



TAVISTOCK ROAD

1. INTRODUCTION

This report seeks delegated authority to implement amendments to The City of Plymouth (Moving & Speed Traffic Regulation Orders) (Consolidation) Order 2014 (as amended) in association with the Tavistock Road TRO.

2. TRAFFIC REGULATION ORDERS REQUIRED

2.1 The elements that need a Traffic Regulation Order are as follows:

To Add;

30mph Maximum Speed Limit

- i. Tavistock Road, from a point 197 metres north east of its junction with Sendall's Way to a point 240 metres north east of its junction with Powisland Drive. In a north easterly direction only.
- ii. Tavistock Road, from a point 90 metres south west of its junction with Charlton Road to a point 240 metres north east of its junction with Powisland Drive, In a south westerly direction only.

SCHEDULE OF REVOCATIONS

40 MPH Maximum Speed Limit

- i. Tavistock Road, from a point 197 metres north east of its junction with Sendall's Way to a point 240 metres north east of its junction with Powisland Drive. In a north easterly direction only.
- ii. Tavistock Road, from a point 90 metres south west of its junction with Charlton Road to a point 240 metres north east of its junction with Powisland Drive, In a south westerly direction only.

3. STATUTORY CONSULTATION

Proposals

The proposals for the Tavistock Road TRO were advertised on street, in the Herald and on the Plymouth City Council website on 12th November 2021. Details of the proposals were sent to the Councillors representing the affected wards and statutory consultees on 08th November 2021.

There have been 15 representations received relating to the Traffic Regulation Order proposals as below:

A Standard response has been sent to each respondent. In addition and to avoid repetition a general commentary addressing the majority of the points raised is

appended at the end of this submission. Individual comments not covered in the general response are indicated to the right of each submission where appropriate.

Standard Response sent:

Thank you for your recent comments towards the proposals – 2021.2137270.

Your comments have been logged on our records and will be considered as part of the final decision making process. At the end of the consultation period, a report will be prepared summarising any concerns that have been raised and making recommendations. In line with the statutory process, the decision on whether or not to proceed with these proposals will be made by the Cabinet Member for Transport.

You will be notified if and when the proposals will be implemented.

Consultation	Comments
<p>I regularly use this stretch of road, as I work at Mount Gould Hospital, on my bicycle currently 6 times a week. It is already quite scary when cycling through, buses and lorries rarely give me enough room and increased speed will make my bike even more unstable.</p> <p>We are all supposed to be getting healthier and more environmental as a Nation. Putting the speed limit up to 40mph will make this stretch of road even more dangerous for me and will prevent encouraging more individuals out of their vehicles and onto bikes.</p> <p>Please, for the safety of me and others on our bikes, please do not put the speed limit up.</p>	<p>Standard response sent:</p>
<p>After reading the NOTICE OF PROPOSED ORDER THE CITY OF PLYMOUTH (MOVING & SPEED TRAFFIC REGULATION ORDERS) (AMENDMENT ORDER No. 2021.2137270 – TAVISTOCK ROAD) ORDER I found a number of interesting and missed valid points to support my argument why the speed limit should not be increased from 30MPH to 40 MPH.</p> <ul style="list-style-type: none"> The proposed 40 MPH around the Manadon roundabout itself is pointless given all of its junctions are light controlled. <p>The following I found while navigating the following areas are what I would call pinch points and potentially RTCs in which travelling at 40 MPH would potentially greatly increase the probability of such events and although you mention that overall collision rates have not reduced in 3 years, the nation average has been falling for</p>	<p>Standard response sent:</p> <ul style="list-style-type: none"> Additional response :- Opinion noted : The 40mph Limit on Manadon Roundabout is already in place and links to the A38 Slip Roads

the past three years and we have been through a pandemic with traffic almost to non-existent levels so I am surprised a reduction in collisions is not reflected in some form in your statement and I would gladly be informed where your information can be found to support your statement.

Northbound:

- Manadon roundabout on-ramp to Tavistock Road
- Cars proceeding into right hand lane to turn right for Charlton Road (when finished) and William Prance Road
- 360 metres to Boniface lane exit light controlled
- 55 Metres to Meavy Way Off-Ramp
- 70 Metres Meavy Way On-ramp
- 80 Metres to Bus stop
- 160 Metres to Budshead Way Off-Ramp
- 177Metres to Budshead Way On-Ramp
- 193 Metres to proposed Charlton Road junction Light controlled and 230 Metres to Off-Ramp to McDonalds Junction
- 60 Metres to Car Wash Off-Ramp
- 100 Metres to car wash On-Ramp
- 55 Metres to B&Q junction Light controlled
- 240 Metres to end of proposed 40 MPH

As you may well know there are many points of On/ Off Ramps, light controlled junctions on Tavistock road Northbound with an average of 148 Metres between junctions/Ramps so increasing the speed limit to 40 MPH is not going to enhance speed at all, indeed all that will happen is you arrive at the next set of lights 2 seconds quicker while at the same time pumping out a lot more CO2 than if you did it at 30 MPH and given that COP26 has just finished I would have thought this would be high on the list of councils priority's. The points I have mentioned above is for the northbound but equally the same in principle would apply southbound from the point on Tavistock Road 90 metres south west of its junction with Charlton Road with numerous On/Off Ramps and light controlled junctions.

<p><u>Pedestrians.</u></p> <p>I have walked along Tavistock road when it was 40 MPH while Buses, very large articulated lorry's have passed me only metres away and I can assure you that it is not a pleasant experience. No safety barrier to protect the pedestrian and the problem for cyclist I imagine is even more frightening.</p> <p><u>Residents</u></p> <p>I know a family who live on Tavistock and they would like it to remain at 30 MPH as it would certainly cut down on the pollution as they have an asthmatic young boy and living right on the edge of the road the reduction in noise is certainly welcomed and I'm sure they too would feel safer pulling out on to a 30 MPH Tavistock Road rather than a Tavistock Road running at 40 MPH.</p> <p>Has anyone asked the residents of Tavistock Road what they think?</p> <p>So for the sake of a journey taking a few seconds longer Tavistock road would feel safer, Cleaner and quieter and save the planet just that little bit more.</p>	
<p>I am writing in regard to the proposed change from 30mph to 40mph speed limit on Tavistock Road. I am writing in support of this change. I have seen more near misses since the limit was reduced to 30mph than before and the traffic flows worse than before at 30mph</p>	<p>Standard response sent:</p>
<p>A Traffic Regulation Order has been submitted by PCC to increase the speed limit to 40mph on sections of Tavistock Road. The current Temporary 30mph Speed Limit was introduced on Tavistock Rd to facilitate the Derriford Transport Scheme.</p> <p><u>We understand that this was pledge 66 in the Conservative election manifesto, but ask councillors and other parties listed in the consultation to consider these points:</u></p> <ul style="list-style-type: none"> • What evidence supports this proposal? Has modelling shown that a partial 40mph speed limit will either speed up or even slow traffic flows? There are now many reports available from around the world which counter the claim that 	<p>Standard response sent:</p>

<p>increased speed increases traffic flow.</p> <ul style="list-style-type: none"> • Since the introduction of the 30mph limit three years ago traffic flow has increased notably and attitudes to speed and road safety have changed. • Sections of this route have unsegregated cycle lanes adjacent to the traffic. Government reports and directives specify the segregation required between traffic at various speeds/ densities and cycle tracks or on road cycle lanes: The DfT Gear Change report 2020, which Plymouth CC has endorsed specifies that ‘cyclists must be physically separated and protected from high volume motor traffic, both at junctions and on the stretches of road between them’ Local Transport Note LTN 1/20 - Fig 4.1 is a table showing that an unsegregated cycle lane adjacent to 40mph traffic ‘will exclude most potential users and /or have safety concerns’ • Plymouth CC has signed up to Climate Emergency measures and pledged to make Plymouth carbon neutral by 2030. Increasing speed limits in built up areas is likely to increase emissions. <p>The Plymouth Cycling Campaign argues that increasing this speed limit would be a retrograde and potentially dangerous act, as well as a waste of public finances. Are the responses to this amendment made public?</p>	
<p>I wish to object to the proposed maximum speed increase for Tavistock Rd contained in the Traffic Order Amendment 2021.2137270. There are 4 main parts to my objection:</p> <ol style="list-style-type: none"> 1. Increasing the maximum speed on Tavistock Rd to 40 mph goes against PCC's own Climate Emergency Declaration as increasing the speed limit on the road will undoubtedly result in higher CO2 emissions from vehicles. 	<p>Standard response sent:</p>

<p>2. It goes against the Council's own policy. Plymouth City Council's Local Transport Plan states that it is 'seeking to reduce the impact of severance caused by transport networks, enabling more journeys by walking, cycling and public transport and providing genuine alternative ways to travel from home to work and other facilities.' I fail to see how increasing traffic speeds on a section of road that has unsegregated cycle lanes can possibly help achieve this.</p> <p>3. Vehicles regularly travel along Embankment Rd at speeds in excess of 40mph. The same will happen on Tavistock Rd. Speeding traffic in an urban setting is a major cause of pollution as well as increasing the risk of serious crashes, with negative impacts for local communities separated by the road and vulnerable road users.</p> <p>4. A vehicle travelling at 40mph will cover the distance between the Derriford roundabout and Manadon flyover only 1 minute quicker than a vehicle travelling at 30mph. This time gain even in a best-case scenario is minimal and does in no way outweigh the negative impacts.</p> <p>My final thought is that those who seek to bring about this change should experience what it feels like for a cycle rider to have cars close pass at 40mph before they proceed. I would be happy to accompany them.</p>	
<p>I just wanted to say the road should be put back to 40mph I drive that road to and from the hospital (I work there) and I use a speed limiter on my car to make sure I don't speed. Let's me honest most people do speed. As someone who doesn't, I drive at 30 and I can tell you it's probably more likely to cause an accident as people get so annoyed at me being 'slow' that they cut me up, undertake me or drive right up my arse!</p> <p>Please put it is back to 40 so I can actually drive at a sensible speed without fear of breaking the law!</p>	<p>Standard response sent:</p>
<p>I agree with the re introduction of the 40mph speed limit on the Tavistock Road section.</p>	<p>Standard response sent as above:</p> <p>Additional response :- The A38 Parkway is a Trunk Road administered by National Highways on behalf of the</p>

<p>However with now so many accidents on the Parkway should a 50mph or max 60mph be introduced. I recently have driven in Wales where there is a 50mph on motorways for environmental reasons. Surely environmental and safety should be addressed as the parkway actually goes through the centre of our city.</p>	<p>Department for Transport. Any comments regarding Trunk roads should be addressed to National Highways.</p>
<p>As a resident of Tavistock road I wanted to raise my concerns about the speed limit of the speed camera out side my house city bound. I wanted to confirm that the speed limit outside my house and that of the speed camera will still be set at 30mph as the area is classed as residential.</p> <p>The only thing stopping motorists from exceeding the speed limit along that stretch is that camera.</p> <p>The 30mph limit on the camera enables cars for that small stretch of houses to safely park there cars by using the buss lane. I fear a faster limit will be very dangerous to these home owners. As a family with 2 small children the 30mph camera also gives a slight piece of mind when walking down the road.</p> <p>I would be most appreciative if you could confirm this to me.</p>	<p>Standard response sent :</p> <p>Additional response :- The speed limit will be extended to cover the houses on Tavistock Rd immediately to the south of the Charlton Rd junction. The Limit and signals will be camera enforced at this location.</p>
<p>I understand there are plans to increase the speed limit on Tavistock Road to 40mph.</p> <p>I am concerned that this will increase pollution and the risk of serious accident to other road users, particularly pedestrians and cyclists.</p> <p>At a time where environmental impact is a key issue, this plan seems a significant retrograde step, and will endanger lives.</p>	<p>Standard response sent as above</p>
<p>I was surprised to read in the Herald last week that the speed limit on Tavistock Road is going to be increased to 40mph. The national speed limit of 30mph applies to all single and dual carriageways with streetlights in the UK for very good safety reasons, in order to protect all road users. I cycle this route from Stoke to Derriford daily and I have to say that it is very scary to be overtaken by speeding vehicles. My husband has been driving this route for 20 years and has seen ambulances picking up cyclists several times at the Crownhill flyover junction. How many people have to be seriously injured or killed for the council to take notice of cyclists and pedestrians? Why</p>	<p>Standard response sent:</p>

<p>aren't you encouraging people who are trying to use environmentally friendly transport? I feel that the council simply don't care that cyclists are being seriously injured on our roads and, quite incredibly, want to encourage speeding motorists who are putting us all at risk. I have to say that the majority of motorists in Plymouth have been very kind to me as a cyclist. They even on occasion will actually use their vehicle to block the traffic so that I can safely cross the 'junctions of death' at Crownhill. On the other hand, I have had some people, who seem to think that they are in a race when they are behind the wheel, speed past me on the downhill section before the flyover and then shoot across in front of me down the off ramp to the roundabout in an absolutely terrifying fashion. You do kind of get used to the danger after a few months of cycling the route, but to hear that the council actually endorse this behaviour, which I would class as dangerous driving, is so awful. Honestly, if you want to encourage more people to cycle around Plymouth, it's not rocket science, you simply have to make it more attractive than driving. Currently it feels like a battle to cycle instead of drive because the city is so car-centric.</p> <p>Please help the cycling commuters on the route to Derriford and rethink this step to increase the speed limit. This is such a busy road and is just the kind of route where we need to encourage more people out of their cars and onto other forms of transport to help relieve congestion and save the planet.</p>	
<p>I'd like the following comments to be considered in relation to the proposal to change the speed limit on parts of Tavistock Road from 30mph to 40mph (Amd 2021.21 37270 Tavistock Road).</p> <ol style="list-style-type: none"> I. An increase in speed limit does not consider the needs of vulnerable road users. Data shows that the risk of death for a pedestrian hit by a car at 30-40mph is between 3.5 and 5.5 times more likely than for a pedestrian hit by a car at 30mph (ROSPA, 2018 Inappropriate Speed factsheet February 2017 (rospa.com)). It is reasonable to assume that there would be a similar large increase in risk to people on bikes and as this route is part of Plymouth's Strategic Cycle Network 	<p>Standard response sent:</p>

<p>an increase from the current speed limit would endanger more people who ride a bike along this route which is the main north - south link in Plymouth.</p> <p>2. Changing the speed limit to 40mph for parts of the route will mean there is no longer a consistent speed limit in place which is likely to add to confusion for drivers and a greater risk of accidents as drivers react to inconsistent limits. This is even more so given that the speed limits will be different inbound and outbound on some sections of the route.</p> <p>I am opposed to any increase in the speed limit.</p>	
<p>I would like to raise my objection to the restoration of the 40mph speed limits along Tavistock Rd.</p> <p>Given the cycling infrastructure along the proposed route varies substantially, it is very poor in areas and partly relies on non-segregated cycle lanes, a 40mph speed limit would seem to be against the Governments own guidelines on cycling infrastructure (cycle-infrastructure-design-ltn-1-20) which indicates that this would “exclude most potential users and / or have safety concerns”.</p> <p>The traffic is generally congested along here and given the number of side roads, slip roads, roundabouts, traffic lights and other hazards etc, raising the limits seems pointless and will only create a speed up / slow down issue, increasing emissions accordingly.</p> <p>Increasing the speed limit by 10mph will yield very little gain in journey times and so be fairly pointless in relation to the downsides.</p> <p>I note that the TRO it states, “Overall collision rates have not reduced in the 3 years the lower speed limit has been in operation compared with the 3 years prior to introduction”. However, the online newsletter regarding the extension states “Recorded collisions before and after the introduction of the Derriford Transport Scheme are at similar levels but there has been a significant reduction in the number that are speed-related”. Which seems slightly at odds with the previous statement?</p>	

<p>I've recently been made aware of the plan to increase the speed limit on Tavistock Road from 30mph back to 40mph. I would ask that you seriously reconsider keeping the 30mph speed limit on the stretch between Manadon roundabout and Derriford Hospital. The reason why we have so much congestion is because of the amount of traffic we have. To reduce traffic, we need to encourage active travel methods (e.g. cycling) or bus use. Derriford Hospital is applying for one of the new Plymouth mobility hubs and also wants to increase the proportion of staff cycling to work. However, the current PCC new proposed cycle routes do not include a separate cycle lane from the city centre to Derriford Hospital. I know colleagues at Derriford who don't cycle to work precisely because they find Tavistock Road dangerous to cycle on. If Tavistock road from Manadon roundabout to Derriford goes back up to 40mph, this further discourages people from cycling to work. Less cyclists, more cars, more congestion. This will also have a knock on effect of reducing reliance on personal car use for shorter journeys that could otherwise be done by bicycle.</p> <p>Sustainable behaviour will only occur when the infrastructure is there to support it. I hope that PCC and Street Services see the essential role that they play in that, and use their influence to the benefit of Plymouth, its people and the environment.</p>	<p>Standard response sent:</p>
<p>I am appalled to hear of these plan to increase the speed limit to 40 mph. At a time when we need to be encouraging more active travel, eg cycling, because of the climate emergency, this will make a dangerous section of road even worse and may put people off transitioning away from fossil fuelled travel. I cycle to and from work at Derriford hospital, and this road already feels unsafe with close passing, even with a 30mph limit. Raising the limit will make any accidents more likely to be fatal.</p> <p>With regard to the comment that overall collision rates have not fallen over the last 3 years, it may well be that the lockdowns and changes to working practice reduced journeys so this time period may not be representative.</p> <p>It really is about time that consideration was give to all residents and road users, not just those who wish to travel at speed and pollute the city while they do so.</p>	<p>Standard response sent:</p>

<p>I sincerely hope you will reconsider before a serious accident occurs. Saving a few seconds on a car journey is not worth it.</p>	
<p>I note that a new Traffic Regulation Order has been submitted by PCC to increase the speed limit to 40mph on sections of Tavistock Road A386.</p> <p>I would like to know if this change follows government guidance and what traffic flow modelling was carried out, with what results?</p> <p>As I am sure you are aware, experience from cities worldwide proves that vulnerable road users are more likely to suffer serious or fatal injuries at 40 mph than 30 mph. Is there a plan to re-route cycle paths away from the road at all points where the 40 mph limit is in force?</p> <p>Overall, there does not seem to be a logical division of roads in Plymouth into different limits and it would be good to know what criteria are employed when deciding how to classify a road.</p>	<p>Standard response sent:</p>

Officer Comment in response to representations received and shown above.

The current 30mph Speed Limit on Tavistock Rd was introduced temporarily in 2017 to assist in the construction of the Derriford Transport Scheme and later extended in the knowledge that the Charlton Rd Traffic Signals would also require a temporary 30mph Limit and potentially require a permanent drop in speed limit locally. However, the current permanent Speed Limit on the A386 Tavistock Rd remains 40mph and the Temporary limit is due to expire next spring and cannot be further extended.

Rather than simply revert back to 40mph, a study of the effects of the temporary limit and of the changes in the road network has been undertaken and it is apparent that speeds to the north of Derriford Roundabout are consistent with 30mph and the section between Runway Road and Derriford Roundabout will therefore become 30mph by permanent Traffic Order. To the south of Derriford Roundabout the Traffic Order will extend the 30mph section to the south of Charlton Rd junction.

The National Speed Limit of 30mph only applies to Dual Carriageways with Street Lighting if no Traffic Order increasing the Limit is in place. Examples in Plymouth where urban street lit dual carriageways are subject to higher speed limits are Embankment Rd, St Budeaux Bypass and Tavistock Rd north of the Woolwell Roundabout. Urban Dual Carriageways are invariably lit and have higher speed limits.

The section of Temporary 30mph which will revert back to 40mph is Urban Dual carriageway and the relatively small number of domestic dwellings along its length are either set back laterally or vertically from the carriageway and segregated by wide verges and/or footpath. Since the temporary speed reduction has operated, speed monitoring has shown that speeds at the busiest times of the day have been consistent with the posted speed limit. However, when traffic volumes are lower, drivers revert to the speed they feel to be reasonable for the road conditions which are more consistent with a 40mph speed limit. The signal installations along the route are linked and will optimise in response to lower or higher speeds. There is therefore unlikely to be any

significant Carbon tariff to the change, merely an acceptance that drivers can continue to drive safely at a slightly higher speed on a high quality road without the risk of prosecution.

Casualty collision rates have fallen through the pandemic and traffic volumes on the A386 dropped to approx. 1/3 of pre pandemic levels at one point. For that reason a comparison was made which excluded figures from the beginning of the pandemic. A study of Injury Traffic Collisions on the sections of road to be returned to 40mph prior to and post implementation of the scheme has found that overall collision rates have not reduced in the period that the lower speed limit has been in operation. As only 18 months of Collision data was available post implementation prior to the 2020 lockdown this data was compared with both 3 years and 18 months of pre scheme data. The comparison showed no statistically significant difference either in overall collisions rates, involvement of inappropriate speed or those involving cyclists.

Speed Limits work best when there is a consensus between road users over the correct speed at which to travel. Where a significant proportion of road users feel that the speed limit is too low and ignore its provision the differential in speed between both populations of drivers can lead to increased collisions. Vulnerable road users have to make allowance for this speed differential and can be more vulnerable as a result.

The A386 Dual Carriageway is one of the City's major transport arteries linking population and business areas to the A38 and City Centre and the changes ensure that the speed limit is consistent with the road's function and takes account of safety concerns where appropriate.

Department for Transport Local Transport Note 1/20 gives advice on appropriate speed limits to encourage and protect cyclists. Table 4.1 (reproduced) below) does not distinguish between 40mph Speed Limits on Single and Dual Carriageway roads. However, the notes to the table (point 1.) do recommend that where the speed at which 85% of drivers travel at or below exceeds 10% above the speed limit then the next highest speed limit should be used. As 85thile speeds are known to be in the region of 35mph, the appropriate speed limit recommended in the guidance would be 40mph.

Figure 4.1: Appropriate protection from motor traffic on highways

Speed Limit ¹	Motor Traffic Flow (pcu/24 hour) ²	Protected Space for Cycling			Cycle Lane (mandatory/ advisory)	Mixed Traffic
		Fully Kerbed Cycle Track	Stepped Cycle Track	Light Segregation		
20 mph ³	0	Green	Green	Green	Green	Green
	2000	Green	Green	Green	Green	Green
	4000	Green	Green	Green	Yellow	Yellow
	6000+	Green	Green	Green	Yellow	Yellow
30 mph	0	Green	Green	Green	Yellow	Yellow
	2000	Green	Green	Green	Yellow	Yellow
	4000	Green	Green	Green	Yellow	Pink
	6000+	Green	Green	Green	Yellow	Pink
40 mph	Any	Green	Yellow	Yellow	Pink	Pink
50+ mph	Any	Green	Pink	Pink	Pink	Pink

Provision suitable for most people

Provision not suitable for all people and will exclude some potential users and/or have safety concerns

Provision suitable for few people and will exclude most potential users and/or have safety concerns

Notes:

1. If the 85th percentile speed is more than 10% above the speed limit the next highest speed limit should be applied
2. The recommended provision assumes that the peak hour motor traffic flow is no more than 10% of the 24 hour flow
3. In rural areas achieving speeds of 20mph may be difficult, and so shared routes with speeds of up to 30mph will be generally acceptable with motor vehicle flows of up to 1,000 pcu per day

4. RECOMMENDATION

After reviewing all comments received, our recommendations are below:

That the changes to the Speed Limit are introduced as advertised.

5. LEGAL CONSIDERATIONS

The lawful implications and consequences of the proposal have been considered and taken into account in the preparation of this report.

When considering whether to make a traffic order it is the Council's responsibility to ensure that all relevant legislation is complied with. This includes Section 122 of the Road Traffic Regulation Act 1984 (as amended) that sets out that it is the duty of a local authority, so far as practicable subject to certain matters, to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway. It is considered that the proposals comply with Section 122 of the Act as they practically secure the safe and expeditious movement of traffic in and around Plymouth and provide for suitable and adequate associated parking facilities.