

CABINET MEMBER DECISION MEETING FOR TRANSPORT, WASTE AND INFRASTRUCTURE SERVICES

11TH AUGUST 2023

Cabinet Member:	Portfolio
Cllr. Edward Thomas	Cabinet Member for Transport, Waste and Infrastructure Services

TRAFFIC REGULATION ORDER FOR 30MPH SPEED LIMIT

Purpose:

To consider Objections received to the advertised Public Notice and draft Order and determine whether the Traffic Regulation Order should be made.

Recommendation:

1. It is recommended that Objection Nos. 2, 3, 4, 5, 6, 7, 8, 9 and 10 be upheld and the proposals for the 30mph speed limit at the locations in question be withdrawn.
2. It is recommended that Objection Nos. 1, 11 and 12 are noted and that the 30mph Order be made.

Reasons:

To support the forthcoming Welsh Government legislative change introducing 20mph speed limits on restricted roads through 'The Restricted Roads (20 mph Speed Limit) (Wales) Order 2022' which will come into force on the 17th September 2023.

The proposed 30mph limits on certain roads will facilitate the movement of traffic whilst also providing consistency for local communities and road users.

Name of Head of Service: Steve Pilliner	Head of Service: Highways & Transportation	E-mail sgpilliner@carmarthenshire.gov.uk
Report Author: Mike Jacob	Traffic & Road Safety Manager	E-mail mjacob@carmarthenshire.gov.uk

Declaration of Personal Interest (if any):

Dispensation Granted to Make Decision (if any):

DECISION MADE:

Signed:

DATE: _____

CABINET MEMBER

The following section will be completed by the Democratic Services Officer in attendance at the meeting

Recommendation of Officer adopted	YES / NO
Recommendation of the Officer was adopted subject to the amendment(s) and reason(s) specified:	
Reason(s) why the Officer's recommendation was not adopted:	

EXECUTIVE SUMMARY

CABINET MEMBER DECISION MEETING FOR TRANSPORT, WASTE AND INFRASTRUCTURE SERVICES

11TH AUGUST 2023

TRAFFIC REGULATION ORDER FOR 30MPH SPEED LIMIT.

Brief Summary of Purpose of Report

The purpose of this report is to consider the objections received in response to the following draft Traffic Regulation Order which was advertised for comment and objection:

- ***THE COUNTY OF CARMARTHENSHIRE (IMPOSITION OF 30 M.P.H. SPEED LIMIT) ORDER 2023***

The purpose of the proposed Order is to introduce 30mph speed limits to address the following situations:

1. As exceptions to the Welsh Government's 'The Restricted Roads (20 mph Speed Limit) (Wales) Order 2022'.
2. As supporting 'buffer' limits on the approaches to 20mph speed limits.
3. Non-Restricted Roads where a 30mph limit would reflect road use and surrounding development.

Copies of the advertised Public Notice pertaining to the draft Traffic Regulation Order is presented as Appendix 1.

Plans showing the objector locations are presented as Appendix 2.

An outline of the objections received is presented and discussed below. A full copy of the objections will be available separately at the meeting for detailed consideration.

Discussion of Objections

During the statutory consultation period the Council's Head of Administration and Law received representations from twelve objectors. These are discussed below with the removal of personal details.

Summary of objection	Discussion
<p>Objection 1 As the operator of a tourism business, the objector feels that the speed limits will have a negative effect on people visiting Carmarthenshire and have a significant detrimental effect on the tourism sector within Carmarthenshire and Wales.</p> <p>The objector states that the Welsh Governments own research shows that the imposition of these speed limits would cost the Welsh Economy £4.5 billion, and there is very little evidence to show limits will increase road safety or reduce pollution therefore I cannot understand why the authority are going ahead with their imposition.</p> <p>The objector states that the cost to the taxpayer to implement these changes across Wales is over £32.5 million and cannot be justified. We are continually informed 'there is no money, and we need to make savings', yet the authorities have decided to go ahead with spending massive amounts of public money on a scheme that the majority of the public do not want. The whole scheme makes no sense and should be stopped before it is too late.</p>	<p>Objection 2 The Objectors views on the impact of changing national legislation on Tourism are noted.</p> <p>The national change in legislation is being introduced by the Welsh Government and each Local Authority is obliged to implement the change on its highway network.</p> <p>The national change in legislation is a decision which has been taken by Welsh Government and will apply to restricted roads across Wales. The implementation of the change is being funded by Welsh Government.</p>
<p>Objection 2 Objection to the 20mph restriction being imposed on Llanedi road with a transition to 30mph halfway along the road.</p> <p>There is no defined justification for changing the speed limit from 20mph to 30mph so please extend the 20mph limit to beyond all houses on Llanedi Road, Fforest.</p> <p>The objector states there is no footpath on the way to Llanedi, and an incident occurred where a dog was killed by a speeding motorist. Leaving the speed limit at 30mph will certainly not encourage people to walk, and without changes being made the aspiration of the Welsh government will not be achieved, namely:</p>	<p>Objection 2 Having considered the additional evidence provided by the local community and reviewed this with respect to Welsh Government's Guidance regarding Place Criteria it is recommended that the proposal to introduce the 30mph be withdrawn. The section of highway would then default to 20mph in accordance with Welsh Government's changing legislation.</p>

<ul style="list-style-type: none"> • Reducing the number of collisions and reducing the number of severe injuries (and also reduce the impact on the NHS to treat the people who are injured) • It will encourage more people to walk and cycle in our communities • Helping to improve our health and wellbeing • Making our streets safer; and • Safeguarding the environment for future generations. 	
<p>Objection 3 The objector wishes to see the proposed 30mph removed and the 20mph extended to the last house along Llanedi Road, Forest. After the last house there is a public footpath which is used by people walking and dog walkers. This is a highly dangerous piece of road as there are no pavements from No.8, Cysgod Y Deri to the footpath. When returning from the footpath and as per the highway code you walk on the side with the approaching traffic, you take your life in your hands as you are walking into traffic which is speeding as they know they are leaving the village onto a road that is changing to 60mph. There has been a child killed and a person's dog hit and killed because they could not get the dog into the side quick enough. The Objector totally opposes this change until either the 20mph is extended past the last house and footpath or a pavement is put in to try and save lives. Going from 20mph to 30mph and then 60mph in such a short area of road is not acceptable.</p>	<p>Objection 3 As discussion of Objection 2</p>
<p>Objection 4 The objector is a resident of Llanedi Road, Fforest. They have two main concerns about the proposed speed limit increase. First, B4297 has a number of blind corners. These corners make it difficult for drivers to see oncoming traffic, and they are a particular danger to pedestrians and cyclists. Second, B4297 does not have a pavement for pedestrians. This means that pedestrians are forced to walk on the road, which is dangerous and puts them at risk of being hit by a car.</p>	<p>Objection 4 As discussion of Objection 2</p>

<p>They urge the County Council to reconsider the proposed speed limit given the blind corners and lack of pavement for pedestrians.</p>	
<p>Objection 5 Petition signed by 54 people who use the B4297 road daily and are involved with Llanedi School. They ask the County Council to reconsider the situation and impose a 20mph along the current 30mph. They consider the speed of the traffic to be horrendous and life threatening for pedestrians - and from the direction of Tycroes there is no pavement, the road narrows and those who walk to and from school every day face unacceptable challenges such as verbal threats and obscene gestures. In addition, they consider there is a danger to other motorists driving on the road in question.</p>	<p>Objection 5 Having considered the additional evidence provided by the local community and reassessed against the Welsh Government's Place Criteria it is recommended that the proposal to introduce the 30mph be withdrawn. The section of highway would then default to 20mph in accordance with Welsh Government's changing legislation.</p>
<p>Objection 6 Objector states there is an inherent problem of excess speed of vehicles on the B4297 through the village of Llanedi, verified by the two 'speed warning' signs in place on the entrance to the village and approach to the school. The objector has kept observations using the speed warning signs within the village and the average speed of vehicles through the village during observations was 40.35mph, the fastest observed was 47 mph during school hours. The objector is a local resident and feel that they have a duty of care to point out that a temporary speed limit around the school should be made a permanent 20mph.</p>	<p>Objection 6 As discussion of Objection 5</p>
<p>Objection 7 The proposed 30mph limit is on a sharp, blind bend and the existing 30mph limit has proved, historically to be inadequate to slow up traffic causing near misses to vehicles and pedestrians.</p>	<p>Objection 7 As discussion of Objection 5</p>

<p>The pedestrian walkways between Ebeneser Chapel and Llanedi Primary School are totally inadequate resulting in abuse to pedestrians from drivers of vehicles when accompanying children to school.</p> <p>This also applies to pedestrians and visitors to two holiday cottages on Ebeneser Road. Visitors to local properties including couriers, Royal Mail employees and employees of Carmarthenshire County Council (Recycle Bag Collectors) who park their vehicles opposite and have to cross the road with utmost care as they have no visible sight of oncoming traffic from the Tycroes direction when returning to their vehicles. This also applies to us as residents of Penygraig who wish to access their parked vehicles. Casual parking on the dwelling side is not a safe option.</p> <p>The B4297 is a popular route for individual cyclists and members of cycling clubs who when travelling along Ebeneser Road are not visible to traffic negotiating the bend from both directions. This again is a road safety issue. The location has a notorious record of frequent accidents ranging from head-on collisions with telegraph poles to vehicles mounting hedgerows.</p> <p>The imposition of a 20mph speed limit would make a positive contribution to a safe route to school for children living in the northern end of the village of Llanedi.</p>	
<p>Objection 8 B4297 Llanedi Objector states that the 20mph outside Llanedi school should be a permanent speed limit not temporary. A 20mph should be extended towards Tycroes passing the bend outside the property known as Penygraig and not 30mph. Access to the property is on the bend.</p>	<p>Objection 8 As discussion of Objection 5</p>
<p>Objection 9 The objector states that this part of the B4333 road at Hermon is used very heavily by pedestrians, including children and dog walkers and ask that the County Council to reconsider the plan for the 30mph.</p>	<p>Objection 9 Having considered the additional evidence provided by the local community and reassessed against the Welsh Government's Place Criteria it is recommended that the proposal to introduce the 30mph be withdrawn.</p>

<p>They state there have been two quite serious accidents in this part of the road recently and was necessary to get the Police to the sites and the Ambulance Service.</p> <p>They state that both accidents involved cars crossing over the pavement with one hitting the bank on the left and the other hitting a wall on the left.</p>	<p>The section of highway would then default to 20mph in accordance with Welsh Government's changing legislation.</p>
<p>Objection 10</p> <p>The Objector would like to explain that the lower section of the B4333 which is to remain at 30 mph is extremely dangerous, there is a sudden deceptive bend and rise in land (Knwc Penffin) in the road before coming down to Tegfryn bend.</p> <p>There is a Go Safe van and new police vehicles constantly waiting in the car park and therefore able to see this stretch of road and catch many who are speeding.</p> <p>There have been accidents due to this stretch of 30mph and they have enclosed photos of the latest one where the Police, Fire Brigade and Air Ambulance Helicopter were present.</p>	<p>Objection 10</p> <p>As discussion of Objection 9</p>
<p>Objection 11</p> <p>The objector believes that the B4304 (Dyffryn Road, Bynea) should be 40mph, not 30mph, like the rest of the Coastal Road, especially now the Llwyn Hall junction is no through road.</p> <p>The Objector believes that the A484 Loughor Bridge should be 40mph and not 30mph.</p>	<p>Objection 11</p> <p>The two locations mentioned by the objector already have a speed limit of 30mph and therefore the proposals are like for like.</p> <p>The B4304 was constructed using a design speed that necessitated a 30mph speed limit and therefore the Speed Limit cannot be increased on safety grounds.</p> <p>The speed limit across the A484 Loughor Bridge is currently 30mph and is considered appropriate as the road is bounded by footways on both sides and is well used by both pedestrians and cyclists.</p> <p>It is recommended that the objection be noted but to proceed with the proposal.</p>
<p>Objection 12</p> <p>Objection to the lowering of the existing 40mph to 30mph on the A485 at Peniel (south).</p> <p>The objector states that they live alongside the A485 which has been subject to a 40mph speed limit for the whole of their occupation from 1991 to the current day.</p>	<p>Objection 12</p> <p>The A485 through the centre of the village as a Restricted Road and will default from the current 30mph limit to 20mph in accordance with Welsh Government legislation.</p>

The objector states that research shows that internal combustion engines are at their most efficient, and emit less pollution, at speeds between 50 and 60 mph. The existing 40mph limit is already suboptimal and a further reduction is likely to greatly increase the emissions from vehicles travelling north on the road against the gradient.

No survey of existing air quality adjacent to the road has been made and there has been no evaluation of the possible negative effects of the proposed reduction in speed limits. They believe that the County Council are in breach of Welsh Government advice on monitoring air quality in residential areas. The arbitrary imposition of a lower speed limit has a disproportionate effect on those living on rural areas. Lower speed limits, not required for road safety reasons, add time to journeys whether for work, education, health, or recreation. These diminish the quality of life of those so affected and should only be made where there is overriding reason. I believe the Council has failed to consider these negative effects prior to imposing this limit.

Residents living next to a main road are at risk from excessive speed by vehicles using the road. Mitigation of this risk by the use of speed limits is of little effect if they are not enforced. 30 years ago, the whole of the A485 in Peniel was limited to 40mph and there was regular enforcement of the limit by the police. Since the central area was reduced to 30mph the police enforcement has stopped and speeding vehicles continue to pass through unheeded. The arbitrary imposition of this lower speed limit will have no positive effect if it is not enforced. The Councils proposal does not have plans for enforcement.

The approaching sections of the A485 are currently subject to a 40mph limit and would not change with the legislation.

Lowering the speed limit to 30mph either side of the central 20mph limited area will reflect the surrounding environment, support the integrity of the 20mph section whilst still recognising the strategic nature of the A485.

Welsh Government advice states that:

A study by Imperial College found that 20mph limited areas were "pollution neutral". Many things contribute to pollution levels. They include:

- *driving style,*
- *acceleration,*
- *braking,*
- *vehicle condition*
- *distance travelled and*
- *engine temperature.*

We believe the lower speed limits will encourage more people to choose active ways to travel and there will be fewer polluting cars on the roads.

[Introducing 20mph speed limits: frequently asked questions | GOV.WALES](#)

The approximate additional journey time associated with lowering the speed limit on this section of road is estimated to be marginally less than 10seconds.

Lowering of the speed limit will improve road safety. If a pedestrian is struck by a vehicle the risk of death is approximately four times higher at 40mph than at 30mph.

Both the Police and GoSafe have indicated that will continue to enforce speed limits where needed, their approach will be on a risk-based system.

It is recommended that the objection be noted but to proceed with the proposal.

Summary Table

Objection	Location	Recommendation
Objection 1	General objection to lowering speed limits	Be noted
Objections 2, 3 and 4	B4297 Llanedi Road, Fforest	Be upheld and the proposal withdrawn
Objections 5, 6, 7 and 8	B4297 Llanedi (by primary school)	Be upheld and the proposal withdrawn
Objections 9 and 10	B4333 Hermon	Be upheld and the proposal withdrawn
Objection 11	B4304 Bynea & A484 Loughor Bridge	Be noted but the Order made
Objection 12	A485 Peniel	Be noted but the Order made

Recommendation:

1. It is recommended that Objection Nos. 2, 3, 4, 5, 6, 7, 8, 9 and 10 be upheld and the proposals for the 30mph speed limit at the locations in question be withdrawn.
2. It is recommended that Objection Nos. 1, 11 and 12 are noted and that the 30mph Order be made.

DETAILED REPORT ATTACHED ?

NO

IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed: **S.G. Pilliner**

Head of Transportation and Highways

Policy and Crime & Disorder	Legal	Finance	ICT	Risk Management Issues	Organisational Development	Physical Assets
NONE	YES	YES	NONE	NONE	NONE	NONE

Legal

The Traffic Regulation Order would be introduced by the Council's Head of Administration and Law.

Finance

The cost of the Traffic Regulation Order is funded from the Welsh Government 20mph Capital Grant.

CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below.

Signed: **S.G. Pilliner**

Head of Transportation and Highways

1. Scrutiny Committee – N/A

2. Local Member(s) - All Local Members consulted as part of the Traffic Regulation Order process, with two objections being received.

3. Community / Town Council – All Town, Rural and Community Councils consulted as part of the Traffic Regulation Order process with no objections received, one from Cllr Tina Higgins and one from Cllr. Bryan Davies

4. Relevant Partners - key stakeholder, to include the Police, GoSafe, Ambulance Service, Fire Service, Freight and Haulage Groups, Bus Operators, Access Groups, consulted as part of the Traffic Order process, no objections received.

5. Staff Side Representatives and other Organisations - N/A

Section 100D Local Government Act, 1972 – Access to Information

List of Background Papers used in the preparation of this report:

There are none.