

Slough Borough Council

REPORT TO:	Cabinet
DATE:	19 December 2022
SUBJECT:	Department for Transport's Safer Roads Fund – approval for A4 scheme proposal
CHIEF OFFICER:	Richard West, Executive Director of Place and Communities
CONTACT OFFICER:	Misha Byrne, Transport Lead
WARD(S):	ALL
PORTFOLIO:	Cllr Nazir, Transport & Local Environment
KEY DECISION:	YES
EXEMPT:	NO
DECISION SUBJECT TO CALL IN:	YES
APPENDICES:	Appendix 1 - Speed reduction proposals, consultation map Appendix 2 - Tabled objections to proposed speed reduction Appendix 3 – Initial Equality Impact Assessment, Safer Roads Fund

Summary and Recommendations

The A4 in Slough was identified in 2016 as being in the UK's 50 most dangerous roads and SBC are required by Government to make changes to improve its safety. This report seeks approval to introduce road safety improvements on the A4 that will be funded by the Department for Transport's (DfT) Safer Roads Fund grant. A bid was submitted to the DfT in 2017, with the Council advised of a total grant award of £1.7m in 2018. Funds were allocated to the Council in March 2021.

A number of road safety measures will be designed and introduced to regulate driver behaviour. One of these measures is a proposed speed reduction on some sections of the A4 for which a consultation exercise has been undertaken and presented in this report. Additional complementary engineering measures, to reduce the number and severity of fatal and serious injury collisions, will be introduced as the overall scheme design progresses in consultation with residents, key partners and subject to the necessary approvals within the Council.

Recommendations:

The Cabinet is recommended to:

- a) Delegate authority to the Executive Director for Place and Communities, in consultation with the Lead Member for Transport and the Local Environment, to proceed with the statutory process to implement the speed restriction only for defined sections of the A4, having considered the consultation responses set out in this report and following consideration of any statutory objections.
- b) Agree for a further report in June 2023 to receive officer recommendations for final scheme design for other aspects to mitigate and support casualty reduction.

Reason:

Approving the recommendations set out in this report will enable the Safer Roads Fund's road safety measures to be implemented to ensure ongoing improvements to road safety and transport infrastructure in the Borough. The implementation of the road safety measures will contribute to reducing the number and severity of collisions on the A4 in Slough.

Commissioner Review

Commissioners support the proposals.

1.0 Report

The Safer Roads Fund was announced in the Government's 2016 autumn statement to improve the country's 50 most dangerous 'A' roads. The roads were identified in the Road Safety Foundation's report 'Making Road Travel as Safe as Rail and Air', which classed the A4 in Slough in the national list of 50 high-risk roads, using data supplied by the Road Safety Foundation.

The DfT's Safer Roads Fund objective is to facilitate a Safe Systems approach to harm reduction. This approach outlines that individuals are fallible, so some collisions will inevitably happen. Where individuals are subjected to collisions, the Safe Systems approach seeks to recommend appropriate interventions that will reduce the number and severity of those collisions. Therefore, using grant funding, it is possible to proactively manage risk on the network and take a holistic, strategic approach to risk reduction.

The identified route comprises the A4 between junctions 5 and 7 of the M4 through the Borough. While historical collision data informed the Department for Transport's (DfT) selection process, the approach to identifying specific sections for treatment used an assessment of hazards and road features via a bespoke software analysis of a road video (IRAP tool, International Road Assessment Model). No figures were provided stating specific risk rates, but an analysis of fatal and serious collisions was undertaken that showed 3 fatal and 44 serious collisions on this route in 2011-2015 (the data and period defined by the DfT at the time of the bid). For completeness, fatal and serious collisions between 2016 to February 2022 shows there were an additional 4 fatal and 42 serious collisions on the A4 during this latter period.

A review of the route using the bespoke software tool and methodology identified the following series of road safety measures to reduce risk and hazard removal:

- 30mph speed limit along appropriate extents of the A4 – to reduce the severity of collisions when they occur.

- average speed cameras – to monitor speed over a longer stretch of road and aid driver compliance.
- red-light camera systems – to detect speed and red-light violations as well as illegal turns and pedestrian crossing violations.
- road surface treatments – to improve vehicle grip particularly in adverse weather conditions.
- improved pedestrian and cycle crossings – for safe movement.
- removal of roadside hazards – improve visibility for all road users.
- decluttering - improve visibility and legibility for all road users.

Following the successful submission in 2017 of the Council's business case outlining the interventions to the DfT's Safer Roads Fund, Slough Borough Council was awarded £1.7m for a scheme to be introduced and profiled over a 2-year programme. Due to the pandemic, the DfT delayed payment of the grant allocation to March 2021.

Since the proposals were submitted as part of the application, several local and national priorities have changed. The grant funding will therefore be used, in part, to review the original plans and tailor the scheme to meet the changed environment, prior to implementation and subject to DfT approval. Planning for the SRF scheme will now include consideration of the £10.4m, awarded to Slough by Active Travel England (DfT, 2021), to deliver a dedicated A4 cycle route. There remain clear opportunities to synergise the Safer Roads fund road safety measures and A4 cycle route scheme implementation to maximise the borough's overall gains and reduce overall and respective delivery costs.

2.0 Background

The SRF project is specifically targeted at regulating driver behaviour and delivering road safety engineering interventions to reduce the number and severity of collisions along the A4. This proactive approach marks a change to the conventional road safety approach undertaken by the Council, which has previously prioritised funding at locations where incidents or a cluster of incidents has occurred. With the SRF scheme, the approach shifts to introducing preventative measures before a collision happens. Based on the Road Safety Foundation's analysis, there are 37 road sections assessed as being 'high-risk' and then 13 'medium-risk' road sections. The Council submitted the original proposal, which set out a benefit-cost ratio (BCR) of 8:1, estimating 54 fatal and serious injuries saved over 20 years. It is, however, essential that any proposed changes resulting from rerunning the IRAP model does not reduce the BCR safety rating. The revised programme of interventions will be submitted to the DfT for approval by January 2023.

The sections of the A4 with the highest risk are those with a 40mph speed limit as there are many uncontrolled junctions and entrances that could potentially lead to side-impacts with turning traffic. Given the limited space available it would not be possible to engineer out these conflicts. A proposal to reduce the speed limit to reduce the chances of serious injuries occurring in these types of collisions has been proposed and consultation results have been summarised (point 2.6).

Although speed compliance is currently good at peak times due to congestion, at other times free-flowing traffic speeds are high and a linked enforcement infrastructure will be put in place. Slough has experienced officers dealing with dual speed and red-light cameras and new technologies are also being considered for implementation. Away from the sections affected by speeds, the highest risks are posed by roadside hazards such as barriers together with isolated areas of poor road surface.

3.0 Proposed programme

A high-level approach to revise the outputs and proposed engineering interventions to deliver the SRF project includes:

Assess potential changes and priorities for the route

- The impact of the COVID-19 pandemic has shown the potential for active travel modes such as cycling and walking. There are increased incentives to deliver more sustainable and healthy transport modes where possible. Since the original plans were drawn up there have been new land use development plans approved which may also impact on traffic and safety along the route. These will be considered.

Review original scheme and consider changes to original proposals

- The original analysis and revised proposal will be submitted to the DfT. This will reflect any changes to the road, either implemented or planned since the original proposal, together with any new traffic or speed data.
- Traffic volumes and speeds for 2021 compared to 2016 (as used in the submission) have been analysed, with the road to be re-analysed in the iRAP ViDA tool with assistance from consultants and the Road Safety Foundation who are the UK experts in the use of the software.

Public Consultation Exercise

- A consultation exercise around the proposed counter-measures will be undertaken with relevant businesses, communities and members of the public and councillors as the scheme is designed in full.
- One consultation has been undertaken for the proposed changes to speed limits on defined sections of the A4 (Appendix 1) and undertaken between 26 August and 7 October 2022.

Commercial activity to procure specialist suppliers and award contracts

- To deliver specialist work related to scheme delivery, a procurement exercise will be undertaken. SBC will look to the market to offer innovative and cost-effective solutions. Where possible, small to medium enterprises will be encouraged to participate in the tender process, subject to meeting SBC's contract procedures.

Deliver scheme outputs

- Scheme delivery will be undertaken by the Council's Direct Services Organisation (DSO).
- A procurement exercise will be undertaken for delivery of specialist work that cannot be delivered by the DSO.

Monitoring and Evaluation

- A project manager will be responsible for tracking benefits and reporting any exceptions to the DfT/ Members, monitoring during implementation and ensuring that mitigation measures identified in the risk register are undertaken and adhered to.
- 'Before' speed surveys and collision data analysis have been undertaken. These provide a baseline for establishing if the scheme has been a success once implemented, when further surveys and analysis will be undertaken. Outcomes will be monitored one year post implementation. Findings will continue to inform the Council's strategic approach to Road Safety.

3.1 Speed reduction consultation

One of the proposed measures (in the suite of proposed measures) is to reduce speed limits on the A4 (Appendix 1, consultation map). A consultation was carried out between 26 August and 7 October 2022. Five sections of the A4 were identified and tabled as below. The Council received 119 responses in total, with 108 respondents (over 90%) using the car as their main mode of transport.

3.2 Statutory consultees' response

Two statutory consultees responded to the consultation to reduce speeds on defined sections the A4. These included:

- South Central Ambulance Service remain in favour of the proposals.
- Thames Valley Police (TVP) are satisfied to approve the speed limit changes to all sections, except Section 4 (Colnbrook by-pass), as sufficient speed data was available. However, TVP have presented an alternate approach for Section 4 which is to introduce a temporary traffic regulation order to test the approach before making permanent.

3.3 Summary of overall responses

Most respondents did not want changes, they did not want a speed reduction for sections 1, 3 and 4 and wanted to retain the speed limit for sections 2 and 5.

Section	Support	Not sure	Do not support	Not answered
Section 1: Between the western borough boundary near Huntercombe Lane North / South and the junction with Twinch Lane / Galvin Road – reduce speed limit from 40mph to 30mph	15.97%	2.5	77.31	4.2
Section 2: Between the junction with Twinch Lane / Galvin Road and Fox Road – retain existing 30mph speed limit	78.65	9.24	21.01	4.2
Section 3: Between Fox Road and the Colnbrook By-Pass near Sutton Lane – reduce speed limit from 40mph to 30mph	18.49	2.52	74.79	4.2
Section 4: Between the Colnbrook By-Pass near Sutton Lane and Lakeside Road – reduce speed limit from 60mph (national speed limit) to 40mph	15.97	6.72	87.73	4.2
Section 5: Between Lakeside Road and the eastern borough boundary at the M25 bridge – retain existing 50mph speed limit	71.43	10.08	14.29	4.2

Table 1 Objections summary per section

Objections to the scheme can be found in full in Appendix 2 which includes officer response(s) to the specific points raised. The key themes that emerged through this consultation include:

- The need for a better **use of funds**. The Safer Roads Fund scheme is fully funded by a central government grant and to be used to reduce the number and severity of accidents occurring on the A4. Funds will be managed in line with all financial and procurement requirements.
- Comments included a **lack of accident data** to prove the case, however, this scheme is proposed as a series of road safety interventions to *prevent* accidents occurring or reducing the severity of accidents should a collision occur. The A4 was identified as one of the 50 most unsafe roads in the country, based on an evaluation of risk by the Road Safety Foundation. There is a proven relationship between

motor vehicle speed and the number and severity of injuries and collisions¹. The proposed speed changes therefore represent a step toward influencing driver behaviour and establishing 30mph as the default speed along the A4.

- An underused **bus lane** on the A4 was mentioned. While outside the scope of the Safer Roads Fund project, the bus lanes are part of a package of measures that will encourage take up of sustainable modes. All modes must be balanced across the road network to meet the needs of residents. Improving bus services offers an important means to reduce congestion in Slough however, bus services are a commercial concern and Operators will choose to run a bus service if it is profitable. Officers are continuing to look at ways that bus services can be improved where funding permits, working with Operators through the Bus Services Improvement Plan and Enhanced Partnership.
- **Enforcement** was considered a means of raising revenue for the Local Authority. Thames Valley Police enforce speeding and retain any revenue raised through speeding fines. The SRF scheme includes measures such as installing enforcement infrastructure (cameras) to aid compliance.
- The scheme's potential contribution to increased **air pollution** was raised. Research into lower speeds has identified that stop/start driving conditions (from high speed to lower speed) could increase pollution through wear and tear of tyres however many variables impact on pollution levels². It is essential to note that lowering speeds on the A4 will support the strategic aim of reducing congestion, and instil confidence in people to cycle and walk for their shorter journeys. The health benefits of slowing traffic to encourage active and sustainable travel choices is greater than any disbenefits occurring as a result of increased congestion levels.

A speed reduction would be supported by additional engineering and enforcement measures. While these measures are being designed, temporary Vehicle Activated Signs will be deployed to ensure motorists are aware of any agreed change to speed limits.

4.0 Strategic alignment

4.1 Corporate and Recovery Plan

A series of road safety engineering measures will be introduced to include speed limit reviews, enforcement solutions (i.e. installation of cameras), and upgrades to crossing facilities, road surface treatment and removal of roadside hazards including decluttering. These improvements will also complement the A4 cycle scheme currently being designed through the introduction of measures that seek to reduce risk for all road users.

Delivery of the SRF project will contribute to the overarching reduction in Killed and Seriously Injured (KSI) in the borough. In addition, the scheme will uphold the following Corporate and Recovery Plan priorities including:

- ***A council that lives within our means, balances the budget and delivers best value for service users, taxpayers*** by using external funding and applying this effectively to deliver best value that contributes to the support, delivery and monitoring of safe and sustainable transport infrastructure.

¹ Brake, Road Safety Charity, speed and injury

² Transport for London, Achieving lower speeds: the toolkit,

- ***An environment that helps residents live more independent, healthier and safer lives*** by reducing danger on the network, improving the reliability of the network and supporting increased take up of sustainable modes of transport.
- ***A borough for children and young people to thrive*** by implementing and maintaining road safety measures that delivers safer crossing points, reduced speeds and encourage our young residents to walk and cycle more
- ***Infrastructure that reflects the uniqueness of Slough's places*** by supporting sustainable growth and regeneration that includes removing dangers, enhancing transport options and enabling safe movement through the borough.

4.1 Local Transport Plan

Improvements to road safety would enhance east-west active travel links in the Borough, helping to reduce reliance on personal car use, and create safe and improved walking and cycling routes for our residents.

The scheme is supported by wider local Council policy including the **Local Transport Plan** where local sustainable modes and road safety are prioritised and congestion mitigated. Slough's more recently developed **Transport Vision and Strategic Infrastructure Implementation Plan (2020)** describes priorities relating to the need to mitigate rising congestion levels that are stifling local economic growth. Making sustainable transport the first choice of transport and creating environments which put people first in terms of movement and space, are key objectives. This scheme is aligned with these.

5.0 Implications of the Recommendation

5.1 Financial implications

The Council is in receipt of the SRF grant funds to a total value of £1.7m for the A4 route. The finance team will be engaged throughout the delivery programme in line with the monthly capital budget monitoring process.

Any financial risks will be addressed to avoid, mitigate or reduce risk. Where this is deemed not possible, the scheme's scope will be reduced to lower costs without significantly compromising the core outcomes. Any required changes will be agreed with the DfT.

The proposed strategy for delivery of the construction phase of the scheme will be through the Council's Direct Service Organisation (DSO).

There are no ongoing revenue implications and where possible the project will seek to reduce maintenance liabilities by removing infrastructure that is repeatedly damaged.

There is budget within the capital programme for the expenditure of £1.7m on the scheme, assumed fully funded by the grant as outlined above. Currently this has been rephased such that £0.2m is budgeted for 2022/23 and £1.5m for 2023/24. Should more be required in 2022/23 then budget will be drawn from the 2023/24 period.

5.2 Legal implications

- The Traffic Management Act 2004 (Section 16(1)) imposes a Network Management Duty to ensure that Slough Borough Council secures the expeditious movement of traffic on the authority's road network and facilitates the expeditious movement of traffic on road networks for which another authority is the traffic authority.
- The Council must have regard to the statutory guidance issued by the Secretary of State for Transport under section 18 of the Traffic Management Act 2004 to deliver their network management duty under the Traffic Management Act 2004. This includes guidance on engagement and consultation. Accessibility requirements and the Public Sector Equality Duty apply to all measures, both temporary and permanent. In making any changes to their road networks, authorities must ensure that elements of a scheme do not discriminate, directly or indirectly and must consider their duty to make reasonable adjustments anticipating the needs of those with protected characteristics, for example, by carrying out equality impact assessments on proposed schemes. Engagement with groups representing disabled people and others with protected characteristics should be carried out at an early stage of scheme development.
- Road Traffic Act 1988 Section 39(2), Traffic Signs Regulations and General Directions 2016. To prepare and carry out a programme of measures designed to promote road safety.
- The consultation must be at a time when proposals are still at a formative stage. The Council must give sufficient reasons for any proposal to permit of intelligent consideration and response. Those consulted should be aware of the criteria that will be applied when considering proposals and which factors will be considered decisive or of substantial importance at the end of the problem. Adequate time must be given for consideration and response. The product of consultation must be conscientiously taken into account in finalising any statutory proposals.
- The Equality Act 2010 enacts a single general public sector equality duty (PSED) under section 149, which applies to public authorities exercising public functions.
- All service contracts over £100,000 must be sealed and contract documentation will be reviewed by HB Public Law.
- All the Traffic Regulation Orders and Notices required for the proposals will be made under the Road Traffic Regulation Act 1984 and all other enabling powers.

5.3 Risk management implications

<i>Description of risk</i>	<i>Risk/Threats/Opportunities</i>	<i>Proposed future controls</i>
Procurement	<p>The Tender prices may exceed budget allocation available.</p> <p>Delays to the construction programme or contractor default</p>	<p>This risk will be actively monitored and managed and any significant changes to the scope of the programme will reported to the Lead Member, Senior Management and the DfT</p> <p>Appoint an established contractor with proven financial probity via a robust procurement process. Progress against the project programme to be scrutinised by project manager/board.</p>
Finance	<p>The total allocation remains at £1.7m. With revisions to the programme and outputs, costs may exceed this total. Inflation due to national/international events may impact costs.</p>	<p>Ongoing communication with the DfT will be undertaken to advise of agreed measures to be contained within the funding envelope.</p> <p>Appropriate project management and robust cost estimating will ensure that costs are as indicated and there is flexibility within the scheme to reduce the number of countermeasures used or to reduce the scope and associated costs of the scheme.</p>
Scheme delivery team capacity	<p>Delays during design stage</p> <p>Lack of resource within Slough DSO to install scheme</p>	<p>Designs will be separated out for different functions to avoid overloading one contractor/consultant.</p> <p>Major Project scheme delivery forecast to reduce by December 2022 and releasing capacity in DSO to deliver future works. Works will also limited to minor works such as kerb and preparation for traffic signals etc.</p>
Community Support	<p>Unfavourable response to wider public consultation</p>	<p>Programme allows for detailed design to be modified where necessary to meet specific objections. However, some objections cannot be overcome such as speed limits. These will be managed through good Communication with councillors and residents.</p>

Table 2 Risk Management

5.4 Environmental implications

The SRF scheme is expected to reduce congestion through improvements to signals phasing and will be delivered in a parallel with the A4 cycle scheme currently in development. Of note is that lowering speeds on the A4 will support aims of reducing congestion, by instilling confidence in people to cycle and walk for their shorter journeys. The health benefits of slowing traffic to encourage active and sustainable travel choices is evident (NICE, guidance, active travel). Making the A4 a consistent 30mph will result in fewer accelerations and decelerations, so contributing to an improved environment. Previous research into lower speeds (Transport for London) identified that stop/start driving conditions (from high speed to lower speed) could increase pollution through wear and tear of tyres.

5.5 Equality implications

SBC recognises its duties under the Equalities Act 2010 an Equalities Impact Assessment must be prepared as part of the scheme development process under section 149 of the Equality Act 2010 (EqA 2010)

An initial Equality Impact Assessment has been undertaken (Appendix 3), that will be further developed as the scheme progresses to identify, and mitigate against any potentially adverse equality impacts arising in the work programme.

The scheme's intention is to reduce inequalities in mobility to better cater for safe and equal access to key amenities for all users. Currently, the streetscape of the A4 is dominated by an overreliance on the private car, with wide carriageways carrying high levels of traffic; subsequently, reducing journey ambience for pedestrians and cyclists. Similarly, the quality of, and access to bus facilities for bus passengers require improvement. To address this, the SRF recognises that vulnerable road users are at higher risk of danger and therefore prioritises pedestrians and cyclists, followed by public transport users and then motorists; the scheme would address this through redefined road-space, regulating driver behaviour and improving pedestrian and cycling facilities amongst other related measures.

5.6 Procurement implications

The Council does not intend to outsource project work to third parties beyond specialist activities for design measures such as using cameras for enforcement purposes. Where possible, the Council will take advantage of new technologies and innovations in the market relating to these types of road safety measures. A full procurement exercise will be undertaken to ensure continued value.

For procurements with an anticipated value above £25,000, a detailed business case will be prepared and submitted for review to the board consisting of Procurement, Legal and Finance representatives before submission for approval following the Application and Authorisation table contained within the Contract Procedure Rules

5.7 Workforce implications

There are no workforce implications

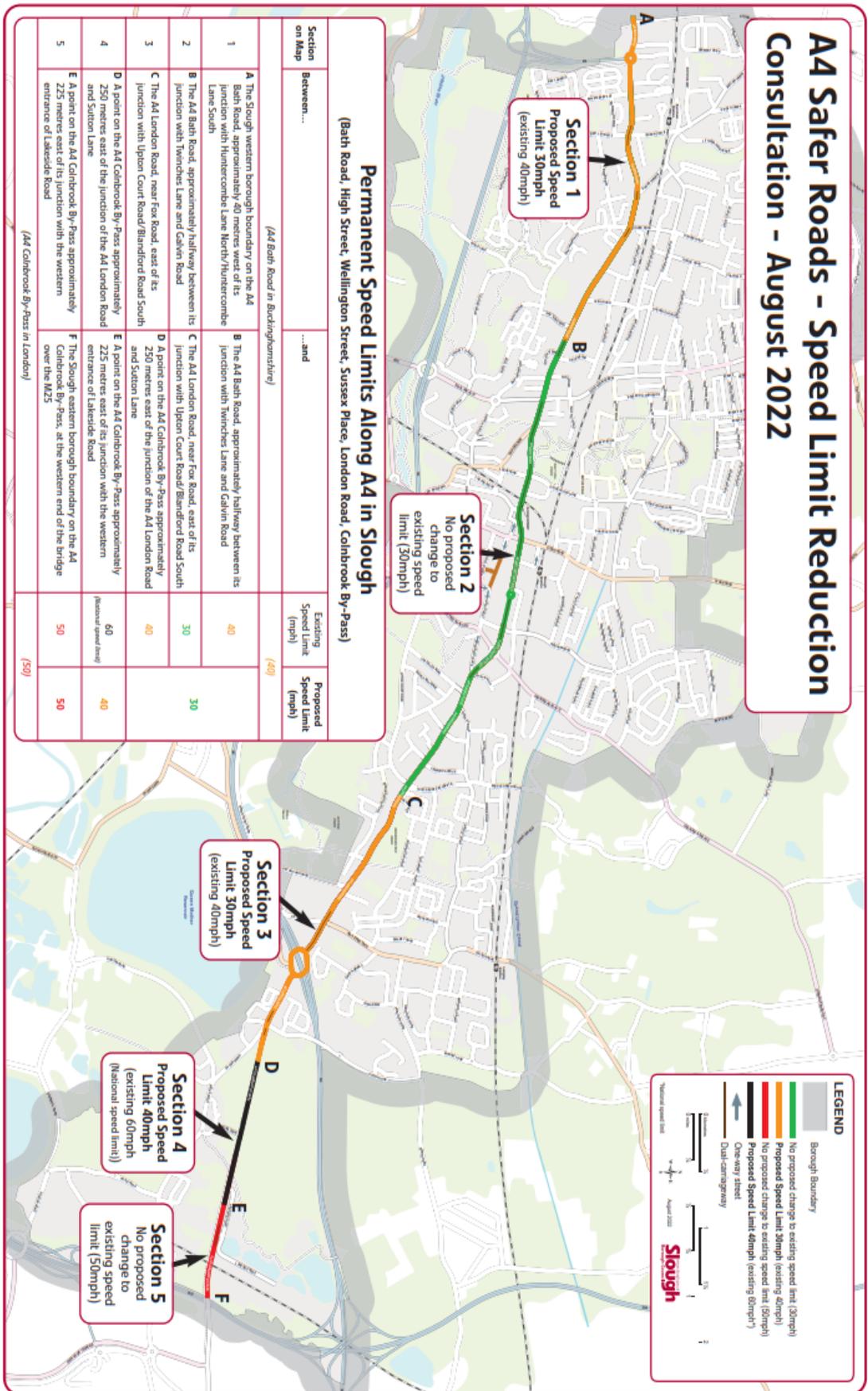
5.8 Property implications

None

6.0 Background Papers

Transport for London, Achieving lower speeds, the toolkit
IRAP toolkit – safer roads treatment <https://toolkit.irap.org>
Safer Roads Fund, Road Safety Foundation:
<https://roadsafetyfoundation.org/project/safer-roads-fund/>

Appendix 1: Speed reduction proposals, consultation map



Appendix 2: Objections to speed reduction proposal (5 sections of A4)

Statutory Consultee Responses	Officer comments
<p>South Central Ambulance Service No objections, SCAS support this application.</p>	<p>Thank you for responding</p>
<p>Thames Valley Police (TVP)</p> <p>Section 1: A4 Bath Road reduction of the speed limit to 30mph. The speed data tends to support that good conformity will be achieved. TVP will not oppose the proposal.</p> <p>Section 3: A4 London Road reduction of speed to 30mph. Speed data indicates the average speed is in line with current DfT guidance on setting local speed limits. However, the 85% shows that conformity maybe an issue. At this time TVP will not oppose the proposal but recommend monitoring after installation of the limit and consideration should be made to engineering solutions to achieve conformity rather than relying on enforcement to achieve the aims.</p> <p>Section 4: A4 Colnbrook By-pass reduction in speed to 40mph. There is no speed data relevant to this section of road. The speed data provided is relevant to the 50mph limit already installed and shows good conformity. At this time without any relevant data TVP will have to oppose the introduction of a 40mph limit as it is unlikely that without any major infrastructure changes to the nature of the road or repairs to the existing infrastructure to bring it up to standard that a statistically significant reduction of collisions could be achieved. However, TVP are concerned about the Colnbrook By-pass and want to work with Slough TA to achieve safer roads but have raised safety issues around the nature of the road, maintenance around central islands, lighting and markings. TVP suggest the introduction of a temporary speed limit of 40mph under Road Traffic Regulations Act 1984, section 88, in the interest of safety. This order can be in place for 18 months and can be made permanent if</p>	<p>Thank you for your comments and we look forward to receiving further comments and discussion in due course</p> <p>Section 4: This scheme is based on the removal of risks to reduce the severity of any collisions. Additional and proportionate measures will be introduced if identified through the IRAP model. We will continue to fully engage with TVP and will introduce appropriate measures.</p> <p>Road maintenance is outside the scope of this project, although surface treatments have been identified in IRAP as one measure that could be deployed.</p> <p>Thank you for your suggestion around the introduction of a temporary speed limit to assess the impact of the change. This will be considered in collaboration with TVP and introduced if appropriate.</p> <p>The Council is committed to working with its partners to improve Road Safety. This scheme relates to removal of risks and hazards and the evidence used for assessing this is not the same as our usual Road Safety approach.</p> <p>Measures to ensure the scheme is self-explaining and compliance will be assessed, costed, and deployed where appropriate.</p>

Statutory Consultee Responses	Officer comments
<p>necessary. Speed limits cannot be made under experimental orders, section 3 RTR Act 1984 prevent this.Or alternatively a 50 mph limit, joined up to the existing limit may have positive results.</p> <p>Speed limits should be evidence based, self-explaining and encourage self-compliance.</p>	
<p>Surrey County Council We have no objection to your proposals as set out in the consultation material.</p>	Thank you for responding

Other responses	Officer comments
<p>Two respondents felt that the bus lanes should be 24hrs because some drivers use the bus lane to 'undertake' when it is not in operation and such incidents may increase with a slower maximum speed?</p>	<p>Initial experience of 24hr operation led to a review. A paper was considered at Scrutiny Committee and a decision was made at Cabinet in January 2022 to move to part time only. This aspect will be kept under continual review.</p>
<p>Two respondents felt that there is no evidence that shows the existing speed limits contribute to accidents or safety hazards. No data has been supplied.</p> <p>One stated that we should use accident black spot data to inform our decisions</p> <p>One respondent felt that the design of the road is perfectly safe to keep the existing speed limit.</p> <p>One respondent questioned whether the SMART motorway work and the numerous closures of the M4 has seen increased use of the A4 and whether this is responsible for the accidents/collisions during the study period.</p> <p>Two respondents felt that the scheme would not achieve its objective of making the A4 safer.</p> <p>Two respondents thought that reducing the speed limit wasn't necessary but gave no reason.</p>	<p>The Safer Roads Fund was announced in the Government's 2016 autumn statement to improve the country's 50 most dangerous 'A' roads.</p> <p>The roads were identified in the Road Safety Foundation's report 'Making Road Travel as Safe as Rail and Air', which classed the A4 in Slough in the national list of 50 high-risk roads, using data supplied by the Road Safety Foundation.</p>
<p>Fourteen respondents felt that reducing speed limits will increase journey times</p>	<p>The scheme is intended to balance the needs of all road users, not just motorists.</p>

Other responses	Officer comments
<p>and the volume of traffic on the road at any one time, increasing pollution. Idling vehicles increase the level of pollution.</p> <p>Of these, two thought this would build frustration which would lead to more accidents</p>	<p>Making the A4 a consistent 30mph will result in fewer accelerations and decelerations which contributes to an improved environment and align to our strategic objectives to support sustainable travel options.</p>
<p>One respondent noted that the speed limit proposals do not result in fewer motorised vehicles.</p>	<p>The purpose of this proposal is to improve the safety of the road for all road users</p>
<p>Three respondents commented that the bus lane is not used.</p> <p>Two commented that the poor frequency of buses, the time bus travel takes, and the lack of destinations served by buses is insufficient to encourage motorists to change their travel behaviours.</p> <p>One wanted bus frequency to increase by 4x and for the bus service to be free, feeling that running a car was cheaper than using a bus</p> <p>Two commented that the bus lane is a shambles with one of these feeling that it was a particular problem for the school run and in rush hours</p> <p>One specifically identified that the Bus Lanes had significantly increased the time that it gets to work and that public transport was currently not a viable alternative as it required 3 different buses or 4 trains</p> <p>One cited that a 15 minute journey to the Doctors now takes 40 minutes since the introduction of the bus lanes</p>	<p>Bus services are a commercial concern and Operators will choose to run a bus service if commercially viable.</p> <p>This is more likely to be the case where travel times are reduced and are reliable – this is a key objective of the bus lane.</p> <p>We are continuing to look at ways that bus services can be improved through the Bus Services Improvement Plan and Enhanced Partnership</p>
<p>Two respondents felt that the reduction of speed on the main arterial route will lead to motorists using other routes, leading to traffic congestion, increased air pollution in residential areas and more accidents in those areas where there is greater density of population including safe routes to schools being adversely affected.</p>	<p>Motorists have the option of using the M4 if they wish to travel at higher speeds.</p> <p>The A4 remains a local road, where all road users' needs must be balanced.</p> <p>Reducing speed on the A4 will not prevent motorists from using this route.</p>
<p>One respondent felt that the introduction of bus lanes was driven by a desire to secure income via traffic cameras rather than being a proper attempt to change people's</p>	<p>The introduction of bus lanes are completely in line with the Council's Bus Service Improvement Plan (BSIP) which is</p>

Other responses	Officer comments
behaviours to use other means of public transport or active travel.	aimed at improving use of buses as part of a sustainable approach to transport.
Two respondents felt that the reduction on speed limits was designed to increase revenue by charging for speeding offences	Enforcement of speed limits is undertaken by the Police. Introducing a consistent speed on the A4 will make the route clearer and easier to understand. SBC does not receive any funding in relation to speeding offences.
Two respondents noted that road safety could be improved by better design of the road layout such as reducing the number of uncontrolled right-hand turns, reduce the road to one lane on one side and putting traffic calming measures in place.	Reducing the speed limit is part of the solution. Redesigning road layout could also contribute to improving safety and measures other than reducing speed limits will be proposed to improve road safety on the A4 that are within the scope and funding for this project.
Two respondents felt that all that we would achieve would be to anger the public	It is essential that all road users are protected, and their needs balanced.
One respondent, who drives for a living and has no choice what times the car is driven, felt that reducing the speed limit would worsen congestion and noted that all the surrounding roads were heavily congested at peak times.	<p>The scheme is intended to balance the needs of all road users, not just motorists. This proposal does not prevent motorists from using the A4, it introduces a consistent speed to reduce the number and severity of any collisions.</p> <p>Congestion remains a problem in the borough that we are trying to address through providing a range of sustainable travel options.</p>
<p>One respondent felt that we should allow faster speeds at quieter times as fuel consumption is less efficient at speeds below 60mph</p> <p>One asked that we make sure speed limits are policed as it sounds like a racetrack at night.</p> <p>One suggested that introducing lower speed limits would put those who complied in danger because others wouldn't slow down.</p> <p>One asked what guarantee is there that people will adhere to the new speed limit</p> <p>Three respondents welcomed reduced speed limits. This will stop fast erratic driving.</p> <p>One respondent requested more enforcement.</p>	<p>Enforcement of speed limits and other driving offences is undertaken by the Police.</p> <p>Introducing a consistent speed on the A4 will make the route clearer and easier to understand.</p> <p>The Council does not receive revenue from speeding enforcement.</p>

Other responses	Officer comments
<p>Speed alone does not cause accidents. Quality of driving, using mobiles and unlicensed vehicles are also a problem</p>	
<p>Four respondents felt Slough has a poor traffic / road system which was holding back Slough</p> <p>One of these stated that it is no longer viable to operate their business as customers don't now come into Slough.</p> <p>One felt that trade now goes elsewhere along the M4 and avoids Slough</p>	<p>SBC has set out strategic objectives to support sustainable travel options.</p> <p>We are developing an Economic Development Strategy to attract businesses and customers to slough.</p>
<p>One respondent suggested air quality monitoring, noting that this needed to take account of air traffic, both before and after implementation.</p> <p>One felt that there was no evidence that slower speeds benefited air quality and that cars stood stationary was worse for local air quality</p> <p>One suggested that the statistics that SBC has regarding pollution was taken during the lockdown and doesn't reflect the reality.</p>	<p>Air Quality is continuously monitored and will be modelled for this scheme and other transport schemes to measure impact.</p> <p>The reduction in speed limit is part of making the A4 safer when there is free flowing traffic</p>
<p>One respondent suggested the introduction of cameras at box junctions to incentivise considerate driving citing the yellow box junction at Langley High Street / London Road as a good location to have such a camera.</p>	<p>The outcome of the scheme will be monitored. The potential use of cameras to prevent junctions from being blocked will be explored.</p>
<p>It is important road users can clearly see the new speed limit with plenty of signage.</p>	<p>The scheme will be consistently signed and marked.</p>
<p>Six respondents felt that, given the Councils financial position, that the money should be spent on something else</p>	<p>The Safer Roads Fund scheme is fully funded by a central government grant and to be used to reduce the number and severity of accidents on the A4.</p>
<p>If we had fewer cars on the road there would be fewer injuries</p> <p>Two respondents thought we need strategies to accommodate more cars on the road. One of these felt that very few people wanted to cycle.</p> <p>Two respondents said that they would use their car no matter what</p>	<p>SBC are working to reduce car usage and to encourage alternative means of travel but the aim of this scheme is to save lives</p>

Other responses	Officer comments
Accidents at 30mph still injure people	Yes, but significantly less so than at higher speeds.
One respondent felt that this would encourage people to use the M4	Motorists wishing to travel at a faster speed should utilise the M4.
Two respondents asked that SBC consider removing the bus lanes from parts of the A4	SBC has set out strategic objectives to support sustainable travel options.
One respondent whether SBC took account of consultation responses	All consultation responses have been considered, are summarised in this appendix, and will be discussed before Cabinet make their decision
One respondent complained that the road works in Langley Village and Brands Hill have taken too long, and that road works themselves cause delays and pollution	There are many factors to take into account when carrying out road works but it is everyone's interest that the shortest practicable time is taken to complete them
<p>One respondent requested that the A412 Uxbridge Road have a reduction of the current speed limit from 40mph to 30mph.</p> <p>One respondent requested 20 is plenty for Colnbrook</p>	<p>The A4 was identified in the Road Safety Foundation's report 'Making Road Travel as Safe as Rail and Air', which classed the A4 in Slough in the national list of 50 high-risk roads, using data supplied by the Road Safety Foundation. Government funding is for these 50 priority locations.</p> <p>Safety on the A412 Uxbridge Road will be kept under review, along with all roads in Slough.</p>
One respondent requested lower speed limits on the section between Lakeside Road and the M25 and a 24hr bus lane along the Colnbrook by-pass	The Council will continue to evaluate speeds and demand for bus infrastructure before it can determine whether the speed limit and a bus lane can be introduced on the by-pass.

Appendix 3: Initial Equality Impact Assessment

Directorate: Place	
Service: Place and Communities – Transport / Road Safety /	
Name of Officer/s completing assessment: Misha Byrne	
Date of Assessment: 18 November 2022	
Name of service/function or policy being assessed: Safer Roads Fund, Speed Reduction on defined sections of the A4.	
1.	<p>What are the aims, objectives, outcomes, purpose of the policy, service change, function that you are assessing?</p> <p>The government grant funded Safer Roads Fund (SRF) grant totals £1.7m. The Department for Transport invited proposals from eligible local highway authorities to improve safety on specific sections of local ‘A’ roads where the risk of fatal and serious collisions is highest. The analysis was undertaken by the Road Safety Foundation that identified within Slough the following roads were eligible:</p> <ul style="list-style-type: none"> • The A4 through the borough, between junctions 5 and 7 of the M4. <p>The aim of the Safer Roads Fund scheme is to reduce death and serious injury on the A4, through a systematic assessment of risk and identifying hazards on the route that can be addressed by the introduction of a range of road safety measures and improvements.</p> <p>The SRF presents an opportunity to establish a pro-active strategic approach to route improvements. The SRF is a new approach to contributing to the Council’s road safety work and mitigating the hazards identified by the Road Safety Foundation. This approach differs from the Council’s usual road safety approach which is to target limited funding to address ‘accident hotspots’. The SRF grant enables officers to take a holistic overview of risk and mitigate these at source to reduce the severity of accidents.</p> <p>Road safety improvements remains critical to improving the perception of the borough’s roads to enable greater take up of use of sustainable modes particularly walking and cycling. Traffic accidents continue to contribute to increased congestion which can hinder economic productivity. Potential benefits of the scheme includes creating a more inclusive environment and reducing road danger with the potential to enable more people to participate in active travel.</p> <p>The scheme is supported by wider local Council policy including the Local Transport Plan where local sustainable modes and road safety are prioritised and congestion mitigated. Slough’s more recently developed Transport Vision and Strategic Infrastructure Implementation Plan (2020) describes priorities relating to the need to mitigate rising congestion levels that</p>

	<p>are stifling local economic growth. Making sustainable transport the first choice of transport and creating environments which put people first in terms of movement and space, are key objectives. This scheme is aligned with these.</p> <p>The safe movement of people on the network has long been a priority in order to deliver an integrated, sustainable transport solution in and across the borough.</p>
2.	<p>Who implements or delivers the policy, service or function? State if this is undertaken by more than one team, service, and department including any external partners.</p> <p>The SRF is a shared programme in terms of design stages and partnership working although Slough Borough Council, Transport team will deliver the SRF.</p> <p>Subject to feasibility, funding and consultation, the proposed measures will be delivered jointly, thorough a working group including external partners such as Thames Valley Police, emergency services and the Road Safety Foundation. However, ultimately, Slough Borough Council has responsibility for leading the development of the design and submission to the Department for Transport (DfT) for approval.</p> <p>The development of the SRF will be overseen by the Transport team in the Place directorate, working closely with Highways colleagues. Responsibility for regular progress reviews, liaising with the partners and stakeholders and all related administrative activities lies with the Transport team.</p> <p>The DfT is responsible initially for reviewing the proposals alongside the Road Safety Foundation. Subsequently, the DfT will also be reviewing scheme specific proposals that will be set out. Funding has already been set out to facilitate the delivery of the proposed schemes and measures.</p>
3.	<p>Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.? Please consider all of the Protected Characteristics listed (more information is available in the background information). Bear in mind that people affected by the proposals may well have more than one protected characteristic.</p> <p>SBC will work closely with the Road Safety Foundation for much of the analysis. The measures being proposed have not at present involved the local community as much of the improvements are unlikely to require material change to the road. Where new signals and Traffic Orders are suggested then they will be consulted on in the design stage.</p>

The consultation materials will be available on SBC's website consultations pages and hard copies available if required. Local groups with an interest in these improvements will be consulted.

In particular the measures are intended to lower speeds and provide more forgiving roadside infrastructure in the event of an accident. There will be some specific improvements for pedestrians and other vulnerable road users, including those with visual or mobility impairments. The overall expectation is that this proposal will lead to improvements for all who use the A4 in Slough, with wider benefits for all. However, it is acknowledged that road safety improvements are required to protected vulnerable road users and relied upon by certain protected groups more than others. The relevant groups are expected to be affected as follows:

Age:

A more inclusive street environment and reducing road danger has the potential to enable more people to participate in active travel. Children are particularly impacted by poor air quality at the roadside and also vulnerable to road danger.

Race:

Ethnic minority groups are over-represented in indices of deprivation and more likely to be exposed to transport related harmful impacts such as traffic collisions, poor air quality and health inequalities.

Disability:

Public realm/road network has the effect of excluding disabled people. The proposal will seek to address this for example by establishing clear pedestrian crossing points, or a safe cycle route with improved crossing points can improve mobility and access for disabled people.

Lower Income Groups:

This group is less likely to be working from home, less likely to have access to a private vehicle and so more likely to need to walk/cycle in a safe environment.

Pregnancy and maternity:

There may be some specific impacts for this category, relating to access to healthcare and facilities for parents and also young children, particularly as pedestrians.

Religion and Belief:

Generally speaking, there are no specific impacts here. However, there may be some impacts, including better access to places of worship.

Gender Reassignment:

No specific impacts associated with this category.

Marriage and Civil Partnership:

No specific impacts associated with this category.

Sex:

No specific impacts associated with this category.

Sexual orientation:

No specific impacts associated with this category.

4. **What are any likely positive impacts for the group/s identified in (3) above? You may wish to refer to the Equalities Duties detailed in the background information.**

The proposed changes will provide safe and affordable travel options to people from all demographic and socio-economic backgrounds. This is essential in improving equity in access to transport. Motor vehicle movements will change as a result of enforcement, educational and engineering measures once the SRF scheme has been completed. The intended benefits include a change in traffic movements and flow, with an associated improvement to air quality. Also, an expected improvement to an individual's ability to move through the area safely and improved access to sustainable modes.

The short, medium and long term outcomes for all groups have been tabled below.

Program: Safer Roads Fund Bid, A4 Slough **Logic Model**

Situation: The A4 in Slough between junctions 7 and 5 have been identified as being in the top 50 most high risk roads in England. Our proposal is to raise the iRAP star ratings for vehicle occupants and vulnerable road users (VRU) to three stars along the majority of this route. Following the safe system approach we propose to target killed and seriously injured casualties by eliminating potential high risk situations

Inputs (Resources)	Outputs		Outcomes – Impact		
	Activities	Participation	Short	Medium	Long
<ul style="list-style-type: none"> Project Manager SRO Project Board and regular meetings Slough Borough Council DfT Funding Slough Borough Council Capital Finance Board iRAP VIDA Tool RAPTOR Tool STATS 19 data and re-establishment of baselines in light of KSI reporting and CRASH Evaluation of risk provided by RSA 	<ul style="list-style-type: none"> Speed limit review Enforcement cameras Removal of Roadside hazards Update pedestrian crossing facilities to improve pedestrian compliance Surface rehabilitation to improve friction in key locations 	<ul style="list-style-type: none"> Project Board Council members Senior Officers of the council Thames Valley Police RSA Road users groups from the community 	<ol style="list-style-type: none"> Reduction in vehicle speeds Improved compliance with traffic signals by drivers and riders Improved crossing behavior by pedestrians Fewer shunt collisions Better safety perceptions for all road users 	<ol style="list-style-type: none"> Raise the iRAP star rating for vehicle occupants and VRU's to 3 stars along the majority of the route. Increase the number of sustainable journeys by cycle and foot Increased access to business premises 	<ol style="list-style-type: none"> Reduce the severity of collisions along the route Reduce the number of collisions along the route Fewer delays and improved journey time reliability Reduce damage to infrastructure Reduced vehicle emissions

Assumptions: Much of the work will be carried out in the first 18 months of the scheme; the individual proposals do not cover the entire length of the route; a different approach will be used according to the risks and mix of road users in each section.

External Factors: Other major projects are planned in the area over the coming months and are excluded from this bid. Enforcement levels are controlled by TVP

Impacts by Group

Age:

Improvements to safety and air quality will benefit children significantly through scheme improvements enabling a higher proportion of this group to cycle and walk to and from school in particular. Children are particularly impacted by poor air quality at the roadside and are also vulnerable to road danger, both of which the proposal aims to address. The proposals offer the potential for more physical activity, including play, in areas where facilities may be limited, offering the potential to address issues of obesity and well-being.

Race:

Ethnic minority groups are over-represented in indices of deprivation and more likely to be exposed to transport related harmful impacts such as traffic collisions, poor air quality and health inequalities. The proposal will help address these impacts while also improve access to active travel participation by improving the physical environment and reducing the perception of danger on the network that can be a barrier to take up of sustainable modes.

Disability:

Public realm/road network has the effect of excluding disabled people. The proposal will seek to address this for example by establishing clear pedestrian crossing points, or a safe cycle route with improved crossing points can improve mobility and access for disabled people.

For those that do have access to a car, or rely on taxis and carers, journey times should improve once the scheme has been implemented due to a reduction in the number and severity of accidents on the network.

Lower Income Groups:

This group is less likely to be working from home, less likely to have access to a private vehicle and so more likely to need to walk/cycle in a safe environment. The scheme will enable access to a safe network on the borough's most important route when accessing transport hubs (three rail stations and the bus station are all located within the vicinity of the proposed route). The scheme will improve equity in access to transport. Enabling safe travel is essential to allow lower income groups to access work, or back into work.

5.	<p>What are the likely negative impacts for the group/s identified in (3) above? If so then are any particular groups affected more than others and why?</p> <p>There are very few negative impacts anticipated for any of the groups identified above.</p>
6.	<p>Have the impacts identified in (4) and (5) above been assessed using up to date and reliable evidence and data? Please state evidence sources and conclusions drawn (e.g. survey results, customer complaints, monitoring data etc.)</p> <p>This initial EQIA has taken into account relevant and available data sources, including data from Census 2011 and ward data. The Local Transport Plan evidences the relationship between road safety, sustainable travel choice and access, as well as associated air quality impacts.</p> <p>Regarding other sources: The SRF scheme's proposal for a speed reduction has been undertaken. The SRF speed reduction survey did not evidence any issues relating to specific, protected groups but was primarily responded to by motorists using the A4. Further consultations will be issued as the scheme is designed in full and the results analysed.</p> <p>Responding to customer complaints and other correspondence are generally considered as part of the general Transport team duties. Any relevant points will be captured and referred to scheme designers to ensure consideration of specific concerns, however, the information here is not extensive and there are no major points of reference relating to any specific group.</p>
7.	<p>Have you engaged or consulted with any identified groups or individuals if necessary and what were the results, e.g. have the staff forums/unions/ community groups been involved?</p> <p>At this stage, only the speed reduction measure has been consulted upon. Staff forums were consulted in relation to the proposed A4 speed reduction measure. Future consultation related to the full scheme design will be directed at staff through the usual mechanism.</p> <p>Community groups have been sent information regarding the speed reduction, via email correspondence, with a request for any comments to be made. One particular group specifically targeted is schools, with head teachers having been contacted for this purpose.</p>

	<p>The intention is to engage further with as many relevant organisations and community groups as the full scheme is developed. This process is expected to continue until the detailed design for the scheme has been completed.</p>
<p>8.</p>	<p>Have you considered the impact the policy might have on local community relations?</p> <p>The SRF is expected to make a positive contribution here. Road Safety is an important aspect of the Borough's Transport Strategy. Road Safety interventions are essential in providing greater mobility and accessibility for all members of the community.</p> <p>The SRF will be designed to contain a comprehensive list of measures and proposals to have the overall effect of improving safety and accessibility within a key route for those travelling on east-west journeys in the town. This will be achieved through more reliable journeys, improved safety leading to increased cycling and walking levels and all associated benefits. All of these impacts are expected to be valued by the community, and specific community groups, as referred to in section 4.</p> <p>The expected benefits arising from the improved air quality, reduced carbon emissions, reduced congestion levels, will all be particularly valuable in terms of greater social and environmental sustainability. Better, more reliable access to jobs, education and shopping areas will all be expected to lead to greater economic sustainability, with positive implications for all within the various communities.</p>
<p>9.</p>	<p>What plans do you have in place, or are developing, that will mitigate any likely identified negative impacts? For example what plans, if any, will be put in place to reduce the impact?</p> <p>As throughout this review, there are currently no negative impacts anticipated for any protected group, or indeed all members of the public. It is possible that some changes may have some unexpected consequences, including some short term detrimental impacts during the construction phase, but this will be mitigated through careful planning and effective mobilisation and management of the Direct Services Organisation likely to be carrying out the work. Any negative impacts will be reviewed and addressed accordingly.</p> <p>Engagement with the public increasingly takes place via online communications, and the various websites run by the Council and the bus operators, and all other sources, will continue to play a vital role in the exchange of information and comments. However, as far as practically possible, greater input from community groups will be actively sought and welcomed by the Council, through current channels and new initiatives to be explored and implemented.</p>

10. **What plans do you have in place to monitor the impact of the proposals once they have been implemented? (The full impact of the decision may only be known after the proposals have been implemented). Please see action plan below.**

The reporting procedure for the SRF has not yet been fully finalised. It is probable that the Road Safety Foundation will be required to quality assure the completed works on behalf of the Department for Transport.

The current proposal is one year annual review will be appropriate to monitor the effectiveness of the programme. In addition, the Council will respond to all relevant guidance from the DfT, and will comply with all formal reporting requirements.

The success of the scheme implementation and associated measures will typically be subject to evaluation reports and regular monitoring, as well as discussion at partnership meetings.

In addition, the Transport team will oversee an ongoing review of the overall development and progress of the SRF scheme and all associated measures, including consideration of the perceived and actual impacts on the public – including, specifically, all protected groups.

What course of action does this EIA suggest you take? More than one of the following may apply	✓
Outcome 1: No major change required. The EIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken	✓
Outcome 2: Adjust the policy to remove barriers identified by the EIA or better promote equality. Are you satisfied that the proposed adjustments will remove the barriers identified? (Complete action plan).	
Outcome 3: Continue the policy despite potential for adverse impact or missed opportunities to promote equality identified. You will need to ensure that the EIA clearly sets out the justifications for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact (see questions below). (Complete action plan).	
Outcome 4: Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination. (Complete action plan).	

Action Plan and Timetable for Implementation

At this stage a timetabled Action Plan should be developed to address any concerns/issues related to equality in the existing or proposed policy/service or function. This plan will need to be integrated into the appropriate Service/Business Plan.

Action	Target Groups	Lead Responsibility	Outcomes/Success Criteria	Monitoring & Evaluation	Target Date	Progress to Date
To reduce speeds on defined sections of the A4.	All groups	Misha Byrne / Support from Road Safety Consultants and newly recruited SBC Road Safety Engineer	Reduction of number of Killed and Seriously Injured collisions on the A4, once complementary measures have been introduced. Increase in number cycling, walking and scooting.	Monitoring of Killed and Seriously Injured (KSIs)	31 March 2023	On course, subject to Cabinet approval
Design of SRF scheme measures	All groups	Misha Byrne / Road Safety engineer/	Scheme approval by Road Safety Foundation Approval by Lead Member	Scheme designed	July 2023	Planned
	All groups					

Implementation of scheme		Misha Byrne / Road Safety engineer/	Deployment and testing of all associated measures after consultation	Outputs delivered.	Complete December 2023	Planned (timeline subject to necessary procurement and legal sign off)
Monitoring of outputs			Annual follow up report	Outcome achieved	Completed December 2024	

Name: Misha Byrne

Signed:

(Person completing the EIA)

Name: 

Signed:

.....(Policy Lead if not same as above)

Date: