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Date 06/02/2024

Dear Tim

A515 Buxton Road, Ashbourne: Air Quality Management Area

Thank you for your email dated 15th January 2024 regarding two questions requested by the District Council's Community and Environment Committee:

1. Why is DCC opposed to the introduction of a 20mph zone within the town.
2. Why is DCC opposed to the introduction of weight limits on the A515, which would divert heavy goods traffic.

Before I respond to the two specific questions it is important to restate that the Council remains committed to working with the District Council to deliver transport measures to tackle poor air quality in Ashbourne town centre. As you are already aware, the Council's Cabinet Member for Highways, Assets and Transport has committed to deliver actions for inclusion in the Air Quality Management Area (AQMA) Action Plan, including:

- Continuing to develop proposals for a A515 Ashbourne Relief Road: as we reported to Cabinet in September 2023 there is further work required on modelling flood risk and mitigation before a planning application can be submitted. We are working with our professional services consultants on this and will be able to advise in due course on the development programme.
- We have begun implementing an intelligent transport management system (ITS) in Ashbourne to provide opportunities to manage air pollution by optimising traffic flow. The introduction of Urban Traffic Control (UTC) to all traffic signal junctions and controlled pedestrian crossings in Ashbourne will provide a centralised co-ordination of traffic signals and optimise traffic flow. In addition, the application of Bus Priority for late running buses via the UTC system will assist with ensuring buses remain on schedule thus improving journey reliability. This project includes the first deployment of UK-leading technology in Derbyshire, including nine air quality sensors and a wide network of road traffic sensors across the town to build into the development of a new 'Visum' model. This model and the sensors will enable specialist traffic and air quality modellers to optimise our Control Room systems via the UTC to manage traffic flows to achieve better air quality and bus priority in real time. The scope of

the proposed network of sensors is also being expanded to additional routes to support a comprehensive review of heavy goods vehicle routing and possible selective route restrictions within the town centre. The first phase of traffic signal upgrades to support the ITS has now commenced at A517/Park Road junction and will shortly be followed by the Derby Road five-ways junction. We will also install new traffic signals at the Station Road/Church Road junction. The Visum model will also confirm whether additional traffic signals are required at the A515 Windmill Lane junction to better manage traffic entering the AQMA area.

- Delivering the public realm work package and supporting a mobility hub within the Methodist Church associated with Ashbourne Reborn to encourage more Ashbourne residents and visitors to use sustainable travel modes in the town centre.
- Bringing together a Minerals Industry Transport Roundtable meeting in February 2024 which will specifically discuss local freight issues, including the A515 Ashbourne Air Quality Management Area.
- Planned delivery of additional electric vehicle charging points in a town centre car park and consideration of 30 requests for deployment of street lamppost charging points via our Low Emission Vehicle Infrastructure programme, due to commence during 2024.
- Assisted development of three Travel Plans associated with land use developments proposed in the town.

20 Mph Zones

The Council's current 20mph zone policy is set out in its Speed Management Protocol and states:

20mph speed limits / zones are introduced sparingly, with casualty reduction being a priority for the selection of such schemes. Several trial sites will however be undertaken to ascertain whether there is further health, well-being and / or speed and casualty reduction benefits from 20 mph limits without associated engineering measures, and should subsequent monitoring reveal this is the case, then a review of this protocol would follow.

In line with this policy, the Council has previously advised to the District Council, and at your previous AQMA public engagement events, that a 20mph zone in Ashbourne would not be considered until it had completed consultation on two pilot area-wide 20mph zone proposals in Buxton and Long Eaton. The Council has now completed extensive stakeholder and public engagement associated with the two proposals to introduce 20mph zones. However, based on the outcome of these consultations, the Council has decided that it is not planning any further proposals to trial 20mph zones at other locations within the County, unless this is associated with casualty reduction.

With regards to Ashbourne, it is pertinent to restate the response from the Police and to note the comment regarding 'strategic routes' which is of relevance to the A515 Buxton Road, which is the Primary Route between Ashbourne and Buxton:

The Police raised "*grave concerns*" about the blanket implementation of 20mph speed limits without any physical traffic calming measures (or similar) to aid compliance. There were concerns about the strategic routes that the 20mph speed limit affect. The Police view is

that the speed limit proposals would present them with an unreasonable enforcement task. The lower speed limit would raise the expectations of the public and generate a high level of calls for enforcement for perceived non-compliance which they would not be able to react to with their current resources.

The Council only introduces traffic calming measures where there is clear justification on the grounds of road safety because these measures are generally not supported by the public due to them creating noise and vibration and increase in pollution. Consequently, these measures are not considered appropriate to aid compliance in this location, notably where there is an existing air quality problem and location where there are many listed buildings.

Introduction of Weight Limits

The Council's current policy supports weight restrictions for environmental reasons on routes which have been identified as unsuitable for use by heavy goods vehicles, and where there is a better and equally convenient alternative. Weight restrictions for environmental reasons are usually used to prevent heavy goods vehicles from using minor roads as inappropriate short-cuts between main routes.

In considering the appropriateness of the A515 for environmental weight restrictions, the Council took due regard to the existing role of the A515 as a Primary Route between Ashbourne and Buxton. The Department for Transport advises that a Primary Route is a connection between two primary destinations which must remain reasonably direct and viable for medium – and long – distance travel including, wherever possible, for freight traffic.

In determining convenient alternatives, the trip length for diverting vehicles is considered. The existing A515 route between Ashbourne and Buxton is approximately 20.5 miles. The two most reasonable alternatives are:

- Buxton-Leek-Ashbourne via A53, A523 and A52 existing Primary Routes is approximately 26.5 miles.
- Buxton-Cromford-Belper-Ashbourne via A515, A5012, A6 and A517 is approximately 39 miles.

The shortest of these routes would incur a 30% increase in trip distance and would incur additional travel time and costs for local businesses travelling between these destinations.

When considering a proposed weight restriction for any route or area, the Council must give careful consideration to the impacts of those vehicles that are re-routed. The following environmental and health constraints were identified as potentially worsening or displacing issues should vehicles be re-routed:

Buxton-Leek-Ashbourne via A53, A523 and A52

- The A53/ A523 at Leek are both included within the area of the declared Leek AQMA. The Action Plan for this AQMA states that measures should be targeted to reduce emissions from both cars and heavy goods vehicles. It was therefore

considered that re-routing heavy goods vehicles via Leek would displace negative impacts and would increase air quality emissions in another declared AQMA.

- The A53 is bounded by the South Pennines Special Area of Conservation (SAC) and South Pennines Special Protection Area (SPA) and the A52 is in close proximity to the Peak District Dales (SAC). Whilst the impact of re-routing heavy goods traffic on these habitats and species has not been undertaken, it is noted that previous advice from Natural England that any proposed policy which would increase traffic within a SAC or SPA would require appropriate assessment to assess impacts of increased nitrogen deposition associated with increased emissions from traffic. It was therefore considered that re-routing heavy goods vehicles via Leek could have potential to impact on protected habitats and species.

Buxton-Cromford-Belper-Ashbourne via A515, A5012, A6 and A517

- The A5012 is bounded by, and dissects, habitats included within the Peak District Dales SAC. As set out above it was also considered that re-routing heavy goods vehicles via the A5012 could have potential to impact on protected habitats and species. It should also be noted that this constraint would also apply to re-routing vehicles via the other alternative route from Buxton to Cromford via the A6.
- The A5012 has previously been identified as one of England's highest risk roads for road safety. Whilst there are no specific risks associated with heavy goods vehicles, it is noted that the road presents a challenge for all road users as the road climbs from east to west via a series of bends through a wooded valley.

On this basis the two route options were not considered as convenient alternatives. Similarly, these constraints also limit the opportunities for encouraging longer distance journeys to use nearby alternative routes.

I trust that this response provides the necessary information requested and explains the background to why the Cabinet Member for Highways, Assets and Transport did not include the introduction of an Ashbourne 20mph zone or weight limits on the A515 within the list of approved interventions to be included within the AQMA Action Plan.

Yours sincerely



Chris Henning
Executive Director - Place