

Meeting of:	Cabinet
Date of Meeting:	Thursday, 07 September 2023
Relevant Scrutiny Committee:	Environment and Regeneration
Report Title:	Objection Report: Proposed Traffic Regulation Order (TRO) for Exceptions to Wales 20mph Default Speed Limit and Implementation of Ancillary Speed Limits.
Purpose of Report:	To advise Cabinet of the recommendations made by the Environment and Regeneration Scrutiny on 18th July, 2023 and the public objections received to the proposed TRO and to agree an appropriate way forward.
Report Owner:	Cabinet Member for Neighbourhood and Building Services
Responsible Officer:	Miles Punter - Director of Environment and Housing Services
Elected Member and Officer Consultation:	<p>Accountant Environment and Housing Services</p> <p>Legal Services (Committee Reports)</p> <p>Operational Manager, Transport Services</p> <p>Operational Manager, Neighbourhood Services: Operations</p> <p>Operational Manager, Neighbourhood Services, Healthy Living and Performance</p>
Policy Framework:	This Report is a matter for Executive Decision by Cabinet.
<p>Executive Summary:</p> <ul style="list-style-type: none"> • As Cabinet has previously been advised, the default speed limit of 20mph on Restricted Roads comes into force in Wales on 17th September, 2023. • Certain roads can be identified as exceptions, in accordance with Welsh Government guidance published in October 2022. Setting exceptions involves retaining the speed limit generally on A and B Class Restricted Roads at 30mph rather than it defaulting to 20mph. • Authority was given by the Cabinet Member for Neighbourhood and Building Services and the Director of Environment and Housing Services to give public notice of the proposed Order dated 20th June, 2023. 	

- Public notice for the proposed Order was given on Thursday 22nd June, 2023, inviting objections in writing, by midnight on Wednesday 19th July, 2023.
- An update Report on the Proposed Traffic Regulation Order (TRO) for Exceptions to Wales 20mph Default Speed Limit and Implementation of Ancillary Speed Limits was presented to Cabinet on 6th July, 2023 (Minute No. C51 refers).
- The Cabinet Report of 6th July 2023 was considered by the Environment and Regeneration Scrutiny Committee on 18th July, 2023, with comments raised by the Committee to be referred to Cabinet for its consideration within this report.
- During the TRO public consultation period, there were 153 contributors and 193 responses or concerns received, many of which related to an alleged inconsistent application of the Welsh Government 'Exception Guidance'.
- The objections and other comments are summarised with officer responses to the points raised in the main body of this report.
- This report informs Members of the objections received as part of the statutory public consultation, as well as another objection received outside the consultation closing date, which has been included for completeness.
- As a result of the public consultation five changes are proposed as follows:
 1. **West Farm Road (part), Ogmore-by-Sea – removal of 20 mph as private road (Appendix C refers).**
 2. **Cardiff Road, Dinas Powys - extension of default to 20 mph (Appendix D refers).**
 3. **St Nicholas Road, and Park Avenue Barry – default to 20 mph (Appendix D refers).**
 4. **Ewenny Cross Corntown and Ewenny – default to 20 mph. (Appendix D refers).**
 5. **Windsor Road (between Plassey Street & Marconi Avenue) – default to 20mph (Appendix D refers).**
- The objections have been considered and reviewed as outlined, but for the reasons set out in the report some objections have not been upheld and Cabinet approval is sought to accept any amendments to the proposed traffic regulation order, to ensure the 30mph exception sites and other ancillary speed limits are implemented.
- Use of the Council's urgent decision procedure process is proposed in order for the new speed limits to be introduced by 17th September 2023, the commencement date for the new default speed limit in Wales.

Recommendations

1. That Cabinet notes the recommendations made by Environment and Regeneration Scrutiny on 18th July, 2023, and the officer responses to both these recommendations and the objections received as part of the public consultation.
2. That Cabinet approves the amendments to the proposed Traffic Regulation Order as identified in the schedules provided at Appendix C and D.
3. That the objectors are notified of this decision.
4. That Cabinet agree the use of article 15:14 (urgency procedure) in respect to the above recommendations.

Reasons for Recommendations

1. To ensure that the views of the relevant Scrutiny Committee and objectors have been considered prior to a decision made by Cabinet.
2. To permit the proposed order to be amended to enable the proposed 30mph exception and other ancillary speed limits to be implemented, as reflected in the comments from the public consultation.
3. To ensure that all those who took part in the TRO consultation are advised of the outcome of the process.
4. To ensure a prompt implementation of the TRO's to meet the date set by Welsh Government for implementation of the new default 20mph speed limit on 17th September, 2023.

1. Background

- 1.1 The default speed limit of 20mph on Restricted Roads comes into force in Wales on 17th September, 2023.
- 1.2 Certain roads can be identified as exceptions, in accordance with Welsh Government guidance published in October 2022. Setting exceptions involves keeping the speed limit generally on A and B Class Restricted Roads at 30mph rather than it defaulting to 20mph.
- 1.3 A Report on the Proposed TRO for Exceptions to Wales 20mph Default Speed Limit and Implementation of Ancillary Speed Limits was presented to Cabinet on 6th July, 2023 ([Minute No. C51](#)). The purpose of the Report was to provide an update on the TRO process and proposed exceptions identified to Wales 20mph Default Speed Limit and other proposed ancillary speed limits. The Cabinet Report and Minutes can be viewed via these links.

<https://www.valeofglamorgan.gov.uk/Documents/Committee%20Reports/Cabinet/2023/23-07-06/Proposed-TRO-Exceptions-to-Wales-20mph-Speed-Limit.pdf>

[https://www.valeofglamorgan.gov.uk/Documents/ Committee%20Reports/Cabinet/2023/23-07-06/Minutes.pdf](https://www.valeofglamorgan.gov.uk/Documents/Committee%20Reports/Cabinet/2023/23-07-06/Minutes.pdf)

- 1.4** The Cabinet Report of 6th July, 2023 was considered by the Environment and Regeneration Scrutiny Committee on 18th July, 2023. At the meeting following detailed consideration, the Scrutiny Committee recommended that comments raised by the Committee be referred to Cabinet for its consideration. The Minutes of the meeting (Minute No. 230 refers) can be viewed in the following link. The points raised during the Scrutiny meeting on 18th July have either been addressed within the formal record of the meeting or otherwise are covered by the detailed Officer responses provided in Section 2 of this report, 'Key Issues for Consideration' as below.

[https://www.valeofglamorgan.gov.uk/Documents/ Committee%20Reports/Scrutiny-ER/2023/23-07-18/Minutes.pdf](https://www.valeofglamorgan.gov.uk/Documents/Committee%20Reports/Scrutiny-ER/2023/23-07-18/Minutes.pdf)

- 1.5** Authority was given by the Cabinet Member for Neighbourhood and Building Services and the Director of Environment and Housing Services to give public notice of the proposal to progress with a Traffic Regulation Order to the 'Proposed Exceptions to Wales 20mph default Speed Limit, Implementation of Ancillary Speed limits and Revocation of 20mph Speed Restriction Order' dated 20th June 2023.
- 1.6** The statutory legal public notice for the proposed Traffic Regulation Order was given on Thursday 22nd June, 2023, inviting objections in writing, by midnight on Wednesday 19th July, 2023 containing the grounds upon which any objection was made.

2. Key Issues for Consideration

- 2.1** During the statutory public consultation period 22nd June to 19th July, 2023, there were a total of 153 contributors and 193 responses or concerns received. These ostensibly related to the alleged inconsistent application of the Welsh Government 'Exception Guidance' and the inaccuracy of the 'Statement of Reasons' that was publicised on the notice of proposals.
- 2.2** A copy of the delegated authority report, with the associated drawings and schedules are attached at Appendix 'A', with the objections and other comments attached at Appendix 'B' to this Report. The objections are summarised below, together with the officer response to each of the points raised.
- 2.3** **Objector 1 – Cycle UK.**

2.4 Concern 1 – Road Traffic Regulation Act 1984 (RTRA)

2.5 “VoGC can make an order under section 1 of the RTRA where it considers it “expedient having regards to a number of factors” (the statutory purposes), Those statutory purposes are:

(a) for avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising, or

(b) for preventing damage to the road or to any building on or near the road, or

(c) for facilitating the passage on the road or any other road of any class of traffic (including pedestrians), or

(d) for preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regards to the existing character of the road or adjoining property, or

(e) (without prejudice to the generality of paragraph (d) above) for preserving the character of the road in a case where it is specially suitable for use by persons on horseback or on foot, or

(f) for preserving or improving the amenities of the area through which the road runs

(g) for any of the purposes specified in paragraphs (a) to (c) of subsection (1) of section 87 of the Environment Act 1995 (air quality).”

2.6 Where a highway authority (HA) issues a notice proposing to make a TRO, that notice must include a statement of reasons (SoR) outlining the reasons for the order, which must have regards to and identify the statutory purposes for which it is satisfied that it is expedient to make the TRO. The SoR within the notice issued by VoGC on 22 June states that:

2.7 *“The Order is necessary to maintain the existing speed limits of 30mph on selected strategic roads within the County after the Welsh Government has passed legislation to implement a 20mph default speed limit in urban areas nationally throughout Wales in the interest of road safety (The Restricted Roads (20 mph Speed Limit) (Wales) Order 2022). The Council as Local Highway Authority considers that these roads are strategic routes with higher volumes of daily traffic compared to urban residential streets and as such do not meet the criteria or the nature of a road with a speed limit of 20 mph. The Council considers that the existing 30 mph speed limit is an appropriate speed limit in order to maintain a reasonable traffic flow on higher traffic volume strategic routes.”*

2.8 There is nothing within the SoR which refers to danger to road users, preventing damage, preserving amenities, or any of the other statutory purposes. The SoR does refer to maintaining the speed limit to “maintain a reasonable traffic flow”, however that is insufficient to satisfy the statutory purpose with S1(1)(c) RTRA, which requires the HA to consider how to facilitate the passage on the road of any class of traffic, including pedestrians and cyclists.

2.9 VoGC has not:

- Identified which class of traffic it wishes to facilitate the passage of.
- Mentioned or in any way demonstrated that it has considered the requirements, passage, or safety of any or each class of traffic.
- Addressed in any way any safety issues.

2.10 When considering whether to make a TRO, VoGC also has a statutory duty to consider the matters outlined at section 122 RTRA, “to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians)”. It is clear from the SoR that VoGC has failed to consider, adequately or at all, the expeditious, convenient, and safe movement of cyclists and pedestrians.

2.11 Officer response 1:

2.12 It is accepted that the ‘Statement of Reasons’ provided as part of the proposed TRO was poorly worded and did not reflect the process followed in proposing the A & B class road exceptions identified in the TRO. However, it is the case that the process for considering proposed exceptions to the 20mph default speed limit throughout the Vale (so that the speed limit remains at 30mph) was carried out pursuant to the guidance provided by Welsh Government “Setting exceptions to the 20mph default speed limit for restricted roads”.

2.13 This position was clarified in the report presented to update Cabinet on the TRO process associated with proposed exceptions to Wales 20mph Default Speed Limit and proposed ancillary speed limits of 6th July, 2023. It was also confirmed in the delegated authority report presented to the Cabinet Member for Neighbourhood and Building Services and the Director of Environment and Housing Services when seeking authority to give public notice of the proposed TRO. Ward Members and Community Councillors who attended the presentation and briefing sessions on the proposed Wales 20mph default speed limit and exception process on 15th and 17th November, 2022 or the 25th and 26th May, 2023 would also have been apprised of the process following the Welsh Government guidance for setting exceptions.

2.14 It is therefore a matter of record that officers have referred to and interpreted the guidance provided by the Welsh Government to establish the proposed ‘exceptions map’ which formed part of the public consultation for the TRO. Further, the process was evidence based using information from the Council’s

GIS database, Google Street view (where current and appropriate) and latest collision data records as well as professional engineering judgement, local knowledge and experience in a reasonable, reasoned and proportionate methodology to demonstrate and substantiate the basis for making any exception from the default 20mph limit.

- 2.15** The information provided within the TRO for public consultation clearly identified the roads proposed to be subject to an exception from the 20mph default speed limit in the Schedule and Plans forming part of the TRO documentation and therefore represented a fair and reasonable opportunity for all parties to respond and / or object to those proposals as part of the TRO process. A spreadsheet '20mph Exception Map Feedback' was also maintained to record the decisions made whilst following the Welsh Government guidance 'Setting exceptions to the 20mph default speed limit for restricted roads' which is attached at Appendix E. An initial copy of the document was shared with TfW in February 2022.
- 2.16** The published legal Notice for the TRO referred to full details of all the affected Roads in Schedules 1 – 4 being available for inspection on the Council website. The details on the Council's website for the 20mph Speed Limit Exceptions Consultation confirmed that the Council had identified a number of 20mph 'exception roads' in the Vale of Glamorgan in line with the Welsh Government exceptions criteria for which an external link was provided. The website also provided full and detailed information for the Welsh Governments rationale for change to a 20mph default speed limit.
- 2.17** Therefore, whilst the guidance was not referenced in the 'Statement of Reasons' for the TRO, it can be readily demonstrated that the rationale and process for setting of exceptions was well documented and, as such, it is considered that the council has adequately and appropriately complied with the relevant legislation and requirements in accordance with the Road Traffic Regulation Act 1984 (RTRA) when progressing the TRO and undertaking the public consultation.
- 2.18** Furthermore, the Highway Authority conducts annual reviews on the road traffic collisions supplied by the Welsh Government. It was felt during those reviews that the proposed 30mph exceptions could have benefited from being made 20mph by TRO, this action would already have been taken. This has been the case in many areas, especially outside schools where such limits are appropriate and will be respected by drivers.
- 2.19** It is unclear why the objector is referring to the use of Section 122 of the RTRA in relation to this proposal as the requirements of this Section of the RTRA as listed below are not material considerations when setting exceptions under the Welsh Government guidance "Setting exceptions to the 20mph default speed limit for restricted roads" -

(a) the desirability of securing and maintaining reasonable access to premises;

(b) the effect on the amenities of any locality affected 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 roads run;

(bb) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);

(c) 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; and

(d) any other matters appearing to the local authority to be relevant.

2.20 The Welsh Government is in the process of updating its guidance for “Setting Local Speed Limits in Wales”. The Council will monitor and undertake further reviews of restricted and other roads within its local highway network where concerns are identified or as considered appropriate in the future. These will be based on the updated guidance when published by Welsh Government and take appropriate measures to ensure that, as far as reasonably practicable, the speed limits on all its roads are suitable for the conditions, the needs of the local community and consistent with its published policy objectives.

2.21 Concern 2 – Welsh Government guidance on setting exemptions to the 20mph default speed limit on restricted roads:

2.22 “The Senedd has approved legislation to lower the default national speed limit on restricted roads from 30mph to 20 mph to reduce the number and severity of collisions and casualties, to enable more people to use active travel, to reduce environmental impacts and to improve people’s quality of life in communities across Wales. That legislation comes into effect on 17 September 2023. The roads to which these TROs relate are restricted roads, and accordingly, unless they are exempted from the new 20mph default speed limit through the TRO process, the speed limit on those roads will be reduced from 30mph to 20mph in September.

2.23 Whether or not any particular HA supports or otherwise agrees with the changes introduced by the Senedd is, respectfully, irrelevant. The new default limit applies unless the HA makes a TRO exempting the default limit. To ensure that a consistent approach to exemptions across Wales is taken by Has, the Welsh Government has produced guidance (the guidance) on setting exceptions: <https://www.gov.wales/setting-exceptions-20mph-default-speed-limit-restricted-roads-html> to the default limit. The guidance is to be used as a basis to demonstrate reasoning for making any exception and includes a two stage

test, set out below, which involves HAs asking themselves two principal questions when deciding whether a 30mph exception should be made, namely:

2.24 Question A: Are there significant numbers (or potential numbers, if streets were lower) of pedestrians and cyclists travelling along or across the road?

2.25 If the answer to A is 'no' then an exception for a 30mph speed limit may be appropriate.

2.26 Question B: If the answer to A is 'yes', are the pedestrians and cycling mixing with motor traffic?

2.27 If the answer to B is 'no' then a 30mph speed limit exception may be appropriate.

2.28 If the answer to B is 'yes' then a 20mph speed limit will be appropriate unless the robust and evidenced application of local factors indicates otherwise.

2.29 It is important to note that question A refers to the potential numbers of pedestrians and cyclists who might travel along or across the road if the speeds were lower, not just the existing numbers, given that the existing numbers may well be lower than they could be, because people will be deterred from using active travel modes if the road conditions do not feel safe. Part of the rationale for the introduction of the new default limit was to lower existing speeds on restricted roads, so that more people felt that it was safe enough to walk or cycle, and to enable more active travel journeys. Accordingly, the guidance specifically states that decisions on exceptions should not be influenced by existing traffic speeds.

2.30 VoGC has manifestly failed to address the criteria within the guidance or consider the two stage test set out within the guidance. It has merely asserted that "these roads do not meet the criteria or the nature of a road with a speed limit of 20mph". There is no evidence or information to suggest that VoGC has:

- Considered the existing cyclist and pedestrian flow along or across any of the roads subject to these TROs.
- Considered the potential cyclist and pedestrian flow along or across any of these roads, if the speed limit was reduced.
- Considered the extent to which pedestrian and cycle flow along or across any of these roads is deflated or discouraged by perceived or actual road safety concerns.
- Understood, or considered adequately or at all, the guidance, and in doing so addressed the two stage test within the guidance."

2.31 Officer response 2:

- 2.32** The Council has and can demonstrate that the process for considering proposed exceptions to the 20mph default speed limit throughout the Vale of Glamorgan was carried out pursuant to the guidance provided by Welsh Government “Setting exceptions to the 20mph default speed limit for restricted roads”.
- 2.33** The Council has considered and interpreted the Guidance provided by Welsh Government and assessed evidence using the Council’s GIS database, Google Street view (where current and appropriate) and analysed latest collision data records and composition of traffic (where available) as well as using professional engineering judgement combined with local knowledge of the highway network in a reasonable, reasoned and proportionate methodology to substantiate the basis for making any exception from the default 20mph speed limit on A & B Class roads.
- 2.34** In all cases the Council has considered the principal question whether there are ‘significant’ numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road and the extent that they need to mix with motor traffic for proposed exception sites.
- 2.35** The Council has used place criteria as a primary guide when assessing all A & B Class roads, albeit with mitigations based on a variety of local factors to aide decision making associated with Place criteria; protected facilities meeting relevant criteria within Active Travel Act Guidance (ATAG); and safety of vulnerable road users being considered when determining what roads to retain at 30mph. The presence of local shopping / business / tourist / visitor areas as an additional attractor is included within local factors to substantiate evidence of significant pedestrians and cyclists use along a road.
- 2.36** It is impossible to hypothesise the potential number of cyclists or pedestrians that will use a route based on perceived road safety. Perception differs from person to person and unfortunately the Welsh Government guidance did not provide any forecasting model, or formula to determine future usage. If the strategic ‘A’ and ‘B’ routes were reduced to 20mph, the composition and volumes of motor traffic would potentially deter inexperienced or leisure cyclists from using those routes. However, it is acknowledged that more seasoned and experienced cyclists would use those routes, irrespective of the types and/or volume of traffic.
- 2.37** However, it was generally considered that both traffic speed and volume deter potential pedestrian and cyclist use and as most A&B Class roads carry significant volumes of traffic it is therefore deemed unlikely and improbable that reducing speed alone will increase usage on this class of road. The attractiveness or desirability of roads for use by pedestrians and cyclists also considered the type, nature and character of the route as well as speed limits of approach roads to a local area.

- 2.38** The Council receives concerns from the public where they feel it is unsafe to walk or cycle on our roads. We always investigate those concerns and if it deemed appropriate, would already have reduced those speed limits to 20mph. Officers reviewing the proposed exception sites fully understood the Welsh Government guidance and applied the two-stage test accordingly. It should be noted that Welsh Government gave no additional funding for pedestrian and traffic surveys on our strategic routes, nor did Welsh Government provide growth factors for future cyclist and pedestrian usage based on speeds dropping to 20mph.
- 2.39** The Welsh Government guidance “Setting exceptions to the 20mph default speed limit for restricted roads” was not published until November 2022. This delay gave officers very little opportunity to undertake any quantitative assessments of cyclists and pedestrians using restricted roads that are currently 30mph. Furthermore, Welsh Government gave no additional funding for any preparatory work, including surveys.
- 2.40** Due to the delay in publishing the Guidance, officers had no option but to primarily base their exception proposals on a mixture of professional local knowledge, collision investigations and using existing traffic surveys already held.
- 2.41** Where numerous objections were received in specific areas, officers undertook a further review and, in several cases, have made recommendations within this Report to amend the 30mph exceptions, whereby additional lengths of road will default to 20mph.
- 2.42** **Concern 3 – Unfair consultation process**
- 2.43** Attention is drawn to the Gunning Principles and lawful consultation, namely that:
- Consultation must be at a time when proposals are still at a formative stage.
 - Sufficient reasons must be put forward for any proposal to permit ‘intelligent consideration’ and response.
 - Adequate time is given for consideration and response.
 - The product of consultation is conscientiously taken into account by the decision maker(s).
- 2.44** Put simply, these criteria are a prescription for fairness and mean that a public body must: consult before they have made up their mind; provide people with the right kind of information for them to be able to take part in the consultation; give people enough time to participate and respond, and give consultation responses conscientious consideration.

- 2.45** As already outlines, VoGC appears to have concluded already that the roads subject to these TROs are strategic routes with higher volumes of daily traffic compared to urban residential streets and as such do not meet the criteria or the nature of a road with a speed limit of 20 mph. No evidence has been presented to support that contention, and that argument is presented in a manner which implies that VoGC believes that to be the relevant test.
- 2.46** In fact, as already outlined, VoGC has failed to consider the statutory purposes within the RTRA, and to that extent, the nature and limitations upon its powers to make lawful TROs. It has also failed to consider adequately or at all the relevant guidance.
- 2.47** In responding to this consultation, Cycling UK and indeed others, can only respond to the information provided. It is unreasonable and unfair to require anyone to respond to matters, evidence, or things that were in the minds of council officers when they launched this consultation but failed to set out accurately or at all within the SoR or accompanying documents.
- 2.48** If, in response to this and other consultation responses, VoGC now wish to refer to other data, evidence, or arguments not previously presented in a manner in which the public could readily understand and respond to, then the public have not been provided with sufficient reasons by VoGC for the proposals to permit ‘intelligent consideration’ and response. To that extent the consultation process is flawed, unfair, and unlawful.
- 2.49** **Officer response 3.**
- 2.50** The “Gunning Principles” are rules that were proposed by Stephen Sedley QC in 1985, and subsequently accepted by the Judge in the Gunning v London Borough of Brent case. The legal standing of these four principles is still tested and used to establish the legitimacy of how public consultations are assessed.
- 2.51** To enable the Council to progress with Traffic Regulation Order proposals, the statutory instrument *“The Local Authorities Traffic Orders (Procedure) (England and Wales) Regulations 1996” (the Regulations)*, is used, to ensure that proposals are progressed in a consistent and lawful manner.
- 2.52** Whilst the Regulations do not refer to the Gunning Principles, the publication and objection processes outlines in section 7 and 8 do align with those principles:
- Consultation by Welsh Government took place at the formative stage. Sufficient reasons were provided to enable considered views to be submitted to the Council.
 - Consultation took place between Thursday 22nd June and Wednesday 19th July, 2023, which was deemed adequate to enable consideration of the proposals.

- Objections, together with officer responses, will be considered by Cabinet and where time allows scrutinised by Committee, who will decide whether to agree, or overrule any or all objections.
- 2.53** Following the Welsh Government’s legislative consultation to default restricted roads to 20mph, concerns were made by the public and between Councils and the Welsh Government, that some routes may not be appropriate for 20mph. As a result of this, the Welsh Government produced guidance for *“setting exceptions to the 20mph default speed limit for restricted roads”*.
- 2.54** The guidance was received in November 2022, which was late into the development of the 20mph project and gave Councils little opportunity to undertake any quantitative assessments of cyclists and pedestrians using restricted roads that are currently 30mph.
- 2.55** Taking into account the entire legal process from initial consultation, through to the review of the objections by Cabinet and a final decision on the outcome, all of which could take between 3 to 6 months; a desktop review was carried out, using the guidance to make an informed decision of what routes would become exceptions.
- 2.56** As with all new speed limits, there will be a period of assessment following their implementation to ascertain their suitability.
- 2.57** When Welsh Government produces a revised *“Setting Local Speed Limits in Wales”*, the Council will of course, consider, and where appropriate, undertake further reviews based on the updated criteria and take any necessary and appropriate measures at that time to ensure speed limits on its local highway network are appropriate.
- 2.58** **Concern 4 – Process by Council Flawed**
- 2.59** VoGC has misdirected itself regarding the powers available under the RTRA and failed to consider adequately or at all the statutory purposes under S.1 RTRA. It has also failed to consider adequately or at all the guidance on exemptions from the default speed limit, and made proposals for exemptions without any or adequate consideration of the relevant legal framework, criteria or national guidance. It has also provided inadequate reasons and explanation for its proposals within the consultation, failing to provide the public with an opportunity for intelligent consideration and response, rendering the consultation process flawed and unlawful.
- 2.60** **Officer response 4:**
- 2.61** The proposed 30mph exceptions were reviewed in-line with the Welsh Government guidance, the criteria was applied appropriately, with further analysis undertaken where there were objections. Subsequent amendments

have been made and proposed for consideration by this Cabinet where it is felt that there is sufficient justification, these amendments are outlined within the appendices.

2.62 Objector 2 – Vale Velo Ways.

2.63 Concern 5 – Background

2.64 Wales' largest town, Barry, grew during its coal-exporting past at the end of the 1890's. Its wide avenues of Pontypridd Road and Gladstone Road are prime candidates for active travel infrastructure, but are today devoted to the movement and storage of private motor vehicles. To exempt these roads from 20mph is to entrench attitudes to movement and health of people that should be consigned to the 1990s. The Vale of Glamorgan has a historic opportunity to build a transport infrastructure that's fit for the 2090's and beyond. Had it already installed cycling infrastructure on these roads, then the exceptions could be justified; unfortunately, this has not been the case.

2.65 In this document, VVW sets out its response to the Vale of Glamorgan's "20mph Speed Limit Exceptions Consultation".

2.66 In the *Setting Exceptions to the 20mph...guidance document*, the Welsh Government sets out the process for adding exceptions to the default speed limit. In Section 2.1.3, the Government sets two Principal Questions which should be considered by highway authorities when deciding whether a 30mph exception should be made:

2.67 Question A: Are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?

2.68 If the answer to A is 'no' then an exception for a 30mph speed limit may be appropriate.

2.69 Question B: If the answer to A is 'yes', are the pedestrians and cyclists mixing with motor traffic?

2.70 If the answer to B is 'no' then a 30mph speed limit exception may be appropriate.

2.71 If the answer to B is 'yes' then a 20mph speed limit will be appropriate unless robust and evidenced application of local factors indicates otherwise.

2.72 VVW contends that in the vast majority of the 'excepted' roads across the VoG, the answer to each question is 'yes' which puts the onus on the VoG to supply robust evidence that a 30mph exception is appropriate.

2.73 Officer response 5:

- 2.74** The Council can demonstrate that the process for considering proposed exceptions to the 20mph default speed limit was carried out pursuant to the guidance provided by Welsh Government “Setting exceptions to the 20mph default speed limit for restricted roads”. Consideration was given to existing cyclist and pedestrian flows along or across any of the roads that were proposed as exception sites. From experience, local knowledge, history of road traffic collisions, composition of traffic, a determination was made to retain the proposed A and B Class exception roads at 30mph.
- 2.75** As previously advised, it is impossible to hypothesise the potential number of cyclist or pedestrian that will use a route based on perceived road safety. Perception differs from person to person and unfortunately the Welsh Government guidance did not provide any forecasting model, or formula to determine future usage.
- 2.76** If the strategic ‘A’ and ‘B’ routes were reduced to 20mph, the composition and volumes of motor traffic would potentially deter inexperienced or leisure cyclists from using those routes. However, it is acknowledged that more seasoned and experienced cyclists would use those routes, irrespective of the types and/or volume of traffic. However, it was considered that both traffic speed and volume would deter potential pedestrian and cyclist use and as most A & B Class roads carry significant volumes of traffic it was therefore deemed unlikely and improbable that reducing speed alone will increase usage on this class of road.
- 2.77** The Council receives concerns from the public where they feel it is unsafe to walk or cycle on our roads. We always investigate those concerns and if it was deemed appropriate, the Council would already have reduced those speed limits to 20mph.
- 2.78** Officers reviewing the proposed exception sites fully understood the Welsh Government guidance and applied the two-stage test accordingly. It should be noted that the Welsh Government gave no additional funding for pedestrian and traffic surveys on our strategic routes, nor did the Welsh Government provide growth factors for future cyclist and pedestrian usage based on speeds dropping to 20mph.
- 2.79** The Welsh Government guidance “Setting exceptions to the 20mph default speed limit for restricted roads” was not published until November 2022. This delay gave officers very little opportunity to undertake any quantitative assessments of cyclists and pedestrians using restricted roads that are currently 30mph. Furthermore, Welsh Government gave no additional funding for any preparatory work, including surveys.
- 2.80** Due to the delay in publishing the Guidance, officers had no option but to primarily base their exception proposals on a mixture of professional local

knowledge, collision investigations and using existing traffic surveys already held.

- 2.81** Where numerous objections were received in specific areas, officers undertook a further review and, in several cases, have made recommendations within this Report to amend the 30mph exceptions, whereby additional lengths of road will default to 20mph.
- 2.82** **Concern 6 – VoG’s justification for the TRO:**
- 2.83** VVW notes that the VoG is applying for the Traffic Regulation Orders that the VoG considers that “The Order is necessary to maintain the existing speed limits of 30mph on selected strategic roads within the County”.
- 2.84** In the WG *Exceptions* document, at Section 2.2.1. It is clear that “Decisions on exceptions should not be influenced by existing speeds”.
- 2.85** This is a clear application of *post hoc ergo propter hoc* – the presence of an existing 30mph limit is not in itself justification for keeping that limit in place and will do nothing to make the Vale a safer place for non-motorised transport.
- 2.86** **Officer response 6:**
- 2.87** It is accepted that the ‘Statement of Reasons’ provided as part of the proposed TRO was poorly worded, however, the process for considering proposed exceptions to the 20mph default speed limit was carried out pursuant to the guidance provided by Welsh Government “Setting exceptions to the 20mph default speed limit for restricted roads” and the rationale and process for setting of exceptions was well documented on the Council’s website.
- 2.88** The small numbers of 30mph exception sites on A and B Class roads are proposed where it was felt that interpretation of guidance permitted and the criteria within the guidance were not met. Local factors were taken into account when interpreting the guidance to ensure the safe and expeditious travel of motor traffic, on routes that are appropriate for being retained as 30mph.
- 2.89** **Concern 7 – Consideration of proposed Traffic Regulation Orders (TROs)**
- 2.90** VVW has examined the proposed TROs for the Vale and does not intend to challenge the validity of each one. Some of the proposed TROs in the rural Vale seem sensible – for example, T/23/106/WS on the blind bend at Llandow is a buffer to the 20mph in the village as is T/23/112/WS at Marcross on National Cycle Network Route 88.
- 2.91** Absent from the TRO plans is the section to the west of Clare Garden Village, Cowbridge at X298032 Y175007. VVW notes that this is shown on the Welsh

Government exceptions map, but is not included on the VoG's TRO Exceptions plan maps.

- 2.92** Having taken advice from Cycling UK, VVW is not satisfied with the legality of the following TROs. If they were to be implemented, the VoG will be in a weak position, were they to be contested.
- 2.93** Starting in Barry, Pontypridd Road (T/23/127/MS) and Gladstone Road (T/23/130/MS) are active travel missing links in the VoG's transport network. Both are wide roads with half their width devoted to the storage of motor vehicles. These roads give a clear yes to both of the Principal Questions, and more than one of the Place Criteria set out in the Welsh Government exceptions document. If the VoG is going to deviate from the Government Guidance, then a clear reasoned case must be given. Maintaining existing motor traffic speeds is no sufficient reason for an exemption.
- 2.94** Still in Barry, the triangle of roads south of Park Crescent (T/23/128/MS) are a clear yes to both Principal Questions, and fulfil all of the Place Criteria. VVW's objections match those for T/23/127/MS, above.
- 2.95** TRO T/23/129/MS, also in Barry, is more problematic. This is the long section from Gladstone Bridge in the north, and along Ffordd y Mileniwm from Hood Road in the west to the Docks Office in the east. Whilst segregated shared-use paths are provided in this section, the sheer numbers of actual and potential non-motorised travellers moving to and from the waterfront dwellings and the retail premises mean that the answers to both Principal Questions should be 'yes', and the VoG must address how these vulnerable road users will be protected from motor traffic travelling at speeds over 20mph. The new school at the western end of this section fulfils the 'Place' criteria. The VoG must give a clear and reasoned case as to why it intends to deviate from Government Guidance.
- 2.96** Moving out of Barry, we arrive at the A48 in St Nicholas (T/23/120/MS). The response to this proposed TRO is relatively simple – either the road has a 20mph limit, or fully segregated active travel provision is constructed. As noted elsewhere in the submission, the presence of high volumes of motor traffic does not pass the Government test for exceptions from the default 20mph. Both Principal Questions here are answered 'yes' so, again, the VoG must give a reasoned case as to why it intends to ignore Government guidance, bearing in mind that the speed and volume of motor traffic are not valid reasons for exceptions.
- 2.97** Towards Penarth and Dinas Powys, we arrive at the Merrie Harrier Junction (T/23/111/WS and T/23/109/WS). Renowned for its queuing motor traffic, these sections of road are key bottlenecks for travel from the Vale into Cardiff. The lack of active travel provision is horribly apparent to the non-motorised road user. Both Principal Questions here are answered 'yes', and again, the VoG

cannot use the contention that the speed of motorised traffic takes precedence over other modes.

- 2.98** The cynical active traveller in the Vale may feel that many of the proposed TRO exceptions have been placed at those locations which are currently most hostile to the traveller without a motor vehicle. VVW contend that the traveller would be vindicated in their feelings, especially when they arrive at Dinas Powys (T/23/110/WS). This is another key travel route – this time for travellers from Barry moving towards Cardiff. The potential number of those walking and cycling this route is hindered by volume and danger of motorised traffic – it is exactly these conditions that ‘default 20’ is intended to counter. By matching motor speed more closely to that of active travellers, potential harm is reduced. Until the proposed active travel route along this corridor is constructed, the Principal Questions require that this route cannot be exempted by use of a TRO.
- 2.99** VVW will end this submission in the western Vale. At St Brides Major (T/23/102/MS), it would appear that the existing 20mph trial is being removed. Given that this east-west link is a core corridor for active travellers, and that the answer to Principal Question A is ‘yes’, and that of Question B is also ‘yes’, VVW is keen to hear the VoG robust reasoning for removal of the current 20mph limit.
- 2.100** Into Ogmores-by-Sea (T/23/95/MS) and Southerndown (T/23/96/MS), these beautifully scenic routes are enjoyed by the motorised user as well as the active traveller.
- 2.101** Evidence amongst VVW’s membership points to the current under-use of these sections by active travellers due to the preponderance of motor traffic. Principal Question A is clearly answered in the affirmative, as is Question B. There is no question that this route should remain at default 20. Again, the presence of motor traffic does not in itself, justify an exception to that, and VVW is keen to hear the VoG’s robust defence of this exception.
- 2.102** Finally, we arrive at T/23/126/MS around Ewenny and Corntown. Part of this section is the National Cycle Network Route 88 (NCN). It almost defies belief that a TRO exception could be considered here, as the presence of the NCN in and of itself answers Principal Questions A and B before they are asked. Significant numbers of active travellers are already using this section of the Vale’s roads, with the potential for very many more with the advent of default 20. It is clear from the proposal that the VoG Council has not considered the role of the non-motorised road user in the application of these TRO exceptions across the Vale.
- 2.103 Officer response 7:**
- 2.104** The TRO includes proposed exceptions to the default 20mph speed limit along all or part of Pontypridd Road (T/23/127/MS), Gladstone Road (T/23/130/MS),

Ewenny & Corntown (T/23/126/MS), Ogmores-by-Sea (T/23/95/MS),
Southerndown (T/23/96/MS).

- 2.105** Paragraph 1.1.2 of the Welsh Government document – Setting exceptions to the 20mph default speed limit for restricted roads states: *“this guidance is intended for local interpretation by highway authorities to make evidence-based decisions on setting exceptions to the default speed limit of 20mph on restricted roads in Wales, which will come into force on 17 September 2023.”*
- 2.106** The document is not mandatory and is guidance only. Whilst it was used to consider all proposed exceptions, local knowledge and interpretation was used in the decision making process.
- 2.107** Paragraph 2.1.1 of the Document states: *“a 20mph speed limit should be set where pedestrians and/or cyclists and motor vehicles mix in a frequent manner, except where strong evidence exists that higher speeds are safe”.*
- 2.108** Welsh Government has not provided a definition, or statistical interpretation of what is “frequent”. As an adjective, the word frequent can be described as “occurring or done many times at short intervals” When applying the guidance, it was not deemed reasonable that frequent mixing was occurring in the locations identified, nor was there strong evidence of any highway safety issues with vulnerable road users.
- 2.109** Furthermore, given that the Welsh Government guidance “Setting exceptions to the 20mph default speed limit for restricted roads” was not published until November 2022, or suitable funding to undertake surveys to quantify the “frequency” of pedestrians and/or cyclists and motor vehicles mixing, officers used a combination of local knowledge, 3-year collision history involving vulnerable road users and recent surveys held.
- 2.110** Paragraph 2.1.3 of the Document outlines the two principal questions, A and B, that should be considered by highway authorities when deciding whether a 30mph exception should be made.
- 2.111** Whilst it is not a mandatory requirement to apply these questions to exceptions, they were used and considered with all of the proposed exceptions. Unfortunately, the Guidance is vague in the use of some its statements, including the use of the word “significant” or “potential”:
- 2.112** **Question A: are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?**
- 2.113** There is no definition, or statistical value of what Welsh Government deem as “significant”. Furthermore, there was no forecasting model, or increase factors in the guidance, to quantify what “potential” numbers of pedestrians and cyclists would use the road if the speeds were lower.

- 2.114** It is also noteworthy that paragraph 2.2.10 within the Place Criteria states:
“however, highway authorities continue to have the flexibility to set local speed limits that are right for individual roads, reflecting local needs and considerations”.
- 2.115** Based on officer experience of the very poor uptake in numbers using the many shared-use active travel routes provided, officer assessments were empirical.
- 2.116** It is also the case that Welsh Government guidance does not refer to ATNM anywhere within the document and it was considered that both traffic speed and volume would deter potential pedestrian and cyclist use and as most A & B Class roads carry significant volumes of traffic it was therefore deemed improbable that reducing speed alone will increase usage on this class of road.
- 2.117 Question B: if the answer to A is ‘yes’, are the pedestrians and cyclists mixing with motor traffic?**
- 2.118** Where it was felt that the mixing of pedestrians and cyclists with motor traffic justifies the route becoming 20mph, that approval was subsequently made.
- 2.119** The 20mph trial in St Brides Major (T/23/102/MS) is not going to be revoked, the majority of the route will become a default 20mph speed limit. However, there will be a 30mph from Pitcot Farm, northbound, to its junction with Southerndown Road, as this section of Wick Road does not meet the place criteria for a 20mph within the Guidance.
- 2.120** It is accepted that the A48, St Nicholas meets the place criteria and addresses principal question ‘A’ because of the presence of a limited number of residential properties fronting the road over the length of the village (Criterion 4), however, there are no other facilities or venues which meet the Place criteria within 100m of the A48. It is also the case that the A48 route is an emergency diversion route for the M4, as well as a strategic route between Bridgend and Cardiff with 40mph and National speed limit out of scope roads on both approaches to St Nicholas village.
- 2.121** The only major additional attractor which could be considered is the St Nicholas Church in the heart of the village within 100m to the north of the A48. Both the St Nicholas Church and most of the limited residential frontage and other residential areas are generally located together on the northern side of the A48 reducing the potential for local pedestrians and cyclists to mix with vehicular traffic. As such, a significant number or mixing of local pedestrians and cyclists is not considered to be substantiated locally within the village irrespective of Criterion 4 being met. There are also reasonably protected facilities in the form of footways and a controlled crossing meeting ATAG centrally located to cater for safe pedestrian movements and no highway safety issues involving vulnerable road users.

- 2.122** Based upon the above information, the reasoned and proportionate considerations and methodology in line with the interpreted of the Welsh Government Guidance referred in Officer response 2 above, it is deemed appropriate for the road to be an exception and maintained at 30mph.
- 2.123** It is proposed that further assessments will be required for the A48, St Nicholas in accordance with proposed updated guidance for “Setting Local Speed Limits in Wales”, to review and gather robust evidence to determine the mixing of pedestrians and cyclists with motor traffic and ensure that as far as reasonably practicable the speed limits on this section of the A48 are suitable for the conditions including usage.
- 2.124** Welsh Government has suggested that there could be additional funding for 2024/25 to facilitate amendments or finessing of speed limits where required. It will therefore be the Councils intention to monitor the new speed limits on all exception roads, to take onboard any future comments or concerns and determine whether changes should be made based on a revision of the existing Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.
- 2.125** Following representations from objectors, and subsequent detailed review of the exceptions criteria, it has been agreed that an additional length of Cardiff Road, Dinas Powys meeting the Place criteria should default to 20mph due to the probability of significant pedestrian and cycle mixing and the proposed 30mph exception be amended accordingly. Following a similar process, it was also agreed that St Nicholas’ Road and Park Avenue, Barry should default to 20mph and the proposed 30mph exception not be progressed. However, the 30mph exception will be retained on Broad Street (part) and Harbour Road (part) as these areas do not meet the criteria in the Guidance. These schedules within the proposed Order will be amended as outlined at Appendix ‘D’.
- 2.126 Concern 8 – Conclusion:**
- 2.127** Vale Velo Ways want to make a success of the roll out of the 20mph in the Vale of Glamorgan. To this end, please be assured of our best intentions that we are and intend to remain a trusted partner of the Vale of Glamorgan.
- 2.128 Officer response 8:**
- 2.129** It is also the Vale of Glamorgan’s intention to make a success of this Welsh Government initiative. To that end, officers have utilised the guidance and have undertaken a reasonable, reasoned, proportionate and pragmatic view of what will default to 20mph and what roads should become exceptions.
- 2.130** Welsh Government has suggested that there could be additional funding for 2024/25 to facilitate any further amendments or finessing of speed limits where required. It will be the Council’s intention to monitor the new speed limits, to

take onboard any comments or concerns and determine whether changes should be made in the future in accordance with appropriate Guidance.

2.131 Objector 3 – Harrison Grant Ring Solicitors.

2.132 Concern 9 – The Legal and Policy Framework:

2.133 Our client’s overarching position is that - in using the Guidance as a methodology - and taking local factors and circumstances into account (as the Guidance intends, see para 1.1.3), as well as ensuring local, national and international policy, which the 20mph Order is predicated on, is not undermined (para 1.2.2 and 1.2.3 of the Guidance) – the St. Nicholas Area (A48) exception contained in the Proposed TRO is not rational, consistent, or justifiable.

2.134 Officer response 9:

2.135 Paragraph 1.1.2 of the Welsh Government document – Setting exceptions to the 20mph default speed limit for restricted roads states: *“this guidance is intended for local interpretation by highway authorities to make evidence-based decisions on setting exceptions to the default speed limit of 20mph on restricted roads in Wales, which will come into force on 17 September 2023.”*

2.136 The aforementioned document is guidance only and provides a methodology to ensure a consistent approach to exceptions across Wales is taken; yet allowing for local factors and circumstances to be taken into account, which sections 2.2.12 to 2.2.17 refers.

2.137 Whilst the document was used for the consideration of all proposed exceptions, local knowledge and interpretation was used in the decision making process.

2.138 Concern 10 – Conclusion

2.139 On any proper scrutiny of the Proposed TRO within the framework which an exception to the new default speed limit can be made, an exception in relation to the St Nicholas (A48) area is not appropriate or justified.

2.140 The Guidance is clear. The two pivotal tests to make an exception, which are supplemented by additional criteria in PPW, are not satisfied. St. Nicholas (A48) clearly comes under the place criteria on the basis of the proximity of the school, and access to the school, other demands and potential demands, as well as the number of residential dwellings within the required proximity.

2.141 A ‘robust and evidenced application of local factors’ further fails to offer any support to the proposed exception.

2.142 Additionally, the Guidance requires that where there is a deviation from the 20mph default, highway authorities should have a ‘clear and reasoned case’

(paragraph 2.2.11). The Proposed TRO, with its justification for the exception based only on traffic volumes but without any elaboration or evidence cannot be considered a 'clear and reasoned case'.

2.143 Finally, policy support for the 20mph Order itself is such that exceptions to the default should be robustly justified or risk undermining the many policy reasons for its introduction as well as setting an inconsistent precedent.

2.144 Based on the above, if the Proposed TRO in respect of the St. Nicholas (A48) Area was made, the Council would fail in its duty to make 'evidence-based decisions on setting exceptions to the default speed limit of 20mph' and should therefore be refused.

2.145 Officer response 10:

2.146 Paragraph 2.1.1 states: *"a 20mph speed limit should be set where pedestrians and/or cyclists and motor vehicles mix in a frequent manner, except where strong evidence exists that higher speeds are safe"*.

2.147 The Welsh Government has not provided a definition, or statistical interpretation of what is "frequent". As an adjective, the word frequent can be described as "occurring or done many times at short intervals" When applying the guidance, it was not deemed reasonable that frequent mixing was occurring in the locations identified, nor was there strong evidence of any highway safety issues with vulnerable road users.

2.148 Furthermore, with the late publication of the Welsh Government exception Guidance , or suitable funding to undertake surveys to quantify the "frequency" of pedestrians and/or cyclists and motor vehicles mixing, officers used a combination of professional local knowledge, 3-year collision history involving vulnerable road users and recent surveys held.

2.149 Furthermore, it should be noted that there are protected facilities for pedestrians and cyclists where there is a desire to cross the A48, at defined locations, as outlined in sections 2.2.18 and 2.2.19 of the guidance.

2.150 It is also noteworthy that paragraph 2.2.10 within the Place Criteria states: *"however, highway authorities continue to have the flexibility to set local speed limits that are right for individual roads, reflecting local needs and considerations"*.

2.151 It is accepted that the A48, St Nicholas meets the place criteria and addresses principal question 'A' because of the presence of a limited number of residential properties fronting the road over the length of the village (Criterion 4), however, there no other facilities of venues which meet the Place criteria within 100m of the A48. It is also the case that the A48 route is an emergency diversion route for the M4, as well as a strategic route between Bridgend and Cardiff with

40mph and National speed limit out of scope roads on both approaches to St Nicholas village.

2.152 The only major additional attractor which could be considered is the St Nicholas Church in the heart of the village within 100m to the north of the A48. Both the St Nicholas Church and most of the limited residential frontage and other residential areas are generally located together on the northern side of the A48 reducing the potential for local pedestrians and cyclists to mix with vehicular traffic. As such, a significant number or mixing of local pedestrians and cyclists is not considered to be substantiated locally within the village irrespective of Criterion 4 being met. There are also reasonable protected facilities in the form of footways and a controlled crossing meeting ATAG centrally located to cater for safe pedestrian movements and no highway safety issues involving vulnerable road users.

2.153 Based upon the above information, the reasoned and proportionate considerations and methodology in line with the interpreted of Welsh Government Guidance referred in Officer response 2 above, it is deemed appropriate for the road to be an exception and maintained at 30mph.

2.154 It is proposed that further assessments will be required for the A48, St Nicholas in accordance with proposed updated guidance for “Setting Local Speed Limits in Wales”, to review and gather robust evidence to determine the mixing of pedestrians and cyclists with motor traffic and ensure that as far as reasonably practicable the speed limits on this section of the A48 are suitable for the conditions including usage.

2.155 The Welsh Government has suggested that there could be additional funding for 2024/25 to facilitate amendments or finessing of speed limits where required. It will therefore be the Councils intention to monitor the new speed limits on all exception roads, to take onboard any future comments or concerns and determine whether changes should be made based on a revision of the existing Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.”

2.156 **Objector 4.**

2.157 **Concern 11 – General Comments**

2.158 Reducing the speed limit from 30mph to 20mph is part of a broad raft of measures designed to reduce the carbon emissions of our transport system, to improve air quality and to enhance safety. The idea is to make roads safer for more vulnerable users, and to make streets better able to be used for purposes other than motoring.

2.159 The VoG Council, however, is proposing a set of exceptions which do not follow the WG guidance. Many of those proposed as exceptions fail should not be exceptions because the road is or could be used by pedestrians or cyclists who

have no dedicated provision. If there are or could be cyclists, the road should be 20 - regardless of its width, the traffic speed etc. The reasons invoked by VoG for exceptions are, in several cases, not criteria mentioned in the WG guidance. Others fail to meet that guidance because they are of very short sections.

- 2.160** In other words, it is unclear whether the VoG Council, in proposing some of these TROs, has identified a statutory purpose. The VoG TRO notice states:
- 2.161** 'The Order is necessary to maintain the existing speed limits of 30 mph on selected strategic roads within the County after the Welsh Government has passed legislation to implement a 20mph default speed limit in urban areas nationally throughout Wales in the interest of road safety (The Restricted Roads (20 mph Speed Limit) (Wales) Order 2022). The Council as Local Highway Authority considers that these roads are strategic routes with higher volumes of daily traffic compared to urban residential streets and as such do not meet the criteria or the nature of a road with a speed limit of 20 mph. The Council considers that the existing 30 mph speed limit is an appropriate speed limit in order to maintain a reasonable traffic flow on higher traffic volume strategic routes.
- 2.162** This rationale, however, is not something in the Act or the WG 'Guidance on setting exceptions' - though the VoG Council may feel that it should have been.
- 2.163** More than this, it appears that the following WG 'Guidance' has been ignored:
- 2.164** 'Question A: Are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?
- If the answer to A is 'no' then an exception for a 30mph speed limit may be appropriate.
- 2.165** Question B: If the answer to A is 'yes', are the pedestrians and cyclists mixing with motor traffic?
- If the answer to B is 'no' then a 30mph speed limit exception may be appropriate.
 - If the answer to B is 'yes' then a 20mph speed limit will be appropriate unless the robust and evidenced application of local factors indicates otherwise.'
- 2.166** This seems to make clear that many of the exceptions proposed should not be.
- 2.167** Those TROs to which this consultation response refers are too numerous to mention, but include:
1. Pontypridd Road (T/23/127/MS) and Gladstone Road (T/23/130/MS), Barry
 2. The triangle of roads south of Park Crescent, Barry (T/23/128/MS)

3. TRO T/23/129/MS (from Gladstone Bridge in the north, and along Ffordd y Mileniwm from Hood Road in the west to the Docks Office in the east, in Barry). Whilst there are segregated cycleways and pavements, large numbers cross the roads, and there is a school planned at the west.
4. The A48 in St Nicholas (T/23/120/MS).
5. The Merrie Harrier Junction (T/23/111/WS and T/23/109/WS).
6. The main roads through Dinas Powys (T/23/110/WS).
7. St Brides Major (T/23/102/MS) (no reason to not retain its 20 mph limit).
8. Ogmore by Sea (T/23/95/MS) and Southerndown (T/23/96/MS)
9. T/23/126/MS around Ewenny and Corntown.
- 10 Sully Area T/23/103/WS: many of the proposals are for distances that are under the 300m minimum.
11. Penarth Area T/23/109/WS, T/23/111/WS and T/23/133/MS Including Cogan Hill, Cogan Hill Roundabout, Windsor Road, Marconi Avenue, Redlands Road
12. T/23/127/MS, T/23/128/MS, T/23/129/MS, T/23/130/MS & T/23/132/MS. Many of the roads in Barry are 'normal' not exceptional, as per WG criteria.
13. T/23/113/WS. It seems preposterous that anywhere in our around Swanbridge should be 30 mph:

2.168 Comments at the Scrutiny Committee today suggest that members are more concerned to have *more* 20mph streets than they are to retain 30mph streets. It would seem that the Vale Council's work might have been rooted in a mis-perception of sentiments on this issue.

2.169 Cycling UK, which I believe will be making its own response to this consultation, is most concerned about the VoG's interpretation of WG guidance. I understand that it is considering mounting a legal challenge should these exceptions, these TROs, be confirmed.

2.170 Officer response 11.

2.171 The Welsh Government guidance "Setting exemptions to the 20mph default speed limit for restricted roads" provides a methodology to ensure a consistent approach to exceptions across Wales is taken; yet allowing for local factors and circumstances to be taken into account, or where protected facilities for pedestrians and cyclists exist.

2.172 It is accepted that the 'Statement of Reasons' provided as part of the proposed TRO was poorly worded and did not reflect the process followed in proposing the A & B Class road exceptions identified in the TRO. However, it is the case that the process for considering proposed exceptions to the 20mph default speed limit throughout the Vale (so that so that the speed limit remains at 30mph) was carried out pursuant to the guidance provided by Welsh Government "Setting exemptions to the 20mph default speed limit for restricted roads".

- 2.173** Whilst the Guidance was not referenced in the ‘Statement of Reasons’ for the TRO, it can be readily demonstrated that the rationale and process for setting of exceptions was well documented and, as such, it is considered that the council has adequately and appropriately complied with the relevant legislation and requirements in accordance with the Road Traffic Regulation Act 1984 (RTRA) when progressing the TRO and undertaking the public consultation.
- 2.174** In accordance with and following the above Guidance, all Vale A & B Class roads have been assessed using evidence from the council’s GIS data base, Google Street view (where current and appropriate) and latest collision data records as well as professional engineering judgement, local knowledge and experience in a reasonable, reasoned and proportionate methodology to demonstrate and substantiate the basis for making any exception from the default 20mph limit.
- 2.175** Paragraph 2.1.1 states: *“a 20mph speed limit should be set where pedestrians and/or cyclists and motor vehicles mix in a frequent manner, except where strong evidence exists that higher speeds are safe”*.
- 2.176** Welsh Government has not provided a definition, or statistical interpretation of what is “frequent”. As an adjective, the word frequent can be described as “occurring or done many times at short intervals” When applying the guidance, it was not deemed reasonable that frequent mixing was occurring in the locations identified, nor was there strong evidence of any highway safety issues with vulnerable road users.
- 2.177** Furthermore, given that Welsh Government guidance “Setting exceptions to the 20mph default speed limit for restricted roads” was not published until November 2022, or suitable funding to undertake surveys to quantify the “frequency” of pedestrians and/or cyclists and motor vehicles mixing, officers used a combination of local knowledge, 3-year collision history involving vulnerable road users and recent surveys held.
- 2.178** Paragraph 2.1.3 outlines the two principal questions, A and B, that should be considered by highway authorities when deciding whether a 30mph exception should be made.
- 2.179** Whilst it is not a mandatory requirement to apply these questions to exceptions, they were used and considered with all of the proposed exceptions. Unfortunately, the guidance is vague in the use of some its statements, including the use of the word “significant” or “potential”:
- 2.180** **Question A: are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?**

- 2.181** There is no definition, or statistical value of what Welsh Government deem as “significant”. Furthermore, there was no forecasting model, or increase factors in the guidance, to quantify what “potential” numbers of pedestrians and cyclists would use the road if the speeds were lower.
- 2.182** It is also noteworthy that paragraph 2.2.10 within the Place Criteria states: *“however, highway authorities continue to have the flexibility to set local speed limits that are right for individual roads, reflecting local needs and considerations”*.
- 2.183** Based on officer experience of the very poor uptake in numbers using the many shared-use active travel routes provided, officer assessments were empirical.
- 2.184** **Question B: if the answer to A is ‘yes’, are the pedestrians and cyclists mixing with motor traffic?**
- 2.185** Where it was felt that the mixing of pedestrians and cyclists with motor traffic justifies the route becoming 20mph, that approval was subsequently made.
- 2.186** It is accepted that the A48, St Nicholas meets the place criteria and addresses principal question ‘A’ because of the presence of a limited number of residential properties fronting the road over the length of the village (Criterion 4), however, there no other facilities of venues which meet the Place criteria within 100m of the A48. It is also the case that the A48 route is an emergency diversion route for the M4, as well as a strategic route between Bridgend and Cardiff with 40mph and National speed limit out of scope roads on both approaches to St Nicholas village.
- 2.187** The only major additional attractor which could be considered is the St Nicholas Church in the heart of the village within 100m to the north of the A48. Both the St Nicholas Church and most of the limited residential frontage and other residential areas are generally located together on the northern side of the A48 reducing the potential for local pedestrians and cyclists to mix with vehicular traffic. As such, a significant number or mixing of local pedestrians and cyclists is not considered to be substantiated locally within the village irrespective of Criterion 4 being met. There are also reasonable protected facilities in the form of footways and a controlled crossing meeting ATAG centrally located to cater for safe pedestrian movements and no highway safety issues involving vulnerable road users.
- 2.188** Based upon the above information, the reasoned and proportionate considerations and methodology in line with the interpreted of the Welsh Government Guidance referred in Officer response 2 above, it is deemed appropriate for the road to be an exception and maintained at 30mph.
- 2.189** It is proposed that further assessments will be required for the A48, St Nicholas in accordance with proposed updated guidance for “Setting Local Speed Limits

in Wales”, to review and gather robust evidence to determine the mixing of pedestrians and cyclists with motor traffic and ensure that as far as reasonably practicable the speed limits on this section of the A48 are suitable for the conditions including usage.

2.190 Welsh Government has suggested that there could be additional funding for 2024/25 to facilitate amendments or finessing of speed limits where required. It will therefore be the Councils intention to monitor the new speed limits on all exception roads, to take onboard any future comments or concerns and determine whether changes should be made based on a revision of the existing Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.”

2.191 Following representations from objectors, and subsequent detailed review of the exceptions criteria, it has been agreed that St Nicholas’ Road and Park Avenue, Barry should default to 20mph due to the probability of significant pedestrian and cycle mixing and the proposed 30mph exception not be progressed. However, the 30mph exception will be retained on Broad Street (part) and Harbour Road (part) as these areas do not meet the criteria in the Guidance. The schedule within the proposed Order will be amended as outlined at Appendix ‘D’.

2.192 Objector 5 – Llangan Community Council.

2.193 Concern 12 – Llangan Area, T/23/65/WS

2.194 We welcome these changes.

2.195 Additionally, we would propose extending the 20mph Traffic Order along the un-names road through the centre of the village of Llangan, from the junction with Twchwch Garth eastwards to the junction with Cwrt Canna. The reason for this is to provide safety for pedestrians, runners, dog-walkers, cyclists and horse-riders who regularly use these lanes. We note that these users who wish to walk, cycle or ride, including pupils of Llangan school who wish to use active travel to get to school, are currently denied this opportunity because the road is narrow and unsafe. We believe this is an excellent opportunity to extend the speed limit now to create opportunities for people who wish to use active travel to safely commute to the school and further to Llangan and St. Mary Hill Village Hall. They are currently unable to do so. This proposal extends to drawing T/23/65/WS.

2.196 We also propose a second extension of the speed limit from Llangan and St Mary Village Hall to the national speed limit at the end of Heol Lidiard. This would encourage safe driving past the entrance to the village hall and near Heol Lidiard.

2.197 Officer response 12.

- 2.198** The un-named road between Twchwyn Garth and Cwrt Canna is out of scope as it is derestricted i.e., it is not subject to 30mph by virtue of street lighting and will not form part of the Welsh Government default of 20mph.
- 2.199** The section of road fronting Heol Lliardiard is subject to a speed limit of 40mph by traffic regulation order, as a consequence this road is also out of scope and will not default to 20mph and would need to be amended by Order in the future subject to review in accordance with relevant Guidance as well as budget and resource availability.
- 2.200** Welsh Government is in the process of updating its guidance for “Circular No: 24/2009 - Setting Local Speed Limits in Wales”. The Council will monitor and undertake reviews of roads within its local highway network where concerns are identified or as considered appropriate in the future based on the updated guidance when published by Welsh Government, and take appropriate measures to ensure that as far as reasonably practicable that the speed limits are suitable for the conditions, the needs of the local community and consistent with its published policy objectives. Any request for future changes to speed limit will be subject to budget and resource availability at that time.
- 2.201 Concern 13 – Llangan Area, T/23/66/WS**
- 2.202** We welcome these changes.
- 2.203** Additionally, we would propose extending the 20mph Traffic Order along the un-named road through the centre of the village of Llangan, from the junction with Twchwch Garth eastwards to the junction with Cwrt Canna. The reason for this is to provide safety for pedestrians, runners, dog-walkers, cyclists, and horse-riders who regularly use these lanes. We note that these users who wish to walk, cycle or ride, including pupils of Llangan school who wish to use active travel to get to school, are currently denied this opportunity because the road is narrow and unsafe. We believe this is an excellent opportunity to extend the speed limit now to create opportunities for people who wish to use active travel to safely commute to the school and further to Llangan and St. Mary Hill Village Hall. They are currently unable to do so. This proposal extends to drawing T/23/65/WS.
- 2.204** We also note that the road from Ruthin to Pentre Meyrick is busy, and the traffic includes many lorries travelling along it, despite the road not being wide enough for them. Although the road currently included 30 and 40mph limits, traffic continues to speed, even past the school. We doubt that this will change when the limit is reduced to 20mph in the proposed sections. We believe that further action to control traffic will be required and would welcome further discussions about it.
- 2.205 Officer response 13.**

- 2.206** The un-named road between Twchwyn Garth and Cwrt Canna is out of scope for this project, as it is not a restricted road i.e., it is not subject to 30mph by virtue of street lighting and will not form part of the Welsh Government default of 20mph.
- 2.207** The comments regarding volume of traffic along the route between Pentre Meyrick and Ruthin is noted. However, it needs to be borne in mind that the route is a classified and unnumbered road, formerly a 'C' class route. As such, its use by HGVs is to be expected. Any engineering measures will be subject to a collision analysis and if found to be of concern, will compete with other similar schemes for funding.
- 2.208** The camera partnership currently enforce the area and residents have been advised to contact GoSafe for increased enforcement and/or setting up a community speed watch group.
- 2.209** Welsh Government is in the process of updating its guidance for "Circular No: 24/2009 - Setting Local Speed Limits in Wales". The council will monitor and undertake reviews of roads within its local highway network where concerns are identified or as considered appropriate in the future based on the updated guidance when published by the Welsh Government and take appropriate measures to ensure that as far as reasonably practicable that the speed limits are suitable for the conditions, the needs of the local community and consistent with its published policy objectives. Any request for future changes to speed limit will be subject to budget and resource availability at that time.
- 2.210 Concern 14 – Treoes Area, T/23/121/MS**
- 2.211** We welcome these changes.
- 2.212** Additionally, we would propose extending the 20mph along Pant Ruthin Fach Lane from Yr Efail, to the crossroads at Ty Candy Farm, westwards to Moor Mill Farm and then southwards from Moor Mill Farm to what will be the 20mph limit at the entrance to Treoes near the bridge across Nant Canna. The reason for this is to provide safety for pedestrians, runners, dog-walkers, cyclists and horse-riders who regularly use these roads as a circular walk around the village. We note that there are entrances to houses and the fishing club along these lanes also. Extending the 20mph limit to these lanes would remove the inequality in the improvement in safety for those householders and users which would arise if this were not done, and provide safe access for all users.
- 2.213** We also proposed a second extension of the 20mph limit along the unnamed road from the Star Inn to Ton Ty-Du. We suggest this order is extended southwards along the road, past the current allotments to the position of the current traffic sign which is situated about half-way along the road towards Greenfields. This is vital to warn drivers of the need to drive slowly and carefully along the narrow lane as they approach the entrance to the village, where

pedestrians are entering the allotments, the chapel and heritage hub, as well as cars turning into and out of the junction leading to Llangan.

2.214 Officer response 14.

2.215 The following sections of highway are out of scope for this project as they are not restricted roads i.e., are not subject to 30mph by virtue of street lighting and will not form part of the Welsh Government default of 20mph.

- Pant Ruthin Fach Lane – from Yr Efail to Ty Candy Farm.
- Ty Candy Farm to Moor Mill Farm.
- Moor Mill Farm to Treoes.
- The Star Inn to Ton Ty-Du (from its junction leading to Llangan village to Greenfields).

2.216 The Welsh Government is in the process of updating its guidance for “Circular No: 24/2009 - Setting Local Speed Limits in Wales”. The Council will monitor and undertake reviews of roads within its local highway network where concerns are identified or as considered appropriate in the future based on the updated guidance when published by the Welsh Government and take appropriate measures to ensure that as far as reasonably practicable that the speed limits are suitable for the conditions, the needs of the local community and consistent with its published policy objectives. Any request for future changes to speed limit will be subject to budget and resource availability at that time.

2.217 Concern 15 – Impact of Proposed Changes on other Rural Roads.

2.218 Lastly, we would like to understand the impact that these proposals will have on the volume of traffic travelling through the villages of Llangan, Treoes and St Mary Hill. Currently, the villages are used as “short-cuts” by commuters who are guided by their sat-navs. These devices do not take into consideration the actual conditions of the environment and the state of these roads, only the routes and speed limits. We are concerned that dropping the speed limit in some areas will result in drivers being routed along other, country lanes, thereby creating undesirable consequences of increased traffic on narrow and unsuitable roads. We would like to see the modelling that has been done around this and understand the impact.

2.219 Officer response 15:

2.220 The 20mph default on restricted roads is a Welsh Government initiative, where their legislation for the changes came into force on 12th July, 2022. Any concerns, or queries, relating to the consequential effects of imposing 20mph limits in rural villages and any modelling work to ascertain, or mitigate its impacts on adjacent country roads is a matter for the Welsh Government.

- 2.221** The remit of Welsh Councils is to facilitate the necessary changes to signs and lines associated with the change to the new default 20mph speed limit, as well as creating 30mph exceptions that would not be appropriate for 20mph in accordance with Guidance provided and published by the Welsh Government.
- 2.222 Objector 6 – Councillor Ian Perry**
- 2.223 Concern 16 – Inaccuracies with the TRO.**
- 2.224** As I stated at the briefing for elected members, there has been a lack of engagement and partnership with elected members and utilisation of local knowledge. This is evidenced in the TRO for Kingsland Lane, St Nicholas. There is no Kingsland Lane in St Nicholas. Further, St Nicholas CIW Primary School is located on two sites. The small school isn't a private nursery as suggested at the Environment and Regeneration scrutiny committee meeting, and if it was it would probably count towards requiring a 20mph speed limit. The distance between the primary school and Cowbridge Road (A48) is the distance from the nearest gate of the school directly to the road and this is 79m – physically measured with a trundle wheel in St Nicholas, rather than using GIS at a desk somewhere away from St Nicholas.
- 2.225 Officer response 16.**
- 2.226** Ward Members and Community/Town Councils were informally advised and consulted on the proposals at various key stages of scheme development. Feedback was taken onboard, with further amendments made where necessary prior to the statutory consultation.
- 2.227** Contrary to Councillor Perry's comments, Kingsland Lane does exist and has the unique Street Reference Number (USRN) 41501591. The Lane extends from the A48, adjacent to the property known as Trehill, through to the property known as Kingsland Coach House.
- 2.228** The Place criteria in the Welsh Government exceptions Guidance refers to any educational setting (e.g., primary, secondary, further education and higher education) within a 100m walk of the road being considered for an exception – Criterion 1. The site of the St Nicholas Church in Wales Primary School measures 135m west along School Lane to the A48 and 141m east through the main village to exit by between Westways and the Old Post office using the measuring tool on the council's GIS system and therefore is outside the scope of the Place criteria.
- 2.229** It is accepted that the Old Church in Wales School within St Nicholas Village is within 100m of the A48 and there was some confusion over the usage of the site when discussed with Cllr Perry at the Scrutiny Committee meeting. However, the Council's Education Department have subsequently clarified that the building is being used as temporary accommodation for education purposes for

4 and 5 year olds until October this year when the new school building on the main St Nicholas Church in Wales Primary School site opens.

2.230 Based upon the buildings short-term usage as an educational facility it is considered appropriate to apply local factors to the Place criteria and therefore as the use will cease after October it is considered that the Criterion 1 of the Place criteria is not met.

2.231 Concern 17 – Promotion of the consultation.

2.232 The inaccuracies in the TRO are disappointing and disadvantage members of the public wishing to participate in the consultation. Whilst the promotion of the consultation might have ticked boxes, the first and only notification on Facebook was on July 14.

2.233 Whilst there was a news item with a link to the consultation at the bottom of the home page of the website, this wasn't very clear, and few people will go to the council website to get their council news.

2.234 Neither myself nor my wards' Community Councils promoted the consultation – the social media posts appeared too late to share.

2.235 Clear reasoning for the proposed exemptions and supporting evidence for exemptions was not given to members of the public. This made their task on contributing to the consultation in a meaningful way very difficult.

2.236 Officer response 17.

2.237 An advert giving public notice of the proposals was provided in the South Wales Echo dated 22nd June, 2022, with documents deposited in the Civic Offices for inspection and online through the Council's consultation webpage. A dedicated webpage providing detailed information on the 20mph Speed Limit Exceptions Consultation, including full schedules and plans and linking to the Council's consultation webpage was also created. The publication and noticing for the TRO complied in full with the council obligations in accordance with The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996.

2.238 Ward Members and Community/Town Councils were made aware of the Council's intention to advertise the proposals and if Councillors wished to promote the consultation, then this could have been discussed at one of the presentation sessions held to discuss this default 20mph speed limit proposal or raised with officers at any time.

2.239 The 20mph default on restricted roads is a Welsh Government project, which was further highlighted to the public through television advertising, news articles and social media outlets. The public would have been given sufficient

notification and understanding of what the overarching proposals were and when the 20mph default was due to be implemented.

2.240 The proposals were quite clear on the accompanying schedule and drawings provided as part of the TRO, which could then be compared to the default 20mph on Data Map Wales. The consultation was extended from the statutory 21 day period and took place over a period of 28 days between Wednesday 22nd June to midnight on Thursday 19th July, 2023, which gave ample opportunity for anyone to approach the Council and seek clarity on any part of the proposals.

2.241 Concern 18 – Collisions and 30mph Exceptions

2.242 I am surprised that the injury collisions that have been recorded by the police at the junction of Station Road and Cardiff Road in Dinas Powys have not been considered when looking at roads for exemption. I'm also surprised that Cardiff Road is proposed for exemption outside Eastbrook and Dinas Powys Railway Stations – when the Vale Council should be promoting walking and cycling to the railway stations.

2.243 The road through Ystradowen is exempted. Is there no possibility that children might cycle to meet their friends within the village should the speed limit be defaulted to a safe speed?

2.244 Officer response 18.

2.245 Following representations from objectors, and subsequent detailed review of the exceptions criteria, it has been agreed that an additional length of Cardiff Road, Dinas Powys meeting the Place criteria should default to 20mph due to the probability of significant pedestrian and cycle mixing and the proposed 30mph exception be amended accordingly. The schedule within the proposed Order will be amended as outlined at Appendix 'D'.

2.246 I would refer Cabinet to Officer response 2 regarding the Council's considerations and interpreted of the Guidance provided by Welsh Government for "Setting exceptions to the 20mph default speed limit for restricted roads".

2.247 The A4222, Ystradowen meets the Place criteria and addresses principal question 'A' because of the presence of a Village Hall (Criterion 2) within 100m of the Cowbridge Road, however, there is minimal direct residential frontage (Criterion 4) with most dwellings being access from sideroads and therefore Criterion 4 of the Place criteria is not met. It is also the case that the A4222 is a strategic route between Rhondda Cynon Taff and the Vale of Glamorgan with 40mph and National speed limit out of scope roads on both approaches to the village.

- 2.248** The only additional attractor is the White Lion public house within 100m of Cowbridge Road and, as such, it is considered that a significant numbers or mixing of pedestrians and cyclists is not substantiated by the venues locally within the village irrespective of Criterion 2 being met. There are also good, protected facilities in the form of footways and a controlled crossing meeting ATAG generally on the desire line to the village hall and public house to cater for safe pedestrian movements and no highway safety issues involving vulnerable road users.
- 2.249** Paragraph 1.1.2 of the Welsh Government Guidance states: “this guidance is intended for local interpretation by highway authorities to make evidence-based decisions on setting exceptions to the default speed limit of 20mph on restricted roads in Wales, which will come into force on 17 September 2023.
- 2.250** Paragraph 2.1.1 states: “a 20mph speed limit should be set where pedestrians and/or cyclists and motor vehicles mix in a frequent manner, except where strong evidence exists that higher speeds are safe”.
- 2.251** Paragraphs 2.2.18 states – exceptions may be appropriate where there is significant demand (or potential demand) for walking and cycling so long as the highway authority is satisfied that the answer to Principal Question B is ‘no’ (see 2.1.3) and that people on foot and cycle are not required to mix with motor traffic.
- 2.252** It is also noteworthy that paragraph 2.2.10 within the Place Criteria states: “however, highway authorities continue to have the flexibility to set local speed limits that are right for individual roads, reflecting local needs and considerations”.
- 2.253** Welsh Government Guidance document is not mandatory and is guidance only. Whilst it was used to consider all proposed exceptions, local knowledge and interpretation was used in the decision-making process. Based upon the above information, the reasoned and proportionate considerations, and methodology, it is deemed appropriate for the road to be an exception and maintained at 30mph.
- 2.254** It is proposed that further assessments will be required for the A4222, Ystradowen post the 20mph implantation in accordance with proposed updated guidance for “Circular No: 24/2009 - Setting Local Speed Limits in Wales”, to review and gather robust evidence to determine the mixing of pedestrians and cyclists with motor traffic and ensure that as far as reasonably practicable the speed limits on this section of the A48 are suitable for the conditions including usage.
- 2.255** Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate amendments or finessing of speed limits where required. It will therefore be the Councils intention to monitor the new speed limits on all

exception roads, to take onboard any future comments or concerns and determine whether changes should be made based on a revision of the existing Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.”

2.256 Concern 19 – Place Criteria and Principal Questions.

2.257 St Nicholas does meet the place criteria set by the Welsh Government guidance due to the proximity and access to the school. Further, Planning Policy Wales 11 suggests that other key buildings within the village also contribute to the Place Criteria. The footways within St Nicholas are narrow, offering little protection for people walking through the village. The footways are busy with people walking their dogs, accessing the school, visiting friends and rambling the many public rights of way that link the historic church and graveyard with Tinkinswood, Duffryn Gardens, other villages and offer great views for wellbeing and good exercise for health.

2.258 So, in relation to St Nicholas:

2.259 Question A: Are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?

2.260 YES. The A48 is a well-known route for cycling clubs and increasingly brave day-trippers and tourists. We even have some equestrians. Residents of Cae Newydd and Campbell Court must walk the narrow footway to reach the bus stops and Village Green. In reverse, residents of the older parts of St Nicholas must walk the narrow footways to reach the equipped play area at Cae Newydd. The footways of St Nicholas are already well used despite the proximity of the busy road and noise pollution.

2.261 Question B: If the answer to A is ‘yes’, are the pedestrians and cyclists mixing with motor traffic?

2.262 YES. There are only narrow footways and just one crossing. A lack of a controlled crossing is of particular concern by Chapel Lane, Trehill, by School Lane and by Cae Newydd (a popular footpath is across the road). Duffryn Lane provides a relatively safe cycling route – once residents reach it. Cycling Clubs use the A48 for training.

2.263 The Welsh Government guidance states:

2.264 If the answer to B is ‘yes’ then a 20mph speed limit will be appropriate unless the robust and evidenced application of local factors indicates otherwise.

2.265 The proximity of the school, Station House Health & Wellbeing, church and chapel, plus the number of dwellings, including the historic Blacksmiths Row and Church Hall House firmly put St Nicholas as necessitating a 20mph speed limit.

- 2.266** Transport for Wales and the Highway Authority haven't identified St Nicholas Church in Wales Primary School correctly and therefore cannot claim to have robustly evidenced local factors that might exempt Cowbridge Road.
- 2.267** St Nicholas was identified in the Welsh Governments Noise and soundscape action plan a decade ago for 'Priority Action' to reduce road noise pollution. The pollution is now worse due to the new A4226 bringing more traffic through the village – particularly large vehicles.
- 2.268** Lower traffic speeds reduce noise pollution.
- 2.269** Much more detailed reason for not exempting St Nicholas from the 20mph rollout are provided in the response to this consultation submitted on behalf of St Nicholas with Bonvilston Community Council.
- 2.270** I am aware that residents of Bonvilston, Llancarfan, Llantrithyd, Llanbethery, The Drope and St Georges are keen to have their speed limits reviewed.
- 2.271 Officer response 19.**
- 2.272** It is accepted that the A48, St Nicholas meets the place criteria and addresses principal question 'A' because of the presence of a limited number of residential properties fronting the road over the length of the village (Criterion 4), however, there no other facilities of venues which meet the Place criteria within 100m of the A48. It is also the case that the A48 route is an emergency diversion route for the M4, as well as a strategic route between Bridgend and Cardiff with 40mph and National speed limit out of scope roads on both approaches to St Nicholas village.
- 2.273** The only major additional attractor which could be considered is the St Nicholas Church in the heart of the village within 100m to the north of the A48. Both the St Nicholas Church and most of the limited residential frontage and other residential areas are generally located together on the northern side of the A48 reducing the potential for local pedestrians and cyclists to mix with vehicular traffic. As such, a significant number or mixing of local pedestrians and cyclists is not considered to be substantiated locally within the village irrespective of Criterion 4 being met. There are also reasonable protected facilities in the form of footways and a controlled crossing meeting ATAG centrally located to cater for safe pedestrian movements and no highway safety issues involving vulnerable road users.
- 2.274** It is also noteworthy that paragraph 2.2.10 within the Place Criteria states: "however, highway authorities continue to have the flexibility to set local speed limits that are right for individual roads, reflecting local needs and considerations".

- 2.275** Based upon the above information, the reasoned and proportionate considerations and methodology in line with the interpreted of the Welsh Government Guidance referred in Officer response 2 above, it is deemed appropriate for the road to be an exception and maintained at 30mph.
- 2.276** It is proposed that further assessments will be required for the A48, St Nicholas in accordance with proposed updated guidance for “Circular No: 24/2009 - Setting Local Speed Limits in Wales”, to review and gather robust evidence to determine the mixing of pedestrians and cyclists with motor traffic and ensure that as far as reasonably practicable the speed limits on this section of the A48 are suitable for the conditions including usage.
- 2.277** Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate amendments or finessing of speed limits where required. It will therefore be the Councils intention to monitor the new speed limits on all exception roads, to take onboard any comments or concerns and determine whether future changes should be made based on a revision of the existing Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.
- 2.278** For the reasons explained in Officer response 16, it is considered appropriate to apply local factors to the Place criteria in relation to educational settings – Criterion 1 and therefore the Place criteria is not met. The other locations referred by Cllr Perry including the Station House Health & Wellbeing, the church and chapel, the historic Blacksmiths Row and Church Hall House are not identified as premises within the Place criteria in the Welsh Government Guidance. Furthermore, traffic speed is specifically excluded as a consideration within the Welsh Government Guidance and there is no mention of noise pollution as a material consideration.
- 2.279** For further details and background relating to the reasoned and proportionate decision to identify the A48, St Nicholas as an exception to the default 20mph refer to responses 9, 10 and 11 above.
- 2.280** **Objector 7 – Friends of the Earth.**
- 2.281** **Concern 20 – Short Lengths of 30mph Exceptions.**
- 2.282** *We have identified a number of 20mph ‘exception roads’ in the Vale of Glamorgan in line with the Welsh Government exceptions criteria.*
- 2.283** Mr Clogg admitted at 18th July Scrutiny that this is “inaccurate” and could mislead the public, offering an apology “to that extent”.
- 2.284** We cited the proposals for 30mph “buffer zones” as transition from 40mph; these do not “simplify signing” as stated, but make it more complicated, confusing and costly. WGovt guidance (2.2.20-21) says these zones should be

300 metres minimum in length, but we see several of these exceptions are about 100metres or shorter.

- 2.285** Mr Clogg denied this, saying he's "confident" none are below the 300metre standard. In the Annex, we reproduce the details for the nine 30-mph buffers at the Merrie Harrier, Hayes Rd roundabout (Sully) and Swanbridge crossroad. All nine are below the 300metre standard. We see likewise three in Ewenny and three in Fonmon (Annex).
- 2.286** Mr Clogg gave the Committee false information, as he did for the public. All the buffer 'exceptions' listed in the ANNEX below should be withdrawn.
- 2.287** The buffer 'exceptions' proposed at the Merrie Harrier turns to Llandough and Penarth have no rationale, as most of the motor traffic is slowed or stopped by the Traffic lights. Turning traffic is slowed and has to accelerate uphill to reach 30mph. To then reduce to 20mph after 60 or 100 metres is wasteful and polluting. Coming into the junction, nearly all traffic has to stop at the traffic lights, so speeding up to 30mph into the lights is pointless and risky to cyclists trying to reach the ASL Box ahead of the queue.
- 2.288** 30mph traffic is similarly hazardous to cyclists down Harbour Rd hill, as they have to reach the centre lane to proceed to the Knap or to the segregated cycleway on the Causeway. Cars filtering left along the Causeway tend to cut-up cyclists. It's a bad design - they could have built a segregated lane down the centre of this wide road – so now it's there, let's exclude the 30mph exception.
- 2.289 Officer response 20.**
- 2.290** The only 20mph speed limits being proposed are those that provide a small extension to existing default 20mph areas. The reason for this is to ensure that the 20mph terminal signs are in locations where they are easier to locate, have better visibility, or are at the locations of existing 30mph terminal signs that will become 20mph. There are no 20mph exceptions being proposed as part of this Traffic Regulation Order.
- 2.291** The objector is correct that the Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales states that *"The minimum length of a speed limit should generally be not less than 600 metres to avoid too many changes along the route. This can be reduced to 400 metres for lower speed limits, or even 300 metres on roads with a purely local access function. Anything shorter is not recommended"*. Whilst consideration was given to ensuring the minimum length of 30mph exceptions met the Setting Local Speed Limits guidance, unfortunately, there were limited instances where this could not be achieved due to site conditions, forward visibility, or looking to utilise existing 30mph sign locations.

- 2.292** Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate amendments or finessing of speed limits where required. It will therefore be the Council's intention to monitor the new speed limits on all exception roads, to take onboard any future comments or concerns and determine whether changes should be made based on a revision of the existing Welsh Government Circular No: 24/2009 – "Setting Local Speed Limits in Wales."
- 2.293** The 30mph exceptions approaching the Merrie Harrier junction are not 'buffer zones', they are lengths of 30mph speed limits that form an entry point into a 30mph area, which is ostensibly A4055, Cardiff Road. The 'Officer response 22' below provides clarification and rationale on the individual roads raised in 'Concern 22 – Conclusion' as being below the recommended 300m length limit in Welsh Government Circular No: 24/2009.
- 2.294** Following representations from objectors, and subsequent detailed review of the exceptions criteria, it has been agreed that St Nicholas' Road and Park Avenue, Barry meeting the Place criteria should default to 20mph due to the probability of significant pedestrian and cycle mixing and the proposed 30mph exception not be progressed. However, the 30mph exception will be retained on Broad Street (part) and Harbour Road (part) as these areas do not meet the criteria in the Guidance. The schedule within the proposed Order will be amended as outlined at Appendix 'D'.
- 2.295** **Concern 21 – Principal Questions.**
- 2.296** **Systematic consideration of the key two-stage test** in the WG guidance was needed in deriving the TROs:
- 2.297** **Question A:** Are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?
- 2.298** *If the answer to A is 'no' then an exception for a 30mph speed limit may be appropriate.*
- 2.299** **Question B:** If the answer to A is 'yes', are the pedestrians and cyclists mixing with motor traffic.
- 2.300** If the answer to B is 'no' then a 30mph speed limit exception may be appropriate.
- 2.301** If the answer to B is 'yes' then a 20mph speed limit will be appropriate unless the robust and evidenced application of local factors indicates otherwise.
- 2.302** Mr Clogg waffled over the interpretation of "significant" and did not show they had made a "robust and evidenced application of local factors". Though safety measured by local accident rates is a key objective, he showed they had not taken safety into account, in denying the accident rate at the Dinas Powys

Station Road junction was relevant (to Cllr Perry's question).

2.303 *Little regard to Place criteria (2.2.28)*

1. Within a 100m walk of any educational setting (e.g. primary, secondary, further education and higher education)
2. Within 100m walk of any community centre
3. Within 100m walk of any hospital
4. Where the number of residential and/or retail premises fronting a road exceeds 20 properties per km.

2.2.9 Sections of road which meet any of these Place criteria should be considered to positively answer principal question A as set out above

2.304 No data relating to the above criteria have been compiled.

2.305 When talking of Jenner Rd, Mr Clogg said they'd thought of the number of schoolchildren, but not the 100m distance exclusion from each school or the number of properties fronting the road, which far exceeds 20 /km.

2.306 They haven't considered Lavernock Rd being within 100m of Brockhill Community Centre and Cosmeston Park (which should come in that category). They haven't considered the nurse school (SureStart Centre) on Gladstone Rd; the YMCA community centre close to Gladstone Rd or the Palmerston Adult Education Centre on Cardiff Road.

2.307 Windsor Rd Cogan, has Cogan Leisure Centre (in the Community Centre category) within 100m and many more than 20/km residential premises fronting the road.

2.308 In the discussion of St Nicholas Rd/Park Avenue at the Committee, Mr Clogg never mentioned that many more properties than 20/km front onto the roads. His proposal to exempt these roads was based on a "feeling" and "belief" on whether the number of users is "significant".

2.309 Pontypridd Road B4266 cannot have an 'exception' because the number of homes per km well exceeds 20 on both sides and its cycle-route has no segregation.

2.310 Gladstone Rd has sparse premises fronting it below the Court Rd junction; however, the YMCA "community centre" is off it, with Court Rd entrance less than the 100metre criterion. There are no defined crossings for the two bus stops. A cycle-route crosses it. The section between Court Rd and Tynewydd Road is excluded by the SureStart nursery school and houses fronting it at over 20 /km both sides. The Court Rd junction has the Court Rd and Gladstone Rd cycleways through it where cyclists seriously "mix with traffic". Likewise pedestrians crossing the limbs of the roundabout. Thus the 'Place' criteria exclude the 'exception' for Gladstone Rd.

- 2.311** Along Cardiff Road to Palmerston Road, there's 20 homes etc per km including Churchill Terrace, then on the Lennox Green to Laura St. section. Palmerston Adult Ed Centre is here too. The bus stop has no associated crossover; pedestrians and cyclists mix with the traffic at the Palmerston Rd lights. The lack of defined crossing points on this section for reaching the shop and homes breaches the criterion on no mixing with 2-way traffic. The section east of Laura Street has few premises fronting but many behind (Ty Verlon complex). There's no crossing point for the Bus stop near McDonalds. The council plans an off-road cycleway on the Cardiff Road, so evidently considers the current or future demand for this is "significant". It's currently an on-road 'future' cycleway - once an off-road segregated cycleway is built, the question of the speed limit can be revisited. Cyclists at present have to mix with traffic at the major Biglis (McDonalds) roundabout, then to and from Dinas Powys.
- 2.312** Gladstone Bridge has deficient connections for cyclists at both ends (roundabouts), breaching the requirement that pedestrian and cyclists do not mix with motor traffic.
- 2.313** Millenium Way from Gladstone Bridge to the Docks Office: has homes fronting the road at over 20 per km. It also serves the Bridge Between community centre and the Waterfront Medical Centre. These local factors prevent it having an exemption. Millenium Way to Hood Road comes within 100m of the Sant Baruc primary school – with schoolchildren walking to the eat Waterfront homes. It cannot have an exemption.
- 2.314** *The VoG has no supporting evidence*
- 2.315** FoE asked for supporting evidence 2 weeks ago, but Mr Clogg offered none. We see from the Scrutiny discussion that he and his colleagues came to their "belief" without compiling any evidence. They failed to make *the robust and evidenced application of local factors* that the guidance requires in key Question B. We consider this proves the website statement was not just inaccurate but false. Mr Clogg had no body of evidence to give the support that is essential under Question B for the 'exemptions' proposed in Barry, Sully Dinas Powys, Penarth and Llandough, perhaps not elsewhere.
- 2.316** *No account of cycling routes*
- 2.317** Mr Clogg denied at Scrutiny there are any relevant "designated" cycle-routes so he's not taken them into account. He's wrong.
- 2.318** The Active Travel Network Maps (ATNM) is statutory combining the Existing Routes Map and the Integrated Network Map required by the Act. This combination of **existing routes** and **future routes** is to be reviewed every 3 years (ATNM s. 10.1.1). These routes must connect to destinations and could be on road, shared, separated, or motor-traffic free. Routes can be for walkers or cyclists, or both. Maps are also to show crossing points.

2.319 The Vale cycle-routes are very largely “future” in the sense that they need improving to bring them up to standards. They are of course already used for cycling, with many being defined and provided with Advanced Stop Lines under previous programmes.

2.320 The “Future routes” are fully included in the integrated network (ATNM s.10.8), so Mr Clogg was wrong to deny they exist and ignore them in the TRO process.

2.321 *The presence of an Active Travel route: answers ‘yes’ to Question A*

2.322 In defining and confirming a route, the responsible officers decided there are significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road. Mr Clogg’s team were out-of-order to reach a decision on a feeling or belief on ‘significant’ numbers. All the exceptions at issue in Barry and the east Vale are on Active Travel network routes.

2.323 *An ‘exception’ depends on the answer to Question B being – ‘no’*
ie. that people on foot and cycle are not required to mix with motor traffic (s.2.2.18)

2.324 2.2.19 says: This would require protected facilities to be provided for pedestrians and cyclists which meet the ATAG**, in particular:

- there are footways in accordance with Section 9.6 of the ATAG on the side(s) of the road fronted by development or to provide necessary connectivity [1].
- any demand for pedestrian and cycle crossing movements mainly takes place at defined locations, which are provided with facilities in accordance with Section 12.3 of the ATAG; or alternatively there is no requirement for people on foot or cycle to cross the road (e.g. development is only on one side) [2].
- cycle provision along the route is ‘suitable for most people’, based on Table 11.1 of the ATAG. This will usually require physical protection from motor traffic [3]

** ATAG = Active Travel Act Guidance, which Mr Clogg should know well

[1] clear unobstructed width of 2.0m (desirable minimum), which allows two wheelchair users to pass one other. Where physical constraints make this impossible a clear width of 1.5m (absolute minimum)

[2] mainly takes place at defined locations, which are provided with facilities in accordance with Section 12.3 of the ATAG

[3] Protected space for cycling (including light segregation, stepped cycle track, or kerbed cycle track)

The exceptions proposed in the East Vale - through much of Dinas Powys,

down Cogan Hill through Cogan, and along Lavernock Rd to Cosmeston - breach the WGovt *Exceptions Criteria* in two clear ways:

- **designated cycling routes**; all are on-road with no segregation. Most lack even lines on the roadway, except approaching traffic lights. Where cyclists have to move out for turning right, there's no marking or segregation.
- **substandard footways**. The standard width is 2 metres. In an extreme, 1.5 metres for short stretches if unobstructed. Cogan Hill fails, being over narrow with a railing; there's no crossing from Penarth Haven to Cogan Station, the pavement to the Cogan bus-stop has a 1 metre pinch point. Lavernock Rd likewise has a stretch of over-narrow pavement just before the Schooner inn, on route to Cosmeston park and the housing estate.

2.325 Windsor Road has a "future" cycling route and an "existing" pedestrian route showed on-road as far as Cogan Station access above the bottom of Cogan Hill, then a "future" walk/cycle route through Cogan roundabout and up to Barons Court junction. Clearly the existing walking route uses the pavement through Cogan. The "future" seems to use the pavement on the west side of Cogan Hill, but could use that on the east side, as pedestrians do to the few homes and businesses and for turning into Marconi Ave.

2.326 The Redlands Rd 'future' route through to Llandough is also incompletely defined, starting on the west pavement up Penlan Rd but drifting into the roadway, while on Redlands Rd starting on the east pavement then drifting into the road. Cyclists currently (have to) go through the traffic lights where there are advanced stop-lines for them. The cycle-route clearly mixes with traffic. The 2-metre pavements (narrows to half that at the house 138 Andrew Rd) do not accommodate sharing the footway. The ASLs show the current cycle-route is on-road (as also on Cogan Hill).

2.327 The **Highways Dept. surely did not survey** the pavements or look at the Council's "**Active Travel**" network, or they could not in honesty have claimed **in line with the Welsh Government exceptions criteria**

2.328 **Officer response 21.**

2.329 The Minutes of the Environment and Regeneration Scrutiny Committee on 18th July, 2023 meeting (Minute No. 230) can be viewed in the following link below. The references made to discussions in the Scrutiny Committee meeting by the objector are considered misleading and generally out of context. The Minutes clearly clarify the officers' position that the Council followed the Guidance provided by Welsh Government "Setting exceptions to the 20mph default speed limit for restricted roads" in a reasoned and proportionate manner which was considered to be appropriate and consistent. Refer also to detailed comments in previous responses regarding the following of Welsh Government exceptions

Guidance. The Scrutiny minutes also record that a concise response was provided to the collisions at Station Road junction in Dinas Powys.

<https://www.valeofglamorgan.gov.uk/Documents/Committee%20Reports/Scrutiny-ER/2023/23-07-18/Minutes.pdf>

- 2.330** Paragraph 2.1.3 outlines the two principal questions, A and B, that should be considered by highway authorities when deciding whether a 30mph exception should be made.
- 2.331** Whilst it is not a mandatory requirement to apply these questions to exceptions, they were used and considered with all of the proposed exceptions. Unfortunately, the guidance is vague in the use of some its statements, including the use of the word “significant” or “potential”:
- 2.332 Question A: are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?**
- 2.333** There is no definition, or statistical value of what the Welsh Government deem as “significant”. Furthermore, there was no forecasting model, or increase factors in the guidance, to quantify what “potential” numbers of pedestrians and cyclists would use the road if the speeds were lower.
- 2.334** It is also noteworthy that paragraph 2.2.10 within the Place Criteria states: *“however, highway authorities continue to have the flexibility to set local speed limits that are right for individual roads, reflecting local needs and considerations”*.
- 2.335** Based on officer experience of the uptake in numbers using the many shared-use active travel routes provided, officer assessments were empirical.
- 2.336** It is also the case that Welsh Government guidance does not refer to ATNM anywhere within the document and it was considered that both traffic speed and volume) would deter potential pedestrian and cyclist use and as most A & B Class roads carry significant volumes of traffic it was therefore deemed improbable that reducing speed alone will increase usage on this class of road.
- 2.337 Question B: if the answer to A is ‘yes’, are the pedestrians and cyclists mixing with motor traffic?**
- 2.338** Where it was felt that the mixing of pedestrians and cyclists with motor traffic justifies the route becoming 20mph, that approval was subsequently made.
- 2.339** Protected facilities for pedestrians and cyclists are covered in paragraphs 2.2.18 and 2.2.19 of the Welsh Government document – “Setting exceptions to the 20mph default speed limits for restricted roads”, which states:
- 2.340** Paragraphs 2.2.18 – exceptions may be appropriate where there is significant demand (or potential demand) for walking and cycling so long as the highway

authority is satisfied that the answer to Principal Question B is 'no' (see 2.1.3), that people on foot and cycle are not required to mix with motor traffic.

2.341 Paragraph 2.2.19 – this would require protected facilities to be provided for pedestrians and cyclists which meet the ATAG, in particular:

- there are footways in accordance with Section 9.6 of the ATAG on the side(s) of the road fronted by development or to provide necessary connectivity.
- any demand for pedestrian and cycle crossing movements mainly takes place at defined locations, which are provided with facilities in accordance with Section 12.3 of the ATAG; or alternatively there is no requirement for people on foot or cycle to cross the road (e.g. development is only on one side).
- cycle provision along the route is 'suitable for most people', based on Table 11.1 of the ATAG. This will usually require physical protection from motor traffic.

2.342 The establishments mentioned on Lavernock Road, Ffordd-y-Mileniwm, Gladstone Road and Cardiff Road were considered in the context of the Principal Questions and Place Criteria. However, due to several factors e.g., the establishments may not have been listed on the Place Criteria, there are protected facilities for pedestrians and cyclists to cross the road at defined locations, the mixing of pedestrians and cyclists is not deemed to be significant, or there may be no requirement to cross the road, as is the case for Brockhill Community Centre. Consideration was also given to any recorded or identified highway safety issues involving vulnerable road users on all routes. A summary of the decision making relating to the various issues raised over specific locations are clarified below:-

- > Jenner Road is not identified as an exception and will default to 20mph.
- > Brockhill Community Centre does meet the Place criteria (Criterion 2) for Lavernock Road, however, local factors have been applied and Criterion 2 is not considered to be met as residential development in this area is all on the east side of the road and therefore access to the community centre does not require significant mixing with traffic.
- > Cosmeston Country parks located off Lavernock Road is not identified within the Place criteria and is served by good, protected facilities in the form of footway and cycleway provision meeting ATAG to access the park, including a Toucan controlled crossing.
- > There is no reference to a nursery in the Place criteria in relation to Gladstone Road and is also considered to be served by good, protected facilities for pedestrians meeting ATAG.
- > The YMCA is generally considered to be served by good, protected facilities meeting ATAG.
- > The Palmerston Centre for Lifelong Learning on Cadoc Crescent meets the Place criteria (Criterion 2), however, there is limited requirement to cross the

Cardiff Road to access the facility given the residential development in the area is on the same side of the road and local factors have been applied as there is no significant mixing with traffic.

- > It is accepted that Penarth Leisure Centre is located on Andrew Road within 100m of Windsor Road and is an attractor for pedestrians and cyclists which is considered when reviewing the exception proposed along Windsor Road within this report.
- > Pontypridd Road although meeting place criteria is not considered to have significant pedestrian and cycle movements and generally good, protected facilities meeting ATAG.
- > Gladstone Bridge has a Toucan crossing facility which meets with protected facilities in the ATAG.
- > There are no residential properties directly fronting and accessing Ffordd Y Mileniwm between Gladstone Bridge and the Dock office. All the residential properties are accessed via sideroads.
- > The Waterfront Medical Centre is some 150m away from Ffordd Y Mileniwm and therefore does not meet the Place criteria (Criterion 3). It is also generally served by good, protected facilities meeting ATAG.
- > The proposed exception to Ffordd Y Mileniwm ends east of Hood Road and the gateway is some 150m from the new Ysgol Gymraeg Sant Baruc.

2.343 It is also noteworthy that paragraph 2.2.10 within the Place Criteria states: “however, highway authorities continue to have the flexibility to set local speed limits that are right for individual roads, reflecting local needs and considerations”.

2.344 Following representations from objectors, and subsequent review of the exceptions criteria, it has been agreed that St Nicholas’ Road and Park Avenue, Barry meeting the Place criteria should default to 20mph due to the probability of significant pedestrian and cycle mixing and the proposed 30mph exception is not progressed. However, the 30mph exception will be retained on Broad Street (part) and Harbour Road (part) as these areas do not meet the criteria in the Guidance. The schedule within the proposed Order will be amended as outlined at Appendix ‘D’.

2.345 Where it was felt that there was “significant” or “potential demand” for walking and cycling then those roads were retained at the 20mph default. Conversely, 30mph exceptions were proposed where walking and cycling was deemed to be below the guidance set by Welsh Government. If the strategic ‘A’ and ‘B’ routes were reduced to 20mph, the composition and volumes of motor traffic would potentially deter inexperienced or leisure cyclists from using those routes. However, it is acknowledged that more seasoned and experienced cyclists would use those routes, irrespective of the types and/or volume of traffic. However, it was considered that both traffic speed and volume would deter potential pedestrian and cyclist use and as most A&B Class roads carry significant volumes of traffic it was therefore deemed unlikely and improbable that reducing speed alone will increase usage on this class of road.

- 2.346** The aforementioned Welsh Government guidance was not published and provided to Councils until November 2022. This delay gave officers very little opportunity to undertake any quantitative assessments of cyclists and pedestrians using restricted roads that are currently 30mph. Furthermore, the Welsh Government gave no additional funding for any preparatory work, including surveys.
- 2.347** Due to the delay in publishing the Guidance, officers had no option but to primarily base their exception proposals on empirical information which comprised a mixture of local knowledge, collision investigations and using existing traffic surveys already held.
- 2.348** It is proposed that further assessments will be required for various exception roads in accordance with proposed updated guidance for “Circular No: 24/2009 - Setting Local Speed Limits in Wales”, to review and gather robust evidence to determine the mixing of pedestrians and cyclists with motor traffic and ensure that as far as reasonably practicable the speed limits on this section of the A48 are suitable for the conditions including usage.
- 2.349** Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate amendments or finessing of speed limits where required. It will therefore be the Councils intention to monitor the new speed limits on all exception roads, to take onboard any future comments or concerns and determine whether changes should be made based on a revision of the existing Welsh Government Circular No: 24/2009 – “Setting Local Speed Limits in Wales.”
- 2.350 Concern 22 – Conclusion**
- 2.351** FoE already asked the Council’s Monitoring officer to withdraw the proposed ‘Exceptions’ for Penarth, Llandough, Dinas Powys and Sully because the website statement is wrong and misleads the public. We’ve given evidence above that those Exceptions and numerous others do not comply with the WGovt criteria. Their purpose is not stated and the required evidence for robust decision-making does not exist. Some are claimed as 30mph ‘buffers’ between 40 and 20mph. but mostly do not comply with the minimum length (listed in the ANNEX), so have to be dropped. The proposals have wrongly ignored the designated Active Travel cycle-routes.
- 2.352** The proposals are costly to implement, they add to street clutter and confusion for drivers. Though Mr Clogg’s team has been driving ahead to erect the signs prior to consultation and approval, the Council should limit its losses and drop the proposed exceptions (as long as dropping any does not adversely affect safety). In accordance with Welsh Govt reasons, we believe the 20mph change indeed will have a positive effect on safety.
- 2.353** ANNEX Proposed Buffer/transition Exceptions below the 300m limit.

- 2.354** Merrie Harrier junction
- 2.355** *Llandough (near Penarth) Area* Refer to drawings: T/23/108/ and T/23/111/WS
- 2.356** Leckwith Road (B4267) (part), Llandough From the boundary line of the properties Tree Tops and Innisfree in a north-westerly direction for a distance of approximately **254 metres**
- 2.357** Penlan Road (B4267) (part), Llandough From the centre point of its junction with Barry Road, north-eastwards for a distance of approximately **110 metres**.
- 2.358** Redlands Road (B4267) (part), Penarth From the centre point of its junction with Eastbrook Road, south-eastwards for a distance of approximately **127 metres**
- 2.359** Sully Area Refer to drawing: T/23/103/WS
- 2.360** Hayes Road Roundabout, Sully Will be subject to a 30mph speed limit for its entire length, a distance of approximately **85 metres**.
- 2.361** Sully Moors Road (part), Sully From the centre point of its junction with Hayes Road Roundabout, north-westwards for a distance of approximately **95 metres** and contiguous with existing 40mph speed limit.
- 2.362** Hayes Road (part), Sully From the centre point of its junction with Hayes Road Roundabout, south-westwards for a distance of approximately **44 metres** and contiguous with existing 40mph speed limit.
- 2.363** South Road (part), Sully From the centre point of its junction with Hayes Road Roundabout, eastwards for a distance of approximately **88 metres**. From the centre point of its junction with Beach Road, westwards for a distance of approximately **285 metres**.
- 2.364** Swanbridge/Beach Rd junction
- 2.365** Lavernock Road (part), Sully From the centre point of its junction with Beach Road, eastwards for a distance of approximately **138 metres** and contiguous with existing 40mph speed limit.
- 2.366** Sully Road (part), Sully From a point approximately 10 metres northeast of the centre point of its junction with Cog Road, north-eastwards for a distance of approximately **150 metres** and contiguous with existing National speed limit
- 2.367** Ewenny: T/23/86/MS and T/23/126/MS B4524
- 2.368** Ogmore Rd from St Brides Road, westwards for 254 metres; St Brides Rd north for 45 metres; Corntown Rd from the B4224 junction, south easterly for 73 metres.

2.369 Fonmon: T/23/98/MS Fonmon Rd / Port Rd junction, southwards 280m; Port Rd (from junction westwards 50metres and eastwards 20 metres.

2.370 Officer response 22.

2.371 The proposals are acceptable and proportionate when taking into account the criteria, local factors and officer knowledge and experience.

2.372 Whilst consideration was given to ensuring the minimum length of 30mph exceptions met the Setting Local Speed Limits guidance, unfortunately, there were instances where this could not be achieved, e.g., site conditions, forward visibility, or looking to utilise existing 30mph sign locations. A brief response to individual roads highlighted as below the 300m limit is provided below.

2.373 Merrie Harrier junction:

- > Leckwith Road (B4267) - future extension planned to the 30mph speed limit associated with ongoing residential development accommodate on Land North of Leckwith Road, Llandough, Planning Ref. 2018/01023/FUL.
- > Penlan Road (B4267) ties-in and is contiguous with Redlands Road (B4267) exception 30mph speed limit with combined length exceeding 300m.
- > Redlands Road (B4267) ties-in and is contiguous with Penlan Road (B4267) exception 30mph speed limit with combined length exceeding 300m.
- > Eastbrook Road ties-in and is contiguous with Cardiff Road (A4055) exception 30mph speed limit with combined length exceeding 300m.

2.374 Sully Area:

- > Hayes Road roundabout comprising Sully Moors Road (part), Hayes Road (part) and South Road (part) – considered acceptable to have exception 30mph speed limit due to mitigation of speed reduction through roundabout.
- > South Road (part) from centre of Beach Road ties-in and is contiguous with Lavernock Road (B4267) 30mph speed limit with combined length exceeding 300m.

2.375 Swanbridge / Beach Road junction:

- > Lavernock Road (part) ties-in and is contiguous with South Road (part) exception 30mph speed limit with combined length exceeding 300m.
- > Sully Road (part) – not associated with any exception but a consequence of the default of Swanbridge Road to 20mph under Welsh Government legislation.

2.376 Ewenny:

- > Ogmores Road (B4524), St Brides Road (B4265) and Wick Road (B4524) all tie-in and are contiguous providing a combined length of exception 30mph speed limit exceeding 300m.

- 2.377** Fonmon:
- > Fonmon Road – not identified as exception 30mph speed limit but the remaining length of a 30mph by Order limit after implementing 20mph default and 20mph speed limit by Order.
- 2.378** Should the proposed 30mph exceptions be implemented then they will of course be subject to monitoring and review. The Welsh Government acknowledge that there will be many locations with short-term issues with new speed limits during the early stages of the project. A budget will become available during the 2024/25 financial year to assist Councils with surveys and any subsequent amendments that might be required to 30mph exceptions or within 20mph default areas.
- 2.379** **Objector 8 – Plaid Werdd Green Party: petition.**
- 2.380** **Concern 23 – Say No to 30mph of St Nicholas Road and Park Avenue.**
- 2.381** We call on the Vale of Glamorgan Council to apply 20mph default speed limit to St Nicholas Road and the adjoining Park Avenue, Harbour Road and Broad Street....for the sake of our children and the environment.
- 2.382** **Officer response 23.**
- 2.383** Following representations from objectors, and subsequent detailed review of the exceptions criteria, it has been agreed that St Nicholas' Road and Park Avenue, Barry meeting the Place criteria should default to 20mph due to the probability of significant pedestrian and cycle mixing and the proposed 30mph exception not be progressed. However, the 30mph exception will be retained on Broad Street (part) and Harbour Road (part) as these areas do not meet the criteria in the Guidance. The schedule within the proposed Order will be amended as outlined at Appendix 'D'.
- 2.384** **Objector 9 – Online Comments from Questionnaire.**
- 2.385** **Concern 24 – Llangan Village (T/23/65/WS)**
- 2.386** Our understanding is that the current 30 mph roads through the villages will change to 20 mph limit. The proposed 20 mph limit order will replace the current 30 mph limit not currently mandated by street lighting. Llangan Area, T/23/65/WS We welcome these changes. Additionally, we would propose extending the 20 mph Traffic Order along the un-named road through the centre of the village of Llangan, from the junction with Twchwch Garth eastwards to the junction with Cwrt Canna. The reason for this is to provide safety for pedestrians, runners, dog-walkers and cyclists and horse-riders who regularly use these lanes. We note that these users who wish to walk, cycle or ride, including pupils of Llangan school who wish to use active travel to get to school, are currently denied this opportunity because the road is narrow and unsafe.

We believe this is an excellent opportunity to extend the speed limit now to create opportunities for people who wish to use active travel to safely commute to the school and further to Llangan and St. Mary Hill Village Hall. They are currently unable to do so. This proposal extends to drawing T/23/65/WS. We also propose a second extension of the speed limit from Llangan and St Mary Hill Village Hall to the national speed limit at the end of Heol Lidiard. This would encourage safe driving past the entrance to the village hall and near Heol Lidiard. Impact of Proposed Changes on other Rural Roads. Lastly, we would like to understand the impact that these proposals will have on the volume of traffic travelling through the villages of Llangan, Treoes and St Mary Hill. Currently, the villages are used as “short-cuts” by commuters who are guided by their sat-navs. These devices do not take into consideration the actual conditions of the environment and the state of these roads, only the routes and speed limits. We are concerned that dropping the speed limit in some areas will result in drivers being routed along other, country lanes, thereby creating undesirable consequences of increased traffic on narrow and unsuitable roads. We would like to see the modelling that has been done around this and understand the impact.

2.387 Officer response 24.

2.388 The un-named road between Twchwyn Garth and Cwrt Canna is out of scope as it is derestricted i.e., it is not subject to 30mph by virtue of street lighting and will not form part of the Welsh Government default of 20mph.

2.389 The section of road fronting Heol Lliardiard is subject to a speed limit of 40mph by traffic regulation order, as a consequence this road is also out of scope and will not default to 20mph and would need to be amended by Order in the future subject to review in accordance with relevant Guidance as well as budget and resource availability.

2.390 Any future amendments to speed limits will be subject to the requirements of an amendment of the current Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.

2.391 The comments regarding volume of traffic along the route between Pentre Meyrick and Ruthin is noted. It needs to be borne in mind that the route is a classified and unnumbered road, formerly a ‘C’ class route. As such, its use by HGVs is to be expected. Any engineering measures will be subject to a collision analysis and if found to be of concern, will compete with other similar schemes for funding.

2.392 The camera partnership currently enforce the area and residents have been advised to contact GoSafe for increased enforcement and/or setting up a community speed watch group.

- 2.393** The 20mph default on restricted roads is a Welsh Government project, where legislation for their changes came into force on 12th July, 2022. Any concerns, or queries, relating to the consequential effects of imposing 20mph limits in rural villages and any modelling work to ascertain, or mitigate its impacts on adjacent country roads is a matter for the Welsh Government to address.
- 2.394** The remit of Councils is to facilitate the necessary changes to signs, lines, as well as creating 30mph exceptions that would not be appropriate for the default 20mph.
- 2.395** Welsh Government is in the process of updating its guidance for “Circular No: 24/2009 - Setting Local Speed Limits in Wales”. The Council will monitor and undertake reviews of roads within its local highway network where concerns are identified or as considered appropriate in the future based on the updated guidance when published by the Welsh Government and take appropriate measures to ensure that as far as reasonably practicable that the speed limits are suitable for the conditions, the needs of the local community and consistent with its published policy objectives. Any request for future changes to speed limit will be subject to budget and resource availability at that time.
- 2.396 Concern 25 – Llangan (T/23/66/WS)**
- 2.397** Our understanding is that the current 30 mph roads through the villages will change to 20 mph limit. The proposed 20 mph limit order will replace the current 30 mph limit not currently mandated by street lighting. Llangan Area, T/23/65/WS We welcome these changes. Additionally, we would propose extending the 20 mph Traffic Order along the un-named road through the centre of the village of Llangan, from the junction with Twchwch Garth eastwards to the junction with Cwrt Cana. The reason for this is to provide safety for pedestrians, runners, dog-walkers and cyclists and horse-riders who regularly use these lanes. We note that these users who wish to walk, cycle or ride, including pupils of Llangan school who wish to use active travel to get to school, are currently denied this opportunity because the road is narrow and unsafe. We believe this is an excellent opportunity to extend the speed limit now to create opportunities for people who wish to use active travel to safely commute to the school and further to Llangan and St. Mary Hill Village Hall. They are currently unable to do so. This proposal extends to drawing T/23/65/WS. We also propose a second extension of the speed limit from Llangan and St Mary Hill Village Hall to the national speed limit at the end of Heol Lidiard. This would encourage safe driving past the entrance to the village hall and near Heol Lidiard. Impact of Proposed Changes on other Rural Roads. Lastly, we would like to understand the impact that these proposals will have on the volume of traffic travelling through the villages of Llangan, Treoes and St Mary Hill. Currently, the villages are used as “short-cuts” by commuters who are guided by their sat-navs. These devices do not take into consideration the actual conditions of the environment and the state of these roads, only the routes and speed limits. We are concerned that dropping the speed limit in some areas will result in drivers

being routed along other, country lanes, thereby creating undesirable consequences of increased traffic on narrow and unsuitable roads. We would like to see the modelling that has been done around this and understand the impact.

2.398 Officer response 25

2.399 The un-named road between Twchwyn Garth and Cwrt Canna is out of scope as it is derestricted i.e., it is not subject to 30mph by virtue of street lighting and will not form part of the Welsh Government default of 20mph.

2.400 The section of road fronting Heol Lliardiard is subject to a speed limit of 40mph by traffic regulation order, as a consequence this road is also out of scope and will not naturally default to 20mph and would need to be amended by Order in the future subject to review in accordance with relevant Guidance as well as budget and resource availability.

2.401 Any future amendments to speed limits will be subject to the requirements of an amendment of the current Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.

2.402 The comments regarding volume of traffic along the route between Pentre Meyrick and Ruthin is noted. It needs to be borne in mind that the route is a classified and unnumbered road, formerly a 'C' class route. As such, its use by HGVs is to be expected. Any engineering measures will be subject to a collision analysis and if found to be of concern, will compete with other similar schemes for funding.

2.403 The camera partnership currently enforce the area and residents have been advised to contact GoSafe for increased enforcement and/or setting up a community speed watch group.

2.404 As mentioned previously, the 20mph default on restricted roads is a Welsh Government project, where legislation for their changes came into force on 12th July, 2022. Any concerns, or queries, relating to the consequential effects of imposing 20mph limits in rural villages and any modelling work to ascertain, or mitigate its impacts on adjacent country roads is a matter for Welsh Government to address.

2.405 The remit of Councils is to facilitate the necessary changes to signs, lines, as well as creating 30mph exceptions that would not be appropriate for the default 20mph.

2.406 Welsh Government is in the process of updating its guidance for "Circular No: 24/2009 - Setting Local Speed Limits in Wales". The council will monitor and undertake reviews of roads within its local highway network where concerns are identified or as considered appropriate in the future based on the updated

guidance when published by the Welsh Government and take appropriate measures to ensure that as far as reasonably practicable that the speed limits are suitable for the conditions, the needs of the local community and consistent with its published policy objectives. Any request for future changes to speed limit will be subject to budget and resource availability at that time.

2.407 Concern 26 – Colwinston (T/23/67/WS)

2.408 The Colwinston Community Council have reviewed the areas as marked on the maps and would like to comment on the siting of the change of the change of speed from the national speed limit. At present the 30mph limit stops just after an area locally known as the Old Ford Area. This is an area that the Community Council is currently transforming with the local residents into a community space involving a medieval well, an ancient clapper bridge and woodland. As a result the volume of pedestrian traffic around this area is dramatically increasing and the safety of visitors would greatly increase from the limit being brought in before the area rather than after it. The boundary of the current limit is after the brook crosses the road. Where the brook crosses the road is where the majority of the pedestrians will be crossing the road to bridge, woodland and well. If you look at the area you will see that the road cuts through the area and has historic sites, benches and woodland on both sides of the road, thereby encouraging people to cross the road. On travelling towards the village vehicles will currently approach the area at the national speed limit through a corner that blocks their view of the road in the distance until they are round it and then are on top of the old ford area. This corner adds to the danger particularly at the higher speed.

2.409 Officer response 26.

2.410 Restricted roads are defined by section 82 (1) (a) of the Road Traffic Regulation Act 1984, as roads with a system of street lighting furnished with lamps not more than 200 yards apart. Most restricted roads are in built-up areas. Therefore, those areas that are not covered by a system of street lighting will not default 20mph and the existing speed limit will remain.

2.411 Welsh Government is in the process of updating its guidance for “Circular No: 24/2009 - Setting Local Speed Limits in Wales”. The council will monitor and undertake reviews of roads within its local highway network where concerns are identified or as considered appropriate in the future based on the updated guidance when published by the Welsh Government and take appropriate measures to ensure that as far as reasonably practicable that the speed limits are suitable for the conditions, the needs of the local community and consistent with its published policy objectives. Any request for future changes to speed limit will be subject to budget and resource availability at that time.

2.412 Concern 27 – Fonmon (T/23/72/WS)

- 2.413** Would it be possible to extend the 20mph limit along Castle Road to begin before Fonmon Castle gates so that villagers can walk safely along roads to footpaths and woods. Port Road to the highwayman should also be 20mph for Nurston residents. Can the 20mph also begin at the B4265?
- 2.414 Officer response 27.**
- 2.415** Restricted roads are defined by section 82 (1) (a) of the Road Traffic Regulation Act 1984, as roads with a system of street lighting furnished with lamps not more than 200 yards apart. Most restricted roads are in built-up areas. Therefore, those areas that are not covered by a system of street lighting will not default 20mph and the existing speed limit will remain.
- 2.416** Welsh Government is in the process of updating its guidance for “Circular No: 24/2009 - Setting Local Speed Limits in Wales”. The council will monitor and undertake reviews of roads within its local highway network where concerns are identified or as considered appropriate in the future based on the updated guidance when published by the Welsh Government and take appropriate measures to ensure that as far as reasonably practicable that the speed limits are suitable for the conditions, the needs of the local community and consistent with its published policy objectives. Any request for future changes to speed limit will be subject to budget and resource availability at that time.
- 2.417 Concern 28 – Ogmores-by-Sea (T/23/95/MS)**
- 2.418** Introduction of 20mph limit is a farce. To start the limit at the point indicated (near Crompton Way) means signs which are intrusive and detrimental to the value of the surrounding properties. I strongly object. Solutions would be Keep Main rd as 30mph throughout Start the 20mph limit before Craig yr Eos Road junction I have no faith in your ability or your so called consultation. Absolutely disgusted, you’ve undoubtedly lost my vote and support!
- 2.419 Officer response 28.**
- 2.420** There is no evidence to suggest that the installation of traffic signs near to residential properties has a detrimental impact on property values.
- 2.421** The exceptions guidance provided by the Welsh Government has been interpreted in a consistent, reasoned, and proportionate manner to determine which sections of road on the ‘A’ and ‘B’ route network should become “exceptions” and remain 30mph.
- 2.422** Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate amendments or finessing of speed limits where required. It will be the Councils intention to monitor the new speed limits, to take onboard any comments or concerns and determine whether changes should be made

based on a revision of the existing Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.”

2.423 Concern 29 – Ogmore-by-Sea and Southerndown (T/23/96/MS)

2.424 I have noted of late the placement of new road signage (assuming that these are related to the implementation of the new 20mph speed limit safety scheme to come into force in September 2023?) Firstly, the placement of the signs situated as a pair and fronting access to the eastern access to West Farm Rd and the B4524. These signs front access to an un-adopted highway and is in the ownership (as I understand it) of The Dutchy of Lancaster the section running the majority of the un-adopted gravel track road (from the adopted highway of West Farm Rd to the cattle grid, and from that point to the B4524, in the ownership of Dunraven Estates. We as residents have easement in place to access our respective properties along this track. If the signs put in place suggest a speed limit of up to 20mph, the gravel track is, in my opinion, not suitable for this. Furthermore, does this present an element of litigation from a road user perspective on the Local Authority (LA) to endorse the use of this arguably poorly maintained and un-adopted roadway?....or is the risk of litigation passed to residents (we have a loose agreement to repair and maintain to a limited level) or landlords of these respective sections? In addition to this, it may put more pressure on safety to residents and the general public using this as a PROW (assuming it is) for walkers and cyclists (no pavements or drainage) and increase the degradation of the gravel highway. I'd be grateful to get your thoughts on this and convey this by way of consultation to the residents in the immediate area.

2.425 Officer response 29.

2.426 Having revisited the site following representation from the objector, it was noted that the point of access off the B4524 is posted as “private road”.

2.427 It has been agreed to not progress with the installation of the short section of 20mph by Order, based on the representations received from the objector and our findings.

2.428 The schedule within the proposed Order will be amended as outlined at Appendix ‘C’.

2.429 Concern 30 – St Athan (T/23/100/MS)

2.430 Whilst most would support 20mph outside hospitals, schools and other public buildings, everywhere else just seems to form part of a national anti-private car policy by the Welsh Assembly

2.431 Officer response 30.

- 2.432** The 20mph default on restricted roads is a Welsh Government initiative. The Senedd approved with legislation to lower the default national speed limit on restricted roads from 30mph to 20mph and legislation was subsequently passed by Welsh Government on 12th July, 2022. Any concerns, or queries, relating to the consequential effects of imposing 20mph limits in rural villages and any modelling work to ascertain, or mitigate, its impacts on adjacent country roads is a matter for the Welsh Government.
- 2.433** The remit of Welsh Councils is to facilitate the necessary changes to signs and, lines associated with the change to the new default 20mph speed limit, as well as creating 30mph exceptions that would not be appropriate for 20mph in accordance with Guidance provided and published by the Welsh Government.
- 2.434 Concern 31 – Sully (T/23/103/WS)**
- 2.435** The drawing is far from clear what the situation will be as regards 20mph for the majority of Sully as apart from the green & red coloured roads the rest are blank! and do not contain any key at all !!! Are you proposing that all of the road between Sully & Cosmeston will be 20mph, which would be ludicrous. I suggest you reissue the information so that it is able to be easily understood, otherwise this "consultation" is yet another tick box rather than a meaningful exercise. I do not consider any of the proposal to be workable or enforceable in practical terms and will not bring any change in motorists behaviour is yet another degradation of ability to travel. It is a policy that has little support with Wales and once again we are being dictated to by a Government that has no mandate from the electorate to carry out this policy.
- 2.436** I object to the proposed 30mph Speed Limit Order at the roundabout between Sully Moor Rd, Sully Road and Hayes Road. I strongly believe beneficial to have a 20mph limit there, and rather move the 30mph buffer zone further before the roundabout in Sully Moor Rd and Hayes Road. This would be more effective in reducing the speed of cars entering the village and make the red-marked pedestrian crossing at that western end of South Road more safe (I, my family and many other local people use to reach the bus stop and the fields/footpath to the beach).
- 2.437** I am very surprised that there are exceptions to 20mph that have been proposed by Vale of Glamorgan Council on two sections of South Road in Sully, at each end of the village. One of these is a long section of South Road as it enters the village from Penarth and as far as the road entrance to Sully Sports & Social Club. There are multiple features that make this section entirely unsuitable for an exception. Indeed, there is a strong argument for reducing the speed limit to 30 mph some way further in advance (than currently the case) of entry to the village where the speed should then drop to 20mph. This reduction from 40mph to 30mph would be further eastwards on the B4267 Lavernock Road, allowing the speed to drop from 30mph to 20mph prior on Lavernock Road and prior to entry to the village and the road's continuation as South Road

and its crossing of road. Indeed, this exception at the eastern entry to Sully has been placed in a particularly intimidating section of Laverock Road and South Road for pedestrians, cyclists and other vulnerable road users. It is a known trouble spot for speeding which requires specific attention although GoSafe refuse to enforce in this section for some for some technical reason. By contrast, South Wales Police conducted a very busy (and productive) enforcement effort in this section some months ago. Indeed, I witnessed a large proportion of vehicles being stopped for speeding as they passed the zebra crossing adjacent to the Library and the entrance to Sully Sports & Social Club. Amongst other things, this eastern section of South Road includes two bus stops (with no allied pedestrian crossing facility), a nextbike docking station, a dedicated pedestrian entrance to Sully Sports & Social Club (also with no allied pedestrian crossing facility) and other relevant features and use. I understand that as part of the Cog Housing Scheme there are also plans for an active travel route along Swanbridge Road from the development to its junction with South Road and Beach Road. You may also know that Beach Road is also a popular walking and cycling route to Swanbridge, with its various attractions and facilities. There is no protected walking area or pavement for walkers navigating Beach Road. Of course, you attractions and facilities. There is no protected walking area or pavement for walkers navigating Beach Road. Of course, you will also know that this is the section of South Road where you are planning the beginning of a new a active travel route (Sully to Cosmeston Active Travel Route). At the western end of South Road, there is an exception from before the roundabout on both Sully Moors Road and Hayes Road. This is somewhat illogical as there is a steep and curved climb into the village after the roundabout as vehicles exit the roundabout towards South Road. As it is, the vast majority of motor vehicles drive at around or below 20mph as they exit this roundabout towards South Road. Under the exception, motor vehicles will be encouraged to accelerate immediately prior to entering the village and then very shortly afterwards signed to slow to 20mph before South Road's junction with Cog Road, already an extremely intimidating junction for pedestrians, cyclists and other vulnerable road users. This is illogical, confusing and dangerous for pedestrians, cyclists and other vulnerable road users. It should also be noted that this is close to Beechwood College where there are many vulnerable students and staff who regularly walk along and cross this section of South Road. I should add that in its statement of reasons covering the VoG TRO covering exceptions to the national 20mph limit, it states: Statement of Reasons The Order is necessary to maintain the existing speed limits of 30 mph on selected strategic roads within the County after the Welsh Government has passed legislation to implement a 20mph default speed limit in urban areas nationally throughout Wales in the interest of road safety (The Restricted Roads (20 mph Speed Limit) (Wales) Order 2022). The Council as Local Highway Authority considers that these roads are strategic routes with higher volumes of daily traffic compared to urban residential streets and as such do not meet the criteria or the nature of a road with a speed limit of 20 mph. The Council considers that the existing 30 mph speed limit is an appropriate speed limit in order to maintain a reasonable traffic flow on higher traffic volume strategic routes. This takes no account of the Government

Guidelines which clearly require a reasoned case for setting a limit 50% higher than the national norm. The fact that the Council “considers a 30mph limit is appropriate” is neither “a robust and evidenced application of local factors” as required in the guidance or indeed a “clear and reasoned case” for deviating from the guidance. Regardless of any individual case, the Statement of Reasons for the TRO is insufficient. Hence I am concerned that the TRO is flawed to the extent that it would be irresponsible for members to make such a TRO on such flimsy grounds.

- 2.438** Cyclists sharing road with motorised vehicles going too fast. When I commute this way I am consistently subject to close passes coming off the roundabout from Hayes Rd onto South Rd, the road has a slight kink, cars don't allow for this and cut in (towards a cyclist) too soon. It is a high risk area for active travel users. The answer to the principal questions in the WG guidance documents is yes for both A and B for this section of road. Each section of road in the traffic orders document is also shorter than the 300 metres WG minimum guidance.
- 2.439** South Road (part), Sully From junction with Beach Road, westwards for approximately 285 metres. The answer to the principal questions in the WG guidance documents is yes for both A and B for this section road, on road cycle route without dedicated provision and the potential for a lot more cyclists if the speeds were lower. The distance of approximately 205 metres is also shorter than the 300 metres WG minimum guidance. The route does not fit for purpose share cycle route starts after the junction with Swanbridge Rd and there is no priority for cyclists or pedestrians at that junction. Therefore any exception should not start prior to that junction.
- 2.440 Officer response 31.**
- 2.441** All information was provided on the Council’s consultation webpage, as well as a link to the Welsh Government’s interactive mapping system, Data Map Wales, which shows what areas are going to default to 20mph, as well as the 30mph exception sites and 20mph buffer limits.
- 2.442** The 20mph default on restricted roads is purely a Welsh Government initiative. The Senedd approved with legislation to lower the default national speed limit on restricted roads from 30mph to 20mph and legislation was subsequently passed by Welsh Government on 12th July, 2022. Any concerns, or queries, relating to the consequential effects of imposing 20mph limits in rural villages and any modelling work to ascertain, or mitigate, its impacts on adjacent country roads is a matter for Welsh Government.
- 2.443** The remit of Welsh Councils is to facilitate the necessary changes to signs and lines associated with the change to the new default 20mph speed limit, as well as creating 30mph exceptions that would not be appropriate for 20mph in accordance with Guidance provided and published by the Welsh Government. Paragraph 1.1.2 of the Welsh Government document – Setting exceptions to the

20mph default speed limit for restricted roads states: *“this guidance is intended for local interpretation by highway authorities to make evidence-based decisions on setting exceptions to the default speed limit of 20mph on restricted roads in Wales, which will come into force on 17 September 2023.”*

- 2.444** The document is not mandatory and is guidance only. Whilst it was used to consider all proposed exceptions, local knowledge and interpretation was used in the decision making process.
- 2.445** Paragraph 2.1.1 states: *“a 20mph speed limit should be set where pedestrians and/or cyclists and motor vehicles mix in a frequent manner, except where strong evidence exists that higher speeds are safe”.*
- 2.446** Welsh Government has not provided a definition, or statistical interpretation of what is “frequent”. As an adjective, the word frequent can be described as “occurring or done many times at short intervals” When applying the guidance, it was not deemed reasonable that frequent mixing was occurring in the locations identified, nor was there strong evidence of any highway safety issues with vulnerable road users.
- 2.447** Furthermore, given that the Welsh Government guidance “Setting exceptions to the 20mph default speed limit for restricted roads” was not published until November 2022, or suitable funding to undertake surveys to quantify the “frequency” of pedestrians and/or cyclists and motor vehicles mixing, officers used a combination of local knowledge, 3-year collision history involving vulnerable road users and recent surveys held.
- 2.448** Paragraph 2.1.3 outlines the two principal questions, A and B, that should be considered by highway authorities when deciding whether a 30mph exception should be made.
- 2.449** Whilst it is not a mandatory requirement to apply these questions to exceptions, they were used and considered with all of the proposed exceptions. Unfortunately, the guidance is vague in the use of some its statements, including the use of the word “significant” or “potential”.
- 2.450** ***Question A: are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?***
- 2.451** There is no definition, or statistical value of what the Welsh Government deem as “significant”. Furthermore, there was no forecasting model, or increase factors in the guidance, to quantify what “potential” numbers of pedestrians and cyclists would use the road if the speeds were lower.
- 2.452** It is also noteworthy that paragraph 2.2.10 within the Place Criteria states: *“however, highway authorities continue to have the flexibility to set local speed*

limits that are right for individual roads, reflecting local needs and considerations”.

- 2.453** Based on officer experience of the very poor uptake in numbers using the many shared-use active travel routes provided, officer assessments were empirical.
- 2.454** ***Question B: if the answer to A is ‘yes’, are the pedestrians and cyclists mixing with motor traffic?***
- 2.455** Where it was felt that the mixing of pedestrians and cyclists with motor traffic justifies the route becoming 20mph, that approval was subsequently made.
- 2.456** The exceptions guidance provided by the Welsh Government has been interpreted in a consistent, reasoned, and proportionate manner to determine which sections of road on the ‘A’ and ‘B’ route network should become “exceptions” and remain 30mph.
- 2.457** Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate amendments or finessing of speed limits where required. It will be the Councils intention to monitor the new speed limits, to take onboard any comments or concerns and determine whether changes should be made based on a revision of the existing Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.”
- 2.458** **Concern 32 – Ystradowen (T/23/10/WS)**
- 2.459** Ystradowen- I disagree with the proposal to make the village of Ystradowen an exception to the 20mph proposal. The village has a number of school age pupils who catch buses to Cowbridge High and Ysgol Bro Morgannwg. The beer garden at the front of The White Lion is often teeming with families and young children. 20mph is vital for kids’ safety. As noted, we should be implementing the same speed limit as Aberthin- especially given that our village is significantly larger with regards to population and the number of residents under the age of 18. The school bus crash of the early 2000s is still seared in the memory of Ystradowen’s long-standing residents. Act now or repent!
- 2.460** This road already sees multiple vehicles speed through the village. Only being slowed down when we have the speed camera vans here. The village now has a large population of children, all of whom have to cross this busy street either to catch buses to school. Or to use the astro and parks in the village. Aberthin got a 20mph limit for a pub, but we won't get one for the safety of our children?
- 2.461** I am absolutely shocked that you are considering applying an exemption to the 20mph speed limit on the A4222 that runs through our village, ystradowen. The speed that vehicles come through our village is outrageous and is very very dangerous for the school children that wait on that road or walk along it to go to the garage. If you let that road remain a 30mph people will just continue to put

their foot down when coming off the 60mph as they do know. There is no reason at all that we should be treated any differently to Aberthin. At least if it was 20mph people might slow down to something closer to 30mph! The lay-by by the bus stop is a police speed camera spot so this proves that it is a problem area. My husband also took part in a speed watch scheme last year and was shocked to record some vehicles at 60mph! Please reconsider your decision on this and make ystradowen a 20mph road along with other villages in the vale. We are a large village with lots of young families with children, please protect us from speeding vehicles.

- 2.462** The road through Ystradowen is sandwiched between National speed limit and 40 mph, there are 2 bus stops and narrow pavements regularly used by school children with a lot of heavy traffic. A high proportion of traffic regularly exceed existing speed limit so it definitely needs to be a 20 mph zone.
- 2.463** Ystradowen should be 20mph!!! People Drive through at a speed currently that would easily Kill a child, of which there are many walking around!
- 2.464** The current 30mph is ignored by so many drivers. Cars and lorries drive too fast through the village. I stand at the bus stop with my children daily and observe cars driving far too fast. They overtake the buses and ignore the fact that children are walking on pavements alongside this busy road. I also walk my dog along the pavement along with so how are children expected to utilise the amenities at the village hall and football pitch if they cannot walk there safely. There are no measures in place at the moment to slow this traffic and I fear that it is only a matter of time before a tragedy occurs.
- 2.465** The road through Ystradowen has 2 bus stops used daily by school children and narrow pavements yet the majority of people currently drive through the village at over 40 / 50 mph. Please consider reducing this section to 20 mph in the interests of keeping our village safe.
- 2.466** Should be made as 20mph on main road due to risks to children. I have seen children almost being hit by oncoming traffic whilst crossing over.
- 2.467** People drive at excessive speed throughout the village. There are many children that board/exit School transport, as well as many children travelling the pavements to access the village amenities. The risk of an accident is significant due to the excessive speeds people travel through the village.
- 2.468** My house is situated one house in from the main road running through Ystradowen. From this view point, I get to see not only the volume of traffic travelling through the village at all times of day, but the speed of the traffic. Whilst some adhere to the 30mph speed limit, it is very obvious that many do not. Lorries, particularly quarry lorries, cars and vans hurtle through the village at breakneck speed with no care or thought towards pedestrians, be they dog walkers, families, elderly residents or school children. At 30mph, the majority

passing though are well exceeding that - 40/50mph would be a well guessed estimate. The road through Ystradowen is an accident waiting to happen. It begs the question, as to why during the soon to be introduced 20mph initiative, is Ystradowen being left off the list and discriminated against. Aberthin, just down the road have achieved a 20mph status months in advance of its countrywide roll out. Ystradowen is in greater need as we have no natural 'sharp' bend in the road to help slow the traffic and we have a lot of pedestrian traffic walking to and from the pub, community centre, play area and church. If a 20mph speed limit were enforced, at least there could be more of a likelihood of motorists driving nearer to the 30mph speed limit, as most won't drive slowly, as can be seen in Aberthin. In essence, I am extremely concerned that if the traffic speed isn't included in this traffic slowing initiative, that one day somebody or something is going to seriously hurt or killed and I hope to goodness that it's not me, my family or my beloved pets.

- 2.469** Ystradowen should 100% receive the 20 mph limit as we see on a daily basis vehicle's of all shapes and sizes constantly speeding through our village. Something needs to be done to resolve this before someone gets hurt.
- 2.470** Narrow footpaths and there is an area with no footpath through the village. there are school bus drop of points in the village and children when they get of the buses it can be a very dangerous time for them Cars frequently speed through the village and bearing in mind the recent fatality on the a48 on 7 July 2023 -I find it unsafe turning right out of my road as cars pick up speed coming down the hill The speed limit should drop to 20mph in ystradowen.
- 2.471** The road through Ystradowen has seen a number of fatalities over the years. That's reason enough to slow traffic given 20 mph is less likely to kill. The road is used for school buses and children are at risk. Aberthin already sets a precedent for a 20 mph speed limit on a stretch of road where it is not possible to do 30 given the sharp corner. Speeding is common in the village with several blind exits. This is dangerous. Ystradowen must not be left out of a 20 speed limit.
- 2.472** I live facing the main road through ystradowen. There are plenty of vehicles passing through obviously not sticking to the 30mph limit. If this can not be decreased to 20mph maybe it can be looked into putting other measures in place like average speed cameras like they have done elsewhere. Think that could be a happy compromise.
- 2.473** Ystradowen needs to fall under the new 20mph regulations. HGV traffic and all manner of fast vehicles use the main road running through the village and school children are being put at risk as they use the school bus stop abutting the main road.
- 2.474** This road is very dangerous. There is a school bus stop and 2 public bus stops on the road side. School children fill the pavement and often perilously spill onto the road at school pick up and drop off times. A terrible accident waiting to

happen given the speed of cars through the village. Young children cross the road to the village hall and children's playground.

- 2.475** I disagree with the speed limit of 30mph remaining on Cowbridge Road through the village. Vehicles already drive excessively fast on this road. There are two bus stops (used by school buses) and narrow pavements on this road.
- 2.476** This road should be 20 Mph, cars do not slow down to 30, the pavements are very narrow and it always feels quite dangerous. The cars already go through our village at 40. - 59mph and above. with narrow pavements and school bus stops this is extremely dangerous speed through village already. 30'mph is not followed already! people do not follow the 30 mph speed limit now - so this will not be followed under new scheme. we have evidence of cars speeding over 45mph through the village even whilst school children standing on narrow pavements Most traffic speeds dangerously through this village, so much so they often don't stop at the pelican crossing when the lights are red. There are a lot of children in the village and walkers and it's incredibly dangerous. I think it is irresponsible to not include ystradowen in the 20mph law change. Please don't wait for a tragedy to happen before this change is made
- 2.477** I have significant concerns over the safety of the main road through ystradowen. In recent weeks there has sadly been a fatal accident just before the village and the pavements throughout are perilously narrow. Due to being a rural community the only places we or our children can walk to are the local garage/shop or pub which all require walking at the side of the main road. It makes no sense at all to have a different speed through our village and indicates a "less important" signal to drivers which is a huge oversight. The community council have worked tirelessly to try and maintain safe driving on this road including signing up to volunteer schemes and this decision in no way supports their efforts. Have the planners of the scheme visited the village to assess the risk and understand the community? Most of which are either young families or vulnerable elderly. I know the community council or any of us who volunteer to support our village would be happy to assist. Thank you
- 2.478** The road running through the village of Ystredowen should be 20mph. Cars travel at excessive speeds on this section, there are many children that use that road for their school bus, it is not safe. Traffic cameras are often used
- 2.479** Drivers continue to speed through Ystradowen. It is imperative that the speed limit is reduced to 20mph to ensure the of our children.
- 2.480** I feel the speed limit through Ystradowen should be 20mph. We have children walking and playing in the area. cyclists use the road. It is a very busy road and people do speed. 20mph would make it safer. Other areas have the 20mph limit. Aberthin for one; cars come from a country lane to 30mph to 20mph and it has proven a success. I wish the same for Ystradowen.

- 2.481** The speed limit through ystradowen should be 20mph, not 30 as you are suggesting. The speed cars drive through now with it being 30mph an accident is likely to happen so strongly urge you to change it to 20mph
- 2.482** I strongly believe the main road through ystradowen should be 20mph. The road through Ystradowen also needs to be 20mph. This is a disaster waiting to happen with cars speeding past every day.
- 2.483** Silly decision not to have this road as a 20mph zone. There are bus stops, of which serve two schools. Children attending Llansanor Primary wait at the side of this road for the morning bus and get off in the afternoon. Cars regularly going fast around the corner leading to the bus stops. The single pavement leading from the village to the petrol station/shop is very narrow with overgrown hedges. This cause pedestrians to have to step into the road which is highly dangerous. There are regular attendances by police and Go Safe on this road which is a clear indication that vehicles regularly speed along here and safety risks have been noticed. The reduction to 20mph would only add 28 seconds to a journey through Ystradowen and so keeping it as a 30mph does not provide a significant advantage over the risks and dangers it already poses to pedestrians. This road should be 20mph.
- 2.484** People drive through the village far too fast and it is very dangerous to all the children that live in the village. The pavements are also very narrow, should definitely be 20 miles an hour.
- 2.485** I understand that the plan for the main road (A4222) through Ystradowen is not to change to 20mph. I object to this Drivers speed through the village - it is an accident waiting to happen. The A4222 should also be considered as a 20mph zone.
- 2.486** Living on the main road, we are sadly so used to seeing people speeding through our village with no consideration for residents and school children crossing the road.
- 2.487** I object to the exception, the road that runs through Ystradowen splits one side of the village from the other, with the majority of residents in Ystradowen being young families with very young children is it an absolute disgrace that the Vale council could even think about allowing our village to be an exception to the new 20mph proposal. One side of our village we have a beautiful play area for toddlers, Astro turf and village hall, all of which is accessed by village children and families who live the other side of the road, meaning to get to use all of these wonderful facilities we have to cross this horrific road where cars do not even abide by the 30mph rule. It is so dangerous, and now even more so with the pub and the increased footfall and traffic in the village. I live very close to the main road and would like to add that the noise pollution is getting worse and worse by the day with large heavy lorries from the quarry passing through at speed! I believe Ystradowen should be no exception to the 20mph rule and it will be an utter disgrace of this is approved!

- 2.488** I am objecting to the proposals to keep the A4222 through Ystradowen as a 30mph zone and that that it should be a 20mph zone. Vehicles speed very dangerously through this area where many children and young families live. Many children wait at the bus stop and the speeds through the village are unsafe. I believe it should be treated in the same manner as Aberthin which is also a small village on the outskirts of Cowbridge.
- 2.489** Traffic travels through Ystradowen well above 30 mph. The speed limit needs to be reduced with more frequent monitoring.
- 2.490** The main road through Ystradowen should not be an exception to the 20mph speed limit, it should be included in the 20mph speed limit to improve safety for village residents . Vehicles are frequently observed at exceeding the current 30mph speed limit. A reduction would encourage motorists to reduce speed to a safer level. There is frequent crossing of the road at various intervals to access the amenities of the village - petrol station , postbox, 2 children’s play areas on opposite sides of the road and at both ends of the village hall, the pub and church. The pelican crossing is well used but is not centrally placed. A reduction to 20mph gives people more time to cross the road safely where it is not practical to cross side roads and walk inclines to use the pelican crossing. There is a lay-by on one side of the road for the buses to stop (although generally the buses stop on the road). The road has been altered and narrowed on the other side of the road to facilitate a bus stop . This is also on the brow of the hill. Drivers do not have a clear view to overtake buses that are stationary whilst passengers alight or disembark. A reduction to 20mph would improve safety around these bus stops A reduction to 20mph would reduce gas emissions in the village.
- 2.491** Objecting to Ystradowen being excluded. It should be included in the 20mph zone.
- 2.492** I believe that the section through Ystradowen should be assigned a speed limit of 20mph. Children are often walking / scooting along this road and there is a tendency for cars to speed through the village.
- 2.493** This is a main road where cars speed through the village where many children are walking through Safety. Children use the road a lot, and lots of blind corners and junctions, and many people use the road at speed currently anyway.
- 2.494** The road through Ystradowen already has problems with people driving too fast. There are many children in the village and there is a high number of residential houses either side of the road. Although there is already a crossing mid village there are numerous other places where many children and adults will need to cross the road. It should be included in the 20 Mph scheme- the same as Aberthin which already has a 20mph limit.

2.495 Dear Mr. Clogg, I am writing on behalf of Penllyn Community Council to object to the proposal by the Vale of Glamorgan Council (VoG) to apply a Traffic Regulation Order (TRO) in Ystradowen to Cowbridge Road (A4222) which would maintain the 30mph speed limit running through the village. We have attended several meetings where the proposals have been explained including one with the Welsh Government Minister, Lee Waters. We have read carefully the Welsh Government's publication 'Setting exceptions to the 20mph default speed limit for restricted roads: How highway authorities can set exceptions to 20mph speed limits on restricted roads in Wales' and the principles set therein on how an exception should be applied. We have also read the Statement of Reasons published in the Vale of Glamorgan Council (Various Roads 20mph and 30mph Speed Restriction) Revocation and Exceptions Order 2023 which states that the VoG's reason for maintaining the 30mph is the need to maintain the existing speed limit on selected strategic roads including part of the A4222 as a 'strategic route with higher volumes of daily traffic compared to urban residential streets and as such to not meet the criteria or the nature of a road with a speed limit of 20mph. The Council considers that the existing 30mph speed limit is an appropriate speed limit in order to maintain a reasonable traffic flow on higher traffic volume strategic routes.' Penllyn Community Council argues that the VoG has failed to interpret the Guidance correctly and is acting unlawfully in maintaining the 30 mph. First, the Statement of Reasons does not give any 'robust evidence' for its claim that a reduction to 20mph would lead to an unreasonable flow of traffic on this 'strategic' route. Second, it does not indicate how it has taken into account 'local factors.' The TRO sets out a blanket Statement of Reasons covering the whole of the Vale of Glamorgan. Third, at no point in the TRO does the VoG explain how it has interpreted the Guidance, specifically the Section 2.1 and how Questions A and B have been interpreted in relation to Ystradowen. It appears no consideration has been and likely to grow further. Recent developments have brought a considerable number of young families with children to the village who like to access the community centre and Parc Owain which has a MUGA, an U7s children's park, a pétanque piste and open space for children to play and cycle and for residents to walk their their dogs. At present, parents and grandparents are reluctant to allow their children to cross the busy main road alone as motorists and lorries frequently exceed the current 30 mph speed limit at all times of day including when children are waiting for and descending from the school bus. Some motorists have been known to accelerate rather than slow down when they see someone about to press the button for the pelican crossing so they can beat the lights! The Statement of Reason given in the TRO implies that the more our village grows (and planning for future developments are pending) and the more traffic that will be generated, the less likely we will be able to have a 20mph speed limit. As stated, this is contrary to the underlying aim of the legislation to encourage motorists to drive more slowly so that 20mph becomes the norm. In turn this will lead to more walking and Cycling by residents in a safer environment with lower emissions. It is acknowledged by Welsh Government that the reduction to 20mph marks a radical change and will be the start of a huge cultural shift which will take time to embed. However, there is strong evidence from Welsh

Government's pilot studies that the policy will achieve its aims and change people's behaviour or the better. Penllyn Community Council and the residents of Ystradowen who they represent are fully in favour of the new policy and want their community to benefit from this Welsh Government policy which will improve the quality of life for all. Yours sincerely, Councillor Sara Howells

- 2.496** People are speeding through the village on a regular basis and being a mum of young children who lives close to the road it makes me extremely anxious and annoyed. It needs to be 20mph through Ystradowen before someone gets killed.
- 2.497** Many people come through much quicker than 30mph, perhaps 20mph signs will slow them down as they do in Aberthin.
- 2.498** The main road through Ystradowen is currently 30mph, however very few people stick to this limit and often drive at speeds vastly exceeding it. There are a lot of young children in the village, the main park and football pitch are across the road from most of the houses and it can be absolutely lethal attempting to cross; even just walking among the main road can be scary with a toddler due to the speed that some people drive past. I feel if this road was a 20mph limit it would help to encourage some people to slow down.
- 2.499** Ystradowen is a village with a large child population and the community hall (located just off the proposed exception route) has a very active user base of all ages. As a ribbon village the majority of pedestrian traffic is along the road in question, and there are in particular a lot of pedestrians crossing the road opposite the community centre (and the White Lion immediately adjacent) where there is no crossing facility. Further, that part of the road is in a dip from both directions, limiting visibility for oncoming vehicular traffic. Immediately to the south of this crossing where there is currently a transition from 40mph to 30mph many drivers are already slow to respect the change in speed limit, particularly some of the lorries heading to the nearby quarry and industrial estate. Instituting the 20mph limit would hopefully curb some of these drivers and make this crossing area much safer. The opening of the new primary school on the Cowbridge Comprehensive site, along with the proposed new housing developments in Ystradowen, are likely to lead to a marked increase in pedestrian (and bicycle traffic in the village, particularly around school bus pick up/drop off times (and including younger children who are less aware of traffic)). The TRO lists the proposed distance of this exception as 722m. By my calculations the additional time incurred by a driver proceeding at 20mph instead of 30mph will only be an extra ~25 seconds added to their journey! I find it hard to believe that saving that inconsequential amount of time is a reason to apply an exception to reducing the speed limit on this road.
- 2.500** Such a dangerous road for all as motorists speed through the village with no consideration for pedestrians in the village. With new housing development more and more young families with children are using the road to cross over to use the village hall and playground facilities.

- 2.501** Please accept the 20mph through Ystradowen, someone is going to get run over soon the speed they drive. There are many kids in the village too 20mph is needed in Ystradowen.
- 2.502** I would like to see a 20mph limit through ystradowen Village (Cowbridge Road) to try and reduce the speed hat cars travel through.
- 2.503** I support the Cowbridge Road (A4222) being 30mph through Ystradowen IF drivers would stick to that speed limit but currently many do not. Rather than drop the limit, would it be possible to site average speed cameras through the village?
- 2.504** This is a complete waste of time. People who speed in a 30 will also speed in a 20. In my 18 years in the village there has only ever been on accident, when a girl ran into the road off a bus. She had minor injuries.
- 2.505** The traffic regularly over 40-45 through the village. Trucks and even buses abuse the limits and are dangerous. to keep it at 30 limit will be dangerous. South Wales Police are regularly doing camera work due to regularly doing camera work due to regular complaints. I'm a retired Traffic officer
- 2.506** Ystradowen is small village with lots of young children. The road is currently 30mph, but cars often drive much faster than this, so is very hazardous. Changing the road to 20mph would be much safer for all residents, especially when there are two children's parks in the area.
- 2.507** The road through Ystradowen is very busy. Not to mention that the local pub, Garage & shop, church and village hall are all situation on this road. The village has a large amount of children using the pavement either either side of the road and most of these children cross the road to use the 'multi use sports area' situated on the opposite side of most of the houses. It's seems ridiculous to not include this road within the 20mph plans and make this much safer for all that reside here.
- 2.508** I am writing to state our objection to make Ystradowen exempt. I see no reason why this decision has been taken and consider this an invitation to those who use the road through the village purely as a transport route to continue to exceed the current speed limit. There are frequent near misses when children and young people are crossing the road to use the school transport. Our young people and those who are reliant on the village garage amenities regularly walk along this road and ignoring the potential risk of a significant RTA seems ridiculous.
- 2.509** Too risky. Lots of children and families in the village now. Kids walk/cycle to Astro so needs to be 20 also pub has meant more people too on side of road. I am writing as Chair of the Ystradowen residents' association, the Ystradowen Community and Sports Association (YCSA), to object to the proposal by the Vale

of Glamorgan the speed limit on the main road running through the village at 30 mph. The reasons given by the Council to justify their decision do not provide adequate evidence and fail to take into account local factors including how people use the village facilities and have to cross a very busy road to do so. The YSCA do not see how these reasons meet the guidance on exceptions set out by the Welsh Government. Indeed, the exception seems to run counter to the aim of the legislation. The YSCA run the village community centre which is hub for a range of activities for all age groups in the village. Many villagers walk to the centre and the adjacent facilities including the local church, pub and Parc Owain which has a MUGA, children's play area and boules piste. The A4222 is a very busy road and motorists frequently exceed the 30 mph speed limit and at all times of day. Enforcement by Go Safe Wales only happens a few times per year and is by no means a sufficient deterrent. Requests made to the Council for speed calming measures have been ignored. It is implied that a fatality is needed before any action can be taken. We want to avoid this at all costs and this new legislation could be the answer. It is a shame that no consultation has been undertaken with YSCA or with residents of Ystradowen. It would have been clear to the Council that residents are extremely keen to have a 20 mph on the main road through the village and support the Welsh Government's policy.

- 2.510** I can see no reason to exempt ystradowen from 20mm limit. It is a residential area with a high number of children and elderly residents. It is flanked by towns / villages with 20mm h restrictions (aberthin and Pontyclun) along the same road. There are no other traffic calming measures in the village and there are incidents of pedestrians being injured. Reduction to 20mm h through the village will not significantly affect traffic flow any more than it does through Pontyclun and aberthin.
- 2.511** The A4222 passes through Ystradowen and should remain at 20mph for the following reasons: The road is used a lot by pedestrians, including young children, and there is not a continuous pavement on both sides of the road which means accessing the community facilities (community centre/Parc Owain) presents a danger. The road has incorrectly been designated a strategic route - the same road running through Aberthin to the South has a 20 mph limit with exactly the same volume of traffic. There are a number of junctions where there is limited visibility of the main road, including the entries and exits of the petrol station, and in terms of safety the lower limit is the only acceptable option. The lower limit also reduces the amount of air pollution, a key aim of the government.
- 2.512 Officer response 32.**
- 2.513** Reference should be made to Officer response 2 regarding the Council's considerations and interpreted of the Guidance provided by Welsh Government for "Setting exceptions to the 20mph default speed limit for restricted roads".

- 2.514** The A4222, Ystradowen meets the Place criteria and addresses principal question ‘A’ because of the presence of a Village Hall (Criterion 2) within 100m of the Cowbridge Road, however, there is minimal direct residential frontage (Criterion 4) with most dwellings being access from sideroads and therefore Criterion 4 of the Place criteria is not met. It is also the case that the A4222 is a strategic route between Rhondda Cynon Taff and the Vale of Glamorgan with 40mph and National speed limit out of scope roads on both approaches to the village.
- 2.515** The only additional attractor is the White Lion public house within 100m of Cowbridge Road and, as such, it is considered that a significant numbers or mixing of pedestrians and cyclists is not substantiated by the venues locally within the village irrespective of Criterion 2 being met. There are also good, protected facilities in the form of footways and a controlled crossing meeting ATAG generally on the desire line to the village hall and public house to cater for safe pedestrian movements and no highway safety issues involving vulnerable road users. Paragraph 1.1.2 of the Welsh Government Guidance states: “this guidance is intended for local interpretation by highway authorities to make evidence-based decisions on setting exceptions to the default speed limit of 20mph on restricted roads in Wales, which will come into force on 17th September, 2023.
- 2.516** Paragraph 2.1.1 states: “a 20mph speed limit should be set where pedestrians and/or cyclists and motor vehicles mix in a frequent manner, except where strong evidence exists that higher speeds are safe”.
- 2.517** Paragraphs 2.2.18 states – exceptions may be appropriate where there is significant demand (or potential demand) for walking and cycling so long as the highway authority is satisfied that the answer to Principal Question B is ‘no’ (see 2.1.3) and people on foot and cycle are not required to mix with motor traffic.
- 2.518** It is also noteworthy that paragraph 2.2.10 within the Place Criteria states: “however, highway authorities continue to have the flexibility to set local speed limits that are right for individual roads, reflecting local needs and considerations”.
- 2.519** Welsh Government Guidance document is not mandatory and is guidance only. Whilst it was used to consider all proposed exceptions, local knowledge and interpretation was used in the decision making process. Based upon the above information, the reasoned and proportionate considerations, and methodology, it is deemed appropriate for the road to be an exception and maintained at 30mph.
- 2.520** It is proposed that further assessments should be undertaken for the A4222, Ystradowen post the 20mph implantation in accordance with proposed updated guidance for “Circular No: 24/2009 - Setting Local Speed Limits in Wales”, to review and gather further robust evidence to determine the mixing of

pedestrians and cyclists with motor traffic and ensure that as far as reasonably practicable the speed limits on this section of the A48 are suitable for the conditions including usage.

2.521 Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate amendments or finessing of speed limits where required. It will therefore be the Councils intention to monitor the new speed limits on all exception roads, to take onboard any future comments or concerns and determine whether changes should be made based on a revision of the existing Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.”

2.522 Concern 33 – Cowbridge (T/23/107/WS)

2.523 Darren (Gibbets) Hill is a slip road and should not be 20mph.

2.524 Officer response 33.

2.525 The proposed section of Darren Hill to be reduced to 20 mph will provide safer sustainable links to the High Street and sustainable links being constructed as part of the Clare Gardens Development which will link directly to Darren Hill.

2.526 It is the Council’s intentions that the reduced speed limit over this section will NOT be implemented until:

1. We have implemented the new speed limit along the bypass which is programmed for later this year which will see the speed limit dropped to 50mph with a section approaching the roundabout dropping to 30 mph.

2. The sustainable links within the Clare Gardens development to Darren Hill have been fully implemented.

2.527 Concern 34 – Penarth (T/23/109/MS)

2.528 This section should be 20mph at least until the far side of the roundabout (nearer Baron Court), the traffic is frequently backed up here anyway. Pedestrians struggle to cross the road at the roundabout - it is a key pedestrian link between Cogan station/Penarth generally and Penarth Marina. For cyclists also it is a key route with no alternative from the Pont y Werin to Penarth Town Centre/Andrew's Road for links to up Merrie Harrier and roundabout were slower. It does not meet the Welsh Governments criteria for exemptions.

2.529 Lower Windsor Road is a hazardous commuter route lined with parked vehicles with extreme air pollution. When not totally congested residents and pedestrians are subject to dangerous speeding vehicles. This road should not be excepted and certainly should be subject to 20mph. Schemes should be devised to enhance safety, public transport and active travel.

- 2.530** I fully support limiting ALL residential roads to a 20 mph limit. Although I often drive along Windsor Road, I see no reason to exempt it from a 20 mph limit. It is a residential road and its residents deserve the benefits that a 20 mph limit will bring in terms of lower noise and pollution and enhanced safety. If the intention of the speed limit is to reduce the risk of injury I wonder why this stretch of road is to be exempted? It's one of the busiest roads in Penarth and there are pedestrians.
- 2.531** An exemption on Lower Windsor Rd makes no sense at all. It's a bottle neck at peak times with queues and as a result. Street parking makes it very narrow exiting Penarth just after the rail bridge. The view down the road is restricted by the bridge and the curve in the road. Cyclists coming into Penarth are very exposed. A lot of school students walk to school. It's a residential street with high levels of pollution. If anything there needs to be work looking at reducing traffic volume while speeding up the transit times for Public Transport. This would make the bus more convenient especially if the Health Hub is to be sited at Cogan Leisure Centre and improve air quality.
- 2.532** 20 mile and hour needs to be brought in to Windsor road ASAP before there is a fatality speeds are often in excess of 40 miles an hour.
- 2.533** I note that VOG are proposing an exception to the 20 mph limit on Windsor Road from the junction of Andrew Road - in a south easterly direction for 437 metres. This is a residential area with heavy traffic that has previously recorded unhealthy carbon monoxide levels from car pollution. 30 mph cannot be appropriate in such circumstances. You have put forward no reasoned case for setting a speed limit 50% higher than the norm and would ask VOG to reconsider this exception.
- 2.534** This proposed exception appears to fail many of the criteria set by by Welsh Gov for exceptions. The routes into Penarth are limited and Windsor Road is listed as an active travel route for walking with a high priority / short-term plan for VALE-SPR Future-005C (Cycle). This means there are significant numbers of both walkers and cyclists along this road. As a result, it fails Question A in the WG Guidance. It also fails Question B in the WG guidance as cyclists do mix with traffic the near whole length. The exception for this is a few meters at the south end where the most recent cycle lane (from the redone roundabout) will spit cyclists straight into the proposed 30mph exception. There are also significantly more than 20 properties per 1km with properties/retail premises on BOTH SIDES. While I appreciate the allotments on one side reduces the need for many pedestrians to cross, it does not change the fact that cyclists must cross the other lane of traffic at every junction along the proposed exception. Given the route into Penarth is on a hill cyclists are often traveling slower than they would on the flat and the blind corner under the railway bridge it seems a 30mph exception is at odds with nearly all the criteria set by WG including the Active travel legislation to encourage people from their cars. The road itself is also extremely narrow in places because of the parking which often means large

vehicles have to give way. The carriageway width reduction just south of the railway bridge has also caused several accidents most recently this week where the fire brigade and police had to attend. The road is also one of the most polluted roads in Wales and failing to encourage Active travel along this road will not help this. I have repeatedly tried to get the detail regarding this exception from the Vale of Glamorgan Council but have been delayed and fobbed off with generic responses.

2.535 The answer to the principal questions in the WG guidance documents is yes for both A and B for this section of road, on road cycle route without dedicated provision and the potential for a lot more cyclists if the speeds were lower. And a highly used crossing point with no pedestrian priority. The distance of approximately 265 metres is also shorter than the 300 metres WG minimum guidance.

2.536 High volume of queuing motor traffic, a key bottlenecks for travel from the Vale into Cardiff with more or less no active travel provision so cyclists on the road and few safe crossing points for pedestrians. Both Principal Questions are answered 'yes'. The segregated (shared) cycle path is not feasible to use when cycling into Dinas Powys (no accessible entry and exit points) so cyclists are on the road for this section.

2.537 Officer response 34.

2.538 Following representations from objectors and a subsequent detailed review by officers, it is considered that due to attendance at the popular Penarth leisure centre serving the wider community and the presence of existing cycle facilities along the upper part of the road encouraging cycling to use this route, it is likely and probable that Windsor Road in Penarth, which meets the Place criteria, will have significant pedestrian and cycle mixing with vehicular traffic flows. It has therefore been agreed that the proposed 30mph exception should not be progressed along Windsor Road between its junction with Plassey Street and Marconi Avenue. The schedule within the proposed Order will be amended as outlined at Appendix 'D'.

2.539 Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate amendments or finessing of speed limits where required. It will therefore be the Councils intention to monitor the new speed limits on all exception roads, to take onboard any future comments or concerns and determine whether changes should be made based on a revision of the existing Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.”

2.540 Concern 35 – Dinas Powys (T/23/110/WS)

2.541 I do not feel that such a heavily populated area, with no cycle paths should be exempt. It feels like a very dangerous stretch of road for cycling. Also many

people still speed towards the junction into Southra park particularly from the direction of Barry.

- 2.542** I feel that all of the cardiff road where there is housing directly adjacent to the road should be 20mph. This road is like a racetrack even with 30mph in place. I noticed that the 20mph restriction ends right by our house which means they will be speeding up right outside people's houses. Creating more noise and pollution than there already is. We suffer enough with the amount of unruly drivers on this road and the large lorries thundering down the road I feel it should be 20mph.
- 2.543** Barry Road entering Dinas Powys Y:170,556.619 X:315,444.5 this stretch on the entrance to Dinas Powys past Bryn Y Don up to Dinas Powys train station needs to be at 20mph. Cars come down this stretch far too fast. Plenty of cycles use this route and child Barry Road coming into Dinas Powys past cross common road up to the train station needs to be at 20mph. Children use this route to get to school via the buses. It's dangerous to cyclists and the area around it (ie Clos Derwen is built up with families), cars don't respect the current speed limits at all.
- 2.544** The Barry Dinas Powys road is already congested due to new housing developments. Reducing the speed limit will further add to the congestion.
- 2.545** I understand why Cardiff road is to keep it's current speed limit but I do think a speed camera should be put in place to catch speeding offenders. Quite often vehicles are not sticking to the 30mph limit and has caused accidents and many near misses plus its difficult and dangerous to cross the road to Bryn yr don and walk along the pavement towards the train station..there's to much overgrowth of trees along the path pushing pedestrians closer to the road edge
- 2.546** I would like to see the 20mph speed limit introduced in Dinas Powys Cardiff/Barry Road A4055 should be 20mph from the junction with Cross Common Road, all the way through Dinas Powys to the bus lane at Merrie Harrier end. The pavement next to this road is inadequate and it is a key walking route from Woodlands Estate/Southra Park to the train station and up to the village and St Andrew's school. Walking here especially with children is unappealing, a reduced speed limit will help this, and hopefully one day the road can be narrowed to provide more space for active travel. Traffic currently travels too fast on this section making turning out of the junctions particularly Station Road and Cross Common Road tricky, reducing the speed will help with this. It will also reduce the overall signage requirements and the consistency of 20mph in residential areas. I am not sure why there are two areas marked as 20mph on this plan as surely all the other streets will be covered by 20mph
- 2.547** My only objection is that there is no enforcement of the 30mph speed limit on Cardiff Road, cars consistently drive over 30mph and there have been many accidents by the vets. As part of this change, if parts of Cardiff Road remain

30mph I would expect drivers to speed up above what they already do to mitigate the speed loss in 20mph zones. Please consider speed cameras or other enforcement of the speed limits to protect pedestrians and other road users.

2.548 I think it should be 20mph along Cardiff Road, from the Cross Common Road junction to the bus lane near the Merry Harrier, in order to make walking/cycling safer & to make junctions easier & safer. Far less signs would be Needed this way too & it'll be simpler for motorists to comply

(1) I think the 20mph limit should begin before the Recreational Ground as you approach the south end of DinasPowys. This would improve safety and access to the Recreational Ground for those walking and cycling there. There is limited pavement access and you have to cross the road as a pedestrian.

(2) The 20mph exclusion also covers Dinas Powys station which is a pedestrian destination.

(3) The pavement footpath ends at Station Rd on the western side of Cardiff Rd. It would be safer for pedestrians crossing the junction at Station Rd for this area to be 20mph rather than a transition from 30mph.

(4) The 20mph exclusion covers high density residential areas, at least from the junction with Cross Common Rd, that all feed into the Cardiff Rd.

(5) Cardiff Rd is the main route for cycling, especially as a commuter, and there are no off road cycle lanes in this segment. Cyclists have to share the road with the traffic. The 20mph limit should apply at least where cyclists might join from the high residential areas (from the junction with Cross Common Rd).

2.549 The entire length of the proposed exception is on the planned Active Travel VALE-SPR-Future-001D for for walking and cycling and without segregated cycle paths and footpaths along the length of it should not have an exception as this will only discourage active travel. Your maps also fail to show the new Cross common road which joins further south and the new housing which extends south. This has increased the number of walkers and cyclists going up into Dinas Powys Village and Dinas Powys Station and clearly hasn't been considered as they are not shown on the map.

2.550 Completely surprised at this proposal. It doesn't meet any of the WG guidance for exceptions. The answer to the principal questions in the WG guidance documents is clearly yes for both A and B for this section of road which has no dedicated provision for cyclists and few safe crossing points for pedestrians. It also fulfils the Place Criteria for 20mph. It is a key active travel route for travellers from Barry moving towards Cardiff, including myself. Close and fast passes are very common, even on the blind bends though the village. The potential number of those walking and cycling this route is hindered by the volume and danger of motorised traffic - it is exactly these conditions that

'default 20' is intended to counter. By matching motor speed more closely to that of active travellers, potential harm is reduced.

2.551 The exception should end at Mathew Terrace as I don't believe the criteria set down by WG have been met as it goes into Dinas Powys. The route has over 20 properties per 1km meaning it should be 20mph. Plus the route is part of the proposed active travel route (VALE-SPR-Future-001D) which is short-term priority listed but will never be able to offer segregated cycleway protection meaning it will always have cyclists using the main carriageway as they do now. The section from Matthew Terrace towards the Merry Harrie has a segregated shared path which then meets the 30mph criteria. It appears the proposal takes the minimum 100m criteria to a school to the max meaning the staff entrance is less than 100m away and the main entrance less than 150m away. It appears the bullet point "regularly used accesses to schools or hospitals are along the road, even though this may be more than 100m from their main entrances" appears to have been ignored as this clearly is the road used along its length to access the school. Finally, the order states "From the centre point of its junction with Brookside" Does this mean there will be a traffic island built in the middle of Brookside (on the bridge) to erect this signage? Otherwise, it will be incorrectly sign-posted. If this order is to go forward unchanged surely it has to be one side or the other of the Junction!

2.552 Officer response 35.

2.553 Following representations from objectors, and subsequent detailed review of the exceptions criteria, it has been agreed an additional length of Cardiff Road, Dinas Powys meets the Place criteria and that the 30mph exception proposed should be amended to reflect a longer section of a default to 20mph due to the probability of significant pedestrian and cycle mixing. The schedule within the proposed Order will be amended as outlined at Appendix 'D'.

2.554 Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate amendments or finessing of speed limits where required. It will therefore be the Council's intention to monitor the new speed limits on all exception roads, to take onboard any future comments or concerns and determine whether changes should be made based on a revision of the existing Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales."

2.555 Concern 36 – Merrie Harrier Junction (T/23/111/WS)

2.556 The Bary Dinas Powys road is already congested due to new housing developments. Reducing the speed limit will further add to the congestion.

2.557 I understand why Cardiff road is to keep its current speed limit but I do think a speed camera should be put in place to catch speeding offenders. Quite often vehicles are not sticking to the 30mph limit and has caused accidents and many near misses plus it's difficult and dangerous to cross the road to Bryn yr don and

walk along the pavement towards the train station..there's too much overgrowth of trees along the path pushing pedestrians closer to the road edge

- 2.558** I would like to see the 20mph speed limit introduced in Dinas Powys.
- 2.559** This section should be 20mph until past the final house leaving Dinas Powys/where the bus lane starts and cyclists/pedestrians therefore are separated from the traffic by the bus lane. There are many houses on this road, well over the 20 per km referenced in Welsh Government guidance. The traffic here in both directions is often congested throughout the daytime so it will make little difference to journey times. There are numerous bus stops used by secondary school children and it is a key route to schools, train station and the village centre. Additionally extending the 20mph zone to this point will greatly reduce the overall number of signs needed as it will avoid the need to put a 20 sign on every road junction of which there are many.
- 2.560** I think it should be 20mph along Cardiff Road, from the Cross Common Road junction to the bus lane near the Merry Harrier, in order to make walking/cycling safer & to make junctions easier & safer. Far less signs would be needed this way too & it'll be simpler for motorists to comply.
- 2.561** I think the 20mph limit should apply through Dinas Powys with 30mph beginning at the bus/cycle lane at the north end of Dinas Powys. The exemption covers Eastbrook Station which is a pedestrian destination for the surrounding high density residential area and it is used by school children. Cardiff Rd is also the main route for cycling, especially commuter cycling, and there is no off road cycle lane. I think 20mph should be in place to make it safer for cyclists coming from the residential areas. The curve of the road near Powys Place and near Georges Row means that Lower Windsor Road is a hazardous commuter route lined with parked vehicles with extreme air pollution. When not totally congested residents and pedestrians are subject to dangerous speeding vehicles. This road should not be exempted and certainly should be subject to 20mph. Schemes should be devised to enhance safety, public transport and active travel.
- 2.562** I would like to see the proposed 30mph section extended along all Redlands rd and Lavernock Rd as it is the major route for traffic through Penarth to allow traffic to flow.
- 2.563** High volume of queuing motor traffic, a key bottleneck for travel from the Vale into Cardiff with more or less no active travel provision so cyclists on the road and few safe crossing points for pedestrians. Both Principal Questions are answered 'yes'. The segregated (shared) cycle path is not feasible to use when cycling into Dinas Powys (no accessible entry and exit points) so cyclists are on the road for this section.
- 2.564** **Officer response 36.**

- 2.565** Following representations from objectors, and subsequent detailed review of the exceptions criteria, it has been agreed an additional length of Cardiff Road, Dinas Powys meets the Place criteria and that the 30mph exception proposed along the A4055, Cardiff Road, Dinas Powys should be amended to reflect a longer section of a default to 20mph due to the probability of significant pedestrian and cycle mixing. The schedule within the proposed Order will be amended as outlined at Appendix 'D'.
- 2.566** Following representations from objectors and a subsequent detailed review by officers, it is considered that due to attendance at the popular Penarth leisure centre serving the wider community and the presence of existing cycle facilities along the upper part of the road encouraging cycling to use this route, it is likely and probable that Windsor Road in Penarth, which meets the Place criteria, will have significant pedestrian and cycle mixing with vehicular traffic flows. It has therefore been agreed that the proposed 30mph exception should not be progressed along Windsor Road between its junction with Plassey Street and Marconi Avenue. The schedule within the proposed Order will be amended as outlined at Appendix 'D'.
- 2.567** Where the objectors suggest the inclusion of 20mph speed limits in other areas, this could be considered as part of any future reviews. The Welsh Government is in the process of updating its guidance for "Circular No: 24/2009 - Setting Local Speed Limits in Wales". The Council will monitor and undertake reviews of roads within its local highway network where concerns are identified or as considered appropriate in the future based on the updated guidance when published by the Welsh Government and take appropriate measures to ensure that as far as reasonably practicable that the speed limits are suitable for the conditions, the needs of the local community and consistent with its published policy objectives. Any request for future changes to speed limit will be subject to budget and resource availability at that time.
- 2.568 Concern 37 – Westra, Dinas Powys (T/23/116/WS)**
- 2.569** I do not feel that such a heavily populated area, with no cycle paths should be exempt. It feels like a very dangerous stretch of road for cycling. Also many people still speed towards the junction into Southra park particularly from the direction of Barry.
- 2.570 Officer response 37**
- 2.571** Following representations from objectors, and subsequent review of the exceptions criteria, it has been agreed that an additional length of Cardiff Road, Dinas Powys meets the Place criteria and that the 30mph exception proposed along the A4055, Cardiff Road, Dinas Powys should be amended to reflect a longer section of a default to 20mph due to the probability of significant pedestrian and cycle mixing. The schedule within the proposed Order will be amended as outlined at Appendix 'D'.

2.572 Concern 38 – Cross Common Road, Dinas Powys (T/23/117/WS)

2.573 I am very supportive of 20mph generally, but I do not see the point of this tiny bit of 20mph. You can't go more than 20mph approaching the junction and it would be pushing it to go faster in the other direction so just seems a waste of signage and resources. If you were to have a 20mph zone anywhere round here it would be on the section of Sully Road between Watery Lane and the entrance to Cosmeston (Old Cogan Hall Farm) as this is a key walking and cycling link with two blind corners you have to turn across which is a nightmare on a bike. I would love to see the whole of Cross Common Road (and Sully Road) made into a 'green lane' with reduced speeds and priority to walkers, horses and cyclists but that is probably for another time. Just don't know why this bit of road has come into this consultation?

2.574 Officer response 38

2.575 The small section of 20mph speed limit being proposed on Cross Common Road is a slight extension to the existing default 20mph areas. The reason for this is to ensure that the 20mph terminal signs are in locations where they are easier to locate, have better visibility, or are locations of existing 30mph terminal signs that will become 20mph.

2.576 The section of Sully Road referred to is out of scope for this project, as it is not a restricted road, it is not subject to 30mph by virtue of street lighting and will not form part of the Welsh Government default speed limit to 20mph.

2.577 Concern 39 – St Nicholas (T/23/120/MS)

2.578 Hi. Fantastic you are investigating a separate cycle along the A48. I use this daily, but all colleagues in uhw Street are shocked I do without a lane. This will hopefully get a lot of use. But... proposals are for St Nicholas NOT to have one, AND be exempt to 30mph,so I object. I daily have close passes going east bound through St Nicholas (not do had west bound for some reason.

2.579 Officer response 39

2.580 It was determined that St Nicholas did not meet the Welsh Government's place criteria guidance, detailed below.

Place criteria:

1. Within a 100m walk of any educational setting (e.g. primary, secondary, further education and higher education).
2. Within 100m walk of any community centre.
3. Within 100m walk of any hospital.
4. Where the number of residential and/or retail premises fronting a road exceeds 20 properties per km.

- 2.581** The numbers of cyclists and pedestrians in St Nicholas are very low and would not be deemed 'significant'. It needs to be mentioned that the Welsh Government has not provided a definition, or statistical value of what they deem as "significant". Furthermore, there was no forecasting model, or increase factors in the guidance, to quantify what "potential" numbers of pedestrians and cyclists would use the road if the speeds were lower.
- 2.582** Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate any further amendments or finessing of speed limits where required. It will be the Council's intention to monitor the new speed limits, to take onboard any comments or concerns and determine whether changes should be made.
- 2.583 Concern 40 – Treoes (T/23/121/MS) & Llangan (T/23/65/WS & T/23/66/WS)**
We welcome these changes.
- 2.584** Our understanding is that the current 30 mph roads through the villages will change to 20 mph limit.
- 2.585** The proposed 20 mph limit order will replace the current 30 mph limit not currently mandated by street lighting. T/23/65/WS We welcome these changes. Additionally, we would propose extending the 20 mph Traffic Order along the un-named road through the centre of the village of Llangan, from the junction with Twchwch Garth eastwards to the junction with Cwrt Canna. The reason for this is to provide safety for pedestrians, runners, dog-walkers and cyclists and horse-riders who regularly use these lanes. We note that these users who wish to walk, cycle or ride, including pupils of Llangan school who wish to use active travel to get to school, are currently denied this opportunity because the road is narrow and unsafe. We believe this is an excellent opportunity to extend the speed limit now to create opportunities for people who wish to use active travel to safely commute to the school and further to Llangan and St. Mary Hill Village Hall. They are currently unable to do so. This proposal extends to drawing T/23/65/WS. We also propose a second extension of the speed limit from Llangan and St Mary Hill Village Hall to the national speed limit at the end of Heol Lidiard. This would encourage safe driving past the entrance to the village hall and near Heol Lidiard. Impact of Proposed Changes on other Rural Roads. Lastly, we would like to understand the impact that these proposals will have on the volume of traffic travelling through the villages of Llangan, Treoes and St Mary Hill.
- 2.586** Currently, the villages are used as "short-cuts" by commuters who are guided by their sat navs. These devices do not take into consideration the actual conditions of the environment and the state of these roads, only the routes and speed limits. We are concerned that dropping the speed limit in some areas will result in drivers being routed along other, country lanes, thereby creating undesirable consequences of increased traffic on narrow and unsuitable roads. We would

like to see the modelling that has been done around this and understand the impact.

2.587 Officer response 40

2.588 The un-named road between Twchwyn Garth and Cwrt Canna is out of scope as it is derestricted, it is not subject to 30mph by virtue of street lighting and will not form part of the Welsh Government default speed limit to 20mph.

2.589 The section of road fronting Heol Llidiard is subject to a speed limit of 40mph by traffic regulation order, as a consequence this road is also out of scope and will not default to 20mph and would need to be amended by Order in the future subject to review in accordance with relevant Guidance as well as budget and resource availability.

2.590 Any future amendments to speed limits will be subject to the requirements of an amendment of the current Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.

2.591 The 20mph default on restricted roads is a Welsh Government initiative. The Senedd approved with legislation to lower the default national speed limit on restricted roads from 30mph to 20mph and legislation was subsequently passed by Welsh Government where their legislation for the changes came into force on 12th July, 2022. Any concerns, or queries, relating to the consequential effects of imposing 20mph limits in rural villages and any modelling work to ascertain, or mitigate, its impacts on adjacent country roads is a matter for the Welsh Government.

2.592 The remit of Welsh Councils is to facilitate the necessary changes to signs and, lines associated with the change to the new default 20mph speed limit, as well as creating 30mph exceptions that would not be appropriate for 20mph in accordance with Guidance provided and published by Welsh Government.

2.593 Concern 41 – Wick (T/23/122/MS)

2.594 Comment 1:

2.595 I think the 20.mph speed limit should be implemented throughout the entire through road of the village. There are residents, many with young families, at either end of the village.

2.596 Comment 2:

2.597 The entire stretch should be 20mph. I live on the straight section and feel it's a drag strip most nights. The safety of children leaving the estate should be considered the most significant and road kill of loved pets is common on this

section. Why not place an average speed camera from the start of the village to the end on the Main Street. This would stop speeding.

2.598 Comment 3:

2.599 Please extend to include the whole main road going through Wick.

2.600 Comment 4:

2.601 People ignore 30 will do same at 20 as it is a straight road. Just know that people will ignore it. The road needs speed bumps or other calming measures.

2.602 Officer response 41

2.603 It was determined that part of the B4265 St Brides Road and the B4265 Llantwit Road, Wick, did not meet the Welsh Government's place criteria guidance, detailed below, therefore as shown on plan T/23/122/MS, part will default to 20mph, and part will be a 30mph exception.

2.604 Place criteria:

1. Within a 100m walk of any educational setting (e.g. primary, secondary, further education and higher education).
2. Within 100m walk of any community centre.
3. Within 100m walk of any hospital.
4. Where the number of residential and/or retail premises fronting a road exceeds 20 properties per km.

2.605 Welsh Government provided guidance on "Setting exceptions to the 20mph default speed limit for restricted roads", officers reviewing the proposed exception sites, fully understood the Welsh Government guidance and applied the two-stage test accordingly.

2.606 Consideration was given to existing cyclist and pedestrian flows along the B4265 St Brides Road and the B4265 Llantwit Road the main road through the village of Wick, and from experience, local knowledge, history of road traffic collisions, composition of traffic, a determination was made to retain those speeds at 30mph.

2.607 South Wales Police and GoSafe fully support the legislation change on 17th September, 2023, and have ensured the delivery of a consistent, fair and proportionate approach to enforcement of the new speed limit.

2.608 As with all new speed limits, there will be a period of assessment following their implementation to ascertain their suitability.

2.609 Any future amendments to speed limits will be subject to the requirements of an amendment of the current Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.

2.610 Concern 42 – Broughton (T/23/125/MS)

2.611 Comment 1:

2.612 Please extend to include the whole main road going through Wick.

2.613 Comment 2:

2.614 Whilst I would normally support the limitation of 20mph to the village centre, the unique nature of the main road Road through Wick I believe warrants it to be 20mph throughout. Driver behaviour (cars and motorbikes) is currently such that as soon as they come round the bend onto the straight road sections either side of the village they accelerate. I believe this will be exacerbated by stepping up from 20mph to 30mph at these points. The police patrol motorcycle typically captures 30-40 speeding motorists an hour when he is on this section of Llantwit Road, demonstrating the existing behaviour. In addition there are multiple blind junctions and no pathways on this straight section of road so people including children and animals are frequently walking along the road.

2.615 Officer response 42

2.616 These comments relate to Wick and the incorrect plan reference has been quoted by the respondents. Therefore, to clarify this response relates to plan reference T/23/122/MS Wick.

2.617 It was determined that part of the B4265 St Brides Road and the B4265 Llantwit Road did not meet the Welsh Government’s place criteria guidance, detailed below, therefore as shown on plan T/23/122/MS, part will default to 20mph, and part will be a 30mph exception.

2.618 Place criteria:

1. Within a 100m walk of any educational setting (e.g. primary, secondary, further education and higher education).
2. Within 100m walk of any community centre.
3. Within 100m walk of any hospital.
4. Where the number of residential and/or retail premises fronting a road exceeds 20 properties per km.

2.619 Welsh Government provided guidance on “Setting exceptions to the 20mph default speed limit for restricted roads”, officers reviewing the proposed exception sites fully understood the Welsh Government guidance and applied the two-stage test accordingly.

- 2.620** Consideration was given to existing cyclist and pedestrian flows along the B4265 St Brides Road and the B4265 Llantwit Road the main road through the village of Wick and from experience, local knowledge, history of road traffic collisions, composition of traffic, a determination was made to retain those speeds at 30mph.
- 2.621** South Wales Police and GoSafe fully support the legislation change on 17th September, 2023, and have ensured the delivery of a consistent, fair and proportionate approach to enforcement of the new speed limit.
- 2.622** As with all new speed limits, there will be a period of assessment following their implementation to ascertain their suitability.
- 2.623** Any future amendments to speed limits will be subject to the requirements of an amendment of the current Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.
- 2.624 Concern 43 – Ewenny (T/23/126/MS)**
- 2.625** Ewenny Cross is a dead-end culdesac under every criteria set by WG this should not have a 30mph exception. Wick Road has a significant number of properties along both sides of the road which way in excess of 20 per 1km criteria where no 30mph exception should NOT be applied.
- 2.626 Officer response 43**
- 2.627** The Exclusion of the short length of Cul de sac (Ewenny Cross) for consideration is an oversight as part of the mapping process associated with identification of exception site. (30mph limit to default to 20mph).
- 2.628** Arrangements have been made to rectify this error which will be reflected on the data Map Wales and the length of road being removed from this exception site.
- 2.629 Concern 44 – Pontypridd Road, Barry (T/23/127/MS)**
- 2.630 Comment 1:**
- 2.631** I am specifically rejecting plans to keep St Nicholas road, Broad Street, Pontypridd road and fford y milleniwm at 30mph. St. Nicholas rd and pontypridd road are both residential streets that are also main routes to some of the.
(comment not complete)
- 2.632 Comment 2:**
- 2.633** Some of the exempt roads would not require an exemption (I.e Pontypridd road, Gladstone road) yet other roads like Trinity Street and Tynewydd Road would be

impossible to drive at 20mph due to the steep incline; these should be exempt. This will just cause excessive emissions with people either stalling constantly or speeding in order to actually get up the hill. The whole 20mph roads is ridiculous anyway

2.634 Comment 3:

2.635 Pontypridd Road is a residential road and currently has no cycling infrastructure. It would be safer for this road to be reduced to 20mph to protect all road users.

2.636 Comment 4:

2.637 Pontypridd Road is another active travel missing link in the VoG's transport network, it requires on road cycling without dedicated provision. Half its width is devoted to the storage of motor vehicles meaning cyclists need to give a car door's width gap to stay safe, i.e. cycle in the middle of the lane. This road is a clear yes to both of the Principal Questions, and more than one of the Place Criteria set out in the WG exceptions document.

2.638 Comment 5:

- 1) T 23 128 MS I undertook a petition of local residents in the St Nicholas' Road / Park Avenue / Harbour(Part) Road areas: Say NO to 30mph on St Nicholas & Park Avenue We call upon the Vale of Glamorgan Council to Council to apply 20mph default speed limit to Cardiff road dinas powys
- 2) & the adjoining Park Avenue, Harbour Road And Broad Street...for the sake of our children and the environment! Name Address Signature This petition was handed into the civic offices on 18th July 2023 in an envelope marked FAO Sandra Perkes.

2.639 The petition was conducted between 15 – 17th July 2023. Streets petitioned – St Nicholas's Rd; Park Avenue; Old Village Road; Canon Street; Clifton Street; The Grove; part of Harbour Road; Pyra Court /Yew tree Court /Rowan Court/Holly Court / Laurels flats off St Nicholas' Road. Additionally, parents at Romilly Primary School. Poor weather reduced petitioning activity over the weekend, I would have like to have covered more streets in the vicinity. Results 185 Signatures in favour of 20mph 17 against The support in favour of 20mph on St Nicholas's /Park Avenue /Harbour Road is overwhelming. Few needed persuading to sign the petition, the response was almost always an immediate 'yes'. Many expressed gratitude that someone was trying to do something about it. Concerns about the current 30mph was particularly high among people with children and the elderly. One elderly resident of Holly Court insisted on adding this to the sheet 'the situation on St Nicholas' Road has become intolerable - come and see for yourself!!' I would conjecture that similar results and responses would be obtained in other residential areas of the town where a 30mph is being proposed to be maintained. St Nicholas' Road is used by significant numbers of children and parents walking up to Romilly Primary

School. It, along with Park Avenue and Harbour Road, is also used by significant numbers of cyclists, particularly groups of leisure cyclists heading to and from Barry Island at the weekend. As a cyclist who uses this road several times a week I would point out that the Harbour Road approach to the causeway, on the eastern side of The Ship Inn, is dangerous for cyclists. To move onto the causeway cycle path requires a cyclist to move away from the Harbour Rd kerb into the middle of the lane in order to move onto the traffic island and then on to the cycle path itself. This manoeuvre is dangerous for cyclists as it is a steep hill where traffic behind you often picks up speed significantly beyond 30mph. If there is traffic immediately behind you then it is safer to carry on to the 40mph causeway road rather than take advantage of the available cycle path. To maintain this stretch at 30mph would make an absolute mockery of the Vale of Glamorgan's active travel ambitions. 2) T 23 127 MS Another hazardous area of road faced by cyclists in this area is the beginning of Pontypridd Road at the roundabout with Jenner Road and Park Crescent. In order to manoeuvre into the turn right box into Claude Road West, a cyclist has to drift across the lane. On several occasions cars have accelerated and dangerously overtaken me on my right hand side as I drifted right towards the box. This despite giving clear 'turning right' hand signals in good time. This downhill section of road at the very least must be made 20mph in order to ensure the safety of cyclists and pedestrians wishing to cross this road. I urge the Vale of Glamorgan council to recognise the depth of concerns in this area of Barry and rethink its current plans vis a vis these two sections of the proposal I have highlighted above.

2.640 Officer response 44

2.641 Following representations from objectors, and subsequent detailed review of the exceptions criteria, it has been agreed that St Nicholas' Road and Park Avenue, Barry meets the Place criteria and should default to 20mph due to the probability of significant pedestrian and cycle mixing and the proposed 30mph exception is not progressed. However, the 30mph exception will be retained on Broad Street (part), Harbour Road (part) and Pontypridd Road (part) as these areas do not meet the criteria in the Guidance as detailed below. The schedule within the proposed Order will be amended as outlined at Appendix 'D'.

2.642 Paragraph 1.1.2 of the Welsh Government document – Setting exceptions to the 20mph default speed limit for restricted roads states: *“this guidance is intended for local interpretation by highway authorities to make evidence-based decisions on setting exceptions to the default speed limit of 20mph on restricted roads in Wales, which will come into force on 17 September 2023.”*

2.643 The document is not mandatory and is guidance only. Whilst it was used to consider all proposed exceptions, local knowledge and interpretation was used in the decision making process.

- 2.644** Paragraph 2.1.1 states: *“a 20mph speed limit should be set where pedestrians and/or cyclists and motor vehicles mix in a frequent manner, except where strong evidence exists that higher speeds are safe”*.
- 2.645** Welsh Government has not provided a definition, or statistical interpretation of what is “frequent”. As an adjective, the word frequent can be described as “occurring or done many times at short intervals” When applying the guidance, it was not deemed reasonable that frequent mixing was occurring in the locations identified, nor was there strong evidence of any highway safety issues with vulnerable road users.
- 2.646** Furthermore, with the delay in providing Councils with the exception guidance, or suitable funding to undertake surveys to quantify the “frequency” of pedestrians and/or cyclists and motor vehicles mixing, officers used a combination of local knowledge, 3-year collision history involving vulnerable road users and recent surveys held.
- 2.647** Paragraph 2.1.3 outlines the two principal questions, A and B, that should be considered by highway authorities when deciding whether a 30mph exception should be made.
- 2.648** ***Question A: are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?***
- 2.649** There is no definition, or statistical value of what the Welsh Government deem as “significant”. Furthermore, there was no forecasting model, or increase factors in the guidance, to quantify what “potential” numbers of pedestrians and cyclists would use the road if the speeds were lower.
- 2.650** It is also noteworthy that paragraph 2.2.10 within the Place Criteria states: *“however, highway authorities continue to have the flexibility to set local speed limits that are right for individual roads, reflecting local needs and considerations”*.
- 2.651** Based on officer experience of the very poor uptake in numbers using the many shared-use active travel routes provided, officer assessments were empirical.
- 2.652** ***Question B: if the answer to A is ‘yes’, are the pedestrians and cyclists mixing with motor traffic?***
- 2.653** Where it was felt that the mixing of pedestrians and cyclists with motor traffic justifies the route becoming 20mph, that approval was subsequently made.
- 2.654** Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate any further amendments or finessing of speed limits where required. It will be the Councils intention to monitor the new speed limits, to

take onboard any comments or concerns and determine whether changes should be made.

2.655 Any future amendments to speed limits will be subject to the requirements of an amendment of the current Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.

2.656 Concern 45 – Broad Street/Ship Hill, Barry (T/23/128/MS)

2.657 Comment 1:

2.658 I note that St Nicholas Road is scheduled to be an Exception By Order Road, so will remain 30mph after September, but Park Crescent is scheduled to be 20mph. St Nicholas Road is a residential street which should come under the same category as Park Crescent. To issue an Exception By Order for St Nicholas Road so that it is excluded from the 20mph limit seems to be inequitable in the extreme. There are a number of parents and grandparents who regularly need to put children in car seats. With our two grandchildren we have no choice but to put them in car seats on opposite sides of the vehicle so that the rear door has to be open on the offside of the kerb. A 20mph limit would go a long way to reducing the risk of an accident. I would also submit that with vehicles parked on one side of the street for much of the length of St Nicholas Road it simply isn't wide enough for the limit to remain at 20mph. I would strongly urge the Council to reconsider the Exception By Order for St Nicholas Road.

2.659 Comment 2:

2.660 St Nicholas road should also be 20mph for the safety of our children.

2.661 Comment 3:

2.662 The 20MPH limit introduced by Welsh government, which the VoG are seeking an exemption for on road A4050 should not be granted. This is an incredibly busy road, often with narrow passings, bends, bends, traffic, parking, one-way systems and stop signs making it less than typical.

2.663 Comment 4:

2.664 30mph is too fast for st Nicholas road especially for large vehicles like buses. Cars speed along this this stretch. We live on Miskin street so need to cross this main road every time we use Romilly Park/church and the children cross it when walking to school to meet friends. If Park crescent is 20mph I don't see why the whole stretch isn't 20mph. St Nicholas road and the surrounding area is a densely populated residential area and young people need cross road at different places and this needs to be done safely. Park cr has 2 zebra crossings where as st Nicholas road has none.

2.665 Comment 5:

2.666 This is a very dangerous road and needs to be reduced to 20mph. The speed vehicles drive here from the island etc is super fast and very dangerous

2.667 Comment 6:

2.668 I fail to understand a reason for exception to 20 mile speed limit for Park Avenue. There have been a number of road traffic accidents with cars travelling in the wrong direction, particularly at the junction of Romilly Park Road and St Nicholas Rd. There is a blind corner which cars approach at speed indeed one car went through the railings, nearly heading for the railway line. My own car was written off by a car taking the corner at speed whilst it was parked on the right hand side of the road. Speed is already an issue with car users racing up and down to Barry Island. Although Park Ave is a wide road there are always cars from beyond the house holders parked including train passengers, visitors refusing to pay the increased parking charges, including coaches, patrons of St Nicholas Hall and West End social club. In short the road is heavily used for parking. The right of way is from St Nicholas Road with a very tight bend and in my opinion a 20 mile speed restriction would prevent the number of road traffic accidents occurring.

2.669 Comment 7:

2.670 Cars travel up and down St Nicholas Road at incredible speeds, it is extremely dangerous. It should be 20mph.

2.671 Comment 8:

2.672 This is a populated residential area with many roads opening onto St Nicholas Rd. Many are hidden or on: Canon Street, Miskin St, Old Village Rd, Rowan Court, two entries at 6 St Nicholas Rd/solicitors, The Grove. Cars, motorbikes and other vehicles regularly hurtle downhill on this stretch and, living on the corner of the crossroads at Canon Street and Old Village Rd, I often witness braking and swerving as they try to negotiate the narrowing road and the unexpected bends. Pedestrians from the station via Canon St have great difficulty crossing at the junction to Old Village Rd. Elderly residents from Rowan Court similarly take their lives in their hands crossing the road. It is clear that the existing natural traffic calming (bends, roadside parking) is not working at the current 30mph. There are currently no warning signs for crossroads, hidden entrances. There is no designated pedestrian crossing on the upper stretch of St Nicholas Rd. It is currently a dangerous section of road as it is seen as a racetrack for some vehicles. Inclusion in the 20mph zone would go some way to improving this area for residents and road users alike.

2.673 Comment 9:

- 2.674** Please change the speed limit on St Nicholas road Barry to 20mph. I live in Canon Street and everyday have to brave turning right into St Nicholas rd. it's incredibly dangerous and slowing signs are also needed.
- 2.675 Comment 10:**
- 2.676** We regularly visit family in Barry and cross this road to access Romilly Park. Cars drive far too fast along this stretch of road.
- 2.677 Comment 11:**
- 2.678** I think it should be 20mph.
- 2.679 Comment 12:**
- 2.680** I am specifically rejecting plans to keep St Nicholas road, Broad Street, Pontypridd road and fford y milleniwm at 30mph. St. Nicholas rd and pontypridd road are both residential streets that are also main routes to some of the biggest schools in the vale. Reducih to 20mph ensures that children have safe routes to travel actively to school. St Nicholas road has narrow paths, which make it particularly scary to walk down with children to school/ Romilly park/the various halls that host scouting and children's clubs in the area, when traffic volumes and speeds are high(30mph + currently). Reducing the speed limit here will create safe routes for our children to use without fear of injury or worse. Broad Street has significant issues with boy racer types speeding along it. Reducing the speed limit along its length will restrict this anti-social behaviour. I often see pedestrians and vulnerable route users struggle to cross at the junction to Morrisons. This is due to high traffic volumes and speed.Reducing to 20mph will make it much safer for route users to cross. In general terms, reducing to 20mph will make it much safer for route users to cross. In general terms, reducing to 20mph will make a huge difference to people who already travel actively in the area, particularly vulnerable users, and will go a very long way to encouraging modal shift. I think making exceptions to these routes would have a detrimental effect on active route users and residents in these areas.
- 2.681 Comment 13:**
- 2.682** Ship Hill and surrounding road layouts cause confusion with many drivers choosing incorrect lanes or ignoring road markings (on all 3 sides of the triangle road layout) and pedestrian crossings across 2 lanes at the east part. 20mph would give more thinking time. Where there are no pedestrian crossings (west part) it is exceptionally difficult for pedestrians to cross, so 20mph would be safer for all.
- 2.683 Comment 14:**

2.684 RE: A4055, Harbour Road (part), Barry From its junction with the A4055, Park Avenue, southwards and contiguous with the existing 40mph speed restriction, a distance of approximately 235 metres. This is a mistake. There is no good reason to continue the 40mph speed limit in this urban area – particularly as a multitude of shared spaces converge in this area – from cyclists to pedestrians, to park users, to pub-goers and restaurant visitors. Let's slow traffic down, not permit it to be used as a speedway.

2.685 Comment 15:

2.686 The plans show maintenance of 30mph speed limits on a number of stretches of road which are designated because of the high volumes of traffic. Welsh Government guidance <https://www.gov.wales/setting-exceptions-20mph-default-speed-limit-restricted-roads-html> (Section 2.1) notes that exceptions may be made and 30mph maintained if certain criteria are met. I do not believe that the criteria are met for the stretches of St Nicholas Road, Broad Street and the connected streets shown in the plans. Section 2.1.3 describes specific questions to be considered in providing an exception: (A) Are there significant numbers (or potential numbers, If speeds were lower) of pedestrians and cyclists travelling along or across the road? (B) If the answer to A is 'yes', the pedestrians and cyclists mixing with motor traffic? Section 2.2.8 of the Guidance provides non-exclusive criteria are for answering questions A and B: Are the sections of road: • Within a 100m walk of any educational setting (e.g. primary, secondary, further education and higher education) • Within 100m walk of any community centre • Within 100m walk of any hospital • Where the number of residential and/or retail premises fronting a road exceeds 20 properties per km. Given these guidelines, the exceptions should not be made for these stretches of road because: • St Nicholas Road: o St Nicholas' Community Centre is on St Nicholas Road. In line with guidance, no areas within 100m walk should be granted this exception. o Most of the stretch of St Nicholas' Road from the Park Avenue to the roundabout Junction of Porthkerry Road is residential, with housing on both sides of the road. o There are also community assets on both sides of the road, including The West End Club as well as the Community Centre. o This section includes routes to Romilly Park that are used by a very large proportion of the population to the East of the road, including families with small children and unaccompanied children of older primary and younger secondary age. The road and pavements is narrow, without marked pedestrian crossings and with poor sight lines. o St Nicholas Road is a pedestrian route to Romilly School, and to Ysgol Gymraeg Bro Morgannwg and Whitmore o This stretch of road meets all of the criteria to not be granted an exception. The Council should follow the guidance and not make exceptions for this area • The Broad Street stretch of road: o This stretch o road includes the crossing to Barry Station. Barry Station recorded 349, 146 entries and exits in 2021-22 according to the UK's Office of Rail and Road <https://dataportal.orr.gov.uk/statistics/usage/estimates-of-station-usage/>.

2.687 The majority of these will be via this crossing, which is also much used by families with young children and unaccompanied children of older primary and younger secondary age. o The road leads to a retail and leisure section Broad Street with extremely high footfall and mixing of traffic and pedestrians, often young people who have been drinking alcohol and are crossing the road between the bars and clubs. It would clearly be safer to impose a 20mph limit earlier on the stretch of road, rather than requiring drivers to rapidly decelerate just as they reach a busy area. The guidance also notes o The guidance requires local authorities to consider potential users, not just current ones This the main road linking large sections of western Barry to the centre. There is currently some cycling along these routes; a 20mph limit would encourage this, and so support the Vale of Glamorgan’s active travel and climate change strategies • There are acknowledged issues with traffic on these stretches of road including unlicensed vehicles (dirt bikes and quad bikes) and speeding. The area often appears to form a circuit for high speed driving, in particular at night in the summer. Exempting these stretches of road from the legislation is likely to encourage this already unlawful behaviour and make traffic calming measures that could address it impossible • It is not clear what the rationale for imposing these exceptions is. The routes lead to Barry Island, which can lead to high traffic volumes on specific days, but these are limited and it is not clear that exempting small stretches of road will ease this in any way. It is notable that the causeway to Barry Island is not exempted, despite the fact that there are no residences and wide pavements on only one side, limiting traffic and pedestrian mixing. I am glad this exception has not been made for this stretch, but it is clearly inconsistent. • It is not clear what the benefits to drivers are, in comparison to the costs to pedestrians and residents. Exempting small stretches of road will not appreciably reduce the journey times for drivers, but will create increased risks for pedestrians and other road users (as drivers may begin to accelerate into these areas and not realise they have ended suddenly) as well as costs to council tax payers (as signage will have to be put in place and maintained for these stretches) In summary, these exceptions are not in line with Welsh Government guidance, will create risks to pedestrians and other non-car road users without bringing any benefit to drivers who are staying within the law. these exceptions should not be made: these areas should be 20mph as the surrounding areas are.

2.688 Comment 16:

2.689 The area going up and down the hill to Harbour Road is well used by pedestrians. The junction at St Nicholas Road and Park Avenue is extremely dangerous to cross. Cars come down the hill at speed and poor visibility means it is hard to see what is coming around the corner. This junction really needs to be improved, which includes changing it to a 20mph road.

2.690 Comment 17:

2.691 There is no requirement for this road to be an exception to the 20 mph limit. I drive up this road every day and very rarely go above 20mph because of the traffic and roundabout. Also considering bus stops, side roads and parked vehicles, 20mph is sufficient.

2.692 Comment 18:

2.693 As previously stated during an early consultation, the 20mph zone should continue from Park Crescent down St Nicholas Road for safety concerns. Further the Park Avenue, Broad St and Harbour Road areas should be reduced, especially given the number of pedestrian crossings (4) covered by the proposed exemption.

2.694 Comment 19:

2.695 The answer to the principal questions in the guidance documents is yes for both A and B, on road cycle route and potential for a lot more cyclists if the speeds were lower. The distance of approximately 205 metres is also shorter than the 300 metres WG minimum guidance. Chopping and changing speed limits for short sections of roads is confusing for all users.

2.696 Comment 20:

2.697 This route has a number of blind junctions and sharp bends with an incline and is safer with a 20mph speed limit.

2.698 Comment 21:

2.699 The answer to the principal questions in the WG guidance documents is yes for both A and B for this section of road, on road cycle route without dedicated provision and the potential for a lot more cyclists if the speeds were lower. The distance of approximately 205 metres is also shorter than the 300 metres WG minimum guidance. If there are or could be cyclists, the road should be 20 - regardless of its width, the traffic speed etc.

2.700 Officer response 45

2.701 Following representations from objectors, and subsequent detailed review of the exceptions criteria, it has been agreed that St Nicholas' Road and Park Avenue, Barry meets the Place criteria and should default to 20mph due to the probability of significant pedestrian and cycle mixing and the proposed 30mph exception not be progressed. However, the 30mph exception will be retained on Broad Street (part), Harbour Road (part), Pontypridd Road (part) and Ffordd y Milenium (part) as these areas do not meet the criteria in the Guidance as detailed below. The schedule within the proposed Order will be amended as outlined at Appendix 'D'.

- 2.702** Paragraph 1.1.2 of Welsh Government document – Setting exceptions to the 20mph default speed limit for restricted roads states: *“this guidance is intended for local interpretation by highway authorities to make evidence-based decisions on setting exceptions to the default speed limit of 20mph on restricted roads in Wales, which will come into force on 17 September 2023.”*
- 2.703** The document is not mandatory and is guidance only. Whilst it was used to consider all proposed exceptions, local knowledge and interpretation was used in the decision making process.
- 2.704** Paragraph 2.1.1 states: *“a 20mph speed limit should be set where pedestrians and/or cyclists and motor vehicles mix in a frequent manner, except where strong evidence exists that higher speeds are safe”.*
- 2.705** Welsh Government has not provided a definition, or statistical interpretation of what is “frequent”. As an adjective, the word frequent can be described as “occurring or done many times at short intervals” When applying the guidance, it was not deemed reasonable that frequent mixing was occurring in the locations identified, nor was there strong evidence of any highway safety issues with vulnerable road users.
- 2.706** Furthermore, with the delay in providing Councils with the exception guidance, or suitable funding to undertake surveys to quantify the “frequency” of pedestrians and/or cyclists and motor vehicles mixing, officers used a combination of local knowledge, 3-year collision history involving vulnerable road users and recent surveys held.
- 2.707** Paragraph 2.1.3 outlines the two principal questions, A and B, that should be considered by highway authorities when deciding whether a 30mph exception should be made.
- 2.708** ***Question A: are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?***
- 2.709** There is no definition, or statistical value of what the Welsh Government deem as “significant”. Furthermore, there was no forecasting model, or increase factors in the guidance, to quantify what “potential” numbers of pedestrians and cyclists would use the road if the speeds were lower.
- 2.710** It is also noteworthy that paragraph 2.2.10 within the Place Criteria states: *“however, highway authorities continue to have the flexibility to set local speed limits that are right for individual roads, reflecting local needs and considerations”.*
- 2.711** Based on officer experience of the very poor uptake in numbers using the many shared-use active travel routes provided, officer assessments were empirical.

2.712 Question B: if the answer to A is 'yes', are the pedestrians and cyclists mixing with motor traffic?

2.713 Where it was felt that the mixing of pedestrians and cyclists with motor traffic justifies the route becoming 20mph, that approval was subsequently made.

2.714 Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate any further amendments or finessing of speed limits where required. It will be the Councils intention to monitor the new speed limits, to take onboard any comments or concerns and determine whether changes should be made.

2.715 Any future amendments to speed limits will be subject to the requirements of an amendment of the current Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.

2.716 Concern 46 – Ffordd y Mileniwm, Barry (T/23/129/MS)

2.717 Comment 1:

2.718 I am specifically rejecting plans to keep St Nicholas road, Broad Street, Pontypridd road and ffordd y mileniwm at 30mph. St. Nicholas rd and pontypridd road are both residential streets that are also main routes to some of the biggest schools in the vale. Reducing to 20mph ensures that children have safe routes to travel actively to school. St Nicholas road has narrow paths, which make it particularly scary to walk down with children to school/ Romilly park/the various halls that host scouting and children's clubs in the area, when traffic volumes and speeds are high (30mph + currently). Reducing the speed limit here will create safe routes for our children to use without fear of injury or worse. Broad Street has significant issues with boy racer types speeding along it. Reducing the speed limit along its length will restrict this anti-social behaviour. I often see pedestrians and vulnerable route users struggle to cross at the junction to Morrisons. This is due to high traffic volumes and speed. Reducing to 20mph will make it much safer for route users to cross. In general terms, reducing to 20mph will make it much safer for route users to cross. In general terms, reducing to 20mph will make a huge difference to people who already travel actively in the area, particularly vulnerable users, and will go a very long way to encouraging modal shift. I think making exceptions to these routes would have a detrimental effect on active route users and residents in these areas.

2.719 Comment 2:

2.720 I am objecting to Ffordd y Mileniwm staying as a 30mph road. I can provide evidence through videos of the constant speeding on this road and near miss accidents on this road and vehicles going through red lights. As well as living on this Road , my daughter also attends st Baruc school, which has been built the same side of our house and I worry about cars that speed so close to the school,

not just with the safety issues but the environmental factors as well.. Due to the open front of our property and our house being so close to this busy road, I often feel unsafe leaving my house and walking my 5 year old daughter to school. We have recently started to film the road and we are making numerous complaints to the police, so I can evidence the problems we are having. There are also numerous social media posts from other residents that are highlighting this problem. This is a dangerous road cars and bikes are already speeding, so perhaps if the speed limit is lowered this will give the police more power to act before there is a serious accident. I believe that speed bumps and road markings would be extremely beneficial on this road as well.

2.721 Comment 3:

2.722 There is no segregation for cyclists or pedestrians at roundabouts on both ends of this section of road, meaning it does not meet WG guidance for an exception. It is also shorter than the 300 metre WG minimum guidance.

2.723 Comment 4:

2.724 High volume of pedestrian and cycle traffic along this road with no defined crossing points, including to bus-stops. As a cyclist, I (and others) find the supposed cycle path along this stretch is not fit for purpose (doesn't meet active travel guidance, so cyclists are predominantly on the road with cars along this stretch.

2.725 Comment 5:

2.726 Cory Way (part), Barry; Clos Tyniad Glo (part), Barry; Y Rhodfa (part), Barry; Heol Ceiniog (part), Barry Probably T/23/129/MS but access to the map with numbers closed before end of consultation. The junction with Ffordd y Mileniwm for all these roads have high pedestrian and cyclist crossing, without provision/priority for active travel, therefore don't meet the WG guidance criteria/ yes to principal question A. The distance of approximately 40 metres is much shorter than the 300 metres WG minimum guidance.

2.727 Officer response 46

2.728 Following representations from objectors, and subsequent detailed review of the exceptions criteria, it has been agreed that St Nicholas' Road and Park Avenue, Barry meets the Place criteria and should default to 20mph due to the probability of significant pedestrian and cycle mixing and the proposed 30mph exception is not progressed. However, the 30mph exception will be retained at Ffordd y Milenium (part) as this location did not meet the criteria in the Guidance as detailed below. The schedule within the proposed Order will be amended as outlined at Appendix 'D'.

- 2.729** It was determined that part of Ffordd y Mileniwm did not meet the Welsh Government’s place criteria guidance, detailed below, therefore as shown on plan T/23/129/MS, part will default to 20mph, and part will be a 30mph exception.
- 2.730** Place criteria:
1. Within a 100m walk of any educational setting (e.g. primary, secondary, further education and higher education).
 2. Within 100m walk of any community centre.
 3. Within 100m walk of any hospital.
 4. Where the number of residential and/or retail premises fronting a road exceeds 20 properties per km.
- 2.731** Consideration was given to existing cyclist and pedestrian flows along or across Ffordd y Mileniwm and from experience, local knowledge, history of road traffic collisions, composition of traffic, a determination was made to retain those speeds at 30mph.
- 2.732** It is impossible to hypothesis the potential number of cyclist or pedestrian that will use a route based on perceived road safety. Perception differs from person to person and unfortunately the Welsh Government guidance did not provide any forecasting model, or formula to determine future usage.
- 2.733** The officers reviewing the proposed exception sites fully understood the Welsh Government guidance and applied the two-stage test accordingly. Bearing in mind that Welsh Government gave no additional funding for pedestrian and traffic surveys on our strategic routes, nor did the Welsh Government provide growth factors for future cyclist and pedestrian usage based on speeds dropping to 20mph.
- 2.734** With regard your concerns raised over traffic speed, other traffic offences or anti-social behaviours, these are not material considerations in the Guidance provided by Welsh Government for “Setting exceptions to the 20mph default speed limit for restricted roads”. The primary responsibility for speed enforcement, poor driving standards or anti-social behaviours rests solely with the Police and for this reason residents should raise specific concerns regarding such matters direct to South Wales Police for their consideration and investigation.
- 2.735** Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate any further amendments or finessing of speed limits where required. It will be the Councils intention to monitor the new speed limits, to take onboard any comments or concerns and determine whether changes should be made.
- 2.736** **Concern 47 – Gladstone Road, Barry (T/23/130/MS)**

2.737 Comment 1:

2.738 The section from court road to Tynewyth road should be 20mph from the roundabout and west of, due to being by a nursery/daycare centre and busy sports ground. People park with little regard for others and 20mph would be more appropriate.

2.739 Comment 2:

2.740 Some of the exempt roads would not require an exemption (i.e Pontypridd Road, Gladstone Road) yet other roads like Trinity Street and Tynewydd Road would be impossible to drive at 20mph due to the steep incline; these should be exempt. This will just cause excessive emissions with people either stalling constantly or speeding in order to actually get up the hill. The whole 20mph roads is ridiculous anyway.

2.741 Comment 3:

2.742 The full length of the A4055, Gladstone Road Barry should be 20mph. The section that is exempt includes the Barry pedestrian entrance for the football club do there is a lot of pedestrian footfalls during events. There is a flying start pre-school nursery also on that section of road.

2.743 Comment 4:

2.744 A4055 Gladstone Road, Barry - Map 67 - from the junction with Tynewydd Road to the roundabout on Cardiff Road, Barry.

2.745 Why will this stretch of road be classed as 30mph, an exception, following the introduction of the 20mph default speed limit for restricted roads from September 2023? This stretch of road has a Sports Ground, Adult Social Services Centre, a Flying Start Family Centre, a Police Station, the YMCA within a stretch of road of approximately 300 metres. There are also 3 Schools within the vicinity, more than 100metres away (from the South to North, Holton Road Primary School, St. Helens RC Primary School and Jenner Park Primary School) and children in the area attend a mix of these Schools with a number crossing Gladstone Road to do so. Perhaps it would be better for the 30mph exemption on Gladstone Road to end at where the houses (502 South side and 327 North side) start towards the eastern end of Gladstone Road with some road narrowing/additional crossing refuge installed at this point to assist Adults and Children to cross this busy road at this point.

2.746 Comment 5:

2.747 All the side roads from Gladstone Road - Vere Street (part), Barry; Court Road (part), Barry; B4294, Court Road (part), Barry; Morel Street (part), Barry.

Sections of road are 30-40 metres, shorter than the 300 metres WG minimum guidance. Cyclists on the roads and crossings at junction with Gladstone Rd don't have pedestrian and cyclist priorities and therefore do not meet the WG guidance for exceptions.

2.748 Comment 6:

2.749 Gladstone Road is a key missing active travel link in the VoG's transport network. Half the road width is devoted to the storage of motor vehicles and there is no dedicated provision for cyclists. The answer to the principal questions in the WG guidance documents is yes for both A and B for this section of road, an on road cycle route - with the potential for a lot more cyclists if the speeds were lower and the road surface improved. The parked cars and the very poor road surface mean that cyclists have to use the middle of the lane (I commute on this road and it is dangerous despite its apparent width). This road also has a clear yes to more than one of the Place Criteria set out in the Welsh Government exceptions document.

2.750 (This comment from the respondent was registered against an incorrect plan reference relating to Cardiff Road, therefore it has been added to the comments for Gladstone Road for which it relates)

2.751 Officer response 47

2.752 It was determined that part of Gladstone Road did not meet the Welsh Government's place criteria guidance, detailed below, therefore as shown on plan T/23/130/MS, part will default to 20mph, and part will be a 30mph exception.

2.753 Place criteria:

1. Within a 100m walk of any educational setting (e.g. primary, secondary, further education and higher education).
2. Within 100m walk of any community centre.
3. Within 100m walk of any hospital.
4. Where the number of residential and/or retail premises fronting a road exceeds 20 properties per km.

2.754 It is understood that the main aim of the Flying Start Family Centre is to improve a child's development, health and wellbeing in preparation for school and is provided for families with children under 4 years of age. It is not considered an educational establishment and not referred specifically within the Place criteria in the same way that many private nurseries are not referred or identified in the Place criteria. The Flying Start Family Centre is also considered to be served by good, protected facilities for pedestrians meeting ATAG.

2.755 Football stadia are also not specifically referenced in the Place criteria, however, it could be accepted that it could be considered to fall under the umbrella of a

community facility where members of a community tend to gather for group activities in this case generally related to sporting events and training associated with those sports.

- 2.756** The guidance for setting exceptions is intended for local interpretation by Local Authorities and also requires or allows Local Authorities to consider local factors and presence of protected facilities for pedestrians and cyclists when setting exceptions. Therefore, whilst the Place criteria is an important consideration, it is not necessarily the only singular defining factor within the guidance.
- 2.757** Consideration was given to existing cyclist and pedestrian flows along or Gladstone Road and from experience, local knowledge, history of road traffic collisions, composition of traffic, a determination was made to retain those speeds at 30mph.
- 2.758** It is impossible to hypothesis the potential number of cyclist or pedestrian that will use a route based on perceived road safety. Perception differs from person to person and unfortunately the Welsh Government guidance did not provide any forecasting model, or formula to determine future usage.
- 2.759** The officers reviewing the proposed exception sites fully understood the Welsh Government guidance and applied the two-stage test accordingly. Bearing in mind that the Welsh Government gave no additional funding for pedestrian and traffic surveys on our strategic routes, nor did the Welsh Government provide growth factors for future cyclist and pedestrian usage based on speeds dropping to 20mph.
- 2.760** Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate any further amendments or finessing of speed limits where required. It will be the Councils intention to monitor the new speed limits, to take onboard any comments or concerns and determine whether changes should be made.
- 2.761** **Concern 48 – Cardiff Road, Barry (T/23/132/MS)**
- 2.762** **Comment 1:**
- 2.763** Cardiff Rd Cadoxton Laura St to Gladstone Rd/Vere St roundabout.
- 2.764** The answer to the principal questions in the WG guidance documents is yes for both A and B for this section of road, on road cycle route without dedicated provision and the potential for a lot more cyclists if the speeds were lower. It is another key missing link in the VoG active travel network as a main corridor between VoG and Cardiff. I commute (by bike) on this road and it's narrow and dangerous, with daily close passes at speed. It in no way meets the WG guidance for an exception.

2.765 Officer response 48

2.766 It was determined that Cardiff Road, Barry did not meet the Welsh Government's place criteria guidance, as detailed below:

2.767 Place criteria:

1. Within a 100m walk of any educational setting (e.g. primary, secondary, further education and higher education).
2. Within 100m walk of any community centre.
3. Within 100m walk of any hospital.
4. Where the number of residential and/or retail premises fronting a road exceeds 20 properties per km.

2.768 The guidance for setting exceptions is intended for local interpretation by Local Authorities and also requires or allows Local Authorities to consider local factors and presence of protected facilities for pedestrians and cyclists when setting exceptions. Therefore, whilst the Place criteria is an important consideration, it is not necessarily the only singular defining factor within the guidance.

2.769 Consideration was given to existing cyclist and pedestrian flows along or across Cardiff Road, Barry and from experience, local knowledge, history of road traffic collisions, composition of traffic, a determination was made to retain those speeds at 30mph.

2.770 It is impossible to hypothesise the potential number of cyclist or pedestrian that will use a route based on perceived road safety. Perception differs from person to person and unfortunately the Welsh Government guidance did not provide any forecasting model, or formula to determine future usage.

2.771 The officers reviewing the proposed exception sites fully understood the Welsh Government guidance and applied the two-stage test accordingly. Bearing in mind that the Welsh Government gave no additional funding for pedestrian and traffic surveys on our strategic routes, nor did the Welsh Government provide growth factors for future cyclist and pedestrian usage based on speeds dropping to 20mph.

2.772 The small numbers of proposed exception sites, which includes Cardiff Road, Barry, are to ensure the safe and expeditious travel of motor traffic on routes that are appropriate for being retained as 30mph.

2.773 Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate any further amendments or finessing of speed limits where required. It will be the Councils intention to monitor the new speed limits, to take onboard any comments or concerns and determine whether changes should be made.

2.774 Any future amendments to speed limits will be subject to the requirements of an amendment of the current Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.

2.775 Concern 49 – Penarth (T/23/133/MS)

2.776 Comment 1:

2.777 It makes no sense to put a 30mph exception from Cosmeston along Lavernock Rd up to the entrance to Castle Avenue. It should be 20mph just after the EGO restaurant. I would love someone to explain the logic of planting hundreds of metal sign posts into an already cluttered urban environment. Surely VOGC could have just put a 20mph sign on the entrance to Penarth from Cardiff, one at the entrance to Lavernock Rd from Sully, and one from Dinas onto Redlands Rd. Now everywhere I go I see all these extra posts. You're consulting now when you've clearly already made your decision. That's why you've installed extra posts on the entrance to Chantry Rise where you can't possibly drive at 30mph anyway. To allow for your exemption on that tiny stretch of road. I am just appalled at the amount of money being wasted on this. You could have just zoned all of Penarth as 20 and saved what must be hundreds of thousands on signposts and additional repeater signs everywhere.

2.778 Comment 2:

2.779 Lower Windsor Road is a hazardous commuter route lined with parked vehicles with extreme air pollution. When not totally congested residents and pedestrians are subject to dangerous speeding vehicles. This road should not be exempted and certainly should be subject to 20mph. Schemes should be devised to enhance safety, public transport and active travel.

2.780 Comment 3:

2.781 Although I am a car owner living in Penarth, I see no reason to exempt Lavernock Road from the 20 mph speed limit. It is a heavily residential road and this who live on it deserve - as do residents on other streets in Penarth the benefits that follow from a 20 mph limit: less pollution and noise and improved safety.

2.782 Comment 4:

2.783 B4267 Lavernock Road (part) Penarth - an exemption is proposed south of the junction with castle avenue and Augusta road for 1376 (to beyond the entrance to Cosmeston Park). I do not think this section of road should be exempted from the 20 mph limit. VOG have not put forward a reasoned case why this road should be exempted and remain at 30 mph. It's a residential area.

2.784 Comment 5:

2.785 The exception should end at the Penarth boundary as the segregated shared cycle path (VALE-SPR-0021) ends at this point forcing cyclists to use the road. I don't believe the council has considered the number of people crossing the road to the Bus stop (Golf Club) which has no footpath with the entrance into the bus shelter directly onto the road! While this wouldn't be allowed now it exists and as such should receive the same 20mph protection offered through this legislation for walkers having to cross the road to the bus stop. There are also more than 20 forward-facing properties per 1km towards the end of the exception which appears to have been ignored. All of this means it fails many of the Welsh Government A and B questions and "Protected facilities for pedestrians and cyclists" appear to show that this part of the road should be 20mph.

2.786 Comment 6:

2.787 I would like to see the proposed 30mph route extend along all of Lavernock and Redlands Rd as it is a main route through Penarth, to allow the flow of traffic through.

2.788 Comment 7:

2.789 Can you clarify why the the B4267 from the Westbourne Road junction up to Castle Avenue is an exception to the 20mph limit? The road does not change in nature before or after the junction with Castle Avenue. The road is in a residential area with significant pedestrian numbers using the adjacent pavements, in particular as a primary walking route to primary and secondary schools, including pedestrians from the houses in the Cosmeston drive area. The road is used by cyclists, and by children cycling to primary and secondary school. The existing cycle path adjacent to the B4267 ends approx 100m before the Brockhill Rise junction, therefore the majority of cyclists going to the schools and residential areas adjacent to Lavernock and Redlands road will join the road. Cyclists cycling on the B4267 cycling towards Sully will also have to pass the junction for Westbourne road with a speed limit of 30mph, this awkward junction, with many cars cutting the corner at speed, it would be safer for cyclists if the road was 20mph. Both pedestrian and cyclist numbers will increase when the proposed housing development in lower Cosmeston is developed. The 30mph signage will create an acceleration zone in a residential area and affect the cyclists and pedestrians using the same road. There has been a fatal road traffic accident on this stretch of road in 2014. I would consider a different location for the 30mph exception to be applied at an appropriate sighting distance after the Westbourne Road junction on the way towards Sully, possibly where the Brockhill rise junction is or where the Cycle Path ends opposite the service station. Thank you for your consideration.

2.790 Officer response 49

- 2.791** Following representations from objectors and a subsequent detailed review by officers, it is considered that due to attendance at the popular Penarth leisure centre serving the wider community and the presence of existing cycle facilities along the upper part of the road encouraging cycling to use this route, it is likely and probable that Windsor Road in Penarth, which meets the Place criteria, will have significant pedestrian and cycle mixing with vehicular traffic flows. It has therefore been agreed that the proposed 30mph exception should not be progressed along Windsor Road between its junction with Plassey Street and Marconi Avenue. The schedule within the proposed Order will be amended as outlined at Appendix 'D'.
- 2.792** It was determined that part of Lavernock Road, Penarth did not meet the Welsh Government's place criteria guidance, detailed below, therefore as shown on plan T/23/133/MS, part will default to 20mph and part will be a 30mph exception.
- 2.793** Place criteria:
1. Within a 100m walk of any educational setting (e.g. primary, secondary, further education and higher education).
 2. Within 100m walk of any community centre.
 3. Within 100m walk of any hospital.
 4. Where the number of residential and/or retail premises fronting a road exceeds 20 properties per km
- 2.794** The guidance for setting exceptions is intended for local interpretation by Local Authorities and also requires or allows Local Authorities to consider local factors and presence of protected facilities for pedestrians and cyclists when setting exceptions. Therefore, whilst the Place criteria is an important consideration, it is not necessarily the only singular defining factor within the guidance.
- 2.795** Consideration was given to existing cyclist and pedestrian flows along or across Lavernock Road and from experience, local knowledge, history of road traffic collisions, composition of traffic, a determination was made to retain the speed at 30mph.
- 2.796** It is impossible to hypothesise the potential number of cyclist or pedestrian that will use a route based on perceived road safety. Perception differs from person to person and unfortunately the Welsh Government guidance did not provide any forecasting model, or formula to determine future usage.
- 2.797** The officers reviewing the proposed exception sites fully understood the Welsh Government guidance and applied the two-stage test accordingly. Bearing in mind that the Welsh Government gave no additional funding for pedestrian and traffic surveys on our strategic routes, nor did the Welsh Government provide

growth factors for future cyclist and pedestrian usage based on speeds dropping to 20mph.

- 2.798** The small numbers of proposed exception sites, which includes Lavernock Road are to ensure the safe and expeditious travel of motor traffic on routes that are appropriate for being retained as 30mph.
- 2.799** South Wales Police and GoSafe fully support the legislation change on 17th September 2023, and have ensured the delivery of a consistent, fair and proportionate approach to enforcement of the new speed limit.
- 2.800** Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate any further amendments or finessing of speed limits where required. It will be the Councils intention to monitor the new speed limits, to take onboard any comments or concerns and determine whether changes should be made.
- 2.801** Any future amendments to speed limits will be subject to the requirements of an amendment of the current Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.
- 2.802 Concern 50 – Penarth (T/23/109/WS)**
- 2.803 Comment 1**
- 2.804** Many cyclists use Windsor Road as the most direct way to reach west Cardiff from Penarth. The road is fairly narrow, with many cars parked on the side of the road in Cogan. It is therefore challenging for vehicles to give cyclists the 2m of space required by the Highway Code – and when travelling up to 30mph, the risk to cyclists is so much worse than it would be at 20mph. There are allotments on one side of the road, and a few houses, and no safe place to cross Windsor Road without walking along the road within the traffic flow. Extremely dangerous. So this road should certainly not be exempt from the 20mph speed limit.
- 2.805 Officer response 50**
- 2.806** Following representations from objectors and a subsequent detailed review by officers, it is considered that due to attendance at the popular Penarth leisure centre serving the wider community and the presence of existing cycle facilities along the upper part of the road encouraging cycling to use this route, it is likely and probable that Windsor Road in Penarth, which meets the Place criteria, will have significant pedestrian and cycle mixing with vehicular traffic flows. It has therefore been agreed that the proposed 30mph exception should not be progressed along Windsor Road between its junction with Plassey Street and Marconi Avenue. The schedule within the proposed Order will be amended as outlined at Appendix ‘D’.

2.807 Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate amendments or finessing of speed limits where required. It will therefore be the Councils intention to monitor the new speed limits on all exception roads, to take onboard any future comments or concerns and determine whether changes should be made based on a revision of the existing Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.”

2.808 Concern 51 – Penarth (T/23/110/WS & T/23/111/WS)

2.809 Comment 1:

2.810 The road through Dinas Powys is used by a large number of cyclists and pedestrians. Those are all very close to, or among, motor vehicles. No section of Cardiff Road through the village should be exempt from the orders, except for the section of the road leading from the village to the Merrie Harrier where the bus lane is operational. There are shops, a school, all kinds of leisure facilities, two train stations, where people cross the road very often, using the specified crossings or not. Please note that this map has not been updated to include the Clos Derwen housing development.

2.811 Comment 2:

2.812 A great many cyclists use this road as the shortest way from Cardiff to Barry. They are therefore in the traffic flow constantly throughout the whole of Dinas Powys. There are facilities and houses on either side of the road, and people get to them by walking across the road, at formal crossings or not. The only part of the road in question that can be exempt from the 20mph speed limit is that section between the Merrie Harrier and the start of the village, that is, the part that corresponds to the bus lane. But even though the road is wider here, it's still dangerous enough for cyclists.

2.813 Officer response 51

2.814 Following representations from objectors, and subsequent detailed review of the exceptions criteria, it has been agreed that an additional length of Cardiff Road, Dinas Powys meeting the Place criteria should default to 20mph due to the probability of significant pedestrian and cycle mixing and the proposed 30mph exception be amended accordingly. The schedule within the proposed Order will be amended as outlined at Appendix 'D'.

2.815 Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate amendments or finessing of speed limits where required. It will therefore be the Councils intention to monitor the new speed limits on all exception roads, to take onboard any future comments or concerns and determine whether changes should be made based on a revision of the existing Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.”

2.816 Clos Derwen housing development will become 20mph by default and this is shown on Data Map Wales.

2.817 Concern 52 – Penarth (T/23/133/WS)

2.818 Comment 1:

2.819 A significant number of cyclists travel along this road along the zone intended to be exempt from the order. These cyclists cycle on the road itself, rather than on the pavement (which, in any case, is narrow in places and edges the road, and with barriers to direct travel, including roads coming across), or on the cycle path along the old railway (although of course that route is used). If I travel to Sully or Barry by bike, I'll come down Westbourne Road and join the traffic along Larnog Road, and I see a significant number of cyclists doing the same. The county council would have to show the evidence otherwise - that is, that there are no cyclists using this section of Larnog Road.

2.820 Officer response 52

2.821 It was determined that part of Lavernock Road, Penarth and part of Windsor Road, Penarth did not meet the Welsh Government's place criteria guidance, detailed below, therefore as shown on plan T/23/133/MS, part will default to 20mph and part will be a 30mph exception.

2.822 Place criteria:

1. Within a 100m walk of any educational setting (e.g. primary, secondary, further education and higher education).
2. Within 100m walk of any community centre.
3. Within 100m walk of any hospital.
4. Where the number of residential and/or retail premises fronting a road exceeds 20 properties per km.

2.823 The guidance for setting exceptions is intended for local interpretation by Local Authorities and also requires or allows Local Authorities to consider local factors and presence of protected facilities for pedestrians and cyclists when setting exceptions. Therefore, whilst the Place criteria is an important consideration, it is not necessarily the only singular defining factor within the guidance.

2.824 Consideration was given to existing cyclist and pedestrian flows along or across Lavernock Road and from experience, local knowledge, history of road traffic collisions, composition of traffic, a determination was made to retain those speeds at 30mph.

2.825 Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate any further amendments or finessing of speed limits where required. It will be the Councils intention to monitor the new speed limits, to

take onboard any comments or concerns and determine whether changes should be made.

2.826 Any future amendments to speed limits will be subject to the requirements of an amendment of the current Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.

2.827 Concern 53 – General comments submitted in relation to the introduction of the 20mph default.

2.828 Comment 1:

2.829 Skomer Road is painfully slow at 20mph. It is wide and barely has any pedestrian activity yet it is 20mph. Skomer Road should remain at 30mph. This road also has a Gosafe camera at the bottom of the hill it is sadly going to catch many people who are going a perfectly safe limit for that road. These are innocent people now who have been driving safely at 30mph who are going to get caught out. Colcot Road should not be 20mph. You can easily and safely drive at 30mph. Jennifer Road is also a wide road where you can easily stick to 30mph safely. Severn Avenue is also another road that should not be 20mph. 30mph is perfectly safe. Claude Road is another road that should not be 20mph. You can easily and safely drive on that road at 30mph. Broad street from the roundabout near Morrisons up until the set of traffic lights leading to the good sheds should be 30mph. It is an easy and safe road to drive at 30mph. We have been driving at 30mph for a long time safely. No one wants to make their commute even worse than it is now. 20mph is in place just to make people miserable. People should be able to protest against 20mph roads because no one wants them the way you and the rest of Wales are introducing them.

2.830 Comment 2:

2.831 Driving on 20mph on all roads is a awful idea and needs to stick with 30mph as it will cause more problems such as overtaken, people going to work late, taxis taking a passengers to a destination from A to B a lot slower leading to higher cost to of taxi travel.

2.832 Comment 3:

2.833 Redlands Road is a main commuter route. It is hilly and takes concentration to keep to 30mph on the downhill parts. Moving to 20mph will mean excessive concentration on the speedometer and less scanning of the road Redlands Road and pavements ahead. The brakes will be constantly on leading to inconsistent driving and poor interaction with other road users. This road is wide with very good visibility. Is there evidence that there are excessive accidents on this road? A general comment is that the blanket use of 20 mph zones means that the effect of lowering speed limits in vulnerable areas, such as schools, is no longer

effective. This could lead to more accidents as you no longer pay greater attention in these areas.

2.834 Comment 4:

2.835 Absolutely stupid...will cause more omissions and congestion...Drakeford is an idiot...how is this a good idea ? Ridiculous..will cause congestion...more use of fuel....more omissions...drakeford needs to go

2.836 Comment 5:

2.837 Reject this idiotic idea. It is shambolic and should not be enacted. Grow a back bone and fight this ludicrous law

2.838 Comment 6:

2.839 It is totally unacceptable and unnecessary if 30mph was adhered to 20 mph would cause more problems than safer roads, but would dramatically increase the income for speeding fines.

2.840 Comment 7:

2.841 Lowering the speed limit on the proposed roads will cause more congestion therefore increasing emissions. I travel across Barry to my place of work and to two different schools every week day and cannot see how 20mph limits will benefit anyone!

2.842 Comment 8:

2.843 What are costs - who is funding- are we just following Dictatorship (WAG) , many other councils have rejected on actual facts and historical data Increased pollution (proved) , damage to environment (proved) , unnecessary, waste of public funding, dictatorship.

2.844 Comment 9:

2.845 Cycling's lethal around Barry. I live near Dock View Road and vehicles fly down there. Speed kills.

2.846 Comment 10:

2.847 Disprove of the changes and believe the slower limited will lead to more fines and frustrated drivers. War against the motorist needs to end.

2.848 Comment 11:

2.849 Ridiculous idea, creating traffic issues and idling cars meaning more pollution in areas not currently experiencing issues. The Welsh government are strangling this country. I'm ashamed of them.

2.850 Comment 12:

2.851 Absolutely ridiculous To informed 20mph would cause tailbacks & accidents in all 30mph limits

2.852 Comment 13:

2.853 Driving for work is hard enough without having to watch your speed every second Will cause more accidents where people are watching their speedometer.

2.854 Comment 14:

2.855 This will cause chaos and the potential for more fines to the common person who is trying to survive in an (unbalanced society. Your eyes will be more focused on the speedometer than the roads? Causing more accidents.

2.856 Comment 15:

2.857 I am happy to except 20mph zones around schools but the reasoning behind the roll out of many more 20mph roads and lowering speed limits to reduce air pollution doesnt stand up and as for your cute video explaining explaining how we can now hop safely onto our bikes to cycle our children to school and then on to work is is frankly laughable ,for example , daily at all times of day and night with my work hardly any , maybe a couple a day at most , a total waste of money and effort but probably funded by Europe so thats ok then ! This utopian world the Senydd dreams about doesn't and will not exist , your decimating our tourist industry already with your ill concieved idea that forcing holiday home owners to pay up 300% over the council tax will force them to sell their property to a local , whom on the whole works in the tourist industry that is being squeased with less and less holiday accomadation thus forcing food outlets , shops etc to close , the pay for these jobs will not cover a mortgage on the value of these properties so another non Welsh home owner who can afford the house and the the added charges will just buy it , hmm really helping the lcal there arent we , maybe you should stop selling off social housing and start investing in building new affordable homes for locals who live and work in those communities . Although forcing our visitors to drive slower and take longer to travel to these destinations , will with luck more than likley manage to get them a speeding fine or two for there troubles , that will add to the council coffers . Doesnt the example of the car park known as M4 Newport to Camarthan stretch tell you that driving slowly with idling raises emmision , our roads in Wales are underfunded ,shockingly so in most areas , the actual people that need to curb their speed are sadly the ones that wont give to figs o obey the new rules as

they dont to the present speed limits anyway . Accidents are more than likely to rise as frustration sets in due to time wasted sitting around adding to a persons working day , bus services are being cut ,train services as well , costs for these are also on the up , we are mostly all working harder for less money , these measures dont seem to be thought through properly with a full consultation with the Welsh public who actually vote you in to your very well paid jobs . Yes we need to look at the future and how we can control our enviromental issues but this is a step way too far for most of the residents of Wales , put it to a full national vote if you dare .I`m sure there will be some reson that prevents that but judging by the conversations I have had over the past three years since COVID, if there were a referendum called now as to keeping or scrapping the Senydd you`d all be looking to get on your bikes and cycling to job interviews.

2.858 Comment 16:

2.859 Terrible idea. My vehicle, like make others will be screaming in 2nd gear at 20mph. Its counter productive. 30mph the revs are much lower and allow me to get into a higher gear.

2.860 Comment 17:

2.861 I agree to reduce the speed limit, most people have large cars its safer for pedestrian's also less pollution. Electric cars are so quiet you can't hear them until they get close to you. Roads are getting busier also causing bottle necks in penarth. Roads very difficult for school children also older people to cross, its a challenge.

2.862 Comment 18:

2.863 I can only comment on our area here in Dinas Powys. There are several other urban areas in the Vale where it is essential for safety, schools, parked cars, children and the elderly The lower end hill of Penyturnpike Road on the junction with Millbrook Road and leading up Mill Road should be 20mph. The traffic calming measures on this section are just not working.

2.864 Comment 19:

2.865 This country has used the motor car almost exclusively for 50 years or more. Nearly everyone has to use a motor vehicle to get to their place of work, or to reach the increasingly common supermarkets and out of town shopping areas and for many to get their children to school. for others access to hospitals are only via the motor car. I wholly agree the housing estates should be 20mph, or even 10mph in some modern compact estates. However i believe the many arteries within a village or town should remain at 30mph. In Llantwit Major those roads would be: Boverton Road, from Boverton to the library roundabout - then 20mph past the shops. Llanmaes Road. Eagleswell Road. High street, which should also have all its speed humps removed.

2.866 Comment 20:

2.867 I have chosen yes to question 5 however I think it would have been better to have multiple options rather than a simple yes or no. I personally think the plan is confusing as small sections of road are going to change but there isn't much detail on the rest of the roads. For example if a road is 30mph then suddenly changes to 20mph then back to 30mph in a short space of time this could easily confuse some drivers, make people slow abruptly causing issues with traffic behind and also there could be a problem with drivers concentrating so much on the speed limit signs rather than the road ahead; this could be dangerous. I think that all side roads and outside schools should be 20mph but I believe other main roads should be 30mph to keep traffic flow moving, maybe speed humps or other speed calming measures would be an option rather than just a speed limit sign.

2.868 Comment 21:

2.869 This is absolutely ridiculous and should not be allowed to be implemented. This has nothing to do with carbon reduction whatsoever. I don't consent to these ridiculous road speed limit changes. Around schools yes but this going one step too far.

2.870 Comment 22:

2.871 Don't agree with these restrictions on the roads whatsoever. Data shows this is nothing to do with carbon emissions and reduction.

2.872 Comment 23:

2.873 It is important that the Statement of Reasons in any TRO provides adequate information as to why the change should be made. In the case of setting a speed limit 50% higher than the national limit for such a restricted road then this is especially true to ensure correct duty of care for vulnerable road users and meet the requirements of the The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. In Schedule 2 2(d) this requires "a statement setting out the reasons why the authority proposed to make the order". "The Statement of Reasons within this TRO fails to adequately give reasons why the restricted roads in question should have a 30mph limit. The statement merely says "The Council as Local Highway Authority considers that these roads are strategic routes with higher volumes of daily traffic compared to urban residential streets and as such do not meet the criteria or the nature of a road with a speed limit of 20 mph. The Council considers that the existing 30 mph speed limit is an appropriate speed limit in order to maintain a reasonable traffic flow on higher traffic volume strategic routes." Whilst the status of being "strategic routes with higher volumes of daily traffic" is dubious in not being evidenced in any way, this is a status of a route rather than a section of a road. Regardless of such a classification, many of the sections of road where an

increase to 30mph is being sought are short stretches at the periphery of settlement which will have a 20mph limit throughout. On a logical basis if a settlement has a 20mph throughout its roads, including the so called strategic route, then allowing increased speeds on short sections at the periphery will not make any difference to traffic flow. The benefit within the "reason" of maintaining traffic flow is not a deliverable outcome. Traffic Authorities only have the ability to set a local speed limit to vary it from the national speed limit. As 20mph is already the national limit for restricted roads then the only roads where a 20mph limit may be set are where there is a national 60mph limit which applies to non-restricted (unlit) roads and the Traffic Authority wishes to set it lower than 60mph. The Statement of Reasons should also provide evidence of the resultant balance between the benefits of the change and the status quo. As the status quo after 17th September is a 20mph limit for such roads then no inclusion has been made of the disbenefits of a change to 30mph on so many of the other responsibilities in setting speed limits. These include a taking full account of the needs of vulnerable road users as referenced in both the Circular 24/2009 3.10 "The needs of vulnerable road users must be fully taken into account" and the guidance on "be fully taken into account" and the guidance on setting exceptions (2.1.3) to a 20mph limit which requires "robust and evidenced application of local factors" that indicate a speed limit other than 20mph is appropriate. This has not been provided in the Statement of Reasons. Furthermore the guidance states (2.2.11) that "Where their decision deviates from this guidance highway authorities should have a clear and reasoned case". The foundation of the guidance on setting exceptions also states that it aspires for "a maximum road travel speed 30km/h (20mph) in areas where vulnerable road users and vehicles mix in a frequent and planned manner, except where strong evidence exists that higher speeds are safe". Whilst we agree with the concept of exceptions to the national speed limit of 20mph and setting a higher limit, the requirements of both the guidance specifically in the Exceptions Guidance and also generally in the 24/2009 guidance require evidence, sound reasons and full account of the needs of vulnerable road users. These have not been provided within the Statement of Reasons for the TRO. The consequence of this is both a potential misdirection of council members in approving such a TRO and also the potential subsequent challenge of the legality of the TRO. There are also further implications regarding meeting Nolan Principles (in particular "Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias."). How can this be done if evidence is lacking and the lack of consideration of vulnerable road users discriminates against them. In addition a consideration should be made of the legal liabilities in event of any speed limit being set inappropriately higher than the national 20mph limit for restricted roads. We therefore believe that the TRO is flawed and fails to meet the duty of care required when setting alternative and higher speed limits as indicated in the above laws, regulations and guidance referenced. It should be withdrawn and re-considered.

2.874 Comment 24:

- 2.875** A section of road with a high volume of pedestrian and cycle use - including crossing the road (yes to principal question A) and poorly designed junctions at the side roads without priority for cyclists or pedestrians that makes it dangerous to make this an exception.
- 2.876 Officer response 53**
- 2.877** It is accepted that the 'Statement of Reasons' provided as part of the proposed TRO was poorly worded and did not reflect the process followed in proposing the A & B Class road exceptions identified in the TRO. However, it is the case that the process for considering proposed exceptions to the 20mph default speed limit throughout the Vale (so that so that the speed limit remains at 30mph) was carried out pursuant to the guidance provided by Welsh Government "Setting exceptions to the 20mph default speed limit for restricted roads". For further details and explanation refer to 'Officer response 1'. It is considered that the council has adequately and appropriately complied with all relevant legislation and requirements when progressing the TRO and undertaking the public consultation.
- 2.878** The 'Officer response 20 and 22' above provides appropriate comment and clarification on alleged short stretches of speed limits on roads and the relevant guidance in relation to the setting of local speed limits and recommended lengths of those speed limits on local roads. The council as the traffic authority have powers to determine local speed limits having regard to the relevant guidance in place at the time and to make speed limits, other than those on restricted roads, by order under Section 84 of the Road Traffic Regulation Act 1984. Any permanent speed limits below 30mph, other than 20mph limits or zones, require individual consent from the Welsh Assembly Government.
- 2.879** The 20mph default on restricted roads is a Welsh Government initiative. The Senedd approved with legislation to lower the default national speed limit on restricted roads from 30mph to 20mph and legislation was subsequently passed by Welsh Government on the 12th July 2022. Any concerns, or queries, relating to the consequential effects of imposing 20mph limits in rural villages and any modelling work to ascertain, or mitigate, its impacts on adjacent country roads is a matter for the Welsh Government.
- 2.880** The remit of Welsh Councils is to facilitate the necessary changes to signs and, lines associated with the change to the new default 20mph speed limit, as well as creating 30mph exceptions that would not be appropriate for 20mph in accordance with Guidance provided and published by the Welsh Government.
- 2.881** The locations that did not meet the Welsh Government's place criteria guidance, detailed below, and the two-stage test are proposed to be 30mph exceptions.
- 2.882** Place criteria:

1. Within a 100m walk of any educational setting (e.g. primary, secondary, further education and higher education).
 2. Within 100m walk of any community centre.
 3. Within 100m walk of any hospital.
 4. Where the number of residential and/or retail premises fronting a road exceeds 20 properties per km
- 2.883** The guidance for setting exceptions is intended for local interpretation by Local Authorities and also requires or allows Local Authorities to consider local factors and presence of protected facilities for pedestrians and cyclists when setting exceptions. Therefore, whilst the Place criteria is an important consideration, it is not necessarily the only singular defining factor within the guidance.
- 2.884** Consideration was given to existing cyclist and pedestrian flows along or across any of the roads that were proposed as exception sites. From experience, local knowledge, history of road traffic collisions, composition of traffic, a determination was made to retain those speeds at 30mph.
- 2.885** It is impossible to hypothesise the potential number of cyclist or pedestrian that will use a route based on perceived road safety. Perception differs from person to person and unfortunately the Welsh Government guidance did not provide any forecasting model, or formula to determine future usage.
- 2.886** The officers reviewing the proposed exception sites fully understood the Welsh Government guidance and applied the two-stage test accordingly. Bearing in mind that the Welsh Government gave no additional funding for pedestrian and traffic surveys on our strategic routes, nor did the Welsh Government provide growth factors for future cyclist and pedestrian usage based on speeds dropping to 20mph.
- 2.887** Where it was felt that the mixing of pedestrians and cyclists with motor traffic justifies the route becoming 20mph, that approval was subsequently made.
- 2.888** South Wales Police and GoSafe fully support the legislation change on 17th September 2023, and have ensured the delivery of a consistent, fair and proportionate approach to enforcement of the new speed limit.
- 2.889** Welsh Government has suggested that there would be additional funding for 2024/25 to facilitate any further amendments or finessing of speed limits where required. It will be the Councils intention to monitor the new speed limits, to take onboard any comments or concerns and determine whether changes should be made.
- 2.890** Any future amendments to speed limits will be subject to the requirements of an amendment of the current Welsh Government Circular No: 24/2009 – Setting Local Speed Limits in Wales.

3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?

- 3.1** Long term - The proposed Order will assist in delivering the Council's aim to reduce injury collisions and the severity associated with collisions as well as contribute to providing a safe and secure environment for the Vale of Glamorgan's residents and visitors.
- 3.2** Integration – The introduction of the proposed Order demonstrates an integrated approach to manage safety on the council's local highway network. It contributes to the longer-term policy of reducing traffic and its impacts on local communities by ensuring the appropriate and responsible use of the local highway network for the wellbeing of citizens.
- 3.3** Involvement – The process of developing this proposal involves communication with the local community and other stakeholders via public notice and press advert thereby contributing and delivering on the involvement agenda. Furthermore, it ensures that all of the Vale of Glamorgan Council's residents and visitors are involved regarding the management and safety of our local highway network.
- 3.4** Collaboration – The proposal will involve collaborative working in conjunction with Welsh Government, Transport for Wales, South Wales Police, local ward members, Community and Town Councils and residents through public consultation to ensure that all parties have been considered in delivering the proposals described within the report.
- 3.5** Prevention - The proposal will contribute to reducing anti-social behaviour associated with inappropriate traffic speed and play a fundamental role in the well-being objectives by protecting and enhancing the natural and build environment.

4. Climate Change and Nature Implications

- 4.1** The contractors appointed to carry out signing and road marking works on the Vale's local highway network will be required to contribute to the Council's Project Zero to tackle the climate emergency and contribute to reducing the Council's carbon emissions to net zero by 2030 wherever practical.
- 4.2** A balanced introduction of the default 20mph speed limit is crucial to influencing a driver's decision on how to get around and could assist to changing driver behaviours and encouraging the use of alternate forms of transport resulting in an effective reduction in traffic. This would have a potential positive impact on the reduction of harmful Nitrogen oxides (NOx) and carbon monoxide (CO) emissions from vehicles which are fine particles and light hydrocarbons

which contribute to poor air quality. Any reduction in air pollutants will assist in addressing any local traffic impact on the environment and human health.

- 4.3** It is considered that well structure speed limits will help to promote sustainable mobility and encourage active travel options and therefore in the future potentially assist to reduce the number of journeys by private car. This would assist in an additional positive impact on climate change and nature implications as well as encouraging people to be more active improving their general health and wellbeing.

5. Resources and Legal Considerations

Financial

- 5.1** Funding was provided by Welsh Government Grant in financial year 2022/23 to the value of £237,331 and the spend of this money was fully committed by the 31st March, 2023 in accordance with the grant conditions.
- 5.2** The capital cost for the project in financial year 2023/24 will be up to £1.59M including fees, for which a 20mph Grant has been allocated by the Welsh Government for the period 1st April, 2023 to 31st March, 2024. This must be claimed in full by 30th April, 2024 with at least 75% of the funding claimed by Quarter 3 in 2023.

Employment

- 5.3** The Traffic Regulation Order has been carried out by the Traffic Management team within Neighbourhood Services and Transport and the Legal Department.
- 5.4** The design and implementation of new signage and road markings associated with the 20mph default speed limit and exception mapping will be progressed by the council's in-house resource within its design and construction team using appropriate term contracts in place as required.

Legal (Including Equalities)

- 5.5** There are no Human Rights implications regarding this report.
- 5.6** The Road Traffic Regulation Act 1984 allows highway authorities to make and vary Orders to regulate the movement of vehicle traffic and to improve the amenities of an area.
- 5.7** The Council as Highway Authority has a responsibility to improve the safety of the highway user and may be found to be negligent if it does not meet its statutory obligations under the Highways Act 1980 and the Road Traffic Regulation Act 1984.

6. Background Papers

Traffic Management Information File 967.

THE VALE OF GLAMORGAN COUNCIL

CABINET MEMBER FOR NEIGHBOURHOOD AND BUILDING SERVICES AND
DIRECTOR OF ENVIRONMENT AND HOUSING SERVICES

PROPOSED TRAFFIC REGULATION ORDER REPORT

**PROPOSED EXCEPTIONS TO WALES 20MPH DEFAULT SPEED LIMIT,
IMPLEMENTATION OF ANCILLARY SPEED LIMITS AND REVOCATION OF 20MPH
SPEED RESTRICTION ORDER**Purpose of Report

To seek approval from the Cabinet Member for Neighbourhood and Building Services and the Director of Environment & Housing Services to introduce exceptions to the new 20mph Wales default speed limit to be introduced on 17th September 2023 retaining 30mph speed restrictions as identified on 'exception maps', implement 30mph buffer speed limits and 20mph speed limits by Order for consistency and safety as well as revoke 20mph speeds restrictions which conflict with these proposals.

Background

- In May 2019, First Minister Mark Drakeford announced that it was Welsh Government policy to set a national default 20mph limit for residential areas following for which a Task Force Group (TFG) was set up to review the proposals. The [TFG Final Report \(July 2020\)](#) set out a case for introducing a default 20mph speed limit on Restricted Roads across Wales and all 21 recommendations of the TFG [were accepted by WG](#).
- In early 2021, the Welsh Government selected and provided funding to eight separate communities throughout Wales as [First Phase settlements](#) (Pilot Schemes) to introduce 20mph speed limits with the aim to develop and refine processes to implement area-wide 20mph limits, and capture and collate a comprehensive data set to evaluate the impacts of 20mph speed limits as well as development enforcement and implementation strategies.

The Council undertook community engagement with St Brides Major and Peterston-Super-Ely ward members and the respective Community Councils, who had expressed a preference in participating in any future 20mph schemes. The Welsh Government confirmed an award of Road Safety Capital grant funding on 2nd February 2021 of £76,473 for Financial Year 2020/2021 to enable the Council to progress the implementation of the St Brides Major within their 20mph First Phase settlements or pilot programme.

The monitoring of the 20mph First Phase settlements area in St. Brides Major is ongoing and will continue for another three years. The traffic data has shown varying degrees in speed reduction, which can be attributed to changes in signage and associated engineering measures, driver perception of what is an acceptable speed, together with a communications strategy and Police enforcement.

Following evidence from the First Phase settlements, the Senedd approved legislation to lower the default national speed limit on Restricted Roads in Wales from 30mph to 20mph on 12th July 2022. The legislation supports the objectives set out in Llwybr Newydd: The Wales Transport Strategy 2021, which prioritises walking and cycling; and Future Wales, the national development framework which sets the aim for people to live in places where travel has a low environmental impact.

The Welsh Government recognise that not all Restricted Roads on which the current 30mph default speed limit applies will be suitable to change to 20mph. Therefore, an exception process has been established generally for A and B Class Restricted Roads, and local highway authorities are able consider which of these roads should remain at 30mph.

It is important to note that Local Authorities will only be required to promote a traffic regulation order where it considers a speed limit of 30mph is to remain on specific A and B Class roads within scope. Any roads defaulting to the reduced speed limit of 20mph will be because of legislation passed in the Senedd and a nationwide statutory notice published by Welsh Government will not require any new Orders or statutory consultation.

The Welsh Government published [20mph Public attitude research](#) in November 2020. They commissioned 20mph public attitude research which included a public consultation between July to October 2021 and published a report summarising the results of the [Public Consultation to reduce default speed limit to 20mph](#) in March 2022. On 17th March 2023, Welsh Government launched a public awareness campaign to inform the public on the new limits being introduced – [Introducing default 20mph speed limits](#) & [Safer at 20mph](#).

For further information, the Welsh Government has produced a webpage [Introducing 20mph speed limits: frequently asked questions](#).

Relevant Issues and Options

The Restricted Roads (20mph Speed Limit) (Wales) Order 2022 was made by Welsh Ministers on 13 July 2022 following the resolution in the Senedd to approve the legislation and draft of the Order. The Order reduces the general or default speed limit for Restricted Roads, set by section 81(1) of the Road Traffic Regulation Act 1984, to 20mph.

The purpose of new 20mph default speed limit is to reduce the number of collisions and specifically severe injuries from collisions thereby improving safety, encourage more sustainable forms of transport within local communities, improve health and well-being and help make Welsh streets a more welcoming place for everyone, including children, pedestrians, and cyclists.

The default speed limit of 20mph on Restricted Roads in Wales, except those identified as exceptions, will come into force on 17 September 2023. From that date any Restricted Road will have a speed limit of 20mph unless a different speed limit is set by the highway authority by Order. Restricted Roads are defined in [Section 82 \(1\) \(a\) of the Road Traffic Regulation Act \(RTRA\) 1984](#) as roads with a system of street lighting furnished with lamps not more than 200 yards apart. Most Restricted Roads are in residential and built-up urban areas.

Roads that are currently 40mph (or above) are out of scope for the Welsh Governments new 20mph default speed limit National Rollout program. Any future changes to speed limit on out of scope roads will be considered by the council on a case by case basis after 17th September in accordance with the proposed revision of [Setting Local Speed Limits in Wales Guidance](#) and subject to the available resource and budget at that time.

- To assist with exceptions process, the Welsh Government has produced a guidance document called '[Setting exceptions to the 20mph default speed limit for restricted-roads](#)' which was published in October 2022 and is intended for local interpretation by local highway authorities to make evidence-based decisions on setting exceptions to the default speed limit of 20mph on A and B Class Restricted Roads in Wales. Setting exceptions involves keeping the speed limit of a road at 30mph rather than it defaulting to 20mph in accordance with Welsh Government Legislation referred above.

The exceptions guidance is based on Place Criteria developed to guide highway authorities as to which sections of roads may have significant demands for people walking and cycling whilst using relevant local factors to interpret the Place Criteria to determine the need for exceptions. Exceptions based on Place Criteria and local factors will include lower density of housing, absence of schools and hospitals and other locations where there are not significant numbers of people on foot or cycle using a road and they are generally not required to mix with motor traffic. Additional details on setting exceptions is provided on the Welsh Government website [here](#).

The Welsh Government exceptions guidance criteria does not directly consider local factors such as traffic volumes, road characteristics, collision history, active travel (where there is an aspiration to provide active travel along the route and whether there is the ability to provide on-road or off-road facilities, with associated controlled crossing points) and other local attractions.

Based upon the Welsh Government guidance "Setting Exceptions to the 20mph Default Speed Limit for Restricted Roads", the council undertook a review of all 30mph speed limits on the 'A' and 'B' route network to determine which sections of road should become "exceptions" and remain 30mph. The council have referred and interpreted the guidance provided by the Welsh Government in what is considered to be a consistent, reasonable and proportionate manner based on local knowledge and evidence to establish its exception maps.

The council provided a detailed presentation to update Ward Members on the proposed Wales 20mph default speed limit and exception process on 15th and 17th November 2022 and provided a similar presentation to Town and Community Councils on 22nd November 2022. At this presentation parties attending were shown the councils draft exception maps and after interrogation it was identified that there were numerous errors which required correction. It was also agreed that the statutory public consultation period of 21 days be extended to 28 days to be compatible with the monthly cycle of Town and Community Council meetings so that the proposals could be adequately debated.

Following a detailed process of review and updating of the council's draft exception maps in conjunction with TfW to more accurately reflect the Restricted Roads that would default to 20mph under the legislation introduced by the Senedd, a second round of presentations was organised for Ward Members on 25th May 2023 to provide a further update on the Vale's implementation of the new 20mph default speed limit and offer an opportunity to review the updated exception maps as well as answer any queries that may arise. Again, a similar presentation was also arranged for Town and Community Councils on 26th May 2023.

A further presentation is planned to update the Community Liaison Committee on the current position to implement new 20mph default speed limit and review of the updated exception maps on 6th July 2023.

This Order proposes Restricted Roads (in whole or in part) to be considered as 'exception roads' where it is considered that a 20mph default speed limit will not be appropriate or feasible and in accordance with the guidance provided by the Welsh Government. A list of 26 no. sites have been identified as meeting the 'exceptions' criteria. The Order will also include proposals for a mix of 30mph buffer speed limits which act as transitions from the higher limit into the new 20mph default limit to encourage / improve compliance and additional lengths of roads which are considered appropriate to reduce to 20mph by Order for consistency and to simplify signing requirements.

This Order will also seek to revoke any existing speed limits or zones on the council's local highway network which conflict with other proposals in the Order and the introduction of the new 20mph default speed limit.

It is important to note that Local Authorities will only be required to promote a traffic regulation order where it considers a speed limit of 30mph is to remain. Any roads defaulting down to the reduced speed limit of 20mph will be as a result of a nationwide statutory notice published by Welsh Government and will not require any changes or statutory consultation with the public or other stakeholders. This information has been clearly communicated to all members and Town and community councils that have attended one of the presentations organised by officers.

Details of the proposals are outlined within Appendix 'A' and shown on the attached drawings, contained within Appendix 'B' to this report.

The council's exception mapping is proposed to be uploaded and published on Data Map Wales at the same time formal notice is published of the Vale of Glamorgan Council's intention to make this proposed Traffic Regulation Order. This will ensure that all residents within the Vale and the wider community can appropriately review and interrogate the proposed speed limit changes associated with this TRO.

Resource Implications (Financial and Employment)

Funding was provided by Welsh Government Grant in financial year 2022/23 to the value of £237,331 and the spend of this money was fully committed by the 31st March 2023 in accordance with the grant conditions.

The capital cost for the project in financial year 2023/24 will be up to £1.59M including fees, for which a 20mph Grant has been allocated by the Welsh Government for the period 1st April 2023 to 31st March 2024. This must be claimed in full by 30th April 2024 with at least 75% of the funding claimed by Quarter 3 in 2023.

The Council's own administrative resources within the Traffic Management team, Neighbourhood Services and Transport and the Legal Department will then be used to progress the proposal, should approval be given.

The design and implementation of new signage and road markings associated with the 20mph default speed limit and exception mapping will be progressed by the council's in-house resource within its design and construction team using appropriate term contracts in place as required.

Legal Implications (to Include Human Rights Implications)

All highway authorities must follow the statutory process on traffic regulation Orders to make exceptions.

The Road Traffic Regulation Act 1984 allows highway authorities to make and vary Orders to regulate the movement of vehicle traffic and to improve the amenities of an area.

The Council as Highway Authority has a responsibility to improve the safety of the highway user and may be found to be negligent if it does not meet its statutory obligations under the Highways Act 1980 and the Road Traffic Regulation Act 1984.

Additional details relating to road traffic regulations is provided on the Welsh Government website [here](#).

There are no human rights implications.

Crime and Disorder Implications

The implementation of "exceptions" to the 20mph default speed limit on the council's local highway network which will see certain Restricted Roads retain a 30mph speed limit is considered necessary to reduce the instances of aggressive driving, congestion and ultimately compliance with the prevailing road conditions.

The introduction of buffer speed limits and additional lengths of roads proposed to reduce to 20mph by Order for consistency and simplification of signage will also assist with compliance of the posted speed limit which will lead to a greater sense of safety within local communities.

Equal Opportunities Implications (to include Welsh Language issues)

There are no equal opportunity implications.

All associated traffic signs and road markings forming part of the scheme will all be in accordance with the Council's Welsh Language Policy and the Welsh Language (Wales) Measure 2011.

Corporate/Service Objectives

To manage and maintain a safe highway infrastructure.

Consultation (including Ward Member Consultation)

As this proposal is Vale wide all Ward Members were consulted on this proposal by email on 14th June 2023 with a request to provide a response by no later than Friday 16th June 2023. During this time responses were received from only four Ward Members as follows.

- > Cllr Marshallsea, Ward Member for Illtyd enquired over the proposed speed limit for Waycock cross roundabout and Broad Street.
- > Cllr Goodjohn, Ward Member for Cadoc advised Cardiff Road should not be an exception as children and vulnerable people cross the road and a reduced limit would help with safety concerns. He also indicated that he did not believe a reduction to 20 mph on Cardiff Road would have congestion consequences.
- > Cllr Thomas, Ward Member for St Augustines enquired over access to the details within exceptions map which was easily resolved.
- > Cllr Buckley, Ward Member for Cornerswell advised all noted.
- > Cllr Goodjohn, Ward Member for Cadoc advised Cardiff Road should not be an exception as children and vulnerable people cross the road and a reduced limit would help with safety concerns. He also indicated that he did not believe a reduction to 20 mph on Cardiff Road would have congestion consequences.
- > Cllr Gilligan, Ward Member for Sully raised a concern that Sully (South Road) is going to remain at 30mph going into the village from Lavernock and considered it would be beneficial to amend this to 20mph to give traffic enough time to slow down and cited the presence of Sully Sports/restaurants etc and then the library. She also advised of a future walkway to the village on Cog Road associated with the new development.
- > Cllr Perry, Ward Member for St Nicholas and Llancarfan advised that he was unclear what the reasoning is for the exemption on the A48 in St Nicholas and asked if there is a specific legal document outlining the reasons.

Where appropriate, responses or acknowledgements were sent to the above Ward Members comments with more specific responses provided to Cllr Marshallsea, Cllr Goodjohn, Cllr Gilligan and Cllr Perry as below. Both Cllr Goodjohn and Cllr Gilligan were also reminded that they and their constituents can make formal representations regarding the proposed Order during the public consultation process which will then be considered in detail.

> Cllr Marshallsea was advised Waycock Cross roundabout has a 30mph posted speed limit and is identified as an exception to remain at 30mph and Broad Street will default to 20mph from Gladstone roundabout to Windsor Road junction.

> Cllr Goodjohn was advised his comments would be noted in the report and that the council has referred and interpreted the guidance provided by the Welsh Government to identify exception roads to remain at 30mph.

> Cllr Gilligan was advised her comments would be noted in the report and that decisions on exceptions should not be influenced by existing traffic speeds. It was also clarified that Cog Road is not an A or B Class road subject an exception and will default 20mph speed limit over the extent that it is classified as a Restricted Road.

> Cllr Perry was reminded that the Welsh Government guidance “Setting Exceptions to the 20mph Default Speed Limit for Restricted Roads” was used when setting exceptions and that a detailed rationale for the exception on A48 St Nicholas was provided to him via email on 13th June 2023.

For completeness, the email comments received and replies sent to the four Ward Members can be viewed in full [here](#). Also included is the initial consultation email to all Ward Members and a copy of the email previously sent to Cllr Perry on 13th June 2023.

Stakeholder consultations will take place in accordance with the Road Traffic Regulation Act 1984 and The Local Authorities Traffic Orders (Procedure) (England and Wales) (Amendment) (Wales) Regulations 1996.

The statutory period of public consultation is 21 days, however, to be compatible with the monthly cycle of Town and Community Council meetings it has been agreed to extend the consultation period to 28 days.

RECOMMENDATION(S)

- (1) That, subject to the views of the Chief Constable and other statutory consultees, approval is given to give public notice of the Vale of Glamorgan Council’s intention to make a Traffic Regulation Order, the effect of which will be to introduce exceptions to the new 20mph Wales default speed limit retaining 30mph speed restrictions as identified on ‘exception maps’, implement 30mph buffer speed limits and 20mph speed limits by Order for consistency and safety as well as revoke 20mph speeds restrictions which conflict with these proposals as outlined in appendices ‘A’ and ‘B’ to this report.
- (2) That in the event of no objections being received, the Order be made.

Reason(s) for Recommendation(s)

- (1) To comply with the requirements of the Road Traffic Regulation Act 1984.

(2) To allow the necessary works to be undertaken.

Background Papers

Traffic Management Information File No. IF967



Contact Officer

Michael Clogg, Operational Manager Engineering

Officers Consulted

Operational Manager, Legal Services - (Committee Reports)

Accountant, Neighbourhood Services - (Matt Sewell)

APPROVED	DATE
Director of Environment & Housing Services	
	20 th June 2023
Cabinet Member Neighbourhood and Building Services	
	20 th June 2023

APPENDIX A

Schedules comprising Appendix A saved [here](#).

APPENDIX B

Plans comprising Appendix B saved [here](#).

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cycling
uk

19 JUL 2023

THE VALE OF GLAMORGAN COUNCIL
VISIBLE SERVICES & HOUSING

1.50pm

Traffic Regulation Order

THE VALE OF GLAMORGAN COUNCIL
(VARIOUS ROADS 20MPH & 30MPH SPEED RESTRICTION)

REVOCATION AND EXCEPTIONS ORDER 2023

Cycling UK objections

The proposed order

The Vale of Glamorgan Council (VoGC) gave notice (the notice) on 22 June 2023 that it proposed to make Traffic Regulation Orders (TROs) pursuant to the relevant sections of the Road Traffic Regulation Act 1984 (RTRA). The proposed orders would exempt certain roads from The Restricted Roads (20 mph Speed Limit) (Wales) Order 2022 (the Wales 20mph order) as specified in the schedules to the notice.

Anyone seeking to make representations or object to the orders has until midnight on 19 July to do so in writing. This submission sets out Cycling UK's objections to the orders.

Cycling UK is a UK-wide cycling charity with over 2,000 members in Wales, including members and groups within the Vale of Glamorgan.

This response is being submitted by and on behalf of Cycling UK's national office; however, separate responses setting out objections to these TROs have already been submitted by Cycling UK partner group Vale Velo Ways, and by Cycling UK member [redacted]. [redacted] Vale Velo Ways' response refers to specific roads and particular TROs referred to within the schedule to the notice. [redacted] response references inter alia Cycling UK's interest and involvement. To avoid repetition within this response, Cycling UK nationally adopts, supports and repeats the submissions and objections set out within both of those responses.

In addition to those submissions, Cycling UK makes the following additional points and objections, focussing mainly on VoGC's failure to have regard to the relevant legislation, national guidance, or conduct a fair and lawful consultation.

Road Traffic Regulation Act 1984 (RTRA)

VoGC can make an order under section 1 of the RTRA where it considers it “expedient having regard to a number of factors” (the statutory purposes). Those statutory purposes are:

- a) for avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising, or
- (b) for preventing damage to the road or to any building on or near the road, or
- (c) for facilitating the passage on the road or any other road of any class of traffic (including pedestrians), or
- (d) for preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property, or
- (e) (without prejudice to the generality of paragraph (d) above) for preserving the character of the road in a case where it is specially suitable for use by persons on horseback or on foot, or
- (f) for preserving or improving the amenities of the area through which the road runs
- (g) for any of the purposes specified in paragraphs (a) to (c) of subsection (1) of section 87 of the Environment Act 1995 (air quality).

Where a highway authority (HA) issues a notice proposing to make a TRO, that notice must include a statement of reasons (SoR) outlining the reasons for the order, which must have regard to and identify the statutory purposes for which it is satisfied that it is expedient to make the TRO. The SoR within the notice issued by VoGC on 22 June states that:

“The Order is necessary to maintain the existing speed limits of 30 mph on selected strategic roads within the County after the Welsh Government has passed legislation to implement a 20mph default speed limit in urban areas nationally throughout Wales in the interest of road safety (The Restricted Roads (20 mph Speed Limit) (Wales) Order 2022). The Council as Local Highway Authority considers that these roads are strategic routes with higher volumes of daily traffic compared to urban residential streets and as such do not meet the criteria or the nature of a road with a speed limit of 20 mph. The Council considers that the existing 30 mph speed limit is an appropriate speed limit in order to maintain a reasonable traffic flow on higher traffic volume strategic routes.”

There is nothing within the SoR which refers to danger to road users, preventing damage, preserving amenities or any of the other statutory purposes. The SoR does refer to maintaining the speed limit to “maintain a reasonable traffic flow”, however that is insufficient to satisfy the statutory purpose with S1(1)(c) RTRA, which requires the HA to consider how to facilitate the passage on the road of any class of traffic, including pedestrians and cyclists.

VoGC has not:

- Identified which class of traffic it wishes to facilitate the passage of.
- Mentioned or in any way demonstrated that it has considered the requirements, passage, or safety of any or each class of traffic.
- Addressed in any way any safety issues.

When considering whether to make a TRO, VoGC also has a statutory duty to consider the matters outlined at section 122 RTRA, “to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians)”. It is clear from the SoR that VoGC has failed to consider, adequately or at all, the expeditious, convenient and safe movement of cyclists and pedestrians.

Welsh Government guidance on setting exemptions to the 20mph default speed limit on restricted roads

The Senedd has approved legislation to lower the default national speed limit on restricted roads from 30mph to 20mph to reduce the number and severity of collisions and casualties, to enable more people to use active travel, to reduce environmental impacts and to improve people’s quality of life in communities across Wales. That legislation comes into effect on 17 September 2023. The roads to which these TROs relate are restricted roads, and accordingly, unless they are exempted from the new 20mph default speed limit through the TRO process, the speed limit on those roads will be reduced from 30mph to 20mph in September.

Whether or not any particular HA supports or otherwise agrees with the changes introduced by the Senedd is, respectfully, irrelevant. The new default limit applies unless the HA makes a TRO exempting the default limit. To ensure that a consistent approach to exemptions across Wales is taken by HAs, the Welsh Government has introduced guidance (the guidance) on setting exceptions: <https://www.gov.wales/setting-exceptions-20mph-default-speed-limit-restricted-roads.html> to the default limit. The guidance is to be used as a basis to demonstrate reasoning for making any exception, and includes a two stage test, set out below, which involves HAs asking themselves two principal questions when deciding whether a 30mph exception should be made, namely:

Question A: Are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?

If the answer to A is ‘no’ then an exception for a 30mph speed limit may be appropriate.

Question B: If the answer to A is ‘yes’, are the pedestrians and cyclists mixing with motor traffic?

If the answer to B is ‘no’ then a 30mph speed limit exception may be appropriate.

If the answer to B is ‘yes’ then a 20mph speed limit will be appropriate unless the robust and evidenced application of local factors indicates otherwise.

It is important to note that question A refers to the potential numbers of pedestrians and cyclists who might travel along or cross the road if the speeds were lower, not just the existing numbers, given that the existing numbers may well be lower than they could be, because people will be deterred from using active travel modes if the road conditions do not feel safe. Part of the rationale for the introduction of the new default limit was to lower existing speeds on restricted roads, so that more people felt that it was safe enough to walk or cycle, and to enable more active travel journeys. Accordingly, the guidance specifically states that decisions on exceptions should not be influenced by existing traffic speeds.

VoGC has manifestly failed to address the criteria within the guidance or consider the two stage test set out within the guidance. It has merely asserted that “these roads do not meet the criteria or the nature of a road with a speed limit of 20 mph”. There is no evidence or information to suggest that VoGC has:

- Considered the existing cyclist and pedestrian flow along or across any of the roads subject to these TROs.
- Considered the potential cyclist and pedestrian flow along or across any of these roads, if the speed limit was reduced.
- Considered the extent to which pedestrian and cycle flow along or across any of these roads is deflated or discouraged by perceived or actual road safety concerns.
- Understood, or considered adequately or at all, the guidance, and in doing so addressed the two stage test within the guidance.

Unfair consultation process

Attention is drawn to the Gunning Principles on fair and lawful consultation, namely that:

- Consultation must be at a time when proposals are still at a formative stage
- Sufficient reasons must be put forward for any proposal to permit ‘intelligent consideration’ and response
- Adequate time is given for consideration and response
- The product of consultation is conscientiously taken into account by the decision maker(s).

Put simply, these criteria are a prescription for fairness and mean that a public body must: consult before they have made up their mind; provide people with the right kind of information for them to be able to take part in the consultation; give people enough time to participate and respond; and give consultation responses conscientious consideration.

As already outlined, VoGC appears to have concluded already that the roads subject to these TROs are strategic routes with higher volumes of daily traffic compared to urban residential streets and as such do not meet the criteria or the nature of a road with a speed limit of 20 mph. No evidence has been presented to support that contention, and that argument is presented in a manner which implies that VoGC believes that to be the relevant test.

In fact, as already outlined, VoGC has failed to consider the statutory purposes within the RTRA, and to that extent, the nature and limitations upon its powers to make lawful TROs. It has also failed to consider adequately or at all the relevant guidance.

In responding to this consultation, Cycling UK and indeed others, can only respond to the information provided. It is unreasonable and unfair to require anyone to respond to matters, evidence, or things that were in the minds of council officers when they launched this consultation but failed to set out accurately or at all within the SoR or accompanying documents.

If, in response to this and other consultation responses, VoGC now wish to refer to other data, evidence, or arguments not previously presented in a manner in which the public could readily understand and respond to, then the public have not been provided with sufficient reasons by VoGC for the proposals to permit 'intelligent consideration' and response. To that extent the consultation process is flawed, unfair, and unlawful.

Conclusion

VoGC has misdirected itself regarding the powers available under the RTRA and failed to consider adequately or at all the statutory purposes under S.1 RTRA. It has also failed to consider adequately or at all the guidance on exemptions from the default speed limit, and made proposals for exemptions without any or adequate consideration of the relevant legal framework, criteria or national guidance. It has also provided inadequate reasons and explanation for its proposals within the consultation, failing to provide the public with an opportunity for intelligent consideration and response, rendering the consultation process flawed and unlawful.

If VoGC wishes to make these orders, Cycling UK would require VoGC to provide a full response to the points and concerns raised within this submission.

Duncan Dollimore, head of campaigns and advocacy, Cycling UK

19 July 2023





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19 JUL 2023

THE VALE OF GLAMORGAN COUNCIL
VISIBLE SERVICES & HOUSING
1-50pm

Vale Velo Ways / Llwybrau Beic y Fro

[Redacted]
Tudor Place
[Redacted]
LANTWIT MAJOR
[Redacted]
CF61 1TH
[Redacted]
valeloways@gmail.com
[Redacted]
07977 117 937

By hand
Director of Environment and Housing,
Vale of Glamorgan Council,
Alps Depot,
Wenvoe,
CARDIFF
CF5 6AA

19th July 2023

Dear Mr Punter,

**20mph Speed Limit Exceptions Consultation
Response from Vale Velo Ways / Llwybrau Beic y Fro**

Please find enclosed our response to the above consultation.

You're welcome to contact me with any comments or queries.

Yours sincerely

[Redacted]
Oliver Leonard
Member

[Redacted Signature]

[REDACTED]

[REDACTED]

[REDACTED]

Vale Velo Ways Response to the Vale of Glamorgan's "20mph Speed Limit Exceptions Consultation"

July 2023

1. Executive Summary

Vale Velo Ways / Liwybrau Beic y Fro represents the ordinary person travelling by bike in and through the Vale of Glamorgan.

The Wales-wide 20mph default speed limit has a number of intentions, notably to:

- reduce the number of collisions and severe injuries from them
- encourage more people to walk and cycle in our communities
- help to improve our health and well-being
- make our streets safer
- safeguard the environment for future generations

We note that the VoG intends to apply a number of exceptions to the default speed limit. Vale Velo Ways (VWV) contends that in determining its exceptions, the VoG Council has not considered the needs of non-motorised road users. We've sought advice on the legality of this position.

2. Background

Wales' largest town, Barry, grew during its coal-exporting past at the end of the 1890s. Its wide avenues of Pontypridd Road and Gladstone Road are prime candidates for active travel infrastructure, but are today devoted to the movement and storage of private motor vehicles. To exempt these roads from 20mph is to entrench attitudes to movement and health of people that should be consigned to the 1990s. The Vale of Glamorgan has a historic opportunity to build a transport infrastructure that's fit for the 2090's and beyond. Had it already installed cycling infrastructure on these roads, then exceptions could be justified; unfortunately, this has not been the case.

In this document, VWV sets out its response to the Vale of Glamorgan's "20mph Speed Limit Exceptions Consultation".

In the *Setting Exceptions to the 20mph... guidance document*¹, the Welsh Government sets out the process for adding exceptions to the default speed limit. In Section 2.1.3, the Government sets two Principal Questions which should be considered by highway authorities when deciding whether a 30mph exception should be made:

Question A: Are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?

If the answer to A is 'no' then an exception for a 30mph speed limit may be appropriate.

Question B: If the answer to A is 'yes', are the pedestrians and cyclists mixing with motor traffic?

¹ <https://www.gov.wales/setting-exceptions-20mph-default-speed-limit-restricted-roads-html>

If the answer to B is 'no' then a 30mph speed limit exception may be appropriate.
If the answer to B is 'yes' then a 20mph speed limit will be appropriate unless the robust and evidenced application of local factors indicates otherwise.

VVW contends that in the vast majority of the 'excepted' roads across the VoG, the answer to each question is 'yes', which puts the onus on the VoG to supply robust evidence that a 30mph exception is appropriate.

3. VoG's justification for the TRO

VVW notes that the VoG is applying for the Traffic Regulation Orders and that the VoG considers that "The Order is necessary to maintain the existing speed limits of 30 mph on selected strategic roads within the County."²

In the *WG Exceptions* document, at Section 2.2.1. It is clear that "Decisions on exceptions should not be influenced by existing traffic speeds".

This is a clear application of *post hoc ergo propter hoc* - the presence of an existing 30mph limit is not in itself justification for keeping that limit in place and will do nothing to make the Vale a safer place for non-motorised transport.

4. Consideration of proposed Traffic Regulation Orders (TROs)

VVW has examined the proposed TROs for the Vale and does not intend to challenge the validity of each one. Some of the proposed TROs in the rural value seem sensible - for example, T/23/106/WS on the blind bend at **Llandow** is a buffer to the 20mph in the village, as is T/23/112/WS at **Marcross** on National Cycle Network Route 88.

Absent from the TRO plans is the section to the west of Clare Garden Village, **Cowbridge** at X298032 Y175007. VVW notes that this is shown on the Welsh Government exceptions map³, but is not included on the VoG's TRO Exceptions plan maps.

Having taken advice from Cycling UK, VVW is not satisfied with the legality of the following TROs. If they were to be implemented, the VoG will be in a weak position, were they to be contested.

Starting in **Barry**, Pontypridd Road (T/23/127/MS) and Gladstone Road (T/23/130/MS) are active travel missing links in the VoG's transport network. Both are wide roads with half their width devoted to the storage of motor vehicles. These roads give a clear yes to both of the Principal Questions, and more than one of the Place Criteria set out in the Welsh Government exceptions document. If the VoG is going to deviate from Government Guidance, then a clear and reasoned case must be given. Maintaining existing motor traffic speeds is not sufficient reason for an exemption.

²<https://www.valeofglamorgan.gov.uk/Documents/Our%20Council/Legal%20Notices/2023/NOP-Variou-Roads-20mph-Exceptions.pdf>

³ <https://datamap.gov.wales/maps/roads-affected-by-changes-to-the-speed-limit-on-re/>

Still in **Barry**, the triangle of roads south of Park Crescent (T/23/128/MS) are a clear yes to both Principal Questions, and fulfil all of the Place Criteria. VVW's objections match those for T/23/127/MS, above.

TRO T/23/129/MS, also in **Barry**, is more problematic. This is the long section from Gladstone Bridge in the north, and along Ffordd y Mileniwm from Hood Road in the west to the Docks Office in the east. Whilst segregated shared-use paths are provided in this section, the sheer numbers of actual and potential non-motorised travellers moving to and from the waterfront dwellings and the retail premises mean that the answers to both Principal Questions should be 'yes', and the VoG must address how these vulnerable road users will be protected from motor traffic travelling at speeds of over 20mph. The new school at the western end of this section fulfils the 'Place' criteria. The VoG must give a clear and reasoned case as to why it intends to deviate from Government Guidance.

Moving out of Barry, we arrive at the A48 in **St Nicholas** (T/23/120/MS). The response to this proposed TRO is relatively simple - either the road has a 20mph limit, or fully segregated active travel provision is constructed. As noted elsewhere in this submission, the presence of high volumes of motor traffic does not pass the Government test for exceptions from default 20mph. Both Principal Questions here are answered 'yes' so, again, the VoG must give a reasoned case as to why it intends to ignore Government guidance, bearing in mind that the speed and volume of motor traffic are not valid reasons for exceptions.

Towards **Penarth and Dinas Powys**, we arrive at the **Merrie Harrier Junction** (T/23/111/WS and T/23/109/WS). Renowned for its queuing motor traffic, these sections of road are key bottlenecks for travel from the Vale into Cardiff. The lack of active travel provision is horribly apparent to the non-motorised road user. Both Principal Questions here are answered 'yes', and again, the VoG cannot use the contention that the speed of motorised traffic takes precedence over other modes.

The cynical active traveller in the Vale may feel that many of the proposed TRO exceptions have been placed at those locations which are currently most hostile to the traveller without a motor vehicle. VVW contend that the traveller would be vindicated in their feelings, especially when they arrive at **Dinas Powys** (T/23/110/WS). This is another key travel route - this time for travellers from Barry moving towards Cardiff. The potential number of those walking and cycling this route is hindered by the volume and danger of motorised traffic - it is exactly these conditions that 'default 20' is intended to counter. By matching motor speed more closely to that of active travellers, potential harm is reduced. Until the proposed active travel route along this corridor is constructed, the Principal Questions require that this route cannot be exempted by use of a TRO.

VVW will end this submission in the western Vale. At **St Brides Major** (T/23/102/MS), it would appear that the existing 20mph limit is being removed. Given that this east-west link is a core corridor for active travellers, and that the answer to Principal Question A is 'yes', and that of Question B is also 'yes', VVW is keen to hear the VoG's robust reasoning for removal of the current 20mph limit.

Into **Ogmore by Sea** (T/23/95/MS) and **Southerndown** (T/23/96/MS), these beautifully scenic routes are enjoyed by the motorised road user as well as the active traveller.

Evidence amongst VVW's membership points to the current under-use of these sections by active travellers due to the preponderance of motor traffic. Principal Question A is clearly answered in the affirmative, as is Question B. There is no question that this route should remain at default 20. Again, the presence of motor traffic does not in itself, justify an exception to that, and VVW is keen to hear the VoG's robust defence of this exception.

Finally, we arrive at T/23/126/MS around **Eweny** and **Corntown**. Part of this section is the National Cycle Network Route 88 (NCN). It almost defies belief that a TRO exception could be considered here, as the presence of the NCN in and of itself answers Principal Questions A and B before they are asked. Significant numbers of active travellers are already using this section of the Vale's roads, with the potential for very many more with the advent of default 20. It is clear from the proposal that the VoG Council has not considered the role of the non-motorised road user in the application of these TRO exceptions across the Vale.

5. Conclusion

Vale Velo Ways want to make a success of the roll out of 20mph in the Vale of Glamorgan. To this end, please be assured of our best intentions that we are, and intend to remain, a trusted partner to the Vale of Glamorgan.

HARRISON GRANT RING

SOLICITORS

Temple Chambers, 3-7 Temple Ave, London, EC4Y 0HP
0208 050 8601

www.hgrlaw.co.uk

Miles Punter,
Director of Environment and Housing,
Vale of Glamorgan Council,
Alps Depot,
Wenvoe,
CF5 6AA

By email only: [REDACTED]

Cc: [REDACTED]

[REDACTED]

[REDACTED]

Our ref: PER00003

Your ref: IF 967

19 July 2023

Dear Mr. Punter,

Objection to the Vale of Glamorgan Council (Various Roads 20mph & 30mph Speed Restriction) Revocation and Exceptions Order 2023, St Nicholas Area (A48) (Schedule 2, Drawings T/23/82/WS and T/23/120/MS) ("the Proposed TRO").

1. We are instructed by [REDACTED] on behalf of the St Nicholas with Bonvilston Community Council ("**our client**").
2. We write on behalf of our client to raise strong objections to the Vale of Glamorgan Council ("**the Council**"), as the traffic authority, in relation to the Proposed TRO, specifically in relation to the proposed St Nicholas Area (A48) exception.

The Legal and Policy Framework

3. The Restricted Roads (20 mph Speed Limit) (Wales) Order 2022 ("**the 20mph Order**"), made by Welsh Ministers on 13 July 2022 reduces the general speed limit for restricted roads¹, to 20mph from 30mph as set by section 81(1) of the Road Traffic Regulation Act 1984 ("**the RTR Act**").

¹ A 'restricted road' being defined as a road in England and Wales with "a system of street lighting furnished by means of lamps placed not more than 200 yards apart" (s82(1) of the Act).

4. The 20mph Order will come into force on 17 September 2023. From this date, all restricted roads will have a speed limit of 20mph.
5. Under s84(1) of the Act, the Council, as the relevant traffic authority, may by Order under the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 ("**the TRO Regulations**"), set a different speed limit.
6. The Welsh Government has issued guidance, 'Setting exceptions to the 20mph default speed limit for restricted roads' (8 November 2022) ("**the Guidance**"), for local authorities to make 'evidence-based decisions on setting exceptions to the default speed limit of 20mph'.
7. Our client's overarching position is that - in using the Guidance as a methodology - and taking local factors and circumstances into account (as the Guidance intends, see para 1.1.3), as well as ensuring local, national and international policy, which the 20mph Order is predicated on, is not undermined (para 1.2.2 and 1.2.3 of the Guidance) – the St. Nicholas Area (A48) exception contained in the Proposed TRO is not rational, consistent, or justifiable.

Relevant exception test (Paragraph 2 of the Guidance)

8. There can be no doubt that the St. Nicholas Area (A48) is a "restricted road", otherwise the TRO would not be necessary.
9. Paragraph 2 of the Guidance lays down the principles to consider when making an exception to the default 20mph limit for restricted roads.
10. It states that, in line with the Welsh Government's aspiration to meet Article 11 of the Stockholm Declaration of 2020:

'a 20mph speed limit should be set where pedestrians and/or cyclists and motor vehicles mix in a frequent manner, except where strong evidence exists that higher speeds are safe.' (para 2.1.2 of the Guidance).
11. The Proposed TRO professes that the St. Nicholas Area (A48), an existing 30 mph road, does not meet this test and therefore the speed limit should be retained as an exception to the 20mph default speed limit for restricted roads.
12. However, for the Council to arrive at this conclusion it must satisfy itself with regards to the following questions set out at paragraph 2.1.3 of the Guidance:
 - a. *"Are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?"*

If the answer to this question is no, then an exception for a 30mph speed limit may be appropriate;

- b. *If the answer to A is 'yes', are the pedestrians and cyclists mixing with motor traffic?*

If the answer to B is 'no' then a 30mph speed limit exception may be appropriate. If the answer to B is 'yes' then a 20mph speed limit will be appropriate unless the robust and evidenced application of local factors indicates otherwise."

13. The Council relies, however, within the Statement of Reasons set out in the Proposed TRO, on a justification based not on the methodology as required by the Guidance, but that the exception is:

'necessary to maintain the existing speed limits of 30mph on selected strategic roads within the County'; and that

'these roads are strategic routes with higher volumes of daily traffic compared to urban residential streets and as such do not meet the criteria or the nature of a road with a speed limit of 20 mph; and

'the existing 30 mph speed limit is an appropriate speed limit in order to maintain a reasonable traffic flow on higher traffic volume strategic routes.'

14. There is no discernible exception criteria for "higher volumes of daily traffic". Indeed, our client wishes to draw the Council's attention to the A48 Western Avenue in Cardiff between Cardiff Road and the River Taff which is 4-lanes and carries a higher volume of traffic than the A48 at St Nicholas and will be subject to the 20mph default speed limit.

15. We now go through the appropriate tests, as set out in para 12 above.

A. Are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?

16. Paragraph 2.2.8 identifies 'place' criteria which have been developed to assist highways authorities in answering this first question and determine, 'in a consistent way across Wales', which sections of roads may have significant demands for people walking and cycling.

17. The 'place' criteria include of relevance here:

- a. Within a 100m walk of any educational setting (e.g. primary, secondary,

- further education and higher education;
- b. Within 100m walk of any community centre; and
- c. Where the number of residential and / or retail premises fronting a road exceeds 20 properties per km.

18. In a response from the Council to the elected ward member for St Nicholas and Llancarfan of 13 June, the Council discounted the proximity of the St. Nicholas Church in Wales Primary School based on a GIS system measurement of 135m. However, this assessment failed to take account of the school building used to teach first year pupils at the school, which is just 79m from the A48 (measured by trundle wheel) and therefore comfortably within the 100m criterion. An annotated map of this building is reproduced below, with the relevant building labelled as 'small school'.

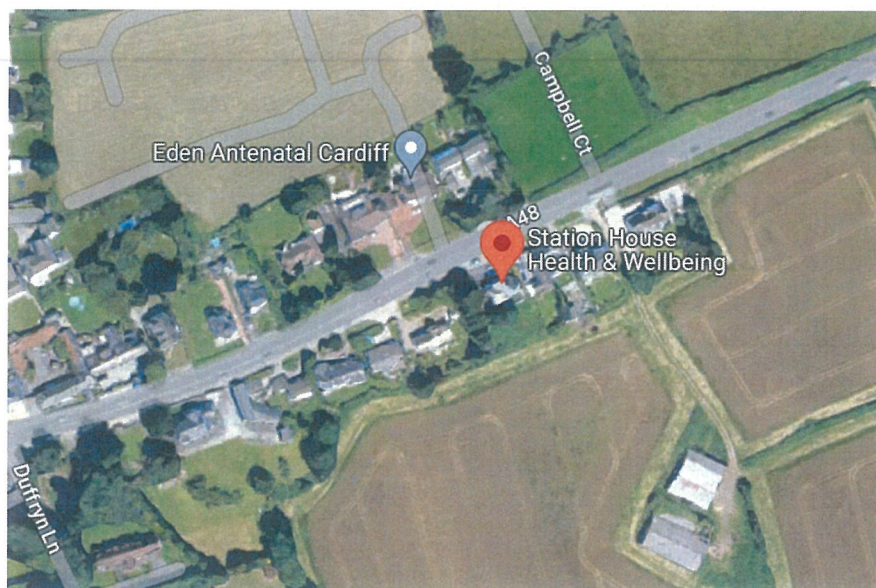


19. Paragraph 2.2.16 offers further support and states that there may be sections of the road where there are significant demands, for walking and cycling, even where the place criteria are not met but where a 20mph speed limit would be appropriate, such as regularly used accesses to schools are along the road, even where this may be more than 100m from the main entrance. The main access to the school is off the A48 up School Lane (identified in red on the map above).

20. In relation to the second 'place' criterion, the Guidance is not clear on what it means by a community centre. However, Planning Policy Wales (2021) ("**PPW**") stresses that community facilities contribute to a sense of place which is important to the health, well-being and amenity and can include schools, cultural facilities, health services, libraries, allotments and places of worship (paragraph 4.4.1 PPW).

21. In this regard, we note the following community centres bordering or in close proximity to the A48:

- a. St Nicholas Church and graveyard - The church and access to the churchyard from the A48 is shown in black on the map. From the road to the church gate is clearly less than 100m. The church is in use for services, weddings and funeral and the graveyard is open daily. It is grade 2 listed (as is a tomb within the churchyard) and serves as a starting and resting point for popular walks – Valeways Millennium Heritage Trail, A Ridge and Valley Walk, & Haunted Field Walk.
- b. Station House Health and Wellbeing – This facility is located on the A48 and provides a range of health services and is open daily.



- c. The Presbyterian Church of Wales chapel at Trehill – The chapel is located less than 100m off the A48 and has services every Sunday at 11am.



d. The Church Hall/Tinkins Hall – this former church hall is located directly on the A48. It is currently under private ownership, however, an application for change of use into residential use was rejected, and the resulting appeal withdrawn (ref. CAS-02068-D9F3K6). Therefore, in considering *potential* numbers of walkers and cyclists if the speed was lowered to 20mph as is required under the Guidance, regard must be had to the *possibility* that the church hall will return to some kind of community use.

22. St. Nicholas also has more than 20 residential dwellings per km fronting the A48, and therefore satisfies a further criterion of 'place'.

23. Paragraph 2.2.9 of the Guidance states that sections of the road which meet '*any of these Place criteria should be considered to positively answer principal question A*'.

24. Taking the above criteria into account, the answer to the first question posed by the Guidance (*Are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?*) must unequivocally be yes.

25. The Guidance further states that where there is a deviation from the Guidance, highway authorities should have a 'clear and reasoned case' (paragraph 2.2.11). The Proposed TRO, with its justification for the exception contained largely in the Statement of Reasons, cannot be said to set out a 'clear and reasoned case', because it is not supported by evidence as to why high-traffic volumes should exempt this area.

B. If the answer to A is 'yes', are the pedestrians and cyclists mixing with motor traffic?

26. The answer to this question is also 'yes' given the proximity of the school, community centres and residential dwellings along the route.

27. The width of the footways alongside the route, at just 1.2m, mean fast moving traffic and pedestrians mix in close proximity.

28. There are also several entrances with poor or deficient sightlines along the A48 which mean that pedestrians and cyclists are discouraged from using the route due to safety concerns from fast moving traffic.

29. Further, the noise of the traffic travelling along the A48 also prevents many potential pedestrians and cyclists from using the road in this way. Traffic travelling at 30mph generates twice the ambient noise of traffic travelling at 20mph².

30. A question posed to the Mayor of London in a recent London Assembly meeting asked, "*What analysis has been made of possible improvements to air quality as a result of*

² <https://www.20splenty.org/airandnoise/pollution>

reducing speed limits to 20 mph in London?"The answer was:

"Lowering traffic speeds reduces the dominance of motor vehicles and makes our streets safer, more inviting, less polluted and more attractive for walking, cycling and public transport trips."

"An evaluation of 20mph zones in London, carried out by Imperial College, showed slowing traffic had no net negative impact on exhaust emissions. However, in 20mph zones vehicles moved more smoothly, with fewer accelerations and decelerations, than in 30mph zones. This smoother driving style reduces particulate emissions from tyre and brake wear - which still represents a significant cause of air pollution from zero-emission vehicles."³

31. The answer to question B is therefore also, yes.

32. Even if the Council could legitimately consider that the answer to B is no, where there is significant demand / potential demand for walking and cycling as identified in A, exceptions may *only be appropriate* if protected facilities are provided for pedestrians and cyclists which meet Active Travel Act Guidance 2021 ("**ATAG**") (paragraph 2.2.18 of the Guidance).

33. Such protected facilities include:

- a. Footways in accordance with s9.6.2 of ATAG which stipulates that basic footway widths should be 2.0m. The footways on the A48 are just 1.2m;
- b. Cycle provision along the route is 'suitable for most people' based on Table 11.1 of the ATAG, which will usually require physical protection from motor traffic. There is no physical protection for cyclists on the A48 from motor traffic.

34. There is therefore clearly an absence of appropriate protected facilities under the ATAG.

Robust and evidenced application of local factors

35. As the answer to both question A and question B is yes, the Guidance stipulates that 'a *20mph speed limit will be appropriate unless the robust and evidenced application of local factors indicates otherwise.*' (paragraph 2.1.3 of the Guidance)

36. The justification set out by the Council and reproduced at paragraph 13 of this objection does not follow the Guidance, and further abjectly fails to provide any robust or evidenced application of local factors to indicate why this is the case.

³ <https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/20mph-speed-limit-and-air-pollution>

37. Further, it fails to follow the examples of how to apply relevant local factors as set out in paragraphs 2.2.12 – 2.2.16 of the Guidance.

38. Any proper scrutiny of local factors as set out in the Guidance would, in our client's view, solidify the argument for the St. Nicholas (A48) section to be retained in the 20mph Order, such as:

- a. Regularly used accesses to schools along the road, even if some are more than 100 metres from their main entrances;
- b. Regularly used access to community centres located on or less than 100 metres from the road;
- c. Relevant demands and potential demands for walking and cycling;
- d. There is a designated active travel route on the carriageway;
- e. Where the number and/or type of collisions occurring along the road means road users and the local community could gain significant road safety and other benefits from a speed limit of 20mph.

39. Dealing with these local factors in turn:

- a. the distances between the school accesses have been dealt with in paragraphs 18-19, but even if one were to entertain the Council's generous distance measure, the Guidance still encourages a consideration of this as a local factor;
- b. The St Nicholas Church and graveyard, the Station House Health and Wellbeing Centre, the Presbyterian Church of Wales chapel at Trehill and the Church Hall are all located either on or less than 100m from the road. Each of these sites are regularly accessed by pedestrians;
- c. Both the schools and the community centres, as well as the residential properties located on either side of the A48 create relevant demands and potential demands for walking and cycling;
- d. An Active Travel Route is proposed on a stretch of carriageway encompassing St. Nicholas (A48). The Welsh Government has funded a consultation for an Active Travel Route connecting Culverhouse Cross to the Five Mile Lane through St Nicholas. It is currently in the route design phase and further funding is being sought from the Welsh Government. The A48 is already a popular route with club cyclists.
- e. The highways authority has not provided or considered data relating to the number and/or type of collisions occurring on the road and, by email response to the elected member for St Nicholas and Llancarfan dated 21 June, it erroneously concludes that collision history is not relevant: "*The exceptions guidance does not directly consider local factors such as... collision history*".

40. It has been acknowledged by officers, at a scrutiny committee meeting on 18 July 2023, that the Statement of Reasons is "inaccurate". This reinforces the inadequate nature of

the justification put forward by the Council. It also undermines the adequacy of the consultation.

Policy support

41. The 20mph Order supports Llwybr Newydd: The Wales Transport Strategy 2021 which prioritises walking and cycling above other modes of travel; Future Wales, which aims for people to live in places where travel has a low environmental impact; and aspires to meet the aims of Article 11 of the Stockholm Declaration in relation to reducing speeds except where strong evidence exists that higher speeds are safe.
42. Other potentially relevant policy considerations include the Welsh Noise and Soundscape Action Plan (2018-2023) ("**the Action Plan**"), which includes the St. Nicholas area. We know that speed and noise are evidentially connected – see paragraph 29 above.
43. The Action Plan strongly encourages public bodies to give due consideration to the Action Plan to the extent that it aligns with and supports the requirements of cross-cutting legislation such as the Wellbeing of Future Generations Act 2016 ("**WFG Act**") (page 5 of the Action Plan).
44. The Action Plan also sets out that tackling noise and improving soundscapes contribute to achieving all 7 of the well-being goals specified in the WFG Act.
45. PPW further contains support for the 20mph default speed limit, and stresses that 'well-designed, people orientated streets are fundamental to creating sustainable places and increasing walking, cycling and use of public transport.' (4.1.19 PPW).
46. Locally, the Council's Well-being Objectives in relation to a 'more resilient and greener', 'more active and healthier' and a 'more equitable and connected' Vale all support the outcomes that the 20mph Order delivers.
47. Such a departure from the 20mph Order by way of an exception in relation to the St. Nicholas A48 area, which plainly fails the criteria of the Guidance, serves to also undermine the policy support on which the 20mph Order itself is predicated.

Conclusion

48. On any proper scrutiny of the Proposed TRO within the framework which an exception to the new default speed limit can be made, an exception in relation to the St Nicholas (A48) area is not appropriate or justified.
49. The Guidance is clear. The two pivotal tests to make an exception, which are supplemented by additional criteria in PPW, are not satisfied. St. Nicholas (A48) clearly comes under the place criteria on the basis of the proximity of the school, and access to the school, other demands and potential demands, as well as the number of residential

dwellings within the required proximity.

50. A 'robust and evidenced application of local factors' further fails to offer any support to the proposed exception.

51. Additionally, the Guidance requires that where there is a deviation from the 20mph default, highway authorities should have a 'clear and reasoned case' (paragraph 2.2.11). The Proposed TRO, with its justification for the exception based only on traffic volumes but without any elaboration or evidence cannot be considered a 'clear and reasoned case'.

52. Finally, policy support for the 20mph Order itself is such that exceptions to the default should be robustly justified or risk undermining the many policy reasons for its introduction as well as setting an inconsistent precedent.

53. Based on the above, if the Proposed TRO in respect of the St. Nicholas (A48) Area was made, the Council would fail in its duty to make 'evidence-based decisions on setting exceptions to the default speed limit of 20mph' and should therefore be refused.

Please confirm receipt and that this letter will be taken into consideration in relation to the consultation.

Yours sincerely,

Harrison Grant Ring

HARRISON GRANT RING

From: [REDACTED]
Sent: 18 July 2023 23:13
To: Contact OneVale <contactonevale@valeofglamorgan.gov.uk>
Subject: Consultation response, 30mph exceptions: attention of M Punter

Attention of Miles Punter

Dear Mr Punter,

I am writing to respond to the VoG consultation on its 20mph exception TROs. [REDACTED]

Reducing the speed limit from 30mph to 20mph is part of a broad raft of measures designed to reduce the carbon emissions of our transport system, to improve air quality and to enhance safety. The idea is to make roads safer for more vulnerable users, and to make streets better able to be used for purposes other than motoring.

The VoG Council, however, is proposing a set of exceptions which do not follow the WG guidance. Many of those proposed as exceptions fail should not be exceptions because the road is or could be used by pedestrians or cyclists who have no dedicated provision. If there are or could be cyclists, the road should be 20 - regardless of its width, the traffic speed etc. The reasons invoked by VoG for exceptions are, in several cases, not criteria mentioned in the WG guidance. Others fail to meet that guidance because they are of very short sections.

In other words, it is unclear whether the VoG Council, in proposing some of these TROs, has identified a statutory purpose. The VoG TRO notice states:

'The Order is necessary to maintain the existing speed limits of 30 mph on selected strategic roads within the County after the Welsh Government has passed legislation to implement a 20mph default speed limit in urban areas nationally throughout Wales in the interest of road safety (The Restricted Roads (20 mph Speed Limit) (Wales) Order 2022). The Council as Local Highway Authority considers that these roads are strategic routes with higher volumes of daily traffic compared to urban residential streets and as such do not meet the criteria or the nature of a road with a speed limit of 20 mph. The Council considers that the existing 30 mph speed limit is an appropriate speed limit in order to maintain a reasonable traffic flow on higher traffic volume strategic routes.'

This rationale, however, is not something in the Act or the WG 'Guidance on setting exceptions' - though the VoG Council may feel that it should have been.

More than this, it appears that the following WG 'Guidance' has been ignored:

'Question A: Are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?

- If the answer to A is 'no' then an exception for a 30mph speed limit may be appropriate.

Question B: If the answer to A is 'yes', are the pedestrians and cyclists mixing with motor traffic?

- If the answer to B is 'no' then a 30mph speed limit exception may be appropriate.
- If the answer to B is 'yes' then a 20mph speed limit will be appropriate unless the robust and evidenced application of local factors indicates otherwise.'

This seems to make clear that many of the exceptions proposed should not be.

Those TROs to which this consultation response refers are too numerous to mention, but include:

1. Pontypridd Road (T/23/127/MS) and Gladstone Road (T/23/130/MS), Barry
2. The triangle of roads south of Park Crescent, Barry (T/23/128/MS)
3. TRO T/23/129/MS (from Gladstone Bridge in the north, and along Ffordd y Mileniwm from Hood Road in the west to the Docks Office in the east, in Barry). Whilst there are segregated cycleways and pavements, large numbers cross the roads, and there is a school planned at the west.
4. The A48 in St Nicholas (T/23/120/MS).
5. The Merrie Harrier Junction (T/23/111/WS and T/23/109/WS).
6. The main roads through Dinas Powys (T/23/110/WS).

7. St Brides Major (T/23/102/MS) (no reason to not retain its 20 mph limit).
8. Ogmore by Sea (T/23/95/MS) and Southerndown (T/23/96/MS)
9. T/23/126/MS around Ewenny and Corntown.
- 10 Sully Area T/23/103/WS: many of the proposals are for distances that are under the 300m minimum.
11. Penarth Area T/23/109/WS, T/23/111/WS and T/23/133/MS
Including Cogan Hill, Cogan Hill Roundabout, Windsor Road, Marconi Avenue, Redlands Road
12. T/23/127/MS, T/23/128/MS, T/23/129/MS, T/23/130/MS & T/23/132/MS. Many of the roads in Barry are 'normal' not exceptional, as per WG criteria.
13. T/23/113/WS. It seems preposterous that anywhere in our around Swanbridge should be 30 mph:

Comments at the Scrutiny Committee today suggest that members are more concerned to have *more* 20mph streets than they are to retain 30mph streets. It would seem that the Vale Council's work might have been rooted in a mis-perception of sentiments on this issue.

██████████, which I believe will be making its own response to this consultation, is most concerned about the VoG's interpretation of WG guidance. I understand that it is considering mounting a legal challenge should these exceptions, these TROs, be confirmed.

Yours faithfully

██████████

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

17th July 2023

Director of Environment and Housing,
Vale of Glamorgan Council,
Alps Depot,
Wenvoe,
CF5 6AA.

Consultation on the proposed exceptions to the default 20mph speed limit within Vale of Glamorgan County Borough Council

Response from Llangan Community Council

Dear Director of Environment and Housing,

Llangan Community Council understands that the current 30 mph roads through the villages of Treoes, Llangan and St Mary Hill. will change to 20 mph limit and that the proposed 20 mph limit order will replace the current 30 mph limit not currently mandated by street lighting.

For each specific area, we submit the following observations.

Llangan Area, T/23/65/WS

We welcome these changes.

Additionally, we would propose extending the 20 mph Traffic Order along the un-named road through the centre of the village of Llangan, from the junction with Twchwch Garth eastwards to the junction with Cwrt Canna. The reason for this is to provide safety for pedestrians, runners, dog-walkers and cyclists and horse-riders who regularly use these lanes. We note that these users who wish to walk, cycle or ride, including pupils of Llangan school who wish to use active travel to get to school, are currently denied this opportunity because the road is narrow and unsafe. We believe this is an excellent opportunity to extend the speed limit now to create opportunities for people who wish to use active travel to safely commute to the school and further to Llangan and St. Mary Hill Village Hall. They are currently unable to do so. This proposal extends to drawing T/23/65/WS.

We also propose a second extension of the speed limit from Llangan and St Mary Hill Village Hall to the national speed limit at the end of Heol Lidiard. This would encourage safe driving past the entrance to the village hall and near Heol Lidiard.

Llangan Area T/23/66/WS

We welcome these changes.

Additionally, we would propose extending the 20 mph Traffic Order along the un-named road through the centre of the village of Llangan, from the junction with Twchwch Garth eastwards to the junction with Cwrt Canna. The reason for this is to provide safety for pedestrians, runners, dog-walkers and cyclists and horse-riders who regularly use these lanes. We note that these users who wish to walk, cycle or ride, including pupils of Llangan school who wish to use active travel to get to school, are currently denied this opportunity because the road is narrow and unsafe. We believe this is an excellent opportunity to extend the speed limit now to create opportunities for people who wish to use active travel to safely commute to the school and further to Llangan and St. Mary Hill Village Hall. They are currently unable to do so. This proposal extends to drawing T/23/65/WS.

We also note that the road from Ruthin to Pentre Meyrick is busy, and the traffic includes many lorries travelling along it, despite the road not being wide enough for them. Although the road currently includes 30 and 40 mph limits, traffic continues to speed, even past the school. We doubt that this will change when the limit is reduced to 20 mph in the proposed sections. We believe that further action to control the traffic will be required and would welcome further discussions about it.

Treoes Area, T/23/121/MS

We welcome these changes.

Additionally, we would propose extending the 20 mph Traffic Order along Pant Ruthin Fach Lane from Yr Efail, to the crossroads at Ty Candy Farm, westwards to Moor Mill Farm and then southwards from Moor Mill Farm to what will be the 20 mph limit at the entrance to Treoes near the bridge across Nant Canna. The reason for this is to provide safety for pedestrians, runners, dog-walkers and cyclists and horse-riders who regularly use these roads as a circular walk around the village. We note that there are entrances to houses and the fishing club along these lanes also. Extending the 20 mph limit to these lanes would remove the inequality in the improvement in safety for those householders and users which would arise if this were not done, and provide safe access for all users.

We also propose a second extension of the 20 mph limit along the unnamed road from The Star Inn to Ton Ty-Du. We suggest this order is extended southwards along the road, past the current allotments to the position of the current traffic sign which is situated about half-way along the road towards Greenfields. This is vital to warn to drivers of the need to drive slowly and carefully along the narrow lane as they approach the entrance to the village, where pedestrians are entering the allotments, the chapel and heritage hub, as well as cars turning into and out of the junction leading to Llangan.

Impact of Proposed Changes on other Rural Roads.

Lastly, we would like to understand the impact that these proposals will have on the volume of traffic travelling through the villages of Llangan, Treoes and St Mary Hill. Currently, the villages are used as "short-cuts" by commuters who are guided by their sat-navs. These devices do not take into consideration the actual conditions of the environment and the state of these roads, only the routes and speed limits. We are concerned that dropping the speed limit in some areas will result in drivers being routed along other, country lanes, thereby creating undesirable consequences of increased

traffic on narrow and unsuitable roads. We would like to see the modelling that has been done around this and understand the impact.

We are grateful for the opportunity to submit our responses to your consultation. We await your response to our proposals and the last request.

Yours faithfully,

A large black rectangular redaction box covering the signature of the representative.A smaller black rectangular redaction box covering the name of the representative.

On behalf of Llangan Community Council.

20mph Speed Limit Exceptions Consultation

Comments of Cllr [REDACTED] – St Nicholas and Llancarfan ward

As I stated at the briefing for elected members, there has been a lack of engagement and partnership with elected members and utilisation of local knowledge. This is evidenced in the TRO for Kingsland Lane, St Nicholas. There is no Kingsland Lane in St Nicholas. Further, St Nicholas CIW Primary School is located on two sites. The small school isn't a private nursery as suggested at the Environment and Regeneration scrutiny committee meeting, and if it was it would probably count towards requiring a 20mph speed limit. The distance between the primary school and Cowbridge Road (A48) is the distance from the nearest gate of the school directly to the road and this is 79m – physically measured with a trundle wheel in St Nicholas, rather than using GIS at a desk somewhere away from St Nicholas.

The inaccuracies in the TRO are disappointing and disadvantage members of the public wishing to participate in the consultation. Whilst the promotion of the consultation might have ticked boxes, the first and only notification on Facebook was on July 14.

One resident wrote:



[REDACTED]
Why has this only just been posted on the 14/7/23 when the consultation period started on the 22/6/23 and finishes in just a few days on the 19/7/23?

Like Reply 5 d





[REDACTED]
Also there are 70 pages of maps, in no particular order, as far as I can see, to go through to find the ones that you want to comment on

Like Reply 5 d Edited





The consultation was posted twice on Twitter.

Responses on July 17 included:



  · Jul 17 ...
Could you just provide a list of the exception roads please, the map is confusing?



  · Jul 17 ...
Where can i find the map with all the 20mph speed limits in the vale of glamorgan and around penarth

    89   Tip

  · Jul 17 ...
Thanks, but the map is very confusing for colour-blind people (approx 5% of population). If there isn't an accessible version, is there a list of affected roads?

The Tweet of the consultation on July 13 resulted in the following comments

  · Jul 13 ...
Map shows exceptions to 20mph limit on St Nicholas Road and Broad st in Barry - two roads with enormous problems with speeding traffic, pedestrian crossings ignored, etc
1) no reference for these roads in docs, so can't respond?
2) no rationale for excentions?

  · Jul 13 ...
One week to comment!! I've been watching out for this consultation and not seen it til today.

Whilst there was a news item with a link to the consultation at the bottom of the home page of the website, this wasn't very clear and few people will go to the council website to get their council news.

Neither myself nor my wards' Community Councils promoted the consultation – the social media posts appeared too late to share.

Clear reasoning for the proposed exemptions and supporting evidence for exemptions was not given to members of the public. This made their task on contributing to the consultation in a meaningful way very difficult.

I am surprised that the injury collisions that have been recorded by the police at the junction of Station Road and Cardiff Road in Dinas Powys have not been considered when looking at roads for exemption. I'm also surprised that Cardiff Road is proposed for exemption outside Eastbrook and Dinas Powys Railway Stations – when the Vale Council should be promoting walking and cycling to the railway stations.

The road through Ystradowen is exempted. Is there no possibility that children might cycle to meet their friends within the village should the speed limit be defaulted to a safe speed?

St Nicholas does meet the place criteria set by the Welsh Government guidance due to the proximity and access to the school. Further, Planning Policy Wales 11 suggests that other key buildings within the village also contribute to the Place Criteria. The footways within St Nicholas are narrow, offering little protection for people walking through the village. The footways are busy with people walking their dogs, accessing the school, visiting friends and rambling the many public rights of way that link the historic church and graveyard with Tinkinswood, Duffryn Gardens, other villages and offer great views for wellbeing and good exercise for health.

So, in relation to St Nicholas:

Question A: Are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?

YES. The A48 is a well-known route for cycling clubs and increasingly brave day-trippers and tourists. We even have some equestrians. Residents of Cae Newydd and Campbell Court must walk the narrow footway to reach the bus stops and Village Green. In reverse, residents of the older parts of St Nicholas must walk the narrow footways to reach the equipped play area at Cae Newydd. The footways of St Nicholas are already well used despite the proximity of the busy road and noise pollution.

Question B: If the answer to A is 'yes', are the pedestrians and cyclists mixing with motor traffic?

YES. There are only narrow footways and just one crossing. A lack of a controlled crossing is of particular concern by Chapel Lane, Trehill, by School Lane and by Cae Newydd (a popular footpath is across the road). Duffryn Lane provides a relatively safe cycling route – once residents reach it. Cycling Clubs use the A48 for training.

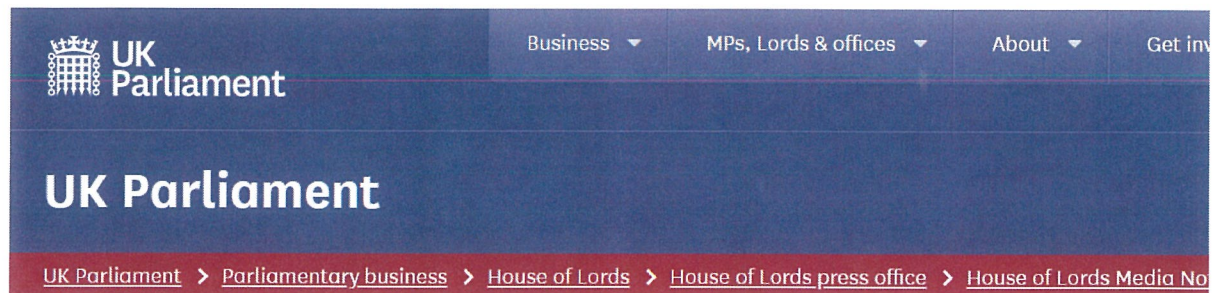
The Welsh Government guidance states:

If the answer to B is 'yes' then a 20mph speed limit will be appropriate unless the robust and evidenced application of local factors indicates otherwise.

The proximity of the school, Station House Health & Wellbeing, church and chapel, plus the number of dwellings, including the historic Blacksmiths Row and Church Hall House firmly put St Nicholas as necessitating a 20mph speed limit.

Transport for Wales and the Highway Authority haven't identified St Nicholas Church in Wales Primary School correctly and therefore cannot claim to have robustly evidenced local factors that might exempt Cowbridge Road.

St Nicholas was identified in the Welsh Governments Noise and soundscape action plan a decade ago for 'Priority Action' to reduce road noise pollution. The pollution is now worse due to the new A4226 bringing more traffic through the village – particularly large vehicles.



Light and noise pollution remain neglected pollutants despite significant health impacts, Lords report warns

Wednesday 19 July 2023

Environmental noise and light remain neglected pollutants, poorly understood and poorly regulated, a House of Lords report has warned. This is despite their negative impacts on human health, which can lead to premature death. Research from the UK Health Security Agency shows that 40 per cent of the population are exposed to harmful levels of road traffic noise and suggests the equivalent of 130,000 healthy life years are lost from noise pollution each year in Britain.

Noise and light pollution also have a significant impact on the economy: sleep disturbance is estimated to cost the UK economy £34 billion a year, according to RAND Europe, and noise and light pollution are contributing factors.

The [House of Lords Science and Technology Committee](#) has today, **Wednesday 19 July**, published its report, *The neglected pollutants: the effects of artificial light and noise on human health*, examining the effects of artificial light and noise on human health.

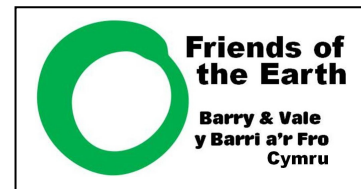
Lower traffic speeds reduce noise pollution.

Much more detailed reason for not exempting St Nicholas from the 20mph rollout are provided in the response to this consultation submitted on behalf of St Nicholas with Bonvilston Community Council.

I am aware that residents of Bonvilston, Llancafán, Llantrithyd, Llanbethery, The Drope and St Georges are keen to have their speed limits reviewed.

FoE response to the
Consultation on Traffic Orders.

The exceptions to the national 20mph default have not been justified and should be dropped



FoE have objected that this website statement is misleading and untruthful

We have identified a number of 20mph 'exception roads' in the Vale of Glamorgan in line with the [Welsh Government exceptions criteria](#).

Mr Clogg admitted at 18th July Scrutiny that this is "inaccurate" and could mislead the public, offering an apology "to that extent".

We cited the proposals for 30mph "buffer zones" as transition from 40mph; these do not "simplify signing" as stated, but make it more complicated, confusing and costly. WGovt guidance (2.2.20-21) says these zones should be 300 metres minimum in length, but we see several of these exceptions are about 100metres or shorter.

Mr Clogg denied this, saying he's "confident" none are below the 300metre standard. In the Annex, we reproduce the details for the nine 30-mph buffers at the Merrie Harrier, Hayes Rd roundabout (Sully) and Swanbridge crossroad. All nine are below the 300metre standard. We see likewise three in Ewenny and three in Fonmon (Annex).

Mr Clogg gave the Committee false information, as he did for the public. All the buffer 'exceptions' listed in the ANNEX below should be withdrawn.

The buffer 'exceptions' proposed at the Merrie Harrier turns to Llandough and Penarth have no rationale, as most of the motor traffic is slowed or stopped by the Traffic lights. Turning traffic is slowed and has to accelerate uphill to reach 30mph. To then reduce to 20mph after 60 or 100 metres is wasteful and polluting. Coming into the junction, nearly all traffic has to stop at the traffic lights, so speeding up to 30mph into the lights is pointless and risky to cyclists trying to reach the ASL Box ahead of the queue.

30mph traffic is similarly hazardous to cyclists down Harbour Rd hill, as they have to reach the centre lane to proceed to the Knap or to the segregated cycleway on the Causeway. Cars filtering left along the Causeway tend to cut-up cyclists. It's a bad design - they could have built a segregated lane down the centre of this wide road – so now it's there, let's exclude the 30mph exception.

Systematic consideration of the key two-stage test in the WG guidance was needed in deriving the TROs:

Question A: Are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road?

If the answer to A is 'no' then an exception for a 30mph speed limit may be appropriate.

Question B: If the answer to A is 'yes', are the pedestrians and cyclists mixing with motor traffic?

If the answer to B is 'no' then a 30mph speed limit exception may be appropriate.

If the answer to B is 'yes' then a 20mph speed limit will be appropriate unless the robust and evidenced application of local factors indicates otherwise.

Mr Clogg waffled over the interpretation of "significant" and did not show they had made a "robust and evidenced application of local factors". Though safety measured by local accident rates is a key objective, he showed they had not taken safety into account, in denying the accident rate at the Dinas Powys Station Road junction was relevant (to Cllr [REDACTED] question).

Little regard to Place criteria (2.2.28)

1. Within a 100m walk of any educational setting (e.g. primary, secondary, further education and higher education)
2. Within 100m walk of any community centre
3. Within 100m walk of any hospital
4. Where the number of residential and/or retail premises fronting a road exceeds 20 properties per km.

2.2.9 Sections of road which meet any of these Place criteria should be considered to positively answer principal question A as set out above

No data relating to the above criteria have been compiled.

When talking of Jenner Rd, Mr Clogg said they'd thought of the number of schoolchildren, but not the 100m distance exclusion from each school or the number of properties fronting the road, which far exceeds 20 /km.

They haven't considered Lavernock Rd being within 100m of Brockhill Community Centre and Cosmeston Park (which should come in that category). They haven't considered the nurse school (SureStart Centre) on Gladstone Rd; the YMCA community centre close to Gladstone Rd or the Palmerston Adult Education Centre on Cardiff Road.

Windsor Rd Cogan, has Cogan Leisure Centre (in the Community Centre category) within 100m and many more than 20/km residential premises fronting the road.

In the discussion of St Nicholas Rd/Park Avenue at the Committee, Mr Clogg never mentioned that many more properties than 20/km front onto the roads. His proposal to exempt these roads was based on a "feeling" and "belief" on whether the number of users is "significant".

Pontypridd Road B4266 cannot have an 'exception' because the number of homes per km well exceeds 20 on both sides and its cycle-route has no segregation.

Gladstone Rd has sparse premises fronting it below the Court Rd junction; however, the YMCA "community centre" is off it, with Court Rd entrance less than the 100metre criterion. There are no defined crossings for the two bus stops. A cycle-route crosses it. The section between Court Rd and Tynewydd Road is excluded by the SureStart nursery school and houses fronting it at over 20 /km both sides. The Court Rd junction has the Court Rd and Gladstone Rd cycleways through it where cyclists seriously "mix with traffic". Likewise pedestrians crossing the limbs of the roundabout. Thus the 'Place' criteria exclude the 'exception' for Gladstone Rd.

Along Cardiff Road to Palmerston Road, there's 20 homes etc per km including Churchill Terrace, then on the Lennox Green to Laura St. section. Palmerston Adult Ed Centre is here too. The bus stop has no associated crossover; pedestrians and cyclists mix with the traffic at the Palmerston Rd lights. The lack of defined crossing points on this section for reaching the shop and homes breaches the criterion on no mixing with 2-way traffic. The section east of Laura Street has few premises fronting but many behind (Ty Verlon complex). There's no crossing point for the Bus stop near McDonalds. The council plans an off-road cycleway on the Cardiff Road, so evidently considers the current or future demand for this is "significant". It's currently an on-road 'future' cycleway - once an off-road segregated cycleway is built, the question of the speed limit can be revisited. Cyclists at present have to mix with traffic at the major Biglis (McDonalds) roundabout, then to and from Dinas Powys.

Gladstone Bridge has deficient connections for cyclists at both ends (roundabouts), breaching the requirement that pedestrian and cyclists do no mix with motor traffic.

Millenium Way from Gladstone Bridge to the Docks Office: has homes fronting the road at over 20 per km. It also serves the Bridge Between community centre and the Waterfront Medical Centre. These local factors prevent it having an exemption. Millenium Way to Hood Road comes within 100m of the Sant Baruc primary school – with schoolchildren walking to the eat Waterfront homes. It cannot have an exemption.

The VoG has no supporting evidence

FoE asked for supporting evidence 2 weeks ago, but Mr Clogg offered none. We see from the Scrutiny discussion that he and his colleagues came to their “belief” without compiling any evidence. They failed to make *the robust and evidenced application of local factors* that the guidance requires in key Question B. We consider this proves the website statement was not just inaccurate but false. Mr Clogg had no body of evidence to give the support that is essential under Question B for the ‘exemptions’ proposed in Barry, Sully Dinas Powys, Penarth and Llandough, perhaps not elsewhere.

No account of cycling routes

Mr Clogg denied at Scrutiny there are any relevant “designated” cycle-routes so he’s not taken them into account. He’s wrong.

The Active Travel Network Maps (ATNM) is statutory combining the Existing Routes Map and the Integrated Network Map required by the Act. This combination of **existing routes** and **future routes** is to be reviewed every 3 years (ATNM s. 10.1.1). These routes must connect to destinations and could be on road, shared, separated, or motor-traffic free. Routes can be for walkers or cyclists, or both. Maps are also to show crossing points.

The Vale cycle-routes are very largely “future” in the sense that they need improving to bring them up to standards. They are of course already used for cycling, with many being defined and provided with Advanced Stop Lines under previous programmes.

The “Future routes” are fully included in the integrated network (ATNM s.10.8), so Mr Clogg was wrong to deny they exist and ignore them in the TRO process.

The presence of an Active Travel route: answers ‘yes’ to Question A

In defining and confirming a route, the responsible officers decided there **are** significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road. Mr Clogg’s team were out-of-order to reach a decision on a feeling or belief on ‘significant’ numbers. All the exceptions at issue in Barry and the east Vale are on Active Travel network routes.

An ‘exception’ depends on the answer to Question B being – ‘no’

- I.e. that people on foot and cycle are not required to mix with motor traffic (s.2.2.18)

2.2.19 says: This would require protected facilities to be provided for pedestrians and cyclists which meet the ATAG**, in particular:

- there are footways in accordance with Section 9.6 of the ATAG on the side(s) of the road fronted by development or to provide necessary connectivity [1].
- any demand for pedestrian and cycle crossing movements mainly takes place at defined locations, which are provided with facilities in accordance with Section 12.3 of the ATAG; or alternatively there is no requirement for people on foot or cycle to cross the road (e.g. development is only on one side) [2].
- cycle provision along the route is ‘suitable for most people’, based on Table 11.1 of the ATAG. This will usually require physical protection from motor traffic [3]

** ATAG = Active Travel Act Guidance, which Mr Clogg should know well

[1] clear unobstructed width of 2.0m (desirable minimum), which allows two wheelchair users to pass one other. Where physical constraints make this impossible a clear width of 1.5m (absolute minimum)

[2] mainly takes place at defined locations, which are provided with facilities in accordance with Section 12.3 of the ATAG

[3] Protected space for cycling (including light segregation, stepped cycle track, or kerbed cycle track)

The exceptions proposed in the East Vale - through much of Dinas Powys, down Cogan Hill through Cogan, and along Lavernock Rd to Cosmeston - breach the WGovt *Exceptions Criteria* in two clear ways:

- **designated cycling routes;** all are on-road with no segregation. Most lack even lines on the roadway, except approaching traffic lights. Where cyclists have to move out for turning right, there's no marking or segregation.
- **substandard footways.** The standard width is 2 metres. In an extreme, 1.5 metres for short stretches if unobstructed. Cogan Hill fails, being over narrow with a railing; there's no crossing from Penarth Haven to Cogan Station, the pavement to the Cogan bus-stop has a 1 metre pinch point. Lavernock Rd likewise has a stretch of over-narrow pavement just before the Schooner inn, on route to Cosmeston park and the housing estate.

Windsor Road has a "future" cycling route and an "existing" pedestrian route showed on-road as far as Cogan Station access above the bottom of Cogan Hill, then a "future" walk/cycle route through Cogan roundabout and up to Barons Court junction. Clearly the existing walking route uses the pavement through Cogan. The "future" seems to use the pavement on the west side of Cogan Hill, but could use that on the east side, as pedestrians do to the few homes and businesses and for turning into Marconi Ave.

The Redlands Rd 'future' route through to Llandough is also incompletely defined, starting on the west pavement up Penlan Rd but drifting into the roadway, while on Redlands Rd starting on the east pavement then drifting into the road. Cyclists currently (have to) go through the traffic lights where there are advanced stop-lines for them. The cycle-route clearly mixes with traffic. The 2-metre pavements (narrows to half that at the house 138 Andrew Rd) do not accommodate sharing the footway. The ASLs show the current cycle-route is on-road (as also on Cogan Hill).

The **Highways Dept. surely did not survey** the pavements or look at the Council's "**Active Travel**" network, or they could not in honesty have claimed

..... in line with the [Welsh Government exceptions criteria](#)

CONCLUSION

FoE already asked the Council's Monitoring officer to withdraw the proposed 'Exceptions' for Penarth, Llandough, Dinas Powys and Sully because the website statement is wrong and misleads the public. We've given evidence above that those Exceptions and numerous others do not comply with the WGovt criteria. Their purpose is not stated and the required evidence for robust decision-making does not exist. Some are claimed as 30mph 'buffers' between 40 and 20mph. but mostly do not comply with the minimum length (listed in the ANNEX), so have to be dropped. The proposals have wrongly ignored the designated Active Travel cycle-routes.

The proposals are costly to implement, they add to street clutter and confusion for drivers. Though Mr Clogg's team has been driving ahead to erect the signs prior to consultation and approval, the Council should limit its losses and drop the proposed exceptions (as long as dropping any does not adversely affect safety). In accordance with Welsh Govt reasons, we believe the 20mph change indeed will have a positive effect on safety.

ANNEX Proposed Buffer/transition Exceptions below the 300m limit.

Merrie Harrier junction

Llandough (near Penarth) Area Refer to drawings: T/23/108/ and T/23/111/WS

Leckwith Road (B4267) (part), Llandough From the boundary line of the properties Tree Tops and Innisfree in a north-westerly direction for a distance of approximately **254 metres**

Penlan Road (B4267) (part), Llandough From the centre point of its junction with Barry Road, north-eastwards for a distance of approximately **110 metres**.

Redlands Road (B4267) (part), Penarth From the centre point of its junction with Eastbrook Road, south-eastwards for a distance of approximately **127 metres**

Sully Area Refer to drawing: T/23/103/WS

Hayes Road Roundabout, Sully Will be subject to a 30mph speed limit for its entire length, a distance of approximately **85 metres**.

Sully Moors Road (part), Sully From the centre point of its junction with Hayes Road Roundabout, north-westwards for a distance of approximately **95 metres** and contiguous with existing 40mph speed limit.

Hayes Road (part), Sully From the centre point of its junction with Hayes Road Roundabout, south-westwards for a distance of approximately **44 metres** and contiguous with existing 40mph speed limit.

South Road (part), Sully From the centre point of its junction with Hayes Road Roundabout, eastwards for a distance of approximately **88 metres**. From the centre point of its junction with Beach Road, westwards for a distance of approximately **285 metres**.

Swanbridge/Beach Rd junction

Lavernock Road (part), Sully From the centre point of its junction with Beach Road, eastwards for a distance of approximately **138 metres** and contiguous with existing 40mph speed limit.

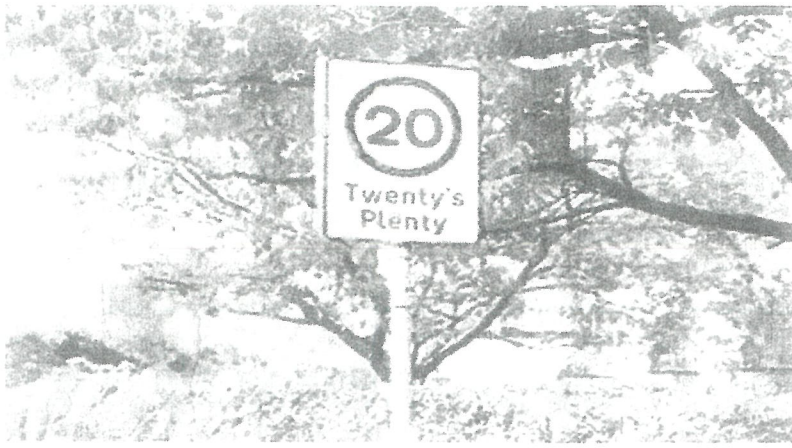
Sully Road (part), Sully From a point approximately 10 metres northeast of the centre point of its junction with Cog Road, north-eastwards for a distance of approximately **150 metres** and contiguous with existing National speed limit.

Ewenny: T/23/86/MS and T/23/126/MS B4524

Ogmore Rd from St Brides Road, westwards for 254 metres; St Brides Rd north for 45 metres; Corntown Rd from the B4224 junction, south easterly for 73 metres.

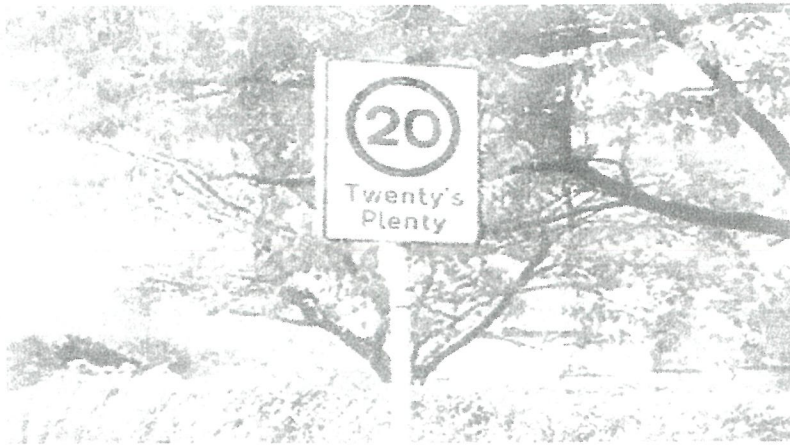
Fonmon: T/23/98/MS Fonmon Rd / Port Rd junction, southwards 280m; Port Rd (from junction westwards 50metres and eastwards 20 metres.





Say No to 30mph on St Nicholas & Park ~~crescent!~~ AVENUE.

We call on the Vale of Glamorgan Council to apply 20mph default speed limit to St Nicholas Road and the adjoining Park Avenue, Harbour Road and Broad Street... for the sake of our children and the environment!



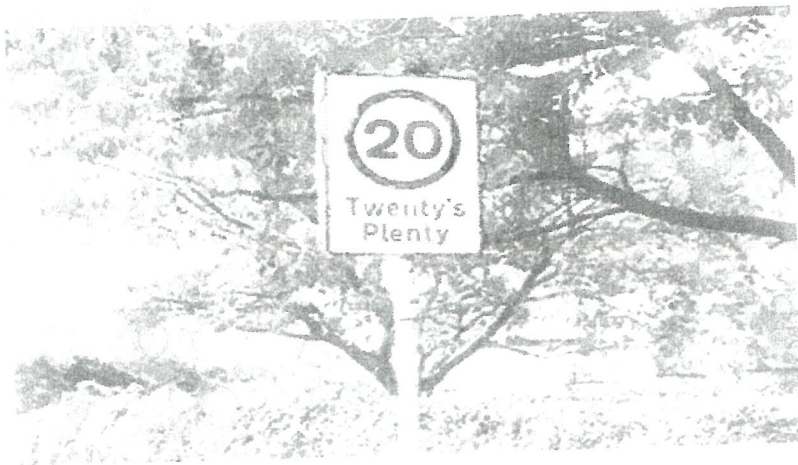
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Name

Address

Signature



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Signature

PL

PL

PL



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Name

Address

Signature

1

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/65/WS	103	No	<p>Our understanding is that the current 30 mph roads through the villages will change to 20 mph limit. The proposed 20 mph limit order will replace the current 30 mph limit not currently mandated by street lighting. Llangan Area, T/23/65/WS We welcome these changes. Additionally, we would propose extending the 20 mph Traffic Order along the un-named road through the centre of the village of Llangan, from the junction with Twchwch Garth eastwards to the junction with Cwrt Canna. The reason for this is to provide safety for pedestrians, runners, dog-walkers and cyclists and horse-riders who regularly use these lanes. We note that these users who wish to walk, cycle or ride, including pupils of Llangan school who wish to use active travel to get to school, are currently denied this opportunity because the road is narrow and unsafe. We believe this is an excellent opportunity to extend the speed limit now to create opportunities for people who wish to use active travel to safely commute to the school and further to Llangan and St. Mary Hill Village Hall. They are currently unable to do so. This proposal extends to drawing T/23/65/WS. We also propose a second extension of the speed limit from Llangan and St Mary Hill Village Hall to the national speed limit at the end of Heol Lidiard. This would encourage safe driving past the entrance to the village hall and near Heol Lidiard. Impact of Proposed Changes on other Rural Roads. Lastly, we would like to understand the impact that these proposals will have on the volume of traffic travelling through the villages of Llangan, Treoes and St Mary Hill. Currently, the villages are used as “short-cuts” by commuters who are guided by their sat navs. These devices do not take into consideration the actual conditions of the environment and the state of these roads, only the routes and speed limits. We are concerned that dropping the speed limit in some areas will result in drivers being routed along other, country lanes, thereby creating undesirable consequences of increased traffic on narrow and unsuitable roads. We would like to see the modelling that has been done around this and understand the impact.</p>	24
T/23/66/WS	104	No	<p>Our understanding is that the current 30 mph roads through the villages will change to 20 mph limit. The proposed 20 mph limit order will replace the current 30 mph limit not currently mandated by street lighting. Llangan Area, T/23/65/WS We welcome these changes. Additionally, we would propose extending the 20 mph Traffic Order along the un-named road through the centre of the village of Llangan, from the junction with Twchwch Garth eastwards to the junction with Cwrt Canna. The reason for this is to provide safety for pedestrians, runners, dog-walkers and cyclists and horse-riders who regularly use these lanes. We note that these users who wish to walk, cycle or ride, including pupils of Llangan school who wish to use active travel to get to school, are currently denied this opportunity because the road is narrow and unsafe. We believe this is an excellent opportunity to extend the speed limit now to create opportunities for people who wish to</p>	25

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/66/WS	104 (Cont)		use active travel to safely commute to the school and further to Llangan and St. Mary Hill Village Hall. They are currently unable to do so. This proposal extends to drawing T/23/65/WS. We also propose a second extension of the speed limit from Llangan and St Mary Hill Village Hall to the national speed limit at the end of Heol Lidiard. This would encourage safe driving past the entrance to the village hall and near Heol Lidiard. Impact of Proposed Changes on other Rural Roads. Lastly, we would like to understand the impact that these proposals will have on the volume of traffic travelling through the villages of Llangan, Treoes and St Mary Hill. Currently, the villages are used as "short-cuts" by commuters who are guided by their sat navs. These devices do not take into consideration the actual conditions of the environment and the state of these roads, only the routes and speed limits. We are concerned that dropping the speed limit in some areas will result in drivers being routed along other, country lanes, thereby creating undesirable consequences of increased traffic on narrow and unsuitable roads. We would like to see the modelling that has been done around this and understand the impact.	
T/23/67/WS	172	No	The Colwinston Community Council have reviewed the areas as marked on the maps and would like to comment on the siting of the change of the change of speed from the national speed limit. At present the 30mph limit stops just after an area locally known as the Old Ford Area. This is an area that the Community Council is currently transforming with the local residents into a community space involving a medieval well, an ancient clapper bridge and woodland. As a result the volume of pedestrian traffic around this area is dramatically increasing and the safety of visitors would greatly increase from the limit being brought in before the area rather than after it. The boundary of the current limit is after the brook crosses the road. Where the brook crosses the road is where the majority of the pedestrians will be crossing the road to bridge, woodland and well. If you look at the area you will see that the road cuts through the area and has historic sites, benches and woodland on both sides of the road, thereby encouraging people to cross the road. On travelling towards the village vehicles will currently approach the area at the national speed limit through a corner that blocks their view of the road in the distance until they are round it and then are on top of the old ford area. This corner adds to the danger particularly at the higher speed.	26
T/23/72/WS	152	No	Would it be possible to extend the 20mph limit along castle road to begin before Fonmon Castle gates so that villagers can walk safely along roads to footpaths and woods. Port Road to the highwayman should also be 20mph for nurston residents. Can the 20mph also begin at the B4265? Thank you	27

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/95/MS	158	Yes	Introduction of 20mph limit is a farce To start the limit at the point indicated (near Crompton Way) means signs which are intrusive and detrimental to the value of the surrounding properties. I strongly object. Solutions would be Keep Main rd as 30mph throughout Start the 20mph limit before Craig yr Eos Road junction I have no faith in your ability or your so called consultation. Absolutely disgusted, you've undoubtedly lost my vote and support!,,	28
IF 967 (No Ref No.) T/23/96/MS	102	No	I have noted of late the placement of new road signage (assuming that these are related to the implementation of the new 20mph speed limit safety scheme to come into force in September 2023?) Firstly, the placement of the signs situated as a pair and fronting access to the eastern access to West Farm Rd and the B4524. These signs front access to an un-adopted highway and is in the ownership (as I understand it) of The Dutchy of Lancaster the section running the majority of the un adopted gravel track road (from the adopted highway of West Farm Rd to the cattle grid, and from that point to the B4524, in the ownership of Dunraven Estates. We as residents have easement in place to access our respective properties along this track. If the signs put in place suggest a speed limit of up to 20mph, the gravel track is, in my opinion, not suitable for this. Furthermore, does this present an element of litigation from a road user perspective on the Local Authority (LA) to endorse the use of this arguably poorly maintained and un-adopted roadway?...or is the risk of litigation passed to residents (we have a loose agreement to repair and maintain to a limited level) or landlords of these respective sections? In addition to this, it may put more pressure on safety to residents and the general public using this as a PROW (assuming it is) for walkers and cyclists (no pavements or drainage) and increase the the degradation of the gravel highway. I'd be grateful to get your thoughts on this and convey this by way of consultation to the residents in the immediate area. David, 48, West farm Rd Ogmoredy by Sea CF32 0PU	29
IF 967 (No Ref No.) T/23/100/MS	87	Yes	Whilst most would support 20mph outside hospitals, schools and other public buildings, everywhere else just seems to form part of a national anti private car policy by the Welsh Assembly	30
T/23/103/WS	6	Yes	The drawing is far from clear what the situation will be as regards 20mph for the majority of Sully as apart from the green & red coloured roads the rest are blank! and do not contain any key at all !!! Are you proposing that all of the road between Sully & Cosmeston will be 20mph, which would be ludicrous. I suggest you reissue the information so that it is able to be easily understood, otherwise this "consultation" is yet another tick box rather than a meaningful exercise. I do not consider any of the proposal to be workable or enforceable in practical terms and will not bring any change in motorists behaviour is yet another degradation of ability to travel. It is a policy that has little support	31

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/103/WS	6 (Cont)		with Wales and once again we are being dictated to by a Government that has no mandate from the electorate to carry out this policy	
T/23/103/WS (Sully)	65	Yes	I object to the proposed 30mph Speed Limit Order at the roundabout between Sully Moor Rd, Sully Road and Hayes Road. I strongly believe beneficial to have a 20mph limit there, and rather move the 30mph buffer zone further before the roundabout in Sully Moor Rd and Hayes Road. This would be more effective in reducing the speed of cars entering the village and make the red-marked pedestrian crossing at that western end of South Road more safe (I, my family and many other local people use to reach the bus stop and the fields/footpath to the beach).	31
T/23/103/WS	129	Yes	I am very surprised that there are exceptions to 20mph that have been proposed by Vale of Glamorgan Council on two sections of South Road in Sully, at each end of the village. One of these is a long section of South Road as it enters the village from Penarth and as far as the road entrance to Sully Sports & Social Club. There are multiple features that make this section entirely unsuitable for an exception. Indeed, there is a strong argument for reducing the speed limit to 30 mph some way further in advance (than currently the case) of entry to the village where the speed should then drop to 20mph. This reduction from 40mph to 30mph would be further eastwards on the B4267 Lavernock Road, allowing the speed to drop from 30mph to 20mph prior on Lavernock Road and prior to entry to the village and the road's continuation as South Road and its crossing of road. Indeed, this exception at the eastern entry to Sully has been placed in a particularly intimidating section of Laverock Road and South Road for pedestrians, cyclists and other vulnerable road users. It is a known trouble spot for speeding which requires specific attention although GoSafe refuse to enforce in this section for some for some technical reason. By contrast, South Wales Police conducted a very busy (and productive) enforcement effort in this section some months ago. Indeed, I witnessed a large proportion of vehicles being stopped for speeding as they passed the zebra crossing adjacent to the Library and the entrance to Sully Sports & Social Club. Amongst other things, this eastern section of South Road includes two bus stops (with no allied pedestrian crossing facility), a nextbike docking station, a dedicated pedestrian entrance to Sully Sports & Social Club (also with no allied pedestrian crossing facility) and other relevant features and use. I understand that as part of the Cog Housing Scheme there are also plans for an active travel route along Swanbridge Road from the development to its junction with South Road and Beach Road. You may also know that Beach Road is also a popular walking and cycling route to Swanbridge, with its various attractions and facilities. There is no protected walking area or pavement for walkers navigating Beach Road. Of course, you attractions and facilities. There is no protected walking area or pavement for walkers navigating Beach Road. Of course, you will also know that this is the section of South Road where you are planning the beginning of a new a	31

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/103/WS	129 (Cont)		<p>active travel route (Sully to Cosmeston Active Travel Route). At the western end of South Road, there is an exception from before the roundabout on both Sully Moors Road and Hayes Road. This is somewhat illogical as there is a steep and curved climb into the village after the roundabout as vehicles exit the roundabout towards South Road. As it is, the vast majority of motor vehicles drive at around or below 20mph as they exit this roundabout towards South Road. Under the exception, motor vehicles will be encouraged to accelerate immediately prior to entering the village and then very shortly afterwards signed to slow to 20mph before South Road's junction with Cog Road, already an extremely intimidating junction for pedestrians, cyclists and other vulnerable road users. This is illogical, confusing and dangerous for pedestrians, cyclists and other vulnerable road users. It should also be noted that this is close to Beechwood College where there are many vulnerable students and staff who regularly walk along and cross this section of South Road. I should add that in its statement of reasons covering the VoG TRO covering exceptions to the national 20mph limit, it states:</p> <p>Statement of Reasons The Order is necessary to maintain the existing speed limits of 30 mph on selected strategic roads within the County after the Welsh Government has passed legislation to implement a 20mph default speed limit in urban areas nationally throughout Wales in the interest of road safety (The Restricted Roads (20 mph Speed Limit) (Wales) Order 2022). The Council as Local Highway Authority considers that these roads are strategic routes with higher volumes of daily traffic compared to urban residential streets and as such do not meet the criteria or the nature of a road with a speed limit of 20 mph. The Council considers that the existing 30 mph speed limit is an appropriate speed limit in order to maintain a reasonable traffic flow on higher traffic volume strategic routes. This takes no account of the Government Guidelines which clearly require a reasoned case for setting a limit 50% higher than the national norm. The fact that the Council "considers a 30mph limit is appropriate" is neither "a robust and evidenced application of local factors" as required in the guidance or indeed a "clear and reasoned case" for deviating from the guidance. Regardless of any individual case, the Statement of Reasons for the TRO is insufficient. Hence I am concerned that the TRO is flawed to the extent that it would be irresponsible for members to make such a TRO on on such flimsy grounds.</p> <p>Many wide roads which are easy to go 30mph will now be dominated by 20mph and people will be looking down at their speedometer. People won't listen to 20mph anyways. Do something good for people in Vale make roads 30mph on main roads</p>	
T/23/103/WS	165	Yes	<p>Cyclists sharing road with motorised vehicles going too fast. When I commute this way I am consistently subject to close passes coming off the roundabout from Hayes Rd onto South Rd, the road has a slight kink, cars don't allow for this and cut in (towards a cyclist) too soon. It is a high risk area for active travel users. The</p>	31

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/103/WS	165 (Cont)		answer to the principal questions in the WG guidance documents is yes for both A and B for this section of road. Each section of road in the traffic orders document is also shorter than the 300 metres WG minimum guidance.	
T/23/103/WS	166	Yes	South Road (part), Sully From junction with Beach Road, westwards for approximately 285 metres The answer to the principal questions in the WG guidance documents is yes for both A and B for this section road, on road cycle route without dedicated provision and the potential for a lot more cyclists if the speeds were lower. The distance of approximately 205 metres is also shorter than the 300 metres WG minimum guidance. The not fit for purpose share cycle route starts after the junction with Swanbridge Rd and there is no priority for cyclists or pedestrians at that junction Therefore any exception should not start prior to that junction.	31
No Ref (T/23/105/WS)	18	Yes	Ystradowen- I disagree with the proposal to make the village of Ystradowen an exception to the 20mph proposal. The village has a number of school age pupils who catch buses to Cowbridge High and Ysgol Bro Morgannwg. The beer garden at the front of The White Lion is often teeming with families and young children. 20mph is vital for kids' safety As noted, we should be implementing the same speed limit as Aberthin- especially given that our village is significantly larger with regards to population and the number of residents under the age of 18. The school bus crash of the early 2000s is still seared in the memory of Ystradowen's long-standing residents. Act now or repent!	32
(T/23/105/WS)	19	Yes	This road already sees multiple vehicles speed through the village. Only being slowed down when we have the speed camera vans here. The village now has a large population of children, all of whom have to cross this busy street either to catch buses to school. Or to use the astro and parks in the village. Aberthin got a 20mph limit for a pub, but we won't get one for the safety of our children?	32
IF967 (T/23/105/WS)	20	Yes	I am absolutely shocked that you are considering applying an exemption to the 20mph speed limit on the A4222 that runs through our village, ystradowen. The speed that vehicles come through our village is outrageous and is very very dangerous for the school children that wait on that road or walk along it to go to the garage. If you let that road remain a 30mph people will just continue to put their foot down when coming off the 60mph as they do know. There is no reason at all that we should be treated any differently to Aberthin. At least if it was 20mph people might slow down to something closer to 30mph! The lay-by by the bus stop is a police speed camera spot so this proves that it is a problem area. My husband also took part in a speed watch scheme last year and was shocked to record some	32

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
IF967 (T/23/105/WS)	20 (Cont)		vehicles at 60mph! Please reconsider your decision on this and make ystradowen a 20mph road along with other villages in the vale. We are a large village with lots of young families with children, please protect us from speeding vehicles.	
(T/23/105/WS)	21	Yes	The road through Ystradowen is sandwiched between National speed limit and 40 mph, there are 2 bus stops and narrow pavements regularly used by school children with a lot of heavy traffic. A high proportion of traffic regularly exceed existing speed limit so it definitely needs to be a 20 mph zone	32
(T/23/105/WS)	22	Yes	Ystradowen should be 20mph!!! People Drive through at a speed currently that would easily Kill a child, of which there are many walking around!	32
(T/23/105/WS)	23	Yes	The current 30mph is ignored by so many drivers. Cars and lorries drive too fast through the village. I stand at the bus stop with my children daily and observe cars driving far too fast. They overtake the buses and ignore the fact that children are walking on pavements alongside this busy road. I also walk my dog along the pavement along with so how are children expected to utilise the amenities at the village hall and football pitch if they cannot walk there safely There are no measures in place at the moment to slow this traffic and I fear that it is only a matter of time before a a tragedy occurs	32
(T/23/105/WS)	24	Yes	The road through Ystradowen has 2 bus stops used daily by school children and narrow pavements yet the majority of people currently drive through the village at over 40 / 50 mph. Please consider reducing this section to 20 mph in the interests of keeping our village safe	32
No Reference (T/23/105/WS)	25	Yes	Should be made as 20mph on main road due to risks to children. I have seen children almost being hit by oncoming traffic whilst crossing over.	32
(T/23/105/WS)	26	Yes	People drive at excessive speed throughout the village. There are many children that board/exit School transport, as well as many children travelling the pavements to access the village amenities. The risk of an accident is significant due to the excessive speeds people travel through the village.	32
(T/23/105/WS)	27	Yes	My house is situated one house in from the main road running through Ystradowen. From this view point, I get to see not only the volume of traffic travelling through the village at all times of day, but the speed of the traffic. Whilst some adhere to the 30mph speed limit, it is very obvious that many do not. Lorries, particularly quarry lorries, cars and vans hurtle through the village at breakneck speed with no care or thought towards pedestrians, be they dog walkers, families, elderly residents or school children. At 30mph, the majority passing though are well exceeding that - 40/50mph would be a well guessed estimate. The road through Ystradowen is an accident waiting to happen. It begs the question, as to why during the soon to be introduced 20mph initiative, is Ystradowen being left off the list and discriminated against. Aberthin, just down the road have achieved a 20mph status months in advance of its	32

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
(T/23/105/WS)	27 (Cont)		countrywide roll out. Ystradowen is in greater need as we have no natural 'sharp' bend in the road to help slow the traffic and we have a lot of pedestrian traffic walking to and from the pub, community centre, play area and church. If a 20mph speed limit were enforced, at least there could be more of a likelihood of motorists driving nearer to the 30mph speed limit, as most won't drive slowly, as can be seen in Aberthin. In essence, I am extremely concerned that if the traffic speed isn't included in this traffic slowing initiative, that one day somebody or something is going to seriously hurt or killed and I hope to goodness that it's not me, my family or my beloved pets	
(T/23/105/WS)	28	Yes	Ystradowen should 100% receive the 20 mph limit as we see on a daily basis vehicle's of all shapes and sizes constantly speeding through our village. Something needs to be done to resolve this before someone gets hurt.	32
(T/23/105/WS)	29	Yes	Narrow footpaths and there is an area with no footpath through the village.there are school bus drop of points in the village and children when they get of the buses it can be a very dangerous time for them Cars frequently speed through the village and bearing in mind the recent fatality on the a48 on 7 July 2023 -I find it unsafe turning right out of my road as cars pick up speed coming down the hill The speed limit should drop to 20mph in ystradowen	32
(T/23/105/WS)	30	Yes	The road through Ystradowen has seen a number of fatalities over the years. That's reason enough to slow traffic given 20 mph is less likely to kill. The road is used for school buses and children are at risk. Aberthin already sets a precedent for a 20 mph speed limit on a stretch of road where it is not possible to do 30 given the sharp corner. Speeding is common in the village with several blind exits. This is dangerous. Ystradowen must not be left out of a 20 speed limit	32
(T/23/105/WS)	31	Yes	I live facing the main road through ystradowen. There are plenty of vehicles passing through obviously not sticking to the 30mph limit. If this can not be decreased to 20mph maybe it can be looked into putting other measures in place like average speed cameras like they have done elsewhere. Think that could be a happy compromise.	32
IF967 (T/23/105/WS)	32	Yes	Ystradowen needs to fall under the new 20mph regulations. HGV traffic and all manner of fast vehicles use the main road running through the village and school children are being put at risk as they use the school bus stop abutting the main road.	32
T/23/105/WS	35	Yes	This road is very dangerous. There is a school bus stop and 2 public bus stops on the road side. School children fill the pavement and often perilously spill onto the road at school pick up and drop off times. A terrible accident waiting to happen given the speed of cars through the village. Young children cross the road to the village hall and children's playground.	32

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/105/WS	36	Yes	I disagree with the speed limit of 30mph remaining on Cowbridge Road through the village. Vehicles already drive excessively fast on this road. There are two bus stops (used by school buses) and narrow pavements on this road.	32
T/23/105/WS	37	Yes	This road should be 20 Mph, cars do not slow down to 30, the pavements are very narrow and it always feels quite dangerous.	32
T/23/105/WS	38	Yes	the cars already go through our village at 40. - 59mph and above. with narrow pavements and school bus stops this is extremely dangerous speed through village already. 30'mph is not followed already!	32
T/23/105/WS	39	Yes	people do not follow the 30 mph speed limit now - so this will not be followed under new scheme. we have evidence of cars speeding over 45mph through the village even whilst school children standing on narrow pavements	32
T/23/105/WS	40	Yes	Most traffic speeds dangerously through this village, so much so they often don't stop at the pelican crossing when the lights are red. There are a lot of children in the village and walkers and it's incredibly dangerous. I think it is irresponsible to not include ystradowen in the 20mph law change. Please don't wait for a tragedy to happen before this change is made	32
T/23/105/WS	41	Yes	I have significant concerns over the safety of the main road through ystradowen. In recent weeks there has sadly been a fatal accident just before the village and the pavements throughout are perilously narrow. Due to being a rural community the only places we or our children can walk to are the local garage/shop or pub which all require walking at the side of the main road. It makes no sense at all to have a different speed through our village and indicates a "less important" signal to drivers which is a huge oversight. The community council have worked tirelessly to try and maintain safe driving on this road including signing up to volunteer schemes and this decision in no way supports their efforts. Have the planners of the scheme visited the village to assess the risk and understand the community? Most of which are either young families or vulnerable elderly. I know the community council or any of us who volunteer to support our village would be happy to assist. Thank you	32
T/23/105/WS	42	Yes	The road running through the village of Ystredowen should be 20mph. Cars travel at excessive speeds on this section there are many children that use that road for their school bus, it is not safe. Traffic cameras are often used	32
T/23/105/WS	43	Yes	Drivers continue to speed through Ystradowen. It is imperative that the speed limit is reduced to 20mph to ensure the of our children.	32
T/23/105/WS	44	Yes	I feel the speed limit through Ystradowen should be 20mph. We have children walking and playing in the area. cyclists use the road. It is a very busy road and people do speed. 20mph would make it safer. Other areas have the 20mph limit. Aberthin for one; cars come from a country lane to 30mph to 20mph and it has proven a success. I wish the same for Ystradowen.	32

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/105/WS	45	Yes	The speed limit through ystradowen should be 20mph, not 30 as you are suggesting. The speed cars drive through now with it being 30mph an accident is likely to happen so strongly urge you to change it to 20mph	32
T/23/105/WS	46	Yes	I strongly believe the main road through ystradowen should be 20mph	32
T/23/105/WS	47	Yes	The road through Ystradowen also needs to be 20mph. This is a disaster waiting to happen with cars speeding past every day	32
T/23/105/WS	48	Yes	Silly decision not to have this road as a 20mph zone. There are bus stops, of which serve two schools. Children attending Llansanoor Primary wait at the side of this road for the morning bus and get off in the afternoon. Cars regularly going fast around the corner leading to the bus stops. The single pavement leading from the village to the petrol station/shop is very narrow with over grown hedges. This causes pedestrians to have to step into the road which is highly dangerous. There are regular attendances by police and Go Safe on this road which is a clear indication that vehicles regularly speed along here and safety risks have been noticed. The reduction to 20mph would only add 28 seconds to a journey through Ystradowen and so keeping it as a 30mph does not provide a significant advantage over the risks and dangers it already poses to pedestrians. This road should be 20mph.	32
T/23/105/WS	50	Yes	People drive through the village far too fast and it is very dangerous to all the children that live in the village. The pavements are also very narrow, should definitely be 20 miles an hour.	32
T/23/105/WS	51	Yes	I understand that the plan for the main road (A4222) through Ystradowen is not to change to 20mph. I object to this Drivers speed through the village - it is an accident waiting to happen. The A4222 should also be considered as a 20mph zone	32
T/23/105/WS	52	Yes	Living on the main road, we are sadly so used to seeing people speeding through our village with no consideration for residents and school children crossing the road.	32
T/23/105/WS	53	Yes	I object to the exception, the road that runs through Ystradowen splits one side of the village from the other, with the majority of residents in Ystradowen being young families with very young children is it an absolute disgrace that the Vale council could even think about allowing our village to be an exception to the new 20mph proposal. On one side of our village we have a beautiful play area for toddlers, Astro turf and village hall, all of which is accessed by village children and families who live the other side of the road, meaning to get to use all of these wonderful facilities we have to cross this horrific road where cars do not even abide by the 30mph rule. It is so dangerous, and now even more so	32

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/105/WS	53 (Cont)		with the pub and the increased footfall and traffic in the village. I live very close to the main road and would like to add that the noise pollution is getting worse and worse by the day with large heavy lorries from the quarry passing through at speed! I believe Ystradowen should be no exception to the 20mph rule and it will be an utter disgrace of this is approved!	
T/23/105/WS	54	Yes	I am objecting to the proposals to keep the A4222 through Ystradowen as a 30mph zone and that that it should be a 20mph zone. Vehicles speed very dangerously through this area where many children and young families live. Many children wait at the bus stop and the speeds through the village are unsafe. I believe it should be treated in the same manner as Aberthin which is also a small village on the outskirts of Cowbridge.	32
T/23/105/WS	55	Yes	Traffic travels through Ystradowen well above 30 mph. The speed limit needs to be reduced with more frequent monitoring	32
T/23/105/WS	56	Yes	The main road through Ystradowen should not be an exception to the 20mph speed limit, it should be included in the 20mph speed limit to improve safety for village residents . Vehicles are frequently observed at exceeding the current 30mph speed limit. A reduction would encourage motorists to reduce speed to a safer level. There is frequent crossing of the road at various intervals to access the amenities of the village - petrol station , post box, 2 children's play areas on opposite sides of the road and at both ends of the village hall, the pub and church. The pelican crossing is well used but is not centrally placed. A reduction to 20mph gives people more time to cross the road safely where it is not practical to cross side roads and walk inclines to use the pelican crossing. There is a lay-by on one side of the road for the buses to stop (although generally the buses stop on the road). The road has been altered and narrowed on the other side of the road to facilitate a bus stop . This is also on the brow of the hill. Drivers do not have a clear view to overtake buses that are stationary whilst passengers alight or disembark. A reduction to 20mph would improve safety around these bus stops A A reduction to 20mph would reduce gas emissions in the village	32
T/23/105/WS	57	Yes	Objecting to Ystradowen being excluded. It should be included in the 20mph zone	32
T/23/105/WS	61	Yes	I believe that the section through Ystradowen should be assigned a speed limit of 20mph. Children are often walking / scooting along this road and there is a tendency for cars to speed through the village	32
T/23/105/WS	64	Yes	This is a main road where cars speed through the village where many children are walking through	32
T/23/105/WS Ystradowen	121	Yes	The A4222 passes through Ystradowen and should remain at 20mph for the following reasons: The road is used a lot by pedestrians, including young children, and there is not a continuous pavement on both sides of	32

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/105/WS Ystradowen	121 (Cont)		the road which means accessing the community facilities (community centre/Parc Owain) presents a danger. The road has incorrectly been designated a strategic route - the same road running through Aberthin to the South has a 20 mph limit with exactly the same volume of traffic. There are a number of junctions where there is limited visibility of the main road, including the entries and exits of the petrol station, and in terms of safety the lower limit is the only acceptable option. The lower limit also reduces the amount of air pollution, a key aim of the government.	
T/23/105/WS	122	Yes	Safety. Children use the road a lot, and lots of blind corners and junctions, and many people use the road at speed currently anyway.	32
T/23/105/WS	124	Yes	The road through Ystradowen already has problems with people driving too fast. There are many children in the village and there is a high number of residential houses either side of the road. Although there is already a crossing mid village there are numerous other places where many children and adults will need to cross the road. It should be included in the 20 Mph scheme- the same as Aberthin which already has a 20mph limit.	32
T/23/105/WS	128	Yes	Dear Mr. Clogg, I am writing on behalf of Penllyn Community Council to object to the proposal by the Vale of Glamorgan Council (VoG) to apply a Traffic Regulation Order (TRO) in Ystradowen to Cowbridge Road (A4222) which would maintain the 30mph speed limit running through the village. We have attended several meetings where the proposals have been explained including one with the Welsh Government Minister, Lee Waters. We have read carefully the Welsh Government's publication 'Setting exceptions to the 20mph default speed limit for restricted roads: How highway authorities can set exceptions to 20mph speed limits on restricted roads in Wales' and the principles set therein on how an exception should be applied. We have also read the Statement of Reasons published in the Vale of Glamorgan Council (Various Roads 20mph and 30mph Speed Restriction) Revocation and Exceptions Order 2023 which states that the VoG's reason for maintaining the 30 mph is the need to maintain the existing speed limit on selected strategic roads including part of the A4222 as as a 'strategic route with higher volumes of daily traffic compared to urban residential streets and as such to not meet the criteria or the nature of a road with a speed limit of 20mph. The Council considers that the existing 30mph speed limit is an appropriate speed limit in order to maintain a reasonable traffic flow on higher traffic volume strategic routes.' Penllyn Community Council argues that the VoG has failed to interpret the Guidance correctly and is acting unlawfully in maintaining the 30 mph. First, the Statement of Reasons does not give any 'robust evidence' for its claim that a reduction to 20mph would lead to an unreasonable flow of traffic on this 'strategic' route. Second, it does not indicate how it has taken into account 'local factors.' The TRO sets out a blanket Statement of Reasons covering the whole of the Vale of Glamorgan. Third, at no	32

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/105/WS	128 (Cont)		point in the TRO does the VoG explain how it has interpreted the Guidance, specifically the Section 2.1 and how Questions A and B have been interpreted in relation to Ystradowen. It appears no consideration has been and likely to grow further. Recent developments have brought a considerable number of young families with children to the village who like to access the community centre and Parc Owain which has a MUGA, an U7s children's park, a pétanque piste and open space for children to play and cycle and for residents to walk their dogs. At present, parents and grandparents are reluctant to allow their children to cross the busy main road alone as motorists and lorries frequently exceed the current 30 mph speed limit at all times of day including when children are waiting for and descending from the school bus. Some motorists have been known to accelerate rather than slow down when they see someone about to press the button for the pelican crossing so they can beat the lights! The Statement of Reason given in the TRO implies that the more our village grows (and planning for future developments are pending) and the more traffic that will be generated, the less likely we will be able to have a 20mph speed limit. As stated, this is contrary to the underlying aim of the legislation to encourage motorists to drive more slowly so that 20mph becomes the norm. In turn this will lead to more walking and Cycling by residents in a safer environment with lower emissions. It is acknowledged by Welsh Government that the reduction to 20mph marks a radical change and will be the start of a huge cultural shift which will take time to embed. However, there is strong evidence from Welsh Government's pilot studies that the policy will achieve its aims and change people's behaviour for the better. Penllyn Community Council and the residents of Ystradowen who they represent are fully in favour of the new policy and want their community to benefit from this Welsh Government policy which will improve the quality of life for all. Yours sincerely, Councillor Sara Howells	
(No Ref No.) Ystradowen (T/23/105/WS)	138	Yes	People are speeding through the village on a regular basis and being a mum of young children who lives close to the road it makes me extremely anxious and annoyed. It needs to be 20mph through Ystradowen before someone gets killed.	32
(No Ref No.) Ystradowen (T/23/105/WS)	139	Yes	Many people come through much quicker than 30mph, perhaps 20mph signs will slow them down as they do in Aberthin.	32
T/23/105/WS	140	Yes	The main road through Ystradowen is currently 30mph, however very few people stick to this limit and often drive at speeds vastly exceeding it. There are a lot of young children in the village, the main park and football pitch are across the road from most of the houses and it can be absolutely lethal attempting to cross; even just walking among the main road can be scary with a toddler due to the speed that some people drive past. I feel if this road was a 20mph limit it would help to encourage some people to slow down	32

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/105/WS	142	Yes	Ystradowen is a village with a large child population and the community hall (located just off the proposed exception route) has a very active user base of all ages. As a ribbon village the majority of pedestrian traffic is along the road in question, and there are in particular a lot of pedestrians crossing the road opposite the community centre (and the White Lion immediately adjacent) where there is no crossing facility. Further, that part of the road is in a dip from both directions, limiting visibility for oncoming vehicular traffic. Immediately to the south of this crossing where there is currently a transition from 40mph to 30mph many drivers are already slow to respect the change in speed limit, particularly some of the lorries heading to the nearby quarry and industrial estate. Instituting the 20mph limit would hopefully curb some of these drivers and make this crossing area much safer. The opening of the new primary school on the Cowbridge Comprehensive site, along with the proposed new housing developments in Ystradowen, are likely to lead to a marked increase in pedestrian (and bicycle traffic in the village, particularly around school bus pick up/drop off times (and including younger children who are less aware of traffic). The TRO lists the proposed distance of this exception as 722m. By my calculations the additional time incurred by a driver proceeding at 20mph instead of 30mph will only be an extra ~25 seconds added to their journey! I find it hard to believe that saving that inconsequential amount of time is a reason to apply an exception to reducing the speed limit on this road.	32
T/23/105/WS	143	Yes	Such a dangerous road for all as motorists speed through the village with no consideration for pedestrians in the village. With new housing development more and more young families with children are using the road to cross over to use the village hall and playground facilities.	32
(No Ref No.) Ystradowen (T/23/105/WS)	144	No ?? (Yes)	Please accept the 20mph through Ystradowen, someone is going to get run over soon the speed they drive. There are many kids in the village too 20mph is needed in Ystradowen	32
T/23/105/WS	145	Yes	I would like to see a 20mph limit through ystradowen Village (Cowbridge Road) to try and reduce the speed hat cars travel through.	32
T/23/105/WS	148	No	I support the Cowbridge Road (A4222) being 30mph through Ystradowen IF drivers would stick to that speed imit but currently many do not. Rather than drop the limit, would it be possible to site average speed cameras through the village?	32
No Ref No. (T/23/105/WS)	149	Yes	This is a complete waste of time. People who speed in a 30 will also speed in a 20. In my 18 years in the village there has only ever been on accident, when a girl ran into the road off a bus. She had minor injuries.	32

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/105/WS	150	Yes	The traffic regularly over 40-45 through the village. Trucks and even buses abuse the limits and are dangerous. to keep it at 30 limit will be dangerous.. South Wales Police are regularly doing camera work due to regularly doing camera work due to regular complaints . I'm a retired Traffic officer	32
T/23/105/WS	157	Yes	Ystradowen is small village with lots of young children. The road is currently 30mph, but cars often drive much faster than this, so is very hazardous. Changing the road to 20mph would be much safer for all residents, especially when there are two children's parks in the area.	32
T/23/15/WS Error (T/23/105/WS)	159	Yes	The road through Ystradowen is very busy. Not to mention that the local pub, Garage & shop, church and village hall are all situation on this road. The village has a large amount of children using the pavement either either side of the road and most of these children cross the road to use the 'multi use sports area' situated on the opposite side of most of the houses. It's seems ridiculous to not include this road within the 20mph plans and make this much safer for all that reside here.	32
T/23/105/WS	170	Yes	I am writing to state our objection to make Ystradowen exempt. I see no reason why this decision has been taken and consider this an invitation to those who use the road through the village purely as a transport route to continue to exceed the current speed limit. There are frequent near misses when children and young people are crossing the road to use the school transport. Our young people and those who are reliant on the village garage amenities regularly walk along this road and ignoring the potential risk of a significant RTA seems ridiculous.	32
No Ref No. Ystradowen (T/23/105/WS)	171	Yes	Too risky. Lots of children and families in the village now. Kids walk/cycle to Astro so needs to be 20 also pub has meant more people too on side of road.	32
T/23/105/WS Cowbridge Rd (A4222) (part), Ystradowen	173	Yes	I am writing as Chair of the Ystradowen residents' association, the Ystradowen Community and Sports Association (YCSA), to object to the proposal by the Vale of Glamorgan the speed limit on the main road running through the village at 30 mph. The reasons given by the Council to justify their decision do not provide adequate evidence and fail to take into account local factors including how people use the village facilities and have to cross a very busy road to do so. The YCSA do not see how these reasons meet the guidance on exceptions set out by the Welsh Government. Indeed, the exception seems to run counter to the aim of the legislation. The YCSA run the village community centre which is hub for a range of activities for all age groups	32

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/105/WS Cowbridge Rd (A4222) (part), Ystradowen	173 (Cont)		in the village. Many villagers walk to the centre and the adjacent facilities including the local church, pub and Parc Owain which has a MUGA, children's play area and boules piste. The A4222 is a very busy road and motorists frequently exceed the 30 mph speed limit and at all times of day. Enforcement by Go Safe Wales only happens a few times per year and is by no means a sufficient deterrent. Requests made to the Council for speed calming measures have been ignored. It is implied that a fatality is needed before any action can be taken. We want to avoid this at all costs and this new legislation could be the answer. It is a shame that no consultation has been undertaken with YSCA or with residents of Ystradowen. It would have been clear to the Council that residents are extremely keen to have a 20 mph on the main road through the village and support the Welsh Government's policy.	
T/23/105/WS Ystradowen area	174	Yes	I can see no reason to exempt ystradowen from 20mm limit. It is a residential area with a high number of children and elderly residents. It is flanked by towns / villages with 20mm h restrictions (aberthin and Pontyclun) along the same road. There are no other traffic calming measures in the village and there are incidents of pedestrians being injured. Reduction to 20mm h through the village will not significantly affect traffic flow any more than it does through Pontyclun and aberthin	32
T/23/107/WS	120	Yes	Darren (Gibbets) Hill is a slip road and should not be 20mph	33
T/23/109/MS	91	Yes	This section should be 20mph at least until the far side of the roundabout (nearer Baron Court), the traffic is frequently backed up here anyway. Pedestrians struggle to cross the road at the roundabout - it is a key pedestrian link between Cogan station/Penarth generally and Penarth Marina. For cyclists also it is a key route with no alternative from the Pont y Werin to Penarth Town Centre/Andrew's Road for links to up Merrie Harrier and roundabout were slower. It does not meet the Welsh Governments criteria for exemptions	34
T/23/109/WS (Part)	106	Yes	Lower Windsor Road is a hazardous commuter route lined with parked vehicles with extreme air pollution. When not totally congested residents and pedestrians are subject to dangerous speeding vehicles. This road should not be excepted and certainly should be subject to 20mph. Schemes should be devised to enhance safety, public transport and active travel.	34
T/23/109/WS	109	Yes	I fully support limiting ALL residential roads to a 20 mph limit. Although I often drive along Windsor Road, I see no reason to exempt it from a 20 mph limit. It is a residential road and its residents deserve the benefits that a 20 mph limit will bring in terms of lower noise and pollution and enhanced safety	34
No Ref No. (Windsor Road (T/23/109/WS)	112	Yes	If the intention of the speed limit is to reduce the risk of injury I wonder why this stretch of road is to be exempted? It's one of the busiest roads in Penarth and there are pedestrians.	34

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/109/WS	113	Yes	An exemption on Lower Windsor Rd makes no sense at all. It's a bottle neck at peak times with queues and as a result. Street parking makes it very narrow exiting Penarth just after the rail bridge. The view down the road is restricted by the bridge and the curve in the road. Cyclists coming into Penarth are very exposed. A lot of school students walk to school. It's a residential street with high levels of pollution. If anything there needs to be work looking at reducing traffic volume while speeding up the transit times for Public Transport. This would make the bus more convenient especially if the Health Hub is to be sited at Cogan Leisure Centre and improve air quality	34
T/23 (T/23/109/WS)	118	No	20 mile and hour needs to be brought in to Windsor road ASAP before there is a fatality speeds are often in excess of 40 miles an hour	34
T/23/109/WS	123	Yes	I note that VOG are proposing an exception to the 20 mph limit on Windsor Road from the junction of Andrew road - in a south easterly direction for 437 metres. This is a residential area with heavy traffic that has previously recorded unhealthy carbon monoxide levels from car pollution. 30 mph cannot be appropriate in such circumstances. You have put forward no reasoned case for setting a speed limit 50% higher than the norm and would ask VOG to reconsider this exception.	34
T/23/109/WS	126	Yes	This proposed exception appears to fail many of the criteria set by by Welsh Gov for exceptions. The routes into Penarth are limited and Windsor Road is listed as an active travel route for walking with a high priority / short-term plan for VALE-SPR Future-005C (Cycle). This means there are significant numbers of both walkers and cyclists along this road. As a result, it fails Question A in the WG Guidance. It also fails Question B in the WG guidance as cyclists do mix with traffic the near whole length. The exception for this is a few meters at the south end where the most recent cycle lane (from the redone roundabout) will spit cyclists straight into the proposed 30mph exception. There are also significantly more than 20 properties per 1km with properties/ retail premises on BOTH SIDES. While I appreciate the allotments on one side reduces the need for many pedestrians to cross, it does not change the fact that cyclists must cross the other lane of traffic at every junction along the proposed exception. Given the route into Penarth is on a hill cyclists are often traveling slower than they would on the flat and the blind corner under the railway bridge it seems a 30mph exception is at odds with nearly all the criteria set by WG including the Active travel legislation to encourage people from their cars. The road itself is also extremely narrow in places because of the parking which often means large vehicles have to give way. The carriageway width reduction just south of the railway bridge has also caused several accidents most recently this week where the fire brigade and police had to attend. The road is also one of the most polluted roads in Wales and failing to encourage Active travel along this road will not	34

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/109/WS	126 (Cont)		help this. I have repeatedly tried to get the detail regarding this exception from the Vale of Glamorgan Council but have been delayed and fobbed off with generic responses.	
T/23/109/WS Cogan Hill & Roundabout	167	Yes	The answer to the principal questions in the WG guidance documents is yes for both A and B for this section of road, on road cycle route without dedicated provision and the potential for a lot more cyclists if the speeds were lower. And a highly used crossing point with no pedestrian priority. The distance of approximately 265 metres is also shorter than the 300 metres WG minimum guidance.	34
T/23/109/WS	168 (Part)	Yes	High volume of queuing motor traffic, a key bottlenecks for travel from the Vale into Cardiff with more or less no active travel provision so cyclists on the road and few safe crossing points for pedestrians. Both Principal Questions are answered 'yes'.The segregated (shared) cycle path is not feasible to use when cycling into Dinas Powys (no accessible entry and exit points) so cyclists are on the road for this section.	34
T/23/109/WS	4 (Submission in Welsh)	Ydw Yes	Welsh - Original Format :- Mae llawer iawn o feicwyr yn defnyddio'r heol yma fel y ffordd byrraf o Gaerdydd i'r Barri. Maent felly yn llif traffig yn gyson drwy Ddinas Powys cyfan. Mae cyfleusterau a thai bob ochr o'r ffordd, a phobl yn eu cyrraedd wrth gerdded ar draws yr heol, wrth groesfannau swyddogol ai peidio. Yr unig rhan o'r heol o dan sylw a all gael ei eithrio o'r terfyn cyflymdra 20mya yw'r rhan hwnnw rhwng y Merrie Harrier a dechrau'r pentref, hynny yw, y rhan sy'n gyfateb i'r lôn fysiau. Ond er bod yr heol yn lletach fan hyn, mae dal yn ddigon peryglus i feicwyr. English Translation:- Many cyclists use Windsor Road as the most direct way to reach west Cardiff from Penarth. The road is fairly narrow, with many cars parked on the side of the road in Cogan. It is therefore challenging for vehicles to give cyclists the 2m of space required by the Highway Code – and when travelling up to 30mph, the risk to cyclists is so much worse than it would be at 20mph. There are allotments on one side of the road, and a few houses, and no safe place to cross Windsor Road without walking along the road within the traffic flow Extremely dangerous. So this road should certainly not be exempt from the 20mph speed limit.	34
T/23/110/WS	17	Yes	I do not feel that such a heavily populated area, with no cycle paths should be exempt. It feels like a very dangerous stretch of road for cycling. Also many people still speed towards the junction into Southra park particularly from the direction of Barry.	35
T/23/110/WS	70	Yes	I feel that all of the cardiff road where there is housing directly adjacent to the road should be 20mph. This road is like a racetrack even with 30mph in place. I noticed that the 20mph restriction ends right by our house which means	35

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number **
T/23/110/WS	70 (Cont)		they will be speeding up right outside people's houses. Creating more noise and pollution than there already is. We suffer enough with the amount of unruly drivers on this road and the large lorries thundering down the road I feel it should be 20mph	
No Ref No. X:315,444.5 Y:170,556.619 (T/23/110/WS)	78	Yes	Barry Road entering Dinas Powys Y:170,556.619 X:315,444.5 this stretch on the entrance to Dinas Powys past Bryn Y Don up to Dinas Powys train station needs to be at 20mph. Cars come down this stretch far too fast. Plenty of cycles use this route and child Barry Road coming into Dinas Powys past cross common road up to the train station needs to be at 20mph. Children use this route to get to school via the buses. It's dangerous to cyclists and the area around it (ie Clos Derwen is built up with families), cars don't respect the current speed limits at all	35
IF 967 (No Ref No.) (T/23/110/WS)	80 (Part)	Yes	The Bary Dinas Powys road is already congested due to new housing developments. Reducing the speed limit will further add to the congestion.	35
IF 967 (No Ref No.) (T/23/110/WS)	81 (Part)	No	I understand why Cardiff road is to keep it's current speed limit but I do think a speed camera should be put in place to catch speeding offenders. Quite often vechiles are not sticking to the 30mph limit and has caused accidents and many near misses plus its difficult and dangerous to cross the road to Bryn yr don and walk along the pavement towards the train station..there's to much overgrowth of trees along the path pushing pedestrians closer to the road edge	35
IF 967 (No Ref No.) (T/23/110/WS)	82 (Part)	No ? (Yes)	I would like to see the 20mph speed limit introduced in Dinas Powys	35
T/23/110/WS	83	Yes	Cardiff/Barry Road A4055 should be 20mph from the junction with Cross Common Road, all the way through Dinas Powys to the bus lane at Merrie Harrier end. The pavement next to this road is inadequate and it is a key walking route from Woodlands Estate/Southra Park to the train station and up to the village and St Andrew's school. Walking here especially with children is unappealing, a reduced speed limit will help this, and hopefully one day the road can be narrowed to provide more space for active travel. Traffic currently travels too fast on this section making turning out of the junctions particularly Station Road and Cross Common Road tricky, reducing the speed will help with this. It will also reduce the overall signage requirements and the consistency of 20mph in residential areas. I am not sure why there are two areas marked as 20mph on this plan as surely all the other streets will be covered by 20mph	35

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/110/WS	85	Yes	My only objection is that there is no enforcement of the 30mph speed limit on Cardiff Road, cars consistently drive over 30mph and there have been many accidents by the vets. As part of this change, if parts of Cardiff Road remain 30mph I would expect drivers to speed up above what they already do to mitigate the speed loss in 20mph zones. Please consider speed cameras or other enforcement of the speed limits to protect pedestrians and other road users	35
T/23/110/WS	89	Yes	I think it should be 20mph along Cardiff Road, from the Cross Common Road junction to the bus lane near the Merry Harrier, in order to make walking/cycling safer & to make junctions easier & safer. Far less signs would be Needed this way too & it'll be simpler for motorists to comply	35
T/23/110/WS	94	Yes	(1) I think the 20mph limit should begin before the Recreational Ground as you approach the south end of Dinas Powys. This would improve safety and access to the Recreational Ground for those walking and cycling there. There is limited pavement access and you have to cross the road as a pedestrian. (2) The 20mph exclusion also covers Dinas Powys station which is a pedestrian destination. (3) The pavement footpath ends at Station Rd on the western side of Cardiff Rd. It would be safer for pedestrians crossing the junction at Station Rd for this area to be 20mph rather than a transition from 30mph. (4) The 20mph exclusion covers high density residential areas, at least from the junction with Cross Common Rd, that all feed into the Cardiff Rd. (5) Cardiff Rd is the main route for cycling, especially as a commuter, and there are no off road cycle lanes in this segment. Cyclists have to share the road with the traffic. The 20mph limit should apply at least where cyclists might join from the high residential areas (from the junction with Cross Common Rd).	35
T/23/110/WS	127	Yes	The entire length of the proposed exception is on the planned Active Travel VALE-SPR-Future-001D for walking and cycling and without segregated cycle paths and footpaths along the length of it should not have an exception as this will only discourage active travel. Your maps also fail to show the new Cross common road which joins further south and the new housing which extends south. This has increased the number of walkers and cyclists going up into Dinas Powys Village and Dinas Powys Station and clearly hasn't been considered as they are not shown on the map	35
T/23/110/WS	169	Yes	Completely surprised at this proposal. It doesn't meet any of the WG guidance for exceptions. The answer to the principal questions in the WG guidance documents is clearly yes for both A and B for this section of road which has no dedicated provision for cyclists and few safe crossing points for pedestrians. it also fulfils the Place Criteria for 20mph. It is a key active travel route for travellers from Barry moving towards Cardiff, including myself. Close and fast passes are very common, even on the blind bends though the village. The potential number of those walking and cycling this route is hindered by the volume and danger of motorised	35

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/110/WS	169 (Cont)		traffic - it is exactly these conditions that 'default 20' is intended to counter. By matching motor speed more closely to that of active travellers, potential harm is reduced.	
T/23/110/WS	2 (Submission in Welsh)	Ydw Yes	<p>Welsh - Original Format :- Mae'r heol drwy Ddinas Powys yn cael ei ddefnyddio gan lawer iawn o feicwyr a cherddwyr Mae'r rheiny oll yn agos iawn at, neu o blith, cerbydau modur. Ni ddylid eithrio unrhyw rhan o Heol Caerdydd drwy'r pentref rhag y gorchmynion, ag eithrio y rhan o'r heol sy'n arwain o'r pentref at y Merrie Harrier lle bo'r lón fysiau yn weithredol. Mae yna siopau, ysgol, pob math o gyfleusterau hamdden, dwy orsaf trén, lle mae pobl yn croesi'r heol yn aml iawn, gan ddefnyddio'r croesfannau penodol ai peidio. Noder bod y map yma ddim wedi'i ddiweddarau i gynnwys datblygiad tai Clos Derwen.</p> <p>English Translation:- The road through Dinas Powys is used by a large number of cyclists and pedestrians. Those are all very close to, or among, motor vehicles. No section of Cardiff Road through the village should be exempt from the orders except for the section of the road leading from the village to the Merrie Harrier where the bus lane is operational. There are shops, a school, all kinds of leisure facilities, two train stations, where people cross the road very often, using the specified crossings or not. Please note that this map has not been updated to include the Clos Derwen housing development</p>	35
No Ref No T / 23/111/WS)	80 (Part)	Yes	The Bary Dinas Powys road is already congested due to new housing developments. Reducing the speed limit will further add to the congestion.	36
IF 967 (No Ref No.) T / 23/111/WS)	81 (Part)	No	I understand why Cardiff road is to keep it's current speed limit but I do think a speed camera should be put in place to catch speeding offenders. Quite often vechiles are not sticking to the 30mph limit and has caused accidents and many near misses plus its difficult and dangerous to cross the road to Bryn yr don and walk along the pavement towards the train station..there's to much overgrowth of trees along the path pushing pedestrians closer to the road edge	36
IF 967 (No Ref No.) (T/23/111/WS	82 (Part)	No ? (Yes)	I would like to see the 20mph speed limit introduced in Dinas Powys	36
T/23/111/WS	84	Yes	This section should be 20mph until past the final house leaving Dinas Powys/where the bus lane starts and cyclists/pedestrians therefore are separated from the traffic by the bus lane. There are many houses on this road, well over the 20per km referenced in Welsh Government guidance. The traffic here in both direction is often	36

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/111/WS	84 (Cont)		congested throughout the daytime so it will make little difference to journey times. There are numerous bus stops used by secondary school children and it is a key route to schools, train station and the village centre. Additionally extending the 20mph zone to this point will greatly reduce the overall number of signs needed as it will avoid the need to put a 20 sign on every road junction of which there are many.	
T/23/111/WS	90	Yes	I think it should be 20mph along Cardiff Road, from the Cross Common Road junction to the bus lane near the Merry Harrier, in order to make walking/cycling safer & to make junctions easier & safer. Far less signs would be needed this way too & it'll be simpler for motorists to comply	36
T/23/111/WS	95	Yes	I think the 20mph limit should apply through Dinas Powys with 30mph beginning at the bus/cycle lane at the north end of Dinas Powys. The exemption covers Eastbrook Station which is a pedestrian destination for the surrounding high density residential area and it is used by school children. Cardiff Rd is also the main route for cycling, especially commuter cycling, and there is no off road cycle lane. I think 20mph should be in place to make it safer for cyclists coming from the residential areas. The curve of the road near Powys Place and near Georges Row means that drivers often overtake cyclists dangerously and a 20mph limit would improve safety for all road users	36
T/23/111/WS	106 (Part)	Yes	Lower Windsor Road is a hazardous commuter route lined with parked vehicles with extreme air pollution. When not totally congested residents and pedestrians are subject to dangerous speeding vehicles. This road should not be excepted and certainly should be subject to 20mph. Schemes should be devised to enhance safety, public transport and active travel.	36
T/23/111/WS	136	No	I would like to see the proposed 30mph section extended along all Redlands rd and Lavernock Rd as it is the the major route for traffic through Penarth to allow traffic to flow	36
T/23/111/WS	168 (Part)	Yes	High volume of queuing motor traffic, a key bottlenecks for travel from the Vale into Cardiff with more or less no active travel provision so cyclists on the road and few safe crossing points for pedestrians. Both Principal Questions are answered 'yes'.The segregated (shared) cycle path is not feasible to use when cycling into Dinas Powys (no accessible entry and exit points) so cyclsists are on the road for this section.	36
T/23/111/WS	3 (Submission in Welsh)	Ydw	Welsh - Original Format :- Mae llawer iawn o feicwyr yn defnyddio'r heol yma fel y ffordd byrraf o Gaerdydd i'r Barri. Maent felly yn llif traffig yn gyson drwy Ddinas Powys cyfan. Mae cyfleusterau a thai bob ochr o'r ffordd, a phobl yn eu cyrraedd wrth gerdded ar draws yr heol, wrth groesfannau	

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/111/WS	3 (Submission in Welsh) Cont	Ydw Yes	<p>swyddogol ai peidio. Yr unig rhan o'r heol o dan sylw a all gael ei eithrio o'r terfyn cyflymder 20mya yw'r rhan hwnnw rhwng y Merrie Harrier a dechrau'r pentref, hynny yw, y rhan sy'n gyfateb i'r lôn fysiau. Ond er bod yr heol yn lletach fan hyn, mae dal yn ddigon peryglus i feicwyr.</p> <p>English Translation:- A great many cyclists use this road as the shortest way from Cardiff to Barry. They are therefore in the traffic flow constantly throughout the whole of Dinas Powys. There are facilities and houses on either side of the road, and people get to them by walking across the road, at formal crossings or not. The only part of the road in question that can be exempt from the 20mph speed limit is that section between the Merrie Harrier and the start of the village, that is, the part that corresponds to the bus lane. But even though the road is wider here, it's still dangerous enough for cyclists.</p>	36
T/23/116/WS	17	Yes	I do not feel that such a heavily populated area, with no cycle paths should be exempt. It feels like a very dangerous stretch of road for cycling. Also many people still speed towards the junction into Southra park particularly from the direction of Barry.	37
T/23/117/WS	88	Yes	I am very supportive of 20mph generally, but I do not see the point of this tiny bit of 20mph. You can't go more than 20mph approaching the junction and it would be pushing it to go faster in the other direction so just seems a waste of signage and resources. If you were to have a 20mph zone anywhere round here it would be on the section of Sully Road between Watery Lane and the entrance to Cosmeston (Old Cogan Hall Farm) as this is a key walking and cycling link with two blind corners you have to turn across which is a nightmare on a bike. I would love to see the whole of Cross Common Road (and Sully Road) made into a 'green lane' with reduced speeds and priority to walkers, horses and cyclists but that is probably for another time. Just don't know why this bit of road has come into this consultation?	38
T/23/120/MS	108	Yes	Hi. Fantastic you are investigating a separate cycle along the a48. I use this daily, but all colleagues in uhw are shocked I do without a lane. This will hopefully get a lot of use. But... proposals are for St nicholas NOT to have one, AND be exempt to 30mph,so I object. I daily have close passes going east bound through St nicholas (not do had west bound for some reason.	39
T/23/121/WS	105	No	Our understanding is that the current 30 mph roads through the villages will change to 20 mph limit. The proposed 20 mph limit order will replace the current 30 mph limit not currently mandated by street lighting. Llangan Area, T/23/65/WS We welcome these changes. Additionally, we would propose extending the	40

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/121/WS	105 (Cont)		20 mph Traffic Order along the un-named road through the centre of the village of Llangan, from the junction with Twchwch Garth eastwards to the junction with Cwrt Canna. The reason for this is to provide safety for pedestrians, runners, dog-walkers and cyclists and horse-riders who regularly use these lanes. We note that these users who wish to walk, cycle or ride, including pupils of Llangan school who wish to use active travel to get to school, are currently denied this opportunity because the road is narrow and unsafe. We believe this is an excellent opportunity to extend the speed limit now to create opportunities for people who wish to use active travel to safely commute to the school and further to Llangan and St. Mary Hill Village Hall. They are currently unable to do so. This proposal extends to drawing T/23/65/WS. We also propose a second extension of the speed limit from Llangan and St Mary Hill Village Hall to the national speed limit at the end of Heol Lidiard. This would encourage safe driving past the entrance to the village hall and near Heol Lidiard. Impact of Proposed Changes on other Rural Roads. Lastly, we would like to understand the impact that these proposals will have on the volume of traffic travelling through the villages of Llangan, Treoes and St Mary Hill. Currently, the villages are used as “short-cuts” by commuters who are guided by their sat navs. These devices do not take into consideration the actual conditions of the environment and the state of these roads, only the routes and speed limits. We are concerned that dropping the speed limit in some areas will result in drivers being routed along other, country lanes, thereby creating undesirable consequences of increased traffic on narrow and unsuitable roads. We would like to see the modelling that has been done around this and understand the impact.	
T/23/122/MS	9	No	I think the 20.mph speed limit should be implemented throughout the entire through road of the village. There are residents, many with young families, at either end of the village.	41
T/23/122/MS	10	Yes	the entire stretch should be 20mph. I live on the straight section and feel it's a drag strip most nights. The safety of children leaving the estate should be considered the most significant and road kill of loved pets is common on this section. Why not place an average speed camera from the start of the village to the end on the Main Street. This would stop speeding.	
T/23/122/ms	11 (Part)	No	Please extend to include the whole main road going through Wick.	41
No Ref T/23/122/ms	12	No	People ignore 30 will do same at 20 as it is a straight road. Just know that people will ignore it . The road needs speed bumps or other calming measures.	41

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/125/ms	11 (Part)	No	Please extend to include the whole main road going through Wick.	42
T/23/125/MS	16	Yes	Whilst I would normally support the limitation of 20mph to the village centre, the unique nature of the main road through Wick I believe warrants it to be 20mph throughout. Driver behaviour (cars and motorbikes) is currently such that as soon as they come round the bend onto the straight road sections either side of the village they accelerate. I believe this will be exacerbated by stepping up from 20mph to 30mph at these points. The police patrol motorcycle typically captures 30-40 speeding motorists an hour when he is on this section of Llantwit Road, demonstrating the existing behaviour. In addition there are multiple blind junctions and no pathways on this straight section of road so people including children and animals are frequently walking along the road.	42
T/23/126/MS	130	Yes	Ewenny Cross is a dead-end culdesac under every criteria set by WG this should not have a 30mph exception. Wick Road has a significant number of properties along both sides of the road which way in excess of 20 per 1km criteria where no 30mph exception should NOT be applied	43
IF 967 (T/23/127/MS)	59 (Part)	Yes	I am specifically rejecting plans to keep St Nicholas road, Broad Street, Pontypridd road and fford y milleniwm at 30mph. St. Nicholas rd and pontypridd road are both residential streets that are also main routes to some of the	44
No Ref No. X: 311,741.598 Y: 168,627.343 (T/23/127/MS) PontyPridd Rd	68 (Part)	Yes	Some of the exempt roads would not require an exemption (I.e Pontypridd road, Gladstone road) yet other roads like Trinity Street and Tynewydd Road would be impossible to drive at 20mph due to the steep incline; these should be exempt. This will just cause excessive emissions with people either stalling constantly or speeding in order to actually get up the hill. The whole 20mph roads is ridiculous anyway	44
IF 967 (No Ref No.) (T/23/127/MS)	115	Yes	Pontypridd Road is a residential road and currently has no cycling infrastructure. It would be safer for this road to be reduced to 20mph to protect all road users.	44
T/23/127/MS Pontypridd Rd	164	Yes	Pontypridd Road is another active travel missing link in the VoG's transport network, it requires on road cycling without dedicated provision. Half its width is devoted to the storage of motor vehicles meaning cyclists need to give a car door's width gap to stay safe, i.e. cycle in the middle fo the lane. This road is a clear yes to both of the Principal Questions, and more than one of the Place Criteria set out in the WG exceptions document.	44
T/23/127/WS	146 (Part)	Yes	1) T 23 128 MS I undertook a petition of local residents in the St Nicholas' Road / Park Avenue / Harbour Road areas: Say NO to 30mph on St Nicholas & Park Avenue We call upon the Vale of Glamorgan Council to Council to apply 20mph default speed limit to St Nicholas' Road & the adjoining Park Avenue, Harbour Road	44

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/127/WS	146 (Part) - Cont		<p>and Broad Street...for the sake of our children and the environment! Name Address Signature This petition was handed into the civic offices on 18th July 2023 in an envelope marked FAO Sandra Perkes. The petition was conducted between 15 – 17th July 2023. Streets petitioned – St Nicholas’s Rd; Park Avenue; Old Village Road; Canon Street; Clifton Street; The Grove; part of Harbour Road; Pyra Court / Yew tree Court /Rowan Court/Holly Court / Laurels flats off St Nicholas’ Road. Additionally, parents at Romilly Primary School. Poor weather reduced petitioning activity over the weekend, I would have like to have covered more streets in the vicinity. Results 185 Signatures in favour of 20mph 17 against The support in favour of 20mph on St Nicholas’s /Park Avenue /Harbour Road is overwhelming. Few needed persuading to sign the petition, the response was almost always an immediate ‘yes’. Many expressed gratitude that someone was trying to do something about it. Concerns about the current 30mph was particularly high among people with children and the elderly. One elderly resident of Holly Court insisted on adding this to the sheet ‘the situation on St Nicholas’ Road has become intolerable -come and see for yourself!!’ I would conjecture that similar results and responses would be obtained in other residential areas of the town where a 30mph is being proposed to be maintained. St Nicholas’ Road is used by significant numbers of children and parents walking up to Romilly Primary School. It, along with Park Avenue and Harbour Road, is also used by significant numbers of cyclists, particulary groups of leisure cyclists heading to and from Barry Island at the weekend. As a cyclist who uses this road several times a week I would point out that the Harbour Road approach to the causeway, on the eastern side of The Ship Inn, is dangerous for cyclists. To move onto the causeway cycle path requires a cyclist to move away from the Harbour Rd kerb into the middle of the lane in order to move onto the traffic island and then on to the cycle path itself. This manoeuvre is dangerous for cyclists as it is a steep hill where traffic behind you often picks up speed significantly beyond 30mph. If there is traffic immediately behind you then it is safer to carry onto the 40mph causeway road rather than take advantage of the available cycle path. To maintain this stretch at 30mph would make an absolute mockery of the Vale of Glamorgan’s active travel ambitions. 2) T 23 127 MS Another hazardous area of road faced by cyclists in this area is the beginning of Pontypridd Road at the roundabout with Jenner Road and Park Crescent. In order to manoeuvre into the turn right box into Claude Road West, a cyclist has to drift across the lane. On several occasions cars have accelerated and dangerously overtaken me on my right hand side as I drifted right towards the box. This despite giving clear 'turning right' hand signals in good time. This downhill section of road at the very least must be made 20mph in order to ensure the safety of cyclists and pedestrians wishing to cross this road. I urge the Vale of Glamorgan council to recognise the depth of concerns in this</p>	

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/127/WS	146 (Part) - Cont		area of barry and rethink its current plans vis a vis these two sections of the proposal I have highlighted above. Thank You. Lynden Mack	
St Nicholas Road, Barry T/23/128/MS		Yes	I note that St Nicholas Road is scheduled to be an Exception By Order Road, so will remain 30mph after September, but Park Crescent is scheduled to be 20mph. St Nicholas Road is a residential street which should come under the same category as Park Crescent. To issue an Exception By Order for St Nicholas Road so that it is excluded from the 20mph limit seems to be inequitable in the extreme. There are a number of parents and grandparents who regularly need to put children in car seats. With our two grandchildren we have no choice but to put them in car seats on opposite sides of the vehicle so that the rear door has to be open on the offside of the kerb. A 20mph limit would go a long way to reducing the risk of an accident. I would also submit that with vehicles parked on one side of the street for much of the length of St Nicholas Road it simply isn't wide enough for the limit to remain at 20mph. I would strongly urge the Council to reconsider the Exception By Order for St Nicholas Road	45
If 967 T/23/128/MS	3	Yes	St Nicholas road should also be 20mph for the saftey of our children	45
If 967 T/23/128/MS	4	Yes	The 20MPH limit introduced by Welsh government, which the VoG are seeking an exemption for on road A4050 should not be granted. This is an incredibly busy road, often with narrow passings, bends, bends, traffic, parking, one-way systems and stop signs making it less than typical.	45
T/23/128/MS	5	Yes	30mph is too fast for st Nicholas road especially for large vehicles like buses. Cars speed along this stretch. We live on Miskin street so need to cross this main road every time we use Romilly Park/ church and the children cross it when walking to school to meet friends. If Park crescent is 20mph I don't see why the whole stretch isn't 20mph. St Nicholas road and the surrounding area is a densely populated residential area and young people need cross road at different places and this needs to be done safely. Park cr has 2 zebra crossings where as st Nicholas road has none.	45
St Nicholas Rd Barry A4050 T/23/128/MS	7	Yes	This is a very dangerous road and needs to be reduced to 20mph. The speed vehicles drive here from the island etc is super fast and very dangerous	45
T/23/128/MS	8	Yes	I fail to understand a reason for exception to 20 mile speed limit for Park Avenue. There have been a number of road traffic accidents with cars travelling in the wrong direction, particularly at the junction of Romilly Park Road and St Nicholas Rd. There is a blind corner which cars approach at speed-	45

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/128/MS	8 (Cont)		indeed one car went through the railings, nearly heading for the railway line. My own car was written off by a car taking the corner at speed whilst it was parked on the right hand side of the road. Speed is already an issue with car users racing up and down to Barry Island. Although Park Ave is a wide road there are always cars from beyond the house holders parked including train passengers, visitors visitors refusing to pay the increased parking charges, including coaches, patrons of St Nicholas Hall and West End social club. In short the road is heavily used for parking. The right of way is from St Nicholas Road with a very tight bend and in my opinion a 20 mile speed restriction would prevent the number of road traffic accidents occurring	
T/23/128/MS	13	Yes	Cars travel up and down St Nicholas Road at incredible speeds, it is extremely dangerous. It should be 20mph	45
T/23/128/MS	14	Yes	This is a populated residential area with many roads opening onto St Nicholas Rd. Many are hidden or on bends: Canon Street, Miskin St, Old Village Rd, Rowan Court, two entries at 6 St Nicholas Rd/solicitors, The Grove. Cars, motorbikes and other vehicles regularly hurtle downhill on this stretch and, living on the corner of the crossroads at Canon Street and Old Village Rd, I often witness braking and swerving as they try to negotiate the narrowing road and the unexpected bends. Pedestrians from the station via Canon St have great difficulty crossing at the junction to Old Village Rd. Elderly residents from Rowan Court similarly take their lives in their hands crossing the road. It is clear that the existing natural traffic calming (bends, roadside parking) is not working at the current 30mph. There are currently no warning signs for crossroads, hidden entrances. There is no designated pedestrian crossing on the upper stretch of St Nicholas Rd. It is currently a dangerous section of road as it is seen as a racetrack for some vehicles. Inclusion in the 20mph zone would go some way to improving this area for residents and road users alike.	45
T/23/128/MS	15	Yes	Please change the speed limit on St Nicholas road Barry to 20mph. I live in Canon Street and everyday have to brave turning right into St Nicholas rd. it's incredibly dangerous and slowing signs are also needed	45
T/23/128/MS	33	Yes	We regularly visit family in Barry and cross this road to access Romilly Park. Cars drive far too fast along this stretch of road.	45
T/23/128/ms	34	Yes	I think it should be 20mph	45
IF 967 (T/23/128/MS)	59 (Part)	Yes	I am specifically rejecting plans to keep St Nicholas road, Broad Street, Pontypridd road and fford y milleniwm at 30mph. St. Nicholas rd and pontypridd road are both residential streets that are also main routes to some of the biggest schools in the vale. Reducih to 20mph ensures that children have safe routes to travel actively to school. St	45

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
IF 967 (T/23/128/MS)	59 (Part) - Cont		Nicholas road has narrow paths, which make it particularly scary to walk down with children to school/ Romilly park/ the various halls that host scouting and children's clubs in the area, when traffic volumes and speeds are high (30mph + currently). Reducing the speed limit here will create safe routes for our children to use without fear of injury or worse. Broad Street has significant issues with boy racer types speeding along it. Reducing the speed limit along its length will restrict this anti-social behaviour. I often see pedestrians and vulnerable route users struggle to cross at the junction to Morrisons. This is due to high traffic volumes and speed. Reducing to 20mph will make it much safer for route users to cross. In general terms, reducing to 20mph will make it much safer for route users to cross. In general terms, reducing to 20mph will make a huge difference to people who already travel actively in the area, particularly vulnerable users, and will go a very long way to encouraging modal shift. I think making exceptions to these routes would have a detrimental effect on active route users and residents in these areas .	
T/23/128/MS	63	Yes	Ship Hill and surrounding road layouts cause confusion with many drivers choosing incorrect lanes or ignoring road markings (on all 3 sides of the triangle road layout) and pedestrian crossings across 2 lanes at the east part. 20mph would give more thinking time. Where there are no pedestrian crossings (west part) it is exceptionally difficult for pedestrian to cross, so 20mph would be safer for all.	45
IF 967 (No Ref No.) (T/23/128/MS)??	66	Yes	RE: A4055, Harbour Road (part), Barry From its junction with the A4055, Park Avenue, southwards and contiguous with the existing 40mph speed restriction, a distance of approximately 235 metres. This is a mistake. There is no good reason to continue the 40mph speed limit in this urban area – particularly as a multitude of shared spaces converge in this area – from cyclists to pedestrians, to park users, to pub-goers and restaurant visitors. Let's slow traffic down, not permit it to be used as a speedway	45
IF 967 (No Ref No.) (T/23/128MS)	86	Yes	The plans show maintenance of 30mph speed limits on a number of stretches of road which are designated because of the high volumes of traffic. Welsh Government guidance https://www.gov.wales/setting-exceptions-20mph-default-speed-limit-restricted-roads.html (Section 2.1) notes that exceptions may be made and 30mph maintained if certain criteria are met. I do not believe that the criteria are met for the stretches of St Nicholas Road, Broad Street and the connected streets shown in the plans. Section 2.1.3 describes specific questions to be considered in providing an exception: (A) Are there significant numbers (or potential numbers, if speeds were lower) of pedestrians and cyclists travelling along or across the road? (B) If the answer to A is 'yes', the pedestrians and cyclists mixing with motor traffic? Section 2.2.8 of the Guidance provides non-exclusive criteria are for answering questions A and B: Are the sections of road: • Within a 100m walk of any educational setting (e.g. primary, secondary, further education and higher education) • Within 100m walk of any community centre • Within	45

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
IF 967 (No Ref No.) (T/23/128MS)	86 (Cont)		<p>100m walk of any hospital • Where the number of residential and/or retail premises fronting a road exceeds 20 properties per km. Given these guidelines, the exceptions should not be made for these stretches of road because: •</p> <p>St Nicholas Road: o St Nicholas' Community Centre is on St Nicholas Road. In line with guidance, no areas within guidance, no areas within 100m walk should be granted this exception. o Most of the stretch of St Nicholas' Road from the Park Avenue to the roundabout Junction of Porthkerry Road is residential, with housing on both sides of the road. o There are also community assets on both sides of the road, including The West End Club as well as the Community Centre. o This section includes routes to Romilly Park that are used by a very large proportion of the population to the East of the road, including families with small children and unaccompanied children of older primary and younger secondary age. The road and pavements is narrow, without marked pedestrian crossings and with poor sight lines. o St Nicholas Road is a pedestrian route to Romilly School, and to Ysgol Gymraeg Bro Morgannwg and Whitmore o This stretch of road meets all of the criteria to not be granted an exception. The Council should follow the guidance and not make exceptions for this area • The Broad Street stretch of road: o This stretch o road includes the crossing to Barry Station. Barry Station recorded 349, 146 entries and exits in 2021-22 according to the UK's Office of Rail and Road https://dataportal.orr.gov.uk/statistics/usage/estimates-of-station-usage/. The majority of these will be via this crossing, which is also much used by families with young children and unaccompanied children of older primary and younger secondary age. o The road leads to a retail and leisure section Broad Street with extremely high footfall and mixing of traffic and pedestrians, often young people who have been drinking alcohol and are crossing the road between the bars and clubs. It would clearly be safer to impose a 20mph limit earlier on the stretch of road, rather than requiring drivers to rapidly decelerate just as they reach a busy area. The guidance also notes o The guidance requires local authorities to consider potential users, not just current ones This the main road linking large sections of western Barry to the centre. There is currently some cycling along these routes; a 20mph limit would encourage this, and so support the Vale of Glamorgan's active travel and climate change strategies • There are acknowledged issues with traffic on these stretches of road including unlicensed vehicles (dirt bikes and quad bikes) and speeding. The area often appears to form a circuit for high speed driving, in particular at night in the summer. Exempting these stretches of road from the legislation is likely to encourage this already unlawful behaviour and make traffic calming measures that could address it impossible • It is not clear what the rationale for imposing these exceptions is. The routes lead to Barry Island, which can lead to high traffic volumes on specific days, but these are limited and it is not clear that exempting small stretches of road will ease this in any way. It is notable that the causeway to Barry Island is not exempted, despite the fact that there are no residences and wide pavements on only one side, limiting traffic and pedestrian mixing. I am glad this exception has not been made</p>	

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
IF 967 (No Ref No.) (T/23/128/MS)	86 (Cont)		for this stretch, but it is clearly inconsistent. • It is not clear what the benefits to drivers are, in comparison to the costs to pedestrians and residents. Exempting small stretches of road will not appreciably reduce the journey times for drivers, but will create increased risks for pedestrians and other road users (as drivers may begin to accelerate into these areas and not realise they have ended suddenly) as well as costs to council tax payers (as signage will have to be put in place and maintained for these stretches) In summary, these exceptions are not in line with Welsh Government guidance, will create risks to pedestrians and other non-car road users without bringing any benefit to drivers who are staying within the law. these exceptions should not be made: these areas should be 20mph as the surrounding areas are.	
IF 967 (No Ref No.) (T/23/128/MS)	114	Yes	The area going up and down the hill to Harbour Road is well used by pedestrians. The junction at St Nicholas Road and Park Avenue is extremely dangerous to cross. Cars come down the hill at speed and poor visibility means it is hard to see what is coming around the corner. This junction really needs to be improved, which includes changing it to a 20mph road.	45
T/23/128/MS	116	Yes	There is no requirement for this road to be an exception to the 20 mph limit. I drive up this road every day and very rarely go above 20mph because of the traffic and roundabout. Also considering bus stops, side roads and parked vehicles, 20mph is sufficient.	45
T/23/128/MS	117	Yes	As previously stated during an early consultation, the 20mph zone should continue from Park Crescent down St Nicholas Road for safety concerns. Further the Park Avenue, Broad St and Harbour Road areas should be reduced, especially given the number of pedestrian crossings (4) covered by the proposed exemption.	45
T/23/128/MS	135	Yes	The answer to the principal questions in the guidance documents is yes for both A and B, on road cycle route and potential for a lot more cyclists if the speeds were lower. The distance of approximately 205 metres is also shorter than the 300 metres WG minimum guidance. Chopping and changing speed limits for short sections of roads is confusing for all users.	45
T/23/128/MS	151	Yes	This route has a number of blind junctions and sharp bends with an incline and is safer with a 20mph speed limit	45
T/23/128/MS	153	Yes	The answer to the principal questions in the WG guidance documents is yes for both A and B for this section of road, on road cycle route without dedicated provision and the potential for a lot more cyclists if the speeds were lower. The distance of approximately 205 metres is also shorter than the 300 metres WG minimum guidance. If there are or could be cyclists, the road should be 20 - regardless of its width, the traffic speed etc.	
IF 967 (T/23/129/MS)	59 (Part)	Yes	I am specifically rejecting plans to keep St Nicholas road, Broad Street, Pontypridd road and fford y milleniwm at 30mph. St. Nicholas rd and pontypridd road are both residential streets that are also main routes to some of the biggest schools in the vale. Reducih to 20mph ensures that children have safe routes to travel actively to school. St	46

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
IF 967 (T/23/129/MS)	59 (Part) - Cont		Nicholas road has narrow paths, which make it particularly scary to walk down with children to school/ Romilly park/ the various halls that host scouting and children's clubs in the area, when traffic volumes and speeds are high (30mph + currently). Reducing the speed limit here will create safe routes for our children to use without fear of injury or worse. Broad Street has significant issues with boy racer types speeding along it. Reducing the speed limit along its length will restrict this anti-social behaviour. I often see pedestrians and vulnerable route users struggle to cross at the junction to Morrisons. This is due to high traffic volumes and speed. Reducing to 20mph will make it much safer for route users to cross. In general terms, reducing to 20mph will make it much safer for route users to cross. In general terms, reducing to 20mph will make a huge difference to people who already travel actively in the area, particularly vulnerable users, and will go a very long way to encouraging modal shift. I think making exceptions to these routes would have a detrimental effect on active route users and residents in these areas .	
(No Ref No.) Ffordd y Mileniwm (T/23/129/MS)	98	Yes	I am objecting to Ffordd y Mileniwm staying as a 30mph road. I can provide evidence through videos of the constant speeding on this road and near miss accidents on this road and vehicles going through red lights. As well as living on this Road , my daughter also attends st Baruc school, which has been built the same side of our house and I worry about cars that speed so close to the school, not just with the safety issues but the environmental factors as well.. Due to the open front of our property and our house being so close to this busy road, I often feel unsafe leaving my house and walking my 5 year old daughter to school. We have recently started to film the road and we are making numerous complaints to the police, so I can evidence the problems we are having. There are also numerous social media posts from other residents that are highlighting this problem. This is a dangerous road cars and bikes are already speeding, so perhaps if the speed limit is lowered this will give the police more power to act before there is a serious accident. I believe that speed bumps and road markings would be extremely beneficial on this road as well.	46
T/23/129/MS Gladstone Bridge	154	Yes	There is no segregation for cyclists or pedestrians at roundabouts on both ends of this section of road, meaning it does not meet WG guidance for an exception. It is also shorter than the 300 metre WG minimum guidance	46
T/23/129/MS Gladstone Bridge	155	Yes	stops. As a cyclist, I (and others) find the supposed cycle path along this stretch is not fit for purpose (doesn't meet active travel guidance, so cyclists are predominantly on the road with cars along this stretch	46
T/23/129/MS	160	Yes	Cory Way (part), Barry; Clos Tyniad Glo (part), Barry; Y Rhodfa (part), Barry; Heol Ceiniog (part), Barry Probably T/23/129/MS but access to the map with numbers closed before end of consultation The junction with Ffordd y Mileniwm for all these roads have high pedestrian and cyclist crossing, without	46

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/129/MS	160 (Cont)		provision/priority for active travel, therefore don't meet the WG guidance criteria/ yes to principal question A. The distance of approximately 40 metres is much shorter than the 300 metres WG minimum guidance.	
T/23/130/MS	62	Yes	The section from court road to Tynewyth road should be 20mph from the roundabout and west of, due to being by a nursery/daycare centre and busy sports ground. People park with little regard for others and 20mph would be more appropriate.	47
No Ref No. X: 311,741.598 Y: 168,627.343 T/23/130/MS	68 (Part)	Yes	Some of the exempt roads would not require an exemption (I.e Pontypridd road, Gladstone road) yet other roads like Trinity Street and Tynewydd Road would be impossible to drive at 20mph due to the steep incline; these should be exempt. This will just cause excessive emissions with people either stalling constantly or speeding in order to actually get up the hill. The whole 20mph roads is ridiculous anyway	47
No Ref No. (T/23/130/MS) Gladstone Rd	74	Yes	The full length of the A4055, Gladstone Road Barry should be 20mph. The section that is exempt includes the pedestrian entrance for the football club do there is a lot of pedestrian footfall during events. There is a flying start pre-school nursery also on that section of road.	47
No Ref No. (T/23/130/MS)	100	Yes	A4055 Gladstone Road, Barry - Map 67 - from the junction with Tynewydd Road to the roundabout on Cardiff Road, Barry Why will this stretch of road be classed as 30mph, an exception, following the introduction of the 20mph default speed limit for restricted roads from September 2023? This stretch of road has a Sports Ground, Adult Social Services Centre, a Flying Start Family Centre, a Police Station, the YMCA within a stretch of road of approximately 300 metres. There are also 3 Schools within the vicinity, more than 100metres away (from the South to North, Holton Road Primary School, St. Helens RC Primary School and Jenner Park Primary School) and children in the area attend a mix of these Schools with a number crossing Gladstone Road to do so. Perhaps it would be better for the 30mph exemption on Gladstone Road to end at where the houses (502 South side and 327 North side) start towards the eastern end of Gladstone Road with some road narrowing/ additional crossing refuge installed at this point to assist Adults and Children to cross this busy road at this point.	47
T/23/130/MS	162	Yes	all the side roads from Gladstone Road - Vere Street (part), Barry; Court Road (part), Barry; B4294, Court Road (part), Barry; Morel Street (part), Barry Sections of road are 30-40 metres, shorter than the 300 metres WG minimum guidance. Cyclists on the roads and crossings at junction with Gladstone Rd don't have pedestrian and cyclist priorities and therefore do not meet the WG guidance for exceptions	47

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
T/23/132/MS	132	Yes	The exception should end at mathew terrace as I don't believe the criteria set down by WG have been met as it goes into Dinas Powys. The route has over 20 properties per 1km meaning it should be 20mph. Plus The route is part of the proposed active travel route (VALE-SPR-Future-001D) which is short-term priority listed but will never be able to offer segregated cycleway protection meaning it will always have cyclists using the main carriageway as they do now. The section from Matthew Terrace towards the merry Harrie has a segregated shared path which then meets the 30mph criteria. It appears the proposal takes the minimum 100m criteria to a school to the max meaning the staff entrance is less than 100m away and the main entrance less than 150m away. It appears the bullet point "regularly used accesses to schools or hospitals are along the road, even though this may be more than 100m from their main entrances" appears to have been ignored as this clearly is the road used along its length to access the school. Finally, the order states "From the centre point of its junction with Brookside" Does this mean there will be a traffic island built in the middle of Brookside(on the bridge) to erect this signage? Otherwise, it will be incorrectly sign-posted. If this order is to go forward unchanged surely it has to be one side or the other of the Junction!	34
T/23/132/MS Gladstone Rd from Tynewydd to Vere St Roundabout	161	Yes	Gladstone Road is a key missing active travel link in the VoG's transport network. Half the road width is devoted to the storage of motor vehicles and there is no dedicated provision for cyclists. The answer to the principal questions in the WG guidance documents is yes for both A and B for this section of road, an on road cycle route - with the potential for a lot more cyclists if the speeds were lower and the road surface improved. The parked cars and the very poor road surface mean that cyclists have to use the middle of the lane (I commute on this road and it is dangerous despite its apparent width). This road also has a clear yes to more than one of the Place Criteria set out in the Welsh Government exceptions document.	47
T/23/132/MS	163	Yes	Cardiff Rd Cadoxton Laura St to Gladstone Rd/Vere St roundabout The answer to the principal questions in the WG guidance documents is yes for both A and B for this section of road, on road cycle route without dedicated provision and the potential for a lot more cyclists if the speeds were lower. It is another key missing link in the VoG active travel network as a main corridor between VoG and Cardiff. I commute (by bike) on this road and it's narrow and dangerous, with daily close passes at speed. It in no way meets the WG guidance for an exception.	48
No Ref No. (T/23/133/MS)	99	Yes	It makes no sense to put a 30mph exception from Cosmeston along Lavernock Rd up to the entrance to Castle Avenue. It should be 20mph just after the EGO restaurant. I would love someone to explain the logic of planting hundreds of metal sign posts into an already cluttered urban environment. Surely VOGC could have just put a 20mph sign on the entrance to Penarth from Cardiff, one at the entrance to Lavernock Rd from Sully, and one	49

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
No Ref No. (T/23/133/MS)	99 (Cont)		from Dinas onto Redlands Rd. Now everywhere I go I see all these extra posts. You're consulting now when you've clearly already made your decision. That's why you've installed extra posts on the entrance to Chantry Rise where you can't possibly drive at 30mph anyway. To allow for your exemption on that tiny stretch of road. I am just appalled at the amount of money being wasted on this. You could have just zoned all of Penarth as 20 and saved what must be hundreds of thousands on signposts and additional repeater signs everywhere.	
T/23/133/WS	106 (Part)	Yes	Lower Windsor Road is a hazardous commuter route lined with parked vehicles with extreme air pollution. When not totally congested residents and pedestrians are subject to dangerous speeding vehicles. This road should not be excepted and certainly should be subject to 20mph. Schemes should be devised to enhance safety, public transport and active travel.	49
T/23/133/WS	110	Yes	Although I am a car owner living in Penarth, I see no reason to exempt Lavernock Road from the 20 mph speed limit. It is a heavily residential road and this who live on it deserve - as do residents on other streets in Penarth the benefits that follow from a 20 mph limit: less pollution and noise and improved safety.	49
T/23/133/MS	125	Yes	B4267 Lavernock Road (part) Penarth - an exemption is proposed south of the junction with castle avenue and Augusta road for 1376 (to beyond the entrance to Cosmeston Park). I do not think this section of road should be exempted from the 20 mph limit. VOG have not put forward a reasoned case why this road should be exempted and remain at 30 mph. It's a residential area	49
T/23/133/MS	131	Yes	The exception should end at the Penarth boundary as the segregated shared cycle path (VALE-SPR-0021) ends at this point forcing cyclists to use the road. I don't believe the council has considered the number of people crossing the road to the Bus stop (Golf Club) which has no footpath with the entrance into the bus shelter directly onto the road! While this wouldn't be allowed now it exists and as such should receive the same 20mph protection offered through this legislation for walkers having to cross the road to the bus stop. There are also more than 20 forward-facing properties per 1km towards the end of the exception which appears to have been ignored. All of this means it fails many of the Welsh Government A and B questions and "Protected facilities for pedestrians and cyclists" appear to show that this part of the road should be 20mph	49
T/23/133/WS	137	No	I would like to see the proposed 30mph route extend along al of Lavernock and Redlands Rd as it a main route through Penarth, to allow the flow of traffic through	49
T/23/133/WS	141	Yes	Can you clarify why the the B4267 from the Westbourne Road junction up to Castle Avenue is an exception to the 20mph limit? The road does not change in nature before or after the junction with Castle Avenue. The road is in a residential area with significant pedestrian numbers using the adjacent pavements, in particular as a primary walking route to primary and secondary schools, including pedestrians from the houses in the	49

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
No Ref	49	Yes	Skomer Road is painfully slow at 20mph. It is wide and barely has any pedestrian activity yet it is 20mph. Skomer Road should remain at 30mph. This road also has a Gosafe camera at the bottom of the hill it is sadly going to catch many people who are going a perfectly safe limit for that road. These are innocent people now who have been driving safely at 30mph who are going to get caught out. Colcot Road should not be 20mph. You can easily and safely drive at 30mph. Jennifer Road is also a wide road where you can easily stick to 30mph safely. Severn Avenue is also another road that should not be 20mph. 30mph is perfectly safe. Claude Road is another road that should not be 20mph. You can easily and safely drive on that road at 30mph. Broad street from the roundabout near Morrisons up until the set of traffic lights leading to the good sheds should be 30mph. It is an easy and safe road to drive at 30mph. We have been driving at 30mph for a long time safely. No one wants to make their commute even worse than it is now. 20mph is in place just to make people miserable. People should be able to protest against 20mph roads because no one wants them the way you and the rest of Wales are introducing them.	50
No Ref	58	Yes	driving on 20mph on all roads is a awful idea and needs to stick with 30mph as it will cause more problems such as overtaken, people going to work late, taxis taking a passengers to a destination from A to B a lot slower leading to higher cost to of taxi travel	50
No Ref No. Description Only - Redlands Rd, Penarth,	60	Yes	Redlands Road is a main commuter route. It is hilly and takes concentration to keep to 30mph on the downhill parts. Moving to 20mph will mean excessive concentration on the speedometer and less scanning of the road and pavements ahead. The brakes will be constantly on leading to inconsistent driving and poor interaction with other road users. This road is wide with very good visibility. Is there evidence that there are excessive accidents on this road? A general comment is that the blanket use of 20 mph zones means that the effect of lowering speed limits in vulnerable areas, such as schools, is no longer effective. This could lead to more accidents as you no longer pay greater attention in these areas.	50
No Ref No.	67	Yes	Absolutely stupid...will cause more omissions and congestion...Drakeford is an idiot...how is this a good idea ? Ridiculous..will cause congestion...more use of fuel....more omissions...drakeford needs to go	50
No Ref No.	69	Yes	Reject this idiotic idea. It is shambolic and should not be enacted. Grow a back bone and fight this ludicrous law	50
No Ref No.	71	Yes	It is totally unacceptable and unnecessary if 30mph was adhered to 20 mph would cause more problems than safer roads, but would dramatically increase the income for speeding fines	50

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
IF 967 (No Ref No.)	72	Yes	Lowering the speed limit on the proposed roads will cause more congestion therefore increasing emissions. I travel across Barry to my place of work and to two different schools every week day and cannot see how 20mph limits will benefit anyone!	50
No Ref No.	73	Yes	What are costs - who is funding- are we just following Dictatorship (WAG) , many other councils have rejected on actual facts and historical data Increased pollution (proved) , damage to environment (proved) , unnecessary, waste of public funding, dictatorship	50
IF 967 (No Ref No.)	75	Yes	Cycling's lethal around Barry. I live near Dock View Road and vehicles fly down there. Speed kills	50
No Ref No.	76	Yes	Disprove of the changes and believe the slower limited will lead to more fines and frustrated drivers. War against the motorist needs to end	50
No Ref No.	77	Yes	Ridiculous idea, creating traffic issues and idling cars meaning more pollution in areas not currently experiencing issues. The Welsh government are strangling this country. I'm ashamed of them	50
No Ref No. (All)	79	Yes	Absolutely rediculous To informed 20mph would cause tailbacks & accidents in all 30mph limits	50
No Ref No.	92	Yes	Driving for work is hard enough without having to watch your speed every second Will cause more accidents where people are watching their speedometer	50
IF 967 (No Ref No.)	93	Yes	This will cause chaos and the potential for more fines to the common person who is trying to survive in an unbalanced society. Your eyes will be more focused on the speedometer than the roads? Causing more accidents.	50
IF 967 (No Ref No.)	96	Yes	I am happy to except 20mph zones around schools but the reasoning behind the roll out of many more 20mph roads and lowering speed limits to reduce air pollution doesnt stand up and as for your cute video explaining explaining how we can now hop safely onto our bikes to cycle our children to school and then on to work is is frankly laughable ,for example , daily at all times of day and night with my work hardly any , maybe a couple a day at most , a total waste of money and effort but probably funded by Europe so thats ok then ! This utopian world the Senydd dreams about doesn` t and will not exist , your decimating our tourist industry already with your ill concieved idea that forcing holiday home owners to pay up 300% over the council tax will force them to sell their property to a local , whom on the whole works in the tourist industry that is being squeased with less and less holiday accomadation thus forcing food outlets , shops etc to close , the pay for these jobs will not cover a mortgage on the value of these properties so another non Welsh home owner who can afford the house and the	50

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
IF 967 (No Ref No.)	96 (Cont)		the added charges will just buy it , hmm really helping the lcal there arent we , maybe you should stop selling off social housing and start investing in building new affordable homes for locals who live and work in those communities . Although forcing our visitors to drive slower and take longer to travel to these destinations , will with luck more than likley manage to get them a speeding fine or two for there troubles , that will add to the council coffers . Doesnt the example of the car park known as M4 Newport to Camarthan strech tell you that driving slowly with idling raises emmission , our roads in Wales are underfunded ,shockingly so in most areas , the actual people that need to curb their speed are sadly the ones that wont give to figs o obey the new rules as they dont to the present speed limits anyway . Accidents are more than likley to rise as frustration sets in due to time wasted sitting around adding to a persons working day , bus services are being cut ,train services as well , costs for these are also on the up , we are mostly all working harder for less money , these measures dont seem to be thought through properly with a full consultation with the Welsh public who actually vote you in to your very well paid jobs . Yes we need to look at the future and how we can control our enviromental issues but this is a step way too far for most of the residents of Wales , put it to a full national vote if you dare .I`m sure there will be some reson that prevents that but judging by the conversations I have had over the past three years since COVID, if there were a referendum called now as to keeping or scrapping the Senydd you`d all be looking to get on your bikes and cycling to job interviews	
IF 967 (No Ref No.)	97	No (Yes)	Terrible idea. My vehicle, like make others will be screaming in 2nd gear at 20mph. Its counter productive. 30mph the revs are much lower and allow me to get into a higher gear.	50
No Ref No.	101	No	I agree to reduce the speed limit, most people have large cars its safer for pedestrian's also less pollution. Electric cars are so quiet you can't hear them until they get close to you. Roads are getting busier also causing bottle necks in penarth. Roads very difficult for school children also older people to cross, its a challenge	50
No Ref No.	107	No	I can only comment on our area here in Dinas Powys. There are several other urban areas in the Vale where it is essential for safety, schools, parked cars, children and the elderly The lower end hill of Penyturnpike Road on the junction with Millbrook Road and leading up Mill Road should be 20mph. The traffic calming measures on this section are just not working	50
No Ref No. (Llantwit Major)	111	Yes	This country has used the motor car almost exclusively for 50 years or more. Nearly everyone has to use a motor vehicle to get to their place of work, or to reach the increasingly common supermarkets and out of town shopping areas and for many to get their children to school. for others access to hospitals are only via the motor car. I wholly agree the housing estates should be 20mph, or even 10mph in some modern compact	50

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
No Ref No. (Llantwit Major)	111 (Cont)		estates. However i believe the many arteries within a village or town should remain at 30mph. In Llantwit Major those roads would be: Boverton Road, from Boverton to the library roundabout - then 20mph past the shops. Llanmaes Road. Eagleswell Road. High street, which should also have all its speed humps removed	
IF 967 (No Ref No.)	119	Yes	I have chosen yes to question 5 however I think it would have been better to have multiple options rather than a simple yes or no. I personally think the plan is confusing as small sections of road are going to change but there isn't much detail on the rest of the roads. For example if a road is 30mph then suddenly changes to 20mph then back to 30mph in a short space of time this could easily confuse some drivers, make people slow abruptly causing issues with traffic behind and also there could be a problem with drivers concentrating so much on the speed limit signs rather than the road ahead; this could be dangerous. I think that all side roads and outside schools should be 20mph but I believe other main roads should be 30mph to keep traffic flow moving, maybe speed humps or other speed calming measures would be an option rather than just a speed limit sign.	50
No Ref No.	133	Yes	This is absolutely ridiculous and should not be allowed to be implemented. This has nothing to do with carbon reduction whatsoever. I don't consent to these ridiculous road speed limit changes. Around schools yes but this going one step too far.	50
No Ref No.	134	Yes	Don't agree with these restrictions on the roads whatsoever. Data shows this is nothing to do with carbon emissions and reduction.	50
IF967 (No Ref No.)	147	Yes	It is important that the Statement of Reasons in any TRO provides adequate information as to why the change should be made. In the case of setting a speed limit 50% higher than the national limit for such a restricted road then this is especially true to ensure correct duty of care for vulnerable road users and meet the requirements of the The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. In Schedule 2 2(d) this requires "a statement setting out the reasons why the authority proposed to make the order". "The Statement of Reasons within this TRO fails to adequately give reasons why the restricted roads in question should have a 30mph limit. The statement merely says "The Council as Local Highway Authority considers that these roads are strategic routes with higher volumes of daily traffic compared to urban residential streets and as such do not meet the criteria or the nature of a road with a speed limit of 20 mph. The Council considers that the existing 30 mph speed limit is an appropriate speed limit in order to maintain a reasonable traffic flow on higher traffic volume strategic routes." Whilst the status of being "strategic routes with higher volumes of daily traffic" is dubious in not being evidenced in any way, this is a status of a route rather than a section of a road.	50

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
IF967 (No Ref No.)	147 (Cont)		<p>Regardless of such a classification, many of the sections of road where an increase to 30mph is being sought are short stretches at the periphery of settlement which will have a 20mph limit throughout. On a logical basis if a settlement has a 20mph throughout its roads, including the so called strategic route, then allowing increased speeds on short sections at the periphery will not make any difference to traffic flow. The benefit within the "reason" of maintaining traffic flow is not a deliverable outcome. Traffic Authorities only have the ability to set a local speed limit to vary it from the national speed limit. As 20mph is already the national limit for restricted roads then the only roads where a 20mph limit may be set are where there is a national 60mph limit which applies to non-restricted (unlit) roads and the Traffic Authority wishes to set it lower than 60mph. The Statement of Reasons should also provide evidence of the resultant balance between the benefits of the change and the status quo. As the status quo after 17th September is a 20mph limit for such roads then no inclusion has been made of the disbenefits of a change to 30mph on so many of the other responsibilities in setting speed limits. These include a taking full account of the needs of vulnerable road users as referenced in both the Circular 24/2009 3.10 "The needs of vulnerable road users must be fully taken into account" and the guidance on be fully taken into account" and the guidance on setting exceptions (2.1.3) to a 20mph limit which requires "robust and evidenced application of local factors" that indicate a speed limit other than 20mph is appropriate. This has not been provided in the Statement of Reasons. Furthermore the guidance states (2.2.11) that Where their decision deviates from this guidance highway authorities should have a clear and reasoned case" The foundation of the guidance on setting exceptions also states that it aspires for "a maximum road travel speed 30km/h (20mph) in areas where vulnerable road users and vehicles mix in a frequent and planned manner, except where strong evidence exists that higher speeds are safe". Whilst we agree with the concept of exceptions to the national speed limit of 20mph and setting a higher limit, the requirements of both the guidance specifically in the Exceptions Guidance and also generally in the 24/2009 guidance require evidence, sound reasons and full account of the needs of vulnerable road users. These have not been provided within the Statement of Reasons for the TRO. The consequence of this is both a potential misdirection of council members in approving such a TRO and also the potential subsequent challenge of the legality of the TRO. There are also further implications regarding meeting Nolan Principles (in particular "Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias."). How can this be done if evidence is lacking and the lack of consideration of vulnerable road users discriminates against them. I addition a consideration should be made of the legal liabilities in event of any speed limit being set inappropriately higher than the national 20mph limit for restricted roads. We therefore</p>	

** Refers to the 7th September 2023 Cabinet Report

Plan Reference	Respondent Number	Objection (Yes or No)	Representations	Officers Response Ref Number**
IF967 (No Ref No.)	147 (Cont)		believe that the TRO is flawed and fails to meet the duty of care required when setting alternative and higher speed limits as indicated in the above laws, regulations and guidance referenced. It should be withdrawn and re-considered.	
(No Ref No.) T/23/12/MS??	156	Yes	A section of road with a high volume of pedestrian and cycle use - including crossing the road (yes to principal question A) and poorly designed junctions at the side roads without priority for cyclists or pedestrians that makes it dangerous to to make this a exception.	60

** Refers to the 7th September 2023 Cabinet Report

Amend the following lengths of road covered by a 20 miles per hour speed restriction within Schedule 2 of the proposed Order:

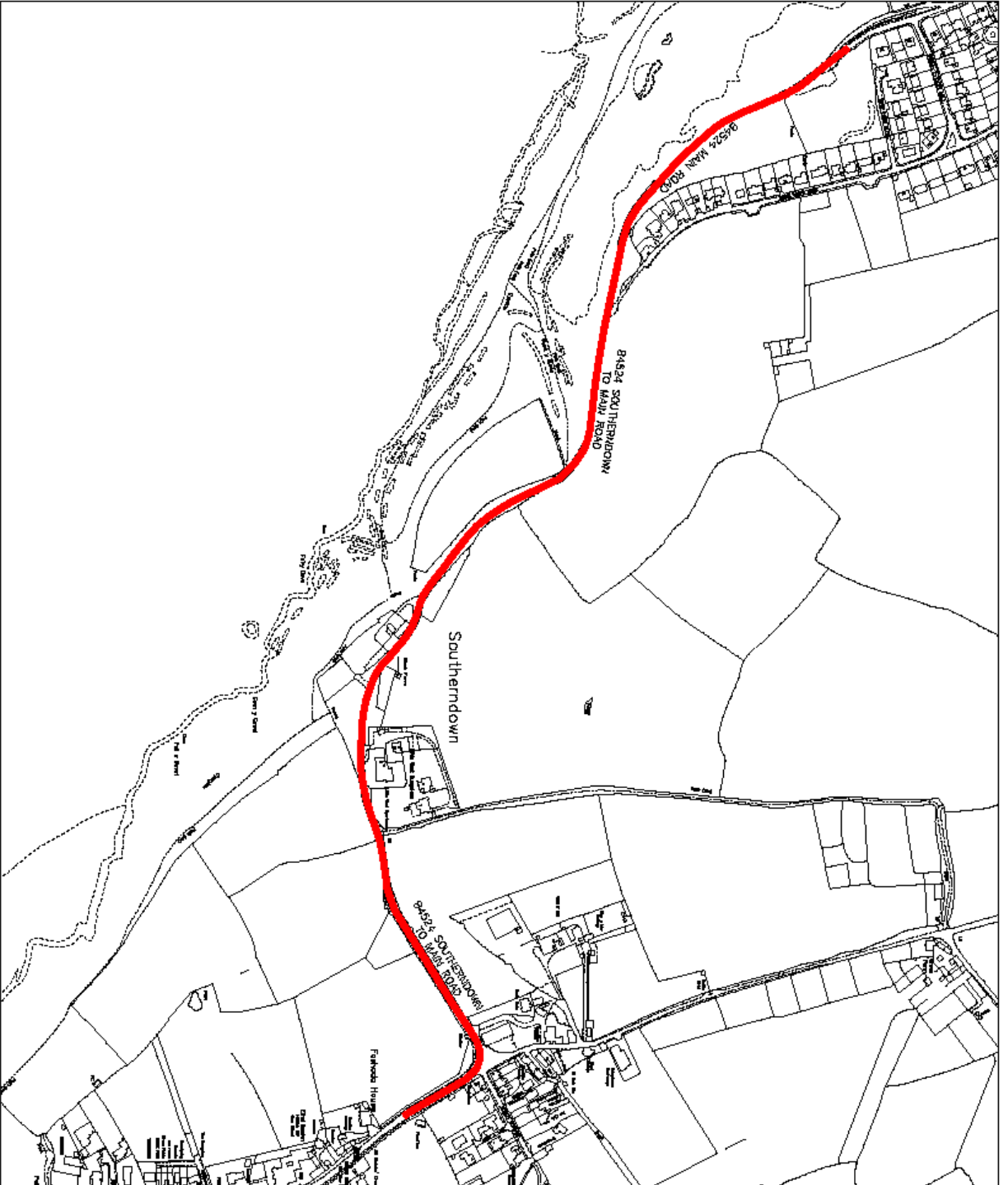
Ogmore-by-Sea and Southerndown Area

West Farm Road (part), Ogmore-by-Sea

Remove in its entirety:

From its junction with the B4524, Main Road, in a north-westerly direction for a distance of approximately 135 metres.

(Drawing T/23/96/MS has been revised to drawing T/23/96A/MS to reflect this change – see below).



NOTES:
 Drawing not to scale refer to
 accompanying schedule for accurate
 dimensions.

KEY
 Proposed 30mph Speed Limit Order

Green copyright and mistake rules apply
 Green carry liberties
 Green Part 4 roads/previous crown lands rules

NO	DATE	DESCRIPTION	BY	CHKD

VALE OF GLAMORGAN
 ENVIRONMENT AND HOUSING
 SERVICES

BRO MORGAN
 ENGINEERING

The Vale of Glamorgan Council

Agreed by Sae & Southerndown

Contract Title	Proposed 30mph Speed Limit Order
Client	The Vale of Glamorgan Council
Project No	1937
Drawing No	1/23/2016/MS
Scale	As Shown
Date	1/23/2016

Amend the following lengths of road covered by a 30 miles per hour speed restriction within Schedule 3 of the proposed Order:

Barry Area

A4050, St Nicholas' Road (part), Barry

Remove in its entirety:

From its roundabout junction with Park Road and Porthkerry Road, southwards and south-eastwards, to the centre of its junction with the A4055, Harbour Road, a distance of approximately 577 metres.

A4055, Park Avenue (part), Barry

From its junction with Romilly Park Road and the A4050, St Nicholas' Road, north-eastwards to its junction with Harbour Road, a distance of approximately 205 metres.

A4055, Broad Street (part), Barry

From its junction with Harbour Road, north-eastwards to a point 8 metres southwest of its junction with Canon Street, a distance of approximately 220 metres.

A4055, Harbour Road (part), Barry

From its junction with the A4055, Park Avenue, southwards and contiguous with the existing 40mph speed restriction, a distance of approximately 235 metres.

Amend to:

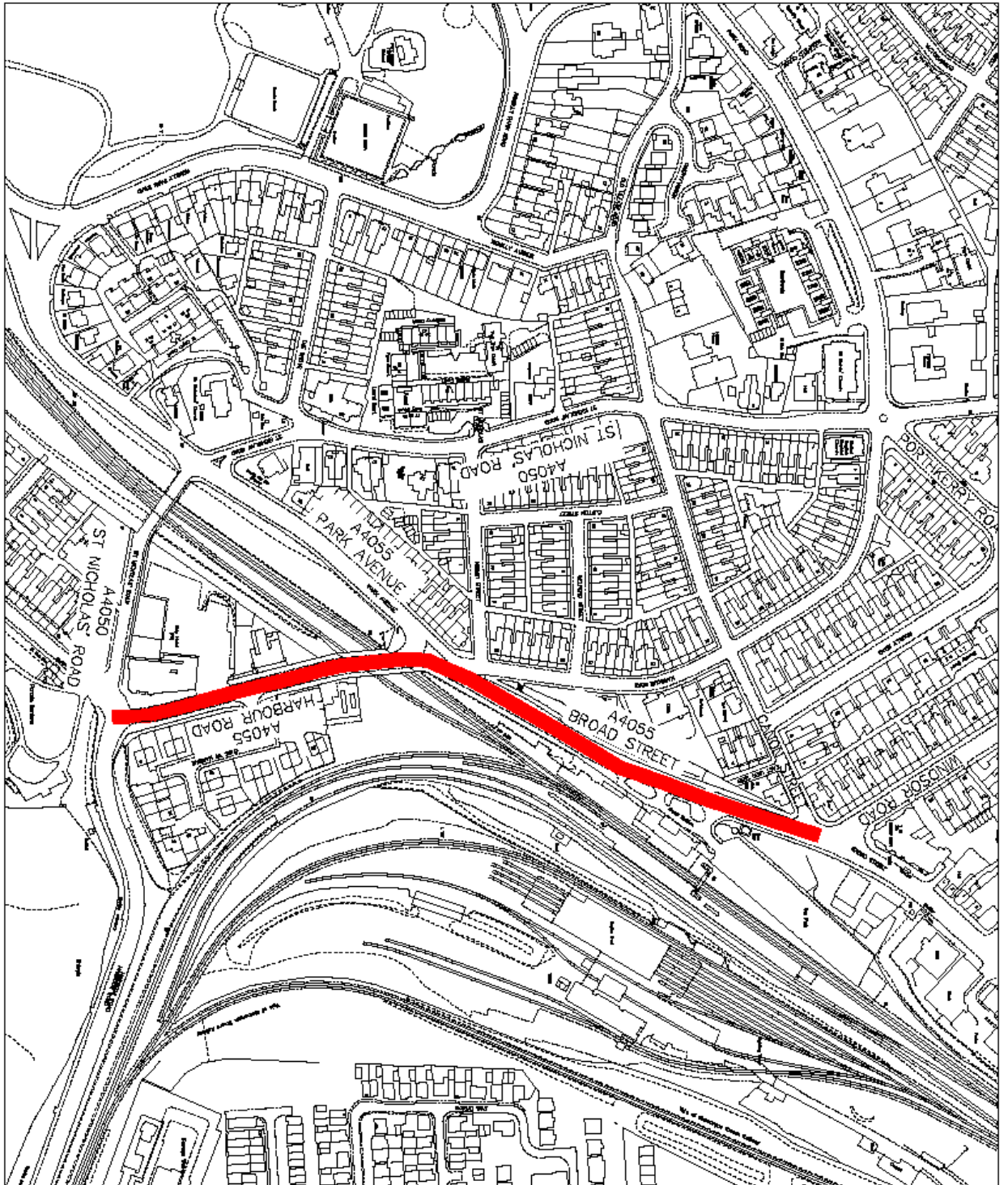
A4055, Broad Street (part), Barry

From its junction with the convergence of the A4055, Harbour Road and Park Avenue, north-eastwards to a point 16 metres southwest of the centre of its junction with Windsor Road, a distance of approximately 238 metres.

A4055, Harbour Road (part), Barry

From its junction with the convergence of the A4055, Broad Street and Park Avenue, southwards to its junction with the A4050, St Nicholas' Road, a distance of approximately 217 metres.

(Note: drawing T/23/128/MS has been revised to drawing T/23/128A/MS to reflect this change – see below).



NOTES:
 Drawing not to scale refer to accompanying schedule for accurate dimensions.



KEY

Proposed 30mph Speed Limit Order

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VALE OF GLAMORGAN
 ENVIRONMENT AND HOUSING SERVICES

BRO MORGANNWG
 ENGINEERING

The Vale of Glamorgan Council
 Barry

Project Title	Proposed 30mph Speed Limit Order
Client	The Vale of Glamorgan Council
Project No.	1/23/128/186
Issue No.	1/19/87
Issue Date	1/19/87
Issue Description	
Issue By	
Issue For	
Issue To	
Issue Status	

Dinas Powys Area

Cardiff Road/Barry Road (A4055) (part), Dinas Powys

Remove in its entirety:

From the centre point of its junction with Brookside, in a general eastwards and then north-eastwards direction for a distance of approximately 1107 metres.

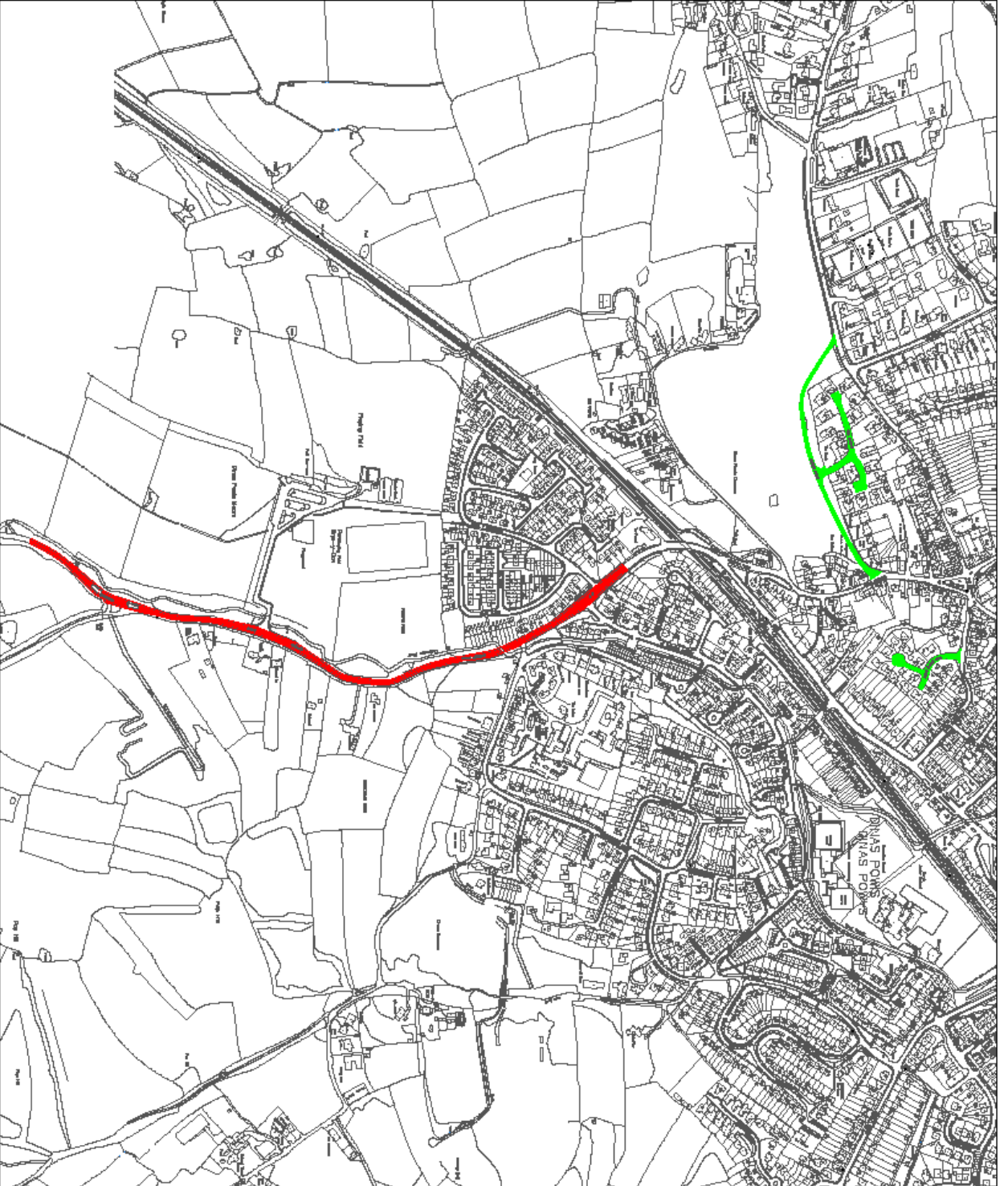
From a point approximately 20 metres south-west of its junction with Elm Grove Road, in a general south-westwards and then southwards direction for a distance of approximately 1581 metres and contiguous with existing 40mph speed limit.

Amend to:

From a point approximately 78 metres north-east of the boundary line between properties 1 and 2 Matthew Terrace, in a north-eastwards direction for a distance of approximately 309 metres.

From a point approximately 51 metres north-west of the centre of the junction with Heol y Frenhines, in a general south-eastwards and then south-westwards directions for a distance of approximately 1002 metres and contiguous with existing 40mph speed limit.

(Note: drawings T/23/110/WS and T/23/111/WS have been revised to drawings T/23/110A/WS and T/23/111A/WS to reflect this change – see below).

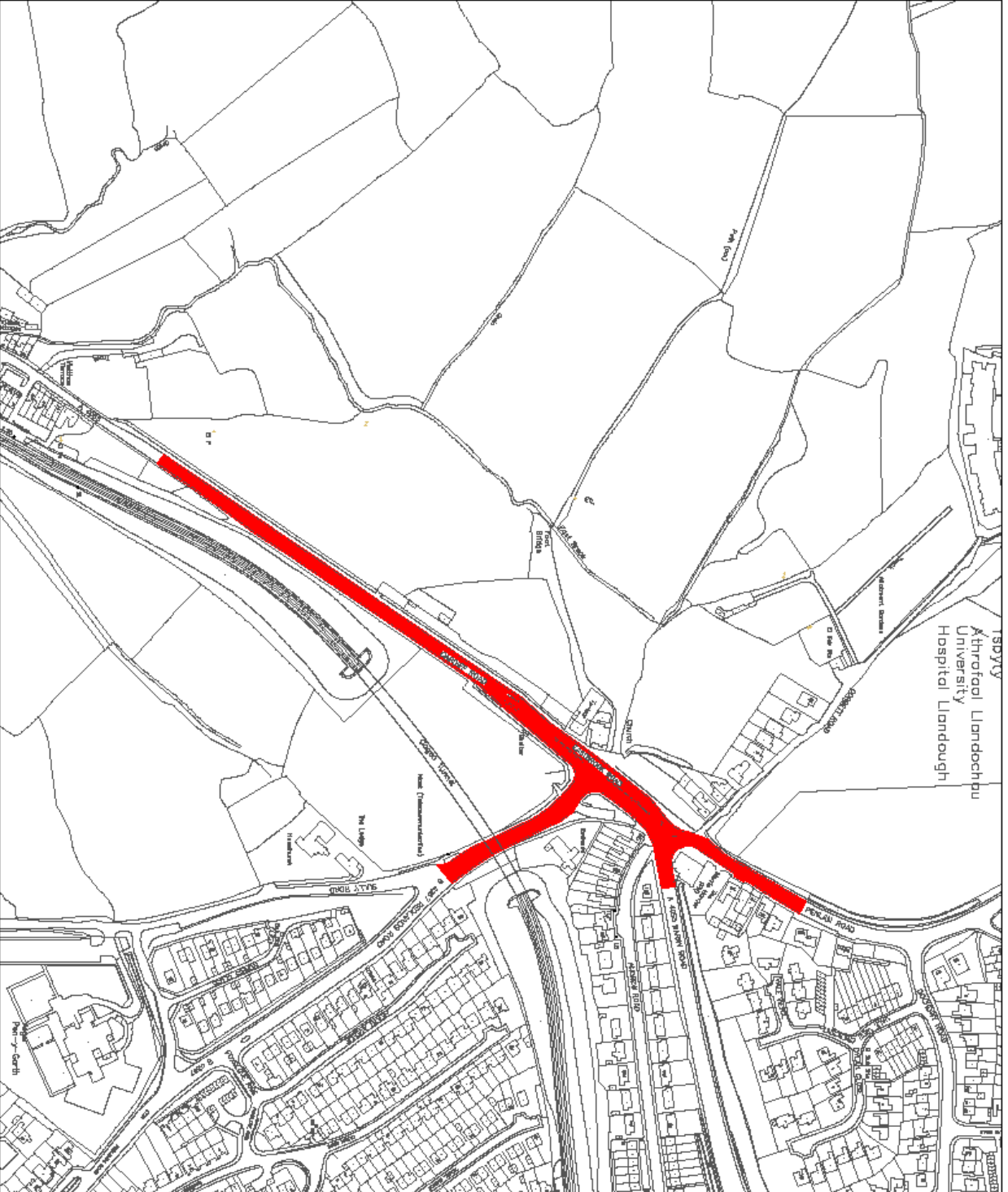


NOTES:
Drawing not to scale refer to accompanying schedule for accurate dimensions

KEY
█ Proposed 30mph Speed Limit Order
█ Proposed 20mph Speed Limit Order

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<p>VALE OF GLAMORGAN ENVIRONMENT AND HOUSING SERVICES</p>	
<p>EA ENGINEERING</p>	
<p>Client: The Vale of Glamorgan Council</p>	
<p>Project: Dinas Powys</p>	
<p>Contract No: Proposed 30mph and 20mph Speed Limit Order</p>	
<p>Issue No: 1</p>	<p>Date: 15/06/2023</p>
<p>Drawn By: [Name]</p>	<p>Checked By: [Name]</p>
<p>Scale: 1:1000</p>	<p>Project No: 15867</p>
<p>Sheet: A</p>	<p>Date: 15/06/2023</p>



TSDPY
Atrrofael Llandochau
University
Hospital Llandochau



NOTES:
Drawing not to scale refer to
accompanying schedule for accurate
dimensions.

KEY
Proposed 30mph Speed Limit Order

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VALE OF GLAMORGAN
ENVIRONMENT AND HOUSING
SERVICES

BRO MORGANWIG
ENGINEERING

Client: The Vale of Glamorgan Council
Project: Kerris Harrier Junction
Parish: Dinas Fawys & Llandochau

Proposed 30mph
Speed Limit Order

Issue No: 1
Issue Date: 18/07/2022
Drawing No: V23/111/VW6
Scale: 1:1

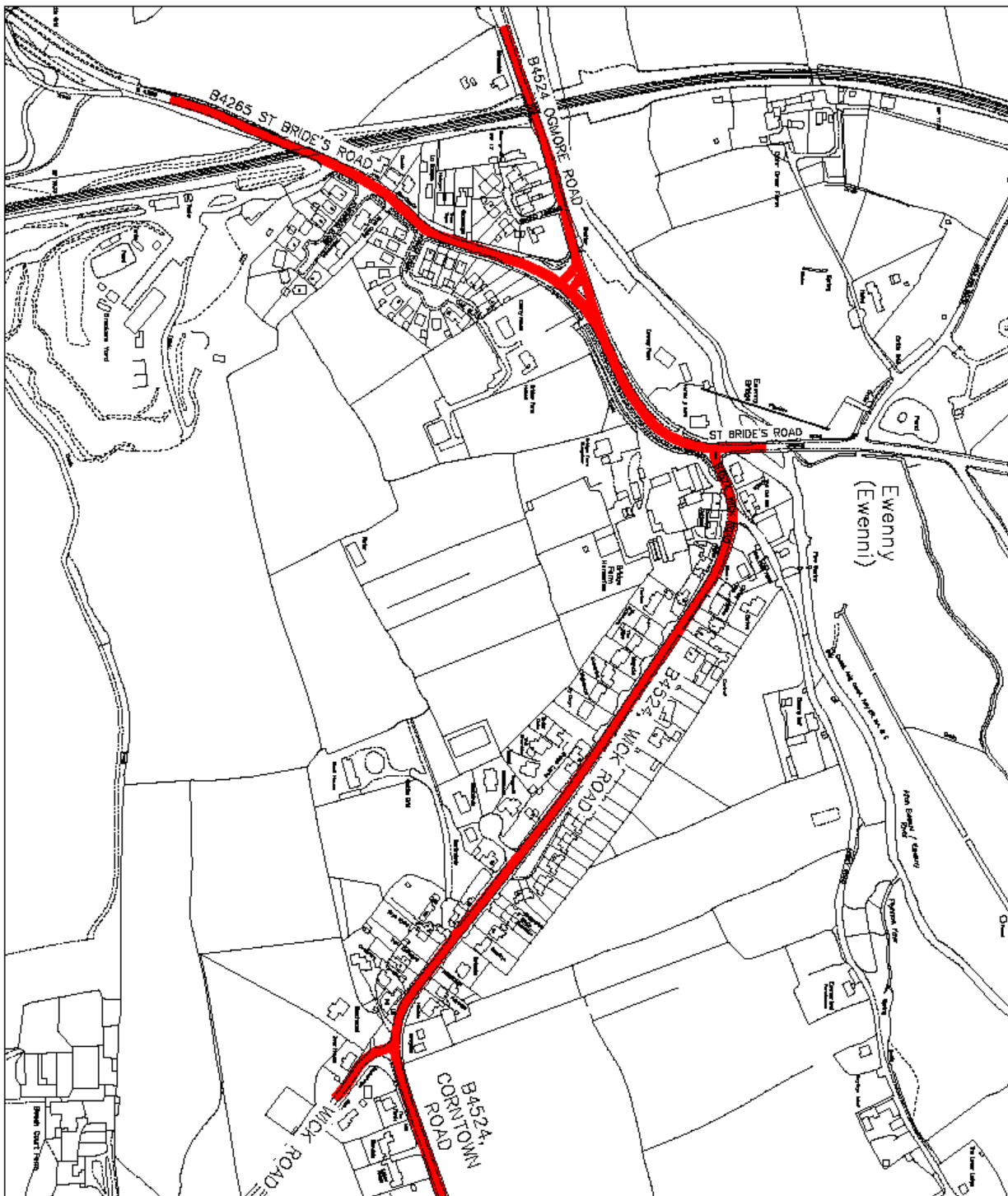
Corntown and Ewenny Area

Ewenny Cross, Ewenny

Remove in its entirety:

From its junction with the B4524, Ogmore Road, throughout its entire length.

(Note: drawing T/23/126/MS has been revised to drawing T/23/126A/MS to reflect this change – see below).



NOTES:
 Drawing not to scale refer to
 drawings for accurate dimensions

KEY

Proposed 30mph Speed Limit Order

From government and private roads 2003
 Government v. Bann & New from data 2012
 Access Ordnance Survey

NO.	DESCRIPTION	DATE	BY

VALE OF GLAMORGAN
 ENVIRONMENT AND HOUSING SERVICES

PRO MORGANWG
 ENGINEERING

The Vale of Glamorgan Council

Ewenny

Contract Title	Proposed 30mph Speed Limit Order
Project No.	11687
Drawing No.	V32/12/005
Scale	
Author	
Checked	
Date	

Penarth Area

Remove in its entirety:

Cogan Hill (A4160) (part), Penarth

From a point approximately 65 metres south-east of the centre point of its junction with Barry Road, south-eastwards to the centre of its junction with Andrew Road for a distance of approximately 265 metres and contiguous with existing 40 mph speed limit.

Cogan Hill Roundabout, Penarth

Will be subject to a 30mph speed limit for its entire length, a distance of approximately 58 metres.

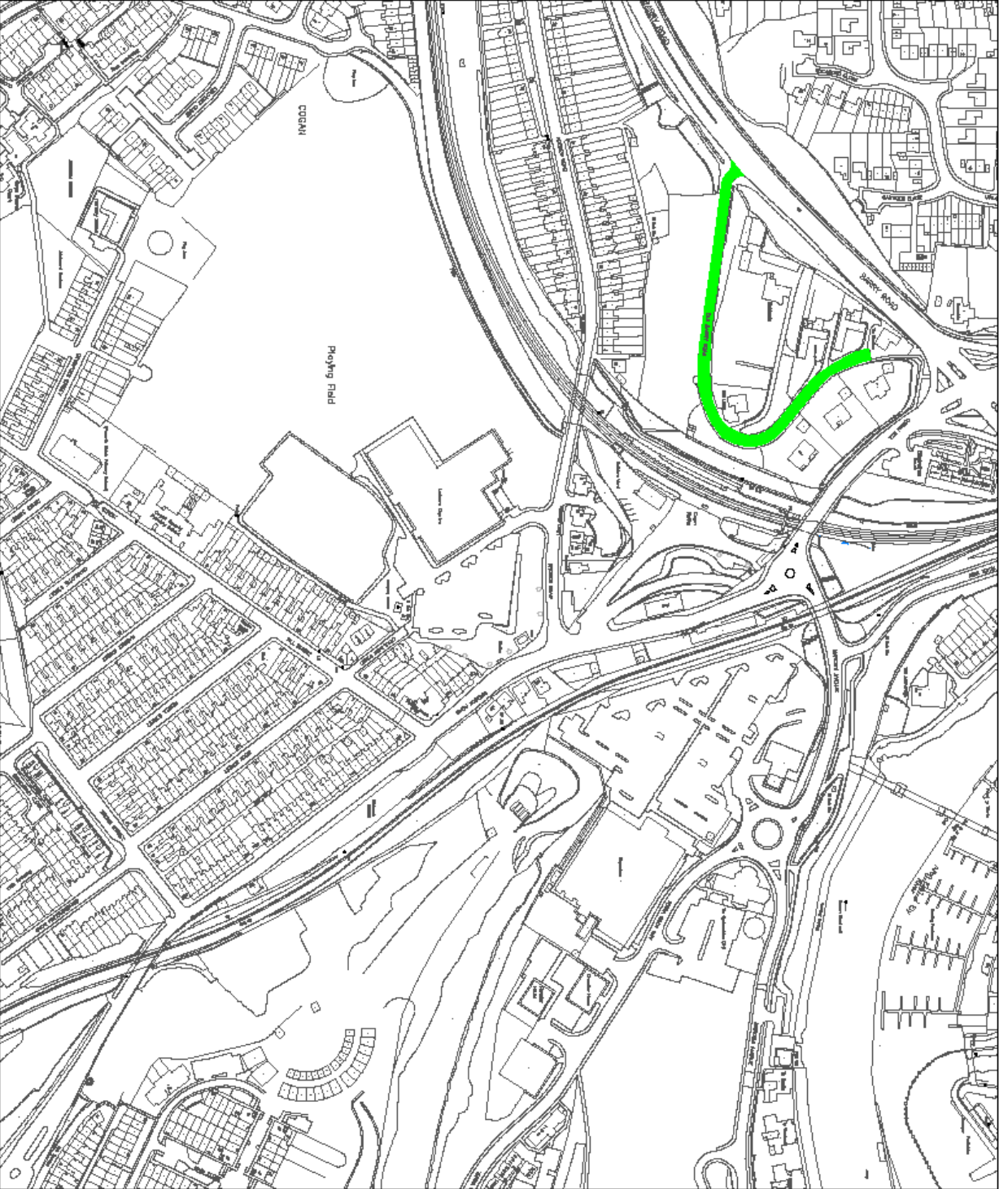
Windsor Road (A4160) (part), Penarth

From the centre point of its junction with Andrew Road, south-eastwards for a distance of approximately 437 metres.

Marconi Avenue (part), Penarth

From the centre point of its junction with Cogan Hill roundabout, north-eastwards for a distance of approximately 35 metres.

(Note: drawing T/23/109/WS has been revised to drawing T/23/109/A/WS to reflect this change – see below).



NOTES:
 Drawing not to scale refer to
 accompanying schedule for accurate
 dimensions.




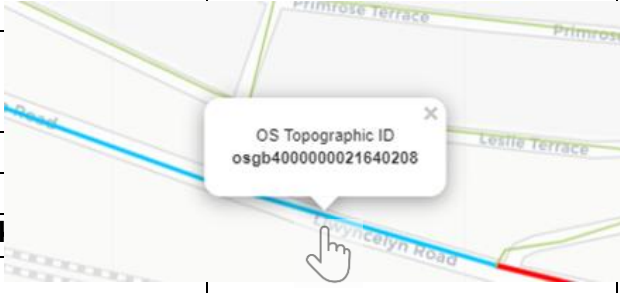
KEY

- █ Proposed ERMH Speed Limit Order
- █ Green boundary and shelter - White area
- █ Boundary of Green Space - Dotted line
- █ Half width of Green a boundary cross the date 2003
- █ Arched Dotted 100000000

VALE of GLAMORGAN
 ENVIRONMENT AND HOUSING SERVICES

BRO MORGANNWG
 ENGINEERING

Client		The Vale of Glamorgan Council	
Project		Pannith	
Drawing Title		Proposed ERMH Speed Limit Order	
Drawn By	Scale	Project No.	Issue No.
Checked By	1:1	17887	1
Author	MR	Project No.	17887
Issue	1	Issue No.	1
Scale	1:1	Issue No.	1

 TRAFNIDIAETH CYMRU TRANSPORT FOR WALES			
20mph exceptions process - feedback			
Organisation name:	Vale of Glamorgan Council		
<p>The html versions of the issued maps have unique Ordnance Survey Topographic IDs (TOIDs) attached to each of the colour-coded road links. These can be found by selecting the link, as shown in the example above. Please refer to these TOIDs in your feedback. Examples of corrections might include incorrect speed limits or requests to remove or add an exception based on local knowledge. If you are unable to view the issued html version then please email gis@tfw.wales to request pdf copies, which can then be annotated and returned.</p>			
#	TOID	Correction required	Additional comments
1	Between osgb40000000216 16696 to osgb40000000216 16687	Change to exception; retain at 30mph; requires new TRO.	A48 through St Nicholas: Place criteria met and 2.1.3A negative as limited ped/ cyclist conflict along across the road; 2.1.3B negative as generally 2m wide fooways provided and controlled crossing point at Dyfryn Lane & uncontrolled pedestrian crossing point on eastern entry. Also future active travel scheme propped subject to funding.
2	osgb....20958318	No correction ; retain as default to 20mph.	Aberthin Road A4222 - traffic signals to immediatelly beyond school frontage: Place criteria met and 2.1.3A positive; 2.1.3B positive as footway provision substandard and school environmnet.
3		Change to exception; retain at 30mph; no system of street lighting therefore no TRO required.	Maendy Road A4222 through Maendy village: Place criteria not met and 2.1.3A negative.
4		Check extent of default 20 and restricted road status.	Side Road Maendy to Prisk - query TRO and speed limit signage to assess imact on 20mph default

5	osgb....21662327	Change to exception; retain at 30mph; requires new TRO.	Ystradowen A4222 through Ystradowen village: Place criteria met and 2.1.3A negative as limited ped/ cyclist conflict along across the road; 2.1.3B negative as generally good 2m wide fooways provided and controlled crossing point at Tymawr Close & uncontrolled pedestrian crossing point north of Ashgrove.
6	osgb.....21637370 to osgb.....20944412	Retain as default 20mph; Extend 30mph exception Primrose Hill as buffer approx 165m; western side Westgate no buffer required due constraint of highway alignment.	A4222 High Street, Eastgate & Westgate: Place criteria met and 2.1.3A positive as high frequency of ped/ cyclist interactions likely in TC environment; 2.1.3B negative as generally good 2m wide fooways provided and controlled crossing points. Therefore retain as default 20mph.
7	Colcot Road	Retain as default 20mph.	A4050 Colcot Road full length: Place criteria met and 2.1.3A positive as high frequency of ped / cyclist crossings / interactions during school / college opening and closing times; 2.1.3B negative as generally good 2m wide fooways provided and controlled crossing points on route to school / college sites.
8	Aberthin village	Anerthin - review 20mph trial speed limit.	A4222 Aberthin - review trial outcome to determine speed limit through village. MS to progress ATC's Autumn 2022.
9	Jenner Road	Retain as 20mph default	A4050 Jenner Road: Place criteria met and 2.1.3A positive as likely high frequency of ped / cyclist crossings / interactions during school opening and closing times (numerous schools in vicinity) plus location of location of Margaret Alexander CC; 2.1.3B negative as generally good 2m wide fooways

				provided and controlled crossing points at key locations.
1 0	Park Crescent	Retain as 20mph default		A4050 Park Crescent: Place criteria met and 2.1.3A positive as likely high frequency of ped / cyclist crossings / interactions during school opening and closing times plus local shopping centre / high street environment; 2.1.3B negative as generally good 2m wide fooways provided and controlled crossing points at key locations.
1 1	St Nicholas Road	Change to exception; retain at 30mph; requires new TRO.		A4050 St Nicholas Road: Place criteria met and 2.1.3A negative limited ped/ cyclist conflict along across the road and diluted usage for school access compared with other roads in the area; 2.1.3B negative as generally good 2m wide fooways provided uncontrolled crossing points at eiether end of road.
1 2	Harbour Rd & Park Avenue	Change to exception; retain at 30mph; requires new TRO.		A4050 Harbour Rd & Park Avenue - as St Nicholas Road above.
1 3	Broad Street	Change to exception; retain at 30mph; requires new TRO.		A4055 Broad Street, Harbour Raod to Windsor Road: Place criteria met and 2.1.3A negative limited ped/ cyclist conflict along across the road - access to railway station supported by zebra crossing; 2.1.3B negative as generally good 2m wide fooway provided and controlled crossoing points at key locations.

1 4	Broad Street	Retain as 20mph default; highway constraints affecting provision of 20mph gateway prior to Esat street junction	A4055 Broad Street, Windsor Road to East Street: Place criteria met and 2.1.3A positive as likely high frequency of ped / cyclist crossings / interactions within local shopping centre / high street environment; 2.1.3B negative as generally good 2m wide fooway provided and controlled crossing points at Hood Road.
1 5	Broad Street, not including Gladstone Road roundabout	Change to exception; retain at 30mph; requires new TRO.	A4055 Broad Street, East Street to Gladstone roundabout: Place criteria met and 2.1.3A negative limited ped/ cyclist conflict along the road; 2.1.3B negative as generally good 2m wide fooway provided and controlled crossing points at key locations.
1 6	Gladstone Bridge (Not A or B class road)	Change to exception; retain at 30mph; requires new TRO.	Gladstone Bridge: Place criteria not met and 2.1.3A negative limited ped/ cyclist conflict along the road; 2.1.3B negative as generally good 2m wide fooway provided and controlled crossing point provided on southern side of bridge.
1 7	Ffordd Y Mileniwm (Not A or B Class Road)	Change to exception; retain at 30mph; requires new TRO.	Ffordd Y Mileniwm, Hood Road junction to Cory Way roundabout: Place criteria not met and 2.1.3A negative limited ped/ cyclist conflict along the road; 2.1.3B negative as generally good 2m wide fooway provided with segreagted cycleway and controlled / uncontrolled crossing points provided along the route. Review collision data.
1 8	Gladstone Road	Change to exception; retain at 30mph; requires new TRO.	A4055 Gladstone Road, south of Tynewydd Road junction to and including Western Square roundabout: Place criteria met and 2.1.3A negative as not significant ped/ cyclist conflict along across the road; also 2.1.3B negative as generally good

				2m wide footways provided and several safe controlled / uncontrolled crossing points along route.
	19	Cardiff Road, Barry	Change to exception; retain at 30mph; requires new TRO.	A4055 Cardiff Road, Western Square to north east Laura Street: Place criteria met and 2.1.3A negative as not significant ped/ cyclist conflict along across the road; also 2.1.3B negative as generally good footways provision and several safe controlled / uncontrolled crossing points along route.
	20	Cardiff Road, Dinas Powys	Change to exception; retain at 30mph; requires new TRO. Out of Scope section at Mathew Terrace incorrect.	A4055 Cardiff Road, Merrier Harrier junction to east Brookside junction: Place criteria met and 2.1.3A negative as not significant ped/ cyclist conflict along across the road; also 2.1.3B negative as generally good footways provision and several safe controlled / uncontrolled crossing points along route. Shared footway / cycleway along =side bus lane.
	21	Cardiff Road, Dinas Powys	Change to exception; retain at 30mph; requires new TRO.	A4055 Cardiff Road, south Greenlane to south Elm Grove Road: Place criteria met and 2.1.3A negative as not significant ped/ cyclist conflict along across the road; also 2.1.3B negative as generally good footways provision and several safe controlled / uncontrolled crossing points along route at key locations.
	22	Windsor Road, Penarth	Change to exception; retain at 30mph; requires new TRO.	A4160 Windsor Road, Cogan Hill to west Hickman Road; Place criteria met and 2.1.3A negative as not significant ped/ cyclist conflict along across the road; also 2.1.3B negative as generally good

				fooways provision and several safe controlled / uncontrolled crossing points along route at key locations.
2 3	Penlan Road, Llandough	Change to exception, retain 30mph outside existing trial 20mph scheme limits; new TRO required		B4267 Penaln Road, south Dochdwy Road to south Llandough Hill: Formalise trial one-way system to default 20mph. All other sections Penlan Road to be exception as Place criteria met and 2.1.3A negative as not significant ped/ cyclist conflict along across the road.
2 4	Redlands Road Penarth	Retain as 20mph default		B4267 Redlands Road - all: retain all as 20mph default as Place criteria met and 2.1.3A positive as likely high frequency of ped / cyclist crossings / interactions during school opening and closing times (numerous schools in vicinity)
2 5	Lavernock Road, Penarth	Retain as 20mph default		B4267 Lavernock Road, Cefn Mabley to south of Castle Avenue / Augusta Road junction; retain all as 20mph default as Place criteria met and 2.1.3A positive as likely high frequency of ped / cyclist crossings / interactions during school locations and recreation / playing fields.
2 6	Lavernock Road, Penarth	Change to exception; retain at 30mph; requires new TRO.		B4267 Lavernock Road, south of Castle Avenue / Augusta Road junction to Out of Scope section; Place criteria generally met and 2.1.3A negative as not significant ped/ cyclist conflict along across the road; also 2.1.3B negative as generally good fooways provision and controlled crossing outside Cosmeston Country Park.

27	South Road, Sully	Change to exception; retain at 30mph; requires new TRO.	B4267 South Road, from Lavernock Road to east of access to Sully sports & social club; Place criteria not met; 2.1.3B negative as generally good fooway provision and controlled crossing facility within section of road.
28	South Road, Sully	Retain as 20mph default	B4267 South Road, from east of Sully sports & social club to immediately west Cog Road; Place criteria met and 2.1.3A positive as likely high frequency of ped / cyclist crossings / interactions by virtue of school location, local shop, doctors surgery.
29	South Road, Sully	Change to exception; retain at 30mph; requires new TRO.	B4267 South Road, from west Cog Road to and including Sully Moors Road / Hayes road roundabout junction; Place criteria not met; 2.1.3B negative as generally good fooway provision and uncontrolled crossing facility within section of road.
30	Pontypridd Road	Change to exception; retain at 30mph; requires new TRO.	B4266 Pontypridd Road, Jenner Rd to Port Rd; Place criteria generally met and 2.1.3A negative as not significant ped/ cyclist conflict along across the road; also 2.1.3B negative as generally good fooways provision and controlled crossing at Severn Avenue and Salisbury Road.
31	St Brides Road, Wick	Change to exception; retain at 30mph; requires new TRO.	B4265 St Brides Road, Green Isaf to Church Street; Place criteria generally met and 2.1.3A negative as not significant ped/ cyclist conflict - no residential developent on eastern side of road to create significant crosisng demand.

3 2	St Brides Road, Wick	Retain as 20mph default	B4265 St Brides Road, Church Street to adjacent Star Inn; Place criteria generally met and 2.1.3A positive as likely high frequency of ped / cyclist crossings / interactions by virtue of school location, local shop etc. Cautious approach taken due to presence of school.
3 3	St Brides Road, Wick	Change to exception; retain at 30mph; requires new TRO.	B4265 St Brides Road, adjacent Starr Inn to existing terminal 30mph signs; Place criteria partly met and 2.1.3A negative as not significant ped/ cyclist conflict.
3 4	Wick Road	Change to exception; revert to 30mph buffer; requires new TRO.	B4265 Wick Road, from 20mph gateway to Penlan Road; Place criteria does not apply and evidence suggest difficulty in achieving 20mph compliance as part of pilot scheme monitoring.
3 5	St Brides Road, Eweny	Change to exception; retain at 30mph; requires new TRO.	B4265 St Brides Road, quarry access to Wick Road; minimal frontage not meeting place criteria.
3 6	Wick Road	Change to exception; retain at 30mph; requires new TRO.	B4524 Wick Road, St Brides Road to Corntown Road; Place criteria generally met and 2.1.3A negative as not significant ped/ cyclist conflict - no school; also 2.1.3B negative as generally good footways provision albeit no controlled crossings - no request for crossings recorded.
3 7	Corntown Road	Change to exception; retain at 30mph; requires new TRO.	B4524 Corntown Road, Wick Rd to Parklands; Place criteria generally met and 2.1.3A negative as no residential development on northern side of road.
3 8	Corntown Road	Retain as 20mph default	B4524 Corntown Road, Parklands to terminal 30mph signs; Place criteria generally met and 2.1.3A positive as likely crossing movements to sports grounds east of village and poor quality / substandard

				width footway provision generally.
	3 9	Corntown Road	Create 30mph buffer; requires new TRO	B4524 Corntown Road, terminal 30mph to Golden Mile Inn; create 30mph buffer zone in out of scope road to assist with compliance into default 20. For future consider 40mph scheme from Golden Mile Inn to A48.
	4 0	Southerndown to Main Road	Retain as 20mph default	B4524 through Southerndown westward to boundary of cricket ground; Place criteria not met, however 2.1.3A positive as likely local facilities including sports field, camping ground, public house, restaurant and access to Dunraven Bay will give rise to significant pedestrian movements along /across the road.
	4 1	Southerndown to Main Road	Change to exception; retain at 30mph; requires new TRO.	B4524 boundary of cricket ground to boundary of Brig Y Don car park; Place criteria not met.
	4 2	Main Road	Default to 20mph	B4524 Main Road, boundary of Brig Y Don to north of Hazelwood junction; Place criteria met along part, however 2.1.3A positive as likely local facilities including community hall, post office /shop, cafeteria, access to coastal path and craft centre give rise to significant pedestrian movements along /across the road. Footways also substandard in part.
	4 3	Main Road	Change to exception; retain at 30mph; requires new TRO.	B4524 Main Road, north Hazelwood junction to terminal 30mph signs; Place criteria met and 2.1.3A negative as not significant ped/ cyclist conflict - no school / shops etc; also 2.1.3B negative as generally good footways provision

				albeit no controlled crossings.
	4 4	Ogmore Village	TRO recently completed for 30mph speed limit; progress default to 20mph; requires new TRO to revoke the 30mph Order and create a new 20mph Order	B4524 Ogmore village, extent of 30mph TRO; Place criteria not met, but because of local criteria 2.1.3A positive, including access to castle, car park for Merthyr Mawr estates, equestrian centre, public house and cafe give rise to significant pedestrian movements along /accross the road. No footways.