

## Notice of Proposal: Tuffley Avenue

29<sup>th</sup> January 2026 – 20<sup>th</sup> February 2026

Consultees	Comments
Stagecoach	<p>I am writing to express my full support for the proposed 20mph speed limit and associated traffic calming measures along Tuffley Avenue, as outlined in the public notice dated 29 January 2026.</p> <p>Having reviewed the consultation documents, I believe this scheme will deliver meaningful improvements to road safety, driver behaviour, and the quality of life for residents, pedestrians, and road users in the area.</p> <p><b>Reasons for Support</b></p> <ol style="list-style-type: none"><li>1. Improved Safety for Pedestrians and Schoolchildren<ol style="list-style-type: none"><li>a. The proposal specifically highlights safety benefits for vulnerable road users, including pupils attending Calton Primary School and local cyclists. Introducing a 20mph limit and replacing priority give-way features with speed cushions and delineator islands will better control vehicle speeds and reduce risk of collisions.</li></ol></li><li>2. Evidence-Based Intervention<ol style="list-style-type: none"><li>a. Speed data gathered during the assessment shows that average vehicle speeds fall within intervention thresholds recommended for a 20mph limit. Additionally, collision records indicate 11 personal-injury collisions in the past five years, demonstrating a clear need for intervention.</li></ol></li><li>3. Consistency of Speed Limits Across the Local Area<ol style="list-style-type: none"><li>a. Aligning Tuffley Avenue with neighbouring 20mph zones will encourage more predictable driving behaviour and create a safer, more cohesive road environment.</li></ol></li><li>4. Balanced Use of Physical and Visual Calming Measures<ol style="list-style-type: none"><li>a. The scheme thoughtfully combines physical features—such as flat-topped speed cushions and Rediweld delineator islands—with virtual 3D cushions to deliver speed reduction in a way that maintains access for buses and emergency vehicles. This approach is both practical and effective.</li></ol></li></ol> <p><b>Conclusion</b></p> <p>For the reasons outlined above, I am strongly supportive of the proposed Traffic Regulation Order and traffic calming features for Tuffley Avenue. I believe the scheme is both justified and proportionate and will provide long-term safety and community benefits.</p> <p>Please accept this correspondence as a formal representation in support of the proposal.</p> <p>Kind Regards</p>

Objection 1

Formal Objection to Proposed 20mph Speed Limit

Tuffley Avenue, Gloucester

TRO reference 5227-126\*\*

Dear Sir or Madam,

I write to lodge a **formal objection** to the proposed Traffic Regulation Order to introduce a mandatory 20mph speed limit along the full length of Tuffley Avenue.

This objection follows earlier **informal representations** I submitted during pre-engagement, in which I raised substantive concerns regarding flawed speed data, evidential misapplication of national guidance, and the premature nature of the proposal. Those concerns were dismissed without adequate justification. I therefore now place this objection formally on the statutory record.

My objection is grounded in **material considerations, procedural fairness**, and the proper application of national guidance and statutory duties under the Road Traffic Regulation Act 1984.

1. Reliance on non-representative and contaminated speed data

The Statement of Reasons asserts that mean vehicle speeds of approximately 24mph justify the proposed 20mph limit. However, this data was collected **after the installation of traffic calming features that the Council now proposes to remove or materially alter**, and in close proximity to such features and signalised junction influence.

The Council has acknowledged that the existing layout is being revised following review. It is therefore irrational to rely on speed data generated under **temporary and constrained conditions** that will no longer exist once the scheme is implemented.

Despite this, the Council has stated it does not intend to undertake further speed surveys, instead asserting that replacement features will “keep speeds at the level we have now”. This is a **predictive assumption**, not evidence.

National guidance requires speed data to be **representative of the road environment to which the speed limit will apply**. Data collected adjacent to speed cushions, build-outs, and junction influence cannot reasonably be described as free-flowing or representative of baseline driver behaviour along the wider length of the road.

Proceeding to make a permanent speed limit Order on this basis would amount to reliance on **evidence the authority knows will cease to be representative**, which is procedurally unsound.

## 2. Prematurity and failure to assess the post-works environment

The proposed TRO seeks to introduce a permanent regulatory change **before the revised traffic layout has been installed, settled, and evaluated**.

A rational and evidence-led approach would require:

- completion of the proposed works,
- a bedding-in period,
- and fresh speed surveys undertaken away from physical speed mitigation features.

To refuse to carry out such surveys, while accepting they would be reasonable, but to proceed regardless, is to knowingly take a decision without adequate evidence of future conditions. This exposes the decision to challenge on the grounds of **prematurity and failure to take account of material considerations**.

## 3. Collision data cited without causation analysis

The Statement of Reasons refers to 11 personal injury collisions over five years but provides **no analysis of causation, location, or contributory factors**, nor whether those incidents relate to speed or to priority conflict and layout.

Residents are aware of collisions associated with the recently installed build-outs, which are now proposed for removal. The Council has not clarified whether these incidents are included in the cited figures or whether collision patterns changed following the 2023 intervention.

Without linking collision data to excessive speed, the Council has not demonstrated that a 20mph limit is an effective or proportionate response to the risks identified.

## 4. Misapplication of DfT Circular 01/2013

DfT Circular 01/2013 makes clear that 20mph limits should normally be introduced where:

1. mean speeds are already low without reliance on significant engineering measures, and
2. the road environment naturally supports lower speeds.

In this case, the cited mean speed was achieved only through physical features now acknowledged as requiring removal or replacement. Once removed, the natural mean speed of the road has not been assessed.

Introducing a signed-only 20mph limit on the basis of data generated by features no longer in place directly contradicts the rationale of the guidance, even if selective passages are cited in support.

#### 5. Failure to demonstrate necessity or proportionality

The Council's own correspondence accepts that more effective speed enforcement tools exist but are not being pursued due to prioritisation and funding considerations. While resource constraints are understandable, they do not justify implementing a **less effective regulatory measure** without clear evidence of necessity.

Section 122 of the Road Traffic Regulation Act 1984 requires the authority to balance safety with the expeditious and convenient movement of traffic. No evidence has been presented to demonstrate that this balance has been properly assessed in light of the road's classification, function, and traffic mix.

#### 6. Requested actions

In light of the above, I formally request that the Council:

1. **Pause progression of the proposed 20mph TRO**, and
2. **Undertake fresh average speed surveys:**
  - a) after the proposed works are completed,
  - b) at locations not influenced by speed cushions, build-outs, or junction control, and
  - c) over a sufficient duration to capture representative conditions.

Only once representative post-works data is available can a rational and evidence-led decision be made as to whether a reduced speed limit is justified.

#### Conclusion

I respectfully submit that proceeding with the proposed 20mph speed limit at this stage would rely on evidence known to be flawed, assume future outcomes without verification, and fail to properly address material considerations raised during consultation.

This objection is therefore made formally and robustly, and I request that it be fully considered and explicitly addressed in any report or decision relating to the making of the Order.

	Yours faithfully,
Objection 2	<p>This is a formal objection to the proposed 20mph scheme for Tuffley Avenue.</p> <p>I am writing as a resident directly affected by these plans. My objection is not mainly about the speed cushions or the signs, but about how this has been handled from the start. Once again, it feels like decisions have been made behind closed doors and we are only being told about it after everything has been decided.</p> <p>The council talks about safety and consultation, but the way this scheme has appeared, with no prior warning to the people who live here, shows the exact opposite. It makes all the promises about listening to the community seem empty.</p> <p>There are serious questions about this plan that haven't been answered, and that should have been sorted out with residents before it was drawn up and advertised:</p> <ol style="list-style-type: none"> <li>1. Where is the real evidence this specific design is needed? The documents mention speed data and past collisions, but they don't show how these specific speed cushions and painted illusions were chosen over other options. Was there any proper discussion with people who drive, walk, and cycle down this road every day about what actually causes problems here? Or was this just copied from a standard plan?</li> <li>2. How can we trust the process when it starts with a secret? The first most of us heard about this was seeing the official notice. That is not consultation. That is being presented with a finished product. After years of being told the council will engage with us on this issue, this feels like a betrayal. It completely undermines trust and makes people think the so-called "consultation" is just a box-ticking exercise you have to get through.</li> </ol> <p>Because of this, I cannot and do not support this scheme in its current form.</p> <p>A proper scheme for our road needs to be built on trust and proper evidence, not on decisions made elsewhere and then sprung on us. The complete lack of early communication shows a fundamental flaw in how this project was run, and that flaw casts doubt on the entire proposal.</p> <p>I expect this objection to be recorded and for these points to be addressed fully before any further steps are taken.</p> <p>Yours sincerely,</p>
Objection 3	<p>Please see attached my views and comments relating to the proposed changes along Tuffley Avenue.</p> <p>Firstly, your inclusivity of the consultation, which comes across as the county trying to sweep this change under the rug, as no letter drop has been undertaken to inform local stakeholders of this consultation, something I would have to do for one of our housing developments. Further to this I note your discrimination checklist states these changes would not discriminate against those with disabilities, yet your consultation process neglects those who are vulnerable and who may not be able to leave their house, putting them in the lurch about these changes which may impact the enjoyment of their residencies.</p>

Secondly, what quantifies the locations chosen as their locations appear sporadic as to try and resolve a problem exacerbated from previous interventions, is it distance from a junction relating to SSDs?, fixed distances every few hundred meters? Because surely these interventions should come from a reason, we assume incident hotspots, but where is this evidence base in the consultation to justify the proposals? Because there seems to be no rhyme or reason to the proposals, especially the absolutely pointless visual speed bump which would be ignored by those familiar with the road.

How will the 20 be enforced, will it just be vertical deflections, which we both know are not favourable of the MfS (or local councillors by residents repetitive complaints due to noise), Why not ANPR cameras located at key junctions to stop people using the local road network like a race circuit? As evidenced by the current interventions, outliers of the speed survey would show speeding still exists, undeterred by any speed hump, chichane etc. Those who already speed will continue to speed at excessive speeds.

The noise of the speed hump is atrocious when flatbed or tailored vehicles drive over them, or when vehicles accelerate. What's amusing is that larger vehicles can sail over them without needing to accelerate, vehicles of which carry a much higher risk. The introduction of the delineator island would only further worsen this issue by restricting drivers from centring themselves to the hump to minimise impact and subsequent noise.

Please could you provide the tracking to demonstrate that all affected properties can enter and exit their driveway in both directions without conflict, i assume this has been assessed, because I don't believe no.24 has a sufficient turning radii to exit their drive westward onto tuffley avenue, nor reverse onto their drive when coming from the east.

You note that vehicle speed data gathered during the assessment was within the Association of Chief Police Officers (ACPO) guideline intervention level for a 20mph speed limit of 24mph, but if the speed limit is 30, and vehicles travel 20% lower than sign posted limit what is the need to spend budget on if vehicles travel at a lower speed than the signposted limit.

Your collision data demonstrates there have been 11 personal injury collisions on this section of road in the last 5 year. I have first hand seen 2 of these in the past couple of years, which have been a result of the previous interventions, why will these new additions help, is the issue really speed, is it visibility at junctions (which i recognize their intervisibility would be improved if speeds reduced) but surely parking restrictions would improve this around hotspots. Also see attached several snapshots of ignorant drivers who will pay no regard to the new interventions.

You note that the approach aims to deliver a consistent message to drivers, reinforcing the need to adhere to the lower speed limit and align with other road speeds, to which the roads it connects are a 30, with the lesser residential roads being a 20, with the exception of podsmead road. So what do your current interventions achieve, do they not reduce speeds as desired? Again what would stop people from spending as current, especially along the 600m drag strip between the physical features of Newark Road and The

	<p>Oval? Surely more frequent interventions would be more beneficial (noting that the bus would struggle from podsmead road to seymour road (assuming this is the reason for "virtual" speed hump, a speed hump could be positioned to the west and would improve ssd (intervisibility being poor here due to overhanging hedgerows which CCH should enforce upon at the homeowners cost.</p> <p>The TRO consultation notes that the drawing is illustrative, therefore should any variation be made prior to an approval would be based on incorrect information, why has no topographical survey been undertaken for these areas, as surely this null and voids the consultation due to being an inaccurate proposal if calming features need to be moved to suit statutory assets in the road, dropped kerbs etc?</p> <p>So please, provide the evidence base for this proposal, ascertain the actual reasons for these incidents, poor visibility, poor pedestrian crossing points, parked vehicles etc.</p> <p>Can you just remove the haphazard chicanes which have increased highway risk, unnecessary noise, increased pollution due to the drivers inherent need to travel at the speed limit and introduce a sensible ANPR feature to control speeds.</p>
<p>Objection 4</p>	<p>I am writing to formally object to the proposed Traffic Order Scheme for Tuffley Avenue, as detailed in the circulated documents, including the Notice of Intention and the Statement of Reasons. After reviewing the consultation documents and considering the realities of traffic behaviour in the area, I believe that removing the existing priority give way islands will <i>reduce</i> road safety, increase speeds, and create secondary risks and traffic displacement that have not been properly assessed.</p> <p>The removal of the priority features will not improve safety, it is highly likely to reduce it. The existing islands compel drivers to slow down before passing, creating a meaningful speed-reduction point that is not replicated by the proposed measures. These features form part of the current calming strategy acknowledged in the scheme documentation. Their design requires drivers to actively slow down, assess oncoming traffic, and proceed cautiously. Unlike passive measures, such as signage or speed cushions, priority systems interrupt driver flow in a way that cannot be circumvented or ignored. Eliminating them would create a clear, continuous line of travel along Tuffley Avenue, enabling vehicles to pass at significantly higher speeds, especially during lighter traffic periods. By contrast, the current priority give ways introduce natural breaks in movement that slow drivers in a controlled, predictable way.</p> <p>Large Vehicles are not significantly impeded by the priority islands, the proposal suggests that the priority features impede buses and larger vehicles, yet this is not borne out in practice. Vans and buses already pass through these features without significant difficulty. The real constraint is the long-standing issue of unrestricted pavement parking, which narrows the routes, limits visibility, and forces dangerous manoeuvres, especially around the site of the islands, none of which are attributable to the priority give way islands.</p> <p>Removing an effective safety feature does nothing to resolve a parking-related problem.</p>

It appears likely, though not stated explicitly, that the recent accident involving school children may be a triggering factor behind the proposal. If so, this is not an evidence-based justification. That collision resulted from *poor driving behaviour*, not a flaw in the road layout.

To remove physical traffic-calming features because of an incident caused by driver error is analogous to removing traffic lights simply because someone ran a red light. The logic does not hold: infrastructure did not fail; the driver failed to comply with it.

The existing islands are one of the few measures on Tuffley Avenue that effectively *force* drivers to reduce speed—something the proposed measures do not replicate with the same reliability.

There has been a distinct lack of impact study on traffic displacement in the area, particularly on Tuffley Crescent. There appears to be no evidence of an impact assessment relating to how traffic may be displaced onto surrounding roads, particularly Tuffley Crescent. This omission is concerning, as Tuffley Crescent is already a well-known and heavily used rat-run to avoid existing safety measures on both Tuffley Avenue and Podsmead Road.

Any actual or perceived reduction or delay on Tuffley Avenue, such as removing priority features, adding speed cushions and road markings, will inevitably alter driver behaviour in the surrounding network. Without a displacement analysis, the full consequences of this proposal cannot be responsibly assessed.

Given the statutory consultation requirements outlined in the Statement of Reasons, including consideration of safe and expeditious movement under the Road Traffic Regulation Act 1984, it is reasonable to demand that surrounding roads, especially Tuffley Crescent, are properly reviewed before any change is approved.

There is a need for a full review of Parking Restrictions in and around this area.

The dangers arising from pavement parking on Tuffley Avenue and nearby streets are now considerable. Yet the proposal does not address this issue, despite it being the *primary* cause of obstruction and reduced visibility, and a significant contributing factor to driver hesitation or misjudgement. The parking situation forces vehicles into the centre of the road, blocks sightlines, creates unpredictable narrowing and increases the likelihood of collision at pinchpoints.

Before altering effective traffic-calming features, the Council should first undertake:

- A full review of parking restrictions on Tuffley Avenue
- A review of restrictions on adjacent roads already affected by displacement
- Consideration of enforcement capacity and compliance

Only once these wider and more pressing issues are addressed can any meaningful assessment of safety be made.

For the reasons above, I strongly oppose the removal of the priority give ways. They are proven, effective, and predictable safety devices that reduce speeds in a way the proposed measures cannot match. Furthermore, no proper assessment appears to have been made regarding traffic displacement or the significant and growing issues caused by pavement and double parking along with the utilisation of surrounding street to avoid any safety measures put in place.

The Road Traffic Act 1984 is a wholistic act and a wholistic solution is required, not a kneejerk reaction to one incident.

	<p>I would also like it noted that limiting notices to only those living on Tuffley Avenue was somewhat disingenuous as a minimum requirement. As a main artery in the area, any changes to this road will have a wider impact on the surrounding community. I am sure that many residents would attest to this if they had actually been given the opportunity to do so.</p> <p>I therefore request that:</p> <ol style="list-style-type: none"> <li>1. The priority give ways are retained.</li> <li>2. A full and wholistic study of traffic safety, parking and displacement in the immediate area, especially concerning Tuffley Crescent, is completed prior to any alterations.</li> <li>3. A comprehensive review of parking restrictions on Tuffley Avenue and surrounding streets is conducted before the scheme progresses any further.</li> </ol> <p>Thank you. Yours faithfully,</p>
<p>Objection 5</p>	<p>As a resident of over XXX years on Tuffley Avenue, I write in response to the Public Consultation for the proposed road changes on Tuffley Avenue, ref 5227-126</p> <p>I agree that the two build outs installed as part of the previous traffic calming scheme should be removed - due to traffic volumes and visibility issues these build outs impede traffic flow and are dangerous for both road users and pedestrians.</p> <p>I strongly object to the introduction of a 20 mph speed limit. A 20mph speed limit is unnecessary, contrary to national guidance and unjustified for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Unrepresentative data collected Speed data being used to support the introduction of this speed limit was collected in close proximity to the hazardous traffic calming measures that will be removed. Therefore this data is unrepresentative of normal speeds on Tuffley Avenue. Had the speed data being collected in different places on the road where there is free flowing traffic, the average speed would undoubtedly have been higher than the 24 mph being relied on to support this proposal.</li> <li>2. Misrepresentation of collision data Collision data is cited to support the 20 mph proposal, but there has been no analysis of the collision data to suggest that the collisions were due to excessive speed. As a resident, I am aware that a number of recent collisions were directly due to the buildouts and a number have been at the traffic lights in the middle of Tuffley Avenue, where traffic is already slowed by said traffic lights. The collision data has not been linked to speed so should not be used to support the introduction of the 20 mph speed limit. The collision data should be properly analysed to address what is actually causing collisions (traffic volume, visibility etc)</li> </ol>

	<p>It is not right to use data collected around features that will be removed to justify introducing a 20mph speed limit. A new speed survey should be undertaken when the new road layout is in place and the speed limit assessed at a later date.</p> <p>Regarding the raised bed on Tuffley Avenue, as with all residents who signed the petition to have the existing road layout removed, I believe the raised bed that was installed as an informal crossing should be removed. As also noted by the pupils, parents and children of the local primary school, it is not find as a crossing for motoring, visibility is poor for pedestrians, and it has created an extremely dangerous crossing point. This should be removed.</p> <p>Regarding this Consultation process, while a few notices attached to lampposts on Tuffley Avenue may have been spotted by local residents, it is unlikely they have been seen by the thousands of motorists who use this road so any feedback received will not be representative of the majority of road users.</p> <p>Please would you confirm receipt of this email and ensure my comments are recorded and reflected in this consultation process.</p> <p>Thanks</p>
Objection 6	<p>We have raised this issue before, XXXXX states there was no objections to removing the build outs and replacing with speed cushions. That is not technically correct, we did ask the question if the build outs/speed cushion with delineator islands were actually needed if overall road speed reduced. Also we asked if the individual locations for all proposed calming measues, replacing build outs was being reviewed as they had said they would be. Do they need to be located where there are currently.</p> <p>XXXXX says "build outs replaced with speed cushions" but what they are proposing to replace build outs with is not speed cushions but the " rediweld speed cushions with a delineator island". These are completely different things and have different impacts to the residents who live adjacent to it. How will residents park their cars if there is an island in the middle of the road. You're just removing one problem with another. The build outs need to be removed from the locations of where they are by the Wingate entrance is wrong and the same for the other build out by Neward Road, the replacement of them by rediweld islands need to be removed also. We already have enough to contend with with the incoming/outgoing traffic of Wingate which is a natural traffic calmer.</p> <p>I know there was a site visit and does that mean a review of traffic calming scheme along the whole road or just certain points. Will you address why our side of the Tuffley Avenue from the Wingate up to Stroud road has multiple things in place and the lower end just has the build out.</p>