

Traffic Order Report:

Proposed 20mph Speed Limit & Traffic Calming Features; Tuffley Avenue, Gloucester.

Version 1 – March 2026

Revision	Description	Author
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Traffic Order Title:

GLOUCESTERSHIRE COUNTY COUNCIL (20 MPH SPEED LIMIT) (TUFFLEY AVENUE) (GLOUCESTER CITY) ORDER 2026

Case Officer: Will Cox, Senior Traffic Engineer, ADL Traffic & Highways Engineering Ltd.

Senior Case Officer: Hannah Bassett-Louis, TRO Manager, Gloucestershire County Council (GCC).

1. Purpose of Report

- 1.1. To provide background information on the proposed Traffic Order (TO) entitled above.
- 1.2. To provide details of representations made in relation to the TO. A copy of the representations received is included in the appendices at the end of this report.
- 1.3. To make a recommendation to the Traffic and Active Travel Manager on the way forward.

2. Recommendation

That, for the reasons given in this report and after consideration of the representations made, GCC now:

- Makes the TO as advertised in January/February 2026; and
- Progresses to construction of the traffic calming features.

3. Background and Purpose of the Scheme

- 3.1. The proposal is to introduce a 20mph speed limit onto Tuffley Avenue for its entire length. It is also proposed to introduce/remove the traffic calming features outlined in the Schedule below.

Schedule – Traffic Calming Features

Location	Type	Height	Length	Width
Tuffley Avenue (C8011) approximately 22m west of its junction with Newark Road (481541)	Removal of Priority Give Way	n/a	n/a	n/a
Tuffley Avenue (C8011) approximately 127m east of its junction with The Oval (481545)	Removal of Priority Give Way	n/a	n/a	n/a
Tuffley Avenue (C8011) approximately 22m west of its junction with Newark Road (481541)	Install New Pair of Flat-Topped Road Cushions	75mm	2.0m	1.6m
Tuffley Avenue (C8011) approximately 127m east of its junction with The Oval (481545)	Install New Pair of Flat-Topped Road Cushions	75mm	2.0m	1.6m

Tuffley Avenue (C8011) approximately 22m west of its junction with Newark Road (481541)	Install New Rediweld Delineation Island	125mm	500mm	500mm
Tuffley Avenue (C8011) approximately 127m east of its junction with The Oval (481545)	Install New Rediweld Delineation Island	125mm	500mm	500mm
Tuffley Avenue (C8011) approximately 18m east of its junction with Tuffley Crescent (481548)	Install New Virtual 3D Road Cushions	Visual only	Visual 2.0m	Visual 1.6m
Tuffley Avenue (C8011) approximately 30m east of its junction with The Oval (481545)	Install New Virtual 3D Road Cushions	Visual only	Visual 2.0m	Visual 1.6m

- 3.2. This scheme is being proposed following a review of the existing speed limit and traffic calming measures along Tuffley Avenue. The proposed 20mph speed limit seeks to enhance road safety and amenity for all highway users, including pedestrians (particularly school children attending Calton Primary School) and cyclists, as well as improving the consistency of the speed limit with the surrounding area.
- 3.3. 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.
- 3.4. In addition to the proposed 20 mph speed limit, GCC's Engineering Team is planning a series of complementary traffic-calming measures to reinforce the reduction in vehicle speeds and enhance overall road safety. The proposal includes replacing some of the existing priority give-way features on Tuffley Avenue with speed cushions paired with delineator islands. These physical interventions are designed to create a vertical deflection that encourages drivers to slow down while maintaining accessibility for larger vehicles such as buses and emergency services.
- 3.5. Furthermore, the scheme introduces virtual speed cushions, which are high-visibility road markings that mimic the appearance of physical cushions. These are particularly effective in areas where installing full-height cushions may not be feasible, yet visual cues can still influence driver behaviour. By combining physical and virtual calming features, the approach aims to deliver a consistent message to drivers, reinforcing the need to adhere to the lower speed limit

4. Law and Policy

- 4.1. The Road Traffic Regulation Act 1984 sets out the legal basis for making TOs. The proposal meets with Section 84 of the Road Traffic Regulation Act 1984 which allows GCC, as the Traffic Authority, to make a TO to prohibit:
- (a) the driving of motor vehicles on that road at a speed exceeding that specified in the order,

- 4.2. Thorough consideration has been given to the factors set out in Section 122 of the Road Traffic Regulation Act 1984 in proposing this TO. This requires the local authority to secure the expeditious, convenient and safe movement of traffic (including pedestrians). In carrying out this exercise GCC must have regard to the:
- a) Desirability of securing and maintaining reasonable access to premises.
 - b) The effect on the amenities of any locality effected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the road(s) run.
 - c) The strategy prepared under Section 80 of the Environment Act 1995 (the national air quality strategy).
 - d) The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles.
 - e) Any other matters appearing to the local authority to be relevant.
- 4.3. Any changes are made in accordance with the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. Under this procedure authorities are expected to consult local community groups and the Police together with other organisations listed where appropriate, such as the other emergency services and transport operators.
- 4.4. GCC is required to advertise the draft TOs it intends to make, to allow a period for representations of support or objection to be submitted. After this consultation, GCC must consider any representations received and having done so, to either:
- a) Resolve to make a TO in the form originally intended and advertised; or
 - b) Modify the TO from the originally advertised and re-consult where necessary; or
 - c) Abandon the proposal altogether.
- 4.5. Significant modifications to the proposed TO would need to be consulted on with those that maybe affected to provide further opportunity for representations to be made.
- 4.6. Traffic Authorities have the flexibility to implement restrictions that are appropriate for an individual road, reflecting safety and road user needs whilst taking into account all local considerations.
- 4.7. Where the proposal includes the construction or alteration of traffic calming features such as road humps, speed cushions or traffic islands, these works are carried out under the powers contained in Sections 90A–90F and Section 90G of the Highways Act 1980 (as amended). These provisions require the Highway Authority to consult with the Police and any other bodies or persons likely to be affected, and to provide public notice of the intent to construct such features. The authority must consider any representations received before proceeding with the works.

5. Traffic Data

- 5.1. Several site assessments were made by the GCC Traffic Engineering team when considering the proposals, prior to the TO process being started. Careful consideration was given to the design of the proposed speed limit and associated traffic calming features in order to achieve the most appropriate scheme.

5.2. As part of the assessment of the proposed 20mph speed limit, Automatic Traffic Count (ATC) surveys were undertaken to ascertain whether the proposed speed limits would be enforceable and complied with by drivers. The surveys demonstrated that existing mean vehicle speeds were within to the Association of Chief Police Officers (ACPO) guideline intervention levels for the respective speed limits (See Appendix B).

6. Consultation on the proposed TO & Traffic Calming features

6.1. Statutory consultation for this proposed scheme was undertaken between 1st December 2025 & 22nd December 2025. A letter and plan were emailed to the Statutory Consultees and stakeholders explaining the proposals and the reasoning behind them. Consultees were able to respond via email or post.

6.2. Public consultation (Notice of Proposal) for this proposed scheme was undertaken between 29th January 2026 & 20th February 2026 with Notices placed on site, in the local newspaper (Gloucester Citizen & Echo), on GCC's website and hard copies were placed on deposit at Shire Hall (see Appendices A & C). The representations made can be found in Appendix D.

7. Objections/Support

7.1. The Statutory Consultees responded as follows:

Name	Comments
Hempsted & Westgate County Councillor	Supports the proposal
Tuffley & Moreland County Councillor	No comments received
District Council	No comments received
Freight Haulage Association	No comments received
Road Haulage Association	No comments received
Police	No comments received
Stagecoach	Supports the proposals
Fire & Rescue	No comments received
Ambulance Service	No comments received
Parking Enforcement Team	Offered no objection to the proposal
Local Highway Manager	Supports the proposal

7.2. Other responses received during the Public Consultation (Notice of Proposal):

Six responses were received from members of the public, all of which were objections to the proposals.

8. Details of Objections and Case Officer's Response

8.1. The first objection stated that the proposed 20mph speed limit on Tuffley Avenue is based on speed data that will not be representative, following the scheme implementation. They state this is because it was collected in conditions where there are traffic-calming features present, making the data unreliable for assessing a permanent speed limit change. The objector further states that GCC is acting prematurely by seeking to introduce a speed limit change before the revised layout has been installed, settled, and properly evaluated through new, speed surveys. They add that GCC has cited collision numbers without analysing causation,

contributory factors, or any link to excessive speed, and has misapplied DfT Circular 01/2013 (Setting Local Speed Limits) by relying on mean speeds, which they state are artificially reduced by engineering measures that will no longer exist. The objector also contends that GCC has failed to demonstrate necessity or proportionality under Section 122 of the Road Traffic Regulation Act 1984 and has not shown that the proposed limit is the most effective or justified measure. As a result, the objector requested that the 20mph TO be paused until after the proposed traffic calming works are completed and GCC undertakes fresh speed surveys at locations not influenced by traffic calming features. The objector states this would allow for an evidence-led decision on whether a reduced speed limit is required.

- 8.2. In response to the objection, the speed data for Tuffley Avenue was obtained using ATC surveys positioned in locations to capture free-flow conditions, supported by Compass floating-vehicle datasets that validate speeds across the wider extent of Tuffley Avenue. Taken together, these sources provide a reliable representation of existing vehicle speeds, including at points not influenced by junction delays. Although some existing features on Tuffley Avenue are proposed for alteration or removal, the recorded mean speeds of around 24mph are consistent with comparable residential routes, within the Association of Chief of Police Officers enforcement guidelines, and the evidence indicates that vehicle speeds are unlikely to materially increase under the revised design. On this basis, the available data is considered sufficiently robust to inform the assessment of a 20mph speed limit.

Under the Local Authorities' Traffic Orders (Procedure) Regulations 1996, consultation is required once a proposal is sufficiently developed to allow formal advertising. There is no requirement for the associated on-street traffic calming works to be completed in advance of concluding a TO process. It is standard practice across the UK for authorities to make a TO first with associated measures and undertake post-implementation monitoring after. Should monitoring indicate a need for further adjustments, these can be considered at that stage. This approach satisfies statutory obligations and accords with the established traffic order process.

The collision record forms a supportive component of the evidence base. While collisions may have a range of contributory factors, national policy recognises that lower speeds reduce both collision likelihood and severity. The proposed 20mph speed limit is intended to reduce risk across the entire corridor, independent of the contribution of any single feature.

DfT Circular 01/2013 (Setting Local Speed Limits) encourages highway authorities to introduce 20mph speed limits on residential streets with active frontages, pedestrian movements, and identifiable safety concerns, while also allowing for local discretion where conditions are considered appropriate. The mean speeds on Tuffley Avenue fall within the recommended intervention threshold (24mph), and the corridor serves a school community, residential properties, and vulnerable road users. The revised layout, including updated speed cushions and delineator islands, supports the expectations of a 20mph speed limit environment and aligns with the DfT guidance. Therefore, GCC are satisfied that the DfT Circular 01/2013 (Setting Local Speed Limits) has been applied correctly.

In exercising its duties under Section 122 of the Road Traffic Regulation Act 1984, GCC must balance the efficient movement of traffic with the need to ensure safety for all users. The proposed 20mph speed limit achieves a proportionate balance as it enhances safety in a residential area with a history of collisions, supports vulnerable users (particularly school-aged pedestrians), removes features that have generated community concern, and maintains overall network functionality with minimal delay. Therefore, GCC is satisfied that their obligations under Section 122 have been met.

GCC do not consider that undertaking additional speed surveys are a necessary requirement given the existing datasets, the observed traffic behaviour, and the supporting design of the scheme. Monitoring, post-implementation, will be undertaken in alignment with standard practices, and any issues can be addressed through future measures if required. Therefore, the objector's requests are not considered to be required and the introduction of a 20mph speed limit on Tuffley Avenue remains appropriate and proportionate.

- 8.3. The second objection stated that their objection was in relation to the scheme assessment, its evidence base and the consultation process undertaken. The objector states that the TO consultation documents refer to speed data and past collisions as part of the evidence base, but do not explain the rationale behind how the specific measures that have been included within the scheme design were chosen. They questioned whether there was informal engagement with those who drive, walk and cycle up Tuffley Avenue to identify the issues on the street. They also stated that the consultation process was flawed as residents only heard about the scheme via the formal notice erected on-street, outlining the plans. They state this is not consultation as consultees are being presented with a final scheme plan which undermines trust. They state that a proper scheme needs to be designed with community engagement from the start, not based on decisions made away from the locality.
- 8.4. In response to the objection, the 20mph speed limit proposal is evidence led and consistent with national guidance. The mean speeds have been derived from a combination of on street ATCs and anonymised floating vehicle datasets (via GCC's Compass system), providing both point-based spot speeds and wider link level validation of free flow behaviour. ATCs are the Department for Transport's standard for free flow speed analysis and are used nationally for "vehicle speed compliance" statistics, whilst floating vehicle datasets complement ATCs by widening spatial and temporal coverage. The collision history also forms a supportive part of the evidence base. Although collisions may involve a range of contributory factors, national road-safety policy clearly establishes that lower vehicle speeds reduce both the likelihood and severity of injury. The proposed 20mph speed limit is, therefore, intended to reduce risk across the length of Tuffley Avenue, rather than respond solely to the influence of any individual feature. On this basis, GCC consider the available data sufficiently robust to inform the assessment of a 20mph speed limit proposal.

The DfT Circular 01/2013 (Setting Local Speed Limits) advises that speed limits should be evidence led, self-explaining, encourage self-compliance, and be set based upon existing speeds, road function, vulnerable users and the street environment. It also states that traffic authorities have the flexibility to introduce 20 mph speed limits in residential and urban streets where appropriate, as part of a package with other measures to manage vehicle speeds and improve road safety, but should not be set in isolation. Therefore, the scheme aligns with these principles as the recorded mean speeds are within the Association of Chief of Police Officers intervention levels; the route serves residential frontages and pedestrian generators; the speed limit will adjoin the existing 20mph speed limits within the area and features such as signs/road markings/vertical calming (where appropriate) will assist compliance. Therefore, GCC consider that the package of measures associated with the speed limit proposal is appropriate and has been developed following consideration with national guidance and practices.

In response to the comments surrounding consultation, GCC has followed the prescribed Traffic Order consultation procedure in accordance with the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. GCC also had significant informal engagement with residents allowing for the opportunity to inform the proposals prior to the statutory Traffic Order process commencing. GCC has considered the feedback received during this informal engagement and used this to inform the development of the final proposal

(where applicable). Therefore, GCC has gone above the statutory requirements regarding consultation and considers that the level of engagement undertaken has been both comprehensive and proportionate, enabling a fully informed assessment of the proposal.

8.5. The third objection stated that the consultation process was inadequate and exclusionary, arguing that vulnerable or housebound residents were denied the opportunity to participate. They further contend that the proposed traffic-calming features appear arbitrary and unjustified, with no clear evidence base for the selected locations, and criticise the inclusion of a “virtual” speed hump, which they believe will be ignored by drivers. The objector also questioned how a 20mph speed limit will be enforced, expressing scepticism about the effectiveness of vertical deflections and suggested ANPR cameras as a more appropriate alternative. They also stated that existing speed humps generate excessive noise and that the proposed delineator island may worsen this by restricting vehicle positioning. They raise concerns that the revised design may impede driveway access. The objector also argues that if mean speeds are already below 30mph, there is no justification for changing the speed limit, and suggests that many of the recorded collisions stem from previous interventions rather than speeding. They further criticise the illustrative nature of the consultation drawings and the lack of a topographical survey, asserting that this could invalidate the consultation. Overall, the objector questions the evidence base for the proposals and asks the Council to remove what they describe as “haphazard” chicanes, believed to increase risk, noise, and pollution, and instead implement more targeted measures such as parking restrictions, improved visibility, and ANPR-based speed control.

8.6. In response to the objection, the proposal has been advertised in accordance with the statutory requirements set out in the Local Authorities’ Traffic Orders (Procedure) (England and Wales) Regulations 1996. This includes a formal Notice of Intention placed in the press, public display of site notices, and availability of all documents online, as well as on deposit at Shire Hall during the consultation period. Letters were also sent in August 2025 to all properties of Tuffley Avenue about the lower speed limit in GCC’s pre-engagement phase of the scheme. While a letter drop is not required by legislation, wider engagement has taken place prior to the TRO stage, including work with local Councillors and residents’ groups to ensure that information about the forthcoming changes was shared broadly within the community. Therefore, GCC considers that the statutory consultation process undertaken fully complies with all procedural and regulatory requirements.

A key element of the proposed scheme is the removal of the existing build outs, which have generated longstanding concerns from residents regarding noise, conflict between opposing traffic, and acceleration between features. These will be replaced with speed cushions and a delineator island at both existing locations to provide a more consistent and predictable form of traffic calming. The positioning of the proposed cushions and islands has been determined using recorded mean speed data along the corridor, the collision history and the spacing requirements necessary for effective speed management. Additional factors considered include proximity to junctions, bus routes, driveways and pedestrian desire lines, as well as the need to avoid creating new conflict points or placing features too close to side-road junctions or access points. The spacing is, therefore, not arbitrary and it reflects a design approach intended to ensure consistent speed compliance, while maintaining safe operation for all users.

The proposed “virtual” markings are included as a visual reinforcement measure. Their purpose is to strengthen driver awareness of the 20mph speed limit environment, without introducing an excessive number of vertical features along Tuffley Avenue. Consequently, it will help to manage driver behaviour, while limiting noise impacts and minimising inconvenience to residents and bus services.

GCC recognises the limitations of any single form of speed enforcement. However, vertical features remain one of the most effective and reliable methods of achieving meaningful reductions in vehicle speeds and therefore form an essential component of this 20mph road-safety package. DfT Circular 01/2013 (Setting Local Speed Limits) specifically identifies vertical traffic-calming measures as a proven means of creating a self-enforcing 20mph speed limit environment, particularly on residential corridors where mean speeds would otherwise remain above the desired threshold. While technologies such as ANPR cameras can support compliance, enforcement alone does not consistently alter general driver behaviour without supportive changes to the road environment and, therefore, cannot replace the need for engineering measures.

GCC acknowledges that noise from vertical traffic-calming features can lead to concerns from residents. However, the proposed replacement speed cushions and delineator islands have been selected to reduce these impacts. Speed cushions typically generate lower noise levels than full-width humps, as they create less abrupt vertical movement and allow larger vehicles, such as buses and goods vehicles, to pass with minimal suspension impact. The delineator islands will also improve lane discipline, reducing the lateral movement and last-minute positioning currently associated with the priority give-way build outs, which are known sources of noise due to vehicle conflict and aggressive acceleration. By providing a more predictable and consistent vehicle path, the new layout is expected to reduce behaviours that presently generate noise.

In response to the comments regarding driveway access and tracking, all features have been designed to maintain access to private driveways. Vehicle tracking has been undertaken to ensure that vehicles can enter and exit safely in both directions. Additionally, wherever a feature is near to a private access, the spacing has been adjusted to avoid restricting turning radii. Therefore, GCC consider that the proposed features will not have an impact on driveway access and egress and the proposal is appropriate.

In response to the objector's view that a change in speed limit is unnecessary, given the existing vehicle speeds and collision history, the 20mph speed limit proposal is evidence led and fully consistent with national guidance. Mean speeds have been established using both on-street ATCs and anonymised floating-vehicle datasets obtained through GCC's Compass system, providing a combination of point-based spot-speed measurements and wider link-level validation of free-flow behaviour. The collision history also forms a supportive part of the evidence base. Although it is noted collisions may have multiple contributory factors, national road-safety policy consistently demonstrates that lower impact speeds significantly reduce both collision likelihood and severity. Many successful 20mph speed limit schemes are introduced where mean speeds fell within the mid-20mph range, but where vulnerable-road-user activity, residential frontages, school communities or collision history suggest that further risk reduction is appropriate. For these reasons, GCC considers the introduction of a 20mph speed limit on Tuffley Avenue as a proportionate road-safety intervention.

In response to the comments regarding the proposal drawings, these are illustrative and are intended to show the extent and indicative locations of the proposed speed limit and associated traffic-calming features. Illustrative drawings are not a statutory requirement under the Local Authorities' Traffic Orders (Procedure) Regulations 1996 and they are provided to support transparency. The detailed design, including confirmation of levels, drainage, statutory undertakers' apparatus and exact feature positions is completed only after the TO is approved. This is standard and well-established practice for Traffic Orders across the UK and does not invalidate the statutory consultation process undertaken. It would also be

disproportionate and premature to undertake full topographical surveys prior to confirming whether the TO will be made and, therefore, these are correctly scheduled for the post-approval design stage.

Overall, taking into account the removal of the existing priority give-way build outs, the introduction of speed cushions and delineator islands, the existing speed data, the collision history, and the residential character of Tuffley Avenue, the proposed 20mph speed limit and revised traffic-calming measures are considered justified and proportionate. Therefore, these measures are regarded as appropriate for implementation to deliver a more consistent and safer environment for all road users.

- 8.7. The fourth objection stated that the removal of the priority give-way islands on Tuffley Avenue would significantly reduce road safety by eliminating a physical traffic-calming measure that forces drivers to slow down. They state that the proposed measures are passive and can be ignored and subsequently do not create the same impact on vehicle flow. They state that the priority islands moderate speed effectively, are used safely by buses and large vehicles, and do not cause navigability issues. The objector further states that they believe a recent collision appears to be an unstated trigger for the proposal, but that this incident was due to driver error, rather than any failure of the road layout, making the proposed removal a misguided reaction. They also argue that no proper assessment has been carried out on traffic displacement, particularly onto Tuffley Crescent, which already is used as a rat-run and would likely see increased traffic volumes if changes disrupt the flow on Tuffley Avenue. Additionally, the objector states that a comprehensive review of parking restrictions in the wider area is required, as the current parking trends are a primary cause of road safety issues and congestion. The objector concluded that the scheme is incomplete and lacks systematic assessment of the wider impact of the proposals. They also refer to the Road Traffic Regulation Act 1984 being an overarching act with a comprehensive solution being required, and that consultation was inadequate as only residents on Tuffley Avenue were notified despite the wider community impact. As a result, the objector requested that the priority give ways be retained and a holistic study of the wider traffic impacts be undertaken along with a comprehensive review of parking in the area.
- 8.8. In response to the objection, the proposed replacement of the existing priority give-way islands with speed cushions and delineator islands at the two locations in question, would address the specific needs of the site where there has been aggressive driver behaviour. Therefore, GCC are satisfied that the proposal will enhance the current traffic calming features.

In response to the comments that the scheme may be reactionary to a recent collision, GCC has met with Tuffley Avenue residents and local Councillors after the incident and considered any feedback as part of this proposal. However, the scheme is not based on a single event. It forms part of an ongoing, data-led review of road safety in the area, drawing on historical collision data, resident feedback, and routine safety assessments. The recent incident reinforced the importance of this work, but it did not initiate it.

In response to the comments regarding the traffic displacement impact on the wider area, the introduction of a 20mph speed limit with traffic-calming features is unlikely to produce traffic displacement onto adjacent streets. Evidence from comparable schemes indicates that, where vehicle delay is minimal, diversion effects remain negligible. Journey times on Tuffley Avenue under the proposal are expected to remain broadly consistent with current conditions. The scheme has been designed to reduce vehicle speeds while maintaining the strategic function of Tuffley Avenue as a key local distributor road. The proposed measures target driver behaviour, not traffic volume, ensuring the corridor continues to operate effectively

within the wider road network. Therefore, there is no incentive for through-traffic to divert via Tuffley Crescent. However, as per standard practice, post-implementation monitoring will be undertaken to verify traffic behaviour and identify any need for further intervention should unexpected displacement occur.

In response to the comments regarding parking, GCC notes that parking by residents of Tuffley Avenue can contribute to reduced visibility for drivers and pedestrians. However, it also has the effect of narrowing the carriageway, which naturally helps to moderate vehicle speeds. Therefore, a balanced approach is required when determining the level of on-street parking permitted, ensuring that safety, accessibility, and traffic-calming benefits are considered together, rather than in isolation. This approach is consistent with the existing parking management on Tuffley Avenue, where junctions and narrow sections are already subject to waiting restrictions to maintain sightlines and prevent obstruction, while the remaining carriageway is available for residential parking, striking a proportionate balance between maintaining safety standards and preserving on-street parking capacity for local residents.

A comprehensive area-wide review of parking restrictions falls outside the scope of this Traffic Order (TO) scheme, which is focused on managing vehicle speeds, rather than altering parking arrangements. Parking reviews are undertaken through separate processes and under different legislation and typically require a clear and demonstrable level of resident support before changes can be progressed. At present, no such mandate has been identified on Tuffley Avenue, and parking behaviour observed in the area reflects long-standing patterns consistent with residential streets of similar character. Should the objector wish to request a parking review be undertaken, they should speak with their local County Councillor in the first instance, in accordance with GCC policy.

In response to comments suggesting that GCC has not taken a holistic approach, GCC considers that, as evidenced throughout the objection responses above, a comprehensive and integrated approach has been applied to the development of the proposals. The scheme is appropriate and complies with the relevant legislative requirements under the Road Traffic Regulation Act 1984 and The DfT Circular 01/2013 (Setting Local Speed Limits) guidance.

In response to the comments surrounding consultation, GCC has followed the prescribed Traffic Order consultation procedure in accordance with the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. GCC also had significant informal engagement with residents allowing for the opportunity to inform the proposals prior to the statutory Traffic Order process commencing. GCC has considered the feedback received during this informal engagement and used this to inform the development of the final proposal (where applicable). Therefore, GCC has gone above the statutory requirements regarding consultation and considers that the level of engagement undertaken has been both comprehensive and proportionate, enabling a fully informed assessment of the proposal.

In light of the above, GCC does not consider it appropriate to retain the existing priority give-ways or to undertake a wider holistic traffic or parking study, as requested by the objector. The current proposals are deemed to provide a safer and more effective form of speed management, removing conflict points associated with the existing features while maintaining the strategic function of Tuffley Avenue and minimising the risk of traffic displacement. Therefore, these measures are regarded as appropriate for implementation to deliver a more consistent and safer environment for all road users.

- 8.9. The fifth objection stated that although they support the removal of the existing build-outs, which they consider hazardous and obstructive, they strongly object to the proposed 20mph

speed limit. They argue that the speed data used to justify the limit is unrepresentative because it was collected near the build-outs that will be removed, and that average speeds would otherwise be higher. They further contend that collision data has been misinterpreted, noting that recent incidents were linked to the build-outs or the signalised junction rather than excessive speed, and therefore believe the data should be re-analysed or new surveys undertaken once the revised layout is in place. The objector also states that a speed table used as an informal crossing should be removed on safety grounds, citing poor visibility and dangerous conditions for pedestrians. Finally, they argue that the consultation has been insufficiently visible to the wider public, as notices were only placed on lamp posts and unlikely to have been seen by the many non-resident road users who rely on Tuffley Avenue.

- 8.10. In response to the objection, the 20mph speed limit proposal is evidence led and consistent with national guidance. The mean speeds have been derived from a combination of on street ATCs and anonymised floating vehicle datasets (via GCC's Compass system), providing both point-based spot speeds and wider link level validation of free flow behaviour. ATCs are the Department for Transport's standard for free flow speed analysis and are used nationally for "vehicle speed compliance" statistics; floating vehicle datasets complement ATCs by widening spatial and temporal coverage. The three-year collision history also forms an important part of the evidence base. Although collisions may involve a range of contributory factors, national road-safety policy clearly establishes that lower vehicle speeds reduce both the likelihood and severity of injury. The proposed 20mph speed limit is therefore intended to reduce risk across the length of Tuffley Avenue, rather than respond solely to the influence of any individual feature. On this basis, GCC consider the available data sufficiently robust to inform the assessment of a 20mph speed limit.

GCC do not consider that undertaking additional speed surveys are a necessary requirement given the existing datasets, the observed traffic behaviour, and the supporting design of the scheme. Monitoring, post-implementation, will be undertaken in alignment with standard practice, and any issues can be addressed through future measures if required. Therefore, objectors' requests are not considered to be required and the introduction of a 20mph speed limit on Tuffley Avenue remains appropriate and proportionate.

GCC acknowledges the concerns raised regarding the raised table used as an informal crossing. However, this feature forms part of the existing speed-management measures on Tuffley Avenue by creating a vertical deflection that helps moderate vehicle speeds and improve driver awareness. The raised table was delivered under a separate project, and its removal is not within the scope of this scheme, which focuses solely on the introduction of the 20mph speed limit and associated calming measures. Therefore, it will remain in place as part of the current speed-management strategy. GCC will monitor how the feature performs within the revised layout, and should evidence indicate any safety issues, potential adjustments would be considered through the appropriate separate process.

In response to the comments surrounding consultation, GCC has followed the prescribed Traffic Order consultation procedure in accordance with the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. GCC also had significant informal engagement with residents allowing for the opportunity to inform the proposals prior to the statutory Traffic Order process commencing. GCC has considered the feedback received during this informal engagement and used this to inform the development of the final proposal (where applicable). Therefore, GCC has gone above the statutory requirements regarding consultation and considers that the level of engagement undertaken has been both comprehensive and proportionate, enabling a fully informed assessment of the proposal.

8.11. The final objection stated that they had previously raised concerns during the informal engagement about the proposed removal of the build-outs and questioned whether replacement features were necessary if the speed limit was being reduced. They also questioned whether the locations of all calming measures had been properly reviewed. The objector noted that the proposed features comprise speed cushions with delineator islands, which they believe could introduce new issues for residents, including impacts on parking and access, due to the islands being positioned in the centre of the carriageway. They consider the existing build-out locations, particularly near the Wingate entrance and Newark Road, to be inappropriate and do not support the installation of the proposed replacements. The objector further questioned whether the site visit considered the full length of Tuffley Avenue, noting that their section already contains multiple calming features while the lower end has only one feature.

8.12. In response to the objection, GCC acknowledges that the informal engagement raised questions about whether traffic-calming features would still be required once the speed limit was reduced to 20 mph. These comments were considered, and the GCC Traffic Engineering team reviewed both the need for, and positioning of, features as part of developing the current proposals. In accordance with DfT Circular 01/2013 (Setting Local Speed Limits), physical measures may be necessary in locations where a reduced limit alone is unlikely to achieve appropriate speed compliance, and this has informed the scheme design. GCC has also received support for the proposal from Gloucestershire Constabulary (as the enforcement body), who highlighted that existing vehicle speeds are already generally consistent with a 20mph environment. On this basis, the police consider the reduced limit to be effectively self-enforcing, with the proposed features providing additional consistency rather than relying on active enforcement. The existing build-outs are, therefore, being removed and replaced with speed cushions and a small delineator island, a configuration selected to reduce conflict and noise while maintaining the level of speed control required to support the 20mph speed limit environment. The proposed delineator islands are significantly smaller and less intrusive than the previous build-outs and do not create the same issues with vehicle conflict, noise or manoeuvring. The delineator islands do not restrict driveway access or materially affect on-street parking compared with the current situation, given their purpose is to provide central guidance for vehicles, improving alignment and reducing the swerving behaviour associated with the existing priority give-way build outs.

The length of Tuffley Avenue was assessed as part of the redesign, taking account of junction spacing, access needs, driveway positions, bus tracking, pedestrian activity and collision history. The differing number of interventions along sections of Tuffley Avenue reflects these varying characteristics, including higher turning movements and school-related pedestrian activity near Wingate. Therefore, GCC consider the proposals to be proportionate, and back an evidence-based speed management regime that is consistent with national guidance.

9. Equality Impact Assessment

GCC has had due regard to the 3 aims of the general equality duty under the Equalities Act 2010 in relation to the 9 groups (Age, Disability, Sex, Race, Gender reassignment, Marriage and Civil partnership, Pregnancy & Maternity, Religion and/or Belief and Sexual orientation, along with other groups (such as long term unemployed, socio-economical deprived groups, community cohesion, human rights)) with protected characteristics and its decision to make this TO permanent does not adversely affect any of the groups with those protected characteristics (please see Due Regard Statement in Appendix E).

10. Summary

- 10.1. The proposal is to introduce a 20mph speed limit onto Tuffley Avenue for its entire length. It is also proposed to introduce/remove some traffic calming features.
- 10.2. This scheme is being proposed following a review of the existing speed limit and traffic calming measures along Tuffley Avenue. The proposed 20mph speed limit seeks to improve road safety and amenity for all highway users, including pedestrians (particularly school children attending Calton Primary School) and cyclists, as well as improving the consistency of the speed limit with the surrounding area.
- 10.3. 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. Collision data also demonstrates there have been 11 personal injury collisions on this section of road in the last 3 years.
- 10.4. In addition to the proposed 20 mph speed limit, GCC's Traffic Engineering Team is planning a series of complementary traffic-calming measures to reinforce the reduction in vehicle speeds and enhance overall road safety. The proposal includes replacing the existing priority give-way features on Tuffley Avenue with speed cushions paired with delineator islands. These physical interventions are designed to create a vertical deflection that encourages drivers to slow down while maintaining accessibility for larger vehicles such as buses and emergency services.
- 10.5. Furthermore, the scheme introduces virtual speed cushions, which are high-visibility road markings that mimic the appearance of physical cushions. These are particularly effective in areas where installing full-height cushions may not be feasible, yet visual cues can still influence driver behaviour. By combining physical and virtual calming features, the approach aims to deliver a consistent message to drivers, reinforcing the need to adhere to the lower speed limit
- 10.6. 6 objections were received during the Notice of Proposal (Public Consultation) process from members of the public with regards to the proposed restrictions.
- 10.7. All objections have been outlined and responded to within this report in Section 8 in alignment with GCC's duty under the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996.
- 10.8. In considering the assessment under Section 122 of the Road Traffic Regulation Act 1984, the proposed TO and introduction of the traffic calming features meets GCC's obligations in that they would ensure the expeditious, convenient, and safe movement of vehicular and other traffic, manage their road network and to improve road safety.

11. View of the Case Officer

- 11.1. This report demonstrates that the introduction of the proposed 20mph Speed Limit and traffic calming features is consistent with DfT "Setting Local Speed Limits" National Guidance and has been fully consulted upon in accordance with GCC procedures and followed necessary statutory procedures, as set out in the Local Authorities' Traffic Orders (Procedure) (England & Wales) Regulations 1996.

- 11.2. 6 objections to the introduction of proposals were raised during the Notice of Proposal (Public Consultation) process. However, for the reasons outlined in Section 8 it is considered that the proposal should progress on to be made as advertised.
- 11.3. The proposal (as shown in Appendix A) has been designed, taking into account the range of representations received, but also balancing this with GCC's duties under Sections 84 and 122 of the Road Traffic Regulation Act 1984, the Department for Transport Setting Local Speed Limits criteria and Sections 90A–90F and Section 90G of the Highways Act 1980 (as amended).
- 11.4. It is considered that the speed limit proposed meets GCC's objectives and therefore, it would be beneficial that the TO be made as advertised in January/February 2026 and the traffic calming features progress to construction.

12. Recommendation by the Senior Case Officer


- 12.1. I am satisfied that the TO and traffic calming features have been correctly advertised and consulted upon in accordance with the Road Traffic Regulation Act 1984, the Highways Act 1980 (as amended) and the procedures laid down in these Acts.
- 12.2. The necessary statutory procedures as set out in the Local Authorities' Traffic Orders (Procedure) (England & Wales) Regulations 1996 have been followed, and guidance, including the DfT Setting Local Speed Limits Guidance and Traffic Signs Regulations and General Directions 2016 have been considered.
- 12.3. Although 6 objections to the TO were received, I am satisfied that these have been duly considered and that a balance has been drawn between the objections, positive feedback and safety of all road users.
- 12.4. After considering all background information, representations and data supplied in this report, I recommend that the formal objections are considered as minor in nature.
- 12.5. I recommend that the TO is made permanent as originally advertised in January/February 2026 and the traffic calming features progressed to construction, under delegated authority.

13. Decision by the Traffic and Active Travel Manager

13.1. I have considered the report, recommendations and whether to hold a Traffic Regulation Committee. I have also considered the representations that we received in relation to this matter in making my decision. I have decided that Gloucestershire County Council should:

- Make the TO as advertised in January/February 2026; and
- Progress to construction of the traffic calming features.

13.2 As a result of the above I give authorisation for the Assistant Director of Legal Services to act on my decision pursuant to delegations approved in accordance with the Local Government Act 1972 and subsequent legislation.

Signed: 

Nathaniel Davis – Traffic & Active Travel Manager

Date: 10/06/2026

Appendices

Appendix A – Proposal plan for TO and associated traffic calming

Appendix B – Traffic Data (Speed Survey & Collision History)

Appendix C – Draft Legal Documents for TO and associated traffic calming

Appendix D – Objections and representation received during the Statutory and Notice of Proposal Public Consultation

Appendix E – Statement of Due Regard