

OBJECTION A

FORMAL OBJECTION^[1]_[SEP]

Re: Proposed 20mph Zone and Traffic Calming Measures – St Thomas More School Area (Ratcliffe Road, Leicester)

I. INTRODUCTION

This document constitutes a formal objection to the proposed implementation of a 20mph speed limit and associated traffic calming measures on Ratcliffe Road and the surrounding vicinity of St Thomas More School, as notified in your correspondence dated 15 July 2025.

This objection is submitted in accordance with the statutory consultation process and is grounded in the provisions of the National Planning Policy Framework (NPPF), the Environment Act 2021, and other relevant planning and statutory considerations.

As a resident we are writing to formally object to any proposed installation of traffic calming measures in the form of speed cushions / bumps on Ratcliffe road but fully support the proposed speed limit to be reduced to 20mph as outlined in your letter which was shown to us by another resident on Ratcliffe road.

*We also would like to express deep concern over the adequacy of community consultation as we have **not received** any letter from the council with the formal proposals. There has also been no information placed in public spaces on Ratcliffe road with regards the proposals. I believe that there are other residents in the area who have also not received your letter which would suggest these proposals have not had the opportunity for sufficient consultation and you are trying to sweep changes in 'under the carpet'.*

This also makes us question if the speed bumps which have been installed on Carisbrook Road have actually had full community consultation too. The only reason it has been brought to our attention was because we were informed by another resident on Ratcliffe road who had received your letter.

Under the Localism Act 2011 and NPPF paragraph 39, local authorities are required to engage in consultation with residents and local communities which clearly is not the case. **We have NEVER received any communication from you with regards these proposals.**

II. LEGAL AND POLICY GROUNDS FOR OBJECTION 1. Failure to Demonstrate Need and Proportionality

The proposal fails to demonstrate the necessary evidentiary basis for imposing a 20mph speed limit and associated traffic-calming infrastructure. Under **NPPF paragraph 111**, development should not result in unacceptable impacts on highway safety or lead to residual cumulative impacts that are severe. No such impacts have been clearly demonstrated in this case.

Further, the absence of a publicly available traffic assessment or collision data calls into question the proportionality and justification of the proposed intervention.

We have lived on Ratcliffe road for over 24 years and have only ever seen one accident on Ratcliffe road. ***Your proposals to install 9 speed cushions on Ratcliffe road are excessive for a road that is roughly 600 yards long and a complete waste of taxpayers' money.***

2. Adverse Impact on Residential Amenity

The proposed raised cushions and physical alterations are likely to give rise to excessive noise, vibrations, and reduced vehicular access for residents. This would particularly affect households with young children, elderly occupants, individuals with mobility impairments, and households reliant on private vehicle access. Such impacts are contrary to **Article 8 of the European Convention on Human Rights (ECHR)**, which protects the right to private and family life, including peaceful enjoyment of one's home.

3. Traffic Efficiency and Highway Safety Risks

The implementation of raised features in a narrow residential area such as Ratcliffe Road will likely impede traffic flow, reduce road efficiency, and create new hazards caused by vehicles abrupt braking or swerving to avoid the speed bumps which would result in unsafe driving behaviour. This would also be the case for your proposals on Knighton Road.

In addition to this it will cause addition congestion due to families dropping children at school and residents parking on Ratcliffe Road who would park in between the speed bumps.

The speed bumps are also particularly concerning in the context of emergency vehicle access and peak-time traffic movements. The Council must ensure compliance with its obligations under the **Road Traffic Regulation Act 1984**, which requires that any traffic order balances efficiency with safety and access.

4. Conservation Area and Heritage Considerations

The proposed works would materially alter the character of the area, which lies within the setting of **Inglewood (a Listed Building)** and a designated **Conservation Area**. Pursuant to the **Planning (Listed Buildings and Conservation Areas) Act 1990**, local authorities must have special regard to the desirability of preserving the setting and character of listed buildings and conservation areas. Installation of raised speed cushions would be inconsistent with these statutory duties.

5. Lack of Adequate Public Consultation

The Council has failed to conduct adequate and meaningful consultation with affected residents, including those on Ratcliffe Road, Ratcliffe Court, and Kingston Road. This omission is in breach of **NPPF paragraph 39**, which states that early engagement and effective consultation should be integral to plan-making and decision-taking processes.

As we mentioned earlier in our letter, we have not received any letter from yourselves with regards the proposals and to my knowledge there are other residents who have not received any communication either.

6. Environmental and Equalities Concerns

The proposal introduces physical barriers that may disproportionately affect persons with disabilities, cyclists, and those dependent on mobility aids. It may also lead to increased vehicle emissions due to speed changes, undermining commitments under the **Environment Act 2021** and the Council's own environmental strategy. Compliance with the **Equality Act 2010** and its Public Sector Equality Duty (PSED) is required to avoid discriminatory impacts.

III. ALTERNATIVE MEASURES

Should the Council determine that intervention is warranted, I urge the council to consider less invasive and more proportionate alternatives should be considered, including:

- Enhanced signage and visual warnings.
- Educational initiatives within the school community.
- Installing of chicanes which would be more appropriate in our neighbourhood.

These measures would achieve safety objectives without the environmental, legal, and practical drawbacks outlined above.

IV. CONCLUSION

In light of the aforementioned considerations, I respectfully request that Leicester City Council:

1. Withdraw the current proposal for the associated physical alterations.
2. Undertake a comprehensive and evidence-based assessment of traffic and safety risks in the area.
3. Conduct a lawful and inclusive consultation process in line with statutory requirements.
4. Consider less intrusive alternatives that better align with legal duties, community needs, and sustainable development objectives.

Please confirm receipt of this objection and notify me of all future developments or decisions regarding this proposal.

OBJECTION B

Re: St Thomas More School Area – proposed 20mph Zone

I am writing to formally object to any proposed installation of traffic calming measures in the form of speed cushions/humps on Ratcliffe Road but fully support the proposed 20mph speed limit as outlined in your letter dated 25 July 2025.

As a resident of Ratcliffe Road I believe this proposal is inappropriate for our community and raises significant concerns under English planning law and associated guidance not least because a new 20mph limit should demonstrably be shown to **not** work before other measures are considered. Below is my detailed objection:

Lack of Demonstrated Need and Proportionality

Under the Town and Country Planning Act 1990 and the National Planning Policy Framework (NPPF) (2023), planning decisions must be evidence-based and proportionate to the identified need. The council has not provided sufficient data to justify the installation of speed cushions, such as accident statistics, traffic speed surveys, or evidence of persistent speeding on Ratcliffe Road. Without clear evidence, this proposal risks being an unnecessary intervention, contrary to NPPF paragraph 11, which emphasizes sustainable development that meets genuine local need.

Impact on Residential Amenity

The installation of speed cushions is likely to adversely affect the residential amenity of Ratcliffe Road residents, contravening NPPF paragraph 130(f), which requires developments to create places with a high standard of amenity. Speed cushions may cause increased noise and vibration from vehicles, particularly for properties close to the proposed locations. This is especially concerning for households with young children, elderly residents, or those with mobility issues, who may experience disruption to their quiet enjoyment of their homes.

Potential for Increased Traffic Congestion and Safety Risks

The Highways Act 1980 and Department for Transport (DfT) guidance on traffic calming measures (e.g., Local Transport Note 1/07) require that road alterations prioritize safety and efficiency. Speed cushions may inadvertently increase congestion by causing vehicles to slow excessively or swerve, potentially leading to unsafe driving behaviour on Ratcliffe Road, which is a narrow residential street by virtue of the cobbled edging [note also that this is a feature of the conservation area], this could exacerbate traffic flow issues.

Conservation Area

Speed bumps appear to be planned in the immediate vicinity of Inglewood, a Listed and significant Arts and Crafts house. Speed humps would also change the character of the road and therefore would not be conducive to the Conservation Area or Listed status of Inglewood.

Inadequate Community Consultation

Under the Localism Act 2011 and NPPF paragraph 39, local authorities are required to engage meaningfully with communities on planning proposals. The consultation process for this proposal has been insufficient with limited notice provided or no public meeting held, preventing residents from fully understanding the impacts or exploring alternatives. This lack of engagement undermines the principles of transparent and inclusive decision-making. TO MY KNOWLEDGE NOT ALL RESIDENTS ON RATCLIFFE ROAD including Knighton Hayes and Ratcliffe Court HAVE BEEN NOTIFIED OF THESE PROPOSALS BY LCC.

Environmental and Accessibility Concerns

Speed cushions may disproportionately impact certain groups, such as cyclists and those with mobility impairments, as noted in DfT guidance on inclusive mobility (Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure, 2021). Furthermore, increased vehicle emissions from braking and accelerating over cushions could conflict with the council's obligations under the Environment Act 2021 to improve air quality and reduce carbon emissions.

Proposed Alternatives

Rather than installing speed cushions, I urge the council to consider less invasive traffic calming measures, such as improved signage, speed limit enforcement, or community-led initiatives like speed watch programs, which align better with local needs and NPPF sustainability objectives.

In conclusion, I respectfully request that the council reconsider this proposal in light of the concerns raised, which are grounded in English planning law and guidance. Please keep me informed of any developments regarding this proposal.

Please ask for: Mr Graham Seaton
Tel: 0116 454 2868
Email: Graham.Seaton@leicester.gov.uk
Website: www.leicester.gov.uk
Our ref:

Date: TBC



<< NAME HERE >>
<< ADDRESS HERE >>

Dear << NAME HERE >>,

ST THOMAS MORE SCHOOL AREA – PROPOSED 20MPH ZONE

A consultation pack (which included a letter, scheme plans, and a response form to record resident's opinions) was hand delivered to all properties inside the 20mph Zone. The information was also published on the Leicester City Council website.

Thank you for your response to this consultation.

For OBJECTION A response use: - Your objection (to the proposed implementation of a 20mph speed limit and associated traffic calming measures on Ratcliffe Road and the surrounding vicinity of St Thomas More School) has been considered, and the following information can be provided as a response.

For OBJECTION B response use: - Your objection (to any proposed installation of traffic calming measures in the form of speed cushions/humps on Ratcliffe Road) has been considered, and the following information can be provided as a response.

Planning policy does not relate to the installation of traffic calming as this is instead governed by the Highways Act 1980. The planning legislation relates to development on private land, which sometimes includes works within the highway associated with the development. Similarly, the National Planning Policy Framework (NPPF) only relates to Local Plan making and taking decisions on planning applications, so any references to NPPF paragraphs are used out of context as they relate to planning functions (presumption in favour of sustainable development, consultation and engagement when developing Local Plans, and impact on residential amenity when considering development proposals).

The traffic calming has been proposed in accordance with national guidance and are consistent with similar successful traffic calming schemes that have been installed in Leicester. The speed cushions are designed in such a way that, when vehicles travel over them at the correct speed, they should not give rise to excessive noise, vibrations, or cause access issues. Vehicles are also able to park over speed cushions so there will be no change to the existing parking. As part of the consultation process the emergency services have all been consulted and no concerns or objections have been raised.

The traffic calming is not within the curtilage of any listed buildings, so would not need consent directly from that. There are technical tests around impact on the character and appearance of the conservation area, or impact on the significance of the listed building, but only where works are 'development' and need a planning consent in the first place.

Equalities implications: - The impact of the scheme is considered to be neutral for the majority of groups, however it should have a positive impact for disabled and older people and children as these are particularly vulnerable to road traffic collisions. Protected Characteristics under the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Climate Emergency implications: - Any positive effects from the 20mph scheme coupled with traffic calming measures will result in lower emissions and improved air quality. Lower spacing between calming measures such as speed cushions is required to avoid over-acceleration of motorists that would lead to increased emissions from erratic acceleration/deceleration. Correct implementation of such measures will result in a NET improvement in air quality and reduction in unwanted emissions. Furthermore, the City Cycle Action Plan sets out 20mph zones as a strategic priority to meet its target of doubling every day cycling numbers. If 20mph zones and traffic calming in the city are successful in reducing congestion and improving road safety, this may have a positive impact on people's travel choices, leading to substantial numbers of current car trips changing to cycling and walking trips.

Leicester City Council has already considered alternative measures, including the ones suggested, however the alternatives are either not possible (such as not meeting the national criteria for speed enforcement) or give no confidence (such as improved signs) in reducing vehicle speeds to an acceptable level.

There are therefore no reasons identified to withdraw the current proposal and the views and opinions of all residents that responded to the consultation will be used to decide if these proposals should be implemented.

Yours faithfully

Transport Strategy Section
Leicester City Council