

## **THE CASE FOR A RURAL SPEED ZONE ACROSS BREINTON PARISH**

### Introduction

Breinton Parish Council requests that the Highways Authority (Herefordshire Council) establish a rural speed zone in the parish. All of our public highways currently have a 60mph speed limit – the national standard – other than the A438 (Kings Acre Road) which is restricted to 40mph. We want a 40mph speed restriction throughout the parish. In our view an even lower limit might be desirable but we do not believe that this is possible.

We understand that Department for Transport (DfT) circular 1/2013 introduced the concept of rural 40mph zones with simplified signage requirements etc. The Parish Council believes that Breinton would meet any criteria for such a zone and that this would bring significant benefits to the area's residents, walkers, cyclists and horse riders, visitors to the parish as well as the more general travelling public – not least to their activity levels, wellbeing and health.

### Our Aim

We are seeking to have the current maximum speed limit within the parish reduced to 40mph through revisions to Traffic Regulation Orders and a minimally engineered solution. This could involve boundary signs to the zone and the minimal use of repeater signs, preferably on the carriageway surfaces. While accepting that these markings can sometimes be obscured we are keen to minimise signage in verges and hedge growth already obscures the existing signs on occasions. In addition we feel that less intrusive signing is really more appropriate in this area of natural beauty where sign clutter would be an issue.

We are prepared to contribute to any costs involved.

### National Regulatory and Policy background

As far as the Highways Authority is concerned we understand that DfT circular 1/2013 relaxed the signage requirements for road speeds particularly in relation to the frequency and visibility of repeater signs. More recent regulation is contained within the Traffic Signs Regulations and General Directions 2016 and the relevant specifications are contained in the Traffic Signs Manual which was updated in March this year. The Parish Council has contacted the DfT for further information and guidance. They told us that they have approved a number of rural speed zones but that since the 2016 regulations, traffic authorities have been able to put in such signage without needing to seek Ministry permission. They no longer keep records of where these zones are installed or how many now exist.

More recently, in May 2018 the consultancy SYSTRA completed its road safety management capacity review for the DfT. The department had committed to commissioning this work in the 2105 Road Safety Statement.

This independent report is not a statement of government policy but will inform the next plan for road safety. However the department has said that 'it is aware of the concerns about speed on rural roads' which would be a focus of the reforms. The Parliamentary Advisory Committee for Transport Safety (PACTS) has also welcomed and supported the report's conclusions. One of the four key conclusions was that Ministers should cut the 60mph speed limit on rural roads with particular emphasis on single carriageways.

However a rural speed zone does not need to wait for the next national plan for road safety. It is possible now. Breinton could be a pilot for this approach to be rolled out across the County if thought suitable

#### Local Planning Policy background

In 2016 Breinton's Neighbourhood Development Plan (NDP) was approved and now forms an important part of the Local Planning Framework. Neighbourhood Development Plans cannot include policies on traffic or transport. However within the context of land use planning NDP objective 7 and policy B13 are extremely relevant.

- The objective is for Breinton 'To continue as an area free of chemical, airborne, noise or light pollution on the boundary of Hereford City: providing recreational opportunities including walking, running, cycling and riding in exceptional countryside.
- Policy B13 concerns countryside recreation saying 'To ensure Breinton continues to act as an important area for informal, outdoor countryside recreation and tourism, development appropriate to a tranquil rural area including the following will be encouraged (1) new and improved access points and recreational routes (2) appropriate signage.

The proposed rural speed zone is thus totally in accord with the land use policies of Herefordshire's Local Plan.

The 2018 public consultation for the Hereford Transport Package confirmed that improving pedestrian and cycling routes were a public priority and included further speed restrictions and new green corridors for walking and cycling within a long list of improvements to be considered. The proposed rural speed zone is completely in line with this thinking. Breinton is already one such a green corridor.

Earlier this year Breinton Parish Council provided a comprehensive response to the Hereford Transport Package (HTP) – walking, cycling, bus and public space consultation. We noted that the Package's objectives included:- creating attractive alternatives to shorter car

journeys, encouraging healthier lifestyles, improving air quality and reducing noise as well as improving safety for all road users.

Although Breinton is not formally within the Package's area it would be significantly impacted by the HTP's proposals because of the proposed western bypass. We believe that the rural speed zone we are proposing meets all of the HTP's policy objectives listed in the previous paragraph. Indeed should the proposed bypass ever be built we consider that speed restrictions within the parish will be absolutely necessary as a result of the changes in travel patterns the new road would cause. For instance increased delays along the Kings Acre Road would add to the potential for Breinton's unrestricted lanes to become significantly more popular 'rat runs' than they already are. There is anecdotal evidence in the last couple of years that our roads are increasingly being used as cut-throughs.

As part of the HTP proposals various maps gave overviews of the proposed improvements for using vague orange arrows to indicate 'opportunities for new walking, cycling or horse riding connections' from the proposed new bypass to the countryside to the west of the city including into Breinton. ([Appendix 1](#)) While we are not sanguine about the state of the transport infrastructure in the parish we do not believe many, if any, new physical measures are needed. The basic network of lanes, bridleways and footpaths already exists and is in good order. It is used and enjoyed by sizeable numbers of people on a daily basis and throughout the year.

We have always been concerned about the potential for urban/suburban solutions being imposed on our rural area. The rural speed zone we are proposing could be all that is necessary to increase active travel in the area and encourage even more city residents and tourists to visit the attractive countryside on the edge of Hereford. We strongly support Active Travel Measures across the city and its rural hinterland and believe that a rural speed zone in Breinton is one practical and low cost measure that could be implemented quickly and easily. Cycling has the active support of the city's MP – Jesse Norman

#### Geographical extent of the zone

Breinton is ready made for the introduction of a rural speed zone, please see [Appendix 2](#). In our opinion the existing highways require very few additional works to bring this about. The parish is a self-contained area of C and Unclassified roads just west of Hereford bounded by the River Wye in the South, the A438 in the North and Hereford City to the East. Breinton Parish Council requests the Highways Authority (Herefordshire Council) to establish a rural speed zone covering the C class and unclassified roads within the parish. This would include the C1189, C1190, Warham Lane, Hill Road, Breinton Lane and Green Lane as well as any other stretches of public highway in Breinton. However the proposed zone would not include the A 438 – Kings Acre Road. The Highways Authority might consider it appropriate to extend the zone marginally to the west into Stretton Sugwas parish where the lane from

Breinton Common rejoins the A438. We have already sought the views of that parish council and are awaiting their response.

### Kings Acre Road

The A438 – Kings Acre Road - is explicitly excluded from our proposed rural speed zone. It is a major radial route to and from Hereford. Unlike Breinton's lanes it already has a 40mph limit for the whole of its length from the parish boundary in the east to way beyond Breinton's western boundary. As Breinton's lanes are currently governed by the national speed limit (60mph) it is ironic that vehicles leaving the parish and going onto the A438 are legally limited to a lower speed on a road that is actually

- wider,
- better surfaced
- well-lit
- has better visibility / drainage / engineered bends etc. and
- is already on the Safer Roads Partnership's radar.

Although the recorded road accident statistics do not reveal a major safety problem along the A438, the Parish Council does get complaints regularly about speeding traffic in the vicinity of the Bay Horse public House, Kings Acre Motors garage (A480 junction) and westwards towards Breinton Lane. The recent (June 2019) accident involving an unmarked police car travelling at speed outside the entrance to the Wyevale Garden Centre added to local concerns at this point. Additional new houses are to be directly opposite in the near future. These concerns will however have to be addressed should further large-scale housing development bordering Kings Acre Road commence as the Core Strategy/Local Plan intends.

There is currently little, if any enforcement activity visible in the parish. We note however; that the Safer Roads Partnership have supported a Community Concern speed monitoring site further west along the 40mph zone beyond Breinton's parish boundary at site of former Kites Nest public house.

Despite these concerns about the A438 the Parish Council recognises that it is part of a much wider set of traffic issues that require different solutions from the rural lanes in the parish and that it should not be part of the rural speed zone that is being proposed in this document. However if these separate solutions included the construction of the long awaited Kings Acre cycleway they would certainly complement the rural speed zone being proposed here.

### Public Support for the proposed zone

Speeding vehicles have been of concern to local residents for many years. In 2003, Herefordshire Council actually commissioned the consulting engineers - Halcrow - to assess the feasibility of a network of Quiet Lanes throughout the county. The report recommended

that the Breinton area should be taken forward as the County's single Quiet Lanes Pilot. Sadly despite the considerable cost of the report @£30k, there were no further resources to make the pilot a reality on the ground at the time. Since then Quiet Lanes have ceased to be an objective of national road policy in rural areas.

In 2014 parishioners gave their views on the issues facing Breinton in a parish wide survey as part of preparing a Neighbourhood Development Plan. 66% of adults in the parish completed the questionnaire - an exceptionally high response - and 62% felt that there were serious traffic or road safety issues in the parish. Two thirds of the respondents felt that speeding vehicles were the major problem and wanted the Parish Council to campaign for speed restrictions or other traffic calming measures.

As noted earlier; Breinton's Neighbourhood Development Plan was approved by Herefordshire Council late in 2016 and is now part of the Local Development Framework guiding land-use planning decisions in the Parish. However it is not possible to pursue Highways Authority matters such as speed restrictions through planning policies hence this separate application for a rural speed zone.

#### Official Support for the proposed zone

In addition to the strong and enduring support of local people; we are also supported by:

- our local MP Bill Wiggin ' road safety is an issue I take particularly seriously'
- County Councillor Bob Matthews.
- The Institute of Advance Motorists 'it is obvious that on narrow roads a speed considerably less than the national speed limit for cars – 60mph – is totally appropriate, Very often 30mph is also inappropriate. Herefordshire Advanced Drivers is happy to support any initiative that will help make our roads safer for vehicles and other road users'
- The Campaign for the Protection of Rural England ' CPRE nationally believes that speed limits on some rural roads in England should be reduced from 60mph to 40mph and that the best solution is to use 40mph zones similar to 20mph zones in urban area. The local branch – Herefordshire CPRE is happy to support this initiative'
- The Road Safety Foundation 'wishes us well' as does
- BRAKE ' high speeds, sharp bends, narrow lanes and the presence of vulnerable road users like cyclists make rural roads the most dangerous by far. Rural speed limits should be reviewed. Ultimately we would like to see our default speed limits lowered. BRAKE generally wish initiatives such as ours well'

Breinton has a good and well maintained network of footpaths and bridleways. Our public highways are not only used by residents (many are elderly) going about their daily lives and large agricultural vehicles but also by local running clubs, horse riders, recreational cyclists, walkers on the Wye Valley Way and anglers accessing the bank of the River Wye. The area features in a number of leaflets of local walks including those published by Herefordshire Council. A number of formally organised road running races go through the parish during the year. It is not surprising therefore that both the

- Wye Valley Runners ‘supports our campaign to get a rural 40mph zone in Breinton’ and
- The Herefordshire Association of Anglers say ‘this is a good idea and 40mph is plenty fast enough for such a rural area

ROSPA believe that ‘Inappropriate speed is a major contributory factor in many road crashes and casualties’ but they inform us that it is not their policy to comment on specific locations.

The Herefordshire Association of Local Councils (HALC) have discussed our proposal and rather than promote a county wide campaign for speed reductions in rural areas have chosen to leave each individual council to make their own case.

We have also contacted the Safer Roads Partnership. However as West Mercia Police would be consultees in any legal process to change a speed limit they feel the need to maintain a neutral stance at this stage.

### Monitoring and enforcing the new Zone

It has to be accepted that the existing 60mph national speed limit is neither monitored nor capable of being enforced. Nor will it ever be a sufficiently high priority. Reducing the speed limit will not change this. Other than long standing local concerns we cannot factually demonstrate that there is a speeding problem nor do the limited local traffic counts, in connection with new housing developments, indicate a sufficient volume of traffic for the Safer Roads partnership to attempt to identify a suitable enforcement site. We do not consider that rural Breinton is suitable for SID’s although the Kings Acre Road (A438) might be.

Reducing the speed limit will not fully address the problem which local residents experience on a daily basis. The proposed rural speed zone will not be any more, or any less, easy to enforce or monitor. However what it will do is raise awareness of driving conditions locally and we are convinced that it will make our roads safer for all types of user. We have been fortunate so far not to have had a death or serious injury in the lanes although accidents have recorded on the northern parish boundary along the A438.

### Conclusion

Our proposal goes with the grain of public, political and legal opinion and is achievable. We are not the only local council seeking to reduce speed limits in the area surrounding Hereford city and are aware that Holmer and Shelwick Parish Council addressed this issue in 2018.

We accept that there is no history of collisions on our lanes and cannot show what the existing mean vehicle speed is. However speed limits on single carriageway rural roads should also take into account other factors such as the roads function, use by and risks to

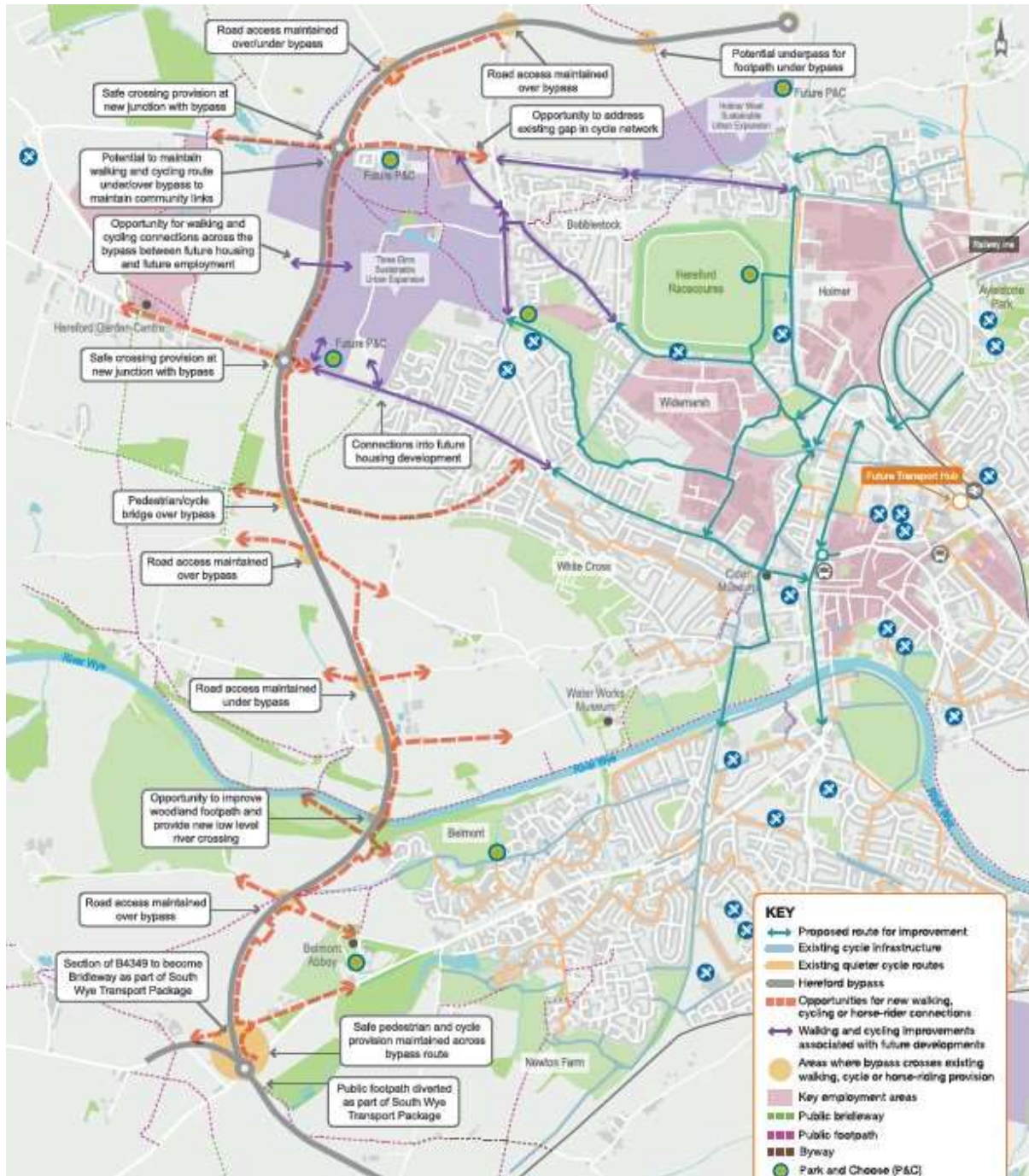
vulnerable road users, road geometry and engineering and the road environment. The main functions of our lanes are for local access to domestic properties, farms and orchards as well as for recreation use. Thus environmental and community benefits are of greater importance in Breinton than on roads with more of a through traffic function.

Government policy is that a 30mph speed limit should be the norm in villages and we believe that Breinton Common could meet the criteria both in terms of the number of houses and in the length of road through the settlement. However the lanes in either direction from Breinton Common are both narrow, with tight bends and we do not want individual small parts of the parish to be dealt with in different ways. We are seeking a parish wide approach. In our view Breinton's C and Unclassified lanes are ideal for the introduction of a zonal rural speed limit.

We urge you to seriously consider our proposal and look forward to discussing with you how this might be brought about it in the near future.

***Submission Approved by the Parish Council – 17<sup>th</sup> September 2019***

# APPENDIX 1- Extract from the Hereford Transport Package consultations (January – March 2019)





Appendix 2 – Breinton Parish and Neighbourhood Planning Area  
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