

Committee	Regulatory Planning Committee
Date	15 October 2025
Report by	Director of Communities, Economy and Transport
Subject	Traffic Regulation Order - A259 Eastbourne Road and Pevensey Bay Road (40mph Speed Limit)
Purpose	To consider the objections to the proposed Traffic Regulation Order
Contact Officer:	Michael Higgs – Tel: 07701 394506
Local Members:	Councillors Penny di Cara, David Tutt and Tom Liddiard

RECOMMENDATIONS:

The Planning Committee is recommended to:

- 1) Not uphold the objections to the draft Order; and**
 - 2) Recommend to the Director of Communities, Economy and Transport that the Traffic Regulation Order be made as advertised.**
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CONSIDERATION BY DIRECTOR OF COMMUNITIES, ECONOMY AND TRANSPORT

1. Introduction

- 1.1 The Lead Member for Transport and Environment approved an allocation of £500,000 to a 3-year Speed Management Programme to review the speed limits across the county's A and B-class road network, assess whether the existing speed limit is appropriate, and identify areas where the speed limits could be reduced or made more effective.
- 1.2 The initial appraisal process assessed each A and B-class road against a priority framework that considered a range of factors based on the Council's policy on Local Speed Limits (PS05/02) which is based on the national guidance provided by the Department for Transport. These included the character and road environment, the average speed of traffic, the number of vulnerable road users, facilities like shops, schools and medical facilities in the area, the existing crash history and community concern. A copy of policy PS05/02 is included in Appendix 1. This process identified 16 priority sites to be taken forward in the first 2 years of the Speed Management Programme.
- 1.3 The A259 Eastbourne Road and Pevensey Bay Road was identified as a priority for a potential 40mph speed limit in the first year of the Speed Management Programme. A Location Plan is provided in Appendix 2.

2. Consultation

- 2.1 The draft Traffic Regulation Order (TRO) was advertised in the Eastbourne Herald on 6 June 2025. Notices and copies of the relevant plan were advertised at regular intervals along the route for the minimum statutory period of 21 days. The consultation closed on 27 June 2025. The details were also available on the County Council's consultation

hub for members of the public to view and submit representations. A copy of the Notice and Plan indicating the extent of the proposed 40mph speed limit that was displayed on-site is included in Appendix 3.

- 2.2 During the consultation period 21 representations were received supporting the proposed 40mph. One outright objection to the proposal, and 2 representations requesting a lower 30mph speed limit, which are treated as objections for the purposes of this report, were also received. A further 2 letters of support were received the day after the consultation closed. Some of the representations received also requested a signalised crossing or pedestrian island be provided to make it safer to cross the road and provision of a Vehicle Activated Sign (VAS). Copies of the representations received are available for Members to view in the Members' Room and electronic copies have been made available to the Members of the Planning Committee. The representations received are summarised in Appendix 4.

3. Comments and Appraisal

- 3.1 The proposed lower 40mph speed limit was identified as a priority as part of the Speed Management Programme. This only identified lengths of the A and B-class roads where a lower speed limit could potentially be introduced based on Local Speed Limits policy PS05/02. The scope of the project does not extend to the consideration of a signalised crossing or pedestrian island. These types of improvements will be assessed and prioritised for potential inclusion in a future year's capital programme of transport improvements based on the priorities in the fourth East Sussex Local Transport Plan (LTP4).
- 3.2 In respect of the 2 requests for a lower 30mph speed limit, the policy on Local Speed Limits (PS05/02) recommends that 30mph speed limits are appropriate in built-up areas and villages with "20 or more properties served by private accesses that adjoin the main road (on one or both sides of the road) over a length of not less than 600-metres, and clearly visible to drivers" with average traffic speeds below 33mph.
- 3.3 The setting of appropriate speed limits has been subject to a significant amount of research nationally. Introducing a speed limit that is too low for the road environment is not effective, as drivers will continue to travel at higher speeds, resulting in a poorly complied with speed limit. Although it is acknowledged that there is some visible development on this part of the A259, it is set back from the road, so it does not give drivers sufficient visual messages to support a 30mph speed limit.
- 3.4 The mean speed of traffic is used to determine an appropriate speed limit for a road, as it reflects the speed that most drivers consider to be safe to travel based on their assessment of the road environment. Traffic data available to the County Council, recorded the average speed of traffic on this part of the A259 to be 40.7mph eastbound and 38.3mph westbound over 7 days. The mean speed of traffic indicates that a 30mph speed limit would not be effective.
- 3.5 Policy PS05/02 indicates that 40mph speed limits are appropriate in less built-up areas with setback properties with accesses indicating the need to reduce speed with a noticeable presence of vulnerable road users and mean vehicle speeds below 42mph. There is some new and ongoing development on the road with a popular shared cycle/pedestrian route and 8 bus stops along the part of the A259 that will potentially benefit from a lower 40mph speed limit. The new development and connections to the cycle/pedestrian track will only increase popularity of the route. The recorded mean speed of traffic is also in accordance with Section 5 of the Council's Local Speed Limit policy PS05/02 for a 40mph speed limit.

- 3.6 The police were consulted on the potential 40mph speed limit prior to it being advertised. They were satisfied that the existing traffic speeds are within the Department for Transport thresholds and East Sussex County Council's policy for a reduced speed limit, and they could not find any technical aspect that does not comply with current guidelines.
- 3.7 Notwithstanding the above comments that justify why a 40mph speed limit is being proposed, it does need to be noted that consideration can only be given to the measures, as advertised, and representations made. This means that deciding to uphold the objections that seek a 30mph speed limit and require its implementation would not be legally permissible as such a proposal has not been advertised.
- 3.8 During the 3-year assessment period used for the appraisal process to identify the 16 priority sites to be taken forward in the first 2 years of the Speed Management Programme, there were 4 killed or serious injury (KSI) crashes, and 6 slight personal injury crashes reported to the Police on this part of the A259.
- 3.9 One objection raised concern over the consultation undertaken. As stated in Paragraph 2.1 of the report, the proposal was advertised in the local press and Notices and Plans indicating the proposal were put up ahead of the 21-day statutory consultation period. Checks were made to ensure they were still in place when the consultation closed on 27 June 2025.
- 3.10 The aforementioned objection also raised concerns about the impact on traffic efficiency that the lower speed limit may have. The length of the proposed 40mph speed limit is 1.25km. A vehicle travelling at 50mph takes 56 seconds to travel along this length of road. A vehicle travelling at 40mph takes 70 seconds, a 14 second difference.
- 3.11 The outright objection to the 40mph speed limit expresses concern that alternative measures, such as vehicle activated signs, pedestrian refuges or signalised crossings, have not been considered as measures to address hazards. Policy PS05/02 recommends that engineering measures appropriate to the function of the road should be investigated to reduce vehicle speeds where the average speed of the traffic is above the threshold provided in Section 5 of Local Speed Limit policy PS05/02. The average speed of traffic is below 42mph threshold, so the potential 40mph speed limit will be effective without engineering measures.
- 3.12 Alternative measures like a signalised crossing, a Vehicle Activated Sign (VAS) or pedestrian refuge is outside the scope of the Speed Management Programme. The cost would be significantly higher than the traffic signs and road markings required to introduce the potential 40mph speed limit. As a result of the higher cost, these types of measures need to be prioritised and assessed as part of the Council's Capital Programme of Transport Improvements. There are 40mph speed limits on the East Sussex A-class road network that have helped improve road safety without causing additional congestion.

4 Conclusion and Reasons for Recommendation

- 4.1 The A259 Eastbourne Road and Pevensey Bay Road was identified for a lower 40mph speed limit in the first year of the Speed Management Programme. The speed data that is available to the County Council recorded the average speed of the traffic to be 40.7mph eastbound and 38.3mph westbound. This is in accordance with the Department for Transport and East Sussex County Council's thresholds for a 40mph speed limit. This is also the view of Sussex Police.

- 4.2 During the 3-year assessment period up to 31 December 2023 that was used to prioritise the Speed Management Programme there were 3 killed and serious injury (KSI) crashes, and 7 slight personal injury crashes reported to the police.
- 4.3 If a 30mph speed limit was introduced on this part of the road, it would not be effective as it would be set too low for the road environment. If a 30mph speed limit was introduced drivers would continue to travel at higher speeds resulting in a poorly complied with speed limit.
- 4.4 There is no evidence that a 40mph speed limit would cause additional congestion. Alternative measures such as a signalised crossing, pedestrian refuge or vehicle activated sign (VAS) are outside the scope of the Speed Management Programme.
- 4.5 The proposed Traffic Regulation Order (TRO) was advertised in the Eastbourne Herald on 6 June 2025. Notices and Plans were put up on-site for 21 days, so the statutory requirements for advertising the Order were met.
- 4.6 It is recommended for the reasons set out in the report, that the Planning Committee does not uphold the objections, and recommends to the Director of Communities, Economy and Transport that the Traffic Regulation Order is made as advertised.

RUPERT CLUBB

Director of Communities, Economy and Transport

Background Documents

None