Harbertonford Traffic & Issues

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1 Introduction

The A381 slices through the middle of Harbertonford. One half of the village contains a shop, post-office, primary school and other facilities. The other half contains the church, village hall, allotments and football club. Each side also has bus-stops. There are many reasons why residents need to be able to safely cross the A381.

While there are only a few reported traffic incidents, there are daily near misses and frequent minor accidents that go unreported.

The road is undoubtedly a danger to residents and it is having a significant detrimental effect on the well-being of the community of Harbertonford and **all agencies** need to hear this message and to listen to what Parish Councils, the Police, and above all the residents have been saying for many years now.

2 Traffic

The level of traffic through Harbertonford (see Appendix B) is growing year-on-year at about 1.7% a year. It is now well beyond a point where serious consideration needs to be given to the effect this is having on the community of Harbertonford, and to consider what steps need to be taken to protect residents. The main issues are: Safety, Health and Noise

2.1 Safety

The road is a hazard to residents of Harbertonford and this threat is increasing. There are multiple issues:

- 1. Traffic volumes and the size of vehicles are too large for the road (see Appendix B).
- 2. The speed of vehicles is often above 30mph, but even when a large truck is obeying the limit it is intimidating and dangerous to be driving at this speed through the village.
- 3. The signage is poor and it is inadequate to control speeds properly.
- 4. The pavements are far too narrow. On the eastern side, they are mostly about 85 cm and just 75cm in one place. This is clearly nothing like sufficient for walking next to such a busy road. The potential to be hit by a large wing-mirror or a protruding load is self-evident and means the use of this pavement is only for the nimble. It is not remotely compliant with government recommendations (ref 13).
- 5. The road is in poor condition, especially near the zebra-crossing.
- 6. The zebra-crossing is in the worst possible location (see Section 4).

2.2 Health

Polluting emissions from traffic are known to cause health issues. There are many young families living in houses in the village that are very close to this road. Emissions from traffic that is slowing then accelerating when leaving the village, will be much greater than that from constantly flowing traffic. There is a need for a plan to mitigate the effect of these damaging emissions on residents.

2.3 Noise

Traffic noise has become a real and intrusive problem. The cause is the traffic volumes and the constant braking, and accelerating away as it negotiates the village, the zebra-crossing, the bend on the south exit and the subsequent bottle-neck. This is also regularly accompanied by squealing brakes as a result of another near miss.

The poor condition of the road is also a factor.

3 Speed Limits

The current speed limit for traffic through the village is 30mph with a 20mph limit (which is only advisory) 50m either side of the zebra crossing. The volumes of traffic and the enormous size of some vehicles plus the narrow pavements and the location of the zebra crossing have created an environment which is dangerous and intimidating for residents.

The Primary School regularly has to walk children to events at St Peter's Church and using the zebracrossing is a source of considerable concern. We should not be putting children at risk in this way, nor expecting parents and teachers to have to endure the worry.

This could be alleviated by a 20mph limit (as distinct from a 'zone') through-out the village.

A 20 mph limit along the A381 from before the petrol station to 70m beyond Moreleigh Rd would:

- smooth the flow of traffic through the village
- would not cause congestion (see Appendix D)
- reduce emissions and noise
- increase safety both real and perceived
- reduce the severance of the community caused by the road

A 20 mph limit in the rest of the village would greatly improve safety and a sense of security. The current 30 mph limit on the side roads within the village is entirely inappropriate. The roads of particular concern are:

- Old Road past the primary school
- Bow Road where there are young families as well and many elderly and disabled residents.
- Moreleigh Road where traffic often descents into the village at unreasonable speeds

3.1 Consideration of 20mph Speed Limits

In considering the problems of the A381 through Harbertonford, the Department for Transport (DfT) guidance on Setting Local Speed Limits given in Circular 01/2013 para 31 ["hereinafter 01/13"] is quite clear that it is necessary to consider the following:

- collision and casualty savings;
- conditions and facilities for vulnerable road users;
- impacts on walking and cycling and other mode shift;
- congestion and journey time reliability;
- environmental, community and quality of life impact, such as emissions, severance of local communities, visual impact, noise and vibration; and
- costs, including of engineering and other physical measures including signing, maintenance and cost of enforcement.

Para 32 then makes the most important point of all:

"Fear of traffic can affect peoples' quality of life and the needs of vulnerable road users must be fully taken into account in order to further encourage these modes of travel and improve their safety. Speed management strategies should seek to protect local community life."

The Royal Society for the Prevention of Accidents (RoSPA) in its policy position on 20mph speed limits states:

"20mph zones are very effective at preventing injuries and RoSPA would like to see their wider use in residential areas.

20mph zones significantly decrease the risk of being injured in a collision and their greater use, especially in residential areas, would help to reduce the number of traffic injuries in the UK. Local authorities are responsible for determining where 20mph zones and limits should be introduced, but should take advantage of opportunities to introduce them where they are needed.

Consultation and engagement with local communities and other stakeholders is of vital importance, to make sure that safer roads are prioritised where needed and that local communities have input into the schemes' development."

3.2 Some Recent Comments from Residents

The following are some very recent comments:

"We frequently use the narrow pavement by foot to access the village shop and the service station and find it frightening to use at peak traffic hours and any other time random motorists are speeding. In fact recently my mother in her 70's lost her footing on her way to the shop which could easily have cost her her life. Luckily she regained balance quickly enough to avoid a collision. However, the approaching driver simply beeped her unsympathetically - this type of driver ignorance appears to be the norm which is the main issue here."

"Most times, when attempting to cross, there is a number of cars in a row which do not stop at the crossing. This is normally due to their excessive speed and surprise of a crossing being there. With a young baby in tow, this is a pretty frightening experience. Taking into account the amount of young children in the village, and being our route to the primary school we feel it is something on which action should be taken."

"Walking from Old road along to pedestrian crossing I had to lean right against the wall since a lorry was going way above the speed limit and clearly wasn't aware I was there. If I had been walking with a child one or both of us could have been hit."

3.3 Evidence and Accident reporting

Most accidents do not get reported. There is no legal requirement to do so if you have exchanged details at the scene and there have been no injuries. It is therefore not reasonable to base any judgement on the safety or otherwise of a site or stretch of road solely on the number of reported incidents.

Over the past several years it is clear from correspondence with Devon Highways (DH) on the matter of the A381 through Harbertonford that the concerns of residents have been dismissed purely on the basis that there haven't been sufficient reported incidents. This is clearly not reasonable nor indeed rational.

In an email on 10 July 2012 from the Neighbourhood Highways Officer to the Clerk of the Parish Council, in response to concerns about the zebra-crossing, it is stated that: "An accident spot is considered to be any location that has 4 or more incidents within a 50m radius over a period of 3 years (ie An accident cluster spot)." This same email ends with "Please accept my apologies I can not assist further with your request".

This response pre-dates 01/13 but appears to ignore the guidance given in DfT-Circular 01/2006 which requires a Highway Authority to take account of how speed can cause "severance" of a community, and

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that a key policy objective should be "improved quality of life for local communities and a better balance between road safety, accessibility and environmental objectives, especially in rural communities."

Recently it was accepted by DH that the Ashprington Cross junction was "woefully inadequate" based largely on the testimony of the Parish Council and residents. The willingness of DH to take this view is encouraging and it would be inconsistent not to bring a similar outlook to bear on the serious problems afflicting Harbertonford.

It is undoubtedly the case that Devon Highways should be governed by DfT guidance while using its discretion and its common sense, as it has exercised in the case of Ashprington Cross. This change of heart may be due the recommendations cited above. Whatever the cause it is welcome and we would invite DH now to give proper consideration to the problems with the A381 through Harbertonford.

Devon Transport Policy Note DTP 34/05

DCC's Transport Policy Note on speed limits was considered by the Place Scrutiny Committee on 14 June 2016 and it is remarkable that no mention of the existence of DfT Circular 01/13 is made in the report to the committee by Head of Highways, Capital Development and Waste. DTP 34/05 is based on DfT Circular 01/06 which was cancelled and superseded by 01/13 and therefore does not reflect current DfT guidelines.

This issue is relevant to the circumstances of Harbertonford that has suffered as a direct result of DCC officers working to policies that should have been updated six years ago.

The Corporate Infrastructure and Regulatory Services Scrutiny Committee set up the Traffic Speed Task Group (TSTG). In June 2019, the TSTG, in response to the DfT- Atkins Report on 20mph Speed Limits published in November 2018 (ref 7), published a report (ref 9).

The TSTG report finally recognises in para 3.1 the duty of a Highway Authority to have proper regard for the DfT Guidelines and makes reference to Circular 01/2013. This report also makes a number of important recommendations:

- 1. Taking a different approach to our policy of setting traffic speeds and embedding the safe systems approach.
- 2. Supporting local areas to determine their own environment.

Why DH chose to ignore DfT guidelines until the publication of the Atkin report deserves some explanation. It has as a result led to unnecessary delays in addressing the problems experienced by Harbertonford.

4 Zebra Crossing

It would appear that the current position of the zebra crossing was chosen to maximise the distance from the southerly blind bend in the road while being constrained by the splay of Woodland Road. The result is highly unsatisfactory and it is quite simply dangerous and quite frightening for many residents.

While the Parish Council may well have been involved in the decision to place the crossing at its current site, it is clear from correspondence that its involvement was limited and in any case this is not relevant and it is hoped that the position stated in the email of 26 Jan 2016 (see Appendix E) can now be ignored.

It is worth noting that as a result of conversations with Police Officers and reviewing correspondence with the Parish Council it is evident that the Police agree that the zebra-crossing is dangerous. Devon Highways need to take this into account as required by DfT Circular 01/2013 para 22.

The key issue is that the crossing is not visible for traffic coming from the south and the signage is poor. Of equal importance is the inability to see traffic coming when using the crossing.

In LTN 2/95 – Table 1 the minimum visibility requirements are laid out. For traffic approaching at 30mph the suggested minimum distance is 65m and the absolute minimum is 50m. . For traffic approaching at 25mph the suggested minimum distance is 50m and the absolute minimum is 40m.

The image below illustrates the problem:



When crossing from A1 to B1 oncoming traffic is only visible to 23m away. The stopping distance for a car travelling at 30mph is 23m, so this is right on the limit of safety.

There have been several reported incidents at this crossing and a considerable number of unreported near-misses. Using the crossing can be very intimidating and requires an act of faith that drivers will respect the speed limit of 30 mph. Many do not and the current visibility allows for no margin of error.

As detailed in Appendix A, the 23m stopping distance at 30mph is widely disputed by road safety experts and a more reasonable distance would be 34m. This would make the crossing dangerous.

Also, when pulling out of Moreleigh Road to turn right, it is often very difficult to time it correctly and it is impossible to see if there is traffic coming. Near misses are a regular occurrence.

4.1 Moving the Zebra Crossing

Option One

A much safer location for the zebra-crossing would be just south of the bridge as illustrated (B2). This would give clear visibility in both directions.

Residents regularly cross at this point and do not use the zebra-crossing as it is then possible to see oncoming traffic and so it is safer. This point represents a so called 'desire line' as described in various government guides on the positioning of pedestrian crossings. However, residents are not properly protected when crossing here and the zebra-crossing should be moved to provide that protection which they obviously need and deserve.

The consequence of relocation would mean pedestrians would need protection when crossing the bridge and may need railings or a separate footway over the river.

Relocating the crossing would mean that traffic would necessarily have slowed and would make pulling out of Moreleigh Road to turn right a lot safer. The proximity of the junction to the crossing in this case would be a benefit and should not be judged to be an issue. There are a huge number of examples where this is the case.

Option Two

An alternative would be to move the crossing to where the north bound bus-stop is currently located.

This option would greatly improve visibility but the pavement on the east-side of the road would need to be greatly improved and widened. There is plenty of scope to increase the width of the pavement so that it is 1m wide. This will require adjustments to the west side of the road.

4.2 A second Zebra Crossing

Options one and two are not mutually exclusive and consideration should be given to providing both options.

4.3 Scheduled Works

In the response to an enquiry (ENQ191254068) it was stated on 18 Sep 2019 that:

"DCC do have a works order for surfacing the A381 in Harbertonford (scheme 174220237) which remains under review for the 2020/21 financial year. The resurfaced area is expected to include the zebra crossing but it is not intended to review or move the crossing itself."

It is hoped that DH will review this position in the light of the evidence presented in this document and the importance of the valid concerns of the community of Harbertonford. There is an obvious and cost effective opportunity to address the issues as part of these scheduled works and given the seriousness of the problems it would be extraordinary not to do so.

5 Similar Locations

There is a 20mph trial scheme in Newton Abbot and Kingkerswell.

Cllr Jackie Hook is quoted as saying "... there are some 'A' roads like East Street or Torquay Road that have narrow pavements where 20mph speed limits would be appropriate and realistic"

These roads currently have a 30mph limit and this is exactly the situation in Harbertonford.

All surrounding villages have 20mph speed limits.

6 Funding

It is accepted that funds are a scarce resource; however it is clear that the situation in Harbertonford should now be given a priority.

There exists the possibility there may be funds available from the Road Safety Trust and would encourage both Devon County and South Hams District to make an application (see ref 14) prior to the deadline of 20 December 2019 as a matter of some urgency.

7 Conclusions

- The speed of traffic within the village needs to be reduced to 20 mph. This would be in line with the guidance provided by DfT Circular 01/2013 paras 12,16. (see section 3)
- 2 The zebra-crossing needs to be moved as described in section 4.
- 3 SafeZone cameras should be considered (see ref 6).
- 4 There needs to be much better signage and road markings.
- The pavements need to be greatly improved and made suitable for prams and the disabled and able to accommodate concepts like the walking school bus which requires a safe environment.
- 6 The effect of damaging emissions needs to be addressed, although 1 above partly addresses this.
- Longer term, the traffic flow through the village needs to be reduced by better policies that reduce the need for so many heavy goods movements, together with improvements in public transport, car-sharing, lorry/load sharing etc. (aka Demand Management). Also, the District Council should adopt strategic policies which will reduce traffic on the A381, not increase it (as would a hotel in Kingsbridge built by the Council on behalf of Premier Inn)

References

- 1. Department for Transport Circular 01/2013 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/63975/circular-01-2013.pdf
- 2. Department for Transport Circular 01/2006 http://www.20splentyforuk.org.uk/UsefulReports/dftCircular12006.pdf
- 3. Devon Traffic Policy Note (DTP 34/05) Scrutiny Consideration 2016 https://democracy.devon.gov.uk/documents/s1954/ms260516psc%20Department%20for %20Transport%2020mph%20Speed%20Limits%20including%20police%20Representation.pdf
- 4. Traffic Signs Regulations and General Directions https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/523916/DfT-circular-01-2016.pdf
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- 7. Department for Transport Atkins Report of 20mph Speed Limits https://www.gov.uk/government/publications/20-mph-speed-limits-on-roads
- 8. DCC Road and Transport Safety https://www.devon.gov.uk/roadsandtransport/safe-travel/road-safety/safer-roads/
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- 10. Roads: pedestrian accidents on the pavement https://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN00627#fullreport
- 11. How to design and install pedestrian crossings (LTN 2/95) https://www.gov.uk/government/publications/the-design-of-pedestrian-crossings-ltn-295
- 12. Manual for Streets 2 https://tsrgd.co.uk/pdf/mfs/mfs2.pdf
- 13. Inclusive Mobility
 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/3695/inclusive-mobility.pdf
- 14. The Road Safety Trust https://www.roadsafetytrust.org.uk/small-grants-2019

Appendix A – Stopping Distances

The formula for stopping distances as defined in the Highway Code is: Stopping Distance = Thinking Distance + Braking Distance

> Thinking Distance = Velocity x Reaction Time Braking Distance = Velocity² / 2 Deceleration rate

So we have: Stopping Distance = $vt + v^2/2d$

where: v = velocity(m/s) t = reaction time (seconds) and d = deceleration (m/s²)

The Highway Code assumes a reaction time (t = 0.67) and a deceleration rate (d = 6.57). From this we get the following table as quoted in the Highway Code:

| Speed | Stopping | | |
|-------|----------|--|--|
| (mph) | Distance | | |
| | (metres) | | |
| 20 | 12 | | |
| 30 | 23 | | |
| 40 | 36 | | |
| 50 | 53 | | |
| 60 | 73 | | |
| 70 | 96 | | |

However, Brake, the road safety charity have recently attained figures from the Transport Research Laboratory (TRL) that indicates that the average thinking time is 1.5 seconds which is more than double the 0.67 seconds set out in the highway code. Based on this figure the table becomes:

| Speed | Stopping |
|-------|---------------|
| (mph) | Distance |
| | (metres) |
| 20 | 12 + 7 = 19 |
| 30 | 23 + 11 = 34 |
| 40 | 36 + 15 = 51 |
| 50 | 53 + 19 = 72 |
| 60 | 73 + 22 = 95 |
| 70 | 96 + 26 = 122 |

There is increasing concern that the Highway Code stopping distances are too short and it is clear therefore that the Highway Code stopping distances should be treated with caution and not taken as the absolute measure of safety and as ever where there is scientific doubt the Precautionary Principle should be applied.

Appendix B – A381 Traffic Data

Source: https://roadtrafficstats.uk/traffic-statistics-devon-a381-totnes-16982

| | 20010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 |
|------------------------|--------|--------|--------|--------|--------|--------|--------|--------|
| Pedal Cycles | 20 | 17 | 49 | 48 | 38 | 38 | 38 | 38 |
| Motorcycles and Mo- | | | | | | | | |
| peds | 139 | 151 | 97 | 101 | 110 | 111 | 111 | 108 |
| Cars | 8,618 | 8,566 | 8,526 | 8,507 | 8,485 | 8,426 | 8,531 | 8,520 |
| Buses and Coaches | 142 | 146 | 81 | 79 | 82 | 84 | 82 | 80 |
| Light Goods Vehicles | 1,631 | 1,675 | 1,774 | 1,836 | 1,911 | 2,081 | 2,247 | 2,378 |
| Two-axle Rigid HGVs | 187 | 181 | 282 | 273 | 267 | 279 | 292 | 301 |
| Three-axle Rigid HGVs | 58 | 60 | 67 | 70 | 74 | 83 | 80 | 82 |
| Four-axle Rigid HGVs | 13 | 14 | 19 | 21 | 22 | 23 | 27 | 28 |
| Three-axle Articulated | | | | | | | | |
| HGVs | 10 | 7 | 19 | 15 | 14 | 18 | 18 | 19 |
| Five-axle Articulated | | | | | | | | |
| HGVs | 7 | 7 | 32 | 32 | 29 | 29 | 27 | 27 |
| Six-axle Articulated | | | | | | | | |
| HGVs | 45 | 45 | 29 | 31 | 32 | 32 | 33 | 34 |
| All HGVs | 320 | 314 | 449 | 441 | 438 | 465 | 478 | 491 |
| All motor vehicles | 10,850 | 10,852 | 10,927 | 10,964 | 11,027 | 11,166 | 11,449 | 11,578 |
| | | | | | | | | |
| Total excluding pedals | 11170 | 11166 | 11375 | 11406 | 11464 | 11631 | 11926 | 12068 |
| | | | | | | | | |

Rate of increase: 1.015 1.025 1.01191

Average rate of increase: 1.01728

Projected total for 2019: 12489

Notes:

12,489 movements a day does not reveal the real problem of traffic flow at different times of the day. This data is not available, but it is reasonable to assume that most of the traffic (90+%) will be between 06:00 and 20:00 and many traffic flow profiles show this to be the case. This then gives a 14-hour window and on this basis there will be an average of 802 movements an hour, or 13 per minute during the day. There will of course be periods when the traffic flow exceeds these figures.

The traffic flow through the village is often concentrated into 'waves' that can last for 10 minutes. There are three main reasons for this:

- 1. Traffic volumes are often well above the threshold of "synchronised flow" and so small events will precipitate the well known phenomena of bunching and jams.
- 2. Large vehicles having difficulty negotiating the bridge in Harbertonford causing traffic to back up
- 3. Large vehicles having difficulty passing each other on the A381 both within Harbertonford and when approaching the village from both the north and south.

Appendix C –This is DANGEROUS.

This truck is moving at 20+mph and shows the lack of any proper safe haven for pedestrians passing the front of the pub.



Appendix D - Congestion

Currently traffic passes through the village at 30mph for 300m and 20mph for 100m taking on average *34 seconds*, assuming no stops or hold ups.

At 20mph for the full 400m it would take 44 seconds.

Therefore a 20mph speed limit through the village will result in an average increase in journey time of just 10 seconds.

This is way below the current spread of journey times (see notes in Appendix B) and would hardly be noticed and would therefore not cause added congestion. There is every possibility it may reduce the average time to travel through the village by smoothing the traffic flow.

Appendix E – History

| nstory |
|---|
| Interactive signs – both lack any impact and are very weak. One is barely visible |
| on a sunny day. |
| In a letter from DH to the PC dated 07 Mar 2008, DH appears to admit that the |
| interactive signs are not effective, and they keep breaking down. |
| Accident at crossing (car rammed into the back of a car stopped at crossing) |
| while lady with pram was on the crossing. Police car overtaking queue stopped at crossing came around blind corner on the |
| wrong side of road from the south at speed caused alarm to those on crossing. |
| DH states in an email 26 Jan 2016 (with breathtaking insouciance): |
| "With regard to the Zebra Crossing, whilst I still have not received details of the collision from the Police I must reiterate my comments to Councillor Waite that 2 collisions in 10 years whilst of concern to the community is not at a level considered significant enough to justify further investigation. I would add that, having been involved in discussion over many years regarding the history of this facility I am aware of the necessary compromises made when the site was originally identified. My recollection is that the Parish Council was, at the time, fully involved in the decision to site the crossing where it is. Subsequent improvements to the signing were also made at the request of the Parish Council. |
| Woman hit on crossing |
| Interactive signs installed |
| Protest on crossing + petition with 100 signatures |
| https://www.youtube.com/watch?v=1Z2hHUdebcQ |
| incpon/www.journacom/watcom/ / Incaposity |
| Signs installed but not working just faint glow |
| Young girl hit (and hospitalised) by car coming from Totnes at 08:15 |
| Skid resistance surface added to crossing. |
| The zebra-crossing is put in place. |
| PC Minutes: Following the site meeting at A381 bridge in Harbertonford re the proposed pedestrian crossing, Cllr Monaghan reported that 3 councillors had attended, together with John Halliday, Peter Hookham and an engineer from DCC. A request for advance warning lights was being considered and new working drawings were being prepared which would move the crossing slightly further from the bridge, as the councillors considered that the traffic approaching from Kingsbridge would not have sufficient warning of the crossing. Regarding the Listed Building Consent for the footway across the western side of the A381 bridge, it was proposed by Cllr Monaghan, seconded by Cllr E Janes, to support this. 9 in favour, 1 abstention. |
| PC Minutes: The Chairman then introduced Mr P Hookham of DCCHighways, who was already known to everyone and invited him to speak. Mr Hookham told the meeting that he carried good news. He had been given extra funds from central government, which meant there would be £640,000 per annum to spend on capital highway projects for the next five years in the South Hams. The Totnes area, which included Harberton Parish, would attract one quarter of the sum mentioned and he would like the Parish Council to inform him of their list of projects to improve the Parish. Mr Hookham will supply some large scale maps and the Clerk will write to him with the improvements which will include a pedestrian crossing by the bus shelter in Harbertonford. After further discussions, Mr Hookham left the meeting. |
| |

| Mar 2001 | PC Minutes: DCC. Local Transport Plan 2001/6. Details received from DCC's Peter Hookham re proposals for a pedestrian crossing across A381 by the bus shelter in Harbertonford, together with an extension to double yellow line around the corner to Woodcourt Road. After discussion it was agreed that the Annual Parish Meeting should be held at the next meeting on 10 April and that Peter Hookham be invited to speak. All in favour. | | | |
|----------|---|--|--|--|
| Nov 2000 | PC Minutes: A letter from Mrs Pope of Harbertonford was read to the meeting. This letter pointed out that, if there could be traffic lights for a pedestrian crossing, it would be much safer to cross, as was the case during the road works on the A381 recently. | | | |

Appendix F - Correspondence

The Parish Council was copied correspondence from Devon Highways dated 04 Jun 2018, in response to questions sent to SHDC, which contains the following statements:

- Q: To establish a mandatory 20 mph speed limit on the A381 in Harbertonford between the filling station and Chapel Lane.
- A: DCC speed limit policy is clear that in order to introduce 20mph speed limits there has to be speed related 3 year casualty accident records, which there is not. Mean speeds also need to be around 20mph. The mean speeds are actually closer to 30mph in this case. Traffic Calming on the A Road is also not possible as this is a district distributor road and has a strategic function. Therefore the existing speed limit is appropriate. Therefore DCC Highways would not support this suggestion.
- Q: To establish a mandatory 20 mph speed limit along Old Road adjacent to the primary school
- A: DCC speed limit policy is clear that in order to introduce 20mph speed limit at the school there has to be speed related 3 year casualty accident records, which there is not. Mean speeds in this case are already around 20mph therefore there is little justification for a 20mph speed limit. Therefore DCC Highways would not support this suggestion.

So to summarise, a 20mph speed limit would not be appropriate when:

- 1. the means speeds are close to 20mph
- 2. the means speeds are above 20mph

This smacks of a Catch 22. It is not correct and it is not a reasonable response to the severe problems faced by the community of Harbertonford and does not take account of the many factors needed when assessing the appropriateness of a 20mph speed limit.

- Q: To improve pedestrian safety within Harbertonford including the provision of an additional or replacement pedestrian road crossing, with safe pedestrian access from each side of the bridge.
- A: The crossing is a zebra crossing as it needs to remain on the pedestrian desire line. There are constraints on how close certain types of crossings can be sited to junctions and a zebra crossing is a minimum of 5m where as a pelican crossing must be 20m. Therefore it would be counterproductive in safety terms to change the crossing type. Therefore DCC Highways would not support this suggestion.

The Highway Authority should be aware by now that the current location of the zebra crossing is not on the pedestrian 'desire line'. It has been repeatedly told about the issues with this crossing and DfT Guidelines require it to properly engage with the community to address these.