

Comments and Officer comments

<u>Ref</u>	<u>Comment Received</u>	<u>Comment type</u>	<u>Officer Comment</u>
1	<p>I am writing in support for the proposed 20mph speed limit Jones Hill & Lane that connects Bradford on Avon to Upper Westwood.</p> <p>As a resident on the Upper Westwood end of this road (106a Cottles Gardens) we use the road and feel strongly that a 20mph limit would make it safer. Delivery vehicles often speed along the road which is used by many horses, walkers and cyclists. It is often used as a cut through route by large lorries which are unsuitable for this single track road and would ask that you consider restrictions to help this problem too.</p>	Support	<p>Comments of support are noted</p> <p>The introduction of measures to control vehicle movements on Jones Hill are outside of the scope of this project. However, a request can be made via the Area Board issues system for consideration by the Bradford on Avon Community Area Transport Group. The 'submit a 'community issue' sheet can be found on the Wiltshire Council website within the Area Board section.</p>
2	<p>I fully support a 20mph limit in all areas of the town. It is a shame that the proposed order does not cover the main through route - Trowbridge Road is becoming increasingly dangerous, and it seems only a matter of time before pedestrians are injured, and not just the loss of household pets and the few hedgehogs that might remain. Cars accelerate out of St Margaret's Street as it is. Air quality is getting much worse too.</p>	Support but wants more	See substantive comment – Extent of proposals
3	<p>I am writing to offer my enthusiastic support for the introduction of a 20mph. speed limit in the above areas of Bradford, and indeed all areas in the proposal. I know from discussion with neighbours that there is general delight and relief at what has long been overdue for consideration, but we do wonder how the new regulations could be enforced.</p> <p>Since I came to Southleigh 17 years ago, Jones Hill has changed from a quiet country lane to a</p>	Support	<p>Comments of support are noted</p> <p>Enforcement of all speed limits rests with the Police. The adopted Council policy on 20mph speed limits (in line with DfT guidance) only allows the introduction of 20mph speed limits on roads with mean speeds of 24mph or less. This is to avoid unnecessary additional enforcement by the Police</p>

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	<p>"rat-run", frequently used by vehicles of unsuitable size who have difficulty in manoeuvring. As an example, not long ago as I drove up the Hill towards home, I came face to-face with a tractor towing a bank-to-bank width rotovator. He already had a three-car tail, and so, very shortly, did I. The ensuing chaos took ages to clear, as no-one seemed willing to back up.</p> <p>I have never understood why there is no speed limit at all on Jones Hill, which would certainly benefit from having any or all of the steep hill/single-track road/bends for X miles hazard signs. Perhaps this might also be taken under consideration? Southleigh itself is also dangerous with its gradient and blind bend, which unfortunately seem to be regarded by one or two drivers as a challenge to be taken as fast as possible.</p> <p>A more recent problem in this area of Bradford has developed in Moulton Drive, which is being used both day and night as a car park not only for cars, but also for large coaches, caravans and trade vehicles. This leaves long stretches of single track road where it is not always possible to see oncoming vehicles, a particular hazard at night. Some way of limiting this use, either time- or space-based, is desperately needed. A survey of users would be an informative and interesting start.</p> <p>I wish you every success with the proposed plans. I am copying this letter to Bradford Town Council, who have distributed a useful leaflet to all involved.</p>		<p>The introduction of measures to control vehicle movements on Jones Hill are outside of the scope of this project, however a request can be made via the Area Board issues system for consideration by the Bradford on Avon Community Area Transport Group. The 'submit a 'community issue' sheet can be found on the Wiltshire Council website within the Area Board section.</p> <p>Proposals to control parking on Moulton Drive are shortly to be brought forward by the Council and will be subject to their own formal consultation process.</p>
4	<p>I support all of the 20 MPH limits proposed on the roads shown. In addition I request 20 MPH limit on entire length of Woolley Street and Woolley Terrace. Also extend 20 MPH limit requested on the following: New Town (Road), Belcombe Road from</p>	<p>Support but wants more</p>	<p>The upper length of Woolley Street and the full length of Woolley Terrace are already subject to 20mph speed limits.</p> <p>See substantive comment – Extent of proposals</p>

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	its junction with New Town as far west as Belcombe Court, entire length of Wine Street, Winsley Road (B3108) from its junction with A363 going west as far as the junction with Churches, entire length of Churches.		
5	I have studied your proposals for a 20 mph limit on parts of the road network in the southern area of BoA. Whilst I would support the lengths of roads considered it would seem to me logical to have included that portion of the town which is most trafficked, both by pedestrian and by vehicular traffic. That is the area over the Town bridge. Maybe the County Council Traffic Engineering team could give further consideration, after surveying the location in question, taking into account pedestrians who require walking assistance and mothers with pushchairs containing two small children and combined with taking into account the overhang of vehicles bodies and wing mirrors beyond the kerbs on both sides of the road.	Support but wants more	See substantive comment – Extent of proposals
6	I am in favour of reducing the speed limit to 20 mph on all residential streets in Bradford on Avon. I would then like to know that these limits are being enforced!	Support	Comments of support are noted Enforcement of all speed limits rests with the Police. The adopted Council policy on 20mph speed limits (in line with DfT guidance) only allows the introduction of 20mph speed limits on roads with mean speeds of 24mph or less. This is to avoid unnecessary additional enforcement by the Police
7	I would not support a 20 mph speed limits in the town for the following reasons: 1. Drivers in built up areas should be looking at their surroundings and hazards around them rather than be concentrating on the speedometer, trying to achieve a low speed limit. 2. This will cause confusion as different speed limits in various areas of town 3. I would like to see the evidence that 20mph zones make safer roads as this is only true if drivers comply I would suggest that most will not unless police time is used to strictly enforce, it would be	Objection	Drivers have to take responsibility for all aspects of motoring when they are in charge of a vehicle. It is accepted that adhering to a speed limit is one of these but this is no different than any other level of limit. The limits will be clearly notified to drivers so there should be no confusion. Department for Transport guidance states ' <i>Research shows that on urban road with low average traffic speeds any 1mph reduction in average speed can reduce the collision frequency by around 6%</i> ' The adopted Council policy on 20mph speed limits (in line with DfT guidance) only allows the introduction of 20mph speed limits on roads with mean speeds of 24mph or less. This is to avoid unnecessary

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	<p>better in my opinion to spend the money that will be invested in signage in the local police to enforce the 30mph</p> <p>4. This will create additional signage in our beautiful town. We should be removing this eyesore rather than adding to it</p>		<p>additional enforcement by the Police</p> <p>The new 20mph limit will require additional repeaters throughout the length of the limit as well as the terminal signs. This is dictated by national legislation on the signing of speed limits. However the number of repeater signs will be kept to the minimum required and where possible existing street furniture will be used for mounting purposes.</p>
8	<p>The proposed 20mph scheme, as it stands, does not have our support.</p> <p>We believe it unviable to make some roads 20mph yet exclude others. For example the Trowbridge Road, the town bridge and the roads through the town centre - it appears that these are to remain at 30mph.</p> <ul style="list-style-type: none"> • The Trowbridge Road is THE major pedestrian access route for school children into Fitzmaurice school. The information leaflet itself states that 20mph limits are proposed on roads surrounding the town schools, yet this is clearly not the case looking at the proposal. There is an identical situation around Christchurch school where 3 of the 4 roads bordering the school are not included in the 20mph zone. To state that 20mph limits are proposed on roads surrounding the town schools is incorrect, misleading and cannot be used as a justification for the scheme. • Vehicles will reach the end of the St Margarets Street at the junction with the Trowbridge Road and ACCELERATE on exit. There is a 4 way junction at this point with a concealed entrance which has already resulted in several near misses with pedestrians and cars due to traffic accelerating out of St Margarets Street onto the Trowbridge Road. • Drivers will potentially be confused by multiple speed limits throughout the town. According to the proposals, on driving through the town the speed limit will change from 30mph to 20mph to 30mph and back to 20mph again. Far better to make the whole of Bradford on Avon a 	<p>Objection but wants more</p>	<p>See substantive comment – Extent of proposals</p> <p>The limits will be clearly notified to drivers so there should be no confusion.</p>

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	<p>universal 20mph so that you slow to 20mph on entering and national speed limits apply on leaving.</p> <ul style="list-style-type: none"> There are other measures alluded to in the proposal leaflet but not detailed. Parts of schemes should not be considered in isolation, <u>they need to be considered as a whole for that is how they will operate in reality.</u> <p>We do not support the scheme as it stands unless a universal 20mph is applied to the whole of BOA or the other measures that are mentioned as being underway are included for discussion in this proposal. Parts of schemes should not be considered in isolation, they need to be considered as a whole for that is how they will operate in reality.</p>		<p>Other measures being considered around Bradford on Avon are principally changes to parking restrictions and additional pedestrian (light controlled) crossings. In addition all the schools are being encouraged to review their School Travel Plans to help identify any additional measures that may help with safe journeys to school and less reliance on the car.</p>
9	<p>Regarding the proposed speed limits in Bradford on Avon, may I add : Belcombe Road and Newtown, which are often used as "rabbit runs" during rush hours. The narrow sections are particularly dangerous. Masons Hill, it is frightening to walk up Masons Hill on the pavement during the evening or when there is little traffic, cars going down the hill travel to fast.</p>	Comment	See substantive comment – Extent of proposals
10	<p>I am in favour of the proposal to reduce speed limits on the roads mentioned to 20mph, however I feel that the 20mph should be extended across the town and include the lower part of Woolley Street as traffic comes down the hill into town at speed making walking and crossing the road dangerous. Also New Road where traffic speeds seem to be very high. A 20mph town would be a much safer and pleasanter place to live!</p>	Support but wants more	See substantive comment – Extent of proposals
11	<p>I am against the proposal as I just feel it is complete overkill... whilst it may be beneficial on certain sections of 1 or 2 roads, turning the whole of Bradford on Avon into a 20mph zone is just</p>	Objection	See substantive comment – Extent of proposals

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	<p>completely unnecessary and would be a waste of money. It would just be frustrating. Crawling along Leigh Park Road at 20mph when there is absolutely nothing else on the road and not a person in sight, it's ridiculous!</p> <p>I think the proposal needs to be reviewed, and reduced to the main areas that would benefit, such as directly outside school entrances/exits and the main road running through the town and over the bridge, which is often busy with people crossing the road.</p> <p>Looking at the map, I can't work out what criteria the proposal has been based on as some of the roads included are right next to ones that aren't.</p> <p>It just feels a bit over the top to me.</p>		
12	<p>Bravo! Great to see sensible limits for residential areas being implemented.</p> <p>I hope we'll also see proposals for a new pedestrian/cycle crossings on Frome Rd near the Lock Inn, and on Trowbridge Rd near the St Lawrence junction.</p>	Support	<p>Comments of support are noted</p> <p>A signal controlled crossing is being installed on Frome Road near the Lock Inn</p> <p>The provision of a crossing near St Lawrence is being investigated.</p>
13	<p>Whilst I am glad that certain roads are being considered for the implementation of a 20mph speed limit, I think the area covered should be extended as soon as possible. All traffic on main roads into, through and out of Bradford needs slowing down.</p> <p>I acknowledge that traffic often travels slowly in the centre, but this means that drivers subsequently increase their speed to compensate for delays incurred.</p> <p>Winsley Road has lots of pedestrians walking along it to school and the pavements are narrow. Vehicles travelling along here, even at 30 mph, pose a significant threat. The same is also true for</p>	Support but wants more	See substantive comment – Extent of proposals

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	<p>Trowbridge Road.</p> <p>20 mph for the proposed routes is a step in the right direction but more needs doing.</p>		
14	<p>Extending and Introducing Double Yellow Lines for Kennet Gardens, Bradford on Avon</p> <p>In this submission, I refer to the Wiltshire Council Draft Plan sent by Bradford on Avon Town Council on 02 December 2016 to Kennet Gardens residents. The road leading to the School and Community Centre I have called Frome Road and not Kennet Gardens [The School's postal address is Frome Road not Kennet Gardens].</p> <ol style="list-style-type: none"> 1. I very much support the Traffic Order, but submit that Wiltshire Council has not fully appreciated the problems that face drivers, pedestrians and residents using Kennet Gardens. 2. The Order continues to allow unrestricted parking on the West side of Kennet Gardens [with one exception]. 3. This is a three car lay-by between 1 Kennet Gardens and the Air Cadets Hall. 4. This should be the only on-street permitted parking area in Kennet Gardens. 5. The double yellow lines should be extended down the West side of Kennet Gardens with the above exception in addition to the original proposal. 6. When vehicles are parked along the west side of Kennet Gardens, the road width is reduced. Kennet Gardens roadway is uphill from the Frome Road access, and is not straight. This means that the driver of a vehicle entering Kennet Gardens has a restricted view of any vehicle movements further up Kennet Gardens. Should another vehicle be moving down Kennet Gardens, it requires the 	Comments	<p>These comments relate to parking issues and waiting restrictions in Kennet Gardens and therefore do not relate to the advertised proposal for 20mph speed limits.</p> <p>Proposals to control parking in Kennet Gardens are shortly to be brought forward by the Council and will be subject to their own formal consultation process.</p>

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	<p>vehicle coming up to mount the pavement because there is insufficient room for two vehicles to pass safely without doing so if vehicles are parked on the West side of Kennet Gardens.</p> <p>7. Wiltshire Council has allowed the installation of sloping kerbs rather than vertical sided ones. This allows some drivers to maintain their speed when travelling on the pavement.</p> <p>8. Most van drivers, and some drivers of larger cars, have to mount the pavement if another vehicle is met coming down.</p> <p>9. There is one continuous pavement in Kennet Gardens [East side]. Pedestrians, particularly those who go to and from school, have no alternative designated path. Kennet Gardens is particularly busy with traffic at the start and finish of the school day.</p> <p>10. Permitting vehicles to park on the West side of Kennet Gardens obliges some vehicles to use the only pavement when passing others coming down Kennet Gardens. How can this be regarded as reasonable, satisfactory or safe by the Council?</p> <p>11. The narrowness of the Kennet Gardens roadway, restricted visibility [caused by parked vehicles and the bend in the road] and its short length question that even a 20mph limit is unsafe.</p> <p>12. There are short lengths of double lines either side of the entry to Kennet Gardens. These should be extended up and down Frome Road [ie the access road to the school] because parked vehicles substantially reduce visibility for drivers coming from, and to, Kennet Gardens. It is not unusual for drivers to ignore even these double yellow lines and in doing so making it even more unsafe for other road users entering or leaving Kennet Gardens as well as pedestrians.</p> <p>13. Traffic Notices should warn/advise drivers of larger vehicles that the designated turning area may make it very difficult to turn their vehicles around. They should be encouraged to reverse up</p>		

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	<p>Kennet Gardens.</p> <p>14. Wiltshire Council Refuse vehicles regularly and safely do this every week. 15.Many drivers turn their vehicles using the private drives on the East side of Kennet Gardens [Nos. 7A, 8 & 9].</p> <p>16. A very large proportion of drivers use Selwood Housing's private parking spaces in order to turn round.</p> <p>17. Some of these vehicles are in excess of the weight these drives are designed to withstand. Example - The driver of one large vehicle [Homebase] was moving my wheelie bin from my drive in order to use the drive to turn round before I stopped him. It took him over 5 minutes to turn his vehicle because of the vehicle's size and the restricted turning space at the top of Kennet Gardens.</p> <p>18. Occasionally, drivers choose to park their vehicle in the turning area at the top of Kennet Gardens because there are "no notices saying otherwise".</p> <p>19. The responsible authority for policing the abuse of double yellow lines at the bottom of Kennet Gardens/Frome Road is not enforcing the current restrictions.</p> <p>20. Violations of the existing regulations are common.</p> <p>21. Wiltshire Police have stated that its not their responsibility, yet Bradford on Avon Town Council wrote to Kennet Garden residents, some time ago, saying that it was.</p> <p>22. No enforcement has been observed except one "polite" request asking unauthorised drivers to stop using the Community Centre parking spaces.</p> <p>23. Vehicles frequently park on the only pavement in Kennet Gardens - Example, 4 cars parked on the pavement waiting to collect Air Cadets at approx. 9:20pm on Thursday 16 March 2017.</p>		

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	<p>24. The verges on the West side of Kennet Gardens [either side of the Air Cadets Hall] have been destroyed by parked vehicles over the years. If parked vehicles used the roadway, access and safety would be further compromised.</p> <p>If safety for pedestrians, particularly children, drivers and residents is paramount, please consider my comments.</p> <p>Sooner, or later, an incident of some kind will occur and it might be proved that Wiltshire Council contributed to such.</p>		
15	<p>As a resident in one of the roads affected I just wanted to say how very much I welcome this proposal. It is long overdue. It will serve to remind drivers that they are in residential streets and should take appropriate care. Thank you.</p>	Support	Comments of support are noted
16	<p>I have just received through my letter box the information leaflet regarding the proposed 20mph restrictions for Bradford-on-Avon. My joy turned to disappointment when I realised that you have not included Sladesbrook in your proposal. We live at no 5 and have reported a number of drivers to the police regarding incidents of speed on this road. Unfortunately without a non-related witness, the police are unable to formally proceed. We have children and until 18 months ago a dog, who was unfortunately run over outside our house.</p> <p>I have raised the possibility of have speed bumps along Sladesbrook but to no avail.</p> <p>Therefore I would you to reconsider adding Sladesbrook to your list for 20mph. If this is not done, I will be formally objecting to any change of speed for Bradford on Avon on the basis that it is not actually tackling one of the roads where injury is</p>	Objection but wants more	See substantive comment – Extent of proposals

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	<p>at greatest risk. I note incidentally that most of the roads which are much slower suburbs where exceeding 20 mph would be difficult, whereas Sladesbrook where the speed is exceeded regularly, is not included.</p> <p>If you are willing to reconsider and include Sladesbrook, please let me know and I will allow this initial objection to drop. If on the other hand this is not the case, I will be submitting and formal object against the whole scheme in Bradford on Avon for reasons stated above.</p>		
17	<p>My wife and I were delighted to see this proposed speed limit of 20mph in Avonfield Avenue, Bradford on Avon.</p> <p>We very much support all the designated streets proposed in this consultation and hope these limits will be imposed soon and enforced.</p>	Support	Comments of support are noted
18	<p>I am writing as a resident and prospective town council candidate to support the proposals for 20mph limits on various roads in Bradford on Avon, reference LJB/TRO/BRAD20.</p> <p>I believe the imposition of a 20mph limit will motivate drivers to abide by the law and make the town's streets safer. I appreciate all the work that has gone into preparing these plans and the years of campaigning by residents and local councillors.</p> <p>I would like to see 20mph limits imposed more widely, including on main roads in and out of town and will continue to support efforts to this end.</p> <p>May I also encourage the Highways Authority to work with the Police to take some enforcement action once these limits are in place.</p>	Support	<p>Comments of support are noted</p> <p>See substantive comment – Extent of proposals</p> <p>The adopted Council policy on 20mph speed limits (in line with DfT guidance) only allows the introduction of 20mph speed limits on roads with mean speeds of 24mph or less. This is to avoid unnecessary additional enforcement by the Police</p>
19			

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	<p>I am in receipt of the literature regarding the changes to local speed limits - long overdue in my view.</p> <p>I note that some streets are being assigned the 20 mph limit because they have a school entrance. Since this applies to Sladesbrook (there is a much used entrance to the primary school), I wonder why we have been excluded? Perhaps because you didn't know about it?</p> <p>Traffic drives at a pace along our road and there is the added danger from on street parking and a lack of patience on the part of drivers within the single file stretch.</p> <p>Please will you consider including Sladesbrook as a 20 mph road using the criterion of having a school entrance.</p>	Support but wants more	See substantive comment – Extent of proposals
20	<p>Having lived on the straight section of Leigh Park Road for 30 years I have noticed an increase in the number of cars driving up and down. Having witnessed one near miss of a car hitting ice and nearly going in the culvert, and helped to sort the aftermath of 3 cats killed on the road, including one of my own I am in support of the proposed 20 mph speed restriction, (next time it could be a child) . A reduction in the speed would hopefully make the road safer and quieter. I would hope that discreet signs would make drivers take note but, I am not sure how you are going to police it.</p>	Support	<p>Comments of support are noted</p> <p>Enforcement of all speed limits rests with the Police. The adopted Council policy on 20mph speed limits (in line with DfT guidance) only allows the introduction of 20mph speed limits on roads with mean speeds of 24mph or less. This is to avoid unnecessary additional enforcement by the Police</p>
21	<p>I would like Belcombe Road to be included in the new proposal, plus the other roads proposed and the ones suggested by the Bradford on Avon Preservation Trust.</p> <p>If I need more people on Belcombe to write to make sure this goes forward please email me.</p>	Support but wants more	See substantive comment – Extent of proposals
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	<p>Whilst I have no objections to the proposed 20mph speed limit restrictions I would like to draw your attention to some dangerous and obstructive parking that now occurs since the demise of the garages on Southville Road Bradford on Avon. There are a few cars that constantly park half on the pavement and half on the road on a bend of the road just opposite St Aldhelms sheltered house complex on Southville Road. At times there can be cars parked on both sides of the road comprising the width of the road but perhaps more importantly being parked half on the pavement it severely restricts the width of the pavement. I am able bodied and walking that way to work every morning I generally find myself walking on the road rather than squeezing though on half a pavement and avoiding the cars wing mirrors and swerving past wheely bins. As you may know the area has a sizeable proportion of elderly people so with walking aids, wheelchairs etc I imagine they must find it even more difficult to negotiate. Having said that if you were to view it during normal working hours it is probably clearer as people drive off to work.</p> <p>Perhaps it is a huge coincidence that since the garages have been demolished these cars are now parking as they do - I don't know but it do know it is endangering road users and pedestrians and I was always under the impression pavements were for pedestrians not cars.</p>	Support	<p>Comments of support are noted</p> <p>Parking on the footway or on a bend in the road could be considered to be an obstruction offence for which the Police are the enforcement authority. Concerns should therefore be reported directly to them.</p>
23	<p>As a resident of Bradford-on-Avon, and a road where a 20mph speed limit has been proposed, my view is that this amendment to the speed limit is unnecessary, and goes far beyond that needed to ensure safety of pedestrians in areas where they are at risk.</p> <p>Whilst the safety of pedestrians is paramount, I think Wiltshire Council also need to consider the needs of residents to move around, and for motorists passing through the area to get to their destination. In my</p>	Objection	<p>See substantive comments – Extent of proposals</p>

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	<p>own experience of trying to get to work in Bristol, increasingly I found that speed limits were being reduced in areas where it seemed unnecessary, and making it extremely difficult for myself to actually get to work in a reasonable time. The council need to consider the cumulative effect of reducing speed limits and the effect this has on people's ability to move around.</p> <p>In some areas where the speed limit had been reduced to 20mph I had cars overtaking me because I was travelling so slow. 20mph is practically stationary, and it is very difficult to keep a car running at this speed.</p> <p>The variation of speed limits means that one needs to be constantly checking the speedometer, which for many people means taking their eyes off the road, and having to concentrate more on keeping to the imposed speed, rather than actually driving and considering the road conditions, traffic and pedestrians around them.</p> <p>Then there is the question of enforcement. There is little point in having a 20mph speed limit if it is not enforced. Many people will break it, and some will be unlucky enough to be fined, where a speed check is being carried out. What message will this send to those drivers who are perhaps tourists visiting the area, or those for whom a moments lapse in concentration has resulted in a fine? They are likely to be put off visiting the area again or feel victimised. My preference would be for the existing 30mph speed limit to be enforced, rather than it reduced to 20mph.</p> <p>In summary I feel that a reduction to 20mph is only really necessary around schools at certain times of day, and other times is a hindrance to residents and motorists. I therefore object to the proposal.</p>		<p>Wiltshire Council's Policy on 20mph speed limit restricts their use to those areas where considerable numbers of vulnerable users are present and actual driven speeds are already low. This is to ensure that overall journey times on busy routes that are predominantly used by through traffic remain unaffected. The Council is aware that other Highway Authorities have introduced 20mph limits in areas where the above criteria are unlikely to have been met and in the long run this may well bring those limits into disrepute.</p> <p>Drivers have to take responsibility for all aspects of motoring when they are in charge of a vehicle. It is accepted that adhering to a speed limit is one of these but this is no different than any other level of limit.</p> <p>The adopted Council policy on 20mph speed limits (in line with DfT guidance) only allows the introduction of 20mph speed limits on roads with mean speeds of 24mph or less. This is to avoid unnecessary additional enforcement by the Police</p>
24	I object to the above order.	Objection	See substantive comment – Extent of proposals

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	<p>While I support the proposed 20mph limit on all the roads stated, the Order is incomplete as it incomprehensibly misses out key roads in the town including roads used by children as routes to schools:</p> <ul style="list-style-type: none"> • Belcombe Road, • Newtown, • Masons Lane • Trowbridge Road • New Road • The lower section of Woolley Street <p>The Order should be amended to create equally safe conditions for all residents of the town.</p>	<p>but wants more</p>	
<p>25</p>	<p>I am very pleased that a reduced speed limit is being introduced in many parts of the town of Bradford on Avon. However, I am a little concerned that certain roads have been omitted, particularly Trowbridge Road. As the speed limit along the Frome Road is to be reduced to 20mph, it is almost inevitable that many drivers will instead travel along Trowbridge Road in order to avoid the speed restriction. Drivers already frequently travel at speeds above the 30mph limit, and I am concerned that this situation will be exacerbated with an increased traffic flow.</p> <p>Speed limits have been reduced around the local schools, but many children regularly walk along Trowbridge Road to reach Fitzmaurice Primary School, and also on their way to St Lawrence School. It would make sense to offer these children the same protection of a lowered speed limit.</p> <p>The speed limit will be reduced on many of the side-turnings off Trowbridge Road, including St Lawrence Road where I live. I think these reduced speed limits would be more likely to be observed if a similar restriction was also imposed on Trowbridge Road.</p>	<p>Support but wants more</p>	<p>See substantive comment – Extent of proposals</p>

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	Personally I would be happy to see a blanket 20mph speed limit throughout the town. The town centre is thriving, with many pedestrians, both local residents and also tourists, visiting shops, cafés and other facilities. A reduced speed limit would support and encourage this, and make the whole experience safer and more pleasurable.		
26	<p>What is the statistical evidence that 20mph signs affect accident rates? Can you provide figures for Bradford on Avon?</p> <p>Unless the streets selected are “policed” the signage will be useless.</p> <p>In addition, we should be aiming to reduce signage, not increase it- it is street scene litter.</p> <p>In view of the fact that there is no money or manpower to police existing traffic and parking regulations the only way to slow traffic down is by physical means eg humps or chicanes.</p> <p>In my area of town cars regularly race up Woolley Street at more than 30mph and every day cars exceed the 1 hour parking restrictions, often by several hours, occupying spaces intended for shoppers who support the businesses. In addition there is regular fraudulent use of blue badges.</p> <p>If these problems aren’t monitored– because of lack of manpower- then why are traffic orders that would need manpower to work being introduced?</p> <p>A solution that works independent of a person is required- humps or chicanes.</p>	Objection	<p>Department for Transport guidance states ‘<i>Research shows that on urban road with low average traffic speeds any 1mph reduction in average speed can reduce the collision frequency by around 6%</i>’</p> <p>The new 20mph limit will require additional repeaters throughout the length of the limit as well as the terminal signs. This is dictated by national legislation on the signing of speed limits. However the number of repeater signs will be kept to the minimum required and where possible existing street furniture will be used for mounting purposes.</p> <p>The use of physical measures is not part of the advertised proposals</p> <p>Targeted Parking Enforcement activities to target specific issues can be undertaken by the Council’s Parking Team. The Team can be contacted on parkingservices@wiltshire.gov.uk to report any issues.</p>
27	As residents of Huntingdon Rise, my wife and I support the proposed 20 mph speed limit. Ever since the bollards were removed from the junction of Ashley Road and Huntingdon Rise, our road has become a shortcut for drivers taking their children to and from St. Laurence School as well as other drivers. It is clear to us that many of the vehicles are travelling too fast. This has to be a safety consideration for young and old alike.	Support	<p>Comments of support are noted</p> <p>Parking across or opposite a driveway could be considered to be an obstruction offence for which the Police are the enforcement authority. Concerns should therefore be reported directly to them.</p>

<u>Ref</u>	<u>Comment Received</u>	<u>Comment type</u>	<u>Officer Comment</u>
	In addition, it would be a good idea if drivers could stop parking their cars opposite people's drives. The road is narrow enough and therefore it is difficult to reverse a car onto the road. Many of these drivers do not live in Huntingdon Rise. In fact, it is only recently that a car parked opposite our drive for six days was, I believe, an abandoned vehicle!		
28	<p>I'm surprised that Sladesbrook (B3109) is not included in the proposal for a 20mph speed limit and think it should be for the following reasons:</p> <ol style="list-style-type: none"> 1. There is an entrance to Christ Church CofE Primary School on this road which gets considerable use during school drop-off and collection times. 2. It is single-lane for a section of the road. Often drivers accelerate in this section or when they see a gap to avoid being delayed. <p>Has Sladesbrook been excluded from the proposal for a particular reason?</p>	Wants more	See substantive comment – Extent of proposals
29	<p>This would be a great development for the town.</p> <p>Whilst at times I know you can't do 20mph on some of these roads, there are other times when cars, vans and lorries do far in excess of the current 30mph limit. Given the narrowness of some of our pavements, this can make pedestrians feel really unsafe.</p> <p>However, it is disappointing that the Town Centre (especially the bridge), Moulton Drive, Trowbridge Rd, Winsley Rd and Bath Rd appear to be excluded. These are all heavily used by school children and elderly residents and their safety is being put at risk by not extending the 20mph zone to these roads.</p>	Support but wants more	See substantive comment – Extent of proposals

<u>Ref</u>	<u>Comment Received</u>	<u>Comment type</u>	<u>Officer Comment</u>
	<p>Moulton Drive in particular is a road where some drivers seem to ignore (or don't realise) the current limit - I was recently overtaken on this road when travelling at 30mph.</p> <p>Overall this is a much needed (and overdue) development that will really improve the safety of pedestrians and cyclists, but it also seems to be a missed opportunity - when we could be making the whole town a 20mph zone.</p>		
30	I am very surprised that the town bridge has not been proposed to have 20 mph limit. It is always a hazard for pedestrians, narrow pavements which often require somebody to step into the road.	Wants more	See substantive comment – Extent of proposals
31	I support the proposals as made but would prefer them extended to cover the whole of the Bradford 30mph area.	Support but wants more	See substantive comment – Extent of proposals
32	<p>Many thanks for your information leaflet about the proposed 20mph speed limit in Bradford on Avon.</p> <p>Personally, I feel that the speed limits are fine as they are, however I have no objection to the introduction of a reduced speed limit on housing estates.</p> <p>One proposal I do object to is the reduction to 20mph between the railway station and the Sainsbury's roundabout. Frome Road, Junction Road and St Margaret's Street are main routes to and from the town and is in constant use. I do not understand why they would receive different treatment to Trowbridge Road, Silver Street, New Road, Masons Lane etc. They are equal in traffic volume, residential housing and parking and I think that reducing the speed limit here would cause more problems than it solved.</p>	Support and objection	See substantive comment – Extent of proposals

<u>Ref</u>	<u>Comment Received</u>	<u>Comment type</u>	<u>Officer Comment</u>
33	<p>As a resident of Bradford on Avon, I fully support the proposal. My only concern is that Moulton Drive and the Southway Park area, where I reside, has not been included in these plans. Moulton Drive is currently 30mph with 50% of traffic exceeding this limit, particularly during the evening. I would like to understand why this area was excluded at this time.</p>	Support but wants more	<p>See substantive comment – Extent of proposals</p> <p>The adopted Council policy on 20mph speed limits (in line with DfT guidance) only allows the introduction of 20mph speed limits on roads with mean speeds of 24mph or less. This is to avoid unnecessary additional enforcement by the Police. Speeds on Moulton Drive are known to be well in excess of this and the area has previously seen the use of portable speed indicator devices to try to encourage motorists to comply with the posted 30mph limit.</p>
34	<p>I received with interest your flyer regarding proposed 20mph limits in Bradford on Avon. Whereas I heartily agree with any proposal to make our town more pleasant and safer, I query the ability to be able to effectively monitor and control these speed limits.</p> <p>My immediate issue concerns the mention in your flyer to the Town Council being aware of other issues on Trowbridge Road, Winsley Road, Bath Road and Ashley Road.</p> <p>I am particularly concerned with the mindless parking on the short slip road between Ashley Road and Huntingdon Rise by those picking up children from St Laurence School. This only occurs between approximately 2.30pm - 3.30pm.</p> <p>I urge the council to give priority attention to taking preventative measures. It simply requires double yellow lines each side of this slip road continuing around each side of Ashley Road and Huntingdon Rise. It already exists around each corner of Ashley Road. There is no need, and I have no wish for double yellow lines around any other part of Huntingdon Rise. Although temporary parking here at school times can be an inconvenience it causes no major problems or safety hazards.</p> <p>Please give this matter urgent attention before an accident occurs which is inevitable sooner or later.</p>	Comments	<p>Enforcement of all speed limits rests with the Police. The adopted Council policy on 20mph speed limits (in line with DfT guidance) only allows the introduction of 20mph speed limits on roads with mean speeds of 24mph or less. This is to avoid unnecessary additional enforcement by the Police</p> <p>These comments relate to parking issues and waiting restrictions in Ashley Road and Huntingdon Rise and therefore do not relate to the advertised proposal for 20mph speed limits.</p> <p>Proposals to control parking in Ashley Road and Huntingdon Rise are shortly to be brought forward by the Council and will be subject to their own formal consultation process.</p>

<u>Ref</u>	<u>Comment Received</u>	<u>Comment type</u>	<u>Officer Comment</u>
35	<p>What a complete waste of precious resources!! It is difficult to do over 20mph in any of the streets where the restrictions are proposed. How do you propose to police this? I suggest it is impossible.</p> <p>What we really need is for the whole of Bradford on Avon to be restricted to 20mph. Only then would we feel safer on our pavements.</p>	Objection	<p>Enforcement of all speed limits rests with the Police. The adopted Council policy on 20mph speed limits (in line with DfT guidance) only allows the introduction of 20mph speed limits on roads with mean speeds of 24mph or less. This is to avoid unnecessary additional enforcement by the Police</p> <p>See substantive comment – Extent of proposals</p>
36	<p>I don't agree with the implementation of a 20mph speed limit in Bradford on Avon. The current 30mph speed limit is not adhered to nor is it policed. Anyone spending time in Moulton Drive, Trowbridge Road and Frome Road can testify to that.</p> <p>Those irresponsible drivers ignoring the current speed limit will continue to ignore a reduced speed limit. There should be a more effective way to deter them.</p> <p>What are the statistics that show Jones Hill and Southleigh need a reduced speed limit. As a regular driver in that area I can assure you that it is almost impossible to go much faster than 20 mph anyway; the cost of additional signage is a total waste of money.</p>	Objection	<p>Enforcement of all speed limits rests with the Police. The adopted Council policy on 20mph speed limits (in line with DfT guidance) only allows the introduction of 20mph speed limits on roads with mean speeds of 24mph or less. This is to avoid unnecessary additional enforcement by the Police. Those lengths of road mentioned by the commenter that do not meet the criteria retain the current 30mph limit.</p> <p>See substantive comment – Extent of proposals</p>
37	<p>I wholeheartedly support the proposal to reduce the speed limit to 20mph in Bradford on Avon. Many people drive inappropriately fast around the areas where I live. I would be in favour of further speed reduction measures such as speed bumps. I'm sure the speed limit reduction will make the area safer for children and older people. I am a car driver and it does not concern me that journey times may be longer due to the changes. I only wonder why Trowbridge Road is not included in the 20 mph limit.</p>	Support but wants more	<p>See substantive comment – Extent of proposals</p>
38	<p>Further to the door drop recently received regarding</p>	Objection	

<u>Ref</u>	<u>Comment Received</u>	<u>Comment type</u>	<u>Officer Comment</u>
	<p>proposed 20 mph speed limits and why you are considering</p> <p>For clarity I oppose your proposal for the following reasons</p> <ul style="list-style-type: none"> a) If you want to make the streets safer then propose a bypass on the outskirts of Bath to join the A46 to the A36 and cut out the significant volume of traffic going south of BoA through our town b) Enforce the restriction on lorries coming through the town rather throwing your hands up saying it is too expensive c) If 20 mph should not be looked at in isolation then don't make a proposal in isolation. Why are you proposing controls in the least affect areas in the side streets north of Trowbridge Road when the danger road is Trowbridge Road d) When I see a proposal for traffic control in BoA as a complete plan rather than a "sticking plaster" approach then I will happily back speed limits as long as these proposal incorporate controls in the most needs areas e) Controls should be put in places of significant risk and you have failed to do this f) Controls need to be enforced and you have failed to do this historically 		<p>The majority of these comments relate to wider issues in Bradford on Avon and not specifically to the advertised proposal for 20mph speed limits. As such they cannot be answered as part of this proposal.</p> <p>See substantive comment – Extent of proposals</p>
39	<p>I have read the proposal about a 20mph speed limit in Bradford on Avon, or I should say certain roads in the Town.</p> <p>It is not that I do not agree with it, on the contrary the lower the speed limit the safer of course in theory, however a limit means nothing when people do not respect it, I for example live in St Laurence road with a 30mph limit and it would be absolutely fine if drivers respected the Limit, sadly a lot do not</p>	Supports but wants more	<p>See substantive comment – Extent of proposals</p> <p>Enforcement of all speed limits rests with the Police. The adopted Council policy on 20mph speed limits (in line with DfT guidance) only allows the introduction of 20mph speed limits on roads with mean speeds of 24mph or less. This is to avoid unnecessary additional enforcement by the Police</p>

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	<p>although they are fully aware that it is a family estate, some racers in the neighbourhood have families themselves but it does not seem to bother them.</p> <p>Likewise the delivery drivers, or some of them anyway, do not seem to be affected by any limit, any presence of pets, children etc...</p> <p>What I am trying to say is that we can put up as many signs with numbers but without a camera/monitoring system they are useless in my opinion, plus I cannot see how putting up more signs will solve the big problem with traffic in the town.</p> <p>Roads like Leigh Park road would benefit more from wide pavement with protective barrier than a lower speed limit sign, although as I said lower speed limit is welcome.</p> <p>The main thing with Bradford is that the traffic needs to flow, so minor roads stop being used as shortcuts from frustrated drivers and the only thing at present that would make the traffic flow is a one way system between Silver street and Masons lane, one way up one way down simply.</p> <p>That would leave plenty of space for things such as cycle lane and pavement whereas now its utter chaos and pedestrians, cyclists, motorcyclists are at risk at all times.</p> <p>Also, before it's too late, somebody better consider the five exit roundabout that is been built on the approach of the new housing estate next to the Moulton factory, it is simply dangerous the way its constructed plus the narrow bit on the Holt road side has remained....well narrow.</p>		<p>Suggestions for changes to the wider highway network in Bradford on Avon should in the first instance be raised with the Town Council.</p> <p>These comments will be copied to the Council's Highways Development Control team for consideration. This roundabout will be subject to an independent Road Safety Audit.</p>
40	I have received an information leaflet on proposed 20 mph speed limits which include Christchurch Road, Berryfield Road and Leigh Park Road.	Objection	

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	<p>I live on Leigh Park Road and therefore have first hand knowledge of traffic flow, usage, vehicle speeds etc. and I object to the speed limit being lowered from the perfectly satisfactory 30 mph limit in place at the moment.</p> <p>As you may be aware Leigh Park Road is a cul du sac, it therefore carries very limited traffic and only traffic going to or from residents, all of whom have a vested interest in maintaining sensible speeds. There is no need of interference from others wishing to impose their ideas of speed restriction.</p> <p>In any case Leigh Park Road does not fit your criteria for a lower 20 mph limit. Your information leaflet advises the criteria as follows "Wiltshire County Council is proposing 20 mph speed limits on the roads surrounding the towns schools, sports areas, tourist areas and roads used as shortcuts..."</p> <p>Let me point out the nearest school is the far end of Christchurch Road, there are no 'sports areas' or 'tourist areas' near, nor can it be a shortcut – its a no through road. It therefore doesn't fit your documented criteria and doesn't need a 20 mph limit.</p>		<p>Leigh Park Road is included in the proposals as it meets the criteria for a 20mph speed limit in terms of being a residential area with low traffic volumes and not subject to through traffic movements. It is also included for completeness as part of the overall road network in that area of the town. It would be inappropriate to leave Leigh Park Road as a 30mph limit when the only access to it is via Berryfield Road which is also to be subject to a 20mph limit.</p>
41	<p>I object to a number of aspects about the proposed 20mph limit.</p> <p>However, I am fully supportive of the proposed 20mph limit on all the residential roads shown on the maps, but it does not go far enough as it fails to include some important roads that are regularly used by school children on their way to school or where the roads are substandard.</p> <p>I would ask that the order is amended to include Winsley Road, parts of Bath Road, Ashley Road, Masons' Lane, Market Street, Newtown, Belcombe, New Road, parts of Woolley Street and Trowbridge</p>	<p>Objection and support but wants more</p>	<p>See substantive comment – Extent of proposals</p>

<u>Ref</u>	<u>Comment Received</u>	<u>Comment type</u>	<u>Officer Comment</u>
	<p>Road.</p> <p>Please note I live in Bearfield Buildings in one of the properties that regularly needs vehicle access onto Ashley Road and am frequently confronted by speeding vehicles as I turn out of Bearfield Buildings into Ashley Road.</p>		<p>Proposals to control parking in Ashley Road are shortly to be brought forward by the Council and will be subject to their own formal consultation process. These proposals may help when accessing Ashley Road from Bearfield Buildings.</p>
42	<p>In response to the TRO - Consultation on proposed - Various roads, Bradford on Avon - 20mph speed limit, I am writing to inform you that I very strongly support the proposed 20mph speed limit.</p> <p>As a resident of Mythern Meadow, Bradford on Avon I would like to see a 20mph speed limit on the proposed roads. I believe this will improve safety for my children age 7 and 9 who walk to school and the park through these streets. They would also love to cycle and scoot in the Mythern Meadow cul-de-sac but at present it is too dangerous as some vehicles frequently exceed even the 30mph limit. I believe the 20mph speed limit should be visibly enforced in order to deter drivers from exceeding the limit.</p> <p>I also strongly believe action is also required urgently to improve safety along the Trowbridge Road. There is a very serious problem with vehicles mounting the pavement where parked cars narrow the road and this is the same route used by families to get to school and nursery. I have also seen vehicles, especially mopeds, ignore the red light on the pelican crossing used by children to get to school.</p>	Support	<p>Comments of support are noted</p> <p>Concerns relating to Trowbridge Road have been raised and investigated previously by the Community Area Transport Group. However, there is no easy solution to the problem unless wholesale removal of on street parking can be achieved which is likely to be very unpopular. The Town Council is currently active in seeking to identify what alternative measures can be introduced and the commenter is therefore encouraged to engage with the Town council in the first instance if they wish to take this further.</p>
43	<p>We wish to register our opposition to the proposed traffic order on the following grounds:</p> <p>1. That the Local Authority has presented no auditable, documentary evidence that the proposed speed limit reduction complies with the principles</p>	Objection	<p>The proposals fully comply with the Council's adopted Policy on 20mph restrictions. The Policy is based upon Department for Transport guidance. Circular 01/06 was superseded by Circular 01/2013 which contained extensive revised guidance and a comprehensive change in stance on the use of 20mph</p>

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	<p>contained in current HM Government guidance ("Circular Roads 1/2006 - Setting Local Speed Limits"), namely that:</p> <p>a. The speed limit reduction is fully justified by irrefutable evidence that (to quote the HM Government guidance) the current limit poses "a particular risk to vulnerable road users". Specifically, the Local Authority has not presented any such evidence that confirms categorically and absolutely that any or all the following conditions have been met:</p> <p>i. On the roads that will be affected by the order, the number of serious injuries are above the statistical norm for these types of roads in areas with these types of population densities and types of traffic movements;</p> <p>ii. Threat levels on the roads that will be affected have all experienced a step change that warrants a decrease in the speed limit to the substantially reduced level proposed;</p> <p>iii. Future threat levels will be likely to experience a step change to a level that justifies the decrease in speed limit to that proposed for all roads affected by the order.</p> <p>b. Where 20 mph speed limits are introduced, the HM Government guidance states that these are unlikely to be self-enforcing (which suggests that a 20 mph limit is abnormally low) and hence require traffic calming measures to be installed. Introduction of such measures will be costly and cause unnecessary disruption during installation to residents and businesses. Furthermore, no evidence has been presented by the Local Authority of the cost of such measures and, specifically, whether they present good value to the Taxpayer. If chicanes are introduced then they will not only reduce speeds, but also impede free traffic flow, thereby increasing traffic fumes and noise to</p>		<p>restrictions</p> <p>See substantive comment – Extent of proposals</p>

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	<p>residents due to the inevitable stop/start nature of vehicles. They will also increase the potential for injury to vehicle occupants and damage to vehicles because they will result in road users being forced to compete for the same road space. The Local Authority may therefore find itself liable for any damage or injury that results from any system that is badly designed and implemented. Similarly, the Local Authority will be liable for damage to vehicles and property caused by speed cushions, should it decide to adopt this as a mechanism to enforce the reduced speed limits. Previous studies by respected motoring experts and organisations have shown that such devices cause damage to property structures, and to the tyres and suspension of vehicles. Where vehicles have been damaged by speed cushions this can go unnoticed. Such damage has resulted in road accidents causing death and serious injury to vehicle occupants due to often catastrophic failure of suspension components and tyres, sometimes months after the event and at high speed (when vehicle suspensions and tyres are under extended load). There is thus a disproportionate threat to the many vehicle users who would be affected by this order that are likely to outweigh the benefits of speed cushions;</p> <p>c. As the HM Government guidance states, a 20 mph speed limit is unlikely to result in a reduction in speed by road users (especially in quiet periods) unless there is widespread imposition of traffic calming, as noted in point b. above. In the absence of this there will be a requirement for widespread Police enforcement, given the likely widespread non-compliance to speed limits that are set at an abnormally low 20 mph. The Local Authority has presented no evidence that Wiltshire Police has both agreed to this speed limit reduction and is resourced to support the reduction of speed limits on all affected roads, at all hours, to the extent that will be necessary to ensure widespread and long term compliance;</p>		<p>The adopted Council policy on 20mph speed limits (in line with DfT guidance) only allows the introduction of 20mph speed limits on roads with mean speeds of 24mph or less. This is to avoid unnecessary additional enforcement by the Police.</p> <p>The proposals do not include the use of additional physical traffic calming measures such as additional chicanes or vertical deflections.</p> <p>The adopted Council policy on 20mph speed limits (in line with DfT guidance) only allows the introduction of 20mph speed limits on roads with mean speeds of 24mph or less. This is to avoid unnecessary additional enforcement by the Police.</p> <p>The Police have been consulted over the proposed change to the speed limit and have raised no objection.</p>

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	<p>d. Speed limits should not be used to solve the problem of isolated hazards such as poorly designed road junctions, or bends, as the HM Government guidance explains. In proposing this order, the Local Authority has presented no evidence that it has considered alternative, and potentially more effective measures, to solve any specific problems on all or any of the affected roads. The proposed order clearly indicates that the imposition of a blanket speed limit reduction is being taken rather than considered, proportionate and appropriate measures to 'engineer out' specific problems. This runs counter to the guidance;</p> <p>e. Speed limits should be determined by reference to the mean speed for each road, this being determined from "extensive research demonstrating the well proven relationship between speed and accident frequency and severity, and also reflect what the majority of drivers perceive as an appropriate speed to be driven for the road". Again, the Local Authority has presented no evidence that such "extensive research" has taken place, and that it irrefutable. This leaves the Local Authority open to Legal challenge, should the order be imposed as a blanket reduction on all the roads proposed. Most specifically, roads in the town that tend to be treated as 'through routes' are likely to be most impacted. This includes, but may not be limited to, Frome Road, Masons Lane and Bath Road. The Local Authority may have better Legal argument were this order to be limited to local, residential no-through roads. [It is worth noting that this 'mean speed' test replaced the '85th percentile' test contained in previous guidance which this current HM Government guidance superseded. Many experts argue that the former test was a more robust measure. Failure of the Local Authority to present evidence that it has not applied either of these tests would suggest the proposal to lower the speed limit would not withstand Legal argument];</p> <p>f. "What the road looks like to road users should be</p>		<p>This wording comes from paragraphs in the Guidance referring to the general principles of speed limits (para 40 Circular 01/13) and is one that the Council agrees with. However there are specific sections in the Guidance dealing with 20mph restrictions that the Council has based its Policy on. The proposals do not run counter to the Guidance as this principle relates to speed limits over short lengths or extensions over isolated lengths. The limits being proposed are area wide limits.</p> <p>See substantive comment – Extent of proposals</p> <p>Masons Lane and Bath Road are not included in the proposals.</p> <p>Whilst 'experts' might well express an opinion the Council adheres to the use of mean speeds as set out in the DfT Guidance.</p>

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	<p>a key factor when setting a speed limit". This point reinforces point e. above in that roads which are normal, busy 'through routes', and have been such for many decades, are not likely to suddenly attract a different driver behaviour simply because the Local Authority may wish to impose a reduced limit, at least not without a radical revision to the road layout of the type that Bradford-on-Avon Town Council proposed for Masons Lane and which was rejected by Taxpayers in a local Referendum. Should the Local Authority ignore this "key factor" it could again be subject to Legal argument against the proposed scheme, resulting in such scheme needing to be abandoned where one that has more limited affects (as noted in point e. above) may result in no challenge;</p> <p>g. The Local Authority are instructed, by the HM Guidance, to ensure "that the benefits exceed the disbenefits before introducing or changing a local speed limit". The guidance notes that this is to include journey times for motorised traffic, environmental impact, the cost of any engineering measures, and the cost of enforcement. The Local Authority has not provided evidence that the benefits clearly outweigh the disbenefits. The previous points refer to most of these aspects, specifically the environmental and cost considerations. However, we also note with concern the lack of impartial expert analysis on these subjects. We have significant and specific concern that the proposal is so extensive that it will very substantially and adversely affect the traffic flows through the town. This is already so finely balanced that a minor blockage already results in 'gridlock' at peak periods. Changes so radical could adversely impact the viability of local businesses, damage tourism and inward investment, substantially increase journey times (especially at peak periods) and cause (rather than prevent) accidents as drivers become frustrated and increasingly desperate to overcome lost time when transiting the town. There are likely to be increased (rather than reduced)</p>		<p>Wiltshire Council's Policy on 20mph speed limit restricts their use to those areas where considerable numbers of vulnerable users are present and actual driven speeds are already low. This is to ensure that overall journey times on busy routes that are predominantly used by through traffic remain unaffected.</p> <p>Wiltshire Council's Policy on 20mph speed limit restricts their use to those areas where considerable numbers of vulnerable users are present and actual driven speeds are already low. This is to ensure that overall journey times on busy routes that are predominantly used by through traffic remain unaffected.</p> <p>It appears that this commenter believes that the proposed limit covers the whole of Bradford on Avon. This is not the case.</p> <p>The majority of through routes are to remain at 30mph and as such journey times will be unaffected.</p>

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	<p>queues on all routes through the town due to these measures. As residents local to Frome Road who also need to transit the town each day for business and personal needs, we will be directly and adversely affected by increased traffic emissions (caused by standing and stop/start traffic very close to our hone, and having to sit in this traffic ourselves for longer periods, thus encountering increased pollution over extended time), and increased journey times at busy times (caused by congestion) and quiet times (due to a legal speed limit almost half its current level);</p> <p>h. No evidence has been presented that these measures satisfy the principle of the HM Government guidance that "The underlying aim should be to achieve a 'safe' distribution of speeds which reflects the functions of the road and the impacts on the local community". This principle reinforces the previous points noted above and confirms the fact that, without evidence that is impartial and suitably robust, that the proposal can be subject to Legal challenge;</p> <p>i. Because the HM Guidance states that "Alternative speed management options should always be considered before a new speed limit is introduced" we would have expected the Local Authority to present unequivocal evidence that confirms the imposition of this 20 mph limit now presents the only viable option to managing traffic through the town. Such evidence is not available and so the Local Authority would appear to have no just Legal cause to impose said reduced limit, across the number of routes stated in the proposed order, until and unless such evidence is available for public scrutiny;</p> <p>2. As longstanding residents of the town who have lived here for nearly 23 years, we can count on our extensive experience of using the majority of the roads to be affected by this order, in particular the main routes such as Frome Road, Masons Lane and Bath road. We have done so as drivers, cyclists</p>		<p>See substantive comment – Extent of proposals</p> <p>This comes from the superseded guidance. The commenter should refer to the revised guidance on 20mph restrictions contained in Circular 01/13</p> <p>Masons Lane and Bath Road are not included in the proposals.</p>

<u>Ref</u>	<u>Comment Received</u>	<u>Comment type</u>	<u>Officer Comment</u>
	<p>and pedestrians, both as adults and with our children. In our humble opinion, there is no just reason to impose this reduced speed limit on the majority of the roads stated in the proposed order, specifically those considered 'through routes' (including the roads named here). We therefore refute the need for a blanket and total speed restriction, at all hours, on all the roads in the proposed order. In short, this is not needed and not wanted. As such, we request that the Local Authority reconsiders the proposed order, with a view to retaining the existing speed limit on all but those roads that are residential only and which do not form part of the existing 'through route'.</p>		
44	<p>I should like to draw your attention to the anomaly that Barton Close, has not been included in the order for the new 20 mph limit.</p> <p>Barton Close should be included in the order, for the following reasons:</p> <ol style="list-style-type: none"> 1. It is a small cul-de-sac off a part of the Frome Road covered by the order. 2 The road is unsuitable for traffic moving at faster than walking pace. 3. There is no dedicated footway in the Close. It is in effect shared space. 4. It constitutes a pedestrian way to the west-bound platform of the BoA Railway Station. 5. It constitutes the only route available for disabled access to the west-bound platform. 6. It appears to be the only residential road along the restricted length of Frome Road not included in the order 7. It would be silly to change to a 30 mph limit for the Close. 8. Signage for a 30 mph for the Close would be required and this would be expensive. 	Objection	Barton Close is not adopted Highway and the Council is therefore not able to introduce a speed limit upon it.