

Response to Gloucestershire County Council's Cheltenham Speed and Road Safety Improvements Consultation

Introduction

Cheltenham Civic Society welcomes the apparent ambition behind the Cheltenham Speed and Road Safety Improvements programme and supports the objective of reducing casualties, improving road safety, encouraging active travel and creating attractive neighbourhoods.

However, the success of any intervention will depend not on the scale of the measures proposed but on whether those measures are demonstrably evidence-led, proportionate, targeted at identified problems and capable of delivering meaningful improvements in safety.

As the Highway Authority, Gloucestershire County Council is under a duty to act objectively, fairly, transparently and proportionately when exercising its statutory functions. It is also subject to the Best Value duty under the Local Government Act 1999, requiring it to secure continuous improvement in the exercise of its functions, having regard to economy, efficiency and effectiveness. In practical terms, this requires the Council not only to identify a problem but also to demonstrate that the proposed solution represents an effective, proportionate and justifiable use of finite public resources when compared with reasonable alternatives.

The Society also notes that the well-established Gunning Principles governing public consultation require that:

- Consultation takes place while proposals remain at a formative stage.
- Consultees are provided with sufficient information to permit intelligent consideration and response.
- Adequate time is provided for consideration.
- Consultation responses are conscientiously taken into account before decisions are made.

Taken together, these duties and principles require more than the presentation of proposals and supporting data. They require a clear and transparent evidential chain linking identified problems, the causes of those problems and the measures proposed to address them. Consultees should be able to understand, scrutinise and test the

reasoning that has led Gloucestershire County Council to conclude that the proposed interventions represent the most appropriate response.

The Society is concerned that this consultation does not consistently establish that evidential chain.

Cheltenham has previous experience from the Boots Corner consultation of transport proposals becoming controversial and objectives being unrealisable because evidence, assumptions, objectives and expected outcomes were not presented with sufficient accuracy, relevance or transparency. Public confidence depends upon authoritative data, robust analysis, transparent decision-making and a demonstrable link between identified problems and proposed solutions.

Throughout the present consultation, collision locations are identified and casualty data is presented. However, the consultation frequently stops short of demonstrating the underlying causes of those incidents or explaining why widespread speed limit reductions represent the most effective response. The presence of collisions within an area does not, in itself, establish that vehicle speed was the primary causal factor nor that blanket speed reduction measures are the most appropriate intervention.

Transport policy must be founded on causation rather than correlation. Collision location must not be confused with collision cause; casualty density must not be confused with speed causation; and broad road safety aspirations must not be used as a substitute for demonstrating the effectiveness of specific measures.

The Society is also concerned that insufficient weight has been given to the condition of Cheltenham's roads, pavements and drainage infrastructure. Defective carriageways, deteriorating footways, poor surfaces, trip hazards, standing water and inadequate maintenance all contribute to road safety risks for motorists, cyclists, wheeled users and pedestrians.

Given the finite resources available to the Highway Authority, the consultation should demonstrate why the expenditure proposed within this programme represents a more effective means of improving safety than alternative investment in highway maintenance, repairs and infrastructure improvements. The Society is not persuaded that this case has been made convincingly.

Cheltenham Civic Society supports measures that are evidence-led, proportionate and demonstrably effective. Equally, the Society supports interventions that enhance the town's civic quality, respect its heritage significance and improve the experience of those who live, work and travel within Cheltenham.

The central question is therefore not whether road safety should be improved. It is whether the measures proposed have been shown – through objective evidence, transparent analysis and proper consideration of alternatives – to be the right

interventions, in the right locations, for the right reasons, and whether they represent the most effective use of public resources in pursuit of safer streets.

Causation must not be confused with correlation

Cheltenham Civic Society strongly emphasises that transport policy must be founded on causation, not correlation.

The presence of collisions within an area does not automatically demonstrate that vehicle speed was the primary causal factor, nor that speed reduction measures alone represent the correct intervention.

Likewise, the existence of casualty clusters does not itself justify blanket town centre-wide measures where the evidence indicates that incidents arise from specific geometric, operational or behavioural issues.

The Society is concerned that elements of the consultation risk: conflating collision location with collision cause; casualty density with speed causation; and general road safety objectives with specific speed interventions. These are not the same things.

The consultation material identifies collision hotspots, yet several locations appear to illustrate circumstances where road layout, highway design, visibility, crossing provision, junction treatment, previous interventions or the absence of intervention may themselves have materially contributed to the incidents.

Examples requiring examination include locations where casualties may reflect:

- Inadequate pedestrian crossing provision.
- Poor junction geometry.
- Roads that create barriers between people and the places they need to reach (severance).
- Constrained visibility.
- Pedestrian desire lines not matched by infrastructure.
- Highway layouts created or retained through previous authority decisions.
- Legacy traffic arrangements.

Where infrastructure contributes to risk, the lesson must be to improve infrastructure. That means more than simply painting cycle signs on the highway or installing advanced stop lines for cyclists. The Junction 2 proposals show a fundamental misunderstanding of the hazards around that crossing and lower High Street.

Cheltenham Civic Society is also concerned that the proposed expansion of 20mph areas appears to show limited direct correlation with several identified casualty

concentrations and does not always appear targeted at the specific mechanisms giving rise to incidents. This risks producing interventions that are only weakly connected to the identified problem. Such an approach is unhelpful because it may:

- Dilute focus from genuine safety interventions.
- Reduce confidence in the evidence base.
- Obscure opportunities to address authority-created hazards.
- Weaken public trust.

Where measures are not clearly linked to demonstrated causation, there is a risk that the programme may be perceived as pursuing broader traffic-management, environmental causes or vehicle-control objectives under the banner of road safety.

Cheltenham Civic Society does not assert this is the intention. However, the best means of avoiding such perceptions is through transparent evidence, authoritative datasets and explicit causal justification for each intervention. Such evidence and detailed analysis are sadly lacking in the consultation documents.

The objective should be to learn real lessons, not false lessons.

Specific Objections to the Proposed Approach

Cheltenham Civic Society has the following specific objections to the proposals:

1. Failure to demonstrate a causal link between speed and collisions.

Our review of the consultation's interactive collision map indicates that the majority of recorded incidents have occurred at junctions, crossing points and locations where different highway users interact. Gloucestershire County Council has not provided evidence demonstrating that vehicle speed was the primary causal factor in these incidents.

Without such evidence, it is difficult to conclude that blanket speed reduction measures represent the most appropriate or effective response. The consultation identifies where collisions occurred but does not adequately demonstrate why they occurred. The distinction between location and causation is fundamental.

2. Blanket measures are not justified by the distribution of collisions.

Many roads included within the proposed 20mph zones appear to have experienced few, if any, recorded collisions. The consultation does not adequately explain why roads with little or no collision history should be subject to the same interventions as locations with established safety concerns. This raises concerns that the proposed measures are being applied

on an area-wide basis rather than being targeted at demonstrable problems, which is neither financially astute nor operationally acceptable.

3. Road character and conditions are insufficiently recognised.

The consultation treats roads under a single street name as uniform corridors despite the fact that they often contain sections with very different characteristics. For example, a road may include:

- Residential sections.
- Commercial frontages.
- School environments.
- Wide and narrow carriageways.
- Different pedestrian activity levels.
- Different crossing arrangements.

A single speed management approach may therefore fail to reflect the actual conditions experienced by highway users. The Society considers that interventions should be based upon the specific characteristics and risks of individual sections rather than broad categorisation.

4. Failure to prioritise collision clusters and known problem locations.

The consultation appears to prioritise widespread speed limit changes over targeted interventions at collision clusters and identified problem locations. Where recurring incidents occur at specific junctions, crossings or highway layouts, priority should be given to addressing the underlying design issues through engineering, enforcement or infrastructure improvements. The current approach risks dispersing resources across large areas while leaving the root causes of collisions insufficiently addressed.

5. Reliance upon demographic assumptions is not evidenced.

The Society is concerned by suggestions that some proposed restrictions are justified by the presence of university students and other groups who are presumed to require additional protection. The consultation provides no evidence demonstrating that university students are disproportionately represented within the collision data used to justify these proposals, nor that their presence is itself a causal factor in the identified safety concerns.

Road safety policy should be based upon objective evidence of demonstrated risk rather than assumptions relating to particular demographic groups. Where demographic characteristics are relied upon to support interventions, the

supporting evidence should be published and capable of scrutiny. Policies founded upon unsupported assumptions risk weakening confidence in the evidence base and distracting attention from the actual causes of collisions.

6. Behaviour, training and enforcement are under-emphasised.

Many road safety issues arise from behaviour rather than infrastructure or speed limits alone. Examples include:

- Failure to observe the Highway Code.
- Failure to respect the hierarchy of road users.
- Careless driving.
- Illegal parking.
- Stopping on zig-zag markings.
- Failure to comply with existing restrictions.

The consultation places considerable emphasis on speed management but almost none on education, training, awareness and enforcement.

7. Existing enforcement appears inconsistent.

If compliance with existing highway regulations is already limited, there is legitimate concern about the effectiveness of introducing additional restrictions without a credible enforcement strategy. Residents frequently report illegal parking, obstruction and other highway offences that receive little visible enforcement attention. The Society would therefore welcome evidence regarding:

- Existing enforcement activity.
- Enforcement outcomes.
- Resource allocation.
- How compliance with any new restrictions will be achieved.

Introducing additional restrictions without demonstrating an ability to enforce existing ones risks reducing public confidence in the overall programme.

8. A targeted, evidence-led approach would be preferable.

The Society believes that resources should be focused on interventions that directly address demonstrated causes of collisions. These may include:

- Junction redesign.
- Improved pedestrian crossings.
- Better visibility.
- Highway maintenance.
- Enforcement activity.
- Education and awareness campaigns.
- Site-specific engineering measures.

Such an approach would provide a clearer link between identified problems and proposed solutions than the widespread application of blanket speed restrictions.

Support for a town-wide “place first” approach

Cheltenham is not simply a transport corridor. It is a Regency town whose streets and spaces form part of its heritage significance and attractiveness. The Society therefore broadly supports:

- Expanded residential 20mph zones where streets primarily function as places, such as shared spaces.
- Reduced speeds in safety-sensitive areas, such as outside schools.
- Active travel improvements.
- Evidence-based interventions at collision hotspots.

However, lower speeds should be delivered as part of wider place-making rather than traffic management alone.

Conservation areas require heritage-sensitive design

Large areas affected by these proposals sit within conservation areas or the settings of listed buildings. Once again, GCC should learn from another failed scheme in Cheltenham, Zone 15, by adopting a light touch, minimum clutter principle, including:

- Only changing designs where absolutely necessary and not just desirable or unevidenced.

- Reducing unnecessary signs and road markings.
- Heritage-appropriate materials, such as paler and narrower road markings.
- Avoiding new and/or excessive vertical infrastructure, such as posts.
- Integrating crossings with public realm improvements.
- Protecting historic streetscape elements.

Safety improvements should enhance and complement civic quality rather than diminish it.

Engineering should reflect street character, not rely solely on signage

The Society supports interventions at proven collision locations but notes that signage alone may not achieve behavioural change. Priority should be given to:

- Raised crossings.
- Continuous footways.
- Improved pedestrian priority.
- Visual street narrowing.
- Surface treatments and landscaping.
- Self-explaining streets.
- Using vehicles parked in authorised locations and existing features to slow traffic.

Design should influence behaviour naturally. Examples should be sought from overseas as well as similar conservation-led places in Britain.

Town centre opportunity

The programme presents an opportunity extending beyond casualty reduction. Cheltenham should seek to integrate:

- Road safety.
- Public realm enhancement.
- Heritage conservation.
- Active travel.

- Civic place-making.

The town should aspire to streets that are both safer and more beautiful. These conditions are not mutually exclusive.

Monitoring and accountability

The Society requests publication of:

- Full collision data.
- Speed surveys.
- Pedestrian and cycle counts.
- Intervention evaluation reports.
- Post-scheme reviews.

This information should remain publicly accessible and form the evidence base for any schemes.

Conclusion

Cheltenham Civic Society supports the objective of reducing casualties, improving road safety, encouraging active travel and creating attractive neighbourhoods. The issue is not whether safety should be improved, but whether the measures proposed have been shown to be the right interventions in the right locations.

The consultation identifies where collisions have occurred but does not consistently demonstrate why they occurred, whether vehicle speed was the primary causal factor, or why widespread speed limit reductions represent the most effective response. Collision location must not be confused with collision cause and the evidence presented does not establish a sufficiently clear link between the problems identified and the solutions proposed.

The Society remains concerned that the programme relies heavily on area-wide measures while giving insufficient attention to site-specific engineering solutions, highway maintenance, enforcement, behavioural factors and other interventions that may address risk more directly and effectively. Nor has it been demonstrated that the programme represents the best use of finite public resources when compared with alternative investments in Cheltenham's roads, pavements, drainage infrastructure and public realm.

Any interventions should be proportionate, targeted, evidence-based and capable of objective evaluation. They should also respect Cheltenham's distinctive heritage, enhance civic quality and contribute to streets that function successfully both as transport routes and as places.

The Society therefore urges Gloucestershire County Council to strengthen the evidence base, provide a clearer justification for each intervention, demonstrate compliance with its Best Value obligations and commit to transparent monitoring of outcomes. This would help ensure that decisions are founded on demonstrable evidence and that public confidence is maintained through openness, accountability and measurable results.

The objective should not simply be to implement a programme of measures, but to deliver the interventions that achieve the greatest improvement in safety, place quality and public value for Cheltenham.

Andrew Booton

Chair, Cheltenham Civic Society

June 2026