

Divisions affected: *Berinsfield and Garsington*

DELEGATED DECISIONS BY CABINET MEMBER FOR TRANSPORT MANAGEMENT

05 SEPTEMBER 2024

BERINSFIELD: PROPOSED 20MPH SPEED LIMITS

Report by Director of Environment and Highways

RECOMMENDATION

The Cabinet Member is **RECOMMENDED** to:

- a) **Approve the introduction of 20mph speed limits in Berinsfield as advertised.**

Executive Summary

1. The report presents responses to a statutory consultation on the proposed introduction of 20mph speed limits in Berinsfield as shown in **Annex 1**.

Financial Implications

2. Funding for consultation and the proposals themselves has been provided by the County Council's 20mph Speed Limit Project.

Legal Implications

3. No legal implications have been identified in respect of the proposals.

Equality and Inclusion Implications

4. No implications in respect of equalities or inclusion have been identified in respect of the proposals.

Sustainability Implications

5. The proposals would help encourage walking and cycling within Berinsfield by making them safer and more attractive.

Formal Consultation

6. Formal consultation was carried out between 6 and 29 March 2024. A notice was published in the Oxfordshire Herald Series newspaper, and an email sent to statutory consultees & key-stakeholders, including Thames Valley Police, the Fire & Rescue Service, Ambulance service, Bus operators, countywide transport, access & disabled peoples user groups, South Oxfordshire District Council, the local District Cllrs, Berinsfield Parish Council, and the local County Councillor representing the Berinsfield and Garsington division.

Statutory Consultee Responses:

7. Thames Valley Police re-iterated their views concerning OCC's policy and practice regarding 20mph speed limits, they consider their view as 'having concerns' rather than a formal objection.
8. Oxford Bus Company submitted an extensive objection – as shown in full in **Annex 3** – which follows previous concerns raised about their belief that the proposals were indiscriminate and of an arbitrary nature similar to a wide variety of schemes. They considered the proposal as advertised likely to pose significant issue for bus operation, either when considered "solus" on its own terms, or when the cumulative impacts of multiple such measures were looked at more broadly on a given bus route. They felt that each of the 20mph proposals were being consulted on based on a single village with no clear systematic regard, through the process, for the impacts on the reliability, operability or effectiveness of bus services in the local area and beyond.

Other Responses:

9. Two local residents also responded during the course of the consultation, both objected, with one citing that drivers would spend more time looking at their speed rather than the road, and the other suggesting that the proposals were an unnecessary waste of taxpayers' money which should be spent on projects to better benefit communities.
10. In response to the concerns of Oxford Bus Company, a survey of bus journey times was carried out on the 7 August. While accepting this was a single survey, it is considered likely to be reasonably representative of typical conditions noting the adherence to the published schedule and presence of extensive traffic calming along the route. The results of this survey are shown in **Annex 4** and indicate that due to the character of the roads comprising the route through the village, the actual recorded peak speed was only just over 20mph. Taking this into account it appears that the additional journey time as a result of the proposed 20mph speed limit would be minimal.
11. The consultation responses are shown in **Annex 2**, and copies of the original responses are available for inspection by County Councillors.

Officer Response to Objections/Concerns

Legend	
Proposed 20	
Existing 20	
Existing 30	
Existing 40	
Existing NSL	
Not Public Highway	

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Rev.	Date	Purpose of revision	Drawn	Checked	Approved
1.0	20.11.23	Proposal 1	C.R		

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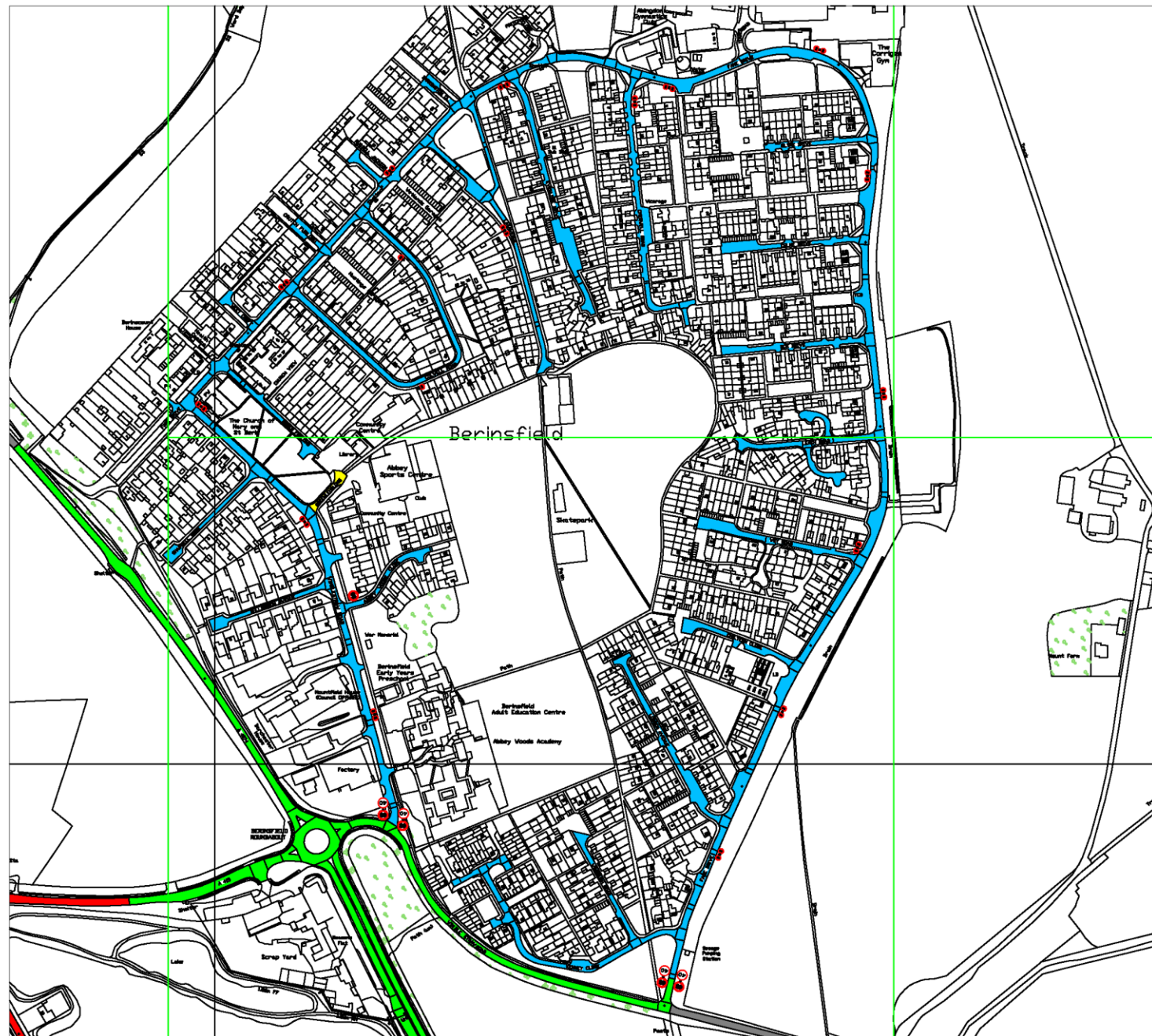
Project title: Berinsfield 20mph Scheme

Drawing title:
 Berinsfield 20mph Scheme Overview

Drawing Status

Scale @ A3	Drawn by: C.R	Checked by: G.JB	Approved by: G.JB
	Date drawn: 20.11.23	Date checked: 30.11.23	Date approved: 30.11.23

Oxfordshire Project No. & File Ref
 Drawing No. 1.0 Revision 1.0



RESPONDENT	COMMENTS
(1) Traffic Management Officer, (Thames Valley Police)	<p>Concerns –Thames Valley Police welcome the opportunity to engage on plans for road safety improvement and acknowledge that 20mph limits can be a useful tool in road safety. There are other reasons 20mph limits may be desirable for communities, such as environmental concerns, and creating a shared space environment to encourage greater diversity of road users.</p> <p>Compliance with 20mph limits is a challenging issue as there is a difference between the achievable results of the various available schemes. For example a sign-only scheme will only have a limited effect on the mean speeds, as opposed to other schemes that influence the road environment, which is recognised as being key to achieving compliance. If a speed limit is set too low and is ignored then this could result in the vulnerable road user being less safe. It can also cause a dis-proportionate number of drivers to criminalise themselves and could bring the system of speed limits into disrepute.</p> <p>Thames Valley Police have no policy to enforce based on arbitrary speed limits alone but will enforce based on threat of harm, risk and resourcing. 20mph limits are not excluded from this and will be enforced where appropriate. There should be no expectation that the police would be able to provide regular enforcement if a speed limit is set too low as this could result in an unreasonable additional demand on police resources and there are no additional resources available to support extra enforcement. Messages from partners that police will not enforce need to be discouraged. Such messaging can encourage non-compliance and should be avoided.</p> <p>The policy of Thames Valley Police is to use sound practical and realistic criteria (Setting local speed limits - GOV.UK (www.gov.uk)) when responding to Highway Authorities in an effort to promote consistency and to reduce the burden of constant and unnecessary enforcement. The advice shown in Circular Roads 1/2013 states.</p> <p>The key factors that should be taken into account in any decisions on local speed limits are:</p> <ul style="list-style-type: none"> • history of collisions • road geometry and engineering • road function • composition of road users (including existing and potential levels of vulnerable road users) • existing traffic speeds

	<ul style="list-style-type: none"> road environment <p>However I recognise Oxfordshire County Council now have their own Policy for Setting Speed Limits and I expect full compliance of that policy going forward in relation to both monitoring , future engineering and self-enforcement through Community Speed Watch .</p> <p>Our stance remains that primarily 20 mph speed limits and zones should be self-enforcing</p> <p>Speed limits should be considered as part of a package of measures to manage vehicle speeds and improve road safety. Changes to the highway (for example through narrowing, providing vertical traffic calming or re-aligning the road) may be required to encourage lower speeds in addition to any change in speed limit. Though these may be more expensive, they are more likely to be successful in the long term in achieving lower speeds without the need for increased police enforcement to penalise substantial numbers of motorists.</p>
(2) Head of Built Environment and Infrastructure, (Go-Ahead Group)	<p>Object – on behalf of Oxford Bus Company and Thames Travel. We trust it is self-explanatory and can be given due and appropriate consideration. We greatly regret having to lodge an objection, but we have been left with no appropriate alternative given that a public TRO consultation has been initiated.</p> <p><i>[See Annex 3 for full response]</i></p>
(3) Local resident, (Berinsfield, Glyme Drive)	<p>Object – Because you spend more time not looking what’s in front of you. Instead more concerned about the speed your doing. And miss what is going on in front of you. Especially elderly people, with eye sight deteriorating. 30 is so much easier to keep to with out keep looking at the gauge in the car.</p>
(4) Member of public, (unknown)	<p>Object – Like all of the other 20mph zones installed in Oxfordshire, this is an unnecessary waste of valuable taxpayers money which should be spent on projects to benefit communities. Blanket 20mph zones are rightly disregarded by motorists, increase conflict on the roads and mean that zones which are actually really needed around areas such as schools are also ignored instead of being used properly to flag areas for greater safety awareness. Cllr Gant in particular is pushing these zones in the face of increasing opposition, evidence that they do not reduce accidents (increasing them in some areas) and needs to urgently reconsider what he is doing. Be bold enough to pause this policy, to evaluate the impact and to admit mistakes - many of the existing 20mph zones need reverting to 30mph, just as the Welsh Government are finding and are doing. The pity is that valuable public funds are being</p>

	<p>wasted in the face of clear need to spend on other genuine priorities or in not increasing taxation on those living in poverty - it is no exaggeration to say that families who cannot properly afford to feed their children or heat their homes are having to pay their council tax to pay for projects like this which is an absolute disgrace. I know OCC will not change policy, will not listen, but I live in hope that one day those responsible for this will look back and feel guilty that they missed their chance to effect meaningful benefit for the people of the county to push this agenda.</p>
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14th March 2024

By e-mail only: christian mauz@oxfordshire.gov.uk

Christian Mauz
Senior Officer (TRO and Schemes) Network Management

Directorate of Environment & Place
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OX1 1ND

Dear Mr Mauz,

STATUTORY CONSULTATION – Ref: CM/12.6.126 - Berinsfield proposed 20mph Speed Limits

I refer to the proposed Traffic Regulation Order changes referenced above. City of Oxford Motor Services Limited (Oxford Bus Company) and Thames Travel (Wallingford) Limited (“Thames Travel”, “TTW”) formally objects to the proposed Order. The basis for this objection is set out below.

We are surprised and disappointed to be faced with this proposal when, following previous concerns raised about the indiscriminate and arbitrary nature of a wide variety of similar schemes, we had submitted a list to the Council's officers at their request, highlighting those villages where simple substitution of an existing 30mph limit for a 20 mph limit would be likely to pose significant issue for bus operation, either when considered “solus” on its own terms, or, more likely, when the cumulative impacts of multiple such measures were looked at more broadly on a given bus route. It is notable that each of these proposals is being worked up and consulted on based on a single village with no clear systematic regard, through the process, for the impacts on the reliability, operability or effectiveness of bus services.

To date, notwithstanding many very welcome stated goals to improve public transport, the Council administration has not succeeded in conceiving or bringing forward a single intervention on Oxfordshire's public highway, that serves to advantage buses, or more broadly assist in making bus services faster and more reliable.

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Part of the Go-Ahead Group

The National Bus Strategy for England, "Bus Back Better" makes plain the Government's expectation of this, applicable to all transport and highways authorities. The Oxfordshire Bus Service Improvement Plan (BSIP) and its supporting Statutory Enhanced Partnership (EP) has these objectives front and centre.

The Council also has an ambitious policy agenda that seeks to radically reduce car-borne trips by 2030, with improved and more attractive bus services being the key to securing the headline policy objective.

Thus far, all the Council's actions delivered to date have consistently served to make bus services slower, less attractive, less reliable, and less punctual. It is still more concerning that in the rural areas where bus services are most marginal, and where they most need to be positively transformed to secure any material reduction in current exceptionally high levels of car dependency, the ill-considered and simplistic implementation of 20mph speed limit substitutions is progressing at speed, without any apparent clear or consistent regard to the impact on rural bus services.

Nor, apparently, is there any clear evidence as to how consistently effective the policy could be, having regard to the local context and nature of the roads concerned, nor, in the absence of these new limits being consistently enforceable, what significant benefits will accrue to vulnerable road users.

The proposals

The proposals involve the substitution of the existing 30mph with a 20mph limit in its entirety.

Where bus services are concerned this involves a road loop that is about 2350m long, linking to two priority junctions spaced about 350m apart on Burcot Lane outside the village. The western half of the loop is referred to as Wimplestraw Road, the eastern as Fane Drive.

There are no fewer than 8 bus stops on this loop, being one about every 300m. This is typical for built-up areas.

Justification for the proposals

The proposals have been made to address unspecified "safety issues" on the roads concerned. There is no evidence presented that there is a serious issue with safety on these roads. The principles of the Stockholm Declaration, that underpinned the original Cabinet decision to pursue the 20mph policy, makes clear reference to the presumption that this should be pursued where there is a significant amount of planned mixing between vulnerable road users and motorised traffic.

We dispute, from first principles, that significant levels of interaction take place between vulnerable road users and pedestrians on Fane Drive on the east side of Berinsfield. The nature of Fane Drive here presents a materially different situation to the road loop through the western part of the settlement.

Wimblestraw Road, forming the west side of the distributor road loop, runs past the main facilities in the settlement, including the primary school, which lies within the loop. The road has built development on both sides. There is a clear need for residents living on streets to the west to cross it to reach these facilities. Reciprocally, there is a clear demand from residents living east of Wimblestraw Road to cross it to reach the main bus stops on the A4074 beside the settlement, served by our River Rapids X40 service. Finally, a convenience store also exists north of Fane Drive at the top of Wimblestraw Road, requiring many residents to cross the road to reach it. It is evident that significant interaction exists between motorised and non-motorised users, including children on this stretch. We accordingly recognise that 20mph could be justifiable in this western area of the settlement.

Fane Drive East and south of Tower Road at the employment area, presents an entirely different picture. It runs outside the built development entirely, on the eastern edge. For most of its length north of it has no direct frontage access, and north of Wey Road, many dwellings are oriented such that they do not face the road. There is no reason to cross the road at all, as there are no evident desire lines to any destinations or links to the east, nor even any public rights of way. There is a strip of narrow green space, but this has no obvious formal or informal recreational function. All bus services operating around the loop operate anti-clockwise, meaning there is not even any need to cross the road to reach a bus stop.

On the contrary, the whole settlement was intentionally planned from the 1950s onwards as a new settlement around an extensive central green space area, with all facilities intentionally provided within the distributor road loop, expressly to minimise the need to cross roads to reach them, from as many homes as possible. Further, the development pursued a radical "Radburn" layout in many portions built from the mid-1960s until 1972, which pursues systematic segregates of pedestrian routes from motorised traffic, to the extent that vehicular access to individual curtilages and parking is provided behind dwellings, to obviate mixing even at the dwelling level.

The effect of this is that logical walking and cycling routes within most of the eastern portion of the community need not cross streets accommodating motorised traffic at all. This includes all the residential area in the northeast and eastern quadrant of the settlement, served by Fane Drive east of Tower Road. Not only are these pedestrian links to the facilities quiet and traffic free – in the vast majority of cases they are also more direct than walking adjacent to trafficked streets. While Fane Drive has a footway on its western side, this is principally to provide access to front doors on those plots that do directly address the road.

Anticipated effects of the proposals on Fane Drive East

Fane Drive itself is a purpose-built distributor road being about 7.3m wide, also serving the small employment area. It is aligned on two straight axes with a gentle bend between them. There is no visual friction offered by verge trees or built development close to the carriageway. Indeed, the visual appearance of the settlement from the road could be reasonably described as bleak in many places, reflecting purposeful design to

minimise animation along it. Forward visibility is excellent, also reflecting the design orthodoxy. There are no pedestrian crossings provided, again, reflecting the complete absence of reasons to cross.

The road is fitted with numerous speed reduction features, as is Wimblestraw Road, making plain that there has long been difficulty enforcing consistent speeds less than 30mph. Typically a road engineered in this manner would have been subject at opening to a 40mph limit, and this might well have been the case here. Irrespective, it stretches credibility to suppose that simply signing a 20mph limit on the full length of Fane Drive, will be likely to have the effect of materially altering driving behaviour, especially on this portion.

Even if it did, all the evidence points to the fact that there are negligible vulnerable road users interacting with vehicular traffic on this stretch, who would benefit from this.

The only practical effect of so extensive an imposition of a 20mph limit, including on Fane Drive, would be to needlessly slow down buses on the loop. That in turn will work, in combination with the widespread imposition of 20mph limits in villages and other settlements on the line of the services concerned, to make current timetables inoperable on a legal basis.

As it is, the highway loop around Berinsfield is only served by two services, of which service 45 is the most significant, running relatively infrequently between Cowley and Abingdon every 60 minutes. X40 does not serve Berinsfield, even with a 30 mph limit in place, as the time penalty that would be incurred on the principal inter-urban corridor in serving the loop – in total nearly 3km from the Berinsfield Roundabout and back - would represent an unreasonable delay to the vast majority of through passengers, that cannot be justified.

Service 45 could still serve Berinsfield by eliminating the loop around the village, since residents could still access the service as they do today, using the stops on the A4074 used by the X40. Such an outcome, of course, would most disbenefit users in homes off Fane Drive on the far eastern side of the community, for whom the walk to the far west would be a significant inconvenience.

More likely, if the County Council cabinet and Parish Council are insistent that the entire loop is implemented at 20mph as proposed, much of the detriment could be offset by the radical reduction in the number of bus stops observed, probably retaining 2, or at most three, within the settlement itself. In such an eventuality, we would invite members of the Parish Council to instruct the County Council which stops on the 45 service should be removed within Berinsfield as a consequence of the introduction of this substantial section of 20mph speed restriction.

The position of Oxford Bus Company and Thames Travel

The companies reiterate their support in principle for the 20mph policy, subject to its proper implementation balancing properly the benefits, identifiable risks, and likely wider negative outcomes, where these are foreseeable, for public transport.

While the application of a 20mph on Wimblestraw Road and the northern part of Fane Drive might be justifiable, albeit problematic for bus scheduling, we formally object to the Draft Orders inasmuch as they relate to Fane Drive, east of Tower Road.

We consider the Orders to be ineffective in achieving the stated aim, arbitrary, unevicenced and unenforceable. The sole practical outcome that we consider a reasonable person can envisage, would be to make service 45 inoperable on its current timetable. As such the only way to maintain the current broadly hourly service between Berinsfield to both Abingdon and Cowley, would be at the very least to observe only three stops on the street loop around the settlement. Even this may still not be sufficient to offset the additional running time, and we may well need to withdraw the service from the settlement entirely, or work with the County Council as the tendering authority for the service to devise a revised timetable, operating to a reduced frequency, or omitting some other sections of route in order to claim back the lost time.

It is very regrettable that we find ourselves having to make a public objection in this way. This situation could easily have been avoided by Council officers through suitable engagement with us in advance.

We nevertheless invite the Council to withdraw the current Draft Orders and engage positively with us in order to arrive at a proposal that achieves the full range of Council transport policy objectives, rather than directly undermining those relating to public transport.

Yours sincerely

Managing Director

Survey of bus journey times at Berinsfield – Route 45

Date: 7 August 2024

10.09 Service from Kennet Close

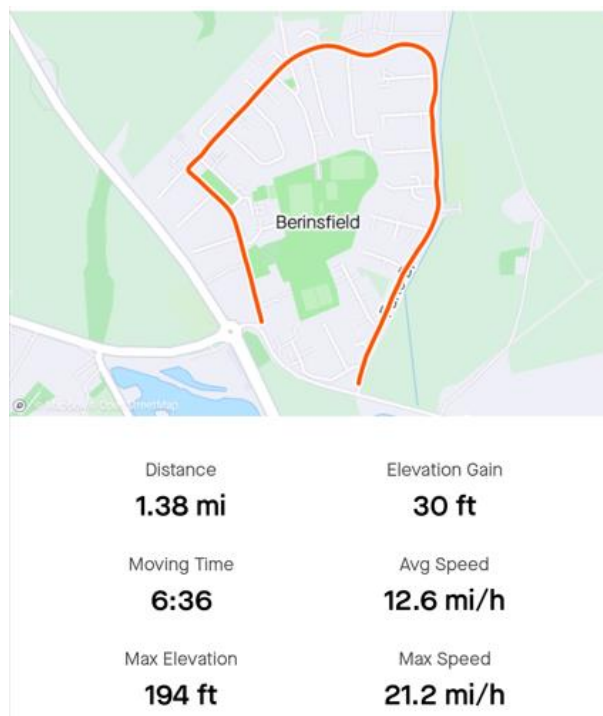
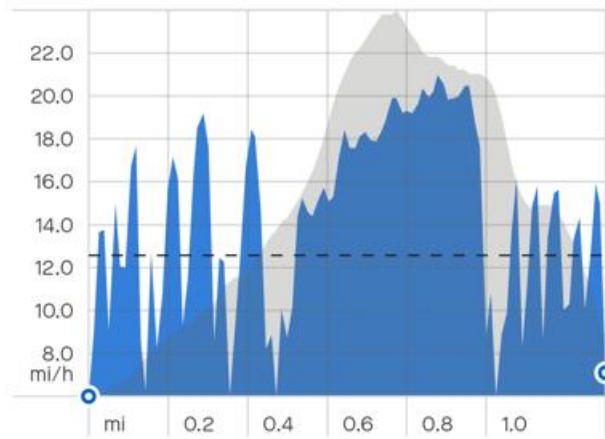


Fig. 1 Recorded route plot

Speed



Avg Speed **12.6 mi/h**

Max Speed **21.2 mi/h**

Moving Time **6:36**

Elapsed Time **7:35**

Fig. 2 Speed v distance along route

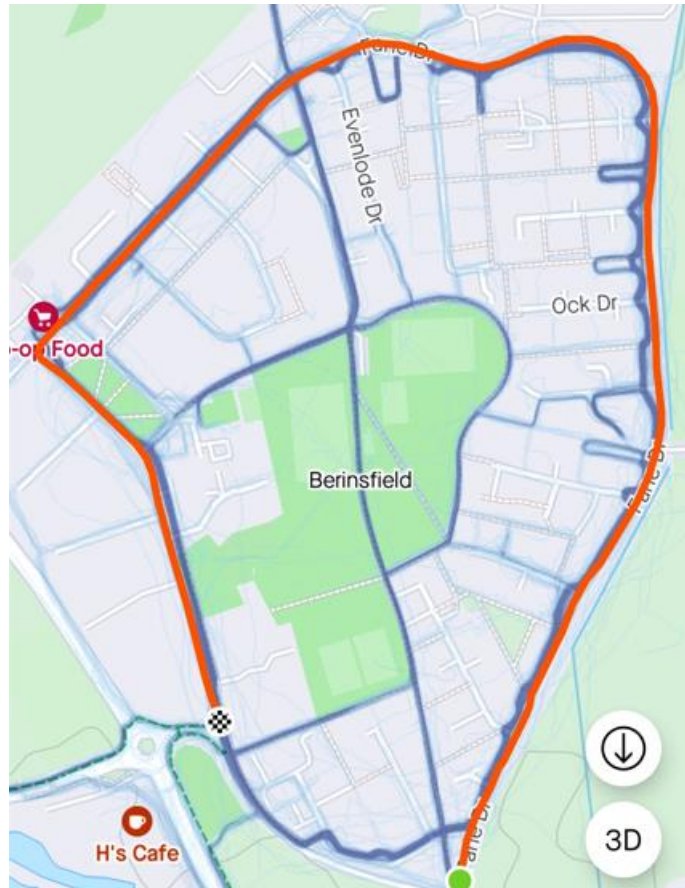


Fig. 3 Detail of route

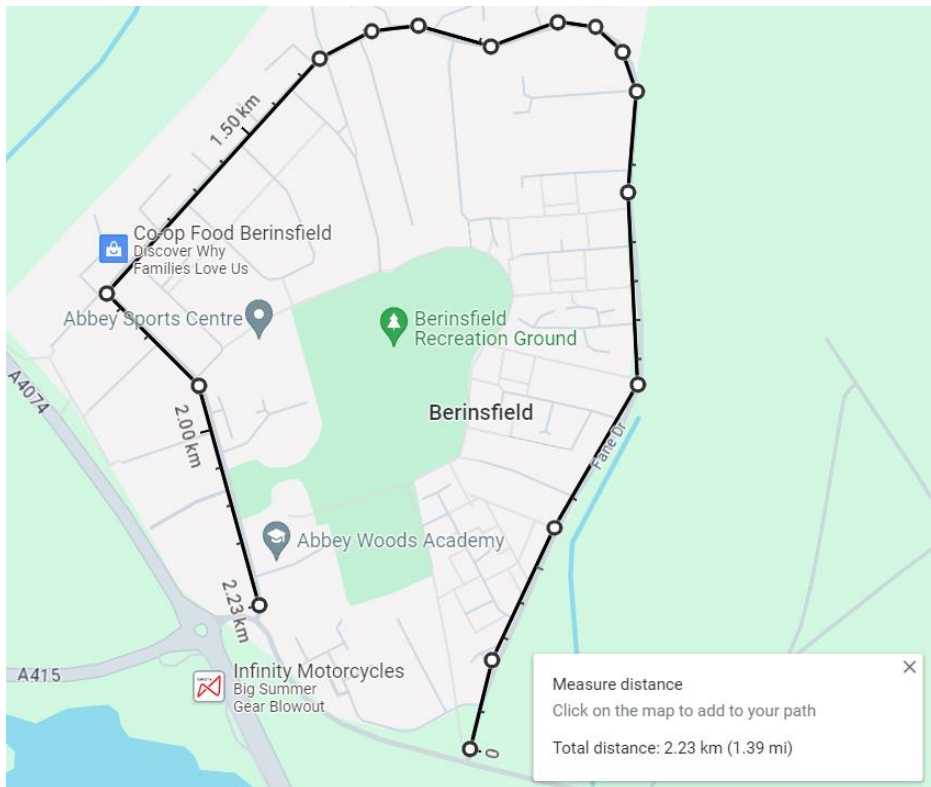


Fig. 4 Distance check from Google Earth

Bus Service 45														Distance	
		Time		Movingtime (secs.)	Stopped time (secs.)	Timetable	Time		Movingtime (secs.)	Stopped time (secs.)		Timetable	(m)	(miles)	
Enter Fane Drive (start of 20 zone)		10:15:05					11:18:50								
Kennet Close	Stop Start					10:09:00						11:18:00	120	0.07	
Chiltern Close	Stop Start	10:16:33 10:16:58		00:01:28	00:00:25	10:09:00						11:18:00	270	0.17	
Leach Road	Stop Start					10:10:00	11:20:42 11:21:25	00:01:52		00:00:43		11:19:00	215	0.13	
Colne Drive	Stop Start	10:18:07 10:18:19		00:01:09	00:00:12	10:11:00	11:22:07 11:22:35	00:00:42		00:00:28		11:20:00	195	0.12	
Pritchard Close	Stop Start	10:19:16 10:20:11		00:00:57	00:00:55	10:13:00						11:21:00	475		
Crutch Furlong	Stop Start					10:13:00						11:22:00	220	0.14	
Health Centre	Stop Start					10:14:00						11:22:00	195	0.12	
War Memorial	Stop Start					10:16:00						11:24:00	360		
Exit Wimblestraw Road (end of 20 zone)		10:22:30		00:02:19		10:16:00	11:26:25	00:03:50				11:25:00	195	0.12	
Total		00:07:25		0:05:53	0:01:32	0:07:25	00:07:35	0:06:24	0:01:11	0:07:35	00:07:00	2245	1.39		