

## APPENDIX D

### 20mph Speed Limit Programme

#### Key findings and officer responses to objections received.

Through this consultation people were asked to provide their comments on the proposals, including any objections, and reasons for objection for each of the proposed areas and locations contained within Phases 3 and 4. The consultation was conducted between 24 July 2024 to 25 September 2024. The approach used was a direct letter drop to approximately 26,000 residents and businesses directly affected by the proposals and an online public consultation through the 'Have your say' consultation portal at [www.haveyoursay.wirral.gov.uk](http://www.haveyoursay.wirral.gov.uk) with a page dedicated to the 20mph speed limit Consultation. Documents provided on the site included background to the scheme, a link to the original Committee decision to progress with the scheme and, a link to a map showing each proposed area boundary. An online questionnaire was provided for residents to engage with. Respondents were also able to submit additional comments via a dedicated email address, which was published on the 'Have your say' website as well as on all public notices. There was also the opportunity for visitors within the webpage to sign up to become a Champion of the scheme. This could include volunteering for the Safer Roads Watch Scheme or simply by displaying campaign posters / stickers in their cars, homes, wheelie bins etc.

The consultation questionnaire was developed to enable stakeholders to record their support or objection to each, or all, proposed schemes, and provide additional text comments as to the reasons for their support or objection. No questions were mandatory so respondents could choose which questions to respond to.

Following closure of the consultation, the responses to each of the questions were collated and combined with the email and call centre submissions. The questionnaire was responded to by 1,078 people providing a total of 1,782 responses, with an additional 231 direct comments received via the dedicated email and postal address supplied for the consultation process and via the Council's Contact Centre. Overall, there are 192 written representations in support and 1,790 against, 10 requesting extensions and 21 were misinformed and objected to the bypasses being included within the proposal, which they are not. The online survey results are summarised for each area in Appendix B to this report. In terms of the results, it is important to note that the public consultation is not representative of the overall population but provides information on the opinion only of those residents who engaged. All of the direct responses were made in relation to the general overall scheme rather than for specific areas, so they have not been included within the graphics in Appendix B as they do not relate directly to the Phase 3 and 4 schemes, however, each point raised in those emails has been addressed below in the key objection themes.

The statutory consultation phase of the 20mph speed limits allows members of the public to object to the scheme proposals as well as provide comments and/or support. There have been several examples, where residents and ward members have asked officers to extend the 20mph speed limit based on their local knowledge, such as West Kirby Road near to the Saughall Pub and the B5136 in Bebington, near to the Rose and Crown Pub. Officers have also been asked to review the extents of the current 20mph speed limits on certain roads, for example Leasowe Road and Pensby Road and officers are currently reviewing those requests.

Officers have also received several suggestions for extensions to the existing scheme in Thornton Hough, Gills Lane / Barnston Road, Spital Road near to the station and through Frankby Village. These locations will also be assessed and considered.

**Summary:****Area 5 – bounded by Corporation Road / Wallasey Bridge Road / Dock Road**

No of Support	No of Objections	Total Responses	Approximate Resident Population
3	67	70	718

**Area 6 – bounded by Dock Road / Gorse Lane / Poulton Road/**

No of Support	No of Objections	Total Responses	Approximate No of Properties
4	53	57	999

**Area 13 – bounded by Woodchurch Road / Borough Road / Oxton Road / Whetstone Lane**

No of Support	No of Objections	Total Responses	Approximate No of Properties
10	82	92	3,068

**Area 17 – bounded by Rock Ferry Bypass / New Chester Road / New Ferry Road**

No of Support	No of Objections	Total Responses	Approximate No of Properties
4	124	128	1,201

**Area 18 – bounded by Esplanade / Rock Ferry Bypass / New Ferry Bypass**

No of Support	No of Objections	Total Responses	Approximate No of Properties
2	41	43	1,162

**Area 19 – bounded by Mount Road / Bracken Lane / Teehey Lane / Broadway**

No of Support	No of Objections	Total Responses	Approximate No of Properties
10	60	70	1,617

**Area 24 – bounded by Brimstige Road / Spital Road / M53 / Brotherton Park**

No of Support	No of Objections	Total Responses	Approximate No of Properties
12	148	160	1,878

**Area 26 – bounded by Thornton Hough – Neston Road / Raby Road**

No of Support	No of Objections	Total Responses	Approximate No of Properties
15	51	66	27

**Area 27 – bounded by Neston Road / Grange Road**

No of Support	No of Objections	Total Responses	Approximate No of Properties
2	24	26	472

**Area 29a – bounded by Woodchurch Road / Arrow Park Road / Upton Bypass**

No of Support	No of Objections	Total Responses	Approximate No of Properties
10	164	174	4,096

**Area 32 – bounded by Fender Lane / Hoylake Road / M53 / Bidston Village Road**

No of Support	No of Objections	Total Responses	Approximate No of Properties
0	18	18	268

**Area 37 – bounded by Saughall Massie Road / West Kirby Road / Pump Lane / Greasby Rd**

No of Support	No of Objections	Total Responses	Approximate No of Properties
6	73	79	2,524

**Area 38 – bounded by Pump Lane / Frankby Road**

No of Support	No of Objections	Total Responses	Approximate No of Properties
5	41	46	341

**Area 39 – bounded by Greasby Road / Frankby Road**

No of Support	No of Objections	Total Responses	Approximate No of Properties
8	64	72	155

**Area 40 – bounded by Greasby Road / Upton Bypass / Arrow Park Road**

No of Support	No of Objections	Total Responses	Approximate No of Properties
4	65	69	1,293

**Area 41 – bounded by Hill Bark Road / Arrow Brook Lane / Arrow Road**

No of Support	No of Objections	Total Responses	Approximate No of Properties
13	71	84	1,470

**Area 42 – bounded by Landican Lane / Barnston Road / Storeton Lane**

No of Support	No of Objections	Total Responses	Approximate No of Properties
4	55	59	359

**Area 43 – bounded by Barnston Road / Pensby Road**

No of Support	No of Objections	Total Responses	Approximate No of Properties
10	77	87	201

**Area 45 – bounded by Brimstage Road / Whitehouse Lane / Barnston Road**

No of Support	No of Objections	Total Responses	Approximate No of Properties
7	49	56	563

**Area 46 – bounded by Brimstage Road / Manor Wood / Chester High Road**

No of Support	No of Objections	Total Responses	Approximate No of Properties
3	35	38	452

**Area 48 – bounded by Thurstaston Road / Thingwall Road / Common / Limbo Lane**

No of Support	No of Objections	Total Responses	Approximate No of Properties
9	42	51	1,784

**Area 51 – bounded by Upton Bypass / Moreton Road / Arrowe Park Road**

No of Support	No of Objections	Total Responses	Approximate No of Properties
7	127	134	1,283

**Totals – all 20mph areas within Phase 3 & 4**

Total No of Support	Total No of Objections	Total No of Responses	Total Approximate No of Properties
<b>148 (0.6%)</b>	<b>1,531 (5.9%)</b>	<b>1,679 (6.5%)</b>	<b>25,931</b>

**School area – Bidston Village Road (Full Length)**

No of Support	No of Objections	Total Responses
3	5	8

**School area – Breck Road (Between its junctions with Fox Hey Road and Breck Place)**

No of Support	No of Objections	Total Responses
0	5	5

**School area – Column Road (Between its junctions with Burlingham Av and Boundary Rd)**

No of Support	No of Objections	Total Responses
4	8	12

**School area – Heath Road (From its junction with St Edmunds Road and a point 180m north west of its junction with Norbury Avenue)**

No of Support	No of Objections	Total Responses
2	4	6

**School area – Irby Road (Between its junctions with Somerset Road and Kylemore Drive)**

No of Support	No of Objections	Total Responses
1	12	13

**School area – Meols Drive (Between its most northerly junction with Graham Road)**

No of Support	No of Objections	Total Responses
1	17	18

**School area – Moreton Road (Between its junctions with Ford Road and Doncaster Drive)**

No of Support	No of Objections	Total Responses
1	6	7

**School area – Park Rd South (Between its junctions with Palm Grove and Francis Avenue)**

No of Support	No of Objections	Total Responses
0	4	4

**School area – Seabank Road (Between its junctions with Dalmorton Rd and Dalton Road)**

No of Support	No of Objections	Total Responses
2	14	16

**School area – Talbot Road (Between its junctions with Holm Lane and Mill Hill)**

No of Support	No of Objections	Total Responses
2	5	7

**School area – Upton Road (Between its junctions with Dawpool Drive and Rosslyn Drive)**

No of Support	No of Objections	Total Responses
3	4	7

**Totals – 20mph (total 11 school areas within Phases 3 & 4)**

<b>Total No of Support</b>	<b>Total No of Objections</b>	<b>Total No of Responses</b>
<b>19 (18%)</b>	<b>84 (82%)</b>	<b>103</b>

**Key Support Themes**

The points raised about the proposal by supporters are as follows:

- Will make roads safer.
- Will make roads safer to cross for vulnerable people.
- That it will change driver behaviour and attitude for the better
- Most cyclists are also drivers and are happy to slow down when driving, for pedestrians and cyclists to feel safer.
- That it could become an accepted aspect of road safety, like seatbelts.
- Will make roads quieter.
- Will benefit public health.
- Could decrease air pollution.
- Could decrease congestion.
- Will improve journey times.
- Should reduce fuel costs and support healthier choices.
- Will encourage walking and cycling.
- Will make areas more pleasant for work and travel.
- Might encourage people to dwell in retail areas if they are on foot / bicycle.
- Represents value for money as casualties fall and active travel rises.
- Most side roads in Wirral pre-date the car and are therefore inappropriate for vehicles. Lower speeds might encourage more cycling and walking to combat this.
- Could lead to increase in child and elderly mobility.
- Improve quality of life and health for residents

**Key objection themes and officers' response:**

<b>No</b>	<b>Question/Comment</b>	<b>Officer Response</b>
<b>1</b>	Agree that there is merit in introducing lower speed limits on side roads and residential roads but that it is inappropriate to introduce 20mph on busy thoroughfares and main roads.	In addition to introducing 20mph speed limits on residential roads, we are also proposing 20mph limits on A & B roads as well as main distributor roads where there are residential properties fronting onto them or defined suburban district centres, local amenities, schools in the area that will generate a level of footfall. The introduction of 20mph speed limits is just one element of the measures to reduce vehicle speeds. Reducing the speed limit should not be seen as an end in itself, but as part of a continuous process to encourage a change in driver behaviour and attitude.
<b>2</b>	That it will increase journey times and congestion.	On a clear stretch or road, travelling at 20mph will obviously take longer than travelling at a higher speed. However, research indicates that at slower speeds, vehicles flow more smoothly through junctions. As such, within an urban environment, 20mph may help to improve traffic flow.

		20mph will predominately apply on residential streets, and in selected locations on main roads. Most main roads will keep their existing 30mph or 40mph speed limits, so once drivers leave residential areas that are 20mph and join the main road network there should be no impact on journey times. The parts of any journey affected would only be the short sections of that journey that would be on 20mph roads to reach the main road network.
3	That it will create poorer air and noise quality due to congestion and traffic levels.	Driving at 20mph has been found to reduce traffic noise; the benefit of a signs-only scheme is that drivers can adopt a smoother driving style than if they were driving through a traffic calmed zone with humps. Studies have so far not conclusively proven either a positive or negative effect on the environment. The greatest environmental benefit from the change will come from unlocking the potential for walking or cycling short distances instead of driving. Guidance from the Department for Transport states that adopting a smoother driving style can also achieve lower emissions and that driving more slowly at a steady pace saves fuel and carbon dioxide emissions, unless an unnecessarily low gear is used. Along shorter roads with junctions and roundabouts, limiting acceleration up to 20mph also reduces fuel consumption. In addition, with technological advances in the motor industry it is likely that there will be more hybrid and electric vehicles on the borough's roads in the future.
4	Feel that enforcement will be an issue and that the police should be directing their resources elsewhere.	20mph speed limits are enforceable as like any other change in speed limit and are signed in the same way as other speed limits and drivers are expected to observe them as any limit or traffic sign should be. Signs and lines would be installed to make drivers aware of the 20mph limit. 20mph would be the legal limit on the roads affected and should persistently speeding at certain locations become an issue, further measures would be considered to address this. Classified roads are a throughfare for the distribution of traffic through major towns or cities. Where possible, Merseyside Police already conduct speed enforcement on these roads. It should also be noted that offenders who are identified and are eligible can be offered a National Speed Awareness Course for excess speed in a 20mph limit.
5	Feel that the proposal will affect businesses as visitors will not want to come if they are at risk of being prosecuted or having a driving record tarnished with a speeding conviction.	The lower speed limits are likely to encourage more footfall from pedestrians or cyclists, which may improve passing trade for some businesses in areas where vehicles dominate and are often just using the route as a thoroughfare, rather than stopping to make use of the amenities.
6	Some suggest that collisions will increase as drivers will become frustrated at the slow-moving traffic and will also lack concentration as they will constantly be monitoring their vehicle's speed so as not to be prosecuted.	Lower speeds will lead to a smoother flow of traffic meaning less stop and start and more opportunity to maintain a safe distance between the vehicle in front. Motorists currently must monitor their speed on any road or highway so as not to contravene the imposed speed limit, so there will be no difference in behaviour caused by the proposal.
7	Funds should be spent elsewhere such as	It was agreed by the Environment, Climate Emergency & Transport Committee on 14 March 2023 to allocate funding

	enforcing parking restrictions, tackling cyclists and scooters using footways, maintaining existing infrastructure or introducing segregated cycle routes.	as part of the City Region Sustainable Transport Settlement Combined Authority Transport Plan towards Phase 2 of this project. This funding is not via the Wirral Council purse and can only be used for the 20mph speed limit scheme, as that is what it was allocated for. It cannot be used elsewhere.
8	The money should be invested in public transport instead.	The funding for this scheme cannot be used to improve public transport. Merseyside has an independent body, Merseytravel, who looks after public transport within the region and it is therefore, not under the control of any of the Merseyside local authorities.
9	Suggest that this may be a revenue generating scheme for the Council.	Speed enforcement is conducted by the Police, in association with the local authorities. The revenue from any fines goes to central Government funds, and to fund speed awareness courses. None of the money from fines comes back to local authorities.
10	That more traffic signals should be introduced to slow down traffic.	Traffic signals are introduced at junctions where the careful management of traffic flow is needed to keep the wider network moving and to give the opportunity for traffic on all arterial routes, not just the dominant routes, to be able to move in and out of an area. Before traffic signals are introduced, the junctions are modelled using current traffic count data to evaluate what traffic queues would be like on each approach to a potential signalised junction, particularly at peak times of the day. It is inevitable that traffic signals will cause traffic queues and therefore, they are only introduced when necessary. It would be inappropriate to introduce traffic signals for the sole purpose of stopping traffic and therefore slowing it down.
11	Can see little point in introducing a 20mph on their residential estate as vehicles are already being driven at less than 20mph.	Introducing 20mph speed limits on all suitable residential roads provides consistency for motorists and other road users. It would be confusing and difficult to enforce the speed limit in certain areas if isolated residential roads are left out of the scheme when all other surrounding residential roads are to be subject to 20mph. Having "20" terminal signs on the access to smaller side roads or having repeater signs on those narrow roads with parking congestion reminds road users that the area is a residential or commercial area with potentially heavy pedestrian and cyclist numbers, and this should encourage careful travel along the roads.
12	Suggest that some roads should be reduced to 10mph instead if the elimination of collisions is the aim.	Local authorities are bound by Regulations set by central Government (Department for Transport) and are only permitted to introduce signs on the highway that are prescribed by those Regulations. As there is no prescribed signage available for a 10mph speed limit, any such speed limit would be legally un-enforceable, and the Council is unable to introduce it.
13	Feel that the current speed limits are sensible and that the proposal to reduce them lacks logic and evidence.	The objective of the scheme is not just about introducing 20mph speed limits, it is also about providing much better access to cycling and walking and creating quiet neighbourhoods with lower traffic levels. Local authorities have previously planned transport schemes with vehicle use as a main consideration and this may have encouraged people to use cars. However, the priority now should be to make the road network more attractive for walking and cycling and safer for all road users.
14	That it will not improve road safety.	The primary objective of delivering 20mph speed limits on suitable roads is to improve highway safety for all road



		users through reduced vehicle speed, less road traffic collisions and encourage more people to active travel through increased walking and cycling.
15	Feel that motorists are being penalised.	20mph creates a safer environment for everyone, including motorists. It will not significantly increase journey times and, by easing traffic flow, may reduce some journey times. The Council is trying to balance the needs of drivers with the safety and environment of local residents. This will be a change and it will take some conscious decision making as a driver to make a difference.
16	That this will hinder deliveries and emergency services.	As stated previously, it is anticipated that there will be minor impact on journey times and congestion. The main radial routes around the borough will remain at their current speed limits for the most part and therefore, the scheme proposals may encourage less "rat running" through residential areas and district centres. In terms of emergency service vehicles, they are exempt from speed limits when on an emergency call.
17	That this will increase fuel costs.	As a result of reduced acceleration and braking and limiting acceleration up to 20mph, this may help to reduce fuel consumption. In general, driving more slowly at a steady pace saves fuel.
18	Traffic will be displaced to other areas.	Traffic may be displaced to the higher speed main road network around the borough, which are largely to remain at their current speed limit. These roads are more equipped to deal with higher levels of traffic (limited traffic signals etc). This may also reduce the amount of "rat running" through busy suburban district centres or village centres.
19	Will cause damage to cars through wear and tear by driving at lower speeds.	Modern cars can drive at 20mph without damaging their engine or components. 20mph limits have been used for many years and there have been no reported gearbox issues. In fact, using the right gear and driving at a consistent speed will help prolong engine life.
20	The consultation letters arrived late as they were dated 24 July 2024	<p>The letters delivered were dated the 24 July 2024 as that was the start date of the consultation for the first areas proposed for this latest phase, however, in hindsight, the letter should have probably been left undated, as this appeared to cause some confusion with some residents believing that they had received the consultation very late when in fact, the consultation was carried out on a rolling basis over 8 weeks with different start and end dates, depending on which area the resident lived in. Some residents also seemed to presume that the consultation for their area had closed without checking the online map and information which they were directed to via the letter, to see which area their residence was located in.</p> <p>The letter was issued as a prompt to residents to provide feedback in case they had not seen the public notices or heard about the scheme through social media or in the local news. Therefore, this was issued in addition to what is the statutory part of the process.</p>
21	Speeds will increase as people will deliberately ignore the lower speed limits as they are against the scheme.	Once the speed limits are in place, they will be enforceable by Merseyside Police. Those motorists captured in contravention of the speed limit during enforcement activities will be subject to the same penalties as those captured in contravention of other higher speed limits on all classified roads and motorways. Enforcement activities will often be focussed on locations where the speed limit is exceeded regularly.

22	The existing 30mph speed limits should just be enforced instead.	The static speed enforcement cameras within the borough are to stay at their current locations as the areas where they are located are to remain at their current speed limits. The mobile camera enforcement sites are currently under review as there might be some impact on existing locations, due to the change in speed limit on some roads. The police will review and confirm those locations with officers in due course. It is proposed that the 20mph limits will be enforced in the same way as the existing 30mph limits in the borough, and therefore, police resource allocation is unlikely to change. The growing numbers of volunteers for the Safer Roads Watch initiative (close to 100 volunteers) identifies the benefits that when communities opt to collaborate with the Council and Police to improve safety. We have received interest from local people wanting to become Champions for 20mph via the Have Your Say Page.
23	The police have not got the resources to enforce the lower speed limits.	Officers from our Road Safety Team are in regular contact with the Merseyside Police roads policing team and are liaising on the rollout of the 20mph speed limit areas and future enforcement and public engagement activities. This is all part of the vision zero campaign. Safe Speeds is a key component of the Liverpool City Region Road Safety Strategy, which was adopted in November 2022, all partners have signed up to this strategy including Merseyside Fire and Rescue, Merseyside Police, Police and Crime Commissioner and Local Councils. Locally, in Wirral there is a communications plan in place involving key partners, which will target schools and businesses etc as well as a media campaign.
24	Driving in a lower gear at higher revs causes more pollution.	Studies have shown that introducing 20mph speed limits does not increase pollution or fuel use. The way a vehicle is driven has more effect on air pollution than a 20mph speed limit. Those drivers who accelerate and brake sharply create more emissions than those who drive smoothly and at a steady speed, whatever that speed is. It is not so much the choice of gear but the driver's awareness of the road conditions, selecting the correct speed, ability to recognise hazards and plan ahead. Many drivers may need time to adapt to the new limits but over time, we should see calmer road environments, reduced road casualties and more people encouraged to travel more actively, including children walking and cycling to and from schools.
25	The 20mph speed limits should only be introduced on a part time basis at peak times and around schools.	Introducing the lower speed limit aims to provide benefits for all road users, not just vulnerable school children. Also, children only spend a small amount of their time at school, and we would like to introduce measures that will protect them at other times also, within the places that they live, socialise, and play etc.
26	The last government instigated a review of speed limit schemes so why is this going ahead?	There has been no direction from the DfT regarding the progression of speed limit schemes in England or Wales. The borough-wide 20mph speed limit scheme is not classed as a low traffic scheme as its aim is not to remove traffic, just to slow it down. It should also be noted that the current Transport Secretary within the new Government in England has explicitly stated that "Local authorities will have my full support to roll out schemes" in relation to 20mph speed limits.
27	The scheme will cause intimidation and harassment	Inconsiderate driving behaviour is very intimidating and exactly the type of behaviour that this scheme intends to

	by other motorists who do not want to stick to the speed limit, and frustration could cause collisions.	alleviate so that pedestrians, cyclists, and all other road users feel safer travelling on the highways, particularly in residential and district centre areas. The more motorists that adhere to the slower speed limits, the more accepted the lower speed limits will be to the general motoring public.
28	Cyclists can travel at more than 20mph without restrictions.	<p>Currently, the speed limits imposed on highways apply only to motor vehicles. Local authorities do have the powers to impose speed restrictions on cyclists, but this is usually introduced in places like promenades etc. The government has recently stated their intention to conduct a review and amendment of existing laws on road safety which could see cyclists legally required to travel at the same speed as drivers in 20mph limits. The 20mph speed limit schemes in the Wirral are being proposed in part to assist and encourage cyclists by providing a safer road environment and therefore, we would hope that cyclists would respect those aspirations and not travel at excessive speeds in residential and built-up areas.</p> <p>Although speeding is not usually an offence, cyclists who ride dangerously (risking causing injury to another person or severe damage to property) are committing an offence under section 28 of the Road Traffic Act 1988 and could be fined. Careless cycling (when a cyclist uses the road without due care and attention or consideration for other road users) is also an offence under section 29 of the Road Traffic Act 1988 and can also attract a fine. This is currently enforced by the police.</p>
29	Fines and points on licence leads to higher insurance.	It is the responsibility of all motorists to stay within legal posted speed limits to be complying with the law. Any associated fine or points resulting from a contravention of any speed limit, not just 20mph is likely to result in higher insurance premiums but that would depend on the prosecution given and the motorists driving/offence history.
30	What about electric bikes and scooters, how will they be regulated?	<p>Electrically Assisted Pedal Cycles (EAPCs) are subject to certain restrictions, to be road legal they must have a motor with a maximum power output of 250 watts which should not be able to propel the bike faster than 15.5mph. An electric bike that does not meet the EAPC rules (<a href="https://www.gov.uk/electric-bike-rules">https://www.gov.uk/electric-bike-rules</a>) is classed as a motorcycle or moped and will be subject to comply with the highway code. Trials of rental e-scooters are taking place in a number of locations and e-scooters can only be used in the approved areas, the nearest scheme is Liverpool City Centre. Privately owned e-scooters cannot be used on the road or in public spaces.</p> <p>Pedal Cycles are not classed as a motorised vehicle and therefore the law does not apply for speeding, however in certain circumstances a rider could fall under the offence of 'careless cycling' or 'dangerous cycling.'</p>
31	The scheme will increase bus journey times.	Most bus services travel along roads that will stay at their current speed limit. It is only at the ends of some routes, where the buses go onto residential roads or where they travel along busy district centres, where the speed limit may be 20mph. Most buses spend little time travelling at more than 20mph, particularly in residential areas, due to the

		frequency of stops and the need to carefully negotiate obstacles such as parked cars. Even on main bus routes a recent study found that less than 25% of the time was spent above 30kmph (18.5mph) (Passenger Transport Executive Group – Bus Idling and Emissions). At peak times, this proportion is even less.
32	Collisions caused by bad driving standards; education would be better.	A combination of mobile enforcement vehicles and fixed cameras will be used to make roads safer for all users. Community Speed Watch groups, the Council road safety team, and the local policing teams, will also continue to seek opportunities to provide education for drivers, particularly those who are exceeding the speed limit.
33	Cars are no longer able to cruise in higher gears.	If radial routes are used wherever possible, where speed limits are to be retained, rather than cutting through residential and district centre areas, then motorists will be able to travel at higher speeds for most of their journey.
34	The process is flawed.	The scheme proposals have been advertised and progressed in accordance with The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. As directed by the regulations, all representations will be considered by the Environment, Climate Emergency and Transport Committee who will decide on how to progress.
35	Leading cause of road traffic collisions is drivers under the influence of alcohol and / or drugs.	The three leading causes of road traffic collisions in England are motorists failing to look properly, failing to judge other persons path or speed, and driving recklessly or with excessive speed. Road traffic collisions are also the worldwide leading cause of death for children and young adults between the ages of 5 and 29 years.
36	The vigilante approach of residents having handheld speed cameras will not foster good relations and could cause violence and assaults and a threat to public safety	Those who volunteer to join the Safer Road Watch schemes are given full training and are fully backed by Merseyside Police. Any threats or acts of violence towards those volunteers, will be reported to the police and treated like any other threat of violence within the wider community.
37	The blanket approach to the 20mph speed limits is too much	A blanket approach has not been taken to the implementation of 20mph speed limits within Wirral. Many of the borough's roads are to remain at their current speed limit. Only those roads or parts of roads that are residential or where pedestrians, cyclists and other vulnerable road users are likely to mix with motorists are being considered.
38	Should retain 30mph on main routes and enforce via average speed camera	The funds are not available to introduce this type of strict enforcement on all roads within the borough.
39	Wales has now reversed its 20mph policy and will be reverting all speed limits back at great cost	The Welsh Government has set aside a small amount of funding to review some strategic and rural routes "on roads outside city, town or village centres where pedestrians and cyclists do not frequently mix with motor vehicles," with the potential to revert back to the original speed limits. However, individual local authorities will have to apply for the limited funding to revert particular locations and therefore, it is likely that the vast majority of the 20mph speed limits in Wales will be retained
40	Modern vehicles are safer than ever, with advanced safety features, so there is	Not all vehicles using the roads are fitted with those safety features. The advanced safety features on modern vehicles no doubt does help to reduce collisions, however their full

	no need to lower speed limits	effect is still reliant on sensible driving capabilities and on the proviso that the driver does not become reliant on, overconfident or willing to take more risks because of those features.
41	Motorists will avoid the 20mph speed limits and use 30mph plus speed limit roads and they will become congested	If more motorists decided to use higher speed roads for their commute, then those roads are more suited to that type of traffic, and it will take more traffic away from potential conflict with pedestrians, cyclists, and other road users.
42	The number of collisions shown on the yellow signs throughout the boroughs main routes is false and Wirral has a very low collision rate	The existing yellow backed signs installed across the borough that show the numbers of road traffic collisions are currently out of date. Officers will undertake a review of these signs to determine whether they are to be updated or removed entirely as part of a sign de-cluttering exercise. It is important to highlight that the proposal to introduce 20mph speed limits in Wirral supports the Liverpool City Region Road Safety Strategy vision to reduce road traffic collisions to zero by 2040.
43	Virtually all collisions are caused by tiredness, inattention and inexperience and have nothing to do with speed	According to the Royal Society for the Prevention of Accidents (RoSPA), speeding remains the leading cause of all road traffic collisions. The proposal to introduce 20mph speed limits in Wirral supports the Liverpool City Region Road Safety Strategy vision to reduce road traffic collisions to zero by 2040.
44	Making criminals out of responsible competent drivers	Those motorists captured in contravention of the posted speed limit during enforcement activities will be subject to the same penalties as those captured in contravention of other higher speed limits on all classified roads and motorways.
45	30mph speed limits have been in place in residential areas since the start of motoring law, so why do we need 20mph now?	The 30mph default limit in built-up areas has been in place for approximately 90 years and was introduced when there was approximately 10% of today's vehicles on the road. Vehicle ownership and use has significantly increased since then along with the speed capabilities of vehicles and therefore, this speed limit cannot now be considered appropriate in all circumstances. DfT figures show that for every 1mph reduction in speed, collisions reduce by 6%.
46	This is an ableist attack on those requiring the use of vehicular transport	The speed limit scheme is not proposing to prevent or restrict the use of vehicular transport by anybody, it is just proposed to limit the speed at which those vehicles travel on certain roads within the borough.
47	Pedestrians and other cars emerge in front of those driving in the 20mph speed limits as they feel they have the time to do so, and this can be dangerous	Slower traffic speeds will allow for a safer environment for all road users.
48	This will create rat running through residential areas	Those areas will also be subject to 20mph speed limits, so there will, be little benefit from leaving an arterial route that might only have a short section of 20mph imposed, before transitioning to a higher speed limit, meaning that motorists can legally travel faster towards their destination.