

APPENDIX E - KEY FINDINGS AND OFFICER RESPONSES TO OBJECTIONS

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 zones contained within Phase 1. The consultation was carried out between 5 October and 30 November 2022. The approach used was an online public consultation through the 'Have your say' consultation portal at www.haveyoursay.wirral.gov.uk with a page dedicated to the 20mph speed limit consultation. Documents provided on the site included a background to the scheme, a link to the original committee decision to progress with the scheme and maps of each proposed zone. One 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 alongside the online tool.

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 submissions. The questionnaire was responded to by 919 people, with an additional 49 direct representations received via the dedicated email address supplied for the consultation process. These are summarised for each zone in Appendix C 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.

Summary:

- **Zone 2 – Area bounded by Wallasey Village Road / Martins Lane / Seabank Road / Coastal Drive - Scheme reference number TO/22/16**
 - Out of the total responses, 54 supported the scheme and 116 objected to it.
 - The approximate resident population in this zone is 28,000.

- **Zone 4 - Area bounded by Breck Road / Docks Link / Wallasey Village / Bayswater Road - Scheme reference number TO/22/27**
 - Out of the total responses, 5 supported the scheme and 24 objected to it.
 - The approximate resident population in this zone is 10,000.

- **Zone 7 - Area bounded by Gorsey Lane / Dock Road / Poulton Road / Birkenhead Road - Scheme reference number TO/22/28**
 - Out of the total responses, 6 supported the scheme and 21 objected to it.
 - The approximate resident population in this zone is 10,000.

- **Zone 9 - Area bounded by Conway Street / Canning Street / Chester Street / Park Road North - Scheme reference number TO/22/21**
 - Out of the total responses, 8 supported the scheme and 31 objected to it.
 - The approximate resident population in this zone is 9,300.
- **Zone 12 - Area bounded by Claughton Road / Upton Road / Bidston Road / Storeton Road - Scheme reference number TO/22/24**
 - Out of the total responses, 31 supported the scheme and 34 objected to it.
 - The approximate resident population in this zone is 14,000.
- **Zone 14 - Area bounded by Borough Road / New Chester Road / Bedford Avenue / Kings Lane - Scheme reference number TO/22/20**
 - Out of the total responses, 12 supported the scheme and 38 objected to it.
 - The approximate resident population in this zone is 13,500.
- **Zone 16 - Area bounded by Bedford Avenue / Bebington Road / Old Chester Road / New Chester Road - Scheme reference number TO/22/25**
 - Out of the total responses, 15 supported the scheme and 17 objected to it.
 - The approximate resident population in this zone is 9,300.
- **Zone 22 - Area bounded by New Chester Road / Bebington Road / Spital Road / Croft Avenue East - Scheme reference number TO/22/18**
 - Out of the total responses, 76 supported the scheme and 119 objected to it.
 - The approximate resident population in this zone is 6,300.
- **Zone 23 - Area bounded by New Chester Road / M53 / Hooton Park / New Ferry Road - Scheme reference number TO/22/22**
 - Out of the total responses, 9 supported the scheme and 43 objected to it.
 - The approximate resident population in this zone is 11,300.
- **Zone 25 - Area bounded by Poulton Hall Road / M53 / Hooton Park / River / New Ferry By-pass - Scheme reference number TO/22/23**
 - Out of the total responses, 3 supported the scheme and 22 objected to it.
 - The approximate resident population in this zone is 27,000.
- **Zone 28 - Area bounded by Woodchurch Road / M53 / Prenton Golf Course / Lever Causeway - Scheme reference number TO/22/29**
 - Out of the total responses, 11 supported the scheme and 18 objected to it.
 - The approximate resident population in this zone is 9,700.
- **Zone 29 - Area bounded by Storeton Road / Talbot Road / Bidston Road / Upton Road / M53 - Scheme reference number TO/22/26**

- Out of the total responses, 15 supported the scheme and 25 objected to it.
- The approximate resident population in this zone is 14,200.
- **Zone 33 - Area bounded by Fender Lane / Hoylake Road / M53 / Leasowe Road / Pasture Road - Scheme reference number TO/22/30**
 - Out of the total responses, 9 supported the scheme and 48 objected to it.
 - The approximate resident population in this zone is 10,100.
- **Zone 47 - Area bounded by Telegraph Road / River Dee / Oldfield Road - Scheme reference number TO/22/31**
 - Out of the total responses, 21 supported the scheme and 18 objected to it.
 - The approximate resident population in this zone is 6,600.
- **Zone 49 - Area bounded by Telegraph Road / River Dee / Golf Course - Scheme reference number TO/22/19**
 - Out of the total responses, 35 supported the scheme and 62 objected to it.
 - The approximate resident population in this zone is 12,500.

Key Support Themes

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

- Will make roads safer
- That it will change driver behaviour and attitude for the better
- That it could become an accepted aspect of road safety, like seatbelts
- Will make roads quieter
- 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:

1. 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.

Response: The proposed 20mph speed limits are only proposed 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 etc 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.

2. That it will increase journey times and congestion

Response: On a clear stretch of 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 mainly 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 20mph speed limits and join the main road network there should be no impact on journey times. The parts of any journey affected would only be the relatively short sections of that journey that would be on 20mph roads in order to reach the main road network.

3. That it will create poorer air and noise quality due to congestion and traffic levels.

Response: 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 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 generally 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.

Response: It is proposed that the 20mph limit would be enforced in the same way as the existing 30mph limits in the borough. 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 persistent speeding at certain locations become an issue, further measures would be considered in order to address this. Classified roads by definition 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 now be offered a National Speed Awareness Course for excess speed in a 20-mph 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.

Response: The lower speed limits might 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.

Response: 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 have to 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. Feel that this is a waste of money and Wirral Council funds should be spent elsewhere such as enforcing parking restrictions, tackling cyclists and scooters using footways, maintaining existing infrastructure or introducing segregated cycle routes.

Response: It was agreed by the Environment, Climate Emergency & Transport Committee on 1st March 2022 to allocate funding as part of the City Region Sustainable Transport Settlement Combined Authority Transport Plan towards 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
Response: 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
Response: 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
Response: Traffic signals are introduced at junctions where the careful management of traffic flow is needed in order 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 absolutely 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.
Response: 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. However, over time it will become accepted such as other road safety campaigns like the wearing of seatbelts and anti-drink driving.
12. Suggest that some roads should be reduced to 25mph, rather than 20mph.
Response: 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 25mph speed limit, any such speed limit would be legally un-enforceable and the council is unable to introduce it.
13. Suggest that a reduction from 40mph to 30mph is more effective

Response: Most residential and main distributor roads are currently subject to a 30mph speed limit by default. There are very few roads in the borough, subject to 40mph, where residential properties are located. Therefore, there would be little impact to residential areas or those containing public amenities, if 40mph speed limits were reduced to 30mph.

14. Suggest that a 20mph is not appropriate for the M53

Response: The M53 Motorway is not included within the proposals. It is under the control of National Highways and Wirral Council have no jurisdiction over it. The M53 is on the boundary of some zones so may have been mentioned within the consultation, however, there is no intention to reduce the current speed limit on the motorway.

15. Concerned that the scheme may introduce wider non-compliance from some motorists regarding other road regulations

Response: It will take some time for 20mph to become second nature. In reality, motorists rarely drive at a consistent speed, particularly in built up urban areas where drivers are constantly accelerating, decelerating and braking to respond to current traffic speeds, traffic lights or junctions. Over time it will hopefully become accepted such as other road safety campaigns like the wearing of seatbelts and anti-drink driving.

16. Feel that the current speed limits are sensible and that the proposal to reduce them lacks logic and evidence.

Response: 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.

17. That it will not improve road safety

Response: Same response as No 16

18. Feel that motorists are being penalised

Response: 20mph creates a safer environment for everyone, including motorists. It will not significantly increase journey times and, by easing traffic flow, may actually 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.

19. That this will hinder deliveries and emergency services

Response: As stated previously, it is anticipated that there will be little 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.

20. That this will increase fuel costs

Response: 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.

21. Traffic will be displaced to other areas

Response: 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.

22. Will cause damage to cars through wear and tear by driving at lower speeds

Response: Modern cars can drive at 20mph without damaging the 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.

23. Concerns about excessive street furniture

Response: Once the scheme is complete, the signage will be sufficient as required by the Department for Transport for a legally enforceable scheme and for the new speed limit to be clear to drivers.

24. The council should prioritise its statutory duties

Response: Section 130 of the Highways Act 1980 states that it is a duty for the Highway Authority to assert and protect the rights of the public to use and enjoy the Highway. Introducing a lower speed limit in order to promote alternative healthier modes of transport, will assist in achieving this duty.

25. The proposal was not sufficiently advertised

Response: Due to the nature of the scheme and the zones encompassing large residential and business areas, it was agreed with Legal Services that the most effective consultation would be via publication of press releases, social media alerts, public notices and Wirral Council's engagement tool 'Have Your Say' website which satisfied the consultation requirements listed under Section 7 of The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996.

There have been numerous press releases and social media posts directing the public to the council's dedicated "Have your say" webpage for this scheme, which gives background details, maps and other information along with the opportunity to take a survey and leave feedback. Public notices were also placed throughout the areas within phase 1 of the scheme with details of the proposal and information on how to provide feedback. The advertisement of public notices in the local newspaper publications and on-site form part the statutory legal part of the process. The 1996 regulations also direct a minimum 21-day statutory consultation period for TRO schemes such as this, however, the council extended this to 28 days for these particular schemes, to allow extra time for feedback.

26. Would rather have specific shared streets open to active travel

Response: 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. The priority now should be to make the whole road network more attractive for walking and cycling and safer for all road users.

Recommendations:

Appendices A and B to this report set out officers' specific recommendations for those locations where it is recommended that 20mph speed limits are introduced, as part of phase 1 of this scheme.