



***Delegated Decisions by Cabinet Member for
Environment (including Transport)***

Monday, 3 April 2017 at 10.00 am

Committee Room 1, County Hall, New Road, Oxford

Items for Decision

The items for decision under individual Cabinet Members' delegated powers are listed overleaf with related reports attached. Decisions taken will become effective at the end of the working day on Tuesday, 11 April 2017 unless called in by that date for review by the appropriate Scrutiny Committee.

Copies of the reports are circulated (by e-mail) to all members of the County Council.

These proceedings are open to the public

A handwritten signature in black ink that reads "Peter G. Clark".

Peter G. Clark
Chief Executive

March 2017

Committee Officer: **Graham Warrington**
Tel: 07393 001211; E-Mail:
graham.warrington@oxfordshire.gov.uk

Note: Date of next meeting: 27 April 2017

If you have any special requirements (such as a large print version of these papers or special access facilities) please contact the officer named on the front page, but please give as much notice as possible before the meeting.

Items for Decision

1. Declarations of Interest

2. Questions from County Councillors

Any county councillor may, by giving notice to the Proper Officer by 9 am two working days before the meeting, ask a question on any matter in respect of the Cabinet Member's delegated powers.

The number of questions which may be asked by any councillor at any one meeting is limited to two (or one question with notice and a supplementary question at the meeting) and the time for questions will be limited to 30 minutes in total. As with questions at Council, any questions which remain unanswered at the end of this item will receive a written response.

Questions submitted prior to the agenda being despatched are shown below and will be the subject of a response from the appropriate Cabinet Member or such other councillor or officer as is determined by the Cabinet Member, and shall not be the subject of further debate at this meeting. Questions received after the despatch of the agenda, but before the deadline, will be shown on the Schedule of Addenda circulated at the meeting, together with any written response which is available at that time.

3. Petitions and Public Address

4. Proposed ULEV Charging Point Bays - Various Locations, Oxford (Pages 1 - 12)

Forward Plan Ref: 2016/141

Contact: David Tole, Traffic Safety & Area Steward Manager Tel: (01865) 815942/07920 084148

Report by Director for Infrastructure Delivery (**CMDE4**).

Go Ultra Low Oxford is a government funded project run by the County and City Councils to trial electric car charging technologies on streets where off-street parking is unavailable. By 2027 more people could be buying electric cars than petrol or diesel; this project will help communities prepare for this future.

The report presents responses received in the course of a statutory consultation on the introduction of parking bays for use by Ultra Low Electric Vehicles (ULEV) whilst being connected to roadside charging points.

The Cabinet Member for the Environment is RECOMMENDED to:-

- (a) welcome the initiative to introduce on-street charging points for Ultra Low Electric Vehicles and associated parking places;***
- (b) approve the proposals as advertised in Vicarage Close;***

(c) not approve the advertised proposal for Bainton Road and to request officers to consider an alternative location

5. Proposed Speed Limit Change - B4017 Abingdon Road, Drayton
(Pages 13 - 18)

Forward Plan Ref: 2017/011

Contact: David Tole, Traffic Safety & Area Steward Manager Tel: (01865)
815942/07920 084148

Report by Interim Director for Infrastructure Delivery (**CMDE5**).

The report presents responses received in the course of a statutory consultation on an amended proposal for a revision to the speed limit on the B4017 between Abingdon and Drayton.

The Cabinet Member for Environment is RECOMMENDED to approve the proposals as advertised.

6. Proposed Speed Limit Change - Coxwell Road, Faringdon (Pages
19 - 24)

Forward Plan Ref: 2017/004

Contact: David Tole, Traffic Safety & Area Steward Manager Tel: (01865)
815942/07920 084148

Report by Director for Infrastructure Delivery (**CMDE6**).

The report presents responses received in the course of a statutory consultation on a proposal for an extension of the 30mph speed limit on Coxwell Road, Faringdon.

The Cabinet Member for Environment is RECOMMENDED to approve the proposals as advertised.

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Division(s): N/A

CABINET MEMBER FOR ENVIRONMENT – 3 APRIL 2017

PROPOSED ULEV CHARGING POINT BAYS – VARIOUS LOCATIONS, OXFORD

Report by Strategic Director, Communities

Introduction

1. This report presents responses received in the course of a statutory consultation on the introduction of parking bays for use by Ultra Low Electric Vehicles (ULEV) whilst being connected to roadside charging points.

Background

2. Go Ultra Low Oxford is a government funded project run by the County and City Councils to trial electric car charging technologies on streets where off-street parking is unavailable. By 2027 more people could be buying electric cars than petrol or diesel; this project will help communities prepare for this future. Around 20 drivers living in various parts of Oxford have volunteered to take part in the trial and have requested a charger for their street. All the volunteers have to park their car on the street as their properties do not have a driveway, making charging an electric car a real challenge.
3. The project seeks to install chargers on streets as close as possible to where the trial volunteers live and where there is a readily-available electricity supply; to ensure that ULEVs can access these charging points it is proposed to create 15 new 'electric car charging bays'. During the day the charging bays will be open to anyone to use for charging an electric car for up to 3 hours; for those bays that are in CPZs there will be a requirement for vehicles parked overnight to display a Permit for the Zone. At all times a vehicle using a charging bay will have to be plugged in to the charging point.

Consultation

4. Consultation on the installation of these charging bays was carried out in January and February through a combination of local publicity for the overall scheme, via the Council's consultation portal, and with a public notice placed in the Oxford Times, and sent to statutory consultees.
5. Around 30 responses were received from residents with a number welcoming the proposals either in specific locations or as a general principle to encourage the take up of low emission vehicles. Objections were received to two of the proposed locations – Bainton Road (in St Margaret's Division) and Vicarage Close (in Rose Hill & Littlemore Division); this location is proposed to have a double bay to accommodate two local volunteers. The plans at **Annex**

1 show the locations of these proposed bays and **Annex 2** summarises the responses received to the bays as well as to others advertised as part of this project.

Review of responses

6. With regard to the proposed bay in Bainton Road, the responses received indicate that there is support for the principle of charging bays but not in this specific location. The objectors suggest that there is an alternative location elsewhere on the street (approx. 100m away) where they consider there is less demand for parking by local residents. Subject to this being suitable for the provision of on-street charging equipment it is suggested that this option be explored with the project team.
7. The responses to the proposed bays on Vicarage Close express concern about their proximity to the junction with St Nicholas Road. It should be noted that both roads are subject to a 20mph limit and as it is a cul-de-sac Vicarage Close will generally only be used by local traffic. It is therefore considered that parking in this location is acceptable and given the principles of the project – to locate charging bays in streets near to volunteers' homes rather than in public areas such as supermarkets etc – these bays should be approved.
8. The specific support for many of the other bays is noted and welcomed.

How the Project supports LTP4 Objectives

9. The proposals would help facilitate the increased use of Ultra Low Electric Vehicles.

Financial and Staff Implications (including Revenue)

10. Funding for the consultation and implementation of the bays and associated charging points has been made available through the Government's Office for Low Emissions Vehicles.

RECOMMENDATION

The Cabinet Member for the Environment is RECOMMENDED to:-

- (a) **welcome the initiative to introduce on-street charging points for Ultra Low Electric Vehicles and associated parking places;**
- (b) **approve the proposals as advertised in Vicarage Close;**
- (c) **not approve the advertised proposal for Bainton Road and to request officers to consider an alternative location**

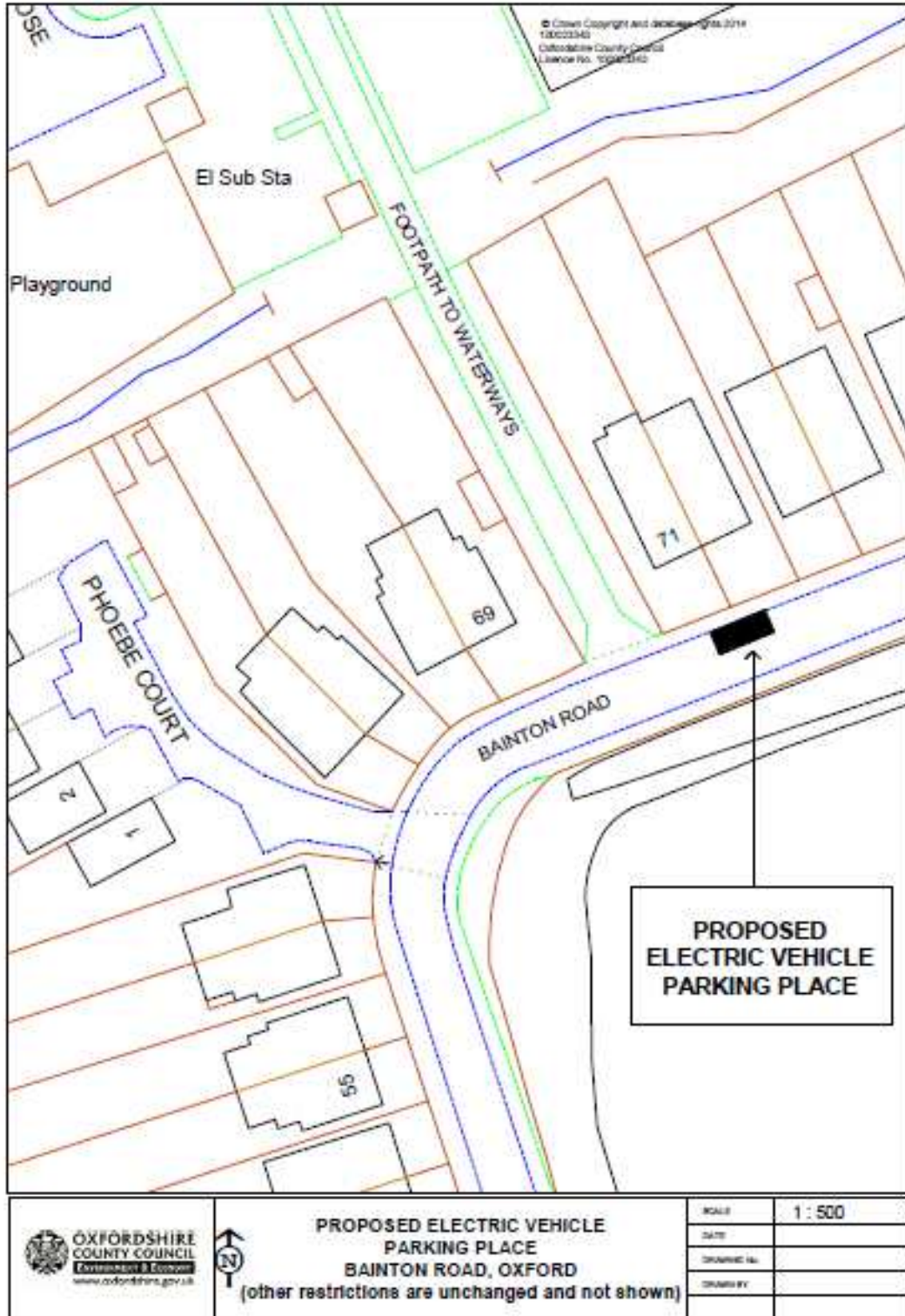
CMDE4

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Director for Infrastructure Delivery

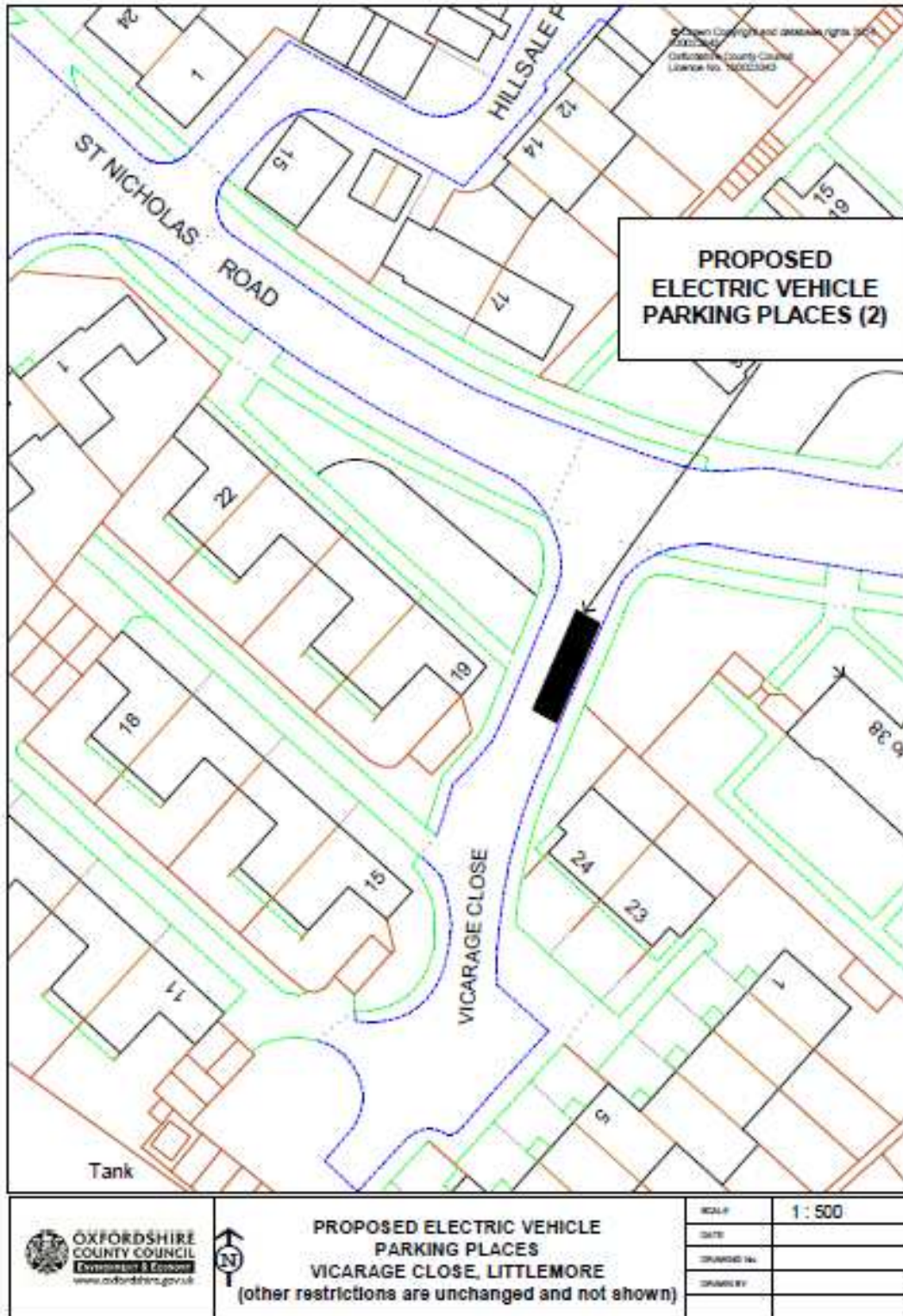
Background papers: Plan of proposed restrictions
 Consultation responses

Contact Officers: David Tole 07920 084148

March 2017



1



**PROPOSED ELECTRIC VEHICLE
PARKING PLACES
VICARAGE CLOSE, LITTLEMORE**
(other restrictions are unchanged and not shown)

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RESPONDENT	SUMMARISED COMMENTS
Bainton Road, (Oxford)	Object - The proposed site for the charging bay is not practical for Bainton Road. It takes away the last residents parking space on the North side of the road, just at the point where there is no further on street parking until the third house down on the West side. Parking comes under immense pressure here as soon as there is any form of building work being undertaken on the street and with an ageing population these spaces are often used for carers. Using a parking space towards the end of Bainton Road, near the Woodstock Road, would be both more accessible and visible to those who require it. These parking spaces are often free during the day and are not under pressure from local residents requiring parking.
Bainton Road, (Oxford)	Object - I welcome the Council's ULEV initiative in general but question the suitability of Bainton Road itself for a charging bay. I am writing to express my concern regarding the proposed EVPP in Bainton Road, Oxford. Bainton Road is - from a parking perspective - a road of two halves. The houses in the northern half (from Phoebe Court to Woodstock Road) all have off-street parking for one or more cars, while most of the houses in the western half (backing onto the Oxford Canal) have on-street parking. Nos. 23-57 all park on-street with the sole exception of nos. 39 and 43. As a result, parking spaces in this stretch are often difficult to find, and this can force residents to park at the end of the road near the St John's College infant school. The reservation of even one space for electric vehicle charging is an inconvenience in an already crowded road, where builders' vehicles and skips reduce parking spaces still further.
Bainton Road, (Oxford)	Object - Regarding the proposed parking bay on Bainton Rd. As a resident of a property near to the proposed bay, it is already very difficult to find a parking place nearby most evenings, as much of the road is double yellow and there is considerable overspill of people resident in nearby Phoebe Court who park on the road. Putting an electric only bay will make a difficult situation even worse. A far better solution would be to put such bays in one of the 2 hour slots at the corner of Bainton Rd and Woodstock Rd. These slots are nearly always vacant so this would not cause as much disruption.
Bainton Road, (Oxford)	Object – The proposed charging bay is a location often used for deliveries to houses in Phoebe Court and houses in Bainton Road. There is plenty of unutilised parking space at the end of Bainton Road between the

CMDE4

	school and Woodstock Road and in Frenchay Road which would seem more appropriate locations for charging bay.
Bainton Road, (Oxford)	Object - I support electric vehicles and therefore charging bays for those without off road parking. I just do not understand the location that has been chosen which is outside my property. This area of Bainton Road is always short of parking with vehicles often parked across the pavement (on yellow lines) due to lack of parking. Why not locate it by the junction of Bainton and Woodstock where there are often spaces, where there would be a wider demand, and where you would not stop a resident from parking outside their own house?
On behalf of Bainton Road, (Oxford)	Object - The proposed charging bay is adjacent to my mother's property and is one of the few places in Bainton Road near to the house where visitors (including nurses, occupational therapists, family members, friends etc) can park. Beyond number 71 there is an entrance to the nearby estate and then no parking for a considerable distance round the bend to the west of number 73. Also, this part of Bainton Road has very few car parking spaces because the driveways of the houses take up much of the kerb space. The few spaces there are come under frequent pressure of over use and even now sometimes one cannot park nearby. If this space is lost to electric vehicles it will exacerbate an existing parking problem. The residents pay for extra residents' parking tickets (after initial allotments are exhausted) and as such they should be able to park conveniently to their properties. Also this space would not be ideal for non-local electric car users due to its position some distance from the Woodstock Road and out of sight to passing traffic. Probably a better option for Bainton Road, if it is essential for charging bay to be sited there would be nearer Woodstock Road, though even these spaces also come under pressure.
Vicarage Close, (Oxford)	Support - Please put one on Vicarage Close
Vicarage Close, (Oxford)	Support - Vicarage Close needs an electric charging point. Very inconvenient as a hybrid car owner.
Vicarage Close, (Oxford)	Object - Vicarage Close like a number of streets in Oxford suffers from parking problems. Cars from the residents in St Nicholas Road use the road and if we lose two car park spaces residents will not be able to access a parking space and the displaced cars will be forced onto St Nicholas Road which at its junction with Vicarage Close has a gradual bend masking the view up and down the road past parked cars very difficult. Turning into Vicarage Close from St Nicholas Road is already hazardous when vehicles are coming up from

CMDE4

	<p>Minchery Farm. There is also a bus stop close to this junction. There is one car which is electric in the Close, that resident has a garage and forecourt and there would be nothing to stop them from putting a power supply to their garage at their expense.</p>
Vicarage Close, (Oxford)	<p>Object - I object to this proposal as there are already insufficient parking spaces for the residents of Vicarage Close due to non-residents parking. Additionally, households with multiple vehicles also add to the difficulties. The loss of 2 more parking spaces will only cause further problems. The Vicarage Close junction with St. Nicholas Rd. is already a traffic hazard, due to cars parking on the bend of the road. This being caused by the development on the former Mabel Prichard School site, the blocks of flats and nearby shops in St. Nicholas Rd. In addition vehicles entering Vicarage Close are forced onto the wrong side of the road by existing parked vehicles (where the proposed parking spaces are proposed). I would be interested know how this project is to be funded and why Vicarage Close has been identified as a possible site for these charging points. I conclude this project totally unsuitable due to the reasons listed with better alternative sites on a less built up area i.e. local supermarkets or business parks. I feel that if people want to purchase electric cars it is their responsibility to source appropriate charging points, e.g. on their own premises</p>
unknown	<p>Object - Regarding the proposed location of the charging point on Vicarage Close. Parked cars in this location would make entry for emergency vehicles difficult. The outline of the bay on your proposal adjoins my property. It is also located under a horse chestnut tree (which has a tree preservation order). Personally, I would never park my vehicle in this location due to the risk of debris from the tree damaging my car. I would suggest that a more suitable location would be on St Nicholas Road by the shops.</p>
unknown	<p>Support - Re. the proposed parking bay for electric charging at the top of Southfield Road.</p> <p>I'm in no doubt that having a charging point at this location would be well used and also encourage more people locally to switch to an electric car. I know there are many people in the Southfield Road in a similar position - i.e. they would love to "go electric" but without a charging point near home it just isn't feasible. The Southfield Road area is home to many environmentally-aware people who I'm sure would be encouraged to get an electric car if they could see a neighbour using a charger successfully and easily on a daily basis.</p>
Morrell Avenue, (Oxford)	<p>Support - As someone who's environmentally conscious and aiming to purchase an electric car in the near</p>

CMDE4

	<p>future, I'm writing to support the introduction of electric car charging points in Oxford, particularly the Southfield Rd location. This is a central East Oxford location which acts as a bridge between Cowley Rd and Morrell Avenue so represents a great place to trial a charging point.</p>
<p>North Hinksey Lane, (Oxford)</p>	<p>Support - While I am outside of the City of Oxford boundary, I work and identify with the city as the place that I live. I am extremely proud that Oxford is leading the way in making electric vehicles more accessible to residents and hope that the rest of the county will learn from their experience of this project and follow suit.</p> <p>This is an opportunity to enable access to the latest mobility technology, reduce our dependency on expensive and insecure fossil fuel-based cars, reduce our contribution to climate change and improve air quality (which impacts me - and all other commuters and visitors - directly even though I reside outside the city boundary). I strongly support these proposals.</p>
<p>Warwick Street, (Oxford)</p>	<p>Support - This is very much needed to make Oxford a city of the future. I am very supportive of this idea. The parking situation in Warwick Street however should be looked at in tandem; residents permits are very much needed.</p>
<p>Kingston Road, (Oxford)</p>	<p>Support - Farndon Road Most houses don't have a driveway, so most households have no means of charging an electric car. There are no current facilities, so if the City is serious about promoting electric cars, charging points need to be added.</p>
<p>Chilswell Road, (Oxford)</p>	<p>Support – Kineton Road As a OLEV owner living on Chilswell Road, I support the proposal of bay(s) on Kineton Road wholeheartedly.</p>
<p>Winchester Road, (Oxford)</p>	<p>Support - I will have to sell my 100% EV if I can't have a charging point installed in my area as it is incredibly inconvenient having to drive to charge - sometimes miles.</p>
<p>Hill Top Road, (Oxford)</p>	<p>Support</p>

CMDE4

Divinity Road, (Oxford)	Support – Southfield Road The provision of electric vehicle charging points is to welcomed and I support the proposal for Southfield Road and more generally.
Henry Road, (Oxford)	Support
Hunsdon Road, (Oxford)	Support - Oxford should be moving to enable all its citizens to use electric cars, not only because we should be aiming to be a zero carbon city, but also because of the dreadful air quality in the city and the high incidence of lung disease. I would support charging points on every lamp-post in the city.

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Division(s): Sutton Courtenay and Marcham

CABINET MEMBER FOR ENVIRONMENT – 3 APRIL 2017

PROPOSED SPEED LIMIT CHANGE - B4017 ABINGDON ROAD, DRAYTON

Report by Strategic Director, Communities

Introduction

1. This report presents responses received in the course of a statutory consultation on an amended proposal for a revision to the speed limit on the B4017 between Abingdon and Drayton.

Background

2. An extension of the 30mph speed limit on B4017 Abingdon Road was proposed by developers as part of works to create a new access for a residential development at the location shown at Annex 1. The consultation on this proposal was carried out in September and October 2016, and the responses reported to the Cabinet Member Decisions meeting on 12 January, where, following representations from the Parish Council, it was agreed to consult on a revised proposal to replace the existing 50mph speed limit between Abingdon and Drayton with a 40mph speed limit, with no changes being made to the 30mph speed limits, as shown at Annex 2.

Consultation

3. The formal consultation on the revised proposal was carried out between 1 February and 3 March 2017. A public notice was placed in the Abingdon Herald newspapers and sent to statutory consultees, including Thames Valley Police, the Fire & Rescue Service, Ambulance service, Drayton Parish Council and the local County Councillor.
4. Thames Valley Police registered an objection on the grounds that while the average speeds as measured by a speed survey carried out in February 2017 were – at 42.5mph – likely to be acceptable, the 85th percentile speed – 48.8mph – was almost 2mph higher than the 7mph threshold above the speed limit used by the police when assessing the likely demands for enforcement.
5. Abingdon Town Council expressed support for the proposal; no response was received from Drayton Parish Council.

Review of responses

6. The objection of Thames Valley Police is noted and it is accepted that there is no proposed change to the character of the road on the length where a 40mph speed limit is proposed that might help further support compliance. However, as noted in the police response, the existing average speed is already fairly close to being acceptable from their perspective, and it seems very likely – based on research on the effect of speed limits used in the Department for Transport guidance on setting speed limits - that if the proposal was to be approved, the 85th percentile speeds would reduce to below the above 7mph threshold applied by the police.
7. The support for the proposal by Abingdon Town Council is noted

How the Project supports LTP4 Objectives

8. The proposals would help facilitate the safe movement of traffic.

Financial and Staff Implications (including Revenue)

9. Funding for the speed limit extension has been provided by the developer of the residential land adjacent to the B4017 Abingdon Road.

RECOMMENDATION

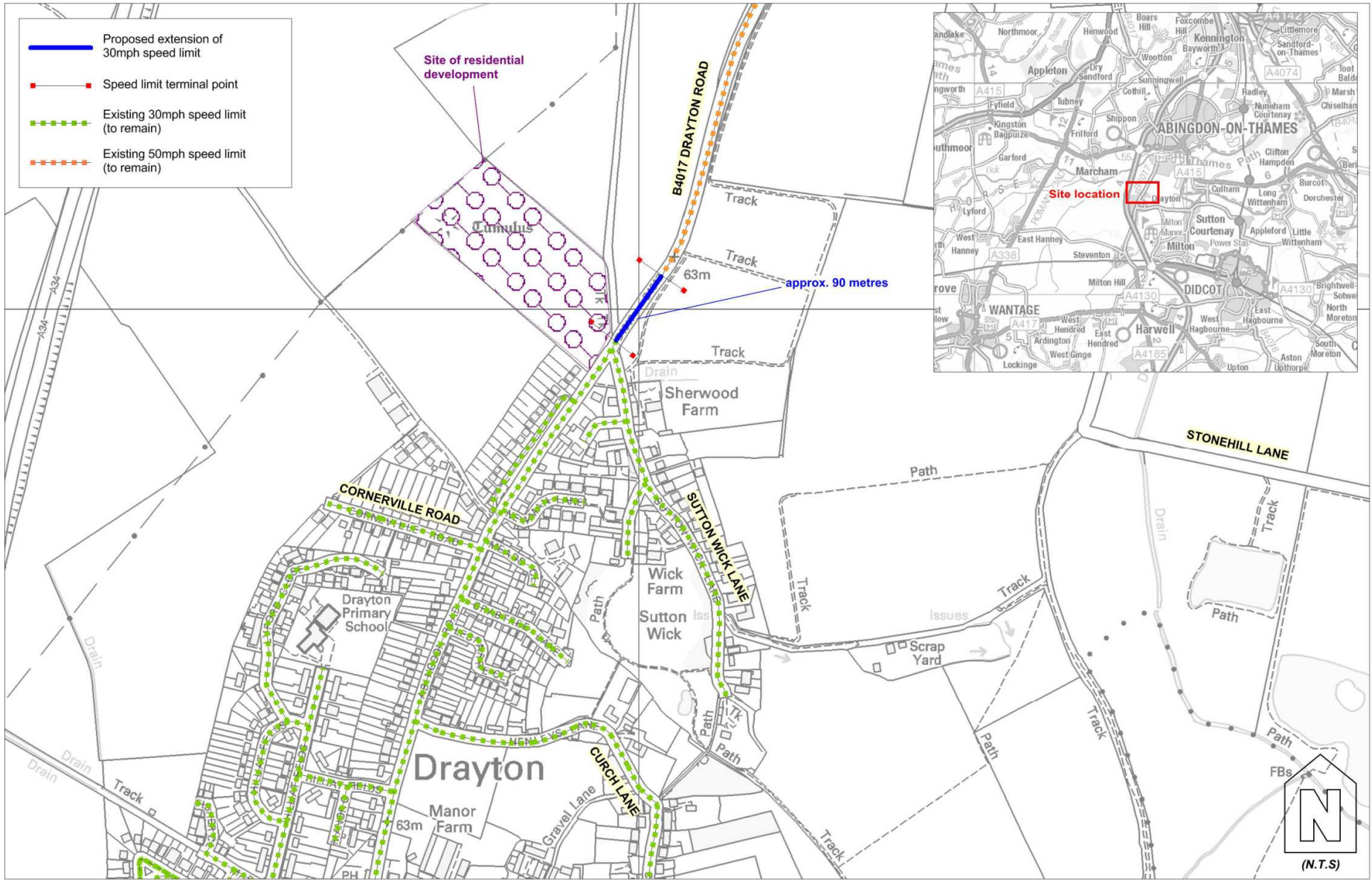
The Cabinet Member for Environment is RECOMMENDED to approve the proposals as advertised

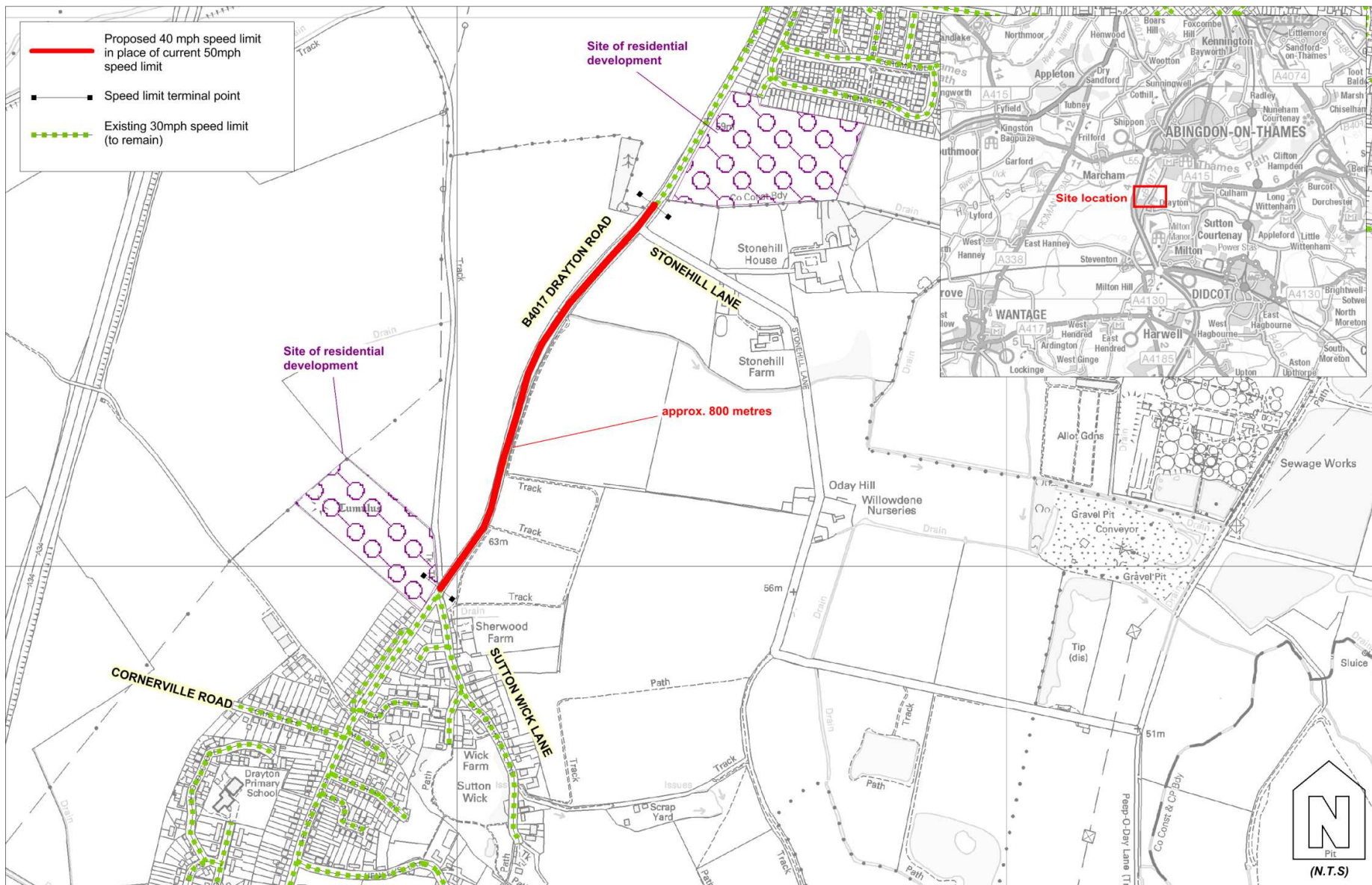
OWEN JENKINS
Director for Infrastructure Delivery

Background papers: Plan of proposed restrictions
 Consultation responses

Contact Officers: David Tole 07920 084148

March 2017





RESPONDENT	SUMMARISED COMMENTS
(1) Thames Valley Police	<p>Thames Valley Police are not opposed to lowering speed limits providing they are appropriate to the road environment and likely to have casualty reduction benefits.</p> <p>The recent speed survey shows the 85th percentile speed to be 48.8 mph and the mean speed to be 42.5mph. While the latter appears acceptable, the view of the police is that where the 85th percentile speed is 7mph or more over the proposed limit, the limit is unlikely to be effective without other measures such as engineering or continual enforcement, placing further burden on the limited police resources for enforcement.</p> <p>It is the police view that the current speed limit is appropriate to this environment and therefore object to this proposal.</p>
(2) Abingdon Town Council	Expressed support for the proposal

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Division(s): Faringdon

CABINET MEMBER FOR ENVIRONMENT – 3 APRIL 2017

PROPOSED SPEED LIMIT CHANGE – COXWELL ROAD FARINGDON

Report by Strategic Director, Communities

Introduction

1. This report presents responses received in the course of a statutory consultation on a proposal for an extension of the 30mph speed limit on Coxwell Road, Faringdon.

Background

2. An extension of the 30mph speed limit on Coxwell Road was proposed by developers as part of works to create a new access for a residential development at the location shown at Annex 1.

Consultation

3. The formal consultation on the proposal was carried out between 12 January and 10 February 2017. A public notice was placed in the Oxford Times newspaper and sent to statutory consultees, including Thames Valley Police, the Fire & Rescue Service, Ambulance service, Faringdon Town Council and the local County Councillor.
4. Seven responses were received as summarised at Annex 2. Copies of all the full responses received are available for inspection in the Members' Resource Centre).
5. Thames Valley Police and the Vale of the White Horse District Council expressed no objection and the proposal was supported by the local County Councillor. Faringdon Town Council supported the proposal, but commented that with further planned housing development, consideration could also have been given to extending the 30mph speed limit now as far as the A420 junction (and possibly to extend to Great Coxwell). Very similar comments were made by two members of the public, raising concerns over the potential extra costs of extending the speed limit incrementally; one of these responses was still supportive of the proposal, while the other expressed an objection on the grounds of abortive costs.
6. One objection was received from a member of the public (not a resident of the area) on the grounds that a 30mph speed limit was not consistent with the character of the road even with the planned development, and that a 40mph speed limit would be more appropriate, and would avoid the risk of an

unrealistic speed limit leading to a more general reduction in respect for speed limits.

Review of responses

7. The responses of Thames Valley Police, the local member and the Vale of the White Horse District Council are noted.
8. Faringdon Town Council's comments on the possibility of extending the 30mph limit further – either to the A420 junction, or to Great Coxwell – are noted, and it is accepted that further extensions of the 30mph speed limit will very likely be progressed in conjunction with further development. It is, however, judged that at present it would be more appropriate to proceed with the extension as consulted on, as compliance with the extended limit as requested would be compromised by the current road environment, which is rural. Although it is accepted that additional costs will be incurred when further changes to the speed limit are made, these will be met – as is the case with the current proposal – by the developers of the adjacent land. These same comments apply to the very similar representations made by two of the responses made by members of the public.
9. The objection from the member of the public that a 30mph speed limit is unrealistic given that the new development is only on one side of the road, and that a 40mph speed limit would be more appropriate is similarly noted. While it is accepted that the road where the current development is is not heavily built up, the 30mph speed limit as proposed is judged to be in accordance with Department for Transport guidelines on setting speed limits, and is supported by all of the other respondents to this consultation, notwithstanding the queries raised on the possibility of extending the 30mph limit further at this time.

How the Project supports LTP4 Objectives

10. The proposals would help facilitate the safe movement of traffic.

Financial and Staff Implications (including Revenue)

11. Funding for the speed limit extension has been provided by the developer of the residential land adjacent to the Coxwell Road, Faringdon

RECOMMENDATION

The Cabinet Member for Environment is RECOMMENDED to approve the proposals as advertised.

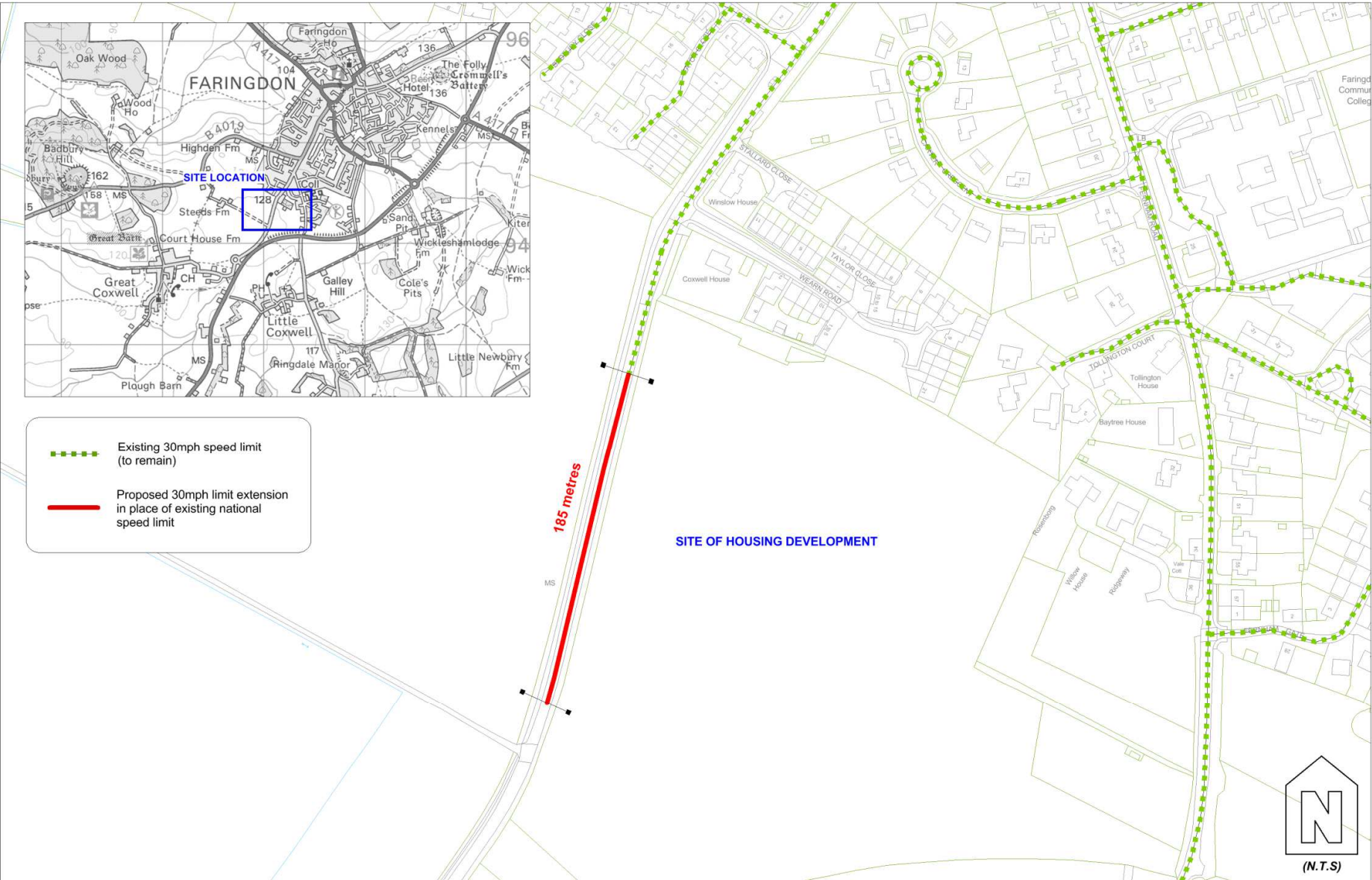
OWEN JENKINS

Director for Infrastructure Delivery

Background papers: Plan of proposed restrictions
Consultation responses

Contact Officers: David Tole 07920 084148

March 2017



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Date drawn: 10/01/2017
 Drawn by: C/JM

Map centre:
 easting. 428133, northing. 194331

RESPONDENT	SUMMARISED COMMENTS
(1) Thames Valley Police	No objection.
(2) Faringdon Town Council	<p>Supports – with the following comments:</p> <p>Although Faringdon Town Council is supportive of reduced speed limits on Coxwell Road exiting Faringdon, Faringdon Town Council has noted that the developer is only prepared to fund this proposed speed limit for a distance of 185m in respect of the Fernham Fields development.</p> <p>Town Council has been advised that consideration to changing speed limits and the funding of such changes is only made in respect of each planning application, independent of other applications. However, it does strongly feel in this instance that, given the potential for further housing developments on Coxwell Road, it would be much more appropriate for the speed limit to be reduced to 30mph from Faringdon's parish boundary all the way down Coxwell Road to the A420 junction and possibly into Great Coxwell and that this work should be carried out all at the same time.</p>
(3) Local County Councillor	Supports proposal.
(4) Vale of White Horse District Council	No objection.
(5) Resident, (Marlborough Street)	<p>Supports – with the following comments:</p> <p>The whole of Coxwell Road up to the roundabout should become 30mph in preparation for when the Steeds</p>

CMDE6

	<p>housing development is occupied; it would be more sensible and cost effective to implement in one stage, rather in incremental steps.</p>
<p>(6) Resident, (Cumnor)</p>	<p>Objects – with the following comments:</p> <p>Given there are houses on one side and fields on the other 40mph is the right limit; a lower limit without supporting traffic calming measures will lead to speed limits being disrespected more generally to the detriment of compliance of speed limits where they are required..</p>
<p>(7) Resident, (Great Coxwell)</p>	<p>Objects – with the following comments:</p> <p>In the last year the 30mph zone has been moved together with so called gateway and incorrect signage saying Faringdon (This is still part of Great Coxwell). Within a year you now propose going to the cost of moving the limit once again and all the costs that go with it; as you have given outline permission for Steeds Farm – if as seems likely this will require a further extension of the 30mph limit, it would be more cost effective to make this change now, and therefore objects to the current proposal.</p>