

A summary of responses to Cheshire East Council's

# **Speed Management Strategy Consultation 2021**







# **Executive summary**

# Purpose of the consultation

In 2021 Cheshire East Council consulted on an updated draft of its Speed Management Strategy. The consultation sought feedback on the updated strategy which would be considered before approval by the Highways and Transport Committee in 2022. In total 916 consultation responses and engagements were received.

# Rating the strategy overall

Just over half of respondents agreed that the updated strategy:

- Will enable the council to provide a safe highway network across Cheshire East (58% agree, 27% disagree)
- Is clear (54% agree, 28% disagree)
- Should be adopted (53% agree, 32% disagree)

Just less than half of respondents agreed the updated strategy:

- Supports walking and cycling (48% agree, 34% disagree)
- Caters for all highways users (45% agree, 38% disagree)

# **Speed management – Overall**

Large majorities of respondents agreed that:

- Speed management criteria should be applied consistently across the Borough (82% agree, 12% disagree)
- Sites requiring speed management measures should be prioritised based on evidence (78% agree, 1% disagree)

# **Speed management – Introduce 20mph zones across Cheshire East**

A large proportion of feedback called for the introduction of widespread 20mph zones across Cheshire East to help achieve Active Travel ambitions – some felt the strategy should be proactive in achieving this. They felt:

- 20mph zones are required particularly in all residential areas, near schools etc.
- The council should not wait for accidents to happen before making changes

# Speed management - Consistency is important

Respondents emphasised that consistency when applying speed control measures is important, feeling different areas should not be treated differently because of political pressure, or because some areas are more proactive than others in requesting speed control measures. There is a perception some areas are treated differently to others e.g. Sandbach.

Respondents felt consistency is important:

- In the interests of fairness
- So that car drivers will not be confused by different rules when driving from one local area to the next

Some suggested that consistency across the borough might be difficult to achieve when sites are being prioritised based on evidence, pointing out these are somewhat contradictory statements.

# Speed management - Use of evidence is retrospective

Some felt the use of evidence to support the introduction of speed control measures is retrospective rather than proactive. They felt that such evidence does not exist for most streets in Cheshire East and would take a long time to collect. Instead, they felt speed control measures should proactively be applied across the borough as standard.

# Speed management – Take account of local views when considering speed control measures

Some felt local residents, Town/Parish Councils and Local Councillors know the area better than anyone else, and should be able to lobby for action on speed limits on their own roads based on their local knowledge and experience. They felt local communities should be given more influence when developing local speed limits, and that there are too many bureaucratic obstacles in the strategy to bringing in 20mph limits.

There were also calls for the council to work more closely in partnership with local councils on increasing speed management initiatives in local areas, with local councils in particular calling for greater use of Speed Indicator Devices (SIDs).

# 20mph and 40mph areas

Just over half of respondents agreed with the sections in the strategy on:

- 20 mph areas (56% agree, 36% disagree)
- 40 mph areas (55% agree, 25% disagree)

The key themes highlighted by respondents about 20mph and 40mph zones were:

- Local communities should be enabled to create 20mph zones more proactively
- 20mph zones should not only be considered in locations which are already selfcompliant – significant objections to this concept
- 20mph areas ought to apply to areas where there are high concentrations of vulnerable road users, regardless of current speeds. If speeds are kept at a higher level then Active Travel will be discouraged and therefore "the motorcar wins"
- The introduction of speed measures should be evidence based and consistent
- Cars dominate local environments
- The strategy is complex, contradictory, prescriptive and not flexible enough
- The strategy seems to be "anti-20mph".

# The 3 E's approach to speed management

Between 70% and 73% of respondents agree with each of the 3 sections of the 3 E's – Education, Enforcement, and Engineering (between 17% and 19% disagree).

# The prioritisation matrix

Levels of agreement that the right topics are in each of the categories of the prioritisation matrix were:

- Casualty reduction (82% agree, 8% disagree)
- Local concern (76% agree, 14% disagree)
- Neighbourhood engagement (73% agree, 14% disagree)
- Accessibility and capacity (66% agree, 14% disagree)
- Congestion (65% agree, 18% disagree)
- Amenity (59% agree, 14% disagree)

Some felt extra categories were needed in the prioritisation matrix when assessing an area for speed control measures, including measuring the amount of:

- Active Travel in an area, and how much it is desired in an area
- Near misses as well as actual collisions
- Car parking and bus stops
- HGVs and farm vehicles
- Cyclists and pedestrians
- Schools and hospitals
- Equine traffic

# **Exceptions**

Levels of agreement with each of the exceptions were:

- Buffer or shoulder zones (65% agree, 17% disagree)
- Air Quality Management Areas, AQMAs (64% agree, 22% disagree)
- Cross border roads (55% agree, 20% disagree)
- Planned developments (53% agree, 21% disagree)

Some felt four exceptions are already too many, and that further exceptions are not needed.

### **Conclusions**

#### A large consultation response

It is extremely positive to see such a large number of consultation responses – 916 in total. This emphasises the good efforts taken by the Highways Team to promote the consultation, but also indicates the strength of feeling towards the topic of speed control in Cheshire East. This certainly seems to be a topical issue at the moment, and as such may require further engagement in future with local Cheshire East stakeholders and communities.

#### Positive overall feedback

Overall feedback towards the strategy seems to be positive. It is very encouraging to see that a majority of respondents agree the strategy should be adopted (53% agree), though it is noted that a significant proportion disagree that it should be adopted (32%). This perhaps indicates that while the strategy is on the right track, it may need improving.

### **Introducing 20mph zones in Cheshire East**

The main feedback received about the strategy was that it should do more to introduce 20mph zones within Cheshire East, with some calling for all residential areas in Cheshire East to be made 20mph by default, such as has been done in other areas including Cheshire West and Chester.

Respondents felt this would benefit communities significantly and would help the council achieve its Active Travel aims – there is a clear sense from some that council policy should put the needs of other highway users above those of car users, and that implementing 20mph zones across Cheshire East as standard would be a good step towards those aims.

However, it should be noted that not all respondents want 20mph zones imposing across Cheshire East as standard – it may be that separate consultation on this single issue will be needed before such a policy can be considered.

#### The strategy needs to be more enabling

There was also comment from some that the strategy is too prescriptive, too bureaucratic, does not enable communities to impose speed control measures in their local areas, and does not work in partnership with local communities.

Some felt that rather than waiting for accidents to occur before making changes, or only applying limits in areas which already adhere to the speed limit, a more proactive approach was needed, perhaps with 20mph zones becoming the standard, rather than the exception.

Others were concerned that it would take too long to collect the evidence in local areas to make a case for the implementation of speed control measures, and felt this was a bureaucratic barrier to achieving Active Travel in local communities.

There was also concern that the strategy will consider speed control measures in an area if Active Travel, or person movement, was already high, but pointed out that until car speeds are slowed then Active Travel movement may not be as high as it could be – this may be a chicken and egg situation.

#### **Consistency Vs Enabling local communities**

There was also concern expressed about the need for the strategy to be consistent – some were afraid that if some areas implement speed control measures on request, and others do not, that this could lead to unfairness across the borough, as well as confusion for drivers moving from one area to another.

That said, there were clear calls from some stakeholders for the council to enable local communities to create 20mph zones more proactively, and for the council to work more in partnership with local communities on speed management. It seems clear that some communities in Cheshire East do want to be much more proactive about controlling speed in their communities, and many felt the strategy should enable this to happen much more than it does. How this is achieved whilst remaining consistent across the borough is another tricky challenge.

#### **Editing specifics in the strategy**

Generally speaking respondents were fairly satisfied with the specifics of the strategy, though a number of specific improvements for the prioritisation matrix and list of exceptions were suggested, and these specifics can be found within the main report.

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Report produced 17 March 2022 by the Research and Consultation Team, Cheshire East Council. Email RandC@cheshireeast.gov.uk for further information.

# Introduction

# Purpose of the consultation

In 2021 Cheshire East Council produced a draft Speed Management Strategy as an update to the one that was published in 2016.

The strategy set out a consistent approach which the council will take to managing speed on the highway network, and had been updated to:

- Take account of changing attitudes towards speed and traffic management, particularly since the covid-19 pandemic when people's habits and priorities have changed
- Provide a safer road environment for all
- Encourage more Active Travel within Cheshire East
- Increase transparency about the way the council will manage speed and traffic flow.

The consultation sought feedback on the updated strategy, which is then to be updated based on the feedback received and considered for approval by the Highways and Transport Committee in 2022.

# **Consultation methodology**

The consultation was approved to proceed via the Highways and Transport Sub Committee on 16 November 2021, and was live between 1 December 2021 and 31 January 2022.

The consultation widely promoted through:

- Media releases beginning on 30 November 2021
- Emails and reminders distributed to the stakeholders listed in Appendix 1 –
   Stakeholder distribution list
- Social media posts on Twitter and Facebook

Consultation feedback could be submitted by:

- Completing an online survey
- Submitting a document containing feedback in any format
- Emailing smsconsult@cheshireeasthighways.org
- Writing to Research and Consultation, Cheshire East Council, Westfields, Middlewich Road, Sandbach, CW11 1HZ
- Completing a paper survey available in a local library and returning it to Research and Consultation, Cheshire East Council, Westfields, Middlewich Road, Sandbach, CW11 1HZ.

# **Number of consultation responses**

The total number of consultation responses and engagements was 916, and these were received as:

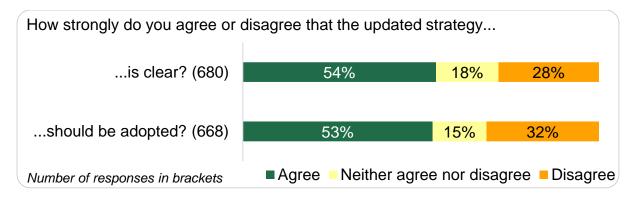
- 705 survey responses
- 133 email responses see Appendix 2
- 66 social media engagements see Appendix 4
- 12 focus group attendees see Appendix 3

# Rating the strategy overall

# Clarity of the strategy

Just over half of respondents agreed that the updated strategy:

- Is clear (54% agree, 28% disagree)
- Should be adopted (53% agree, 32% disagree)

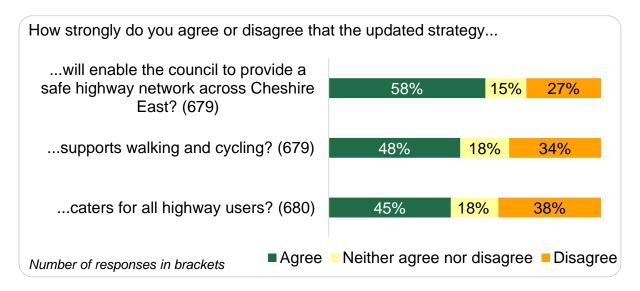


#### **Active Travel ambitions**

Just over half of respondents also agreed that the updated strategy will enable the council to provide a safe highway network across Cheshire East (58% agree, 27% disagree).

Just less than half of respondents agreed the updated strategy:

- Supports walking and cycling (48% agree, 34% disagree)
- Caters for all highways users (45% agree, 38% disagree)

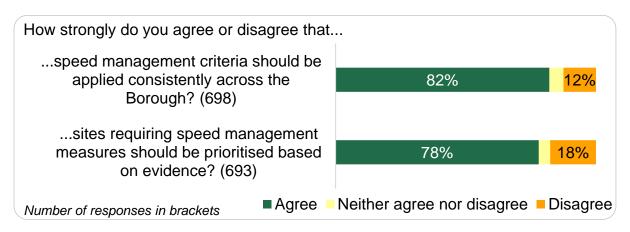


# **Speed management**

# Applying speed management criteria

Large majorities of respondents agreed that:

- Speed management criteria should be applied consistently across the Borough (82% agree, 12% disagree)
- Sites requiring speed management measures should be prioritised based on evidence (78% agree, 1% disagree)



# **Comments made about Speed Management**

The following briefly summarises comments made by respondents in response to the 2 above questions. A full summary of responses can be found in Appendix 5.

# The strategy should introduce widespread 20mph zones to help achieve Active Travel ambitions (277 comments)

- Significantly increase the number of 20mph zones in Cheshire East. (121 comments)
- The strategy should introduce speed control measures based on:
  - Active Travel ambitions. (43 comments)
  - The location of residential / built up areas, including villages. (24 comments)
  - The specifics of the geographical location, road conditions and layout. (15 comments)
  - The location of schools. (9 comments)
  - The narrowness of country lanes / rurality. (7 comments)
  - The location of playground areas / early years settings. (2 comments)
  - Noise levels. (2 comments)
  - Where there is evidence of current speeding. (2 comments)
- The council must not wait for accidents before making changes. (35 comments)

 Evidence takes a long time to collect – action is needed now. The use of evidence is retrospective and not proactive. (17 comments)

# Opposition to the introduction of blanket speed limits (19 comments)

- Opposed to a blanket 20mph speed limit. (18 comments)
- Too many 50mph speed limits have been imposed on roads that do not require such a limit. (1 comment)

# Take into account local views when considering speed control measures (38 comments)

 Take into account the views of local residents, Town/Parish Councils and Councillors when considering which sites require speed management measures. (38 comments)

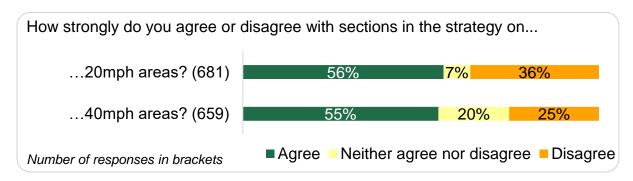
# Consistency when applying speed control measures across the borough is important (44 comments)

- Speed limits must not be set for political reasons. (11 comments)
- Some areas in Cheshire East are treated differently than others. (9 comments)
- Consistency and simplicity is important to ensure understanding by the public.
   The 2 statements in the survey contradict each other how can speed management criteria apply across the borough, and yet sites for speed management measures be prioritised based on evidence? (9 comments)
- The same speed limits should apply across all of Cheshire to avoid confusion.
   (6 comments)
- Follow national and international guidance and schemes. (8 comments)
- Consistency would come with time. (1 comment)

# 20mph and 40mph areas

Just over half of respondents agreed with the sections in the strategy on:

- 20 mph areas (56% agree, 36% disagree)
- 40 mph areas (55% agree, 25% disagree)



# Comments made about 20mph and 40mph zones

The following briefly summarises comments made by respondents in response to the 2 above questions. A full summary of responses can be found in Appendix 5.

#### **Enable communities to create 20mph zones more proactively (46 comments)**

- Opposition to the concept that 20mph areas will only be considered in locations which are already self-compliant. 20mph zones are needed in places not just where speeds are already below 28mph, and would prefer a more proactive approach where 20mph is considered desirable even if average speeds are higher. They felt 20mph areas ought to apply to areas where there are high concentrations of vulnerable road users, regardless of current speeds. They stressed that if speeds are kept at a higher level then active travel will be discouraged and the higher speed limit will seem to be appropriate and therefore "the motorcar wins". (33 comments)
- Local communities should be given more influence when developing local speed limits. (6 comments)
- There are too many bureaucratic obstacles in the strategy to bringing in 20mph limits. (5 comments)
- Improve the communications process for communities. (2 comments)

# The introduction of speed measures should be evidence based and consistent (14 comments)

- Policies should be evidence based. (5 comments)
- Speed limits should only be introduced in areas where people are currently speeding. (6 comments)

• 20mph zones have only been introduced in areas where pressure groups have demanded them. (3 comments)

# People drive too fast and existing speed limits should be enforced (46 comments)

- Enforcing existing speed limits should be the priority. (24 comments)
- People drive too fast on rural roads. (19 comments)
- People will drive as fast as the speed limit that is set (3 comments)

# Cars dominate our environments (10 comments)

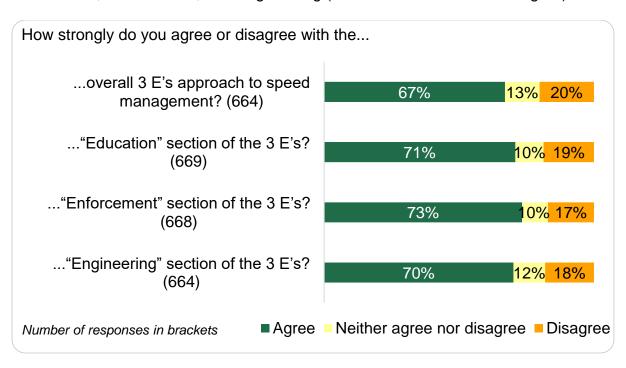
- Cars need to be stopped from dominating our environments. (8 comments)
- Pedestrianise town centres more (2 comments)

#### The strategy is complex, contradictory and not flexible enough (21 comments)

- The guidelines in the strategy are contradictory and not applied consistently. (8 comments)
- The strategy is long, complex and complicated. (6 comments)
- The strategy seems very prescriptive, and needs to be more flexible as it doesn't cover every eventuality. (5 comments)
- The strategy seems to be "anti-20mph". (2 comments)

# The 3 E's approach to speed management

Between 70% and 73% of respondents agree with each of the 3 sections of the 3 E's – Education, Enforcement, and Engineering (between 17% and 19% disagree).

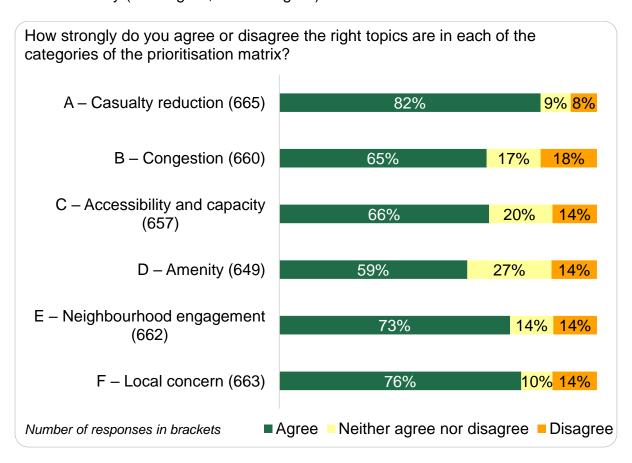


# The prioritisation matrix

# Prioritisation matrix categories and topics

Levels of agreement that the right topics are in each of the categories of the prioritisation matrix were:

- Casualty reduction (82% agree, 8% disagree)
- Local concern (76% agree, 14% disagree)
- Neighbourhood engagement (73% agree, 14% disagree)
- Accessibility and capacity (66% agree, 14% disagree)
- Congestion (65% agree, 18% disagree)
- Amenity (59% agree, 14% disagree)



# Comments made about the prioritisation matrix categories

The following briefly summarises comments made by respondents in response to an open question asking if respondents felt there were any other categories or topics be considered in the prioritisation matrix. A full summary of responses can be found in Appendix 5.

# Section A – Casualty Reduction (21 comments)

New categories in this section should include:

Near misses – These should be counted as well as actual collisions (6 comments)

General comments on this section included:

- We should not wait until there's an accident before making changes the emphasis of the whole strategy needs to change (3 comments)
- Fatal accidents should be weighted higher (3 comments)

# Section B - Congestion (26 comments)

New categories in this section should include:

- The amount of pavement parking and bus stops in an area (7 comments)
- The number of HGVs and farm vehicles using a route (4 comments)
- The number of cyclists and pedestrians using an area (3 comments)

#### Section C – Accessibility and Capacity (23 comments)

New categories in this section should include:

- The number of schools and hospitals in the area (8 comments)
- The number of pavements and cycle lanes in the area (3 comments)
- The number of pedestrian crossings in the area (2 comments)
- The number of additional on road hazards e.g. pedestrians on narrow rural roads / horses / tractors (2 comments)

General comments on this section included:

 Current traffic speeds are felt to be a barrier to Active Travel (pedestrians and cyclists) – if traffic speeds were lower levels of Active Travel might be higher (6 comments)

#### Section D – Amenity (40 comments)

New categories in this section should include:

- The amount of Active Travel in the area / How much of a priority it is to have Active Travel in the area (28 comments)
- The amount of equine traffic in an area (3 comments)
- The number of schools in the area (3 comments)
- The potential impact of future planning changes e.g. HS2 (3 comments)

Whether there are any large event venues or events in the local area (2 comments)

#### Section E – Neighbourhood Engagement (13 comments)

General comments on this section included:

• There should be more focus on this section (10 comments)

# Section F - Local Concern (32 comments)

General comments on this section included:

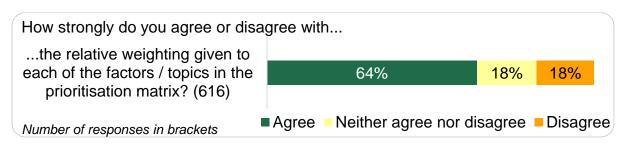
- There should be more focus on this section (23 comments)
- There should be more local influence over the Speed Management Group (SMG) (5 comments)
- Engagement rates in deprived areas are low and therefore a concern for their ability to influence (2 comments)

# New suggested categories (10 comments)

- The local geography of the area should be a new category e.g. blind bends, lack of pavements (4 comments)
- The level of traffic noise should be a new category (3 comments)
- The amount of speeding in an area should be a new category (3 comments)

# **Prioritisation matrix weighting**

A majority of respondents, 64%, agree with the relative weighting given to each of the factors / topics in the prioritisation matrix, 18% disagree.



# Comments made about prioritisation matrix weightings

The following briefly summarises comments made by respondents in response to an open question asking why respondents disagree with the relative weighting given to each of the factors / topics in the prioritisation matrix. A full summary of responses can be found in Appendix 5.

#### Section A – Casualty Reduction (53 comments)

- Scoring is needed for near collisions or incidents without any casualties (20 comments)
- Scoring should be higher generally for this category (2 comments)
- A.1 Scoring should be higher (8 comments)
- A.1 Definition needs to be given to what constitutes a 'serious' injury (4 comments)
- A.2 Scoring is too open to interpretation (what counts as a speed related incident?) (12 comments)

## Section C – Accessibility and Capacity (3 comments)

- C.14 Scoring should be higher e.g. 20 (1 comment)
- Scoring should be included for footpath condition (1 comment)
- Scoring should be included for nearby crossing points (1 comment)

### Section E – Neighbourhood Engagement (7 comments)

- E.20 MP scoring should be reduced/removed (1 comment)
- E.21/22/23 Councillors scores should be increased to 30 (1 comment)

# **Section F - Local Concern (10 comments)**

Unsure how information for this category would be collected (1 comment)

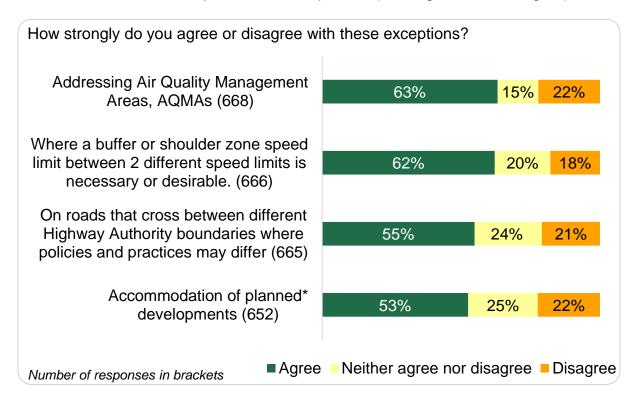
### **General reasons for disagreeing with weightings (75 comments)**

- Rather than assessing risk to decide whether to bring in speed control measures, measures should be taken now instead to reduce speeding across the board (25 comments)
- A category and scoring should be included for Active Travel users (11 comments)
- Needs to be consideration of what caused the incident, not just the results (7 comments)
- Scoring does not consider local conditions, blind bends width of roads or pavements, speed limits etc (5 comments)

# **Exceptions**

Levels of agreement with each of the exceptions were:

- Where a buffer or shoulder zone speed limit between 2 different speed limits is necessary or desirable (65% agree, 17% disagree)
- Addressing Air Quality Management Areas, AQMAs (64% agree, 22% disagree)
- On roads that cross between different Highway Authority boundaries where policies and practices may differ (55% agree, 20% disagree)
- Accommodation of planned\* developments (53% agree, 21% disagree)



<sup>\*</sup>Planned developments are developments that have received planning permission.

# **Comments made about Exceptions**

The following briefly summarises comments made by respondents in response to the above questions. A full summary of responses can be found in Appendix 5.

#### New exceptions are needed... (81 comments)

- In potential Active Travel areas. (29 comments)
- In all residential areas. (26 comments)
- Depending on local requests from Town and Parish Councils, Councillors, and local residents. (8 comments)
- Around all schools. (7 comments)

- In areas with noise problems. (6 comments)
- On rural roads that are too narrow (3 comments)
- Where road changes will lead to knock on speed effects. (2 comments)

# Four exceptions are too many, further exceptions are not needed (26 comments)

- Four exceptions are too many the fewer exceptions the better to help fairness and consistency. (24 comments)
- Cynicism about the motives for the exceptions. (1 comment)
- These are detailed questions which should be handled by experts. (1 comment)

# Air Quality Management Area (AQMA) Exceptions (21 comments)

- Electric car technology is making air quality less of an issue. (7 comments)
- Slower driving does not help improve air quality. (6 comments)
- Lack of faith in the council's approach to air quality. (3 comments)
- Air quality is an important issue. (2 comments)
- Detail on AQMAs seems ambiguous. (2 comments)

#### **Buffer or Shoulder Zone Exceptions (1 comment)**

• These exceptions are important. (1 comment)

#### Planned Development Exceptions (4 comments)

- Limits implemented when 50% of houses on new developments are occupied seems arbitrary, why not apply limits on the first occupation? (2 comments)
- The default speed limit should be 20mph not 30mph. (2 comments)

# **Conclusions**

# A large consultation response

It is extremely positive to see such a large number of consultation responses – 916 in total. This emphasises the good efforts taken by the Highways Team to promote the consultation, but also indicates the strength of feeling towards the topic of speed control in Cheshire East. This certainly seems to be a topical issue at the moment, and as such may require further engagement in future with local Cheshire East stakeholders and communities.

#### Positive overall feedback

Overall feedback towards the strategy seems to be positive. It is very encouraging to see that a majority of respondents agree the strategy should be adopted (53% agree), though it is noted that a significant proportion disagree that it should be adopted (32%). This perhaps indicates that while the strategy is on the right track, it may need improving.

### **Introducing 20mph zones in Cheshire East**

The main feedback received about the strategy was that it should do more to introduce 20mph zones within Cheshire East, with some calling for all residential areas in Cheshire East to be made 20mph by default, such as has been done in other areas including Cheshire West and Chester.

Respondents felt this would benefit communities significantly and would help the council achieve its Active Travel aims – there is a clear sense from some that council policy should put the needs of other highway users above those of car users, and that implementing 20mph zones across Cheshire East as standard would be a good step towards those aims.

However, it should be noted that not all respondents want 20mph zones imposing across Cheshire East as standard – it may be that separate consultation on this single issue will be needed before such a policy can be considered.

#### The strategy needs to be more enabling

There was also comment from some that the strategy is too prescriptive, too bureaucratic, does not enable communities to impose speed control measures in their local areas, and does not work in partnership with local communities.

Some felt that rather than waiting for accidents to occur before making changes, or only applying limits in areas which already adhere to the speed limit, a more proactive

approach was needed, perhaps with 20mph zones becoming the standard, rather than the exception.

Others were concerned that it would take too long to collect the evidence in local areas to make a case for the implementation of speed control measures, and felt this was a bureaucratic barrier to achieving Active Travel in local communities.

There was also concern that the strategy will consider speed control measures in an area if Active Travel, or person movement, was already high, but pointed out that until car speeds are slowed then Active Travel movement may not be as high as it could be – this may be a chicken and egg situation.

### **Consistency Vs Enabling local communities**

There was also concern expressed about the need for the strategy to be consistent – some were afraid that if some areas implement speed control measures on request, and others do not, that this could lead to unfairness across the borough, as well as confusion for drivers moving from one area to another.

That said, there were clear calls from some stakeholders for the council to enable local communities to create 20mph zones more proactively, and for the council to work more in partnership with local communities on speed management. It seems clear that some communities in Cheshire East do want to be much more proactive about controlling speed in their communities, and many felt the strategy should enable this to happen much more than it does. How this is achieved whilst remaining consistent across the borough is another tricky challenge.

#### **Editing specifics in the strategy**

Generally speaking respondents were fairly satisfied with the specifics of the strategy, though a number of specific improvements for the prioritisation matrix and list of exceptions were suggested, and these specifics can be found within the main report.

# Appendix 1 – Stakeholder distribution list

The consultation was promoted to the following stakeholders, mainly via email:

Local Government
All ward members
Town Councils
Parish Councils
Emergency Services
Police Liaison
Cheshire Constabulary
Police and Crime Commissioner
Cheshire Fire and Rescue
NWAS
Mid Cheshire NHS trust
East Cheshire NHS trust
Cheshire East Council – Internal departments / teams
Cheshire East Highways
Highways Strategic
Planning
Environment
Public Rights of Way (PROW)
Development Management
Passenger Transport
Education
School organisation and admission
Education participation and pupil support
Childrens Development and Partnerships
Governance
Taxi licencing
ANSA Environmental Services
Everybody Leisure
Health
Cheshire East Primary and Secondary Schools (via schools bulletins)
Motoring Groups
Mikro Coaches
First Potteries
Hollinsheads Coaches
High Peak ( Centrebus)
Go Goodwins
Warringtons Own Buses
ARRIVA North West & Wales
D & G Bus
Stagecoach
TSS/ANSA

Condition Advanced Didore and Driver Club
Congleton Advanced Riders and Driver Club
Road Haulage Association
Cycling Groups
CTC
Congleton Cycling Campaign
Crewe Clarion Wheelers
Cycle Knutsford
Cycle Wilmslow
Macclesfield Wheelers
Sustrans
Active Travel Crewe
Audlem Cycling Club
Cheshire Roads Club
Congleton Cycling Club
Congleton U3A Cycling Group
Frodsham Wheelers
North Cheshire Clarion Cycling Club
Sandbach Cycling Group
Seamons Cycling Club
South Manchester CTC
Stockport Clarion Cycling Club
Stockport Community Cycling Club
Weaver Valley Cycling Club
Adapt-e
Walking Groups
•
Alderley Edge and Wilmslow Footpaths Preservation Society
Alderley Edge and Wilmslow Footpaths Preservation Society Cheshire Walkers
Alderley Edge and Wilmslow Footpaths Preservation Society Cheshire Walkers Congleton Ramblers Group
Alderley Edge and Wilmslow Footpaths Preservation Society Cheshire Walkers Congleton Ramblers Group East Cheshire Ramblers
Alderley Edge and Wilmslow Footpaths Preservation Society Cheshire Walkers Congleton Ramblers Group East Cheshire Ramblers Mid Cheshire Footpaths Society
Alderley Edge and Wilmslow Footpaths Preservation Society Cheshire Walkers Congleton Ramblers Group East Cheshire Ramblers Mid Cheshire Footpaths Society North and Mid Cheshire Ramblers
Alderley Edge and Wilmslow Footpaths Preservation Society Cheshire Walkers Congleton Ramblers Group East Cheshire Ramblers Mid Cheshire Footpaths Society North and Mid Cheshire Ramblers Peak and Northern Footpaths Society
Alderley Edge and Wilmslow Footpaths Preservation Society Cheshire Walkers Congleton Ramblers Group East Cheshire Ramblers Mid Cheshire Footpaths Society North and Mid Cheshire Ramblers Peak and Northern Footpaths Society Sandbach Footpath Group
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Green Lane Association Ltd. (GLASS)
Cheshire Road Safety Group
Cheshire West and Chester
Warrington Borough Council
Halton Borough Council
Highways England
Cheshire Police
Cross Border Local Authorities
Derbyshire County Council
Staffordshire County Council
Shropshire County Council
Warrington Borough Council
Trafford Council
Manchester City Council
Stoke on Trent City Council
Newcastle Under Lyme Borough Council

# **Appendix 2 – Email response summary**

The following appendix contains a summary of all email responses that were received as part of the consultation.

In total 133 email responses were received as part of the consultation, from a wide range of stakeholders including those listed below.

# Local organisations:

- 1st Wilmslow Guides
- 20s Plenty Organisation
- Active Travel Congleton
- Bott & Co Solicitors Ltd
- Cheshire Association of Local Councils (ChALC)
- Cheshire East Councillors
- Cycle Wilmslow
- Prestbury Community Speed Surveillance Group

- Residents Committee Wilmslow
- Sandbach Cycling Group
- School of Biological Sciences, University of Manchester
- Seamons Cycling Club
- Senior Council Highways Officers
- Transition Wilmslow
- Wilmslow Education Partnership

# Local town and parish councils:

- Alderley Edge Parish Council
- Alsager Town Council
- Brereton Parish Coucnil
- Congleton Town Council
- Cranage Parish Council
- Crewe Town Council
- Disley Parish Council
- Goostrey Parish Council
- Goostrey Parish Council

- Holmes Chapel Parish Council
- Knutsford Town Council
- Marbury and District Parish Council
- Mobberley Parish Council
- Moston Parish Council
- Pickmere Parish Council
- Rope Parish Council
- Sandbach Town Council
- Sutton Parish Council

#### Local schools:

- Beechwood Primary and Nursery
- Edleston Primary School
- Gorsey Bank Primary School PTA
- Ivy Bank Primary School
- Monks Coppenhall Academy and Day Nursery
- St John the Evangelist CE Aided Primary School
- Wincle CE Primary School

Comments made within these emails have been summarised and grouped together into the following themes.

# Theme: 20 and 40 mph speed limits (99 email comments)

- Supports 20mph speed limit (58 email comments)
  - Supports 20mph speed limit in Residential Areas (25 email comments)
  - Supports 20mph speed limit in Urban Areas (4 email comments)
  - Supports 20mph speed limit in Rural Villages (3 email comments)
- Doesn't support 20mph speed limit (4 email comments)
- Supports 40mph speed limit (1 email comment)
  - Supports 40mph speed limit on Rural Roads (4 email comments)

# Theme: Speed control measures (29 email comments)

- Supports use of Speed Indicator Devices (SIDs) (10 email comments)
- Supports community speed watch (6 email comments)
- Supports Average speed cameras (AVC) (3 email comments)
- Supports use of speed cameras (1 email comment)
- Better measures installed on existing speed limits (6 email comments)
- Supports driver education (1 email comment)
- Look at rural roads safety to protect vulnerable road users e.g. bikes and horses (1 email comment)
- Introduce other measures such as table crossings, road markings and coloured surfacing when appropriate (1 email comment)

#### Theme: Community liaison (26 email comments)

- Consider local resident views (16 email comments)
- Supports working closely with local councils (7 email comments)
- Supports working with the police (2 email comments)
- Define how community supports will be achieved (1 email comment)

#### Theme: The strategy (14 email comments)

- Phrase (the strategy) more positively, (it is) too negative (8 email comments)
- The strategy is too long (1 email comment)
- Define how the strategy will be achieved (1 email comment)
- Refer to the 2016 strategy (1 email comment)
- Consistency and simplicity is needed to ensure understanding of public safety by the road users (1 email comment)
- Review evidence base for SMS (1 email comment)
- Supports national and international guidance (1 email comment)

# Theme: Other comments (9 email comments)

- Doesn't agree with the idea of speed being 24mph or lower for a 20mph zone (2 email comments)
- Show a link between planning permission and speed management (2 email comments)
- Speed control measures should be in place judging off speed records and shouldn't be done after an accident to prevent this in the first place (2 email comments)
- Supports the request for equipment (1 email comment)
- Data to evaluate in speed watch section (1 email comment)
- Incorporate noise pollution (1 email comment)

# **Appendix 3 – Focus group feedback**

# Focus group 26 January 2022

On 26 January 2022 FP of Cheshire East Council facilitated a focus group to discuss the updated Speed Management Strategy, being consulted on during January 2022.

Attendees included Cheshire East Council officers, as well as stakeholders representing external organisations including Cheshire Association of Local Councils (ChALC), Cheshire Fire Service and Cheshire Police.

The focus group ran through a short presentation of the key discussion points within the updated strategy, with attendees being invited to comment as desired.

# Focus group attendees

- Focus Group Facilitator
- Cheshire Association of Local Councils (CHALC) member, Parish Councillor
- Cheshire Fire Service representative
- Cheshire Police representative
- Cheshire East Highways Design Manager
- CEC Head of Strategic Transport and Parking
- CEC Road Safety Technician
- CEC Air Quality Officer
- CEC Senior Road Technical Road Safety
- CEC Contract Asset Manager Client Team
- CEC Network and Road Safety Manager
- CEC Consultation Team

# Focus group material

During the focus group FP ran through the following presentation, with content used to direct discussion.

# **Meeting notes**

The following comments we made during the discussion by the various attendees. Comments have been summarised and grouped together into the following themes.

# Theme: 20 mph zones – 22 comments

 Listening to the political debates on this – we will get considerable public and political pressure to considerably lower the current speed limits to "20 is plenty".
 How do we make sure there is provision to handle the desire for lower speeds?

- Most housing estates are designed for 20mph anyway.
- How we deal with speed enforcement in response to community concerns and linking that to other programs, particularly around programs for walking and cycling. There's probably a causal link between community concern about speed, and concern from parents about allowing children to walk and cycle to school. Address one issue, identify issues, and there are broader links into other issues including environmental.
- There has been a big campaign people believe the strategy is about 20mph zones, but that is not what the consultation is about.
- This is the overriding concern we need to address a lot of people are reading the strategy as it is, to mean we are preventing 20mph zones.
- It can be meaningful to improve the Place that people live through having more 20mph zones. This is consistent with a lot of other thing the councils want to do.
- 20mph measures can be effective, but most places asking for 20mph would need engineering works – we need to be clear about what an enforceable speed limit area is. It's not just about the police trying to catch as many people speeding as possible, physical engineering measures are needed to slow speeds down, they have been brought in outside schools, but the current data shows people are still speeding.
- Once you do bring in 20mph zones, what is the knock-on effect in other areas.
- We are getting a lot of pressure to introduce blanket 20mph zones in residential areas. Do you need a formal TRO for 20, when places are designed for speeds to be lower? The pressure I am getting is for the whole residential areas a lot of spine roads which are designed for 30mph. I don't think blanket 20mph zones are the right thing to do. It's right to restrict speed to 20mph where roads have been designed for that. Will there be enforcement of 20mph in current 30mph zones? The strategy is right about where 20mph zones will be accepted, but we will be under pressure to accept wider areas for 20mph zones.
- The key for me is to have the right limit in the right place What's the road designed for, what is meant in Well Managed Highways by road hierarchy. If the role is to move people from A to B, we need to look at other ways of keeping people safe, bringing in lower speed limits reduces the roads ability to move traffic and will increase congestion. A local access road for example, you could consider a lower speed limit. If it is a main distributor, we would need to be more resistant. We would need to consider road function when considering speed limits.
- I understand there is a road hierarchy, but there is a communication problem, what doesn't happen in the strategy is to explain the rationale it just says we can't allow this, we can't allow that, without explaining the rationale. Without explaining we'll get political pushback. Have a dialogue about 20mph zones.
- We have had a lot of engagement with parish councils, but sometimes a 20mph zone doesn't solve the issue. Maybe we can do a campaign on the back of this

about speed management, explaining the reasons for our policy. Explaining that just putting up 20mph signs won't do anything. But we have to have facts behind why we are spending public funds and why.

- What measures would be necessary to bring the baseline speeds into line, and how much that would cost
- Modern average speed cameras will enforce 20mph.
- We have done advisory 20mph zones outside schools no police expectation to enforce those. CW&C have gone down the 20mph route on all residential roads, though feeder roads tend to be 30mph, it will be interesting to see how police are finding enforcement in mixed 20 and 30 mph zones.
- There are a few 20mph zones in the borough already. 20mph zones is a comforting thing. We need to consider how we fund these based on community concerns. Funding for this will need to come from somewhere.
- There are alternative funding mechanisms once areas are accepted for 20mph zones.
- Maybe we need to look at funding based on KSIs, but also on the level of community concern.
- When we do other strategy reviews Winter Maintenance etc we tend to run the assessment criteria and we create a borough map, indicating the impact on the borough. Can we model on a map of the borough showing where we think 20mph zones might be appropriate, can we include that in the strategy?
- No. We don't have that data available. We can't go public with that without having done the due diligence, and have a couple of years of data, and a couple of years of data to support any conclusions and future policy.
- When council's were more cash rich, when they had extensive data on traffic speed and volumes, but now our traffic data is very basic at best, but TfGM have been doing various items of work with phone providers on road usage so 15% of people who have an O2 phone, traffic figures can be extrapolated from that. This could be something we start to look at in future, it is expensive, but it is getting cheaper. Understanding how our network works is imperative. This would overarch all our highways policies and strategies so this is something we should look at.
- That technology is available, but you have to pay to access that data, and it is an annual fee and it is quite high at the moment, but it is an option, but if it is a good area of resource then it is an avenue we can go down.

### Theme: Speed Indicator Devices (SIDs) – 14 comments

- SIDs should only be used where evidence shows there are problems with accidents or speeding
- SIDs should only be temporary, not permanent

- Dorset published a study about the speed reduction was achieved with SIDs results revealed average speeds decreased by 2.6 miles per hour after their implementation. 2 other studies from Leeds show similar findings.
- Local councils have good information about the speeds in their localities, supported by SIDs. There is benefit from SIDs, evidence backs that up, they do help collect data and they are valued by local communities.
- The approach of the strategy seems to be whether Cheshire East Council "we will allow things" – why have a prescriptive policy which states we can't have SIDs?
- The strategy is too dismissive of SIDs.
- Have we ever deployed a SID, and had it backed up by a speed camera van?
   They may work well effectively.
- Funding is an issue in relation to SIDs.
- The problem with SIDs is that if there are too many people will ignore them, and they also pick up accidental speeders.
- One concern is the number of permanent SID posts people want putting in.
   Some have faulty SID units sat there doing nothing for a number of years.
   Parishes put the units up and they are not maintained more input is needed from local parishes.
- Where do liabilities for SIDs sit? Who is maintaining them, who is responsible for them?
- Regarding types of SID Government guidelines state there shouldn't be smiley faces.
- If the DfT haven't agreed to them, individual agreements would need to be made for each individual unit.
- There will need to be a dialogue about existing SIDs, and that might be needed with individual parishes.

#### Theme: Speed enforcement – 12 comments

- A lot of correspondence we get is about speeding, and there is a belief the council can do something about speeding. The council is seeking to clarify what solutions are open to address problems which have been identified, and addressing our role in how we manage speeding.
- It's important to stress that it is the police that enforce speed limits. People come to the council to complain about speeding rather than going to the police

   we need to be clear that people need to go to the police.
- A staggered approach is required. Intel, KSIs, road policing unit, we have a structure in place, when we need to link in to fire etc, true cam, speed vans, deployed on an intelligence led basis. We are in a good place in terms of enforcement.
- Our understanding is the policies escalate get some data from police or surveys indicating there is a problem, the next stage in escalation is a SID, then

- enforcement (perhaps a police van, or PCSO with a speed gun), then eventually a fixed camera.
- We link up with the police regularly, the police have difficulties in certain areas being able to enforce safely, so CE have put in a number of hard standing areas to enable the police to enforce speeding limits. We listen to concerns the police have throughout the year and assist where we can, we have seen improvements over the last 12 months. There are not many issues around enforcement now.
- Do we need to future proof the strategy, for circumstances where there might be an increasing number of speeding from autonomous cars which might be on the streets in 2 years. This strategy has a lifetime.
- We quite often get a push back because "the police won't enforce speed limits"
   is that a real problem?
- The noise element of enforcement has also come up as an issue lately
- Sometimes we think the police won't enforce speed limits, a key issue today is in understanding what issues the police face in this regard, what can we do to help the police enforce speed limits it would be useful to understand.
- How many fixed cameras are in CE? Not many. Fixed cameras are better than
  police enforcement. We are not saying fixed cameras are the only solution.
  There is an opportunity to fund average speed cameras, if there is evidence of
  a lot of speeding.
- (The police) do respond to community concern, but our resources are finite.
   PCSOs are in place to deal with local issues, our highways police deal with main roads including motorways. Not sure if the council targets 20mph, not sure we have cameras that measure at those speeds. A lot of communities have issues with speed, and the solutions have to come out of community.
- Funding is the issue our ability to collaborate and enforce is based on funding, to give officers time to develop strategies etc. If we apply speed limits that cause issues to policing we need to understand that, we need to work more closely with partners.

# Theme: Make the strategy more proactive, work with local partners – 5 comments

- The narrative of the strategy seems to be saying "you can't do that" instead of encouraging people to be proactive.
- The council is in danger of stopping the possible, because the strategy is too rigid. It prevents the council working in partnerships with others to deliver an important part of the strategy. Cheshire East Council needs to look at things through a different lens, to look at what we can achieve together, how can we help, rather than being told what we can't do.
- Police can't be in the locations when traffic is at the maximum, which is why ChALC wants to look at other solutions. We are not saying we are the highways authority or the police.

- Think of local councils as delivery partners what can the strategy do to encourage them to be delivery partners?
- The strategy can't be too prescriptive. Be more open ended, you can finesse it.

# Theme: Engineering – 5 comments

- Anything that slows traffic down is bad for air quality.
- For the strategy to be fully comprehensive we probably need to say something about vehicle engineering this will be a major contributor to speed management and air quality. This needs referencing in the strategy.
- How we prioritise schemes is in the strategy, have we got that right? Funding is limited.
- We shouldn't write the strategy being constrained by funding there are other avenues for funding. Lets get the strategy right first, then worry about funding later.
- We do get enquires to remove traffic calming measures it's not all one way, some are opposed to it. It's a 2-way thing.

#### Theme: Wider education initiatives – 2 comments

- We've looked into the pop-up children, utilised outside schools, some schools
  do use them. They are a tool going forward, they won't be suitable for every
  area, can be used to guide children and stop unnecessary parking. But this is
  another area for the future, only currently aware of 1 or 2 schools that use them.
- Have we got appropriate references to other travel behaviour change initiatives, such as walk and cycle to schools. The success of those initiatives are closely linked to successful speed management on routes to schools.

# Appendix 4 – Social media feedback

The following appendix contains a summary of social media engagements on Twitter and Facebook that were received as part of the consultation.

In total 66 social media engagements were received as part of the consultation, with a summary of these included below.

#### Twitter feedback

The following responses were found on a publicly accessible search on the phrases "Cheshire East" and "speed management".



The hyperlink for the above is: https://www.20splenty.org/ce\_sms\_critique



### CycleWilmslow @CycleWilmslow · 19 Jan

Please also try to have your say on the Cheshire East Council Speed Management Strategy Consultation. Attached is an explanation from our friends at @TransitionWilms and @20splentyforus @20sPlenty4Wilm. @CycleWilmslow supports their campaigning on this





#### Now's our chance to create change...

- '20's Plenty for Wilmslow' is a Wilmslow-wide speed reduction campaign from Transition Wilmslow,\(^1\) (a community group supporting the vision of a sustainable Wilmslow). The Campaign champions 20mph as the default speed limit across the residential roads of our town.

  The Cheshire East Council consultation is taking place new on the Cheshire East Council Speed Management Strategy,\(^2\)

  Responses by email to ransonabilite Cheshireaesthiphways.org and completing survey: <a href="https://surveys.cheshireaest.gov.uk/s/502ZE/">https://surveys.cheshireaest.gov.uk/s/502ZE/</a> by 31st Jan 2022.

#### Key points:

- Safety concerns about traffic speed prevents people making sustainable transport choices.
   Traffic at slower speeds gives shorter stopping distances and less severe injuries and outcomes.
   20mph as default would encourage planet friendly transport choices (walking, cycling etc.).
   Cheshire West and Chester, Halton and Warrington Councils have already adopted 20mph as standard. Cheshire East should do the same.
- should do the same.

  20mph is recognised by the UN / WHO<sup>3</sup> as international best practice in urban areas with a mix of road users (cars; cyclists; pedestrians etc)

Reasons we hope you will support this campaign:



20s Plenty for Wilmslow and Ches... @20sPlenty4... · 20 Dec 2021 The **speed management** strategy that's out for consultation is outdated: we need you to email Cheshire East and in your own words say why you support 20mph limits... Look back at our tweets for prompts. ...

ACTive Crewe Travel @ActiveTravelCre · 20 Dec 2021 Do you support 20mph in residential streets? Email the Cheshire East consultation team @20splentyforus @20sPlenty4Wilm





## CycleWilmslow @CycleWilmslow · 31 Jan

It's the last day to comment on the **Cheshire East** Draft **Speed Management** Strategy. @CycleWilmslow and others believe it is flawed, watered-down & fails to always put vulnerable road users at the heart of the thinking.

surveys.cheshireeast.gov.uk/s/SpeedManagem...

#### @20sPlenty4Wilm @TransitionWilms

Rod King MBE 30kmh/20mph limit cha... @20splentyfo... · 30 Jan We list 51 individual failures in the @CheshireEast Speed Management Strategy that is out for consultation till Monday. Please respond and tell them that they "must try harder" to meet the needs of communities for safer, quieter, healthier streets. 20splenty.org/ce\_sms\_critique





### Al/Val Scaresbrook @ValandAlec · 24 Jan

**Cheshire East**'s 20mph **speed management** strategy needs a response from all of us by end of Jan. The document and survey are in highways speak, so to make sense of it, take a look here for the doc summary and reaction (not good!):







Transition Wilmslow @TransitionWilms · 26 Jan

Have you responded to Cheshire East's Speed Management Strategy?

I want young people to gain independence around town, safely







transitionwilmslow.co.uk

Have you responded to Cheshire East's Speed Management Strategy? We don't like it much, so check out our 20splentyforus page where you'll find our summary of the strategy and Transition Wilmslow's ...



**20s Plenty for Wilmslow and Cheshire ...** @20sPlenty4Wi... · 31 Jan \*\*\* Wilmslow Girl Guides used their voice to respond to @CheshireEast Highways consultation. Have you? Still time - closes at midnight tonight!







20s Plenty for Wilmslow and Cheshire East Retweeted



Andrew Malloy @CllrAMalloy · 28 Jan

20's Plenty

where people are

Here is some guidance on how to respond to the Speed Management Strategy.

Most people I speak to want the road they live on to have a 20mph speed limit, so why not all residential streets by default, as in many neighbouring areas; Manchester, Cheshire West, Warrington etc.

Have your say by 31 Jan

smsconsult@cheshireeasthighways.org https://surveys.cheshireeast.gov.uk/s/JSOZZE/ @20splenty4Wilm F Facebook/TransitionWilmslov

Rod King MBE 30kmh/20mph limit cha... @20splentyfo... · 28 Jan Replying to @scottmlowe @CheshireEast and 2 others

See 20splenty.org/ce\_sms\_critique for our critique of the policy which fails in so many ways to meet the needs of communities



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**20s Plenty for Wilmslow and Cheshire ...** @20sPlenty4Wi... · 27 Jan · · · · 4 days to go... "[...] 51% of people aged 75 live alone. 2/5ths of older people say TV is their main company." -@Sustrans

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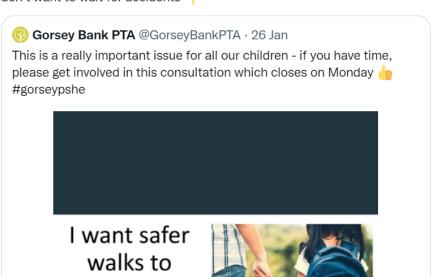
1

Our older relatives & neighbours need us to remove barriers to walking and cycling 4 exercise and to tackle social isolation. Tell @CECHighways @CheshireFast





**20s Plenty for Wilmslow and Cheshire ...** @20sPlenty4W... · 26 Jan •••• With the proposed SMS, CE Highways want to examine accident data before introducing lower speeds limits. That's the opposite of encouraging families to walk and cycle, which is also a stated aim. Parents and teachers don't want to wait for accidents







20s Plenty for Wilmslow and Cheshire ... @20sPlenty4W... · 20 Jan

The speed management strategy must be fundamentally changed to:
3) set out measures / timescale for systematic reduction in speeds of traffic in residential areas, inc. the adoption of a 20mph speed limit as the norm in residential roads.

Do you agree? #20sPlenty





**20s Plenty for Wilmslow and Cheshire ...** @20sPlenty4Wi... · 19 Jan

The Speed Management Strategy must be fundamentally changed to: 2) put the needs of vulnerable road users, children and the adoption of active travel central to the management of speed.

Any objections? #20splenty

@WilmslowsWB @wilmslowcouk @socheshire @KnutsfordNews





20s Plenty for Wilmslow and Cheshire ... @20sPlenty4Wi... · 19 Jan Yes, please do. The report is overly technical and misinterprets DfT guidance.

The survey has leading questions, but you can skip most of it and give a general view at the end to say you support implementing wide area 20mph speed limits for the sake of ALL road users... 🙏 🤎



#### CongletonTownCouncil @CongletonTown · 19 Jan

Cheshire East Council is urging residents to share their views on the authority's updated draft speed management strategy. To comment on the strategy, complete the survey online. The survey closes at midnight on 31 January 2022. See: zcu.io/q8wg

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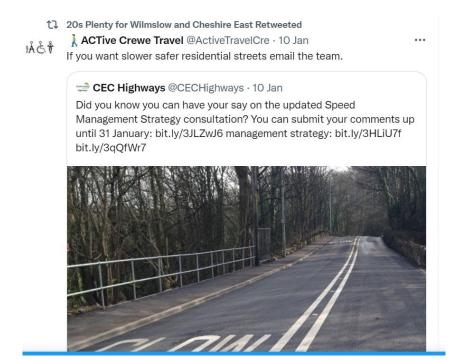
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20s Plenty for Wilmslow and Cheshire ... @20sPlenty4Wi... · 18 Jan The Speed Management Strategy must be fundamentally changed to: 1) acknowledge the centrality of traffic speed to the use of public space, including quality of life as well as collisions, injuries and deaths. What do you think? #20splenty

@CheshireEast @CECHighways





# Facebook feedback

The following responses were found on a publicly accessible search on the phrases "Cheshire East" and "speed management".



# **Appendix 5 – Survey open comment summaries**

The following appendix contains summaries of all open comments that were received in response to the open comment questions in the survey.

# **Comments made about Speed Management**

The following comments we remade in response to closed questions asking how strongly respondents agreed or disagreed:

- ...that speed management criteria should be applied consistently across the Borough?
- ...that sites requiring speed management measures should be prioritised based on evidence e.g. existing vehicle speeds, previous accident record etc?

Comments have been summarised and grouped together into the following themes.

# Theme: The strategy should introduce widespread 20mph zones to help achieve Active Travel ambitions (277 comments)

<u>Significantly increase the number of 20mph zones in Cheshire East</u>. Everywhere should have 20mph speed limits. People drive too fast and the roads are dangerous, especially for vulnerable highways users such as pedestrians, cyclists and school children. Speed limits need enforcing, more police are needed to do so. Install average speed cameras. Have more community speed watching schemes. (121 comments)

The strategy should introduce speed control measures based on:

- Active Travel ambitions Speed management should be aspirational, based on the desirable status: safer streets, more active travel, lower pollution, more environmental friendly communities, less noise, and less car usage especially for short journeys. Speed limits should be set depending on the number of vulnerable users in an area, such as walkers, cyclists, children, old people and disabled people. Speed management should be determined by the needs of ALL road users. The speed management strategy should be based on evidence that lower speeds encourage active travel, and protect vulnerable users including children this evidence can't be measured before the measures are brought in. If the evidence states that few people walk and cycle in an area this should not be used to state that no changes are needed, this should be used as evidence that more restrictions are needed. It is the existing speeds of motor vehicles, and the large size of some vehicles (e.g. trucks, tractors and trailers) that put people off walking and cycling. (43 comments)
- The location of residential / built up areas, including villages, including in areas without any markings and that also have new large housing

- developments built onto existing country lanes. 20mph zones should be applied in all residential areas. The evidence that somewhere is a residential street should be stronger than accident records. (24 comments)
- The specifics of the geographical location, road conditions and layout the council should adopt a more local approach to implementing speed measures. Cheshire East has an extensive and varied road network that has to meet the different needs of different terrains, topography and urban, rural and semi-rural connectivity. (15 comments)
- The location of schools. (9 comments)
- The narrowness of country lanes / rurality. Rural roads carry 40% of road traffic, but account for 62% of road fatalities see the following infographic for stats:
  - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/448037/road-fatalities-2013-data.pdf. (7 comments)
- The location of playground areas / early years settings. (2 comments)
- Noise levels. (2 comments)
- Where there is evidence of current speeding. (2 comments)

The council must not wait for accidents before making changes. The council should implement speed control measures more proactively, and not wait for accidents to happen before measures are put forward. Previous accident records are a poor measure if the intention is to promote active travel, for example, the road may be avoided by non-motorised transport because it is unsafe – Maybe there haven't been accidents because cyclists and pedestrians avoid some sites that they feel are too dangerous? (35 comments)

<u>Evidence takes a long time to collect – action is needed now</u>. The use of evidence is retrospective and not proactive. Collecting evidence is time and resource consuming, and there is no evidence for most streets in Cheshire East. It would take a long time to collect enough evidence for many areas in Cheshire East. Instead speeds should be made consistent across the borough, and the roads in our towns and residential areas made safer more proactively. A five-year accident survey necessity appears to be a rather long time for a 'new road' or where there have been substantial changes to the environment. (17 comments)

# Theme: Opposition to the introduction of blanket speed limits (19 comments)

Opposed to a blanket 20mph speed limit. While speed needs to be managed it should not be done as a blanket approach – reducing speed limits on all roads does not work it only causes friction and confusion to road users. Speed limits around schools and medical buildings should be dealt with on a national basis, and not by someone who is given a little bit of authority and lets it go to their head. Winter gritting policy is a blanket policy which does not work. Different villages / towns have different needs

speed wise and different approaches need to be made to fit the issue – one size does not fit all. Opposed to 20mph zones in general and speed bumps. (18 comments)

Too many 50mph speed limits have been imposed on roads that do not require such a limit. (1 comment)

# Theme: Take into account local views when considering speed control measures (38 comments)

Take into account the views of local residents, Town/Parish Councils and Councillors when considering which sites require speed management measures. Residents who live in an area know it better than anyone else so their representations should be weighted heavily in consideration of any changes to speed management in the areas they live in. Local residents should be able to lobby for action on speed limits on their own roads based on local knowledge and experience. Past projects have been approved by people who do not know the area. (38 comments)

# Theme: Consistency when applying speed control measures across the borough is important (44 comments)

<u>Speed limits must not be set for political reasons</u>. Keep road safety evidence based, otherwise those that complain the loudest will receive most of the funding. Consistency across the borough is important to avoid accusations of favouritism. Some roads have had speed limits reduced for no apparent reason. Political will and "something must be done" sentiment is not enough. Changes should be specific to individual roads and based on safety data not emotion and personal opinions. (11 comments)

Some areas in Cheshire East are treated differently than others. For example there are 20mph zones in Sandbach near schools but 40mph in Congleton. A consistent approach means treating all sites with the same measures, bringing speeds down across the board. Traffic speeds in built-up areas need to be standardised to leave no room for doubt. Imposing stronger traffic management measures and lower speeds in some areas and not others will direct traffic towards less-managed streets. (9 comments)

Consistency and simplicity is important to ensure understanding by the public. Inconsistency and a confusing strategy will make education and enforcement difficult. Consistency across the borough is important to avoid confusion for residents, and takes too much time to develop different rules for different areas. The strategy is overly complicated. The 2 statements in the survey contradict each other – how can speed management criteria apply across the borough, and yet sites for speed management measures be prioritised based on evidence? The questions are misleading. (9 comments)

The same speed limits should apply across all of Cheshire to avoid confusion. Consistency would be having the same speed limits across the whole borough. Traffic

speeds in built-up areas need to be standardised to leave no room for doubt. Imposing stronger traffic management measures and lower speeds in some areas and not others will direct traffic towards less-managed streets. (6 comments)

<u>Follow national and international guidance and schemes</u>. 20mph zones have already been adopted elsewhere, without the need for assessments. See Manchester, Lancashire, Cheshire West, and Scotland for examples. (8 comments)

<u>Consistency would come with time</u> – Manchester's scheme had a "dreadful" start but is doing well now. (1 comment)

# Theme: Doubts about the accuracy of data used to inform decision making (11 comments)

Doubts about the accuracy of data held and how comprehensive it is. Things can be missed if we rely solely on data. For example, while there are accident records, near misses are not recorded, and not all accidents or injuries are reported. Also existing speed data fails to account for the fact that vulnerable road users may already be discouraged from using the roads, therefore the data is biased in favour of car use. Evidence also needs to be objective and put into context e.g. a drunk driver who crashes is more likely due to drink rather than the need to reduce speed on a road. Also how are current speeds being measured, as there are few speed cameras around? (11 comments)

# Theme: Other comments (22 comments)

- Spend money on improving other things instead such as on improving the condition of the roads, cleaning the streets, fighting crime. (7 comments)
- Speed limits should not be set depending on current speeds. (3 comment)
- There is potential in future for councils to be given the power to enforce speed limits is CEC aware of that? (1 comment)
- Speed limits should alter for different times of the day why should people drive
   20mph past a school outside of school hours? (1 comment)
- Apply criteria consistently, so long as geographical and demographic variations are taken into account (1 comment)
- Consistency shouldn't mean taking away what is already in place (1 comment)
- Whilst the consistent application of criteria is generally considered to be a fair approach it doesn't take into account the individual variables that may exist, there needs to be a sensible approach to dealing with exceptions. (1 comment)
- Speed limits should be set based on safety (1 comment)
- Speed limits should be set based on what's best for traffic flow, and keeping traffic moving efficiently (1 comment)
- The views of local residents and their experience SHOULD NOT be taken into account when making decisions on speed limits (1 comment)
- Publish up to date information on traffic speeds in local areas (1 comment)

- Areas should be pedestrianised based on potential community benefits (1 comment)
- Fixed SIDs are important for the collection of data so shouldn't be removed. (1 comment)
- A strong policy is needed for safety and the environment (1 comment)

# Comments made about 20mph and 40mph zones

The following comments we remade in response to closed questions asking how strongly respondents agreed or disagreed with sections in the strategy on

- ...20 mph areas?
- ...40 mph areas?

Comments have been summarised and grouped together into the following themes.

# Theme: Enable communities to create 20mph zones more proactively (46 comments)

Opposition to the concept that 20mph areas will only be considered in locations which are already self-compliant. Respondents were opposed to the idea that "mandatory 20mph speed limits and zones will only be considered in those locations that are generally self-compliant due to the nature of the road layout". They felt that 20mph zones are needed in places not just where speeds are already below 28mph, and would prefer a more proactive approach where 20mph is considered desirable even if average speeds are higher. They felt 20mph areas ought to apply to areas where there are high concentrations of vulnerable road users, regardless of current speeds. They felt decisions on where to locate 20mph areas should be based on environment, pedestrians and cyclists, and not cars, and they should be considered for areas where promotion of active travel or local community environment improvement will be achieved. They stressed that if speeds are kept at a higher level then active travel will be discouraged and the higher speed limit will seem to be appropriate and therefore "the motorcar wins". Surely one of the functions of a speed management strategy should be to enable speed to be reduced where there is a need? (33 comments)

Local communities should be given more influence when developing local speed limits. Implementation of 20mph zones should not be dependent on collecting data on all roads, this would take years and the resource is not available – Local Councillors know the problem areas and what the residents want. Where there is a clear strength of feeling amongst residents in a local area that they would like to see speed limits reduced, Cheshire East Council should work with them to achieve this where practicable. (6 comments)

There are too many bureaucratic obstacles in the strategy to bringing in 20mph limits. Because of the bureaucracy proposed 20mph areas will be refused or dismissed when

they really will contribute to improved safety and perception of safety by pedestrians and road users other than motorists. In London most of the centre is 20mph, and I cannot believe they followed as bureaucratic a process as proposed – they just did it. The conditions for a 20mph speed limit to be imposed are too restrictive and too easily dismissed. (5 comments)

<u>Improve the communications process for communities</u> – It's not clear how people suggest areas for 20mph zones. There needs to be a clear communications information in the strategy about how zones will be implemented and why. (2 comments)

# Theme: The introduction of speed measures should be evidence based and consistent (14 comments)

<u>Policies should be evidence based</u>. Areas should be evaluated on needs and merits, on population density etc. (5 comments)

Speed limits should only be introduced in areas where people are currently speeding, and according to the unique issues at each particular location. All types of road and areas cannot be bunched up together easily. Roads that farmers need to access farms cannot be bunched up with other rural or urban roads for example. (6 comments)

<u>20mph zones have only been introduced in areas where pressure groups have demanded them</u>. There are several examples where they have been applied to major through routes rather than using the criteria listed. (3 comments)

# Theme: People drive too fast and existing speed limits should be enforced (46 comments)

<u>Enforcing existing speed limits should be the priority</u>. If the police do not have capacity to enforce speed limits, it should be achieved through greater use of cameras. (24 comments)

<u>People drive too fast on rural roads</u>, and they are unsafe for pedestrians, cyclists and equestrians – people are scared to use rural roads because of the speed cars drive on them, including up to 60mph. Respondents felt that rural areas that don't meet the criteria are put at a significant disadvantage. Some felt rural villages should also be designated as 20mph areas. Generally some felt the council must clamp down on high speed, especially to promote Active Travel. (19 comments)

People will drive as fast as the speed limit that is set (3 comments)

## Theme: Cars dominate our environments (10 comments)

<u>Cars need to be stopped from dominating our environments.</u> Walking, cycling and public transport should have greater focus. How will the strategy support recent

changes to the Highway Code, including in rural areas? The strategy prioritises the needs of motorists to get somewhere faster rather than the needs of pedestrians and cyclists to be safe. (8 comments)

Pedestrianise town centres more (2 comments)

# Theme: The strategy is complex, contradictory and not flexible enough (21 comments)

The guidelines in the strategy are contradictory and not applied consistently. The strategy should be clear on what principles are to be applied, and contradictory statements should not appear without explanation of which principles will take precedence. Examples of contradiction included (8 comments):

- Burley Dam has a 30mph limit on the A525 whereas it is 40mph on the A530
- The 20mph zone in Sandbach seems to fly in the face of the stated strategy
- According to your criteria, London Road in Stapeley should have a higher speed limit
- Section 7.8 sets out a 'speed limit framework' which 'serves as a guide for the identification and selection of speed limits'. This then explains '20mph speed limits and zones can be considered in built up areas where there are high concentrations of vulnerable road users where vehicle movement is not the primary function'. If the requirement for vehicle movement not to be the primary function is applied, then there are many areas where walking and cycling would be encouraged by a 20MPH speed limit which will not be considered. This is at odds with statements in sections 7.5 and 7.9 and appendix F where pedestrian potential for active travel footfall on narrow footways in historic areas is acknowledged.
- Page 29 refers only to rural settings and appears not to comply with the Speed Limit Framework outlined on page 26.

<u>The strategy is long, complex and complicated</u>. It would benefit from being in a more 'reader-friendly' format. (6 comments)

The strategy seems very prescriptive, and needs to be more flexible as it doesn't cover every eventuality. The strategy needs to allow greater flexibility, for example to enable rural roads to be reduced to 30mph between villages which are next-door with only a few hundred metres in between, and where the road is used by walkers. (5 comments)

<u>The strategy seems to be "anti-20mph"</u>. The strategy reads as if it is designed to impede, deter or prevent change. The approach of the SMS is limited to the ineffective street by street approach. (2 comments)

Theme: Other comments (16 comments)

- More and clearer road signs are needed. (2 comments)
- Education of drivers and cyclists is needed rather than restrictions and enforcement. People should be encouraged / educated to drive according to the conditions they encounter. (2 comments)
- Equestrian business is important in rural areas and therefore needs to be taken into account in this strategy. As a horse rider I find drivers are driving far too fast on rural roads which often are narrow and have bends. (2 comments)
- Mobile speed vans are ineffective at stop speeding, they only collect revenue for the police. The police should solve crime and not generate revenue from speeding tickets. (2 comments)
- I am concerned about the application of the very loose term 'active travel'. It has certainly been used completely inappropriately in Sandbach. The residual of the mess is still on Sandbach streets. (2 comments)
- Cheshire East Council does not listen to feedback from consultations. (1 comment)
- Current limits that change a lot in a short distance are confusing and unnecessary (1 comment)
- Traffic is a problem in Disley (1 comment)
- Active speed control measures through deterrents tend to have a greater impact and longevity. (1 comment)
- Acoustic cameras are needed (1 comment)
- How often will the strategy be subject to review? (1 comment)

# **Comments made about Exceptions**

The following comments we remade in response to an open question asking if respondents felt there were any other Exceptions that should be considered, other than the 4 listed in the draft strategy.

Comments have been summarised and grouped together into the following themes.

# Theme: New exceptions are needed... (81 comments)

<u>In potential Active Travel areas</u> – Walking and cycling exceptions. To ensure Highway Code requirements can be met or, in extreme circumstances where the existing speed creates a danger. Vulnerable users must be protected. (29 comments)

<u>In all residential areas</u>. All residential areas should be 20mph or should be treated as exceptions, especially as they change the nature of the surrounding area, and not just in new housing developments, Narrow pavements in urban areas and areas with high pedestrian volumes (e.g. shoppers and tourists) should be treated as exceptions. (26 comments)

<u>Depending on local requests from Town and Parish Councils, Councillors, and local residents</u>. If local people want the road speeds to be reduced you should have a very, very good reason to deny them this. (8 comments)

Around all schools. (7 comments)

<u>In areas with noise problems</u>, to curtail noisy cars (6 comments)

On rural roads that are too narrow for HGVs or that don't have pavements (3 comments)

Where road changes will lead to knock on speed effects on other roads, or where roads are used as "rat runs" or diversions. (2 comments)

Theme: Four exceptions are too many, further exceptions are not needed (26 comments)

<u>Four exceptions are too many – the fewer exceptions the better to help fairness and consistency</u>. Too many different rules makes things confusing. Speed limits that change too frequently create confusion. The number and proliferation of signs creates distraction from watching the road properly. We don't need speed limits going up and down in short succession. There is too much bureaucracy / the form is too complicated. (24 comments)

Cynicism about the motives for the exceptions and how they will be used. (1 comment)

These are detailed questions which should be handled by experts. (1 comment)

Theme: Air Quality Management Area (AQMA) Exceptions (21 comments)

<u>Electric car technology is making air quality less of an issue</u>, as is start stop technology. Have diesel / petrol engine exclusion areas. (7 comments)

<u>Slower driving does not help improve air quality</u> – this disputes the statements made in 7.13. Reducing speeds increases emissions. The information provided about air quality and pollution is incorrect. It is not the speed of the vehicle, it is the efficiency of the engine in different engine rev ranges. It happens that most vehicle manufactures design their vehicle to operate at peak efficiently at 50 to 55 mph. How does slower driving help? As people slow down they also speed up often aggressively because they have been restricted adding and extra workload to an engine. It is better to keep a consistent speed. (6 comments)

<u>Lack of faith in the council's approach to air quality</u> given past scandals (3 comments)

Air quality is an important issue. (2 comments)

<u>Detail on AQMAs seems ambiguous</u>. When will AQMAs be applied? (2 comments)

Experience tends to suggest AQMAs attract average speed cameras and as such the introduction of the areas are largely viewed by the public as cynically wrapping a revenue earring exercise in an environmental jacket (1 comment)

# Theme: Buffer or Shoulder Zone Exceptions (1 comment)

These exceptions are important. (1 comment)

# **Theme: Planned Development Exceptions (4 comments)**

<u>Limits implemented when 50% of houses on new developments are occupied seems arbitrary, why not apply limits on the first occupation?</u> (2 comments)

The default speed limit should be 20mph not 30mph. The current guidance says new residential roads will be designed for 20mph, but that the limit will be 30mph, which makes no sense. (2 comments)

# Comments made about other categories for the prioritisation matrix

The following comments we remade in response to an open question asking if respondents felt there were any other categories or topics be considered in the prioritisation matrix.

Comments have been summarised and grouped together into the following themes.

## Theme: Section A – Casualty Reduction (21 comments)

New categories in this section should include:

Near misses – These should be counted as well as actual collisions (6 comments)

General comments on this section included:

- There should be more focus on this section (7 comments)
- We should not wait until there's an accident before making changes the emphasis of the whole strategy needs to change (3 comments)
- Fatal accidents should be weighted higher (3 comments)
- There should be less focus on this section (1 comment)
- Areas with at least 2 incidents in the last 3 years should be considered high risk (1 comment)

# Theme: Section B – Congestion (26 comments)

New categories in this section should include:

• The amount of pavement parking and bus stops in an area (7 comments)

- The number of HGVs and farm vehicles using a route (4 comments)
- The number of cyclists and pedestrians using an area (3 comments)

### General comments on this section included:

- There should be more focus on this section (4 comments)
- There should be less focus on vehicle congestion, as higher congestion causes slower speeds (3 comments)
- The current infrastructure cannot handle current traffic levels (2 comments)
- Coordinate with route planners / Sat Nav companies to manage traffic more efficiently (1 comment)
- Consider the impact of bus route changes (1 comment)
- Traffic density shouldn't be calculated based on a single day reporting or incident (1 comment)

# Theme: Section C – Accessibility and Capacity (23 comments)

New categories in this section should include:

- The number of schools and hospitals in the area (8 comments)
- The number of pavements and cycle lanes in the area (3 comments)
- The number of pedestrian crossings in the area (2 comments)
- The number of additional on road hazards e.g. pedestrians on narrow rural roads / horses / tractors (2 comments)

## General comments on this section included:

- Current traffic speeds are felt to be a barrier to Active Travel (pedestrians and cyclists) – if traffic speeds were lower levels of Active Travel might be higher (6 comments)
- Local engagement should be included in this category (1 comment)
- There should be more focus on this section (1 comment)

# Theme: Section D – Amenity (40 comments)

New categories in this section should include:

- The amount of Active Travel in the area / How much of a priority it is to have Active Travel in the area (28 comments)
- The amount of equine traffic in an area (3 comments)
- The number of schools in the area (3 comments)
- The potential impact of future planning changes e.g. HS2 (3 comments)
- Whether there are any large event venues or events in the local area (2 comments)

#### General comments on this section included:

There should be less focus on this section (1 comment)

# Theme: Section E – Neighbourhood Engagement (13 comments)

#### General comments on this section included:

- There should be more focus on this section (10 comments)
- There should be less focus on this section / this category is not needed (2 comment)
- Strategies should be devolved to town councils (1 comment)

# Theme: Section F – Local Concern (32 comments)

#### General comments on this section included:

- There should be more focus on this section (23 comments)
- There should be more local influence over the Speed Management Group (SMG) (5 comments)
- Engagement rates in deprived areas are low and therefore a concern for their ability to influence (2 comments)
- There should be less focus on this section / this category is not needed (1 comment)
- This does not match / compliment the CEC Transport Strategy (1 comment)

## Theme: New suggested categories (10 comments)

- The local geography of the area should be a new category e.g. blind bends, lack of pavements (4 comments)
- The level of traffic noise should be a new category (3 comments)
- The amount of speeding in an area should be a new category (3 comments)

# Theme: Other comments (75 comments)

- Agree with lowering speed limits More efforts to reduce speeding are needed, including speed limits, speed cameras, fines for speeding, road furniture to slow traffic (22 comments)
- Disagree with lowering speed limits (4 comments)
- Focus on improving air quality and reducing emissions (14 comments)
- Focus on road repairs to reduce accidents (6 comments)
- Focus on improving public transport (1 comment)
- General disagreement with the prioritisation matrix (8 comments)
- General satisfaction with the prioritisation matrix (5 comments)
- No one category should have priority over the other (3 comments)

- The measures not financially feasible (1 comment)
- Prioritise access for emergency vehicles (2 comments)
- The Engineering section overall should be less of a focus (2 comments)
- Refer to updated DfT guidance (2 comments)
- Clearer road markings needed (1 comment)
- Too much focus on personal vehicle pollution and not enough on commercial vehicles (1 comment)
- Speed bumps should not be used as they cause acceleration (1 comment)
- Focus should be on safety technology e.g. speed limiters, seat belts (1 comment)
- CEC should stop using tarmac for environmental reasons (1 comment)

# Theme: Comments on the consultation (17 comments)

- The consultation, including the consultation document, is too complicated (7 comments)
- The strategy and the consultation is a waste of CEC resources (7 comments)
- Need for less specific strategy (3 comments)

# Comments made about why people disagree with relative weightings

The following comments we remade in response to an open question asking why people disagree with the relative weighting given to each of the factors / topics in the prioritisation matrix.

Comments have been summarised and grouped together into the following themes.

## Theme: Section A – Casualty Reduction (53 comments)

- Scoring is needed for near collisions or incidents without any casualties (20 comments)
- Scoring should be higher generally for this category (2 comments)
- A.1 Scoring should be higher (8 comments)
- A.1 Definition needs to be given to what constitutes a 'serious' injury (4 comments)
- A.1 The serious injury score is too high (1 comment)
- A.2 Scoring is too open to interpretation (what counts as a speed related incident?) (12 comments)
- A.2 Scoring should be lower (2 comments)
- A.2 Scoring should be higher (1 comment)
- A.3 Scoring should be higher (1 comment)
- A.4 Scoring should be higher (1 comment)
- A.5 Scoring should be lower (1 comment)

# Theme: Section B – Congestion (1 comment)

Scoring for this section should be reduced (1 comment).

# Theme: Section C – Accessibility and Capacity (3 comments)

- C.14 Scoring should be higher e.g. 20 (1 comment)
- Scoring should be included for footpath condition (1 comment)
- Scoring should be included for nearby crossing points (1 comment)

# Theme: Section D – Amenity (0 comments)

No comments made.

# Theme: Section E – Neighbourhood Engagement (7 comments)

- This category generally should score higher (3 comments)
- Reduce/remove scoring from this category generally (1 comment)
- Unsure how information for this category would be collected (1 comment)
- E.20 MP scoring should be reduced/removed (1 comment)
- E.21/22/23 Councillors scores should be increased to 30 (1 comment)

# Theme: Section F - Local Concern (10 comments)

- This category generally should score more highly (5 comments)
- Reduce/remove scoring from this category generally (4 comments)
- Unsure how information for this category would be collected (1 comment)

## Theme: General reasons for disagreeing with weightings (75 comments)

- Rather than accessing risk to decide whether to bring in speed control measures, measures should be taken now instead to reduce speeding across the board (25 comments)
- A category and scoring should be included for Active Travel users (11 comments)
- Needs to be consideration of what caused the incident, not just the results (7 comments)
- Scoring does not consider local conditions, blind bends width of roads or pavements, speed limits etc (5 comments)
- Is the scoring 'nationally agreed' upon? (4 comments)
- Areas of high incidents should have the road layout reviewed / altered (3 comments)
- Scores generally too low (3 comments)

- Include category and scoring for air pollution and its effects on health (3 comments)
- Include category and scoring for nearby school / carehome / hospital etc. (3 comments)
- Scoring should be up to interpretation within a set limit for each item (2 comments)
- Respondent knows person(s) involved in previous incident (1 comment)
- Replace junctions with mini roundabouts (1 comment)
- More car free zones (1 comment)
- Scoring should not be over thought/valued when making decisions later (1 comment)
- Strategy doesn't go far enough, total overhaul needed (1 comment)
- Refers to 20s Plenty Campaign response to strategy (1 comment)
- Risk of incidents on some roads dissuades there use (1 comment)
- Record of incidents need to be taken before and after strategy to measure its success (1 comment)
- Refer to DfT guidance (1 comment)

# Theme: Other comments (32 comments)

- The strategy document is too complicated, it's not clear what scoring is for each item (27 comments)
- The consultation is too complicated (4 comments)
- Not confident of CEC investment in scheme (1 comment)







