

Appendix C:- Summary of Formal Objections and Officer Responses

Ref	Objection	Number of objectors	Officer response
1	Want safer roads but this isn't the right way to go about it	2	<p>Introducing a 20mph speed limit on roads in residential areas has undergone extensive research through academia, DfT, TRL and on-site trials (including Bristol, Portsmouth, Oxford, Norwich, Leicester, Newcastle Colchester, Hackney, York). The results generally show that once drivers become accustomed to travelling at the reduced speed they adapt their behaviour and routines to the limit and it becomes socially acceptable. People living in the affected areas also notice environmental improvements to amongst many, the air quality and noise.</p> <p>Road accident numbers have been reduced significantly in some trial areas.</p>
2	Statement of reasons is exceedingly brief	1	<p>The Statement of Reasons is implicit, to the point and self explanatory. They include all the reasons for the proposed 20mph speed limit. The proposal is to introduce a measure which has minimal impact to the residents but is broad ranging in its effect.</p> <p>The road safety improvements include reducing the number and severity of road traffic accidents particularly to the young and elderly. Any changes to peoples behaviour including using their cars less frequently, walking and travelling by bicycle more regularly will be beneficial. Environmental effects can vary from lower carbon emissions, reduced noise, improved air quality to less car dominated surroundings.</p>
3	The 20mph speed limit is an unnecessary imposition as roads and vehicles are safer; and road accidents, deaths and injuries have been declining	1	<p>Road traffic accidents are still occurring in these areas and still need to be reduced. Twerton and Southdown are the first areas to be considered because they had the highest accident rate in the Bath city area. There was a total of 38 injury accidents with 45 casualties in the three year period 01.01.2008 to 31.12.2010. One accident resulted in serious injury to a pedestrian.</p>
4	The setting of a base speed limit of 20mph is an unbalanced proposal	1	<p>DfT current guidance encourages and supports Local Authorities to implement 20mph speed limits on streets which are primarily residential in nature. It is likely that this will become a DfT policy shortly.</p>

5	Driving at a lower speed will increase petrol consumption, air pollution, and noise will reduce the efficient operation of the modern car	3	After site monitoring following the introduction of 20mph speed limits at trials in other cities including Bristol and Portsmouth have not shown any detectable increase in pollution or fuel consumption. Once drivers become familiar with the 20mph speed limit they will select the correct gear and engine speed which is appropriate. Less fuel is used travelling at a slower speed when the correct gear is selected.
6	The reason given that a 20mph speed limit will encourage more people to walk and cycle is unbalanced as other factors such as topography have a strong bearing on vehicle journeys.	1	There are obviously many factors which affect peoples decision to use their motor car; topography, weather, cost, work habits being a few. It is considered that the safety of the roads and how people use them is a significant factor in the choice and this is one element that we have some influence. Trials carried out in Bristol have shown that where 20mph speed limits have been introduced the walking and cycling counts have increased. Many other areas where a 20mph speed limit has been introduced also report an increase in cycle and pedestrian numbers on the street.
7	Many vehicle journeys are made for reasons other than the risk of road traffic accidents	1	The decision why people use the motor vehicle to make journeys is complex and varies between individuals. It is realized that road traffic accidents is one of them but how great a factor it is unknown. Where vulnerable people are concerned it plays an important factor in their decision. If the risk of an accident can be reduced, which is the proposal of the 20mph limit, then it is considered a social benefit.
8	There is concern that the 20mph limit will not be enforced by the Police, or if it is it, the wrong drivers will be hit . If this is the case it will bring the Law into disrepute.	1	A document produced by ACPO summarises their views to 20mph and the Police. The enforcement of traffic law by the police should be guided by the principles of proportionality, targeting, consistency and transparency. The police service will support all appropriate speed limits where there is proven need, the limit is clear and motirists have the ability to comply.
9	If the lower speed limit achieves insignificant or no reductions in driving speeds, the forecast improvements in the Statement of Reasons (fewer accidents, more walking and cycling) will not be realized.	1	If the aims of the reduced speed limit are not achieved, then additional measures will have to be installed such as speed humps, chicanes; and extra funds will have to be made available to implement them.

10	Bus services and timetables will be affected by the lower speed limit, and this could have knock-on effect with fewer people using the buses.	1	Bus services should not be significantly affected by buses having to travel at a speed of 20mph or less. Any changes to a reduction in their maximum speed will be counterbalanced by their regular stopping and starting, and travelling at a regular more constant speed. The reduced speed limit will improve the flow of the traffic making it more fluid and regular as the gap between vehicles is shortened. Bristol's pilot 20mph speed limit scheme reported that bus service times and reliability were maintained.
11	Existing traffic calming measures are effective and roads where they operate don't need a 20mph speed limit	1	Existing traffic calming measures will remain as they are. Traffic tends to speed up and slow down between these calming measures. A 20mph speed limit would produce a more consistent and regular speed, less acceleration and braking, and thereby improve the flow of the traffic, and use less fuel with lower emissions.
12	Certain roads act in a traffic management capacity by providing convenient access routes to distributor roads. Leave a 30mph limit on these roads, Bridge Rd, Claude Av, Lymore Ter, Coronation Av, Sladebrook Av, Lansdown Vw, Lymore Av, The Hollow, Shophouse Rd, High St, Mill Ln, How Hill, Newton Rd.	1	These roads act in a traffic management capacity in that they are used as short cuts. Many people using these roads give very little or no consideration to the nearby residents whose houses front almost directly onto the road. The reduced speed limit is a means of improving the environment for those people who have to suffer the daily imposition of the transient motorist. Residents of Claude Road, Sladebrook Avenue, Lymore Terrace and others petitioned the Council to include their roads as part of the Twerton Southdown 20mph scheme, and which has now been done.
13	Many streets included in the proposal are cul-de-sacs and traffic speed is already below 20mph	2	The traffic using these streets will not therefore be affected by the proposal. These roads are included in the blanket cover to make the speed limit consistent throughout the area, which might otherwise be confusing to drivers. If roads were not included in this Order it would require additional signing and an additional cost.

14	People will be inconvenienced by having to travel at 20mph on roads which are appropriate for a faster speed.	2	<p>People living adjacent to these roads are inconvenienced by many of the passing motorists. They have no choice in how the road outside their property is used. The 20mph speed limit is giving some control back to these people and will improve the standard of their life. The inconvenience caused to the motorist must be worth the improvements to the residents of these properties. With the knowledge that there is an area wide 20mph speed limit, drivers can plan their journey accordingly.</p> <p>Roads may be suitable or appear more appropriate for vehicles to travel safely at a higher speed than 20mph but they are within residential areas. As such people need to accept that the 20mph speed limit on roads in built up residential areas is the norm on all roads in these areas.</p>
15	A blanket 20mph speed limit during school hours doesn't make sense. Roads with schools should operate a 20mph speed limit between 8am and 9am, and between 2.30pm and 4.0pm.	1	This 20mph speed limit proposal is intended to be more wide ranging than just its effect outside schools. It aims to include a larger number, mixture and age range of the local population. It also has sociological and environmental benefits to the area.
16	Traffic problems are caused by parking, rat runners, road condition; therefore target these specifically rather than with a blanket 20mph speed limit.	2	This is a cost effective means of improving a number of highway and environmental issues. It would be financially, sociologically and impractical to target these problems individually and separately.
17	A 20mph speed limit should not be blanket wide, it should be limited to schools/hospitals etc.	1	<p>20mph speed limits already operate on roads near schools and hospitals. They require additional traffic calming measures to enforce them.</p> <p>The proposal for this speed limit is more extensive than its benefit to schools and hospitals. It is intended that a greater number of the population benefits from its introduction.</p>
18	Money would be better spent carrying out maintenance	1	Road safety and road maintenance are both a prime considerations of the Council. Both these items will be addressed by reducing the speed of vehicles to 20mph. Fewer numbers of vehicles travelling at a lower speed will do less damage to the highway and thereby require less money for maintenance.
19	Additional signing and restrictions would be a distraction to driving	1	The additional signing should not be a distraction as it will be a part of the normal driving process. If it has any effect, it should make them more alert to their speed and environment and how they drive.
20	Waste of money	1	The money will not be wasted as its aims are for the reduction of road traffic accidents, improving the environment and encouraging more walking and cycling. All residents will benefit from the change.

21	Cause sign clutter	1	The Signs Regulations require that a speed limit is signed to a specific standard. The minimum number of signs will be installed to make the limit enforceable.
22	Limit will be unenforceable	2	Department for Transport Circular 1/2006 advises that 20mph speed limits should be self enforcing and that there should be no expectation on the Police to provide additional enforcement beyond their routine activities, unless this has been explicitly agreed. The scheme will therefore be self enforcing through the use of terminal speed signs at the entrance to 20mph speed limit areas, regularly installed repeater signs, and carriageway 20 repeater road markings.
23	Scheme can not be implemented within the current budget	1	The Cabinet has made a commitment that funds will be available to implement this scheme to budget.
24	Doesn't have Secretary of State approval	1	Legislation has changed. LAs no longer need Secretary of State consent to introduce 20mph speed limits.
25	No evidence that there is a need for the limit	1	The evidence is in the road traffic accident rate, air and noise pollution levels.
26	Roads treated as "primary residential" whereas they vary considerably in character	1	All the roads within the Twerton and Southdown areas are within the built-up area of Bath city. They may be different in character but are basically/primarily residential in nature where people use the area for recreation purposes, to live and to work.
27	Many people will unwittingly break the limit, as can result from the steep hills around Bath, and be classified as criminal	1	The council has carried out extensive public consultation and advertisement through an informal leaflet drop to the residents of Twerton and Southdown, and through the press. Drivers should be able to keep within the 20mph speed limit as the roads subject to the 20mph speed limit will be signed at the 20/30mph speed limit boundary and with repeater roundel signs at regular intervals throughout the area.

28	The informal consultation was flawed and inadequate. (Details of how or in what respect the informal consultation was flawed and inadequate were not specified)	1	The informal consultation was carried out through a postal leaflet drop to all the properties within the proposed areas of Twerton and Southdown. It was also publicised on the Councils web site and the press to reach the larger population of Bath and North East Somerset . The leaflet drop also had a questionnaire and asked for residents to make their views known about the proposals (see Appendix B). The informal consultation was followed up with the formal consultation, as part of the TRO process, where the proposals were advertised on street and through public adverts for three weeks.
29	Impact on journey times and add to congestion.	1	Results from monitoring of 20mph limits introduced in a Bristol trial do not show that journey times or congestion have been significantly affected. Journey times may increase slightly but this can be balanced against the improved traffic flow which should result when the gap between vehicles shortens.