OBJECTIONS

<u>Ref</u>	Comment Received	No of Times Made	Officer Comment
	Objector objects to the proposal to introduce a 30 mph restriction in St Edith's Marsh, as they are not aware of any collisions either prior to the 40 mph or subsequently.		The review identified four collisions within the extent of the proposed 30 mph restriction. This equates to a collision rate of 21.6 collisions per 100 million vehicle kilometres. This relates to the six year period 2002 - 2006. When considering the justification of a 30 mph
1		1	restriction, the published criteria in Traffic Advisory Leaflet 01/04; Village Speed Limits, relates to the number of frontage residential properties and their density. Whilst the recorded collision data remains useful in assisting in decisions where the criteria may be considered marginal, the level of development in St. Edith's Marsh does not require it to be taken into consideration.
	Objector objects to the proposal to introduce a 30 mph restriction in St. Edith's Marsh, as they do not believe the village meets the		The guidance provided to Highway Authorities on the setting of speed limits is provided in Department for Transport Circular 01/06 Setting Local Speed Limits. When considering the criteria for a 30 mph limit in a
2	criteria for a 30 mph restriction as the development is on one side of the village.	1	village environment, this recommends the use of the guidance provided in Transport Advisory Leaflet 01/04 Village Speed Limits. This stipulates the requirement for a minimum of 20 residential properties fronting the highway over a distance of 600 metres. Development does not have to be on both sides of the carriageway.
			St Edith's Marsh has been assessed against these criteria and considered to conform to the guidance.
3	Objector considers the imposition of the speed limits will result in an increase in speed between St. Edith's Marsh and Roughmoor Cottages.	1	It is accepted the imposition of a lower speed limit may introduce a small level of delay. A 10 mph reduction through the village of St Edith's Marsh would equate to an increased journey time of approximately 22 seconds.
			It is not considered the increase in journey time will result in motorists exceeding the national speed limit between the termination of the restriction and the properties known as 'Roughmoor Cottages'.
4	Objector does not believe the proposal is appropriate and would like to see either a 30 mph or 40 mph restriction. They consider there is sufficient justification based	1	The guidance provided to Highway Authorities on the setting of speed limits is provided in Department for Transport Circular 01/06; Setting Local Speed Limits. The review has been undertaken in accordance with guidance provided.
	on the presence of the school and its patronage, and the presence of other residential access in close proximity.		To permit the introduction of a 30 mph requires there to be substantive frontage development with direct access. This development needs to equate to a minimum of three properties per 100 metres. There

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			are currently seven properties which could be considered to directly front and access the A342 between the Rowde and St Edith's Marsh, a distance of approximately 860 metres. The level of development is substantially below that expected within a 30 mph and whilst special consideration can be given for a school, the lack of development and other environmental triggers are insufficient to reinforce to motorists that a 30 mph is in force.
			Turning attention to the suggestion that a 40 mph would be more appropriate.
			The criteria for a 40 mph speed limit is given as a route with:
			High number of bends, junctions or accesses, substantial development, where there is a strong environmental or landscape reason, or where the road is used by considerable numbers of vulnerable road users. Villages where the criteria for a 30 mph limit are not met.
			Given the lack of substantial frontage development and the low number of junctions / access, combined with the nature of the school traffic being such that there are very few vulnerable road users in this area, it is considered that the criteria for a 40 mph limit are not met.
			Whilst those for a 50 mph limit are:
			Lower quality roads which may have a relatively high number of bends, junctions or accesses. An accident rate higher than 35 per 100 million vehicle kilometres and/or mean speed already below 50 mph.
			When considering the criterion for a 50mph the presence of some accesses, the sporadic development, the recorded collision rate 39.9 per 100 million vehicle kilometres and existing mean vehicle speeds of 57mph, it is considered that the introduction of a 50 mph limit is the appropriate recommendation.
5	The objector objects on the grounds that the vast majority of motorists use the road safely with the current limits and that the use of signage	1	Guidance on setting speed limits is provided to Highway Authorities by the department for Transport in Circular 01/06 Setting Local Speed Limits. Following the publication of the document, all
	would be more effective than the imposition of a speed limit.		Highway Authorities have been requested to undertake a review of restrictions in line with the guidance and implement the changes.

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			The guidance has been developed following research by the Department for Transport and other agencies inside and outside of government to develop guidance which improves the consistency of a speed limit nationally.
			The guidance takes into consideration the effect of surrounding environmental factors, road geometry, a road characteristics, collision rates and traffic makeup. It aims to introduce speed limits which are evidence led, self-explanatory and to reinforce people's assessment of a safe speed to travel.
			Wiltshire Council has completed this review utilising the advice contained within the Circular 01/06.
			The use of speed limits to highlight the presence / or mitigate the effect of isolated hazards such as a bend, junction, etc. is considered an inappropriate use of a speed limit. Where isolated hazards exist on the network these should be resolved using specific engineering measures. Speed limits are designed to provide motorist with an assessment and awareness of the road environment and assess their own speeds.
6	Objector questions the grounds on which the Order is being promoted – 'In the interest of Highway Safety'		The publication of Traffic Regulation Orders in accordance with the Road Traffic Act 1980 requires the promoting authority to identify the grounds by which the Order is being proposed. The list of approved reasons is predefined and not open to interpretation.
		1	The recommendations are a result of assessment in line with the Department for Transport Circular 01/06 Setting Local Speed Limits. One of the fundamental objectives of the guidance is:
			Continued reductions in the number of road traffic collisions, injuries and deaths in which excessive or inappropriate speed is a contributory factor.
			It is therefore considered appropriate for this particular statement of reason to be used for the promotion of the associated Traffic Regulation Orders.
7	Objector does not consider a reduction in speed limit is needed as hundreds of thousands of journeys happen safely every year.	1	Guidance on setting speed limits is provided to Highway Authorities by the Department for Transport in Circular 01/06 Setting Local Speed Limits.

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8	Objector believes safety will not be improved as a result of the limits and that other targeted measures would be more effective, such as signing.	1	Following the publication of the document, all Highway Authorities have been requested to undertake a review of restrictions in line with the guidance and implement the changes. The guidance has been developed following research by the Department for Transport and other agencies inside and outside of government to develop guidance which improves the consistency of a speed limit nationally. The guidance takes into consideration the effect of surrounding environmental factors, road geometry, road characteristics, collision rates and traffic makeup. It aims to introduce speed limits which are evidence led, self-explanatory and to reinforce people's assessment of a safe speed to travel. Speed limits are designed to provide motorist with an assessment and awareness of the road environment and assess their own speeds.
9	Objector considers the collision is a result of poor driving rather than speed related.	1	Collisions often occur due to many contributing factors. It is very difficult to pinpoint one particular factor which contributes to the causation and severity. It is often a combination of many. Driver error is a
10	Objector considers the collisions that have been recorded are a result of drivers not adhering to current limits and consequently the proposals will have little effect.	1	significant factor in many collisions; however, the consequences are often compounded by inappropriate speed for the prevailing conditions. It is accepted that the imposition of a speed limit will not remove driver error; however, the introduction a speed limit does provide road users with additional information which they are able to use when assessing what they consider as a safe speed to trave within the conditions.
11	Objector considers the reasoning for the limits is unclear and that is a 'kneejerk' reaction to the fatal collision in 2011.	1	The proposal has been developed following the publication of guidance on the setting of speed limits by the Department for Transport. The guidance known as Circular 01/06: Setting Local Speed Limits was published in 2006 and contained a request for all Highway Authorities to review existing speed limits on the A and B class network. Wiltshire Council undertook this review during 2008/9 and published the results to all Parish and Town Councils in 2010. The review recommended a 50 mph restriction and was published prior to fatal collision at Rowdeford which occurred in 2011

SUPPORT

Ref.	Comment Received	No of Times Made	Officer Comment
S1	Some of the proposals have been long awaited.	1	Comments have been noted.
S2	Supporter is happy with the proposed restrictions for Bromham and along the A342 at St Edith's Marsh.	1	Comments have been noted.
S3	Supporter agrees with the proposals	1	Comments have been noted.

GENERAL

Ref.	Comment Received	No of Times Made	Officer Comment
G1	Commenter has identified an issue with the labelling on site notice which appears to identify a former road, which has subsequently been stopped up as the A3102.	2	This is an administrative error with the site notice plan. The route should have referred to the unclassified road no 966601. The road has not been used to identify any points within the order and is not considered to cause a future issue with identification of the proposed limits.
G2	Correspondent has asked how the proposals will be monitored and enforced given the unsuccessful monitoring of the existing 40 mph.	1	The Police are the sole agency responsible for the enforcement of speed restrictions. Wiltshire Council is unable to influence where and when enforcement activities take place. Following the cessation of the former Safety Camera Partnership it was recognised there remained an issue with enforcement particularly give the previous levels. As a method of mitigating this impact, Wiltshire Council and Wiltshire Police have collaborated to establish a community speed watch initiative for locations where speeding is an ongoing problem. If there is a desire to participate in or establish a community speed watch group, in the first instance an issue must be raised with the Community Area Board. This will initiate a survey to establish whether there is an evidential speeding issue. You can raise an issue either by visiting the Wiltshire Council website at http://www.wiltshire.gov.uk/council/areaboards.htm or by contacting your local Community Area Manager for the Devizes area.