along the full length of Needlers End Lane (15) • Extend to the junction of Kemps Green Road (1) • Extend from the junction of Station Road and Balsall Street East to the roundabout in the centre of the village (2) • Extend to encompass all of Station Road (3) • Include Frog Lane (2) • It needs to be implemented on the section of a452 from the Co-op to the Heart of England school (1) • The whole of Station Road and the critical roads of Kemps Green Road and Stoneton Crescent used by parents taking children to BC primary school every day (1) • Extend to cover Kenilworth Road to its junction with Kelsey Lane. (1) • Extend on Kenilworth Road to Gypsy Lane (1) • Include full length of Blyth Avenue (1) • What considerations to speeding in rural areas (1) • Astbury Road (1) • Holly Lane (1) 	3.7

3.7 The suggestions for additional locations have been noted. Whilst such requests cannot be considered as part of this current proposal the roll out of a reduce speed limit may be considered in the future.

Comment (number of comments in brackets)	Officer response
The 20mph on Station Road extends too far from the village centre (3)	3.8
East side of the village seems to have been favoured against West side where the schools are (2)	3.9
Part time 20mph near to the school is adequate, part time 20mph could be extended (10)	3.10
Existing 30mph is adequate, it is almost impossible to attain more than 20mph between 7am – 7pm (2)	3.11
Impact on emergency services. Slower speed will hinder response times in critical situations affecting the ability of emergency vehicles to reach their destinations quickly. (1)	3.12
The blanket coverage that is being proposed cannot possibly mean all roads have received such concern, no requirement on cul-de-sacs (17)	3.13
Accidents are due to driver error, and this will not be improved by changing the speed limit, why will people who exceed the existing speed limit observe the 20mph speed limit (4)	3.14
There have been no accidents, no clear problems identified, how is it safer when a specific risk has not been identified? have any surveys been undertaken? (8)	3.14
Is there evidence that lowering the speed limit make the environs. Safer or is there greater risk of distracted drivers constantly checking their speed? Drivers MAY feel a false sense of security at lower speeds and take more risks than they would at higher speeds. (6)	3.14
Vehicles handle better and stop considerably faster than ever before. Technology in understanding crumple zones and other safety features such as ABS is better than ever. Due to modern car design, whereby safety must be assured, then accidents at speed considered higher than 30mph rarely bring about serious injury whereas 30-40 years ago that would not have been the case (1)	3.15
Drivers can't get out of 2nd and have to ride the clutch causing damage to the vehicles performance and causing stress to the driver before going back to a safe 30mph (2)	3.16
Encouraging drivers to buy conventional cars, driver training, Education campaigns for safer driving pedestrian training (5)	3.16
Affect public transport, deliveries, added congestion, cause disruption and delay, increased travel time (6)	3.17

Proliferation of street signs on every road is undesirable both for pavement safety and visual impact. Aesthetics of our community, What signage is needed and the cost, Are average speed cameras necessary on Kenilworth Road as there is already enough street furniture. (8)	3.18
Concerns about increased pollution (10)	3.19
General parking issues including footway parking (5)	3.20
Funds better spent on Potholes/Maintenance, Hedges need to be cut back on meeting House Lane, keeping vegetation cut back, and making verges walkable (8)	3.21
Kelsey Lane: make permanent, remove the 20mph speed limit, 20mph restriction is the most pointless in the world (7)	3.22
Holly Lane should be the focus (1)	3.23
There is no good reason for doing this which is an abuse of the council's power and misappropriation of funds, I am concerned about the financial implications of this proposal, Costs involved in changing what already exists, road marking, solar signs to indicate speeds, Cost benefit and perceived measurable benefits (5)	3.24

- 3.8 Station Road from the village centre east towards Hallmeadow Road is the main walking route to Berkswell Station. This extension was requested during the informal stages of the scheme by the Parish Council.
- 3.9 The main cause for concern is on the eastern side of the village with Meeting House Lane and the Malvern Road estate both being used for 'rat running' to avoid the traffic on the Kenilworth Road and the traffic signals at the junction of Kenilworth Road and Kelsey Lane. The western side of the village near to the school already has a part time 20mph speed limit in operation and the proposals seek to extend and upgrade this restriction to a full time 20mph.
- 3.10 The proposed upgrade to a full time 20mph speed limit from the existing part time 20mph speed limit recognises the vital role that schools play in the borough which often sees young people and vulnerable road users travelling to and from school outside of the traditional AM and PM drop off and pick up periods. Promoting a full time change to speed limits provides a consistent message for motorists and is line with Department for Transport advice regarding the use and roll out of reduced speed limits in our communities. It is acknowledged that at peak periods it is sometimes not possible to drive above 20mph on roads around schools.
- 3.11 It is acknowledged that at peak periods it is sometimes not possible to drive above 20mph on roads around Balsall Common. The introduction of a 20mph speed limit provides clear direction and support to motorists to travel at these speeds at such times and will reduce the potential for vehicles of significant different speeds to come into conflict in areas where there are high numbers of vulnerable road users and complex turning movements.
- 3.12 The Emergency services are consulted as part of every statutory consultation which is undertaken by SMBC. No objections have been received to these proposals.
- 3.13 Whilst short lengths of roads and cul-de-sac locations are unlikely to be subject to excessive vehicle speeds, for reasons of consistency and simplification/streamlining of signs they are included within the Order. The signing of a cul-de-sac would typically be two 300mm 'repeater' signs mounted back-to-back, if they were omitted larger 'terminal' signs would be required to advise motorists that they are leaving or entering the 20mph speed limit. This approach would result in both higher costs and additional clutter to the street scene.
- 3.14 In accordance with Department for Transport guidance, it is expected that the Council as the Local Highway Authority considers the introduction of more 20mph limits and zones. A study, conducted by Queen's University Belfast and the University of Edinburgh, states that "cutting speed limits on urban roads to 20mph does not significantly improve safety" then continues 'partly because drivers don't stick to the rules', we would respond that any improvement in safety however insignificant is positive and that it is non-compliance which the report is highlighting.
- 3.15 Whilst this may be the case for drivers it is not the case for pedestrians. The World Health Organisation states that the most effective way to improve pedestrian safety is to reduce the speed of vehicles. In 2022, police force figures indicated that 51% of collisions happened on 30mph roads.

By reducing the default speed, it will make it easier for drivers to stop in time to prevent collisions. According to the highway code, in the distance a 20mph car can stop, a 30mph car will still be doing 24mph.

Research shows a person is around five times more likely to be killed when hit by a vehicle travelling at around 30mph than they are from a vehicle travelling at around 20mph. The reduced speed limit should help achieve significant benefits in road safety.

- 3.16 It is the responsibility of the driver to drive in a responsible and appropriate manner and their choice if they feel they need 'to ride the clutch' and there is no evidence to state that driving in second gear damages a vehicle.
SMBC has no authority over type/size of vehicle which drivers purchase, and education/safer driving campaigns would need to be led by Central Government as this would have to be a countrywide initiative.
- 3.17 If vehicles travel at the same speed both congestion and air quality improve, and road safety risk reduces. The effect on public transport, deliveries and travel time is negligible.
- 3.18 Speed cameras will aid the police with enforcement of the speed limit and also aid compliance. Whilst the aesthetics of a place can, to some extent, be taken into consideration, this is not the main concern when dealing with road safety.
- 3.19 Air pollution is complex, some research suggests the health impacts are likely to be negligible and outweighed by the health benefits of slowed traffic. In addition, the increase in electric vehicles using our roads over the next few years is also likely to have positive impact on air quality.
- 3.20 Parking issues are outside the scope of this scheme.
- 3.21 Maintenance requests are outside of the scope of this scheme; however, all comments will be passed to the relevant team.
- 3.22 At present there is a temporary 20mph speed limit on Kelsey Lane, this is outside of the scope of this scheme.
- 3.23 The comment has been noted and passed to the relevant officer to investigate.
- 3.24 If the change will save lives and prevent people getting injured in road traffic collisions in the future, then the economic benefits will significantly outweigh the implementation cost which will be less than £10,000. The main cost of a fatal road traffic accident is that of someone's life, in monetary terms it is in excess of a million pounds.

Comment (number of comments in brackets)	Officer response
Support	
51 representations were received supporting the proposals with 21 of these referencing Meeting House Lane. Several requested an extension to the proposals with three requesting that the proposals on Station Road be reduced. Relevant comments to the proposals which were included within the supportive representations have been addressed fully in the above responses.	n/a

Ward Members' Views

The Ward Members for **Meriden** were informed of the proposals and subsequent representations.

Officer Recommendation

The representations received in respect of the proposed Traffic Regulation Order have been fully considered and responded to accordingly in section 3 of the report.

It is recommended that the proposed Traffic Regulation Order be implemented as modified on plan 9392-app B

Democratic Services

Democratic Services have confirmed that the proposed order was subject to statutory advertisement on the dates reported and that representations were received as noted above.

Risk Implications

The Corporate Risk Management Approach has been complied with to identify and assess the significant risks associated with this decision / project. This includes (but is not limited to) political, legislation and reputation risks.

The Approach is not intended to eliminate all risks and not all the risks identified can be managed all of the time. Also, risks will still exist that have not been identified.

For Decision

The Head of Highway Management is asked to approve that the Traffic Regulation Order as detailed on the modified plan 9392-appB in Appendix B is implemented.

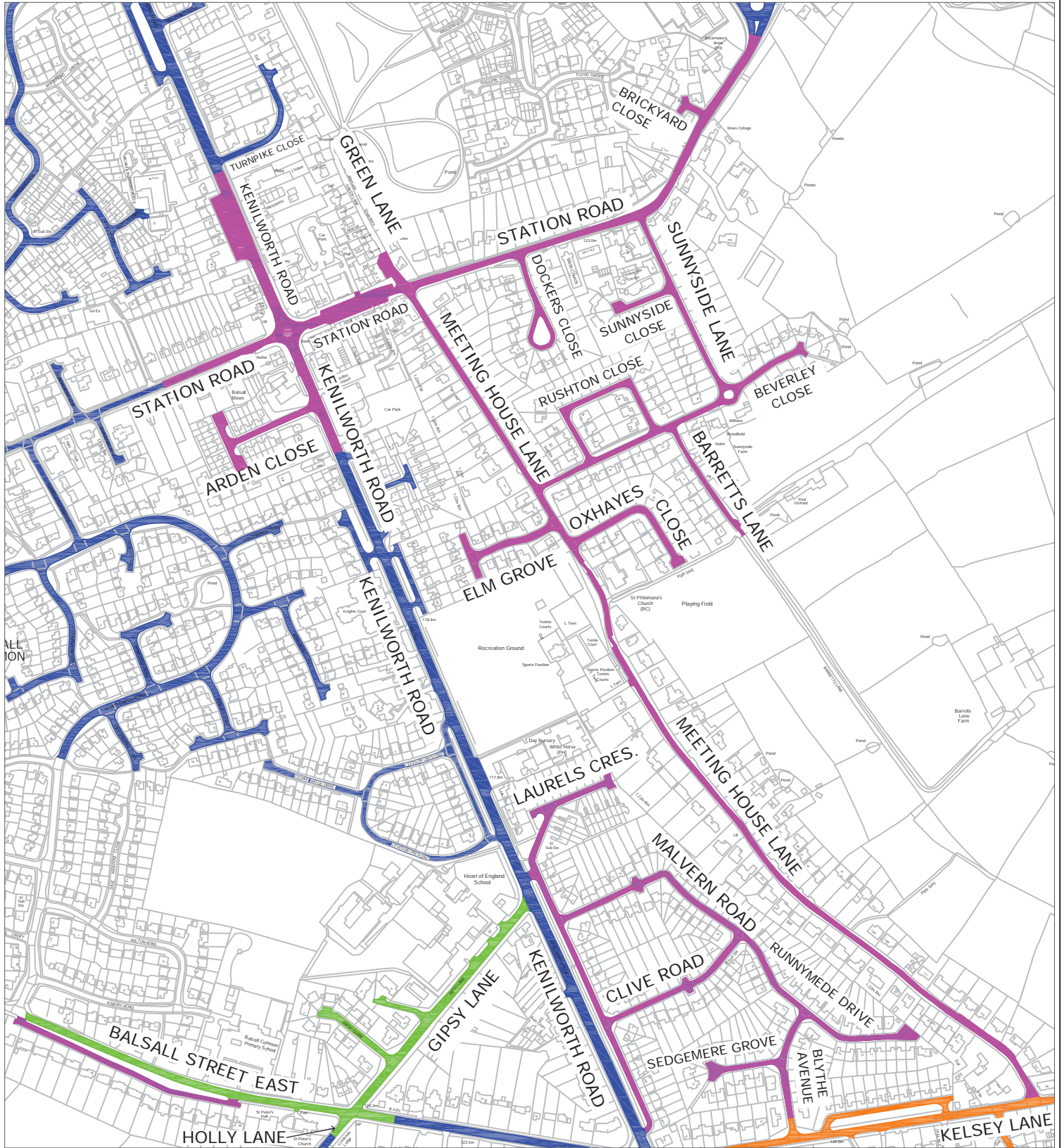
The recommendation as set out above is hereby approved:

Signature: ...P.S.Tovey.....Date: ...9th September 2024.....

**Paul Tovey
Head of Highway Management**

Key

- Proposed Full Time 20mph speed limit
- Existing 30mph/part time 20mph to become a full time 20mph speed limit
- Existing 30mph speed limit to remain
- Existing Temporary 20mph speed limit

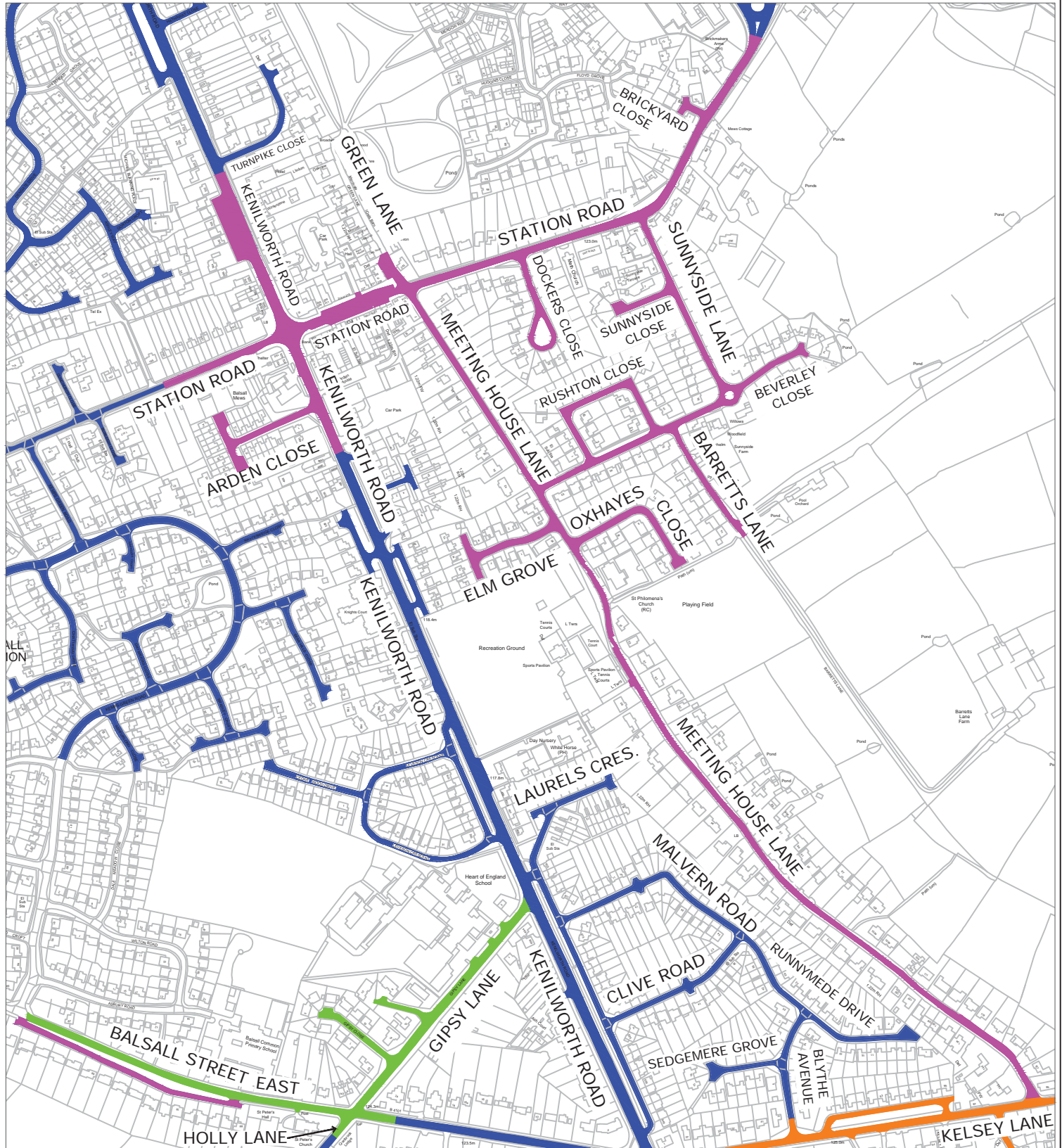


Notes.
 (A452) Kenilworth Road
 Balsall Common
 Proposed 20mph Speed Limit
 Appendix A

Job Name.	
Job No. 9392	Drawn By: JW
Plan No. 9392	Scale NTS
Checked By: PT	DO NOT SCALE A4 Frame
Date 28.12.23	OS Ref : .

Key

- Proposed Full Time 20mph speed limit
- Existing 30mph/part time 20mph to become full time 20mph
- Existing 30mph speed limit to remain
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Notes.
(A452) Kenilworth Road
Balsall Common
Appendix B

ECONOMY & INFRASTRUCTURE DIRECTORATE
 HIGHWAY SERVICES
 COUNCIL HOUSE
 SOLIHULL
 WEST MIDLANDS B91 3QB
 TEL: 0121 704 6000

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Job Name.	
Job No. 9392	Drawn By: JW
Plan No. 9392 - app B	Scale NTS
Checked By: PT	DO NOT SCALE A4 Frame
Date 04.09.24	OS Ref : .