



MILL BRIDGE

I. INTRODUCTION

This report seeks delegated authority to implement amendments to The City of Plymouth (Traffic Regulation and Street Parking Places) (Consolidation) Order 2004 & The City of Plymouth (Traffic Movement and Speed Limit Regulations) (Consolidation) Order 2022 in association with the Mill Bridge Scheme.

We are grateful to all people that have taken the time to respond to this consultation.

2. TRAFFIC REGULATION ORDERS REQUIRED

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

20mph Zone on the following streets:

Adelaide Lane, Adelaide Place, Adelaide Street Ope, Alice Lane, Alice Street, Anstis Street, Archer Place, Archer Terrace, Arundel Crescent, Ashley Place, Battery Street, Bayswater Road, Belmont Street, Boon's Place, Cambridge Lane West, Cathedral Street, Cecil Cotts, Cecil Street, Claremont Street, Clarence Place, Crawford Road, Dairy Lane, De La Hay Avenue, Downton Close, Edgcombe Avenue, Eldad Hill, Essex Street, Eton Avenue, Eton Place, Eton Street, Fellowes Place, Fellowes Place Lane South, Fellows Lane, Fitzroy Road, Flora Cottages, Flora Court, Flora Street, Francis Street, Frederick Street East, Frederick Street West, Gloucester Place, Halfpenny Court, Harwell Street, Hastings Street, Hastings Terrace, Haystone Place, Hetling Close, High Street, Hotham Place, Ilbert Street, King Street, Manor Gardens, Manor Street, Melbourne Cottages, Melbourne Place, Melbourne Street, Mill Bridge, Molesworth Road, Neswick Street, North Road West, Ocean City Place, Octagon Street, Oxford Place, Oxford Street, Palmerston Street, Paradise Road, Patna Place, Peel Street, Penrose Street, Penrose Street West, Prynne Close, Quarry Cotts, Queen's Gate, Rendle Street, Rutger Place, St Barnabas Terrace, St Mary Street, Staddon Terrace Lane, Stoke Road, Stuart Road, Sydney Street, Union Place, Valletort Lane, Valletort Place, Valletort Road, Victoria Avenue, Wantage Gardens, Waterloo Close, Well Gardens, Wilton Road, Wilton Street, Wingfield Way, Wolsdon Place, Wolsdon Street, Wyndham Lane, Wyndham Mews, Wyndham Square, Wyndham Street East

No Waiting At Any Time

- (i) Edgcombe Avenue, both sides from its junction with Mill Bridge for a distance of 10 metres in a westerly direction
- (ii) Hotham Place, both sides from its junction with Mill Bridge for a distance of 10 metres in an easterly direction

No Loading/Unloading Mon-Sat 8am-9.15am and 3.45pm-6pm

- (i) Eldad Hill, the north side from a point 105 metres south-east from its junction with Hotham Place to its junction with North Road West
- (ii) Eldad Hill, the south side from a point 100 metres south-east from its junction with Edgcombe Avenue to its junction with North Road West

REVOCATIONS

No Loading/Unloading Mon-Sat 8am-9.15am and 3.45pm-6pm

Stoke Road, both sides, from the junction with Polruan Terrace to the junction with North Road West

The proposal also included advertisement of a Parallel Crossing on Mill Bridge, approx. 76.5 metres south east of its junction with Edgcumbe Avenue.

3. STATUTORY CONSULTATION

Proposals

The proposals for the Mill Bridge Scheme were advertised on street, in the Herald and on the Plymouth City Council website on 12 July 2024. Details of the proposals were sent to the Councillors representing the affected wards and statutory consultees on 8 July 2024.

There have been a total of 362 representations received relating to the proposals 166 were in favour of the proposals with 163 against. There were a further 33 responses which were interpreted as either supporting the proposals in part or were raising issues not covered by the consultation. A strong theme amongst those in favour of the scheme was for it to be extended to surrounding areas or across the City. (35/166). Particular views held by those against the proposals included that the proposals are designed to raise money (36/163), should be confined to areas around schools (25/163) and drawing attention to the recent 20mph National Speed limit introduced in Wales (32/163)

Although not requested as part of the consultation, a proportion of respondents indicated whether or not they lived in the area of the proposals. Of the 166 responses in favour, 82 identified as being residents within the area of the proposals. Of the 163 against, 21 identified as being residents within the area of the proposals. Of the 33 additional responses that did not give a clear view on the proposals, 12 identified as being residents from within the area of the proposals. A list of the issues raised by respondents is detailed below along with Officer comment:

In addition, the City Council have been made aware of a Change.org petition against the introduction of 20mph Zones in Plymouth which has garnered over 2200 signatures at the time of writing this report. The petition has not been officially handed in so no analysis of where the signatories live can be made and it does not form a part of the statutory consultation. However, the reasons given in the supporting text are all replicated below along with appropriate Officer responses.

The Police have responded in favour of introducing the scheme and the comments of the Police Road Casualty Reduction Officer are reproduced below.

There are more formal consultation responses in favour of proceeding than against. A budget from Active Travel England, administered by Sustrans, is available to construct the scheme if it can be completed on program before 31/03/2025.

Comments Against	Officer Comments

<ul style="list-style-type: none"> • 20mph is too slow, • Cyclists and E-bikes will overtake you • It is hazardous travelling at such a low speed with people checking their speedometers rather than concentrating on the road • Speed controls and cushions slow down Ambulances • Will cause congestion and traffic will move to other routes. People will have to get up much earlier to go to work. Motorists will spend more on fuel and the cameras may be vandalised. 	<ul style="list-style-type: none"> • 20mph is a speed suitable in residential areas which allows Pedestrians and other vulnerable road users to interact with the road safely without unduly delaying drivers. These roads are predominantly residential and the scheme will reduce community severance in the area. Experience in other 20mph areas of the City enforced by Average Speed Cameras is that Cyclists and e-bikes do not overtake cars. • Drivers already travel through 20mph Speed Limits and zones. There is no evidence to suggest that driving at 20mph is any more difficult or hazardous than at 30mph, the evidence indicates the opposite is the case. The Royal Society for the Prevention of Accidents references a study which showed that the risk of fatality for a pedestrian being struck by vehicle was 1.5% (one in 67) at 20 mph compared to 8% (one in 13) at 30 mph 20 mph zones and speed limits factsheet Feb 2017 (rospa.com) In other words, evidence indicates that pedestrians are 5 times more likely to die if struck by a vehicle travelling at 30 mph rather than 20 mph. • Ambulances and other Blue Light Services are exempt from prosecution when attending an emergency (ie displaying Blue lights). Average Speed Camera Systems are much easier for the emergency services to negotiate than traffic calming • A 2018 Transport for London study into the effects of Traffic Calmed 20mph Speed Limits found that <i>20mph zones do not appear to worsen air quality and they dramatically reduce road danger. They also support a shift to walking and cycling, generate less traffic noise and reduce community severance.</i>
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<ul style="list-style-type: none"> • Electric Cars can't be heard, are heavier and accelerate more quickly • This is a money making scheme • Much of the city already is slower than 30mph as there is so much traffic so what is the point of investing money in cameras etc when you can't drive that fast in the first place. • The UK has become so restrictive and is policed heavily, we have few freedoms where the majority can be responsible humans when it's the minority that cause issues. 	<p>scheme other than an encouragement to use more sustainable transport alternatives because of lower traffic speeds.</p> <ul style="list-style-type: none"> • Lower speeds will help address the issue of Electric Vehicles not being heard and their acceleration. • Plymouth City Council will derive no income from camera enforcement. Average Speed Camera Systems are enforced by the Police and fines levied either pay for Speed Awareness Courses and maintenance of the camera system or are paid to Central Government where the speeding offences are more serious. By law, any income left over after paying for the courses and maintenance can be spent only on Road Safety Initiatives by the Vision Zero South West Partnership. Vision Zero - A collaborative road safety community project (visionzerosouthwest.co.uk) • The location of the crossing is on the desire line between the 2 sections of Victoria Park and is where pedestrians and cyclists currently cross the road. In order for the crossing to operate safely, vehicle speeds need to be guaranteed to be below 30mph. A 30mph speed limit even when enforced could still see speeds of 35mph at the crossing site. It is recognised that the majority of roads covered by the Zone are already low speed environments. It would not make sense to exclude them on that basis when this would require the erection of signs on side roads indicating that there is a higher speed limit than the main road. • Only those breaking the speed limit will face penalties. Drivers complying the speed limit will not be affected.
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<ul style="list-style-type: none">• 20mph Speed Limits should be in place around schools. This area is too wide.• Can't use a speed limiter at 20mph. Can you make the speed limit 25mph?• The Scheme is discriminatory because the area is not particularly hazardous when compared to other areas of the City• Some drivers will find it difficult to adapt their driving style to the new limit• The restrictions will create thousands of lawbreakers	<ul style="list-style-type: none">• The Department for Transport recommends that Speed limits should be no shorter than 400m in length. The proposed Zone has 5 primary schools with several parks and Nursery Schools within its area. Pupils attending the nearby City College also walk through the area. Installing a smaller 20mph Zone for each school would require a large number of signs and in some cases the Zones would overlap and most of the area would be covered in any case.• A speed limiter is not required to abide by a 20mph speed limit and the zone will take little more than a minute to travel through at the legal limit. 25mph is not a legal speed limit in the UK.• There has been 1 Fatal, 9 Serious and 48 Slight Injury Collisions reported by the Police within the proposed Zone in the last 5 years. There may be areas with worse collisions rates within the City depending on where the boundaries are drawn but the area was chosen because its proximity to a scheme already proposed which requires lower speed limits. This is not discriminatory and will provide safety benefits to local people.• Drivers will have passed a driving test that qualifies them to drive on UK roads having due regard to the speed limit in place. 20mph Speed Limits have been in place in the UK since 1991. There are very few drivers who will not have needed to take this fact into account when taking their Driving Test.• The Average Speed Camera system Surveys indicate that 99.35% of drivers travelling along Old Laira Rd through the Average Speed Camera Zone do so without incurring a Notice of Intended Prosecution. If approved, it is hoped that this will Zone be similarly successful and that the vast majority of drivers will be able to negotiate the
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<ul style="list-style-type: none"> • The Laira Scheme was objected to be thousands of people. • Where is your pollution monitoring test? • Why not start fining Cyclists who cycle on footpaths • The New crossing will cause a build up of traffic, noise and increased engine emissions • Any loss of parking is unacceptable. Suggests that an underground car park could be constructed. • Relocation of Waste Bins will cause major problems for the residents of Polruan Tce. • Agrees that Drainage needs to be improved and suggests that overhanging tree branches are cut back to prevent bird droppings landing on cars. Alternatively Birds of Prey could be deployed at low cost to deal with the issue. 	<p>area without the need to break the speed limit.</p> <ul style="list-style-type: none"> • There have been very few objectors to the Old Laira Rd scheme. • No Pollution monitoring has been undertaken. • Cycling on footways and footpaths is illegal and the police can enforce against this. It is acknowledged that pedestrian and cycle conflict is a significant issue. Improving on road safety through the proposed reduction in the speed limit can be expected to help encourage more cyclists to use the road rather than the footway. It is also worth noting that there are very few reported casualties from cyclists colliding with pedestrians. • When the crossing is in use there may be a trade-off between pedestrian and cyclist safety, encouragement to use alternatives to the private car and pollution and noise caused by waiting vehicles. This is likely to be minor and will decrease as the domestic vehicle fleet increasingly moves to the use of Electric Vehicles as 2030 approaches • Loss of on street parking has been kept to a minimum and has involved significant re-design of the scheme to do so. An underground car park would be likely to cost several £m and would face significant challenges in an area with such a high water table. • This aspect will be monitored by the Council's Waste department • Noted
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<ul style="list-style-type: none"> • Buses will take longer to complete their journeys • Ridiculous, just educate drivers. • Concerned that Amazon and other delivery drivers will be penalised by the scheme and suggests 30mph corridors through the Zone for delivery drivers • Engines will burn more fuel and traffic calming could be put in as an alternative. • You can't travel at 20mph on most of the roads anyway and 20mph Zones are just a fashion Plymouth is copying from other Cities. • Install pedestrian phases at the Millbridge Signalled junction • Stronger enforcement of existing speed restrictions • Provide warning lights on the approaches to schools. 	<ul style="list-style-type: none"> • The time differences are likely to be a matter of seconds • The Highway Code and driving test process educates drivers on how to obey speed limits. Unfortunately a minority of drivers habitually break speed limits unless there is a realistic prospect of enforcement • The corridors mentioned are where the majority of collisions are occurring and where traffic speeds have to be lower because of the crossing point. Travelling at 20mph as opposed to 30mph will not greatly add to journey times. • Traffic calming produces more emissions than Average Speed Enforcement and would cost far more to cover the same area. • Plymouth is the first English Highway Authority west of Bristol to have implemented an Average Speed camera enforced 20mph Zone. The lower speeds are required to allow vulnerable road users to cross roads safely and to address injury collisions within the Zone. Agreed that many of the roads are already low speed and it would make little sense to erect signs on them telling drivers they can travel faster than they do at present. • A Scheme has been designed for this improvement but awaits funding. The proposed reduction in the speed limit would help improve the situation here in the meantime. • This would either involve a regular Police presence or enforcement cameras which are proposed as part of the scheme enforcing the 30mph limit rather than 20mph. Speeds would be in excess of 30mph and render the crossing point unsafe. • These have already been provided
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<ul style="list-style-type: none"> • Parking attendants and Police Officers could use hand held video equipment to enforce against delivery drivers using mobile phones. • OK on the side roads but not on the main roads • 1/3 of emergency calls are answered by first responders who do not have blue lights. • Scheme should only be introduced after a Referendum with an 80% majority • Speed Cameras would address the speeding problem on Wilton St • Will cause Rat Running and speeding traffic on linking roads. Area should be widened to include these areas • Will previous correspondence from members of the public be available. • There are currently no 30mph signs. 	<p>an enforceable speed limit and enforcement would still be required. This would also mean that the safety benefits of the 20 mph zone would not occur whilst at the limit is “switched off”.</p> <ul style="list-style-type: none"> • This is a Police function and operations of this nature are undertaken by automatic cameras which is a far cheaper option than deploying Police Officers to stand holding cameras for long periods. The Average Speed Camera system does not enable enforcement of against illegal mobile phone use to be undertaken. • The main roads are where the collisions are mainly occurring and the location of the new crossing point is on Eldad Hill requiring slower speeds at this location • Emergency First Responders have a statutory exemption if on a call. • Consultation responses will be reported via the Democratic process and decisions legally taken following statutory guidance. • Average Speed cameras will be installed on Wilton St of the scheme goes ahead to enforce the 20mph Speed Limit • The area covered by the limit has been expanded to the maximum extent it can be using the budget currently available. Monitoring of surrounding roads will take place to gauge the effects of the scheme if it is introduced. If judged to be a success there might be potential for extension of the scheme. • Correspondence is protected under GDPR regulations and cannot be made available in a way which might identify the correspondent. • No 30mph Repeater Signs are permitted within a street lit area. The
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<ul style="list-style-type: none"> • There will be a loss of parking on Millbridge, Hotham Place, Edgecombe Ave and Molesworth Rd. • Is this a way of introducing an Ultra Low Emission Zone • Reference to the 2018 Dft Study which concluded that unenforced or non-engineered 20mph Zones are less effective • Who will pay for the Cameras and maintenance • Speed Humps cause problems for drivers and passengers with back problems • Will all of the traffic calming in the area be removed if the Average Speed Camera systems are introduced. 	<p>street lights themselves impose the 30mph limit. This is made clear in Rule 124 of the Highway code.</p> <ul style="list-style-type: none"> • The total amount of legal parking lost is approximately 2 spaces. This has been very carefully designed as it is known that parking in the area for residents is at a premium. An alternative design without the Bus Boarder buildouts would have seen at least 6 legal spaces lost. There will be minor adjustments around the junction with Hotham Place and Edgecumbe Ave to allow pedestrians to cross the roads safely. These areas are all with 10m of a junction and any parking which currently takes place on is the offence of obstruction. There will be no loss of parking on Molesworth Rd. • Plymouth City Council have no intention of introducing a ULEZ. • Enforced Zones are effective. • The Cameras will be funded by Plymouth City Council in order to provide the benefits of the proposals. Ongoing Maintenance and upkeep will be funded by Devon & Cornwall Police. • Average Speed Camera systems are an alternative to Traffic Calming that avoids this issue. • Although there is not a large amount of traffic calming in the area there is no intention of removing it as it acts locally to reduce speed and the costs of removal would be prohibitive, although this is something that could be potentially reviewed in the future when traffic calming features are due for renewal or replacement. No further traffic calming would be required in the area.
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<ul style="list-style-type: none"> • Several comments about Exeter removing speed Limits. • Several comments about increased costs of driving, braking etc • Combine the existing Zebra Crossing and the proposed crossing into a new facility to the south of Hotham place • Why not install noise detectors as a way of slowing traffic down • Cyclists should dismount when using the crossing • More funding should be spent on Road Safety Education rather than engineering roads to be safer. Use of 	<ul style="list-style-type: none"> • Devon County Council implemented an experimental Low Traffic Neighbourhood in Exeter and removed it after public engagement. This was not linked to the speed limit which has remained unchanged. • Lower driving speeds should result in lower wear and tear on both tyres and brakes. Driving style is of course important. This also applies to Fuel Economy where a smoother driving style leads to greater fuel economy. • These issues have already been considered as a part of the design process. This would lead to a greater loss of parking and pedestrians and cyclists crossing between Stonehouse Creek and Victoria Park would be unlikely to divert 140m out of their way to cross the road. Similarly the existing Zebra Crossing is situated adjacent to shops on both sides of the road. Pedestrians using the existing zebra crossing are unlikely to want to cross 2 further roads and divert for 70 metres rather than use the existing desire line. • Noise levels are not speed dependent and therefore this would not be an effective means of slowing traffic. Whilst there is experimental technology being trialled in the UK to enforce against noise pollution these are in their infancy and are likely to take several years before the Home Office will consider granting approval for them to be used on UK roads for enforcement purposes. • The crossing is designed so that both pedestrians and Cyclists can use the facility together. The crossing points are segregated • We need both. Budgets for Road Safety Education have been severely cut since 2010. Today's pedestrians have many issues to be aware of when
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<p>Mobile Phones distracts pedestrians when crossing the road.</p> <ul style="list-style-type: none"> • Several responses suggested that the money could be better spent on filling in potholes, CCTV to prevent Anti-Social Behaviour, Removal of Abandoned vehicles. Etc. • In Average Speed Camera controlled areas drivers tends to travel at a couple of miles an hour below the speed limit to be sure they won't trigger the cameras. It isn't necessary to impose a 20mph limit because drivers will travel below 30mph if it is similarly enforced • A cheap option rather than improving the roads to improve safety by widening footpaths and providing better visibility at junctions • Older cars are not designed to travel at 20mph • Newer cars are not designed to travel at 20mph • Improve the signals at Ford Hill 	<p>interacting with live traffic including quieter vehicles. However, our responsibility to design new schemes to be as safe as possible for all road users cannot be ignored when there are proven measures available to ensure a higher level of safety.</p> <ul style="list-style-type: none"> • The budget available for this scheme is mostly grant funding from central government to be spent to enable people to walk and cycle or use wheelchairs and mobility scooters more safely. It cannot be used for other purposes. • Approach speeds to the new Zebra Crossing need to be below 25mph. Contrary to the statement made, it is known that drivers will often drive a couple of mph above the speed limit even when enforced by cameras taking advantage of the perception that enforcement levels will be slightly above the speed limit. • Partly correct as introducing an enforced 20mph Zone is far cheaper than undertaking major works on multiple roads which the City Council would not be able to afford. It is also worth noting that in a number of locations, due to the constrained road environment and parking, the opportunities for changing layouts without removing buildings is limited. • 20mph Speed limits have been legal on UK roads since 1991. Drivers are required to abide by the posted speed limit • 20mph Speed limits have been legal on UK roads since 1991. Drivers are required to abide by the posted speed limit • A scheme to improve the signals at Ford Hill is programmed for the current financial year.
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<ul style="list-style-type: none"> • Improve public transport first • 202 name Petition submitted objecting to 15 minute Cities, Facial and Automatic Number Plate Recognition Cameras (ANPR), traffic restrictions and any other type of restrictions. Opposes ant restrictions on Freedom of movement and/or fines in the name of Climate Emergencies, net zero, decarbonisation and SMART Cities but not limited to these. • The scheme will cause congestion and PCC will then use this as evidence to introduce a congestion charge. • The Old Laira Rd scheme is not used as justification for the proposal because it has been a failure with no reduction in collisions observed. 	<ul style="list-style-type: none"> • The scheme is intended to improve public transport by providing improved bus boarding facilities. • 15 minute cities is a renamed decades old planning concept whereby the needs of local populations are available to residents on foot or cycling within 15 minutes travel time (District Centres). The concept does not involve any restriction on residents travelling further afield or using their car. However, there has been some misleading information published about the concept online which is believed by some in error. This project has no link with any plans to introduce 15 Minute Cities in Plymouth. The scheme, if introduced will be enforced by ANPR Cameras operated by the Police which do not have facial recognition software fitted to them. Whilst the Climate Emergency is established fact, there are no plans associated with this scheme to fine drivers for issues associated with Decarbonisation. Neither is the project linked to any SMART City proposals although it is observed that many drivers already check google maps to identify congestion level before travelling. • There is no evidence that the scheme will cause congestion and PCC have no intention of introducing a Congestion Charge • The Old Laira Rd scheme, similar to this proposal was not justified on casualty grounds alone. However, although the evaluation period for the scheme is not yet complete initial indications are that the scheme has reduced collisions as well as providing a safer and more user-friendly environment for residents and vulnerable road users. In the 5 years Before the scheme was introduced there were 9 injury collisions reported by the Police including 1 Serious. In the 27 months since the scheme has been in place there have been 3 Slight Injury
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<ul style="list-style-type: none"> • Will cause collisions and road rage incidents. • No-one wants an ugly yellow pole outside their house • Neurodiverse individuals find it easy to drive at 30mph but not at 20mph because of the noise from the gears. • In Wales the 20mph National Speed Limit has led to abuse of cyclists by impatient drivers • Build a bridge instead <p>Comments in Favour</p> <ul style="list-style-type: none"> • Road Casualty Reduction Officer at Devon & Cornwall Police : “In recent years, authorities in areas of the UK have reduced speed limits to 20mph, particularly in areas with high volumes of foot traffic and in areas near to schools. • “We are aware of the collision history in North Road West and Wilton Street 	<p>collisions reported, none have involved excessive speed and all occurred within the first 6 months of introduction. There have been no collisions in the area for the last 2 years.</p> <ul style="list-style-type: none"> • Experience on Old Laira Rd is that Collision numbers are falling and there is no evidence of road rage incidents. • Most if not all of the cameras will be deployed on lamp columns and whilst they will be painted yellow to help warn drivers, most of the locations are away from domestic dwellings • All drivers are required to drive at the posted speed limit regardless of any protected characteristic. • Experience in Plymouth of an enforced 20mph Zone is that Cyclists perceive the road environment to be less dangerous and drivers have not been reported to be abusive. • The cost of building a bridge would far exceed the costs of the measures designed and would likely require the removal of trees and take up a large footprint of the Park and land not in the ownership of the council in order to construct it. Bridges are also not favoured by many vulnerable road users who would rather risk an uncontrolled at grade road crossing that negotiate a bridge structure. • Comments noted • Comments noted
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and believe that the proposals to implement a 20mph speed limit put forward by Plymouth City Council will reduce the number of collisions and prioritise the safety of pedestrians and cyclists using the crossing point.”

- The Scheme will improve Road Safety
- The scheme will improve air quality
- Residents Views should take precedence
- Slower Travel Time is minimal
- Drivers already exceed 30mph within the proposed Zone.
- Introduce a ULEZ
- Extend the 20mph Zone to surrounding areas
- The 20mph Zone will be a waste of money if its not enforced
- More powerful Street Lights are required because of the trees.

- This is one of the main purposes of the scheme.
- Traffic Calmed 20mph Zones do not appear to worsen air quality. Average Speed Camera Enforced 20mph Zones are easier for drivers to negotiate. Congestion can increase local air pollution but its impacts are complex and depend on several factors. [Speed, emissions & health \(tfl.gov.uk\). \(https://content.tfl.gov.uk/speed-emissions-and-health.pdf\)](https://content.tfl.gov.uk/speed-emissions-and-health.pdf)
- Not all respondents have provided their address but those that have are registered as being residents of the proposed zone or not.
- In many cases the additional travel time for traversing the zone will be less than a minute compared to 30mph.
- There is a level of disregard for the 30mph speed limit on the main through roads within the zone
- There are no plans to introduce a ULEZ within Plymouth. With the move to electric vehicles it is predicted that emissions will fall substantially over the coming years.
- If the scheme is approved its success will need to be monitored before any potential extensions are considered.
- It is intended that the 20mph Zone will be enforced.
- Unfortunately the trees do block some of the Street Lights. Installing more powerful lights would not help unless the tree growth were reduced which is not favoured by many.

<ul style="list-style-type: none"> • Camera Placement will need to take account of the potential for Rat running • Support the scheme because of the significant reduction in casualties seen in Wales in area covered by the new 20mph Speed Limit • The design feels like a compromise and should be landscape led with a priority for Pedestrians and Cyclists • Why are the Car Parking Spaces being kept? • Offsetting the entrances won't be adhered to by some. Why can't the design incorporate a raised platform in different colours to join up the 2 entry points and act as a shared space. • The whole length of the bridge should be a raised table. <p>Comments Partially in Favour or not objecting to the scheme.</p> <ul style="list-style-type: none"> • The level of consultation should have been greater more inclusive • Not enough information regarding Collision Data, Vehicle Speeds, Cost Benefit Analysis, Economic Assessments and Pollution monitoring was made available 	<ul style="list-style-type: none"> • This element will be part of the design if approved • The reduction in casualties reported in Wales is significant and is being studied carefully. • The design is a compromise between the needs of residents, businesses, pedestrians, cyclists, people with disabilities, and the travelling public on this busy distributor road. • The Car Parking spaces are needed by residents, visitors and businesses. • The design has had to consider both the safety of all road users and the available budget. Shared space as a concept is no longer favoured especially where vulnerable road users are at risk and is not considered appropriate in this location which is relatively busy with motorised traffic. • The costs of this would be prohibitive, would add significant extra weight to the existing bridge structure and would cause significant drainage challenges in an area where drainage problems are regularly experienced. • The consultation undertaken involved over 5000 letters being sent to local residents with large amounts of information available online. Those unable to access online resources were offered paper copies of the plans by post if required. • Casualty, Speed and vehicle volume data is available if required although there may be a charge in some cases. This information was used in evaluation the scheme and contributed to design recommendations as did a cost comparison of various scheme options. It is not usual for formal Economic
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<ul style="list-style-type: none">• Build a subway rather than an at grade pedestrian crossing• Construct a signalised Toucan crossing rather than a Zebra• Ensure that there is adequate warning signage of the crossing on the Eldad Hill approach• Better value for money if the Cameras were installed on the A38• Phased approach should be taken before installing cameras.	<p>assessments and Pollution monitoring to be undertaken on schemes of this value, although we are confident that the scheme represents good value for money.</p> <ul style="list-style-type: none">• The costs of construction of a Subway would far exceed the budget of the current scheme. Due to the high water table any subway constructed might well be underwater as well as underground and would require a land footprint outside of the area owned and controlled by the City Council. Some vulnerable road users are unwilling to use subways due to fears about antisocial behaviour and crime.• The advantage of the Belisha Beacons used at Zebra Crossings is that the Globe is visible for 360° and can be seen for further, closer to bends and junctions. A Cowled Signal Head has to be aimed directly at traffic and cannot be seen by approaching traffic if there is a bend involved. The zebra crossing also involves less overall delay for users and traffic because traffic can restart as soon as the pedestrian/cyclist has finished crossing.• Signing will be in place on the approach to the crossing• The A38 is not owned or maintained by the City Council. Management of road safety on the A38 is undertaken by National Highways on behalf of the Department for Transport.• It is known that an Average Speed camera System is likely to maximise compliance with the Speed limit and the safety of vulnerable road users and is the best value for money to achieve this. A phased approach involving signing, lining, traffic calming etc would cost more to implement and might still require camera deployment if unsuccessful. Traffic Calming is often unpopular with residents due to the
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<ul style="list-style-type: none"> • Ensure that Cameras cannot be used for corrupt purposes. 	<p>noise and vibrations caused 24 hours a day.</p> <ul style="list-style-type: none"> • Collection of personal data in the UK is strictly controlled and information gathered by Average Speed Cameras can only be held if in support of a prosecution. The cameras do not use Facial Recognition software and are only permitted to be used for speed enforcement.
<p>Pedestrian crossing</p>	<p>Responses received were generally in favour of the introduction of the pedestrian crossing although concerns were voiced regarding its proximity to the bend, loss of parking and the potential for improving the existing Zebra Crossing at the shops, all of which have been addressed above.</p> <p>Another strong theme was the need to introduce pedestrian phases at the Millbridge Signals from both those in favour and against the 20mph Speed Limit</p>

4. RECOMMENDATION

1. It is recommended that: The scheme is constructed and introduced along with the associated Traffic Orders as advertised to include the 20mph Zone enforced with an Average Speed Camera system.

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.