

Traffic Calming in Ilkley – Bradford Council consultation

Speed Limit Order & Road Humps – July 2023

Ilkley Civic Society submitted two statements to support its objections to the proposals published by CBMDC. Whilst the society supports the broad principle of introducing 20mph limits and appropriate traffic calming in some places we do not believe the current proposals represent the optimum solution for road safety or the environment (built & natural).

Ilkley Civic Society wishes to see a scheme of speed reduction that is designed to improve safety of all users of the streets and the environment (built and natural) of the town taking all relevant issues into account but concludes that this scheme does neither being solely highways- based. In the town centre we suggest an Urban Realm Study is conducted (Bradford council is committed to this). At schools and other locations further improvements (Including 20mph limits) need further design work of a quality appropriate to the location for which numerous alternative solutions may exist. These solutions would be in line with Policy and Objectives outlined in the Ilkley Town Council Neighbourhood Plan.

Our comments take the following subject areas in turn-

Consultation Process for both documents – the timing and period of consultation appeared to be designed to limit participation, being in the summer holiday period and only for 3 weeks ending 12 noon on 28th July. The hard copy documents available in Ilkley Library, restricted this time even further being available only until 24th July. No evidence was provided of amendments following the public consultation of early 2023.

Speed Limit Order

Statement of reasons - whilst supporting the very brief document consisting of two short reasons of 'Avoiding danger' and 'preserving and /or improving amenities...' we do not agree that the proposals achieve these aims and consider that sufficient justification is provided. One key area where we agree action is needed, however, is around schools. Two schools however on the A65 are not fully covered within the proposed 20mph zone and all currently have completely different types of signing which could be rationalised to achieve the desired aims of improving safety for pupils, parents, staff and visitors

No information was provided regarding the involvement/ support of the emergency services and bus companies to either set of proposals.

No reasons were given for the 20mph zone boundaries which were not based on the accident statistics produced at the public consultation neither were these available afterwards.

Errors & Omissions- some streets were missing from the official list and existing features also missing including humps, bus routes. No information in the form of detailed drawings of any features/signage was included and those provided were the original layout drawings prepared for the public consultation.

Under 'background' to this consultation & 'history', no information was provided in these sections which suggested that previous public consultation had been ignored. No results of the consultation were included (Brief analysis sent to ITC separately) and no analysis of the responses has been provided. We are concerned with the use of the word 'Illustrative' in the legal documents since this would allow CBMDC to change the limits once the Order is made.

Construction of Road Humps Order

Statement of reasons and Background – No information is provided.

'Locations, Nature and dimensions' table –

We note 72 locations including 164 items of highway changes are proposed. We think this is excessive and environmentally damaging. The Department for Transport now recommend the minimisation of use of these measures due to increased air pollution caused by their introduction. Noise and vibration can also be an issue.

No information is provided regarding street signage at the entrance to the zones and intermittent 20 mph roundels within the zone nor how street clutter will be minimised particularly in the 3 Conservation Areas.

Many of the sites are shown with 2 or 3 cushions on the road but with no indication of how these will be laid out or how parking and drainage is taken into account.

The two drawings of the zone are shown as 'Amended' but no amendment details are shown and they are dated 09.05.22 (before the public consultation) and noted as 'Original' thus implying that after the public consultation all comments were ignored and no changes made.

CBMDC has refused to issue copies of other information available at the public consultation, including accident locations and severity plus results of a speeding survey which should provide part of the information to justify the scheme.

No information has been provided of the consultation required with the emergency services as required by the same sec 90C of the Highways Act being used to introduce these proposals.

A large proportion of the proposed 20mph zone is currently designated as Conservation Areas and the proposals will have a negative effect on those areas that national policy states is 'desirable to preserve or enhance' Planning (Listed Buildings and Conservation areas) Act

1990. We can see no measures that have been taken to comply with this Act. CBMDC own Conservation Area Appraisals require the council to 'Improve the quality and amenity value of the **public realm**, open spaces and **highway materials**' in Ilkley by consultation with the design and conservation teams. No indication is given that this has taken place in order to minimise street clutter and road markings. We still await from CBMDC both the 'Design Guidance' document committed to in 2006 and the **Urban Realm Study** committed to in 2019 following the introduction of new street parking regulations.

Policy – The proposal fails to comply with HM Govt 'Local Transport Note' which states in the initial consultation stage 'Objectives' should be set and the 'Road Hierarchy' identified. Neither of these requirements has been complied with.