

Members are reminded that they must declare all relevant pecuniary and non-pecuniary interests relating to any items of business to be discussed at this meeting

BIRMINGHAM CITY COUNCIL

JOINT CABINET MEMBER AND CHIEF OFFICER

WEDNESDAY, 07 FEBRUARY 2018 AT 00:00 HOURS
IN CABINET MEMBERS OFFICE, COUNCIL HOUSE, VICTORIA
SQUARE, BIRMINGHAM, B1 1BB

A G E N D A

3 - 80

1 20MPH PILOT AREA B2 ("THE PROJECT") - OBJECTIONS TO
TRAFFIC REGULATION ORDERS

Item Description

BIRMINGHAM CITY COUNCIL

PUBLIC REPORT

Report to: CABINET MEMBER FOR TRANSPORT
AND ROADS JOINTLY WITH
Report of: CORPORATE DIRECTOR, ECONOMY
INTERIM ASSISTANT DIRECTOR TRANSPORTATION
AND CONNECTIVITY
Date of Decision: 5 February 2018
SUBJECT: 20MPH PILOT AREA B2 ("the Project") – OBJECTIONS
TO TRAFFIC REGULATION ORDER
Key Decision: No Relevant Forward Plan Ref:n/a
If not in the Forward Plan: Chief Executive approved ☐
(please "X" box) O&S Chair approved ☐
Relevant Cabinet Member(s) or Councillor Stewart Stacey – Transport and Roads
Relevant Executive Member:
Relevant O&S Chair: Councillor Zafar Iqbal – Economy, Skills and Transport
Wards affected: Edgbaston, Harborne, Selly Oak and Bournville

1. Purpose of report:

- 1.1 To provide details of the objections and comments received, as given in Appendix D, to the proposal to introduce a 20 miles per hour (mph) speed limit and consolidate existing 20mph speed zones as shown on drawing nos. CA-02714_09_01_01_0001 to CA-02714_09_01_01_0006 and CA-02714_09_01_01_0013, attached as Appendix B.
- 1.2 To seek approval to proceed with the implementation of the Project having considered the responses to the objections received as set out in Appendix A.

2. Decision(s) recommended:

That the Cabinet Member for Transport and Roads jointly with the Corporate Director, Economy:

- 2.1 Authorise the Assistant Director – Transportation and Connectivity to proceed having regard to the responses to the objections as set out in Appendix A with the implementation of the Project to introduce and consolidate a 20mph speed limit and consolidate existing 20mph speed zones as shown on drawing nos. CA-02714_09_01_01_0001 to CA-02714_09_01_01_0006 and CA-02714_09_01_01_0013, attached as Appendix B.
- 2.2 Authorise the City Solicitor to negotiate, execute, seal and complete all necessary documents to give effect to the above recommendations.

Lead Contact Officer(s): Varinder Raulia, Head of Infrastructure Projects
Telephone No: 0121 303 7363
E-mail address: Varinder.raulia@birmingham.gov.uk

3. Consultation

Consultation should include those that have an interest in the decisions recommended

3.1 Internal

- 3.1.1 The Ward Councillors have been consulted on the scheme proposals and their feedback was reported as part of the Full Business Case report (FBC). Any comments/objections received during the statutory period are given in Appendix A.

3.2 External

- 3.2.1 The stakeholder groups were consulted and their feedback was reported as part of the FBC report. Any comments/objections received during the statutory period are given in Appendix A.
- 3.2.2 The key stakeholder groups consulted include Push Bikes, Birmingham Friends of the Earth, National Express, Transport for West Midlands, West Midlands Police, West Midlands Fire Service, NHS and Royal Mail.
- 3.2.3 The statutory advertisement for the proposed Traffic Regulation Order was advertised in the press and on-street from 10th July 2017 to 21st August 2017. A letter along with the notice was also delivered to approximately 30,000 residents/businesses within the affected wards.
- 3.2.4 A number of objections/comments were received from local residents. Further details are given in Appendix A and Appendix D.
- 3.2.5 The key issues raised were regarding the enforcement of the proposed speed limits, the impact on air quality and what data was being used to support the proposed 20mph speed limits. Further details are given in Appendix A and Appendix D.
- 3.2.6 Requests were received to include or exclude roads from the proposed Order; these have been considered alongside the other objections received.

4. Compliance Issues:

4.1 Are the recommended decisions consistent with the Council's policies, plans and strategies?

- 4.1.1 The BCR programme supports the City Council's policy objectives as outlined in the Vision and Forward Plan approved in May 2017, in particular 'investment in infrastructure and improved connectivity', 'development of a...transport system that promotes and prioritises sustainable journeys', 'creating a healthier environment', and 'more people walking and cycling'. The measures also support the policies within the Birmingham Development Plan (BDP), the aspirations of Birmingham Connected, the Health and Wellbeing Strategy, and the West Midlands Strategic Transport Plan.

4.2 Financial Implications (How will decisions be carried out within existing finances and Resources?)

- 4.2.1 The financial implications of this Project were covered in the Full Business Case (FBC) Report approved by Cabinet Members for Transport and Roads and Value for Money and Efficiency jointly with the Corporate Director for Economy on 25th May 2017 titled '20MPH Pilot Area B2- Full Business Case '. The Project cost is £735,000 which will be funded

from the GBSLEP Local Growth Fund (for BCR Phase 2).

4.2.2 Provision was made within the Project costs for dealing with any objections received to the Traffic Regulation Order.

4.2.3 There are no further implications to the approved costs as a result of the changes recommended within this report.

4.3 Legal Implications

4.3.1 Birmingham City Council derives its authority for implementing works on the public highways from the Highways Act 1980, the Road Traffic Regulation Act 1984, Traffic Management Act 2004 and the Transport Act 2000 as amended.

4.3.2 With respect to Section 122 of the Road Traffic Regulation Act 1984 the following assessments have been carried out:

- A high-level literature review was undertaken of readily available publications and reports to investigate what studies have been undertaken that consider the impacts of 20 mph traffic management measures on air quality and is attached to this report as Appendix E. While there is no general consensus within the reviewed evidence to suggest, one way or the other, that driving at lower free-flow speeds causes increases or decreases in local pollutant emissions, studies tend to agree that in locations where traffic flows are low, such as on residential roads, the impact of a 20mph limit intervention is not necessarily detrimental to ambient local air quality.
- Majority of the literature available for the high-level review is based on 20mph zones which include traffic calming features. The proposals as part of this scheme are limited to an area wide speed reduction of 20mph through signs and road marking and do not include any traffic calming measures and hence a direct comparison cannot be made between 20mph zones and 20mph areas.
- Although the high-level literature review is inconclusive in regards to the impact on air quality, it is expected that in the long term vehicles speeds will reduce and more people will shift to the use of alternative modes of transport such as walking and cycling. It is considered that the expected reduction in accidents as a result of these reduced speeds and the changes in travel behaviour over time will outweigh any potential impact on air quality.

4.3.4 Project risks were covered in the FBC report.

4.4 Public Sector Equality Duty (see separate guidance note)

4.4.1 An Equality Analysis was completed in February 2017, and was attached to the FBC which was approved on 25th May 2017 and is attached to this report as Appendix C.

5. Relevant background/chronology of key events:

5.1 As detailed in the FBC approved on 25th May 2017, the Project includes the introduction of the fourth 20 mph pilot area, known as Area B2.

5.2 The pilot 20mph speed limit areas are part of the Birmingham Cycle Revolution Programme, which is funded from the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) Local Growth Fund (for Birmingham Cycle Revolution (BCR)

Phase 2).

- 5.3 The speed limit change is part of a package of measures included within the Birmingham Cycle Revolution programme to support walking and cycling and improve road safety. This will include city-wide and local promotion of the benefits of 20mph speed limits to encourage compliance together with 'wrap-around' measures including road safety education, travel planning and cycle training.
- 5.4 The proposals for Area B2 include reductions in the speed limit to 20mph on the majority of residential, retail and industrial roads in accordance with the 20mph Speed Limit Policy approved by Cabinet on 17th March 2014.
- 5.5 20mph is also proposed on main roads through recognised local centres.
- 5.6 Additional roads were advertised as part of the statutory consultation which were not included in the Full Business Case report. The additional roads included are: Arthur Road (from Church Road to Carpenter Road), Pritchatts Road – from Farquhar Road to Edgbaston Park Road, Vincent Drive – New Foss Way to Pritchatts Road, Wheelleys Road- from Carpenter Road to Lee Bank Middleway.
- 5.7 Further to the statutory consultation there have been no specific objections to the additional roads proposed to be included in the 20mph area.
- 5.8 A number of objections/comments were received from local residents. Further details of the objections and the design team responses are given in Appendix A.
- 5.9 Following statutory consultation the scheme is to be implemented as per the proposals in the original FBC with the addition of those roads identified in section 5.6 above.
- 5.10 The physical measures within the 20mph limit will include:
- Installation of new 20mph and 30mph speed limit signs, posts, associated ground works, and electricity connections where signs have to be illuminated.
 - The removal of existing 20mph zone signs and posts where required, and ground works to make good the footways.
 - The removal of redundant 30mph and 40mph speed limit signs and posts, and ground works to make good the footways.
 - Painting of repeater signs on the carriageway in the form of 20mph Roundels.
 - Installation of repeater signs on existing lighting columns or on new posts where required.
- 5.11 Following approval of this report, works are programmed to start in March 2018 and the Traffic Regulation Order is expected to be operational early in August 2018.

6. Evaluation of alternative option(s):

- 6.1 Alternative options were considered at the consultation stage through discussion with residents and Ward Councillors and these were presented in the FBC.

7. Reasons for Decision(s):

- 7.1 The approval of this report will allow the Area B2 20mph pilot scheme to progress to implementation.

Signatures**Date**

Councillor Stewart Stacey
Cabinet Member for Transport and Roads

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Waheed Nazir
Corporate Director, Economy

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List of Background Documents used to compile this Report:

1. Full Business Case Report approved by on 25th May 2017 titled: '20mph Pilot Area B2– Full Business Case '.
2. Cabinet Report approved on 17th March 2014 titled: '20mph Speed Limit Policy'.

List of Appendices accompanying this Report (if any):

1. Appendix A – Summary of Objections to the Traffic Regulation Order and Responses.
2. Appendix B – Scheme Plan – Drawing Number: CA-02714_09_01_01_0001 to CA-02714_09_01_01_0006 and CA-02714_09_01_01_0013.
3. Appendix C – Equality Analysis
4. Appendix D – Objections
5. Appendix E – Literature Review: Local Air Quality and 20mph Limits

PROTOCOL PUBLIC SECTOR EQUALITY DUTY

- 1 The public sector equality duty drives the need for equality assessments (Initial and Full). An initial assessment should, be prepared from the outset based upon available knowledge and information.
- 2 If there is no adverse impact then that fact should be stated within the Report section 4.4 and the initial assessment document appended to the Report duly signed and dated. A summary of the statutory duty is annexed to this Protocol and should be referred to in section 4.4 of executive reports for decision and then attached in an appendix; the term 'adverse impact' refers to any decision-making by the Council which can be judged as likely to be contrary in whole or in part to the equality duty.
- 3 A full assessment should be prepared where necessary and consultation should then take place.
- 4 Consultation should address any possible adverse impact upon service users, providers and those within the scope of the report; questions need to assist to identify adverse impact which might be contrary to the equality duty and engage all such persons in a dialogue which might identify ways in which any adverse impact might be avoided or, if avoidance is not possible, reduced.
- 5 Responses to the consultation should be analysed in order to identify:
 - (a) whether there is adverse impact upon persons within the protected categories
 - (b) what is the nature of this adverse impact
 - (c) whether the adverse impact can be avoided and at what cost – and if not –
 - (d) what mitigating actions can be taken and at what cost
- 6 The impact assessment carried out at the outset will need to be amended to have due regard to the matters in (4) above.
- 7 Where there is adverse impact the final Report should contain:
 - a summary of the adverse impact and any possible mitigating actions (in section 4.4 or an appendix if necessary)
 - the full equality impact assessment (as an appendix)
 - the equality duty (as an appendix).

Equality Act 2010

The Executive must have due regard to the public sector equality duty when considering Council reports for decision.

The public sector equality duty is as follows:

- 1 The Council must, in the exercise of its functions, have due regard to the need to:
 - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by the Equality Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 2 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
 - (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 3 The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- 4 Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
 - (a) tackle prejudice, and
 - (b) promote understanding.
- 5 The relevant protected characteristics are:
 - (a) marriage & civil partnership
 - (b) age
 - (c) disability
 - (d) gender reassignment
 - (e) pregnancy and maternity
 - (f) race
 - (g) religion or belief
 - (h) sex
 - (i) sexual orientation

SUMMARY OF OBJECTIONS TO TRAFFIC REGULATION ORDER AND RESPONSES

SCHEME: 20MPH PILOT AREAS: AREA B2

OBJECTION PERIOD OF TRO ADVERT: 10th July 2017 to 21st August 2017

Objections:

This table summarises and provides a response to the key issues raised in the individual objections. The complete text contained within each correspondence is provided in Appendix D.

TOTAL NUMBER OF OBJECTION	SUMMARY OF OBJECTION	RESPONSE
116	<p>Enforcement and Speed</p> <p>Concerns regarding the enforcement of 20mph, current speed limits are not being enforced.</p> <p>Drivers driving in excess of 30mph will continue to drive at high speeds and will put other road users at risk by carrying out dangerous manoeuvres.</p> <p>20mph will only be effective if it is supported by Traffic Calming.</p>	<p>20mph speed limits are enforceable in the same way as any other speed limit – though they are enforced by roadside activity (utilising calibrated speed measurement devices) but not at this time by speed cameras (fixed or mobile). The council has the full support of the police in enforcing the speed limits but resources are limited – it is important that drivers are educated on the reasons behind 20mph limits as part of this process. The council keeps a log of locations reported to us where drivers are not sticking to the 20mph speed limits and we have actively sought this feedback from our communities via social media. Please note that it is not always possible for them to respond to all enforcement requests straight away and other operational considerations and emergencies sometimes have to take priority.</p> <p>A key part of 20mph limits is community engagement, education and targeted enforcement.</p> <p>As you will be aware these schemes are signs and lines only, they involve no physical traffic calming, and are part of a longer term approach to change driver attitudes and behaviour – the idea is that over time attitudes to speeding in residential areas will change in the way that they have towards seatbelts or drink driving for most people. A key part of 20mph limits is community engagement, education and targeted enforcement.</p> <p>20mph speed limit areas without traffic calming are considerably less expensive to implement, which means that wider areas can be covered. Due to the wide area of this scheme, no traffic calming will be installed however following the monitoring period, an assessment will be carried out to determine if any further measures are</p>

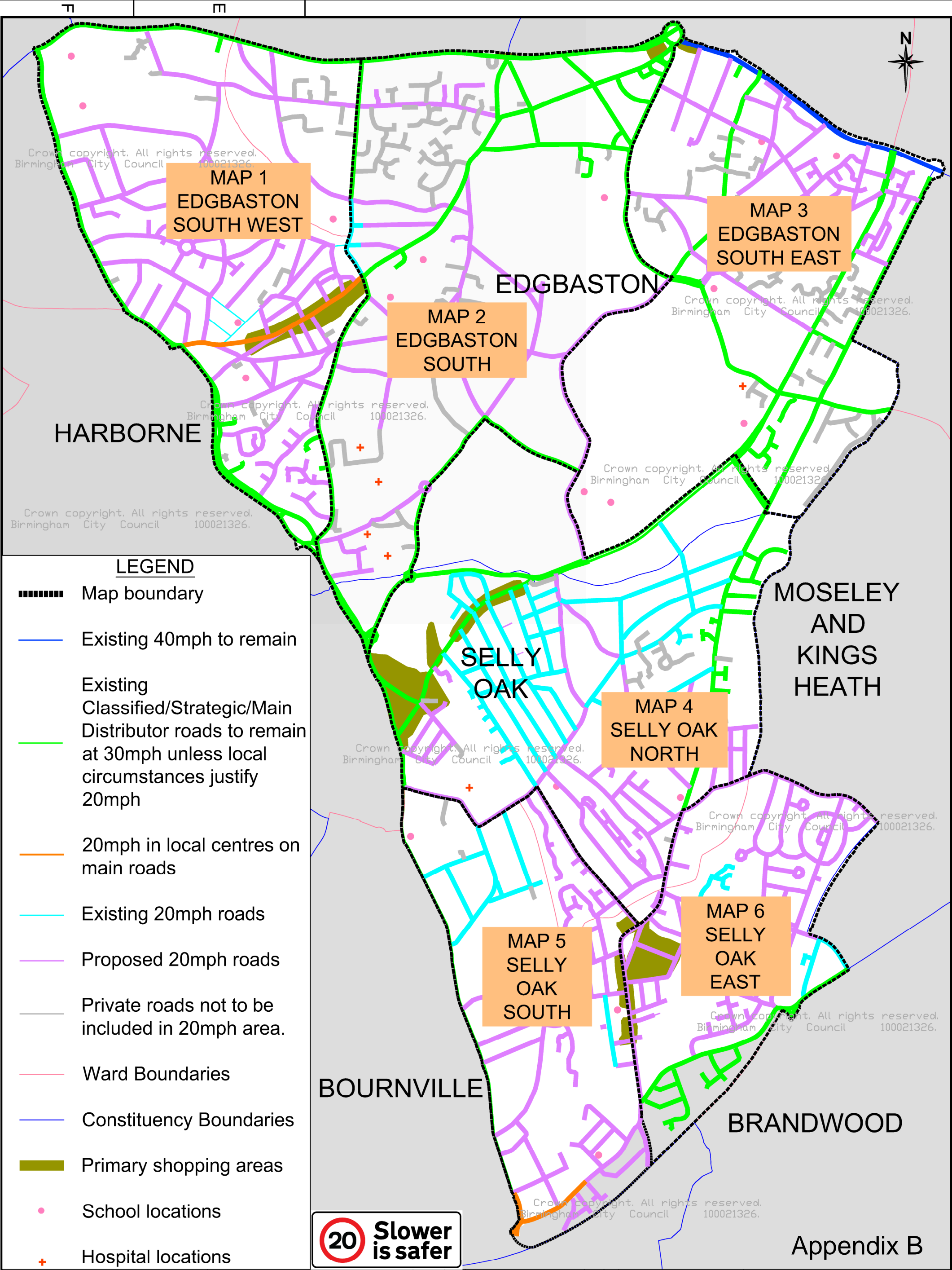
	<p>Will the speed limit apply to cyclists as they can cycle faster than 20mph?</p> <p>Safety concerns as drivers will be more focused on the speed and not the road.</p> <p>20mph will increase journey times.</p> <p>25mph should be considered as a compromise.</p> <p>20mph should be limited to targeted areas, such as outside schools, otherwise it will be ignored.</p>	<p>required.</p> <p>The Highway Code rule 124 is clear on keeping within speed limits, but does not specifically make reference to cyclists. Penalties for pedal cyclists are less about speed but more about the issue of dangerous cycling created by high speed. We would advise all road users to adhere to the speed limit.</p> <p>Regardless of the speed limit, drivers should always be aware of the speed that they are travelling at. The Department for Transport (DfT) states that there is clear evidence that reducing traffic speeds reduces collisions and casualties. Collisions are less frequent at lower speeds; and where collisions do occur the risk of fatal injury is also reduced.</p> <p>20mph will mainly apply on residential street and in selected locations on main roads. Most main roads will keep their existing 30mph or 40mph speed limits, so once drivers leave residential areas and join the main road network there should be no impact on journey times. The vast majority of the city's traffic travels on the 10% of the road network that will stay at 30mph or 40mph. The parts of the journey affected would only be the relatively short sections of that journey that would be on 20mph roads in order to reach the main road network.</p> <p>25mph is not a prescribed national speed limit and cannot be used on public roads</p> <p>20mph limits (as opposed to targeted traffic calmed zones) are not intended as a blunt instrument to reduce vehicle speeds. They are one part of a process of long term behaviour change – the idea is that over time attitudes to speeding in residential areas will change in the way that they have towards seatbelts or drink driving for most people. The larger the area implemented the more consistent the speed limit becomes. This makes it easier to embed slower driver behaviour as the norm. Wider 20mph speed limit areas also encourage a more holistic approach to travelling to school by promoting slower speeds, and enabling walking and cycling to school and around the community streets.</p> <p>After reviewing Solihull Council's evaluation of their 20mph speed limit trial outside of schools, it concluded that there was very little evidence to suggest that the speed limit trial was successful, and recommended that no further 20mph speed limits be introduced outside schools (See report dated 7th July 2016, titled "Solihull Part Time 20mph Speed Limit Pilot Study").</p>
16	<p>Pollution/Air Quality</p> <p>Concerns regarding air quality due to higher emissions and pollution caused by using lower</p>	<p>As part of the baseline study we will use diffusion tubes to measure air quality. We will be carrying</p>

	gears.	<p>out this process again as part of the 3 year assessment.</p> <p>The introduction of 20mph speed limits aims to help make our roads safer which will in turn give people greater confidence to walk or cycle. Making local trips on foot or by bicycle instead of by car is a good way to reduce emissions and make our air better to breathe. Adopting a smoother driving style can also help. These 20mph schemes are signs and lines only, and involve no physical traffic calming. This type of scheme encourages drivers to maintain a reduced, steady pace along the whole stretch of road, rather than road humps that may increase acceleration and braking-related emissions.</p> <p>The latest advice from the National Institute for Health and Care Excellence (NICE) recommends 20mph limits to improve air quality stating that 'smoother driving means cleaner air' see: http://road.cc/content/news/226044-nice-recommends-20mph-limits-improve-air-quality.</p>
33	<p>Scheme</p> <p>Concerns were raised regarding some small cul-de-sacs being included in the proposals as well as concerns regarding some cul-de-sacs not being included.</p> <p>The scheme will increase street clutter with little benefit.</p> <p>Through routes should not be reduced to 20mph.</p> <p>Do the Council have authority to implement speed limits on private roads?</p>	<p>Small cul-de-sacs have been left at the speed limit of the road they come off. In accordance with the guidance provided by DfT, the minimum length of a speed limit should be 300m. This will also reduce sign clutter and reduce future maintenance costs.</p> <p>Where possible, new signs will be installed onto existing posts and lamp columns. Any existing signs and furniture which is not required will also be removed.</p> <p>Majority of the through routes have maintained their existing speed limits.</p> <p>Every Highway Authority has the authority to introduce Traffic Regulation Orders on any Highway within their area, regardless of whether that Highway is a public Highway or a private Highway. In proposing the speed limit on this private road it is BCCs opinion that it falls within the common law definition of 'Highway'.</p> <p>Whilst the private roads are not "highways maintainable at public expense", they are still deemed in law as being "a highway". The question of jurisdiction for the police to apply and enforce traffic laws applies to all highways including private roads; in the same way drivers would be subject to the rules of the road if they were not wearing a seat belt, had an unroadworthy vehicle, had children travelling without booster seats, etc.</p>

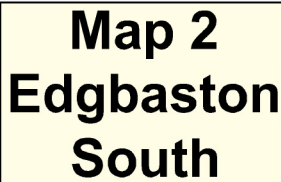
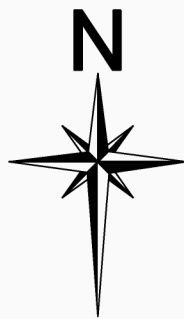
	<p>Only having 20mph in certain wards will cause inconsistency and confusion.</p> <p>Harborne TRO Objection Consideration Public Report, dated 24 March 2016 of the Acting Strategic Director, Place states that the council will include the section of Lordswood Road, from the roundabout at Lordswood Road / War Lane to the roundabout Lordswood Road / Court Oak Road in the 20mph limit Area B2 scheme.</p>	<p>Whilst the council remains committed to rolling out 20mph limits to residential roads city-wide, we are currently still in the process of implementing the wider substantial pilot area. We will be reviewing the data from the first 12 months of current areas before further developing the programme for roll out to other areas.</p> <p>During the consultation for the Area B2 20 mph proposals during September 2016. Changes to the speed limit along Lordswood Rd was assessed, however, it was decided that in order to maintain sufficient traffic flow through that area of Lordswood Road it would will remain at its current speed limit. The FBC for Area B2 which was signed off in May 2017 made reference to this decision.</p>
12	<p>Data</p> <p>Concerns have been raised that there is not sufficient speed/accident data for the Edgbaston area to justify the speed reduction.</p> <p>Data from previous 20mph limits should be analysed before proceeding with any further schemes.</p> <p>Report from Open University suggests that 20mph limits do not work. Manchester City Council is also not proceeding with any further 20mph schemes.</p>	<p>The council is committed to the roll out of 20mph speed limits areas in all residential areas. The pilot schemes were prioritised on the basis of the number and severity of road traffic collisions, particularly those involving child pedestrians, and also some consideration to the conditions of the funding for example the potential to increase cycling in an area.</p> <p>Area B2 (Central South West) was the fourth area to be prioritised as:</p> <ul style="list-style-type: none"> • It had one of the highest levels of public support in the initial consultation. • It is an area where there are existing cyclists and significant scope to grow that number. • It joins with the previous area which was implemented so helps to create a single wider 20mph area. • It has a relatively high level of road traffic crashes. Between 2010-2012 there were a total of 534 collisions. <p>Data from the previous scheme is being collected and will be considered before implementing any further 20mph schemes around Birmingham. Area B2 was selected and approved as a Pilot Area along with the previous three schemes which have been delivered. Due to budget availability the current scheme is being delivered after the original 3 schemes.</p> <p>20mph limits are not just a road safety measure. In Birmingham they are part of a wider behaviour change campaign 'Slower is Safer'. Therefore, when assessing their value and effectiveness, it is important to consider increases in walking and cycling and improvements in quality of life indicators, such as</p>

		<p>health improvements, community cohesion and better air quality, as well as reductions in vehicle speeds and road crashes and casualties.</p> <p>Already more than half of the largest 40 urban authorities in the UK have a policy of setting 20mph as the default for all their streets. A report into 20mph speed limits areas, commissioned by the DfT, has provided 'very positive interim results', according to 20's Plenty for Us. The interim results of the study, based on thousands of interviews and questionnaires in 15 case study areas, reveal that 75% of those interviewed supported 20mph limits after implementation, compared with 50% before. Two thirds of drivers interviewed said the new limits were a 'good idea'. 60% of residents thought that 20mph had provided a safer environment, while three quarters felt that 20mph limits were beneficial for their community (http://www.roadsafetygb.org.uk/news/4925.html)</p>
6	<p>Consultation</p> <p>Concerns raised that during the original consultation in 2013, there have been a high number of objections but the Council are still continuing to implement further 20mph limits around the city.</p> <p>The statutory consultation for Area B2 was carried out during the holiday period, not giving residents the opportunity to object.</p>	<p>Previous City-wide public and stakeholder consultation was undertaken on the 20mph policy in Autumn 2013. The overall results of the consultation were mixed, but with significant support in certain areas. All local Councillors were consulted – the majority who responded were supportive, and were particularly in favour of 20mph limits near to schools.</p> <p>Stakeholders were generally supportive. The outcome of this consultation was reported in the 20mph Policy Report to Cabinet in March 2014, and was used as one of the criteria for determining the extent of the initial 20mph schemes.</p> <p>The standard period for a statutory consultation is 21 days; however the consultation period for Area B2 was from 10th July 2017 to 21st August 2017. This exceeds the minimum requirements and allows sufficient time for residents to respond either side of their holidays.</p>
11	<p>Financial</p> <p>As the Council is short on resources, the budget for this scheme should be used elsewhere</p> <p>How will these proposals be affected by the Government's recent announcement to invest £255m pounds to help address environmental</p>	<p>The scheme is to be funded from Central Government and the funding cannot be used for other purposes. The primary aim of the 20mph limit is to reduce collisions in residential areas. Road traffic collisions in Birmingham cost the local economy an estimated £176 million a year. Despite the costs involved in creating more 20mph streets, investing in 20mph could not only save lives but also money in the future.</p> <p>The 20mph speed limit schemes are signs and lines only; they involve no physical traffic calming, and are part of a longer term approach</p>

	<p>concerns? Part of this money is aimed at reducing the number of traffic calming measures.</p>	<p>to change driver attitudes and behaviour. This type of scheme encourages drivers to maintain a reduced, steady pace along the whole stretch of road, rather than road humps that may increase acceleration and braking-related emissions. As part of the baseline study we will use diffusion tubes to measure air quality. We will be carrying out this process again as part of the 3 year assessment.</p> <p>The introduction of 20mph speed limits aims to help make our roads safer which will in time give people greater confidence to walk or cycle. Making local trips on foot or by bicycle instead of by car is a good way to reduce emissions and make our air better to breathe. Adopting a smoother driving style can also help.</p> <p>The latest advise from The National Institute for Health and Care Excellence (NICE) recommends 20mph limits to improve air quality stating that 'smoother driving means cleaner air' see: http://road.cc/content/news/226044-nice-recommends-20mph-limits-improve-air-quality</p>
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
Appendix B



LEGEND - (Proposed)

- Map boundary
- Proposed 20mph
- Existing 20mph
- Existing 40mph
- Proposed 20mph in local centres
- Classified and other roads to remain at 30mph
- Private roads not to be included in 20mph area
- Primary shopping areas



 **Birmingham City Council**
ANNE SHAW
ASSISTANT DIRECTOR
TRANSPORTATION AND CONNECTIVITY
1 LANCASTER CIRCUS
BIRMINGHAM B4 7DQ

SCHEME

MAP 1

BIRMINGHAM CYCLE REVOLUTION

BCR PHASE 2

20mph AREAS

DATE		REV.		REVISIONS				DRN	PM	
DRAWN DAF	05/05/16	DESIGNER RSM		PM AW		REVISION -		SCALE NTS		



ISO
9001
Quality
Management

ice
institute of civil engineers

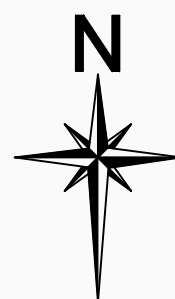
**award
winner**

2014

ICE West Midlands Annual Awards

DWG No.

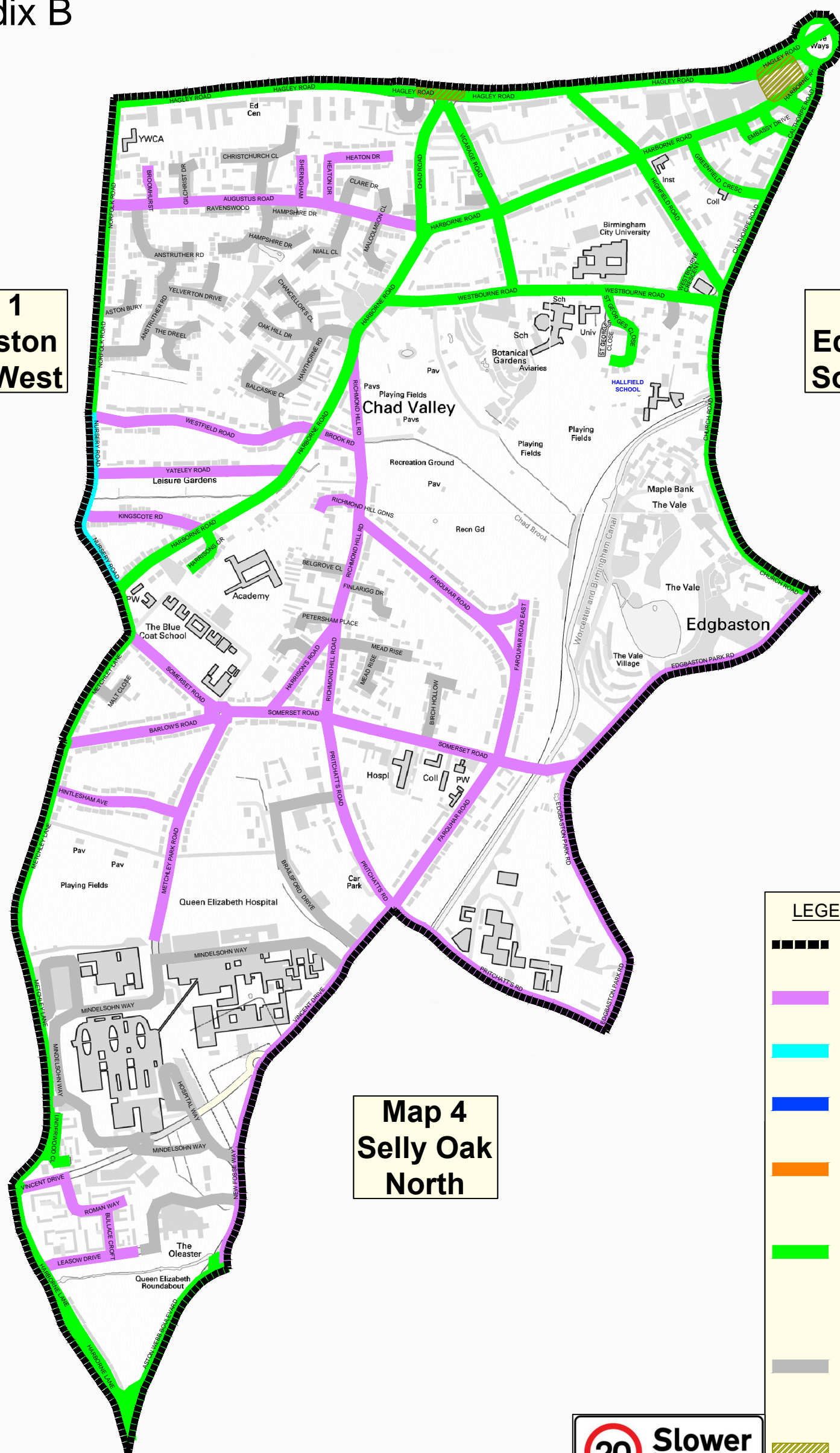
Appendix B



Map 1 Edgbaston South West

Map 3 Edgbaston South East

Map 4
Selly Oak
North



LEGEND - (Proposed)

■■■■■ Map boundary

Proposed 20mph


Existing 20mph

Existing 40mph

Proposed 20mph in local centres

Classified and other roads to remain at 30mph

Private roads not be included in 20mph area

 Primary shopping areas



Birmingham 20mph Area B2 - Map 3 (Edgbaston South East)

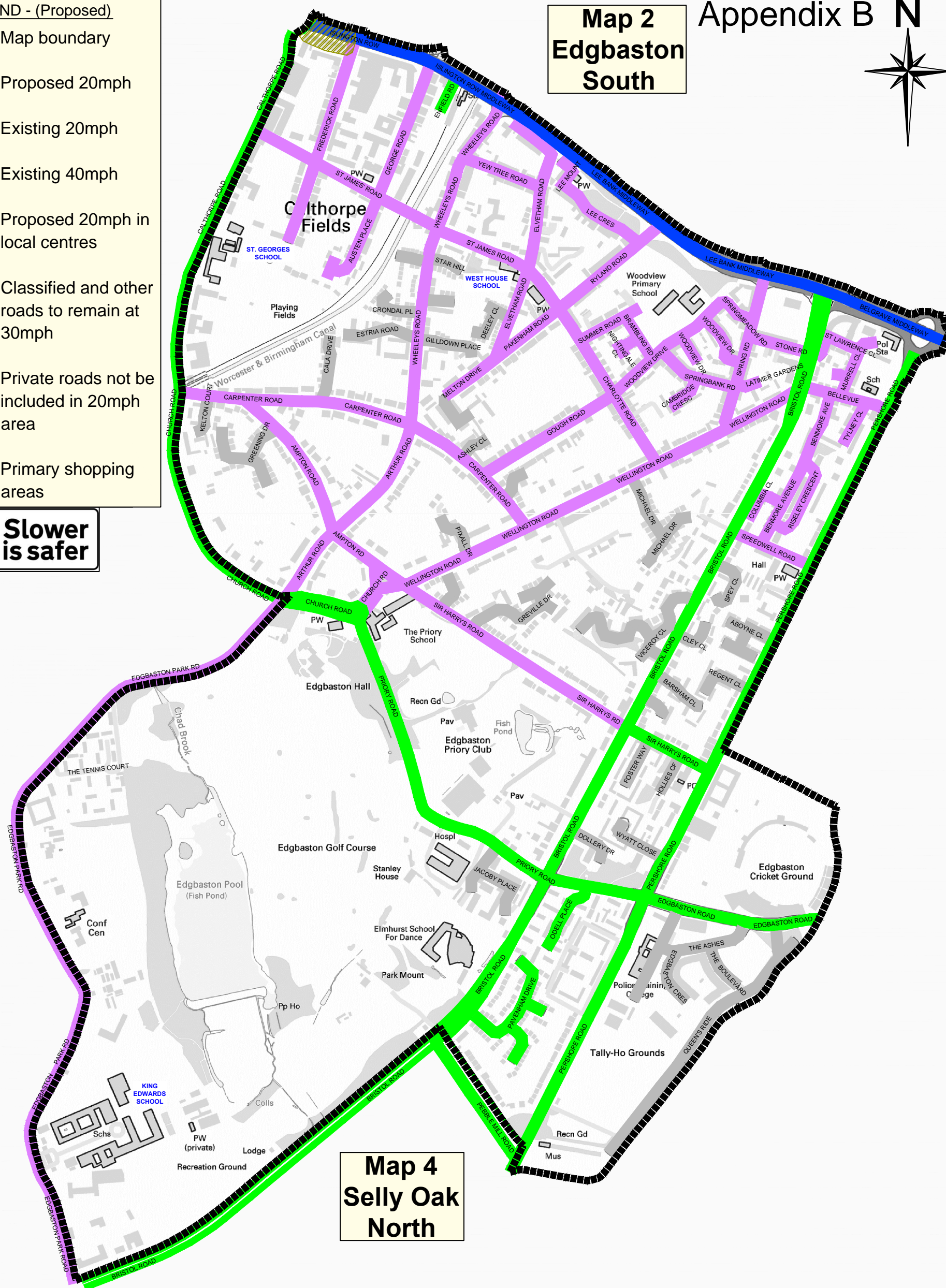
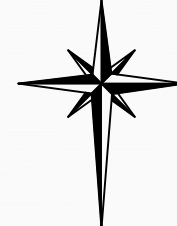
LEGEND - (Proposed)

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- Classified and other roads to remain at 30mph
- Private roads not be included in 20mph area
- Primary shopping areas



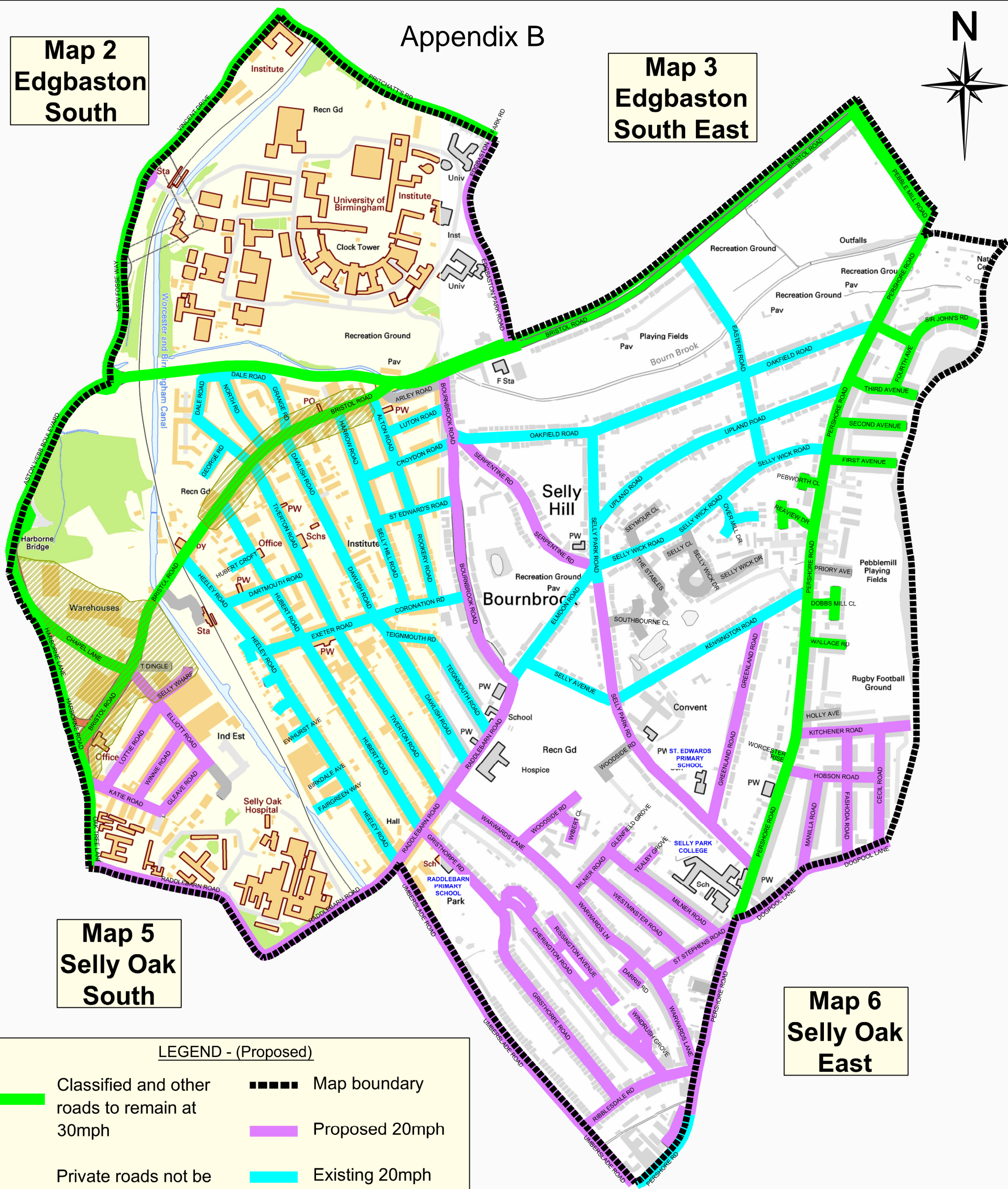
Map 2
Edgbaston
South

Appendix B N











Map 4
Selly Oak
North

Map 3 Edgbaston South East



Map 6
Selly Oak
East

LEGEND - (Proposed)

- | | | | |
|--|---|---|---------------------------------|
|  | Classified and other roads to remain at 30mph |  | Map boundary |
|  | Private roads not be included in 20mph area |  | Proposed 20mph |
|  | Primary shopping areas |  | Existing 20mph |
| | |  | Existing 40mph |
| | |  | Proposed 20mph in local centres |



Birmingham 20mph Area B2 - Map 5 (Selly Oak South)

Appendix B

Map 4
Selly Oak
North



Map 6
Selly Oak
East

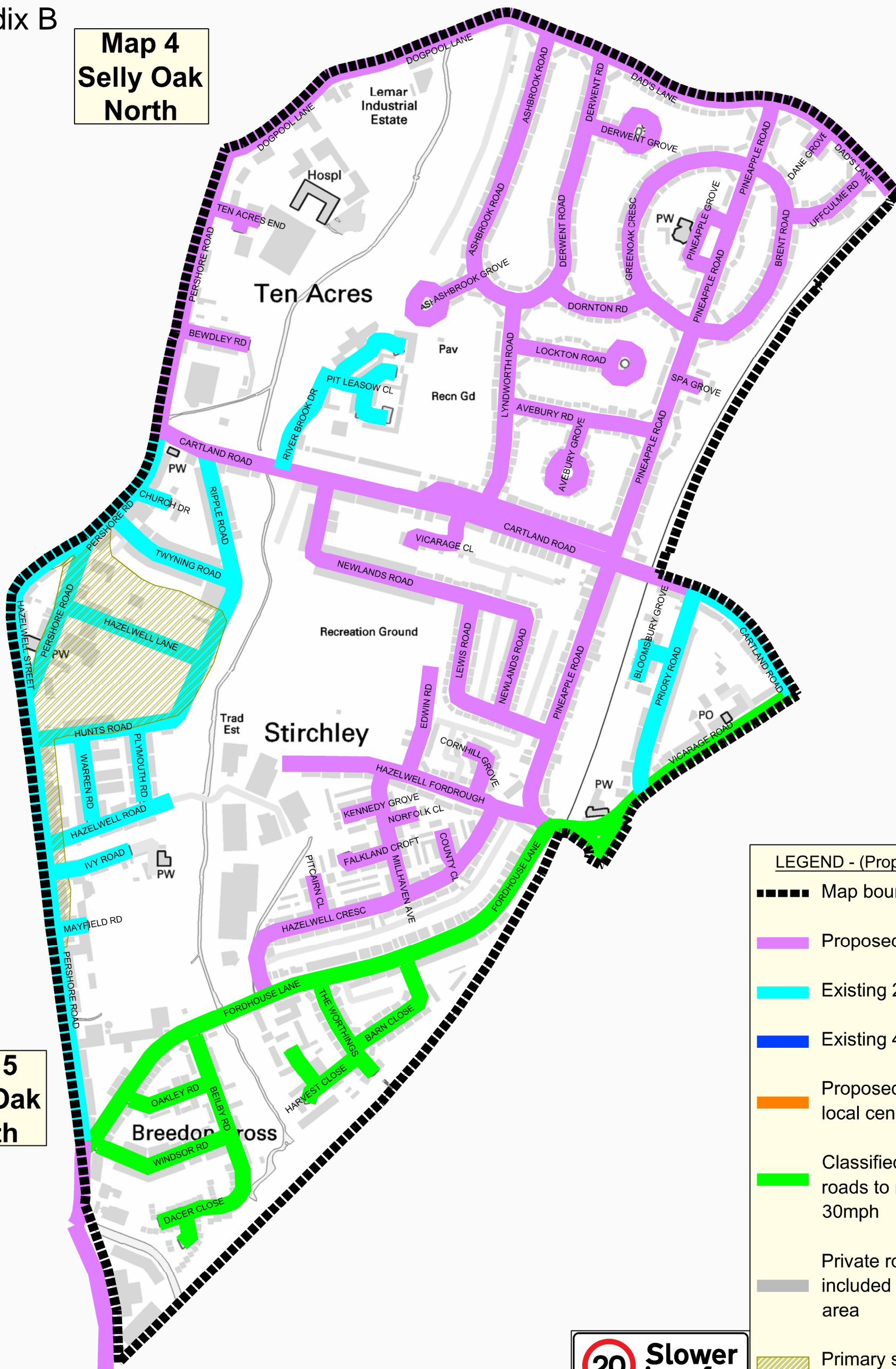
LEGEND - (Proposed)

- Map boundary
- Proposed 20mph
- Existing 20mph
- Existing 40mph
- Proposed 20mph in local centres
- Classified and other roads to remain at 30mph
- Private roads not be included in 20mph area
- Primary shopping areas



Appendix B

Map 4
Selly Oak
North



Map 5
Selly Oak
South



Equality Analysis

Birmingham City Council Analysis Report

EA Name	Birmingham Cycle Revolution - 20mph - Central South West Birmingham Area (B2)
Directorate	Economy
Service Area	Economy - Transport And Connectivity
Type	New/Proposed Function
EA Summary	<p>This EA evaluates the 20mph speed limit proposals for the Central South-West Area of Birmingham, covering all or parts of Edgbaston, Harborne, Selly Oak and Bournville Wards.</p> <p>The 20mph speed limit project has the key objective of improving road safety on residential roads, in local centres and outside schools by reducing the existing 30mph speed limit to 20mph.</p>
Reference Number	EA001483
Task Group Manager	rajpreet.mander@birmingham.gov.uk
Task Group Member	
Date Approved	2017-02-14 00:00:00 +0000
Senior Officer	paul.simkins@birmingham.gov.uk
Quality Control Officer	lesley.edwards@birmingham.gov.uk

Introduction

The report records the information that has been submitted for this equality analysis in the following format.

Initial Assessment

This section identifies the purpose of the Policy and which types of individual it affects. It also identifies which equality strands are affected by either a positive or negative differential impact.

Relevant Protected Characteristics

For each of the identified relevant protected characteristics there are three sections which will have been completed.

- Impact
- Consultation
- Additional Work

If the assessment has raised any issues to be addressed there will also be an action planning section.

The following pages record the answers to the assessment questions with optional comments included by the assessor to clarify or explain any of the answers given or relevant issues.

1 Activity Type

The activity has been identified as a New/Proposed Function.

2 Initial Assessment

2.1 Purpose and Link to Strategic Themes

What is the purpose of this Function and expected outcomes?

The proposal consists of reducing the speed limit from 30mph to 20mph on most residential roads, in local shopping centres and near to schools on main roads within parts of the wards of Edgbaston, Harborne, Selly Oak and Bournville.

The 20mph area in Birmingham was selected based on a city-wide public and stakeholder consultation which was undertaken on the 20mph policy in Autumn 2013. The results of the consultation were mixed but the selected areas for 20mph had the most support.

The selection criteria for the 20mph area is:

- It had one of the highest levels of public support in the initial consultation.
- It is an area where there are existing cyclists and significant scope to grow that number.
- It is contiguous with other 20mph areas so helps to create a single wider 20mph area.
- It has a relatively high level of accidents based on analysis.

This scheme is part of the Birmingham Cycle Revolution Programme which supports the City Council's policy objectives outlined in the Council Business Plan and Budget 2016+, Road Safety Strategy for Birmingham 2016 and other documents, in particular for 'a strong economy' and 'a healthy happy city'. Birmingham Cycle Revolution also addresses the recommendations of the Transport, Connectivity and Sustainability Overview and Scrutiny Committee (TCS O&S) report, 'Changing Gear, Transforming Urban Movement Through Walking and Cycling in Birmingham'. The schemes also support the objectives of the Birmingham Development Plan (BDP), Birmingham Connected, and the West Midlands Strategic Transport Plan.

The scheme will endeavor to have a positive impact on pedestrians and cyclists as it is perceived that they will feel more confident to move around their local community knowing that traffic in their area should be travelling at a reduced speed.

Monitoring will be carried out prior to the scheme being implemented and for a period of 2 years post completion. These results will be compared to see if there has been a reduction in the number of accidents within the 20mph speed limit area.

For each strategy, please decide whether it is going to be significantly aided by the Function.

Children: A Safe And Secure City In Which To Learn And Grow	No
Health: Helping People Become More Physically Active And Well	Yes
Housing : To Meet The Needs Of All Current And Future Citizens	No
Jobs And Skills: For An Enterprising, Innovative And Green City	No

2.2 Individuals affected by the policy

Will the policy have an impact on service users/stakeholders?	No
Will the policy have an impact on employees?	No
Will the policy have an impact on wider community?	Yes

2.3 Relevance Test

Protected Characteristics	Relevant	Full Assessment Required
Age	Relevant	Yes
Disability	Relevant	Yes
Gender	Relevant	Yes
Gender Reassignment	Not Relevant	No
Marriage Civil Partnership	Not Relevant	No
Pregnancy And Maternity	Not Relevant	No
Race	Relevant	Yes
Religion or Belief	Not Relevant	No
Sexual Orientation	Not Relevant	No

2.4 Analysis on Initial Assessment

The proposal consists of reducing the speed limit from 30mph to 20mph on most residential roads, in local shopping centres and near to schools on main roads within parts of the wards of Edgbaston, Harborne, Selly Oak and Bournville.

The introduction of the 20mph speed limit will endeavour to make the roads safer by reducing the number and severity of road traffic collisions.

The scheme will have a positive impact on pedestrians and cyclists as it is perceived that they will feel more confident to move around their local community knowing that traffic in their area should be travelling at a reduced speed.

Reducing the speed limit to 20mph will result in cars and other vehicles travelling slower and will make the alternatives such as walking and cycling safer and more attractive.

A full public consultation was carried out between 1st September and 30th September 2016. A letter was distributed to local residents inviting them to one of the 4 manned exhibitions or one of a number of drop in venues for further information and discussions.

In addition the Consultation was also uploaded onto Beheard during the same period that the Full public Consultation was carried out. At the end of the consultation period, both the consultation feedback and responses from Beheard were collated and a single evaluation exercise was carried out. The consultation feedback commented on roads which were excluded from the 20mph as a result of which, sections of Arthur Road, Pritchatts Road, Vincent Drive and Wheelleys Road have been included to be made 20mph.

No comments were received which were related to the protected characteristics.

3 Full Assessment

The assessment questions below are completed for all characteristics identified for full assessment in the initial assessment phase.

3.1 Age - Assessment Questions

3.1.1 Age - Relevance

Age	Relevant
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3.1.2 Age - Impact

Describe how the Function meets the needs of Individuals of different ages?

The reduction of the speed limit will mean that vehicles are driving at slower speed and the roads will be safer. This will meet the needs of vulnerable road users including the young and elderly who are disproportionately represented in statistics on injuries and road traffic casualties. Any move to reduce the number, severity and fear of accidents will benefit those groups.

Do you have evidence to support the assessment?	No
Do you plan to collect any evidence?	Yes

What evidence will be collected and when?

Monitoring will be carried out prior to the scheme being implemented and for a period of 2 years post completion. These results will be compared to see if there has been a reduction in the number of accidents within the 20mph speed limit area.

You may have evidence from more than one source. If so, does it present a consistent view?	Yes
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3.1.3 Age - Consultation

Have you obtained the views of Individuals of different ages on the impact of the Function?	Yes
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If so, how did you obtain these views?

A full public consultation was carried out between 1st September and 30th September 2016. A letter was distributed to local residents inviting them to attend one of the 4 manned exhibitions or one of a number of drop in venues for further information and discussions.

In addition the consultation was also uploaded onto BeHeard during the same period that the full public consultation was carried out.

Have you obtained the views of relevant stakeholders on the impact of the Function on Individuals of different ages?	Yes
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If so, how did you obtain these views?

A community wide consultation was carried out which also covered the vulnerable road users including the young and elderly who are disproportionately represented in statistics on injuries and road traffic casualties.

Is a further action plan required?	No
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3.1.4 Age - Additional Work

Do you need any more information or to do any more work to complete the assessment?	No
Do you think that the Function has a role in preventing Individuals of different ages being treated differently, in an unfair or inappropriate way, just because of their age?	Yes
Do you think that the Function could help foster good relations between persons who share the relevant protected characteristic and persons who do not share it?	Yes

Please explain how individuals may be impacted.

Vulnerable road users, including the young and elderly, are disproportionately represented in statistics on injuries and road traffic casualties. Any move to reduce the number and fear of accidents will benefit those groups.

Please explain how.

It will make this protected characteristic group more confident to use the local road network and so make them more visible and able to integrate more with their local community.

3.2 Disability - Assessment Questions

3.2.1 Disability - Relevance

Disability	Relevant
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3.2.2 Disability - Impact

Describe how the Function meets the needs of Individuals with a disability?

By reducing the existing speed limit in residential areas, in local centres and outside schools down to 20mph will help improve access, especially for those with restricted mobility, vision, hearing and/or mental health illness. People with a disability will have more confidence to use their local area if they know and feel that traffic is travelling at a slower speed. The ability to get around safely increases opportunities for work and socialising. With low accessibility people can become lonely. Social isolation has been linked to poor mental and physical health and mortality. Health promoting activities like walking, cycling and being outdoors are encouraged as speeds reduce. This builds a positive spiral of increased activity bringing reduced illnesses from diseases associated with obesity, heart disease and stress.

Do you have evidence to support the assessment?	Yes
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Please record the type of evidence and where it is from?

The Marmot Review- Fair Society, Healthy Lives 2009.

Strategic Review of Health Inequalities in England post 2010.

You may have evidence from more than one source. If so, does it present a consistent view?	Not applicable
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3.2.3 Disability - Consultation

Have you obtained the views of Individuals with a disability on the impact of the Function?	Yes
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If so, how did you obtain these views?

A full public consultation was carried out between 1st September and 30th September 2016. A letter was distributed to local residents inviting them to attend one of the 4 manned exhibitions or one of a number of drop in venues for further information and discussions.

In addition the consultation was also uploaded onto BeHeard during the same period that the full public consultation was carried out.

Have you obtained the views of relevant stakeholders on the impact of the Function on Individuals with a disability?	Yes
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If so, how did you obtain these views?

Consultation materials were sent to the Birmingham Access Committee, Birmingham Institute of the Deaf and Birmingham Focus on Blindness who were asked to comment on the proposals.

The consultation, which ran between the 1st and 30th September 2016, was available on BeHeard and in local libraries.

We also provided a telephone contact number and email address for those who had any further queries or needed additional support in accessing or reviewing the plans

Is a further action plan required?	No
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3.2.4 Disability - Additional Work

Do you need any more information or to do any more work to complete the assessment?	No
Do you think that the Function has a role in preventing Individuals with a disability being treated differently, in an unfair or inappropriate way, just because of their disability?	No
Do you think that the Function could help foster good relations between persons who share the relevant protected characteristic and persons who do not share it?	Yes
Do you think that the Function will take account of disabilities even if it means treating Individuals with a disability more favourably?	Yes
Do you think that the Function could assist Individuals with a disability to participate more?	Yes
Do you think that the Function could assist in promoting positive attitudes to Individuals with a disability?	Yes

Please explain how.

It will make this protected characteristic group more confident to use the local road network and so make them more visible and able to integrate more with their local community.

3.3 Gender - Assessment Questions

3.3.1 Gender - Relevance

Gender	Relevant
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3.3.2 Gender - Impact

Describe how the Function meets the needs of Men and women?

59% of all casualties in Central South-West Birmingham (Area B2) road traffic collisions (2015) are male. By encouraging and developing a culture of lower speeds, particularly for young male drivers on residential roads, will increase the ability for all drivers to react and thus avoid collisions. One of the main aims of the function is to reduce road traffic collisions. Because of the current statistics, any reduction in road traffic collisions would therefore affect males more than females.

Do you have evidence to support the assessment?	Yes
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Please record the type of evidence and where it is from?

West Midlands Police road traffic collision records over the last 3 years.

You may have evidence from more than one source. If so, does it present a consistent view?	Not applicable
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3.3.3 Gender - Consultation

Have you obtained the views of Men and women on the impact of the Function?	Yes
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If so, how did you obtain these views?

A full public consultation was carried out between 1st September and 30th September 2016. A letter was distributed to local residents inviting them to attend one of the 4 manned exhibitions or one of the number of drop in venues for further information and discussions.

In addition the consultation was also uploaded onto BeHeard during the same period that the full public consultation was carried out.

Have you obtained the views of relevant stakeholders on the impact of the Function on Men and women?	No
If not, why not?	No relevant stakeholders identified
Is a further action plan required?	No

3.3.4 Gender - Additional Work

Do you need any more information or to do any more work to complete the assessment?	No
Do you think that the Function has a role in preventing Men and women being treated differently, in an unfair or inappropriate way, just because of their gender?	No

3.4 Race - Assessment Questions

3.4.1 Race - Relevance

Race	Relevant
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3.4.2 Race - Impact

Describe how the Function meets the needs of Individuals from different ethnic backgrounds?

Parts of the city with a higher proportion of BME people have higher numbers of road traffic collisions. Since the function is designed to reduce road traffic collisions, people living in these parts of the city will benefit more.

Do you have evidence to support the assessment?	Yes
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Please record the type of evidence and where it is from?

Road traffic collision data collected which is analysed from West Midlands Police collision records over the last 3 years.

You may have evidence from more than one source. If so, does it present a consistent view?	Not applicable
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3.4.3 Race - Consultation

Have you obtained the views of Individuals from different ethnic backgrounds on the impact of the Function?	Yes
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If so, how did you obtain these views?

A full public consultation was carried out between 1st September and 30th September 2016. A letter was distributed to local residents inviting them to attend one of the 4 manned exhibitions or one of the drop in venues for further information and discussions.

In addition the consultation was also uploaded onto BeHeard during the same period that the full public consultation was carried out.

Have you obtained the views of relevant stakeholders on the impact of the Function on Individuals from different ethnic backgrounds?	No
If not, why not?	There are no plans to consult relevant stakeholders
Is a further action plan required?	No

3.4.4 Race - Additional Work

Do you need any more information or to do any more work to complete the assessment?	No
Do you think that the Function has a role in preventing Individuals from different ethnic backgrounds being treated differently, in an unfair or inappropriate way, just because of their ethnicity?	Yes

Do you think that the Function could help foster good relations between persons who share the relevant protected characteristic and persons who do not share it?	No
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Please explain how individuals may be impacted.

Parts of the city with a higher proportion of BME people have higher numbers of road traffic collisions. Since the function is designed to reduce road traffic collisions, people living in these parts of the city will benefit more.

3.5 Concluding Statement on Full Assessment

The proposal consists of reducing the speed limit from 30mph to 20mph on most residential roads, in local shopping centres and near to schools on main roads within parts of the wards of Edgbaston, Harborne, Selly Oak and Bournville.

The 20mph area in Birmingham was selected based on a city-wide public and stakeholder consultation which was undertaken on the 20mph policy in Autumn 2013. The results of the consultation were mixed but the selected areas for 20mph had the most support.

The selection criteria for the 20mph area is:

- It had one of the highest levels of public support in the initial consultation.
- It is an area where there are existing cyclists and significant scope to grow that number.
- It is contiguous with other 20mph areas so helps to create a single wider 20mph area.
- It has a relatively high level of accidents based on analysis.

This scheme is part of the Birmingham Cycle Revolution Programme which supports the City Council's policy objectives outlined in the Council Business Plan and Budget 2016+, Road Safety Strategy for Birmingham 2016 and other documents, in particular for 'a strong economy' and 'a healthy happy city'. Birmingham Cycle Revolution also addresses the recommendations of the Transport, Connectivity and Sustainability Overview and Scrutiny Committee (TCS O&S) report, 'Changing Gear, Transforming Urban Movement Through Walking and Cycling in Birmingham'. The schemes also support the objectives of the Birmingham Development Plan (BDP), Birmingham Connected, and the West Midlands Strategic Transport Plan.

The scheme will endeavor to have a positive impact on pedestrians and cyclists as it is perceived that they will feel more confident to move around their local community knowing that traffic in their area should be travelling at a reduced speed.

Monitoring will be carried out prior to the scheme being implemented and for a period of 2 years post completion. These results will be compared to see if there has been a reduction in the number of accidents within the 20mph speed limit area.

A full public consultation was carried out between 1st September and 30th September 2016. A letter was distributed to local residents inviting them to one of the 4 manned exhibitions or visiting one of the drop in venues for further information and discussions.

In addition the consultation was also uploaded onto Beheard during the same period that the full public consultation was carried out. At the end of the consultation period, both the consultation feedback and responses from Beheard were collated and a single evaluation exercise was carried out.

The scheme will have a positive impact on pedestrians and cyclists as they will feel more confident to move around their local community knowing that traffic in their area should be travelling at a reduced speed.

Reducing the speed limit to 20mph will make the alternatives such as walking and cycling safer and more attractive. In addition may encourage modal shift by getting people to think about their trip and how it is undertaken.

It is not expected that this scheme will have any other negative or positive impact on the protected characteristics.

4 Review Date

01/05/17

5 Action Plan

There are no relevant issues, so no action plans are currently required.

Objection No: 1	<p>I wish to object to the (Selly Oak East, Selly Oak) (20 mph speed limit) Order 201. I received notice of this on Friday.</p> <p>As I fed back last year during the consultation, in my opinion, the 20 mph project is a complete waste of time, resources and money. The issue is that the current 30 mph limit is not enforced - so why would it make any difference changing this to 20 mph? Reckless drivers will continue to ignore it.</p> <p>I also note that Fordhouse Lane will remain at 30 mph, where we are regularly overtaken by drivers doing speeds in excess of 40-50 mph. In the current cash-strapped climate, I would suggest that the money would perhaps be better spent on identifying those roads that are used as rally tracks by certain drivers, and installing speed cameras or other traffic calming measures.</p> <p>Finally, I live on Edwin Road, and cannot really see the point of changing the speed limit to 20 mph on this dead-end cul-de-sac comprising of around 8 houses in length. A large sign showing that it is a dead end might be a better idea - this might stop delivery drivers assuming it is a cut-through and screeching to a halt at the end.</p>
Objection No: 2	<p>Before you impose 20 mph on Harborne, why can't you just enforce the National urban limit of 30 mph? If you cannot, why impose a new, lower limit, if not to just collect money in fines???</p> <p>How high is the accident limit of this area??? If low, why is the new limit required? What evidence is there that a 20mph limit would positively affect our accident rate???</p>
Objection No: 3	<p>I wish to object to the above proposal for Yateley Road B15.</p> <p>I have lived in this road for over 15 years. There has never been an accident in that time. It is a wide straight road with good visibility. There are no schools or other sensitive buildings on the road.</p> <p>A reduction to 20 mph will serve no useful purpose and a need for change has not been demonstrated. 30 mph represents an acceptable level of risk as experience has demonstrated.</p> <p>There will always be those who say "if it saves one life it will have been worth it", but in modern society there is a need to balance real risk against the needs of life. Otherwise we will go back to a 4 mph limit and a man with a red flag.</p>
Objection No: 4	<p>I wish to object strongly to the imposed 20mph speed limit in the above area. I would like to know why your organisation has authorised and for what purpose. I can't see any. Driving slowly can be just as dangerous as driving at high speed limits. To be honest I can walk quicker! I cannot see any benefit to this proposed 20mph speed limit and I object strongly about it possibly going ahead.</p>

<p>Objection No: 5</p>	<p>I refer to the order to “consolidate a 20mph speed limit in the Harborne west area”.</p> <p>I herewith record my objection to this proposal on the following grounds:</p> <ol style="list-style-type: none"> 1) The “proven” benefit of such a scheme is doubtful (at best) - and subject to challenge. 2) It will not be enforceable (law enforcement resources are limited and will be allocated to more pressing matters) – undermining the credibility of the proposal. 3) It will undermine the credibility of BCC’s TM department as the majority of motorists will not agree/accept the need for such restrictions and will ,in the main, not comply with them.(As referenced in The Times recently). 4) Recent evidence has shown that the majority of motorists would understand, accept and comply with such speed restrictions in the vicinity of schools (and other similar institutions) but see no sense or justification in a widespread application of such restrictions –especially in areas with few pedestrians evident. Such restrictions in practice therefore do little other than undermine the credibility of the relevant council <p>I therefore request and suggest that you review this proposal with the objective of focusing action around specific areas of vulnerability (such as schools).</p>
<p>Objection No: 6</p>	<p>Thank you for distributing the notice of the proposed imposition of 20mph speed limit on roads around Harborne. Some of the roads in the area are very narrow and crowded with parked cars and travel at anything more than 20mph is not only difficult but also unwise. However, some roads on the edge of the area are wider and have very few parked cars. These include Augustus road, Gillhurst Road, Westfield Road and Woodbourne Road, which are important arteries through the area. It seems to me that imposition of the 20mph speed limit on these roads will cause unnecessary frustration for drivers and lead to more aggressive and risky driving. I ask you please to reconsider the wisdom of the 20mph limit on these roads and to confine the limit to where it is really necessary and beneficial. Gillhurst Road, Woodbourne Road and Augustus Road could then be part of 30mph boundary on the north side of the Harborne village area. I hope you will be able to give serious consideration to my suggestion.</p>
<p>Objection No: 7</p>	<p>I would like to express my opposition to these proposals on the grounds that they are unnecessary and a waste of public money in a time of reduced council spending on more urgent services such as children’s services and provision for the elderly. At busy times of day it is unlikely that traffic can proceed at 10mph let alone 20mph. The increase of street furniture makes it more likely to be ignored. The general standard of public services continues to decline, the poor road surface a danger to motorists and cyclists, rubbish collection not provided for over 4 weeks. Do we really need another level of bureaucracy in this case I believe not.</p>

Objection No: 8	Object to the proposal. Cost local taxpayer a lot of money to implement. Very little effect on drivers. Existing 30mph is not enforced
Objection No: 9	Whether they will be monitored an enforced after introduction. At present the 30mph is not enforced in several of the local roads.
Objection No: 10	I am disappointed Fordhouse lane has not been included.
Objection No: 11	I wish to object in a constructive way. There are times when 20mph is too fast.it is a matter of driving to match the conditions which constantly change. This new order will cause more pollution and I believe frustration in quieter periods.
Objection No: 12	How is LOGICAL OR SATISFACTORY THAT THIS ORDER OF A 20MPH RESTRICTION BE APPLIED TO A MAIN ARTERIAL ROAD-PERSHORE ROAD. I OBJECT TO THE OBOVE ORDER.
Objection No: 13	I write to object to the proposal, under your order number 201 to reduce the speed limit to 20 mph. Drivers will be so engrossed in trying to keep their speed down to 20 mph that they will lose concentration. Please do not do this.
Objection No: 14	20mph limits are a pain, and would not be necessary if 30mph limits were enforced. We are told of budget cuts for important things but there's apparently huge funding for planning, street signs and road painting for this. Your mythbusters states "The first public consultation was overall against the idea but the Council has ignored this" How democratic. Mythbusters also states "It is proposed that the 20mph limit would be enforced in the same way as the existing 30mph limits in the city." 130mph and no custodial sentence! I don't call that enforcement. Please scrap this time wasting polluting scheme now. Thanks I shall tick the box to say I have read your privacy terms: I haven't.
Objection No: 15	Online research reveals that blanket 20mph zones only work if there is public transport. RoSPA is on record as stating that such schemes work best when speeds are already low i.e. when in the mid 20's. Through routes are particularly less likely to see speed reductions.so trying to include the likes of Gillhurst and Augustus Roads in ant such schemes is bound to fail. Rather than unworkable blanket 20mph roll-put I would prefer Birmingham to do likewise. For example I am in favour of traffic calming schemes such as the traffic islands being installed along Linden Road.

Objection No: 16	<p>Object to the proposal.</p> <p>Cost local taxpayer a lot of money to implement.</p> <p>Very little effect on drivers.</p> <p>Existing 30mph is not enforced.</p>
Objection No: 17	<p>I thoroughly support the idea of increasing road safety, I do not believe this proposal will deliver your objectives, hence I am writing to you to object. When you carried out a public consultation regarding a 20mph speed limit, the public rejected the proposition so you have no mandate to bring in these proposals .On what ground do you claim you have the authority to act out against the wishes of the people you serve. The problem in the Edgbaston area is not a 30mph speed limit but excessive parking. Some of the roads you mention are very short cul de sacs, Star Hill, Gildown place, Deeley Close etc. Why do you imagine that there is a speeding problem on roads such as these? You have provided no specific, Edgbaston based data about the problem you are trying to solve using a 20 mph speed limit.</p>
Objection No: 18	<p>While 20mph is understandable on roads close to schools it is totally unnecessary on others, (although 25mph would have been more appropriate) with vehicle braking systems nowadays being a lot more efficient than years ago when 30mph was deemed to be safe speed on urban roads.</p> <p>What will be the cost to the public for the extra road signage and painting?</p>
Objection No: 19	<p>I object strongly to this 20mph.the increased pollution from cars causes more asthma and dirt than the reduced speed helps. Further I have yet to see anyone maintaining this speed limit including buses, cars, police or quite possible yourself. Just ask Open University Portsmouth report on 20mph limit. Technology sustainable future.</p>
Objection No: 20	<p>RIDICULOUS OVER REACTION.IT WOULD BE FAR MORE CONSTRUCTIVE TO TAKE SOME POSITIVE ACTION REGARDING PARKING. ALREADY HAVE TRAFFIC CALMING MEASURES NEAR SCHOOLS. Ridiculous – YOU EITHER CAN'T POSSIBLY DRIVE FAST ON THESE ROADS OR 30MPH WITH TODAYS MODERN BRAKING SYSTEMS IS PERFECTLY REASONABLE.</p> <p>(Roads being referred to – Abbey Road, Antringham Gardens, Augustus Road, Don Close, Eastway , East Pathway, Ellesboro' Road, Euan close, Carless Avenue, Clarence Road, Crosbie Road, Gillhurst Road, Gilmorton Close, Middlemore Drive , Kelmscott Road, Lara Close , Leabon Grove, Margaret Road, Meadow Road ,Oakham Road, Park Edge, Pereira Road , Ravenhurst Road, Regent Road ,Rodman Close ,Rose Road, Serpentine Road , South Street, Station Road ,St Marys Road, Stockdale Place , Strutt Close, The Circle , The Farthings, Vivian Road , Wentworth Gate, Wentworth Park Avenue , Wentworth Road , Westfield Road ,West Pathway & Woodbourne Road)</p>

<p>Objection No: 21</p>	<p>This will cause a large number of road blocks and backup traffic affecting traders, bus timetables and, in many cases slow down the area unnecessarily. During busy periods many of the roads are already moving at less than 20mph so I cannot see how this change would be advantageous.</p> <p>Extra signs will need to be displayed as many visitors will not know these areas are 20mph. I think introducing new signage will be ugly and not be in keeping with the area.</p> <p>Currently around some of the schools there are already 20mph with speed bumps. If you introduce the lower speed limit everywhere people will not differentiate when it comes to the really vulnerable areas e.g. Outside schools or at crossings.</p> <p>I know that if an accident occurs that the reduced speed means more people survive, but I don't believe that Harborne has more accident in these areas. I would also like to know how this new speed limit will be monitored and policed.</p> <p>In other areas that have introduced reduced speed limits there have been an increased number of road rage and tailgating. Locals have complained of incidents of “aggressive tailgating” as impatient motorists grow frustrated behind drivers who are respecting the rules.</p> <p>I am very opposed to this idea and strongly object.</p>
<p>Objection No: 22</p>	<p>We strongly object to the entirety of this proposal and wish to see it withdrawn for the following reasons:</p> <p>The proposal covers all roads in our local area .the implication of this is that the majority of our local journeys such as those to school or work and back will be very limited to this very slow 20mph limit. This will inevitably increase our journey times having a detrimental effect on our family time.</p> <p>The general reduction in the velocity of traffic in this area due to the reduction in the speed limit will inevitably lead to higher emissions and pollution as the efficiency of local traffic vehicles decreases. This has clear implications for all local residents but in particular for the very young, the very old and those already suffering from chronic respiratory conditions. As the country is trying to reduce its CO2 emission and carbon footprint in general, we cannot envisage a worse proposal.</p> <p>Looking through the reasons for the proposal, we cannot accept the validity of any of the reasons specified. Specifically, we would like to know how these proposals preserve the “character of the roads “, especially when said roads will be congested with lower moving traffic emitting more pollutants.</p>
<p>Objection No: 23</p>	<p>I write as a long term resident of Cross Farm Road. I have no objections per se however the imposition of a 20mph speed limit will have no effect whatsoever. Since the opening of the new QE hospital Cross farm road has become a well-known and much used “rat run“ to Avoid congestion between Harborne park road and the roundabout at the junction with Metchley Lane. During rush hour vehicle exceed the 30mph limit and Id venture to say this will continue to do so with the 20mph limit in force.</p>

	The only effective way to prevent this is installing speed bumps along the length of cross farm road.
Objection No: 24	<p>My wife and I formally object to the proposed 20mph zone.</p> <ol style="list-style-type: none"> 1. Manchester city council has scrapped the 20mph limit because it makes no difference to speed or accidents. 2. Slow traffic means more vehicles on the road 3. Safety data shows more accidents in the 20mph areas and fewer in the 30mph ones. 4. Congestion and delay are worse below 20mph .slower traffic means worse fuel economy and worse air quality. 5. Most pedestrians and cyclist injuries occur in busy streets and at speed well under 20mph. 6. Slow maximum 20 mph traffic = extra buses, higher price for taxis, minicabs, home deliveries, goods in shops. 7. I do not believe BCC have demonstrated how this proposed 20mph limit is necessary .I also do not believe there is enough community support for it. 8. The council has not identified a series of accidents in which vehicles were travelling at speeds between 15-20 mph. 9. This blanket 20mph speed limit would be difficult to enforce, and unlikely to be enforced. Enforcement would also be a burden on police and unlikely to be an effective use of their resources. 10. If complied with, the speed limit reduction would have an adverse impact on journey times, putting up cost for bus operations, delivery operations and charges, commuters, taxis and minicabs. 11. The council should propose variable speed limits on some of these roads – near schools or colleges. There are many better ways of improving road safety than this blanket 20mph scheme. 12. Cars are most fuel efficient at 30-35mph.going slowly at 20mph uses much more fuel, causing more emissions.
Objection No: 25	<p>I wish to register a strong objection to this proposed 20mph limit.</p> <p>The national 30mph limit cannot be enforced, so why make a smaller one?</p> <p>These are quiet residential streets, how high is the accident rate > and what part is due to speeding, rather than not signalling turns and poor parking. If accidents are very few and seldom caused by people doing 30mph what justification is there for your proposal.</p> <p>Why is the proposal being made in august when many of those being affected are away on holiday?</p> <p>Is there any evidence of 20mph being enforced anywhere else in England?</p> <p>How much will the signage cost?</p> <p>This could be better spent with traffic lights in a few busy places, the roundabout at Augustus and Hermitage/Westfield for example is dangerous at 5 mph because people turn without signalling.</p>

	Is there any rational proven case for this proposal?
Objection No: 26	This is a good idea and has the potential to avoid possible injury and death; sadly it is a waste of council funding since there is no policing of the policy. The cars still speed down Selly Wood Road in excess of 30mph. Selly Wood Road and surroundings lack signage. The next tranche of roads in Selly Oak South area will mirror the previous area .high expenditure with little if any outcome of pay.
Objection No: 27	<p>To Traffic Manager Mr Kevin Hicks</p> <p>In response to your letter, I wish to object to the proposed order on the following grounds; 1. The current speed limit is 30 MPH on Richmond Hill road which has a sign that lights up nearly every time a vehicle approaches it. Can you please advise me how you intend to legally enforce this new speed limit when you cannot manage the current restrictions</p> <p>2 Your letter has mentioned Mead Rise to have the new speed limit. This is a private road, as far as I know none of the residents have been consulted prior to this notice. Does the council intend to adopt this Road and maintain it?</p> <p>3. Somerset Road and Farquhar Road also have speeds limits of 30 MPH but vehicles exceed this speed on a regular basis, sometimes exceeding 50 MPH.</p> <p>This seems to me to be a complete waste of tax payers money particularly as Birmingham City Council are informing us that they cannot carry out urgent road repairs, i.e. Holes in road surfaces which are a danger not only to pedestrians and also car suspensions.</p> <p>I will be sending a copy of this letter to my local MP</p>
Objection No: 28	<p>20 mph speed limit proposal, Selly Oak South Area, Order 201</p> <p>It was difficult to find the details on the website; search under Selly Park 201, Cotteridge yielded no current results. Anyway, I do have concerns that a 20 mph limit will cause congestion along the Pershore Road bus route. There is already a 20mph limit in Cotteridge.</p>
Objection No: 29	<p>I write to object.</p> <p>The excuse is used of reducing speeds to save lives. I can believe this on much higher speeds but at the speed you're talking about just makes everyone transfixed on monitoring their speed rather than more importantly keeping concentration on the road. I believe all this will create traffic and an increase of pollution and accidents because of loss of concentration due to more speed monitoring.</p>
Objection No: 30	<p>I write to express my opposition to the proposed reduction of speed to 20mph.</p> <p>I believe this to be an unnecessary imposition on drivers. I believe that it would be preferable to simply enforce the current 30mph limit.</p>

	I believe that the 20mph would be too slow and induce drowsiness on drivers thus creating a hazard.
Objection No: 31	<p>We wish to appeal against the inclusion of the following roads from this order –</p> <p>First Avenue - B29 7NS Second Avenue – B29 7HD Third Avenue – B29 7EX Fourth Avenue – B29 7EU Sir Johns Road – B29 7ER & B29 7EP</p> <p>These are all cul-de-sacs, but other, shorter cul-de-sacs such as Seymour close and Hubert Croft have been included in the order. Having made enquires for the reason for the exclusion of these roads from the order we understand that:- “The guidance form Department For Transport states that minimum length for a speed limit not be less than 600m. Other cul-de-sacs of a similar length have been included because they come off a proposed/existing 20mph road and are in accordance with tis criteria. However First, Second, Third and Fourth Avenues and Sir Johns all come off Pershore Road, which is to remain at 30mph and the roads are not longer than 600m.” This is put as guidance, which we believe to be advisory not mandatory, so discretion can be exercised. We believe it should be in these roads for the following reasons:-</p> <ol style="list-style-type: none"> 1. Each road may be less than 600m in length, but as there is no junction between Fourth Avenue and Sir Johns Road, it is a continuous stretch from the junction of Third and Fourth Avenues to the end of Sir Johns Road, and we estimate this exceeds 600m. 2. All are residential streets with a number of families with small children living there. Regrettably this does not lead to all drivers limiting their speed and many drive in excess of 20mph which we believe presents a hazard. 3. In fact the potential speeding is greater in these avenues which are largely straight than some included in the order, such as Seymour Close which is not only shorter but has a steep hill and a bend of almost 90 degrees, factors which serve as natural limiters to speed. <p>Addendum to the letter:-</p> <p>Additional points have been made by people who signed the letter as follows:-</p> <ol style="list-style-type: none"> 1. All these avenues are frequently used by cyclists and in fact as the attached Birmingham City Council Cycling route map shows First Avenue is a signed cycle route and Second Avenue as advisory one. 2. Looking at the Department of Transport circular 01/2013 “Setting Local Speed Limits” under Key Points in Section 3 it appears that the 600m advisory minimum length refers to it being part of a longer rather than covering the entire road as we are suggesting should be agreed here. Elsewhere in this circular it is clear that the 600m minimum length is not immutable and also emphasis is given to residential areas as particularly benefitting from 20mph speed limits.

Objection No: 32	<p>While there are undoubted benefits of 20mph zones particularly on side roads, I do question their suitability on major roads and therefore I propose an objection on the following grounds:</p> <p>On parts of Pershore Road, Stirchley a 20 mph zone has been operational for some time. Unfortunately, not all vehicles observe the lower limit while others do. I personally find this speed imbalance actually creates additional hazard to me as a pedestrian, as I find it more difficult to judge the speed of approaching vehicles when attempting to cross the road. Therefore, in my view, the normal 30 mph speed limit would in this respect be safer</p>
Objection No: 33	<p>I wish to object strongly to this blanket imposition of a 20 mph limit on nearly every road in the area. The original consultation on 20mph speed limits in 2013 suggested that about 80% of the city's roads would have 20mph limits. The people of Birmingham rejected that proposal in a public consultation. The council's reaction has been, not just to ignore the result of the consultation exercise, but to add even more roads to the list of 20mph limits. And these are the roads where a 20mph limit is least justifiable: through routes with limited pedestrian/vehicle conflict. In this area this includes Bournbrook Road, Dogpool Lane and Dads Lane, Edgbaston Park Road (except by the university east gate), Somerset Road, Wellington Road, and others. I want to protest as strongly as I possibly can, about the City Council showing such contempt for the view of its citizens. Your mythbusters document is the misleading and indeed worrying documents I have ever seen produced by a public body. Here are some examples: 1. It rejects the result of the consultation exercise because people who travel by car were "over-represented" in the responses. It gives no reasons for this statement, only a bald assertion. Birmingham people who drive cars also use public transport (I do). There is no indication that you are aware of this or that you considered it before making the assertion that car drivers were over-represented. 2. The reasons given for ignoring the people and carrying on with this programme and indeed increasing it, are inadequate. By your own statement a blanket 20mph limit in Portsmouth reduced accidents by *%. That means by every 100 accidents when there were 30mph limits, there are still 92 accidents when the limits have been cut to 20mph. It is a small reduction in accidents for a huge change in speed limits. What other alternatives, such signage, were considered and rejected? In Warrington you say the casualties have reduced from 9.4 per year to 8. I'm not sure if that fall would even be statistically significant. The use of general accident figures is of limited statistical validity anyway, as they do not explain why accidents happen. The statistics you quote - and I assume you have quoted ones most favourable to your proposals - are far too slight to justify so draconian a policy. 3. The documents refer to the environmental benefits of 20mph limits without indicating what they are? I know of no study which suggests that cars travelling at 20mph are significantly less polluting overall than cars travelling at 30mph. The statement is again an unjustified assertion. 4. The document refers to 20mph limits playing their part in "active travel and healthy lifestyles". this suggests that 20mph limits are being enforced in order to get people out of the cars and presumably instead to walk or cycle. I do not believe the council has any ethical justification for treating its citizens this way. There is no suggestion in the document why it does? Without that I submit that this is the worst kind of social engineering. 5. The document suggests that a reason for enforcing 20mph limits is because "in general there were significant</p>

	<p>levels of support from key stakeholders and elected members". That appears to say that 20mph limits will be imposed, despite the public's rejection of them, because councillors and officers want them. The council knows best, whatever people think. The Kerslake report on Birmingham City Council described the council in one of its major findings as having a "silo based and council knows best culture". It would be difficult to find a better example of such a council than this sentence and indeed the whole "mythbusters" report. I am not opposed to 20mph limits on many roads in this city, indeed most of the roads in the 2013 report. The limits are welcome in areas such as Bournbrook and the very narrow roads on Lodge Hill where a higher speed is dangerous. There are many dangerous locations near schools. But this blanket policy makes it impossible for any motorist in the city to drive without breaking the law. It is easiest to explain this by looking at Moseley, where you introduced these limits some while ago. The 20mph limits include, as one obvious example, the whole of Russell Road, moor Green Lane and Queensbridge Road. Of course there are schools at the South end of Queensbridge Road. But elsewhere these roads are major through routes, wide, straight, with relatively low pedestrian conflict and without significant dangers. The roads are obviously fit for 30mph and people drive at that speed. It is very difficult indeed in those circumstances to keep to a 20mph limit.</p>
Objection No: 34	<p>I do think this is extremely complex. I've put my thoughts onto the note attached. On balance I think "if it ain't broke, don't fix it" and so let's stay as we are. I'm also very keen on lots of cameras and prosecutions for careless and dangerous driving, rather than speed which I see as very often a technicality. Here, I confess to a permanent grievance against being fined for driving on the 2-lane A45 (Coventry to Stansted Airport) at 06.25 on a February morning at 62 mph in a 50 mph limit. I'd seen 4 vehicles move in the 5 or so miles travelled since I set out from Coventry and not a single pedestrian.</p>
Objection No: 35	<p>I am writing to raise an objection to the proposal to impose 20mph speed limits in much of the area I live in, and have lived for 17 years. The speed limit of 30mph isn't the issue with the traffic. The problem people drive at 40mph plus or pull off high speed dangerous driving at night. What you will end up with is People ignoring the 20mph. People getting penalised at what is an appropriate speed for the roads/area Doesn't fix the issue, as those not obeying 30mph will not obey 20mph People watching the speedometer or police and not watching the road I would really rather money be spent on traffic calming measures down pineapple.</p>

Objection No: 36	I object to the proposed Order as being completely unnecessary and overkill. 20mph is a ridiculously low speed for drivers to maintain and increases fuel consumption and thereby causes greater pollution. A road such as Gillhurst Road as one example is fully capable of accommodating 30mph as would be many of the roads on your list. Speed bumps should also be removed, they cause pollution as vehicles decelerate to go over them and then accelerate back to their previous speed. It is an absolutely typical example of something not thought-through which applies in equal measure to the 20mph speed limit.
Objection No: 37	I acknowledge the receipt of your letter dated 10th July 2017 with dismay. I have also visited web site but there seems to be no detailed evidence given for these proposals. The proposals seem to cast a blanket across a vast area of almost 90 roads regardless of whether they are quiet narrow cul de sacs, busy roads or even bus routes. Yes, there are regrettable fatalities two of which have been local but in both cases the Highway Code was allegedly not being observed. Surely it is more important to control excessive speed, to allow motorists to drive at an appropriate speed, rather than reduce the rate of all movement so drastically. Are your colleagues aware that cyclists can and often do travel far faster and at certainly rather more than 20mph, that Corporation three wheel lawn mowers can manage 20mph, and even man on two legs (some) can exceed this speed? But there seems to be an ever growing obsession with slowness. Possible consequences of a reduced speed limit. 1. Journey times are likely to be even longer. 2. More road rage. Recently I drove along a 20mph stretch of road keeping to the limit and in fact two motorists angrily overtook me. Both vehicles must have exceeded even 30mph to complete their manoeuvres. 3. Greater inefficiency on fuel and engines with more wear and tear on brakes and tyres. 4. More pollution and carcinogenic emissions. The irony is that vehicles' braking and engineering throughout have become so much improved since the present speed limit of 30mph was first introduced. 6. Drivers will avoid these areas like a plague. I frequently visit Devon, but always avoid Plymouth. 7. Given the choice I would not purchase a house in 20mph zone. Does this suggest house prices may fall? 8. It is certainly difficult constantly to maintain precise speed of no more than 20mph and it would surely be safer to watch the road rather than constantly checking the speedometer and having to brake. 9. It would be helpful to have speed control fitted, but my cruise control does not operate in low gears. 10. Surely it should not be the case of enforcing all motorists to drive ever slower, but instead to prevent few drivers from speeding excessively. 11. Increasing rates of tax to raise more revenue can sometimes have the converse result. I do wonder therefore whether the proposed measures to bring in 20mph limits will have the opposite effect and will be detrimental. 12. Finally I should like to make a comparison with Germany. There the default speed limit is 50 km/h (31mph) in towns, 100 km/h (62 mph) outside towns, 130km/h (81mph) on highways and unrestricted speed on many stretches on Autobhans. Without doubt their average speeds are generally much higher. Does this lead to a different mind-set. Is not our productivity about 20% lower - even than France? Germany has an annual surplus of about £200 billion. In contrast the UK has an annual deficit currently of £71.7 billion and a ballooning National Debt of £1.7 trillion (£12 zeros). The single most important factor is our economy. The present trend is unsustainable. I do not want our economy to fall even lower depths and I

	do not want cars to move around in pelotons like lines of slow moving sloths.
Objection No: 38	I object to the proposed introduction of 20mph speed limits in the Edgbaston South West and Edgbaston Traffic Regulation Order 201. The whole scheme is expensive and unnecessary. Recent press reports would appear to show that in other areas of the country where 20mph speed limits have been introduced very few vehicles obey the limit. It would be sensible to delay wasting money on this scheme until the results of other such schemes have been fully evaluated. If it is deemed essential to spend money then ways should be found to enforce the existing speed limits effectively.
Objection No: 39	I wish to object to the proposed traffic order 201 because it does not include Metchley Lane. This busy road links Selly Oak to Harborne and Edgbaston as well as Queen Elizabeth Hospital, the Women's Hospital, the Barberry and the University. There is a high volume of pedestrian traffic because so many people work, study, visit or receive treatment at these institutions yet are unable to park there. Metchley Lane is one of only two roads linked to A&E via Mendhelson Way so receives a high volume of ambulances on emergency calls. It also contains ten bus stops which serve three different routes: 48, 224 and 647. Many hospital staff, patients and visitors park on the roads surrounding the Queen Elizabeth Hospital and the Women's Hospital, including Metchley Lane. This narrows the road and reduces visibility; Other roads near the hospitals such as Hintlesham Avenue and St Mary's Road now have very restricted parking thus increasing the pressure on Metchley Lane. The junction between Metchley Lane and Mindelkson was recently the site of a road traffic accident which resulted in a pedestrian fatality. Paul Graham, from Selly Oak, suffered catastrophic head injuries after he was hit by a vehicle driven at speed on Metchley Lane in June this year. Further parking restrictions and a 20mph speed limit are desperately needed on Metchley Lane to prevent further fatalities.
Objection No: 40	Why change the limit now? Have accidents drastically increased? This might just increase the chance of people getting a speeding fine for no benefit to accident rates.
Objection No: 41	I am in favour of the proposals. I am disappointed, however, that there is no strategy to introduce targeted traffic calming measures in areas where it is locally well-known that even a 30-mph limit is very regularly exceeded (e.g. Augustus Road & Gillhurst Road in my immediate vicinity). While there could well be an argument that the behaviour of such drivers will be mitigated (with the resultant speeds being reduced overall), this assumes that the relative exceeding of the limit is determined by the limit in place. I would be interested to know if there is any evidence on this matter. Otherwise, I'm sure all residents will be able to point to roads, for which there will be speeds regularly in excess of 40 mph.

Objection No: 42	<p>I am a resident of Wheeleys road and I do agree with the proposal as we see too many cars driving over from Wheeleys Lane at high speeds.</p> <p>I think however that you also need to re-consider the existing arrangement on the traffic lights on Wheeleys lane when crossing over the A4540 (Lee Bank Middleway/Islington Row Middleway) towards Wheeleys road.</p> <p>Current arrangement is two right lanes to turn right into Islington Row Middleway towards Five Ways Island and left lane to either turn left into Lee Bank Middleway or cross over into Wheeleys Road.</p> <p>This is regularly creating long queues on the left lane (going all the way to Bath row) and empty lanes on the other two. As a consequence many people tend to stay on the middle lane and speed over across to Wheeleys Road cutting over vehicles which are crossing from the left lane.</p> <p>This aggressive and dangerous behaviour should be stopped as the vehicles doing it put everybody else in danger and already enter Wheeleys Road at a much higher speed than the proposed 20 miles. Unless this is sorted there will be a serious accident.</p>
Objection No: 43	<p>I understand the need in some areas for 20 Mph speed limits, particularly in areas where schools are present. However, in my brief experience of driving in Birmingham roads it is clear that despite 20mph speed restrictions 90% of drivers fail to observe this. Drivers are also increasingly frustrated when someone is driving 20mph and then perform a more dangerous act of overtaking. This has happened to me multiple times.</p> <p>I feel people would be more willing to observe the limit if it wasn't rolled out over so extensively, but rather limited to the areas of road that actually require it. I struggle to see through the general justifications given on the website makes this speed limit appropriate for all the roads mentioned. I worry that this is due to laziness and a lack of awareness of what is required on the roads, most of which function perfectly would function perfectly well at 30mph according to the justifications given.</p> <p>If there have been accidents in the past 5 years or any other risk factors that have been identified on these roads, I would be more than happy to support 20mph speed limits in those areas. Please don't make newcomers to Birmingham roads even more unsure of the social protocols in driving. I can assure you from my experience that it took a bit of getting used to.</p>
Objection No: 44	<p>I think this is crazy and totally unnecessary. Also will be very difficult to enforce. Even now with 30mph limits cars drive at 35-40mph, and sometimes if you are sticking to the speed limit you feel intimidated by cars behind you. Driving at 30mph with due care and attention should be safe enough. What needs to be done is enforcement of current laws e.g. not using mobile phone while driving, and ensuring that drivers adhere to highway code etc. e.g. indicating when turning off, not suddenly doing U-turns etc.</p> <p>Also there needs to be consistency through the city - why is this proposed for just 4 wards?? Also there are some dual carriageways with</p>

	40mph limits and some with 30mph limits when common sense would suggest that the actual speed limit is not right
Objection No: 45	<p>Experience of 20mph areas in other parts of Birmingham shows they are not working: very few drivers drive at 20mph in them. For those of us who do, it forces the driver to look frequently at the speedometer and take his eyes off the road, because it is an unnaturally slow speed for the quality of the road. Seeing a speed limit being so widely flouted with no consequence may cause people to lose respect for the concept of speed limits altogether and drive at dangerous speeds on other roads.</p> <p>What I have noticed is that more people now drive at "only" 30mph (say) in the 20mph zones, whereas previously they may have driven at closer to 40mph. That is a safety improvement. However, it is better achieved by properly enforcing the existing 30mph speed limits than by imposing an unnecessarily low speed limit which distracts careful drivers and erodes public confidence in speed limits and those who set them.</p>
Objection No: 46	Most drivers slow down when the conditions on any particular Rd make it unsafe to go too fast. The minority who go at unsafe speeds will still do so. Installing 20mph signs will be both costly and clutter streets up with even more signs.
Objection No: 47	I strongly object to the introduction of 20mph zones except in very limited cases such as outside schools or in narrow residential streets.
Objection No: 48	<p>Aaaaagghhh! 20mph limits are a great idea in high risk areas but blanket roll outs across the city are unenforceable and ignored. Frequently I encounter drivers ignoring these, including the West Midlands Police and Ambulance vehicles.</p> <p>Better road management of heavily used routes, creating safe passage for all including motored vehicles would be better. Keeping these clear of obstructions and well maintained is a basic task which is not kept up with.</p>
Objection No: 49	Dacer Close should be 20 MPH limit its part of NCN5.
Objection No: 50	<p>Ludicrous proposal. What another waste of tax-payers hard earned money! A totally needless project that will infuriate most honest, hardworking and respectful drivers.</p> <p>I can't remember witnessing any speeding traffic or irregular size vehicles (other than council contractors!) on these beautiful roads. They are lovely to drive around, cycle around and walk around as they are. Why on Earth put in more road signs & speed bumps to change the aesthetics of the areas for the worse?</p> <p>If people choose to speed (which I do not condone in the slightest) they will. Hideous, obstructive additions to the road surfaces will not stop this.</p> <p>Why doesn't the council spend the money on re-surfacing any roads in need of repair and spend the money on getting my rubbish and</p>

	<p>recycling collected?</p> <p>I fully object to these proposals and will do so in writing.</p>
Objection No: 51	<p>Reducing the speed limit on residential roads is a good idea: on many of the roads affected by the proposed traffic regulation order 20 mph is the maximum speed a responsible driver would drive anyway.</p> <p>However, I think the proposed order is too wide-ranging. Some of the roads can be quite safely driven on at 30 mph: Examples include Augustus Road, Gillhurst Road, Ravenhurst Road and Woodbourne Road.</p> <p>I suspect that motorists will be more likely to comply with the new speed limit if it is imposed only on roads that justify it. The new 20 mph limit on roads in the city centre is universally ignored: partly, I suspect, because it is has been too liberally applied to roads that do not justify such a low speed limit. Motorists make their own judgement as to what is a safe speed and imposing an absurdly low speed limit won't change this. Also you should consider 25 mph as a compromise.</p>
Objection No: 52	<p>The proposal seems to be very poorly considered.</p> <p>There appears to be no extensive evidence to support any of the assertions.</p> <p>1 what evidence is there that there is an environmental benefit to having engines idling or running in lower gears (necessary to run at 20Mph).</p> <p>2 how many accidents have there been in the last 12 months where the 30mph speed limit was being observed. Note most cars do not observe 30mph; this will simply make criminals of the rest of us as we are overtaken by bicycles (who will still ignore the rules of the road, traffic lights etc.).</p> <p>3 what will the economic impact be of reducing the speed limit, presumably you have evaluated the number of cars that use these roads annually and the distance that they cover. Were it (and it is probably a lot more) say 1.5m cars a year (5000 a day) travelling an average of 3 miles each, then 4.5m miles will be travelled taking 9 million minutes at 30mph versus 13.5million minutes at 20mph.</p> <p>Ergo a further 4.5 million minutes of non-productive time, which at minimum wage would equate to c £200k.</p> <p>Whilst i can see the benefit of reducing speeds in the narrow over parked roads where 2 cars cannot reasonably pass, doing so on arterial roads like Augustus Road and Norfolk Road seems to be going too far and casting the economy unnecessarily.</p> <p>The key point should be enforcement of the existing rules at 30mph not punishing those who abide by this because so many do not.</p> <p>In summary. the environmental case is probably dubious, the road safety case probably also fails due to the actual speeds that people drive at not the speed limit and there is an economic impact probably in the millions of further slowing the wheels of industry.</p> <p>Also Bikes travel at well above 20mph but less commonly above 30mph, how do you propose to deal with the riders who will be at even</p>

	greater risk given that they will now be overtaking cars.
Objection No: 53	<p>This will add significantly to all journey times and cause a build-up of traffic.</p> <p>What evidence do you have to demonstrate this will reduce rather than increase pollution given that every journey will take longer to complete?</p> <p>I object to this proposal. I would rather the money be spent on improving the flow of traffic light sequencing to reduce the stop start frequency at traffic lights thereby speeding up journeys and reducing pollution.</p>
Objection No: 54	<p>I am supportive of the proposed 20 mph scheme across Edgbaston.</p> <p>There is however one road that is marked to remain at 30mph which I recommend should be reduced to 20 mph. That is Church Road. There is no logic for it remaining at 30 mph if Edgbaston Park Road which has no residential accommodation for over 800 yards is reduced to 20 mph.</p> <p>Church Road is site to two residential care homes Audley St George's Place and Sunrise of Edgbaston, University Halls of Residence, and also a very busy independent primary school, Hallfield School, which has more than 550 pupils many of whom like my children walk to school.</p> <p>There is also a Belisha Crossing at the entrance to the school, which is regularly missed by drivers coming out of town who accelerate at that point in what may be the first free movement of traffic flow for some time.</p> <p>Given the use of the road by young children and elderly people it is entirely appropriate that the speed limit be reduced to 20 mph on Church Road.</p>
Objection No: 55	<p>If this 20 mph is brought into force into what are residential areas for the most part, it will mean that many vehicles will have to travel in third gear as 20 mph is not feasible mechanically in fourth/top gear in most cars etc. This will mean less fuel efficiency, a great increase in cost and pollution and longer, more expensive journey times. I notice that some bus routes have also been included. Have bus companies been consulted?</p> <p>How is it to be enforced? By costly speed humps which can damage car suspensions, by speed cameras, at what cost, or by extra costly patrols.</p> <p>I agree with the very idealistic reasons but please let a little sanity and common sense prevail and only introduce the limit in pedestrian heavy areas and as now by schools.</p>
Objection No: 56	20 mph limits are not working and won't work in the future. When driving down Pershore Road Stirchley at 05:45 hrs who is this ridiculous

	<p>artificial speed limit trying to protect given that there is little traffic on the road and even fewer pedestrians about. Business and schools in the area are closed at this time of day. At 20mph I have to use 2nd gear to avoid breaking the limit- not very fuel efficient or environment friendly. Why can I no longer drive to the conditions (like emergency vehicles can) but within a 30mph limit?</p> <p>I received my notice about these proposals on the same day it was announced that violent crime had increased by in excess of 10%, police levels are at the lowest level for many years and forget it if you have your car or bike stolen as 90% of these cases are closed as unresolved. The police don't have the resources to enforce this or many other driving regulations hence why the standard of driving overall today is so poor. Do you really expect those motorists who are violators of current speed limits and other traffic regulations to comply given we have so many in the west midlands who apparently don't know what a bus lane is or understand the meaning of double yellow lines. Greater compliance with these new speed limits could be achieved with a more sensible approach i.e. like in Dundee where the roads have a dual speed limit (20mph when lights flashing 30mph at other times) Having seen this in action where 20mph applies in the morning when kids are going to school, lunchtime and in the evening when they are going home this far more sensible approach makes sense to motorists who comply. 20mph blanket speed limits 24/7 are not sensible and motorists have trouble understanding why they have to drive at 20mph past a closed school at 03:30hrs on a Sunday morning.</p>
Objection No: 57	<p>I am happy with a 20 mph speed limit though I doubt if it can be enforced. Most drivers behave responsibly but a few feel that laws to do apply to them and will continue to speed. Motor cyclists are particularly prone to speeding. I think speed should be part of a driver's judgement - empty roads at midnight are perfectly safe if this is exceeded. It is also difficult to keep to 20 when coming down a hill. My main objection to the city's traffic calming schemes is the continuing use of speed bumps which cause drivers to weave around to avoid them, and with the present number of parked cars on the roads this causes frustration, damage to cars and yet again more drivers in the middle of the road. It has also been shown that constant braking and acceleration over bumps causes more pollution and fuel wastage, and results in an uncomfortable driving experience, especially for children. Of great use would be a SLOW sign painted on Raddlebarn Road as it approaches Oak Tree Lane just before the junction with Centurion Way [formerly Hestia Drive]. Drivers often seem unaware of the increased use of this junction now that houses have been built.</p>
Objection No: 58	<p>Someone once again with too much time on their hands thinking this is a bright idea. A massive round of applause to all pencil pushers within the council. Maybe spend more time on sorting out removal of household rubbish than limits like this. Utter joke! As if anyone will take any notice.</p>
Objection No: 59	<p>I was somewhat surprised when I received the order 201 notice to reduce traffic speeds to 20mph in Edgbaston, principally because without enforcement I can't see what the point of it is. The current limit of 30mph isn't monitored, and is routinely exceeded by significant</p>

	<p>margins by late night "boy racers", inconsiderate taxi drivers and impatient commuters (when they get the chance).</p> <p>If the intention is to address pollution and emissions, I suggest that the focus is shifted to getting old vehicles (particularly taxis) off the roads, cracking down on engine idling, restricting heavy good vehicles and promoting electric/hybrid vehicles/cycling / improving Birmingham's shoddy buses.</p> <p>Instead of tokenistically reducing the limit to a speed that I can comfortably surpass on my road bike -which simultaneously undermines the credibility of speed limits- the council should focus on policing the current, perfectly adequate limit of 30mph and coming up with better ways of reducing and managing the heavy traffic on some of the roads proposed.</p> <p>All this proposal will do is make the council look impotent and foolish. As it currently stands, it will achieve nothing else.</p>
Objection No: 60	<p>You use the phrase 'Following the full Public Consultation in September 2016' but following that consultation the public did not support your proposals. On what basis do you presume to proceed with these plans as you have no mandate from the public you are meant to serve.</p> <p>In addition, as any resident in the area will tell you had you thought to ask, the problem in Edgbaston is parking. This issue is more hazardous to the population than a 30mph speed limit and this proposal does nothing to alleviate the dangers to pedestrians etc. by thoughtless and excessive parking in the area.</p> <p>This is a waste of time and money and is merely virtue signalling by the council. I would prefer that my money is spent on effective actions.</p>
Objection No: 61	<p>Please explain what problem is the proposal aimed at addressing?</p> <p>How much will it cost? (Could the budget be better spent, e.g. on road repair?)</p> <p>How will it be enforced? (Given that the 30mph isn't enforced)</p> <p>When is the proposal planned?</p>
Objection No: 62	<p>Regarding the proposed 20mph restrictions on said roads. Whilst I agree that some of the roads could benefit from such a restriction, (e.g. Outside primary schools), I do not think that this proposal is necessary or indeed practical in most of the streets mentioned in the proposal. Firstly, Harborne is already seriously congested during rush hours and the proposed restrictions would simply add to the congestion. Secondly, it is really very hard to restrict cars to driving at 20mph without the use of speed bumps on all of the proposed roads. I have been practising driving at this speed and it is really very difficult indeed - unless the roadway is constructed by either parked cars, (such as the circle or Lonsdale road), or by speed bumps, (e.g. Station road), in which case the driver naturally uses common sense and drives slower anyway.</p> <p>Can it be that this proposal is being used as a means of generating income for the council by imposing speeding fines on said roads? If this is the case I think it is an insidious stealth tax and wholeheartedly disagree with the proposal.</p>

	I hereby post my objection to this proposal.
Objection No:63	<p>I should like to point out anomalies and ask for changes, reflecting a few of the roads I am familiar with.</p> <p>It is incongruous and Pavenham Drive and Odell Place are both shown with 30 mph limits. These are both short, dead-end, residential roads with a lot of on-street parking reducing the carriageway to single vehicle width and (for Pavenham Drive) several 90° bends. There is much more justification for both of these to be 20 mph zones than many of the other roads on the plans.</p> <p>Conversely, Woodbourne Road, Augustus Road and Wellington Road are very wide, largely straight roads with little on-street parking, but largely still wide enough to accommodate two-way traffic even when there is parking. Although they are residential, most properties are set well back on smaller side roads. I argue these could well remain at 30 mph limits with no detriment to safety.</p> <p>Finally, I note that Vincent Drive and Pritchatt's Road are indicated as 30 mph on one map, and 20 mph on another.</p>
Objection No: 64	<p>1. What and where is your evidence to support your reasons that the 20 mph</p> <p>will achieve any improvement? Has anyone gathered any firm data???</p> <p>2. What will be the cost for implementing these changes to the current system???</p>
Objection No: 65	<p>Unfortunately these proposals do not appear to do anything to tackle the most dangerous (and also intimidating and off putting) part of cycling between Harborne and the City Centre which is cycling up Harborne Road between Westfield Rd and Augustus Road. For that reason it is hard to support this proposal to spend Birmingham Cycle Revolution Money.</p> <p>It is good to see the reduction in speed to 20mph of many local residential roads, however this ignores the fact that most cyclists wish to access the city centre. From most parts of Harborne the only sensible route to do this is along the Harborne Road. Which outside of the high street will remain at 30mph? Between Westfield Rd and Augustus Road the speed limit is to remain at 30mph - given how dangerous and intimidating this junction is this should be reduced to 20mph or proper cycling infrastructure should be provided. Without this any benefits to cycling of the 20mph limits will be lost completely as a dangerous junction (far worse than any residential road) prevents access to the city centre. Given that this is being paid for by cycling funding this should be considered.</p> <p>I fail to see why Cartland Road is being included.</p> <p>I agree that Harrison Gr and similar short cul-de-sacs should not be included as it provides no benefit as traffic travels at a low speed on these roads anyway so it would result in additional cost for no benefit.</p> <p>The junction of Harborne High St / Harborne Park road/ Lordswood Rd/ War Lane should be included as it is one of the most dangerous</p>

	roads in the city for cyclists - especially given that this is being paid for by cycling funding.
Objection No:66	<p>The proposed reduction in the speed limit to 20 MPH affects almost all roads in our local area. I strongly object to the entirety of this proposal and wish to see it withdrawn for the following reasons:</p> <ol style="list-style-type: none"> 1. The proposal covers all local roads in our area. The implication of this is that the majority of our local journeys such as those to school or work and back will be limited to this very slow 20 MPH limit. This will inevitably increase our journey times having a detrimental effect on our family time. 2. The general reduction in the velocity of traffic in this area due to the reduction in the speed limit will inevitably lead to higher emissions and pollution as the efficiency of local traffic vehicles decreases. This has clear implications for all local residents but in particular for the very young, the very old and for those already suffering from chronic respiratory conditions. As the country is trying to reduce its CO2 emission and carbon footprint in general, I cannot envisage a worse proposal. 3. Looking through the reasons for the proposal, I cannot accept the validity of any of the proposals. Specifically, I would like to know how these proposals preserve the "character of the roads", especially when said roads will be congested with slower moving traffic, emitting more pollutants.
Objection No:67	<p>The proposed reduction in the speed limit to 20 MPH affects almost all roads in our local area. I strongly object to the entirety of this proposal and wish to see it withdrawn for the following reasons:</p> <ol style="list-style-type: none"> 1. The proposal covers all local roads in our area. The implication of this is that the majority of our local journeys such as those to school or work and back will be limited to this very slow 20 MPH limit. This will inevitably increase our journey times having a detrimental effect on our family time. 2. The general reduction in the velocity of traffic in this area due to the reduction in the speed limit will inevitably lead to higher emissions and pollution as the efficiency of local traffic vehicles decreases. This has clear implications for all local residents but in particular for the very young, the very old and for those already suffering from chronic respiratory conditions. As the country is trying to reduce its CO2 emission and carbon footprint in general, I cannot envisage a worse proposal. 3. Looking through the reasons for the proposal, I cannot accept the validity of any of the proposals. Specifically, I would like to know how these proposals preserve the "character of the roads", especially when said roads will be congested with slower moving traffic emitting more pollutants.
Objection No:68	<p>While I support the introduction of 20mph zones in general terms, I am concerned that traffic management measures in some roads such as ours - Gordon Rd, Harborne, could create problems. You will be aware of the severe parking problems in this area and despite a</p>

	majority of residents asking for a residents parking scheme a few years ago the council ignored this because your consultants felt a simple majority was not good enough and higher support was needed. Since then matters have become much worse. If any measures taken to support the 20mph scheme lead to even a couple of parking spaces being lost it will cause problems. The volume of parked cars in most cases has a natural effect on reducing traffic as you will know has been shown by some road safety studies, eg on school gate parking. I am concerned that the roundels suggested may add to problems in this area unless they are used sparingly and in a way that will not create a new hazard rather than prevent one.
Objection No:69	I am interested to know how this may or may not be affected by the Governments recent announcement to invest £255m pounds to help address environmental concerns. Part of this money, I believe, is aimed at reducing the number of traffic calming measures (sleeping policeman, etc), which it would seem are contributory factors in polluting the environment and could be seen to be at odds with what is being proposed in this order. Thank you.
Objection No:70	I am writing to object to the proposed 20mph order as it affects Arthur Road, Edgbaston Park Road, Church Road, Wellington Road and Wheelleys Road. The bulk of these roads are bus routes and all are major thoroughfares. They are wide and heavily used and it is unreasonable to expect traffic to travel along them at 20 mph all hours of the day. In my view these limits are unlikely to be observed and will tend to reduce public acceptance of speed limits generally. If observed they will increase journey times, congestion and thus pollution.
Objection No:71	I'm concerned that much of the feedback from the previous consultation (appendix F to the full business case, see https://birmingham.cmis.uk.com/birmingham/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/9727/Committee/10/Default.aspx) does not seem to have been appropriately addressed. In several instances, the consultation feedback replies to concerns about particular points of the consultation by stating a lack of evidence either way. For example (all of these are quotes from the consultation response): "As the Pilot schemes in Birmingham are still being implemented, the only data available is from other cities who have implemented similar schemes. The 20mph Area B2 is the last of the 4 pilot schemes. All pilot schemes will be surveyed during the monitoring period. Following the monitoring period, an assessment will be carried out to determine if any further measures are required." "Studies have so far not conclusively proven either a positive or negative effect on the environment." "Some analysis has been carried out on road traffic collisions, but the data is often inconclusive." In particular, many of the environmental aspects are addressed by a statement that lower speed limits will encourage people to use forms of transport other than driving (and even despite this, it's apparently inconclusive whether there will be an environmental improvement or

	<p>not!). This statement does not strike me as being obviously true, and more evidence is likely needed in favour of it; it'll be a large waste of money if it turns out that the scheme has a major negative impact on the environment, and thus has to be reversed. Having only inconclusive evidence as to whether a scheme will be problematic or not should not be taken as an argument to go forward with it; rather, it should be taken as an argument that more evidence is needed before deciding whether to go forward with it.</p> <p>I'm also generally concerned about the statements made with respect to congestion. The consultation response assumes that most journeys will be made mostly along 30mph routes (quoting: "20mph will mainly apply on residential street and in selected locations on main roads. Most main roads will keep their existing 30mph or 40mph speed limits, so once drivers leave residential areas and join the main road network there should be no impact on journey times.") However, there are two problems with this. One is that the network of 30mph roads (allegedly "main roads") has several dead ends, e.g. on Pershore Road near Dogpool Lane; this makes it physically impossible to route journeys mostly along 30mph roads if they want to use the main roads in question (and note that Pershore Road is an A road, the A441, and therefore a major road by definition). The other problem is that the number of roads designated as "main roads" is so small that they are unlikely to be able to keep up with the traffic used; under these plans, almost all traffic from Northfield, to Cotteridge (and anywhere in between) is apparently expected to use the A38 Bristol Road (directly or in conjunction with the A4040 Linden Road) to reach the city centre, and forcing all the traffic from a fairly wide area onto a single route is likely to cause that route to become highly congested (even though the speed limit of the A38 itself is not being reduced below 30mph). This amount of congestion would rather negate the benefits expected from the scheme (e.g. by increasing environmental damage / air pollution along the A38). None of this seems to have been taken into account in the consultation response.</p> <p>It seems likely (not just based on theory, but based on the actual reactions of some drivers I know to existing 20mph limit areas combined with congestion on major routes) that once the A38 (and the other roads whose speed limits remain at 30mph) becomes overloaded, drivers will look for alternative routes through the 20mph area; and with a speed limit reduction on all the semi-major roads (e.g. Dogpool Lane, Pershore Road) which would normally handle the traffic, there's no particular speed-limit-based reason to favour one road over another when the major routes are overloaded. As such, spreading a 20mph limit too widely is likely to increase the number of journeys on existing 20mph roads; drivers currently typically prefer to use 30mph roads, but with such a radical reduction in the number of such routes existing, the existing 20mph roads will become more attractive to drivers due to having less competition. This acts directly against the goals of the scheme, as it's likely to lead to more cars, not less, in residential areas.</p> <p>I also have some specific concerns relating to cyclists. The consultation response says that the 20mph speed limit will also apply to cyclists (quoting, "The speed limit applies to all road users and cyclists are expected to adhere to the speed limit."). This would be very surprising; the vast majority of speed limits in the UK do not apply to cyclists (e.g. the national speed limit does not apply to cyclists). Speed limits are normally made under the Road Traffic Regulation Act 1984, part VI, subsection 84(1); the Traffic Regulation Order being consulted on is</p>
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	<p>presumably being made by this mechanism (the consultation mentions the Road Traffic Regulation Act, although not the specific subsection being used). However, such speed limits only apply to "the driving of motor vehicles on that road at a speed exceeding [...]", and bicycles are not motor vehicles. It is legally possible for a council to make a speed limit order that also applies to bicycles, but it would have to be done via a different mechanism, and would need to explicitly specify things like signage, the offence being committed, the penalty for the offence, and the like; none of the "default" rules for speeding offences apply to cyclists. It's important to ensure that a traffic regulation order is not based on incorrect data! The apparent ignorance of the law related to speed limits on the part of the people evaluating the consultation does not bode well for the creation of speed limits that will be enforceable (and there seems to be a consensus among all parties that effective enforcement of the speed limits will be needed for this scheme to be a success).</p> <p>It's also to be noted that even if new speed limits did apply to cyclists, cyclists would find them hard to comply with; most bicycles do not have a speedometer, and in general, a typical cyclist would not know whether they were exceeding 20mph or not. (Typical cycling speeds are below but fairly close to 20mph on average, and thus capable of exceeding 20mph at peaks.)</p> <p>Finally, I'd like to express my concerns with the way in which the previous consultation on this subject was treated. Normally, the aim with this sort of project is to determine whether a change is a good idea or not; neutral evidence is treated as neutral, evidence in favour of the change being helpful is required, evidence against the change being helpful is seen as seriously concerning and mitigated if possible (halting the project if impossible, unless the evidence against is really minor). This specific project, instead, seems to have started with a conclusion already in mind, and run with the goal of reaching that conclusion; evidence in favour is treated as evidence in favour, inconclusive/neutral evidence is also treated as evidence in favour, and evidence against is argued with. Please don't treat this consultation the same way.</p>
<p>Objection No: 72</p>	<p>Your previous consultations have discarded comments and opinions of drivers and anyone who did not agree with your proposals. You have admitted to this in your own PR stating drivers were over-represented. As an ex statistical analysis officer I'm aware discounting driver's opinions gives a false positive and your consultations are based on fraud. You continue to railroad through unpopular policies and plans to the disadvantage of the people who pay your salaries and to whom you are responsible.</p> <p>As a driver I have seen pedestrian attitude towards road deteriorate to the point of anarchy since your unpopular 20mph zones, speed bumps and traffic calming measures continue to be rolled out. Pedestrians push children into the road to force traffic to stop, walk into the road, walk across pedestrian crossings without checking if it is safe to do so and generally treat the road like an extension of the pavement. By reinforcing the mentality that pedestrian = good and driver = bad you are reinforcing the dangerous image that pedestrians are not responsible for their own safety.</p> <p>You have not provided any statistical evidence that shows, overwhelmingly, RTAs and pedestrian mortality has reduced as a result of the introduction of these 20mph zones. The evidence you have provided is statistically insignificant.</p>

	<p>In any event the 20mph zones are not being adhered to as you are unable to enforce them and it now seems even promote them through additional road signage. Rarely do I see any driver adhering to the 20mph limits except for around schools. In fact, they have appeared to made drivers even more aggressive and use roads they normally would not. The introduction of these zones has made not one jot of difference to traffic speed and has actually made side roads even more dangerous.</p> <p>20mph zones are good for small towns and villages. This is the second city in Britain and you are bringing it to a halt. I'm disabled and I HAVE NO CHOICE BUT TO DRIVE. i CAN'T USE PUBLIC TRANSPORT BECAUSE IT'S RUBBISH AND TOO EXPENSIVE AND A 20 MINUTE AND VERY PAINFUL WALK TO USE IT. You have made my journey to work three times as long as it used to be as a result of road narrowing, ridiculous amounts of traffic lights (Longbridge Lane), 20mph zones, speed bumps and everything else you have done to force drivers onto the two main arteries in the city which you have then narrowed and traffic lighted and junctioned to the point of permanent gridlock. Why do you think drivers use side roads in the first place? Because the main roads are car parks for 4 hours of the day thanks to your ridiculous policies. Are you deliberately trying to bring this city to its knees because you're doing a very good job of it? The Longbridge 'town centre' is already an unmitigated disaster because of your anti driver policies. I live in Longbridge and even I don't go there because of the ridiculous amount of traffic lights you've installed with even more to come.</p> <p>You've now made 80% of my journey a 20mph drive because I can't use the main roads because they're gridlocked. Now you're about to make the remaining 20% of it a 20mph zone. Should I sue you for forcing me out of work because I can't get there in a reasonable time? Do you think 1 hour 10 minutes is a reasonable drive time for a 6 mile journey? Do you think it's reasonable I'll have to get up another 20 minutes earlier and get home even later when I suffer from permanent and total exhaustion, rheumatoid arthritis, osteoarthritis and meniere's disease? Is it right I should leave the house at 0730 to travel 6 miles to arrive by 0900? Would you want a disabled member of your family to go through that and get to work and home in absolute agony because they've been balancing on the clutch or gas pedal the entire journey?</p> <p>Your policies are discriminatory and a complete waste of public money. Instead of spending money on stupid 20mph zones you should be spending it on the autistic children you're just about to decommission services for. You're a disgrace.</p>
Objection No: 73	No objection to the 20mph speed limit. However, I want to register opposition to any form of speed control measures, such as speed bumps or traffic calming measures. They are completely unnecessary.
Objection No: 74	<p>I am writing to you in regard to Order 201, the proposal to lower the speed limit to 20 mph in the Harborne east area.</p> <p>As a resident of the Whetstone Close block of flats off Farquhar Road, I have significant doubt as to the efficacy of the proposed plan. While the roads in this area are residential, they are wide and allow to cars to pass even with cars parked.</p> <p>My experience throughout Birmingham is that there has been a policy of lowering speed limits without adequate means of enforcement,</p>

	<p>meaning that it becomes little more than a signposting exercise, with the minority of drivers that follow the speed limits, being harassed on the roads.</p> <p>Additionally, I believe there is some doubt on the efficacy of the 20 mph speed limits. In Islington where 20 mph limits were introduced the average driver speed dropped from 28 mph to 27 mph. A 1mph speed decrease was also found when Brighton introduced their 20 mph speed limits. I would argue this is an insufficient reward for the cost of additional signposting [1]. After the expansion of 20 mph speed limits in Manchester, the ‘amount of accidents experienced in 20mph zones has not fallen as quickly as initially hoped’. And over the 5-year period of expansion, accidents involving cyclists have dropped by 42 % across Manchester but in areas where 20 mph speed limits were installed the figure only dropped by 12-16 %. It has instead been proposed that the remaining budget be allocated to traffic calming measures [2][3].</p> <p>I would further argue that evidence shows that without additional traffic calming measures or speed enforcement it is unlikely to have the desired effect. They are the speed limit that is the least adhered to, with statistics from the Department for Transport show more than 80 % of drivers ignore 20 mph speed limits [4]. While I accept that a vehicle travelling at 20 mph is less likely to cause a fatality, this is only true if the vehicles are actually travelling at the posted speed.</p> <p>I would argue based on the evidence I have given you thus far, and with sources suggesting that the cost of implementing a 20 mph zone such as this, being around £10,000 in Coventry Council, I would argue that this measure will be both costly and ineffective [5]. I believe it would be more effective to impose traffic calming measures near schools rather than using a blanket limit that will not be respected.</p> <p>As a resident of this area, I very much hope that you will reconsider the proposed expansion of the 20 mph zone. In the words of the president of the AA, Edmund King, widespread 20mph restrictions ‘inspire little respect’ [2].</p> <p>Thank you very much for your time, and I am looking forward to seeing the outcome of this consultation.</p> <p>[1] Birch, H (2015) Do 20mph speed limits really work? The Guardian [online]. Available from: https://www.theguardian.com/cities/2015/may/29/do-20mph-speed-limits-actually-work-london-brighton</p> <p>[2] RoadSafetyGB (2017) Report recommends pause on Manchester’s 20mph scheme. Road Safety GB [online]. Available from: http://www.roadsafetygb.org.uk/news/5623.html</p> <p>[3] Williams, J (2017) Roll-out of 20mph limits halted - because it made almost no difference to drivers' speed. Manchester Evening News [online]. Available from: http://www.manchestereveningnews.co.uk/news/greater-manchester-news/20mph-speed-limit-manchester-stopped-12706663</p> <p>[4] Swanson, I (2017) Rethink urged as 8 in 10 motorists ignore 20mph limits. Edinburgh Evening News [online]. Available from: http://www.edinburghnews.scotsman.com/news/transport/rethink-urged-as-8-in-10-motorists-ignore-20mph-limits-1-4494039</p> <p>[5] Gilbert, S (2016) Drive to make Coventry 20mph city continues despite evidence lowering speed limits is ineffective. Coventry Telegraph</p>
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	[online]. Available from: http://www.coventrytelegraph.net/news/coventry-news/drive-make-coventry-20mph-city-11542152
Objection No: 75	<p>I support the 20 MPH policy for the City but I have some reservations about the level of compliance by drivers. The signage of the highways concerned is inadequate and needs to receive significant enhancement.</p> <ol style="list-style-type: none"> 1. I suggest that could be 20mph signs at regular measured intervals, say every 30 metres. 2. Another thing that needs to be considered is the initial signage at the commencement of a 20MPH zone. I am of the opinion that these signs need to be readily visible to drivers of standard size cars. The present signs where I live are the correct height for goods vehicles but may not be recognised by drivers of smaller vehicles. <p>This is a particular issue at the junction of Linden Road and Oak Tree Lane in Bournville / Selly Oak when travelling towards Selly Oak. This junction is a left hand turn hairpin bend from Linden Road into Oak Tree Lane which requires great care by drivers of all vehicles to the extent that they are unlikely to see the 20MPH signs as they concentrate on the turn they are making.</p> <ol style="list-style-type: none"> 3. Finally, and this might not be acceptable, why not have a simple colour code band on all highway lamp posts to designate the speed limit nationally ? <p>Perhaps red - 70 MPH, orange - 50 MPH, yellow - 40 MPH, blue - 30 MPH and green 20 MPH.</p>
Objection No: 76	<p>I feel this Order is a waste of public money and that the money is better served elsewhere. The speed restriction will just be a nuisance to residents most of whom, if not all, abide with the current speed limit. There have barely been incidents of people speeding. Granted you do get the odd few, but you get that everywhere, this does not mean you post 20mph restrictions everywhere. Some of the Closes listed are so small that you will not reach 20mph, which begs the question as to why you feel it is necessary to waste public money.</p> <p>Further to this, how will this be monitored and enforced? There appears to be very little thought process behind this scheme other than Birmingham City Council trying to justify their expenses.</p> <p>What i also find annoying is that the letter posted briefing the Order states 'Any person wishing to object to the proposed Order should write to..' There is nothing to state you can email or complete a survey online. I feel this is a tactic by Birmingham City Council to deter people from objecting.</p>

<p>Objection No: 77</p>	<p>Speeding, bad driving and bad parking are endemic in this part of Birmingham and our police have told us at consultations that they do not have the resources to address the problems systematically and effectively. Also they have confirmed that they will not be taking any actions to enforce 20 MPH limits when the new zones are introduced.</p> <p>Without enforcement, it will become the norm for the new lower blanket limit to be universally ignored. Using 20MPH limits in special areas close to schools and hospitals seems to have some effect now but this will be diluted as these areas will no longer stand out.</p> <p>The speed differential between cars which do obey the new limits and speeders who ignore the limits now and will continue to ignore the new limits will increase. There will be yet more dangerous overtaking and 'road rage' incidents.</p> <p>The consultation documentation includes a Cabinet Report dated 17th March 2014. This includes the stated intention in Section 5.8 to assess the effect of a pilot with a 'Monitoring & Evaluation Report' that can be assessed before pressing on with full implementation. I have not been able to find any such report. Without this report showing that the pilot has been effective we should not proceed; the checks promised may even show that the changes introduce new or increased risks; we do not know.</p> <p>Rather than waste so much on ineffective headline grabbing, would it not be better to spend the money addressing specific known problems and dangers such as problems outside schools and traffic congestion and dangers due to bad and inconsiderate parking? This would deliver real benefits.</p>
<p>Objection No: 78</p>	<p>I live on Elmdon Road it already has the 20mph limit on it. It just does not work. It is totally ignored and the average speed on the road is probably around 35mph. Some cars go a lot faster. It also has the speed bumps; again these do not work as the cars swerve to avoid them. This actually causes erratic driving in-between bumps or between path and bump. This is actually quite scary if you are walking on the path and a vehicle swerves towards you. The speed bumps also cause the road to be much noisier as heavy traffic such as skip lorries drive over them and slam down the other side.</p> <p>I like the idea of 20mph as I'd feel a lot safer walking around and having my children walking to school etc. But it just does not work. I would prefer enforcement cameras to speed bumps.</p>
<p>Objection No: 79</p>	<p>20 mph is fine near schools on operational days. 20 mph cannot be policed and leads to frustration for the citizens going about their normal business.</p> <p>Causes more pollution and the law abiding drivers penalised.</p> <p>Speeders still speed and this is not the answer. Just a sticking plaster.</p> <p>Other countries seem to manage by sensible speed limits along with slower near a school.</p> <p>I drive late at night, madness slowing to 20 mph no one about, no kids no pedestrians, slows my journey without good reason</p> <p>The police do not keep to 20 with the excuse of pursuing drivers.</p>

	<p>Not done for safety but for cash for the coffers. Think again before turning Birmingham in to no go areas??</p>
Objection No: 80	<p>20mph speed restrictions on Wellington Road and surrounding roads Whilst I welcome the introduction of a 20mph speed limit as a positive move in trying to reduce the movement of traffic on Wellington Road and surrounding roads, it does leave a number issues unresolved.</p> <ol style="list-style-type: none"> 1. Foremost is the fact that this speed limit is unlikely to be policed, and therefore enforced, effectively. Police numbers are such that they would be unable to spend the time required to enforce it. 2. Traffic calming measures may have some effect, but too frequently they can be easily by-passed – witness areas where ‘speed cushions’ have been introduced, which cars simply then drive over with the wheels spanning either side of the cushion. 3. Wellington Road is a long, wide, straight road culminating at its western end by Priory School. It has long been a concern that traffic passing in front of the school, from both directions, travels too fast. In addition, traffic travelling up Wellington Road from Bristol Road approaches the entrances/exits to the school round a blind bend, thus increasing the risk of an accident involving a pupil, parent, or member of staff leaving the school by either exit. The introduction of the 20mph is unlikely, of itself, to reduce that risk. 4. I would suggest, therefore, that it would be appropriate, as part of the introduction of a 20mph speed limit, to create a 20mph School Zone in the immediate vicinity of Priory School. This would then, of its nature, require speed-calming measures to be installed in the roads within the zone. The Road Traffic Regulation Act (Amendment) Order 1999 gave Highway Authorities the ability to introduce a zone without the need to apply for further permission for this. It could, therefore, be introduced at the same time as the 20mph speed limit. I would urge the Council to seriously consider this option, for the sake of all those attending the school, but particularly for the safety of the pupils, many of who are very young, and may not have the road awareness that older pupils and adults will have.
Objection No: 81	<p>I wish to submit this response regarding the proposed 20mph, and have been asked to submit this response on behalf of residents on Pineapple road, between Cartland Road and Vicarage Road.</p> <p>While we support the introduction of the 20mph speed limit, this section of road has geometric features which encourage speed, specifically it is wide and straight.</p> <p>In 2012 the existing speed humps were removed, and replaced with speed cushions. We understand this removal of the speed humps, and replacement with cushions, was done at the request of a local councillor. Unfortunately this has had the effect of dramatically increasing the speed along the road. We have subsequently been trying to rectify this, and in early 2017 had a traffic calming scheme at the pineapple road / Cartland road junction, to reduce accidents caused by this speed. As part of the evidence for this scheme we had ATC’s record the speed along Pineapple road. This week long data demonstrated that 30% of vehicles exceeded the speed limit, with a maximum speed</p>

	<p>recorded of 71mph.</p> <p>Clearly if the geometric layout of the road encourages a third of vehicles to travel over the speed limit, many at twice the speed, the change in speed limit will do little to reduce the speed on this street.</p> <p>We would therefore like further evidence to be collected of the speed after the speed limit change, and should it be found that the speeding continues to be excessive, we would like the physical speed reduction measures be returned to Pineapple Road. This could be reinstating the speed humps, as well as other further measures.</p> <p>In addition, once the speed limit is reduced across the area, we would like to know how some targeted enforcement and education will be actioned, as we feel that pineapple road between Cartland Road and Vicarage Road will be a key area to enforce, due to the current design of the road encouraging speed.</p>
Objection No: 82	<p>I don't support a 20 mph speed limit in wide areas such as this. 20mph is not necessary, except in areas of particular needs, such as near schools or hospitals.</p>
Objection No: 83	<p>I am disappointed that the council intends to press on with universal 20mph speed limits when it admits that 58% of the citizens consulted were against it. Surely, it would be more likely to be observed if the limit were only to be imposed near schools, an aspect endorsed by 90% of respondents? The council claim that there will be benefits in reducing pollution. In my car I have to drive in a low gear to maintain a steady 20mph so I am causing more, not less pollution. In roads where 30mph is safe, but 20mph is imposed, my experience is that I am constantly being overtaken. Most drivers will drive according to the prevailing conditions. The irresponsible will not obey limits unless there are cameras to impose them. My judgment is that the council should not waste money on all the 20mph signage, but restrict it to schools areas. If the existing 30mph limit was observed then there would be a reduction in accidents. In my opinion it would be more effective to invest in more average speed cameras in appropriate locations and also use cameras to prosecute red light jumpers, which is in my observation is by far the most frequent location for accidents.</p>

Objection No: 84	<p>Please see the Lordswood Road, Harborne TRO Objection Consideration Public Report, dated 24 March 2016 of the Acting Strategic Director, Place.</p> <p>This Public Report states on page 12, that the council will include the section of Lordswood Road, from the roundabout at Lordswood Road / War Lane to the roundabout Lordswood Road / Court Oak Road in the 20mph limit Area B2 scheme.</p> <p>I therefore request that the Public Report is adhered to and the 20 mph Area B2 is delivered as stated in that objections report, as committed by the council. That the proposed TRO for Edgbaston South-West, Edgbaston 20 mph speed limit Order 201 is amended to include this section of Lordswood Road, as committed by the council in the Public Report.</p>
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Subject	Literature Review: Local Air Quality and 20mph Limits	Project Name 20mph Limit Air Quality Impacts
Attention	Kieran Boyle	
From	Mark Chapman Technical Director (Air Quality)	
Date	08 December 2017	
Copies to	Birmingham City Council – Rajpreet Mander	

1. Introduction

Birmingham City Council (BCC) are proposing to implement reductions in speed limits to 20 miles per hour (mph) imposed by signs and roundels at strategic locations throughout the city. It is assumed that vehicles will drive at a constant speed throughout the 20 mph areas resulting in a reduced speed without the effects caused by braking and acceleration that can be associated with alternative speed calming measures. Concerns have been raised regarding air quality due to an anticipated increase in emissions and pollution caused by vehicles using lower gears.

Jacobs have been commissioned by BCC to investigate the potential effects on local air quality from implementing 20 mph traffic management measures. The investigation is limited to a high-level review of readily available publications and reports, and emission calculation tools available from Defra.

Traffic management schemes are typically implemented for the purpose of reducing congestion or accidents. Whereas environmental considerations (such as impacts on air quality) are typically secondary to the primary purpose of traffic management; they are more frequently required to be reviewed as part of approving Traffic Regulations Orders (TROs).

While the effectiveness of a scheme and appropriateness of the measures depend upon its primary objective, there is an optimism that speed reductions will give rise to better environmental conditions. There is no straight forward relationship between speed and pollutant concentrations however, and the relationship depends on a number of local factors; including:

- Location of the scheme (urban or rural area, free flowing or congested)
- Fleet mix

2. Approach

A high-level literature review was undertaken of readily available publications and reports to investigate what studies have been undertaken that consider the impacts of 20 mph traffic management measures on air quality.

The available literature was found to fall into one of two main categories of study:

1. Technical
2. Non-Technical

A summary of the findings of the literature review are presented under these headings.

It is important to note that while the studies referenced in this Technical Note may seem similar, direct comparisons should not be drawn without the full understanding of the technical details behind each study; and this Technical Note has made no attempt to draw comparisons of studies undertaken.

Consideration has also been made using Defra's Emissions Factors Toolkit (v8) which provides speed-based emission rates for nitrogen oxides (NO_x) and particulate matter (PM₁₀); two pollutants primarily associated with vehicle exhaust.

2.1 Technical

A number of UK studies have been published that investigate the impact of various traffic management measures on vehicle emissions. In order to determine the impact of such measures (including 20mph zones) on exhaust emissions, it is important to understand the complex relationships between traffic characteristics, vehicle operation and rates of emission. Factors that are directly affected by traffic calming measures, such as speed and acceleration, have been studied most; whereas other factors, such as engine type, exhaust treatments and vehicle weight, being more difficult to assess, are less well documented.

Boulter & Webster (1997)ⁱ undertook a literature review which included details of:

- measures employed to calm traffic
- changes in driver behaviour imposed by traffic calming schemes
- factors affecting emissions from road vehicles in the context of traffic calming
- case studies of the impact of traffic calming schemes on vehicle emissions
- damage to public service vehicles caused by traffic calming measures.

Their review concluded there was limited agreement on the effects of traffic calming on vehicle emissions. Area-wide studies suggested decreases in NO_x emissions as a result of introducing traffic calming measures; however, these same studies were less conclusive in terms of changes in emissions of carbon monoxide (CO) and hydrocarbons (HC).

Studies of the effects of traffic calming based on single sections of road produced varied results. Some studies showed decreases in NO_x emissions; whereas others showed increases. While the review could not identify why this was the case, nor why discrepancies arose between the 'single road' and 'area-wide' studies; 'single road' studies did show a consistent increase in fuel consumption.

In 2001, Boulter et al¹ developed their 1997 investigations and published a further paper examining the effects of different traffic calming measures on vehicle exhaust emissions of passenger cars. The paper concluded that traffic calming measures clearly increase emissions of some pollutants from passenger cars. Statistical tests were performed to examine the differences between the impacts of nine schemes that were investigated on emissions.

This paper identified that, where more severe traffic calming measures were implemented, the following also occurred:

- greatest speed reductions
- the greatest accident savings
- some of the largest increases in emissions

The paper did comment however that on urban traffic calming measures which had been mainly introduced on residential roads, i.e. with low traffic flows, despite leading to increased emissions per vehicle it was unlikely that such increases would result in the creation of 'poor air quality'. This statement was however caveated, to acknowledge the effect of increased emissions where air quality was already poor, such as where Air Quality Management Areas (AQMA) were concerned.

2.2 Non-Technical

A small number of qualitative reports on the subject of the effects of traffic calming measures on air pollution were also reviewed, mainly undertaken/published by local authorities or local government organisations. These studies indicated mixed views over the effects of traffic calming measures on air pollution.

A recent publication by ROSPA (2017)ⁱⁱ which looked at casualty reduction and the implementation of traffic measures, made reference to studies undertaken by local authorities and Transport for London. The conclusions from studies in Walesⁱⁱⁱ indicated that a default speed of 20 mph could reduce casualties, at worst not lead to a direct change in air pollution and indirectly, encourage modal change and therefore reduction in air pollution across a wider-area. This conclusion was not however supported by any evidence.

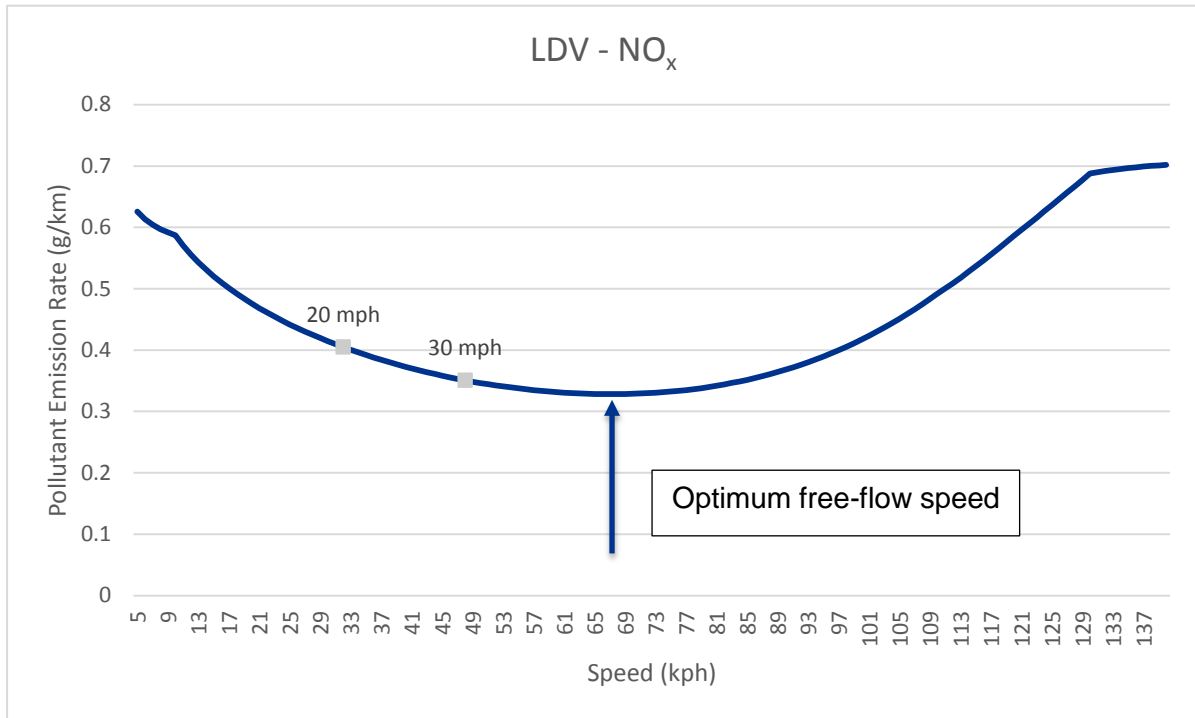
Bristol City Council commissioned a study, which concluded that the introduction of 20mph traffic management measures was associated with negligible changes in emissions. However, it is recognised that uncertainties exist within the processes of emissions estimation and dispersion modelling, and that conclusions should not be taken as precise representations of the impact of the scheme.

3. Free-Flow Speed/Emission Curves

Defra's Emissions Factors Toolkit (v8) provides speed-based emissions rates for NO_x and PM₁₀ for a number of vehicle classes. Emission curves for Light Duty Vehicles (LDV) and Heavy Duty Vehicles (HDV) were calculated and used to describe the difference in emissions rates expected for vehicles travelling in free-flow conditions at 30 and 20 mph. The results of the calculations are presented in Figures and Tables below.

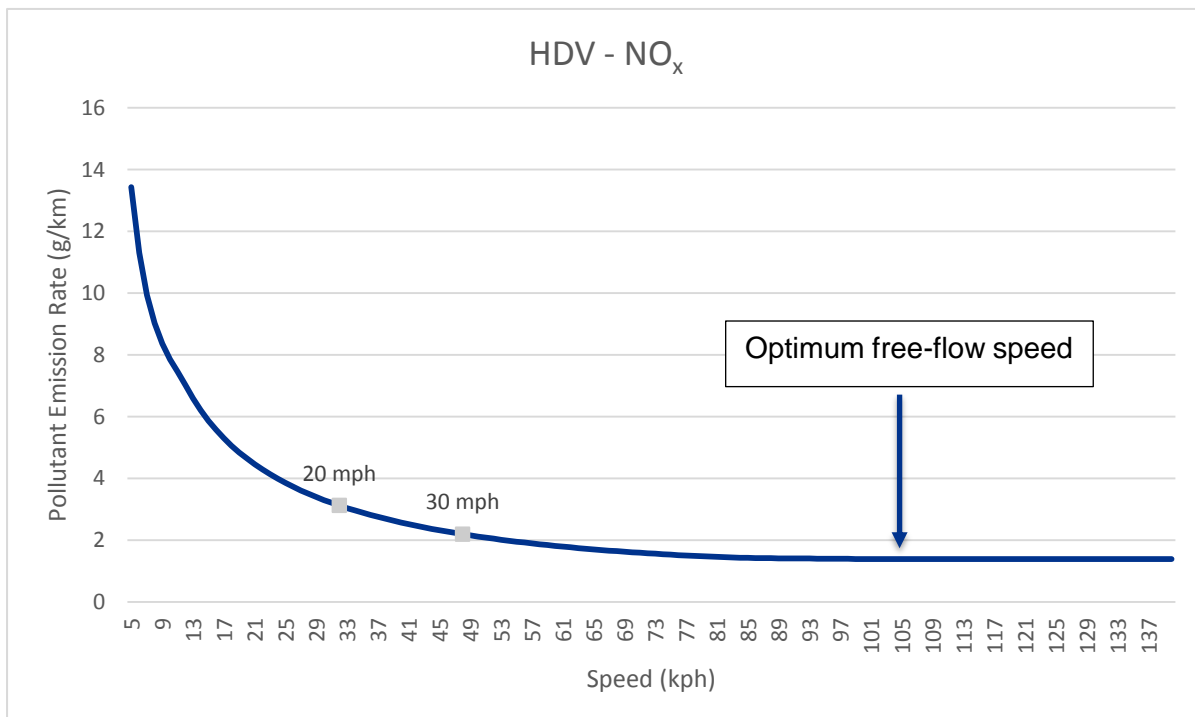
¹ TRL Report482: Boulter et al, 2001 – The impacts of traffic calming measures on vehicle exhaust emissions.

Figure 3.1 : LDV NO_x Emission Rate Speed Curve



For LDVs, lowest free-flow emission rates of NO_x occur at speeds of around 67 kph or 42 mph on urban roads.

Figure 3.2 : HDV NO_x Emission Rate Speed Curve



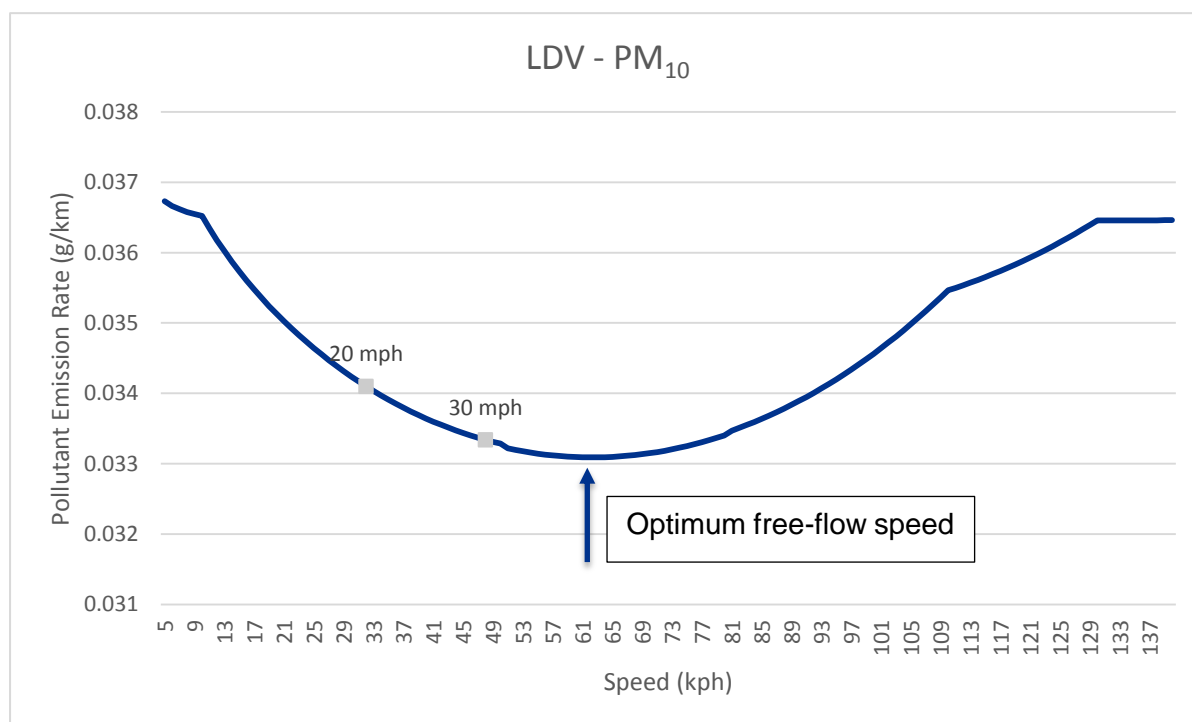
For HDVs, lowest free-flow emission rates of NO_x occur at speeds of around 105 kph or 65 mph on urban roads.

Table 3.1 : NO_x Emission Rates at 30 and 20 mph

NO _x (g/km)	30 mph	20 mph	% Increase
LDV	0.35075	0.40500	15
HDV	2.18919	3.11803	42

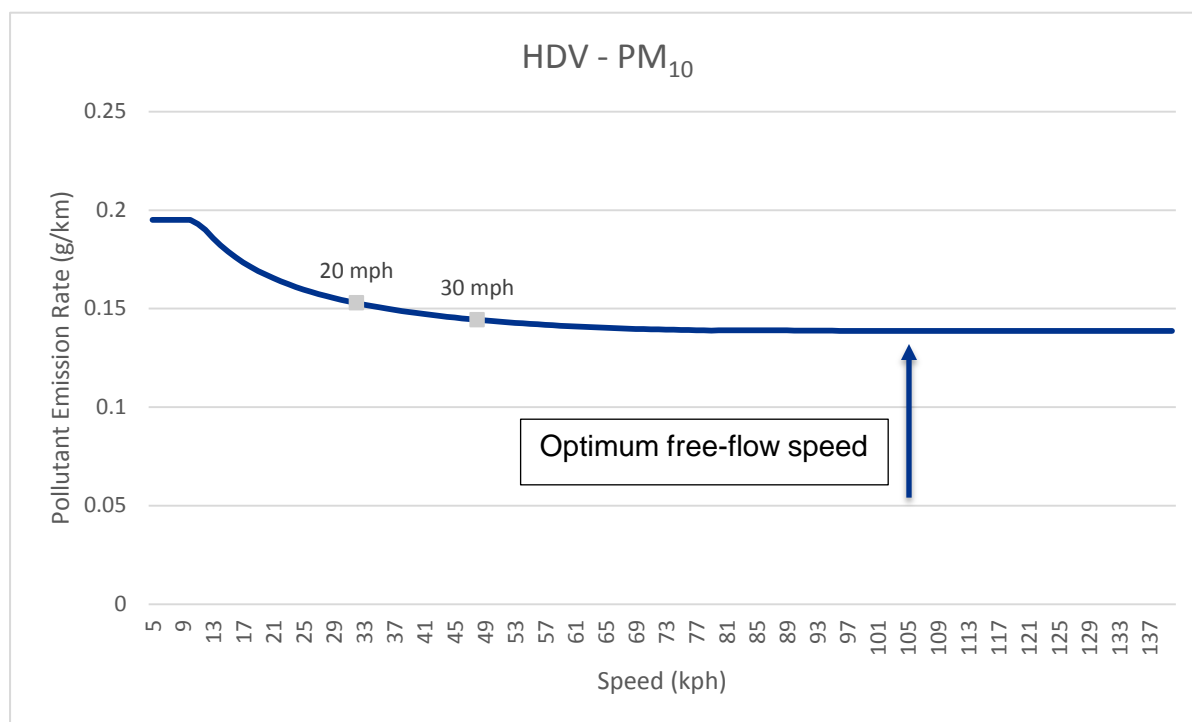
Free-flow emission rates for NO_x are calculated to increase by 15% for LDVs and 42% for HDVs between 30 mph and 20 mph.

Figure 3.3 : LDV PM₁₀ Emission Rate Speed Curve



For LDVs, lowest free-flow emission rates of PM₁₀ occur at speeds of around 62 kph or 39 mph on urban roads.

Figure 3.4 : HDV PM₁₀ Emission Rate Speed Curve



For HDVs, lowest free-flow emission rates of PM₁₀ occur at speeds of around 105 kph or 65 mph on urban roads.

Table 3.2 : PM₁₀ Emission Rates at 30 and 20 mph

PM ₁₀ (g/km)	30 mph	20 mph	% Increase
LDV	0.03334	0.03410	2
HDV	0.14437	0.15286	6

Free-flow emission rates for PM₁₀ are calculated to increase by 2% for LDVs and 6% for HDVs between 30 mph and 20 mph.

4. Instantaneous Emissions Modelling

The Transport and Environmental Analysis Group, Centre for Transport Studies, and Imperial College London undertook an evaluation of the estimated impacts on vehicle emissions of a 20 mph speed restriction in central London in 2013.

The evaluation considered that while average speed models may suggest that a lower speed limit in urban areas may result in higher pollutant emissions, the stop-start nature of traffic may mean that such a method may not be suitable and that further investigation was required.

They used an instantaneous emissions model to estimate pollutant emissions for eight 30 mph and eight 20 mph urban drive-cycles and found a greater range of speeds were observed on 30 mph routes compared to 20 mph routes and a larger proportion of time was spent accelerating and decelerating on 30 mph routes than 20mph routes.

They also found there to be no relationship between average speed and speed limit on residential streets.

They concluded that emissions of NO_x were seen to be higher over 20 mph drive-cycles for petrol cars, but were and generally lower for diesel cars. Given the higher contribution of diesel vehicles to emissions of NO_x, this was considered significant. They also concluded that it would be incorrect to assume a 20 mph speed restrictions would be detrimental to ambient local air quality, as the effects on vehicle emissions are mixed.

Defra, in their 2017 UK Plan for tackling roadside nitrogen dioxide concentrations - Technical Report also state that vehicle testing typically finds that drive-cycles with lower average speeds produce lower NO_x emissions. However, this is subject to significant uncertainty and many confounding variables, including typical driving dynamics, the extent of acceleration, weather conditions, and others.

They conclude however, that overall, there is reasonable cause to expect [a lower average speed] intervention to reduce emissions in some areas.

5. Summary of Evidence

Driver behaviour, the type of calming measure and number of measures are all factors that influence speeds, patterns of driving and also route selection.

Where traffic flows are low, such as on residential roads, studies that conclude that 20 mph limit interventions may lead to increases in emissions per vehicle, also find it unlikely that such increases would result in the creation of 'poor air quality'. Local pollutant monitoring undertaken by BCC suggests that typical locations identified for 20 mph limit intervention are unlikely to be those which exceed national air quality objective thresholds.

Studies that conclude that 20 mph limit interventions may lead to decreases in emissions conclude that it would be incorrect to assume a 20 mph speed restriction would be detrimental to ambient local air quality, as the effects on vehicle emissions are mixed and specific to each case.

6. Conclusion

While there is no general consensus within the reviewed evidence to suggest, one-way or the other, that driving at lower free-flow speeds causes increases or decreases in local pollutant emissions, studies tend to agree that in locations where traffic flows are low, such as on residential roads, the impact of a 20 mph limit intervention is not necessarily detrimental to ambient local air quality.

ⁱ TRL Report 307 – Traffic calming and vehicle emissions: A literature review, PG Boulter & DC Webster (1997).

ⁱⁱ Royal Society for the Prevention of Accidents, Road Safety Factsheet, June 2017.

ⁱⁱⁱ Jones SJ & Brunt H, 2017: Twenty miles per hour speed limits: a sustainable solution to public health problems in Wales, Epidemiol Community Health, 0: 1-8.

