

## **Chichester 20 MPH Speed limits on residential roads** **Consultation Results**

### **How the Results Were Compiled**

All of the responses to the consultation were recorded by the WSCC Office Services Team, who entered the results into spreadsheets. These spreadsheets were then sent to a legal officer in the Traffic Regulation Orders Team for analysis.

Firstly the spreadsheets were combined and checked for duplications. During the consultation some respondents had submitted several separate responses. The data was therefore analysed to ensure that as far as possible duplicate entries were removed and each person only generated one response in the final figures.

Checking for duplications was only possible if submissions included adequate name and address data, as requested on the response forms. A number of responses were made anonymously or with so little detail that it was impossible to check them against the rest of the data for duplications. Unfortunately the only way to ensure fairness and minimise the risk of the final consultation result being affected by duplicated responses was to remove anonymous responses from the final figures.

All comments submitted with responses were included in spreadsheets passed to the legal officer compiling the final figures. These were all reviewed and it became clear that most comments fell into common categories. These are reported in the figures below.

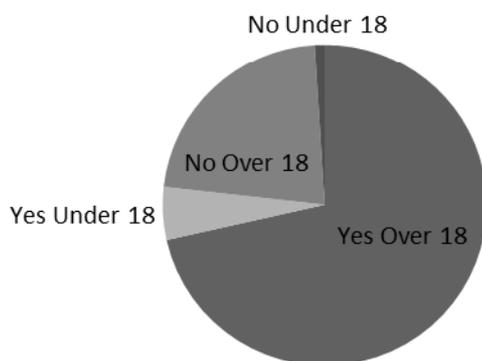
### **Age of Respondents**

All response forms used as part of the consultation asked the respondent to confirm whether or not they are under the age of 18. Responses from people under voting age were welcome but it was felt that it might be useful to report on this factor as part of the consultation results.

When the responses were being analysed it was observed that some parents were making submissions on behalf of very young children. The ages of children were sometimes included in responses and in some cases it was being claimed that children as young as 10 months old supported or objected to the scheme. While these responses were no doubt well meaning, this situation creates a disparity in the figures because parents submitting a response on behalf of a very young child are in effect submitting more than one response to the consultation.

It is not possible to speculate how many "Under 18" responses were actually submitted by parents in duplication of their own consultation response. The figures below therefore report the Under 18 responses separately. It is believed that the Under 18 figures reflect the general view of young people to the scheme but Members are asked to note that the figures for this age group are considered less reliable than those of the Over 18 group.

## Overall Result Summary



Yes, Supports Scheme (Over 18 yrs old)	4012
Yes, Supports Scheme (Under 18 yrs old)	298
No, Does not support scheme (Over 18 yrs old)	1247
No, Does not support scheme (under 18 yrs old)	56
<b>TOTAL RESPONSES (after removal of duplicates and un-verifiable submissions)</b>	<b>5613</b>

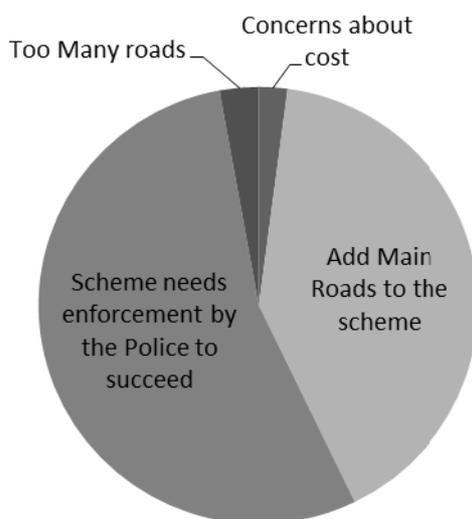
### Responses by Area

The majority of roads covered by the proposed 20 mph speed limits fall within the PO19 postcode area. The following table shows how many of the above consultation responses were submitted by people living within the PO19 area. It should be noted that many people living outside the PO19 area work in Chichester or frequently visit the city.

Area	Yes (over 18)	No (over 18)
PO19	3776	1204
Other	236	43

Area	Yes (Under 18)	No (Under 18)
PO19	279	51
Other	19	5

## Yes Votes - Most Frequent Comments (Respondents Over 18)



Scheme Needs Police enforcement to Succeed	208
Main Roads should be added to scheme	156
Too Many roads in proposal	11
Concerns about cost of scheme	8
General comments or no comments (not included in above diagram)	3629
<b>TOTAL</b>	<b>4012</b>

The above figures represent the points most frequently raised in correspondence. In addition to the above points many people submitted general comments of support for the aims of the scheme and raised concerns that traffic speeds on the roads of Chichester are presently too high.

## No Votes - Most Frequent Comments (Respondents Over 18)



Waste of Money, or Scheme Unnecessary	289
Too Many roads in Scheme	120
Enforcement and Compliance issues	76
Will Not Improve Safety	67
Congestion and Traffic Delays	54
General comments or no comments (not included in above diagram)	641
<b>TOTAL</b>	<b>1247</b>

The above figures represent the points most frequently raised in correspondence. People objecting to the number of roads in the scheme generally indicated that they would not object to 20 mph speed limits around schools or at school times. General objections often referred to 20 mph as being too slow or raised concerns about pollution from vehicles being driven in a lower gear.

The statutory process required to make a Traffic Regulation Order was combined with the wider public consultation on the scheme. This approach was taken to allow the CLC to consider the results of the consultation and make a decision on whether to implement a formal Traffic Regulation Order at the same meeting.

The Traffic Regulation Order Team received several responses during the consultation period and these have been included in the figures in the proceeding sections.

In addition, Members are asked to review the following correspondence:

- Letter from Sussex Police
- Message Supporting the scheme from Sarah Sharp the 20s Plenty for Chichester campaign organiser
- Formal objections from the Richmond Park Residents Association, A Chichester City Council Member and Stagecoach Buses
- Formal objections from 2 residents of Chichester submitted as part of the formal Traffic Regulation Order process.



**ROAD POLICING UNIT  
OPERATIONS DEPARTMENT  
POLICE HEADQUARTERS**

Your Ref: CHS-8001-MM

Our Ref: TMW/144/12/IWJ

Date: 17<sup>th</sup> September 2012

Extension: [REDACTED]

Dear Mr Moore,

**West Sussex County Council (Chichester: Various Roads) (20mph Speed Limits) Order  
2012 - Statutory Consultation**

I refer to your letter of formal consultation, dated the 31<sup>st</sup> August 2012, in respect of the above matter and confirm that in principle Sussex Police has no objections to the proposal as outlined.

It is important to emphasise the point that Sussex Police supports the Department for Transport's position that such speed limits should, in the main, be self enforcing and that in the present financial climate the police service is not in a position to divert resources away from core policing to conduct additional enforcement activity to generate compliance with the lower speed limit.

Therefore, we are encouraged that where the lower speed limit is introduced on roads that are at this time, outside of the speed limit policy criteria, the Authority will monitor to identify whether traffic calming measures are needed or the road is removed from the scheme.

On that basis, we do not consider there to be any issues under the Crime and Disorder Act.

Yours sincerely,

Ian Jeffrey  
Traffic Management Officer (West)  
Road Policing Unit  
Operations Department

Mr M Moore,  
Legal Officer, Joint TRO Team,  
Ground Floor,  
Northleigh,  
County Hall,  
Chichester,  
West Sussex,  
PO19 1QT



<mark.hodgson@westsuss  
ex.gov.uk>

12/09/2012 23:22

To <martin.moore@westsussex.gov.uk>

cc

bcc

Subject Form completed for CHS8001MM - Chichester: 20MPH  
Speed Limits

Form	CHS8001MM - Chichester: 20MPH Speed Limits
Response ID	57
Time	12/09/2012 23:22

## RESPONSE FORM

### Comments:

I support this proposal and detail my reasons below.

There are 8 million people in the UK with 20 mph as the default speed on their residential roads, including people in Portsmouth, Oxford, York, Bristol, Islington and the counties of Lancashire and Bath and North East Somerset. There are many communities in Europe where the default speed is also 30 kph.

Quite simply other communities have been able to set slower speeds, why can't we here in West Sussex? I believe it will make for safer, friendlier streets.

43% of West Sussex residents WSCC interviewed in its Household survey say that the roads are too dangerous for them to consider walking or cycling. Many people consider our roads as death traps for cyclists. Even the Leader of WSCC, Louise Goldsmith, said in the Chichester South CLC Meeting last November that she did not cycle on Chichester's roads due to reasons of "personal survival".

All communities aspire to safer, more pleasant, people-friendly streets and only the 20's Plenty for Chichester Community Group has had the courage to put this on the agenda. The car lobby is obviously all powerful in the home of the Festival of Speed!

It is however absolutely wrong that the decision as to what speed we should have on our streets is determined by the success or otherwise of the public consultation. We need our Traffic Authority to take responsibility for the safety of vulnerable road users. Their safety should not be subject to the whim of public popularity, or how many people I can encourage to vote in the next few days. We have met people in Chichester who have voted against this proposal because they do not have any children - but they admit they might have voted differently if they had children, alternatively we have met road-racing cyclists who have voted against as they feel safe on the roads. Have any of these people considered the needs of more vulnerable groups of people, eg children and elderly people needing to cross busy roads? Who is there to think of the needs of the more vulnerable if our Traffic Engineers cannot do this for us, without a Community Group having to nudge them all the way.

We need to have a system whereby a community does not have to have a "Sarah Sharp" campaigning for them in order to get safer streets.

The Streets in Chichester City Centre need to have reminder signs up as people do not register the gateway signs and if visiting Chichester they do not get a reminder of the speed limit when leaving the car park after a day's shopping.

I feel the public consultation documents did not make it clear to the people of Chichester the reasons for such a change in speed limit - although the Statement of Reasons published for the TRO did - but this was not sent to every household in Chichester as the FAQ was. A change to 20 mph needs to be explained to the public.

I am concerned the list of roads in the 2 lists provided by WSCC for the Public Consultation and TRO and the map are not the same. I obviously support the proposal as I asked for this 2 1/2 years ago, but find the path to safer roads has been strewn with difficulties, changes of rules, and misunderstandings. It is still not clear how the proposal will proceed over the coming weeks as noone has told us how the consultation will be analysed. It is unclear which roads are in and which will still be in in November as the rules keep on changing on every turn.

My reasons for supporting this proposal are my daughter and my son who cycle to school every day on Chichester's streets. I too risk my life every single day. By extension, I believe that every child and adult has a right to get around our City in safety, especially if they choose not to have a metal box around them for protection. Roads are for people not just for cars to get from a to b. 20's Plenty where People live.

First Name: Sarah  
Last Name: Sharp  
Middle Name: Mary  
Title: Mrs

[REDACTED]

Telephone Number:

Mobile Phone Number

Email Address

[REDACTED]



Richmond Park Residents  
Association  
<richmondparkresidentsass  
ociation@hotmail.co.uk>

17/08/2012 18:16

To <chichester20mph@westsussex.gov.uk>

cc

bcc

Subject 20mph Richmond Park Residents Association

## 20mph Chichester Consultation

**The Richmond Park Residents Association**, representing more than 100 households in the Palmers Field Avenue, Kidd Road, Peacock Close, Mansergh Road and Carse Road, area objects to the present plan because of the exclusion of Kingsmead Avenue and Lower Barnfield Drive from the zoning.

Planning consent exists and construction work is well advanced for the Graylingwell site and this includes more than 100 houses and flats with more than 10 entrance driveways onto Kingsmead Avenue.

A site for a primary school has been earmarked and the county council is proposing to utilise the land for a new 200-250 place school.

Kingsmead Avenue is the main entrance for 500 of the 800 properties at Graylingwell, the Number 55 bus is to be rerouted along Kingsmead Avenue.

The University of Chichester and Chichester District Council have policies to create the main University entrance off the Western end of Kingsmead Avenue and additional health service land is to be developed for 250-400 dwellings, again accessed from Kingsmead Avenue.

Lower Barnfield Drive will continue to be used as a commuter "rat-run" and will soon have a new major supermarket on the Homebase site and will see all open lane fronting Barnfield Drive used for retail and business park developments.

The cost of introducing a new 20mph zone, just for Kingsmead Avenue, at a later stage will be an unnecessary expenditure and any speed related injury accidents on these non-20mph roads would certainly attract scrutiny of the planning process which allowed these two residential roads to be exempt.

Within two years the roads will become a very busy and potentially hazardous route.

If the overall scheme is amended to include Kingsmead Avenue and Lower Barnfield Drive then the RPRA would support the overall 20mph zoning for Chichester.

Tony Tavinor,  
Chairman Richmond Park Residents Association

\*\* Please note we tried to complete the online comments but it was rejected as "form already submitted" although none was ever tried before.

**Formal Objection to the West Sussex County Council proposal to introduce 20 mph speed limits on the roads in Chichester as named in your schedule papers dated 30 August 2012**

Dear Sir,

I object to the above proposals on behalf of my constituents as one of the elected City Councillors for the North Ward of Chichester. I appreciate that there may be some who support the proposals but to date *all* comments made to me have opposed the proposals. There are three main objections.

**1 Safety**

The large majority of *roads listed in your schedule* have a nil accident rate over the last 5 years. On the rare occasion where they do occur most are listed as 'slight'.

Evidence from several towns and cities in England show that where 20 mph is introduced the accident rate increases. There are a variety of reasons for this and I hope you have followed the debate between the 20's Plenty campaign and Mr Eric Bridgstock, an independent road safety researcher, which I will not replicate here. Suffice it to say that due to the very small accident rate in the *streets you list*, from evidence in other comparable towns it is a reasonable assumption that *accidents will increase* in those Chichester streets if 20 mph is introduced.

**2. Enforcement**

Your comment on Enforcement in paragraph 6 of your notes on Frequently Asked Questions is *unrealistic*. After 3 years of 20 mph limits in Oxford the police have only last month for the first time, managed an attempt to enforce the limit. Even then they only warned people travelling at 26 mph or more and did not fine anyone until their speed reached 32 mph or above. (Source Oxford Times 9 August 2012 and BBC Radio Oxford). I think it unlikely that our police will have enforcement of 20 mph in the designated Chichester streets at the top of their agenda. Rightly, they will be anxious to spend their limited time in preventing real crime and stopping real criminals.

Interestingly, my wife and I were staying in Oxford during the enforcement week and we saw no evidence of police carrying out their duties. However, we did experience the confusion for a visitor trying to negotiate the proliferation of road signs and road markings; buses undertaking at great speed in designated lanes and then joining the main stream with little care for safety; pedestrians and cyclists wandering over the road with no thought for their own safety or others, etc. We are not surprised the accident rate has increased significantly in Oxford since the introduction of 20 mph.

**3. Pollution**

Your comments on the Environment in paragraph 1 of Frequently Asked Questions is again contrary to the facts. The environment will NOT be improved with vehicles travelling at 20 mph. In fact the exact opposite will occur. It is well known that *pollution is increased* when lower gears are used and there are few vehicles that will be able to travel in any gear higher than 2nd to keep the limit. As a result the health of pedestrians and cyclists in particular, will be significantly impaired by the increase in noxious fumes.

I trust West Sussex County Council will *reject this proposal* and use the money saved on more important issues such as redesigning roads to remove poor sight lines which lead to serious accidents.

[Redacted] City Councillor for the North Ward  
11th September 2012



Twinned With



Chartres



Ravenna

CHICHESTER CITY COUNCIL

[Redacted]  
COUNCILLOR

THE COUNCIL HOUSE  
NORTH STREET  
CHICHESTER

WEST SUSSEX PO19 1LQ  
[Redacted]



Adam Keen

05/09/2012 14:52

To <martin.moore@westsussex.gov.uk>

cc

bcc

Subject Formal consultation - 20MPH speed limits

History

📧 This message has been replied to.

Dear Martin

I write further to the email that was sent out by WSCC on the 3rd September 2012 which details a formal consultation about the introduction of 20MPH limits in residential streets.

The list of streets in question is vast and certainly affects most - if not all - of our City services.

Given that Chichester has an unusually low number of bus priorities and is unlikely to see any future priorities of any consequence, I have to consider the obvious effect on timekeeping that any such traffic orders will create.

Please be assured that where safety is concerned, Stagecoach take a proactive and pragmatic approach. We are a large International organisation with an excellent safety reputation and the number of incidents that we are involved in within Chichester is testament to our commitment to operating buses in a safe and orderly way. Indeed, we often deploy staff members with speed cameras to go and carry out random checks. Only this week, an Inspector was in a residential area undertaking covert speed checks. He recorded no buses speeding.

Nonetheless, I would object most strongly to the introduction of 20MPH limits on many of the roads that you have highlighted for consultation. Before I came to work in West Sussex, I worked in a large City within the UK and various 20MPH limits were introduced. The effect on bus reliability was considerable and negative. I should imagine that the average speed of traffic along many of these roads is far less than 30MPH currently. However, it seems fairly obvious that if you lower the speed limit, you also lower the average speed of traffic.

Fuel prices have risen whilst bus service operators grants have lowered. Drivers costs have risen whilst many revenue sources have not followed suit. In light of these unfortunate situations, simply throwing more time into a bus schedule is no longer an option and our focus is firmly on running what we have reliably within the current restraints.

For public bus services to be truly desirable, they have to run frequently, swiftly and be able to transport passengers to their destinations with minimal delays. I recently spent some time working for Stagecoach in London and their services are an example of this. Their buses run swiftly along prioritised routes and through 30MPH limits. Consequently, the bus is an attractive option and is becoming increasingly popular with passengers of all age ranges.

We have no such priorities in Chichester so the focus must remain on retaining sound reliability on the current schedules. 20MPH limits will not assist this and in fact may endanger it.

That said, I am not totally against 20MPH limits on all roads - We just need to ensure that the selection of roads chosen are appropriate.

Yours

Adam Keen  
Operations Manager  
Stagecoach South

The Bus Station  
Southgate  
Chichester  
West Sussex  
PO19 8DG



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COPY

[REDACTED]  
Chichester,  
West Sussex, [REDACTED]

Telephone [REDACTED]  
e-mail [REDACTED]

TRO Team  
Northleigh  
County Hall  
Chichester  
West Sussex, PO19 1QT

10 September 2012

Dear Sirs

### **Chichester 20mph Consultation**

I hereby object to the proposals for the introduction of 20 mph speed limits on all residential roads in Chichester as canvassed in your circular dated August 2012.

The bases for my objection may be summarised as follows:

- The proposed widespread application of 20 mph is not in accordance with Department of Transport advice
- The proposals will increase air pollution on residential roads
- The proposals will not be enforceable by the Police unless promoted as discrete 20 mph speed limits for every individual street
- The proposals will have spurious benefits and have potential implications for accidents on residential and main roads
- The suggestion that repeater markings on the road will minimise cost and street clutter is misleading as it would be unlawful
- The implementation of the proposals will lead to adverse environmental intrusion by virtue of the necessary attendant signing, even more so if they have to be supported by traffic calming measures
- The cost of implementation of the overall proposals will far exceed £70,000 if they are to be lawfully signed and enforceable

Also, having regard to the foregoing points and the corresponding misleading information included with the circular, it would appear that this consultation is flawed and therefore invalid.

I shall expand briefly on each of my objections in turn in the following paragraphs.

#### Inappropriate Application of 20 mph Limit Across Chichester

Department of Transport (DoT) advice for the installation of individual 20 mph limits is that the limit should be used where excessive speeds occur and where traffic calming measures would otherwise be needed to ensure speeds are at or below 20 mph. 20 mph zones are considered to be especially appropriate where there is an existing record of accidents to children occurring over an area or where the concentrations of pedestrians and/or cyclists exist or are anticipated.

The widespread application of 20 mph limits as proposed is clearly not consistent with the DoT's advice.

#### Increased Air Pollution

Modern cars and other vehicles are designed to run most efficiently at a given speed and, if the vehicle is driven at a different speed, the result is increased pollution. Generally it is accepted that the most efficient speed for a car is 40 mph, with lesser speeds being less efficient and 20 mph being significantly less efficient with a consequent increase in air pollution. The proposals are therefore likely to have adverse effects on air quality in Chichester's residential areas.

#### Unenforceable Proposals

The Police typically do not attach any priority to the enforcement of 20 mph. The expectation is that such limits should be self-enforcing and that where such limits are introduced simply to respond to a local desire then, because there is no specific threat and risk to safety, the Police will apply their resources to other priorities. This was indeed underscored in the evidence presented by the Association of Chief Police Officers (ACPO) to the Transport Committee of the House of Commons on 7 February 2012.

#### Impact of Proposals

Whilst it is indeed statistically correct that pedestrians are less likely to be killed when hit by a car travelling at 20 mph than by one at 30 mph, that cannot provide the requisite local justification for the proposed scheme. Indeed, the proposals will inevitably encourage more traffic onto the orange roads shown on the plan included with your circular with an implicit resultant increase in higher severity accidents. Moreover, the widespread introduction of unenforced 20 mph limits on Chichester's residential roads could lead to a misplaced confidence in road safety by pedestrians and a growing abuse of those limits by drivers, together serving to increase the occurrence of accidents over time. By way of illustration Portsmouth recorded a 6 per cent increase in accidents, including more schoolchild casualties, following the implementation of its £500,000 20 mph zone two years ago. Finally it is pertinent that the Transport Research Laboratory (TRL) has recently concluded that using 20 mph speed limit signs without supporting traffic calming measures has led to reductions in "before" speeds of only 1 mph on average.

#### Repeater Road Markings

The 20 mph limit will require roadside repeater signs at regular intervals as prescribed by law; the only exceptions to this are where they are self-enforcing through the use of traffic calming measures. Repeater markings on the road are not a lawful substitute for repeater signs. This is underlined in paragraph 14.30 of Chapter 3 of the Traffic Signs Manual 2008 where it is very clear that, unless supported by a comprehensive system of traffic calming, repeater signs are required if the limit is to be enforceable, and none can be omitted as that would serve to invalidate the entire scheme. Indeed, the DoT indicates that 20 mph roundels used as repeater signs would only be appropriate where a speed limit was to be enforced by signs alone, *as the roundel marking must be accompanied by a vertical repeater sign*. Although not presented as part of the proposals, the necessary traffic calming measures (road humps, road narrowings etc) to give effect to the scheme, are both expensive and unpopular with drivers, bus passengers and many residents. The latter are a requirement of 20 mph zones which are not enforceable by law.

#### Adverse Environmental Intrusion

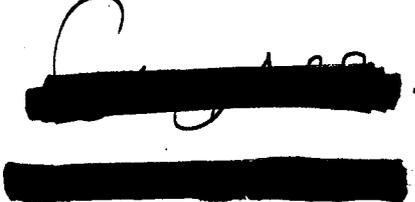
As the paper attached to the consultation letter indicates the signs required for the scheme including repeater signs would introduce street clutter. This is acknowledged in the paper to be present even in the situation as proposed where road markings are intended to be used unlawfully to avoid the installation of repeater signs.

Cost of Proposals

The cost of the proposals is presented as being some £70,000. Unfortunately this does not reflect the cost of a full, lawful signing scheme to give effect to the necessary traffic orders. Nor does it reflect the enforcement costs that would be incurred by the Police. The DoT itself has noted that the cost of providing 20 mph zones with self-enforcing measures over large areas could be prohibitive. A figure in excess of £500,000 would appear to be more plausible in the case of the Chichester proposals, and I am sure such funds could be better spent than in respect of the proposed scheme.

I trust that you will treat fully and fairly with my objections and would ask that you please advise me of your response in the case of each of the points I have highlighted.

Yours faithfully

The signature and name of the sender are redacted with black bars.

Copy to: Mr Mike Hall, Chairman, South Chichester County Local Committee  
Mr Lionel Barnard, Cabinet Member for Highways & Transport, West Sussex County Council  
Mr Tony Kershaw, Head of Legal & Democratic Services, West Sussex County Council

## Proposed Chichester 20mph speed zone

### (former Group Manager in charge of Local Transport Planning, WSCC)

I support the concept in principle and would love to see safer residential roads in Chichester. But, I cannot support the proposals for a blanket cover of the City. I consider this a waste of public money for the following reasons;

1. Controlling traffic speed just by the provision of 20 mph road signs will not work on most roads. This is obvious with the current 20 mph restrictions in West Street where even the buses still travel at 30 mph!
2. For this to be effective any such control must be self-enforcing by the introduction of suitable complementary traffic calming measures and significant and regular enforcement, not just lip-service.
3. Traffic calming measures include chicanes, raised platforms, sleeping policemen, raised pads etc. Some are more appropriate than others in specific areas. There is no single solution for all roads e.g. bumps are to be avoided on bus routes. Without these measures periodic enforcement will be ineffective.
4. I believe chicanes are the most effective since humps, pads, platforms and bumps are ineffective for slowing down larger 4x4 off-road vehicles.
5. On street parking can provide a supporting means of slowing cars down and these 20 mph proposals should be developed in conjunction with the emerging Chichester Parking Plan that is also soon to be consulted on.
6. In my opinion, to provide sufficient traffic calming measures for the area proposed will cost several million pounds.
7. Regular enforcement does not mean the odd police visit when there are a number of complaints from the public or a few well worded letters in the Observer. It means significant visible enforcement that is followed through to prosecutions that are then made public. Controlling parking around schools is a clear example of the ineffectiveness of poor enforcement.
8. Quite frankly I do not consider the Police have the resources or time for this enforcement. They are already understaffed, overworked and rarely seen in Chichester. And, they clearly must have higher priorities. The comment in the WSCC literature that Sussex Police are 'key partners' in this is rather stating the obvious. But, I find it hard to believe that they have their hearts in this further demanding new initiative.

My view is that there should be a concentration of the limited resources of WSCC and the Police on specific roads that have been identified as consistent problems, particularly those near schools. Targeting these with physical measures backed up by regular enforcement should work and set a clear message to drivers. Further roads can be considered and added as resources become available.