

Divisions affected: *Hanborough & Minster Lovell*

## **DELEGATED DECISIONS BY CABINET MEMBER FOR TRANSPORT MANAGEMENT**

**18 JULY 2024**

### **CRAWLEY – PROPOSED 20MPH SPEED LIMITS**

**Report by Director of Environment and Highways**

#### **RECOMMENDATION**

The Cabinet Member is **RECOMMENDED** to:

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

#### **Executive Summary**

1. The report presents responses to a statutory consultation on the proposed introduction of 20mph speed limits at Crawley 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, with proposed changes to existing Traffic Regulation Orders governed by the Road Traffic Regulation Act 1984 and other associated procedural regulations. Failure to adhere to these statutory processes could result in the proposals being challenged.

#### **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 Crawley by making them safer and more attractive.

## **Formal Consultation**

6. Formal consultation was carried out between 15 May and 07 June 2024. A notice was published in the Witney & West Oxfordshire Gazette 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, West Oxfordshire District Council, the local District Cllrs, Crawley, Hailey, Minster Lovell, and Curbridge & Lew Parish Councils, and the local County Councillor representing the Hanborough & Minster Lovell division.

## **Statutory Consultee Responses:**

7. Thames Valley Police re-iterated their views concerning OCC's policy and practice regarding 20mph speed limits and wish their response to be listed as 'having concerns' rather than an objection.
8. Oxford Bus Company offered no objection citing that bus services do not serve any of the roads affected.

## **Other Responses:**

9. Eleven further responses were received from local residents/members of the public & local Cllrs, with two objections (18%), and nine in support (82%).
10. The responses are shown in full at **Annex 2**, and copies of the original responses are available for inspection by County Councillors.

## **Officer Response to Objections/Concerns**

11. The main purpose of the scheme is to encourage greater use of active travel by reducing speeds; this will also reduce accidents. The aim of reducing speed limits is to change driver's mindsets to make speeding socially unacceptable and make more environmentally friendly modes of travel such as walking and cycling more attractive – and also reduce the Counties carbon footprint. This forms part of a countywide programme of works that seeks to deliver 'a safer place with a safer pace'.
12. The concerns of Thames Valley Police comprise observations applicable to the overall 20mph project but no site-specific comments relating to the proposals for Crawley.
13. The authority considers objections along the lines of it being unjustified, anti-car, a waste of money, not enforceable or pointless to not warrant amendments to a proposal. As such the authority has not addressed any specific comments made of this nature in this report. Both objections received cited the concerns

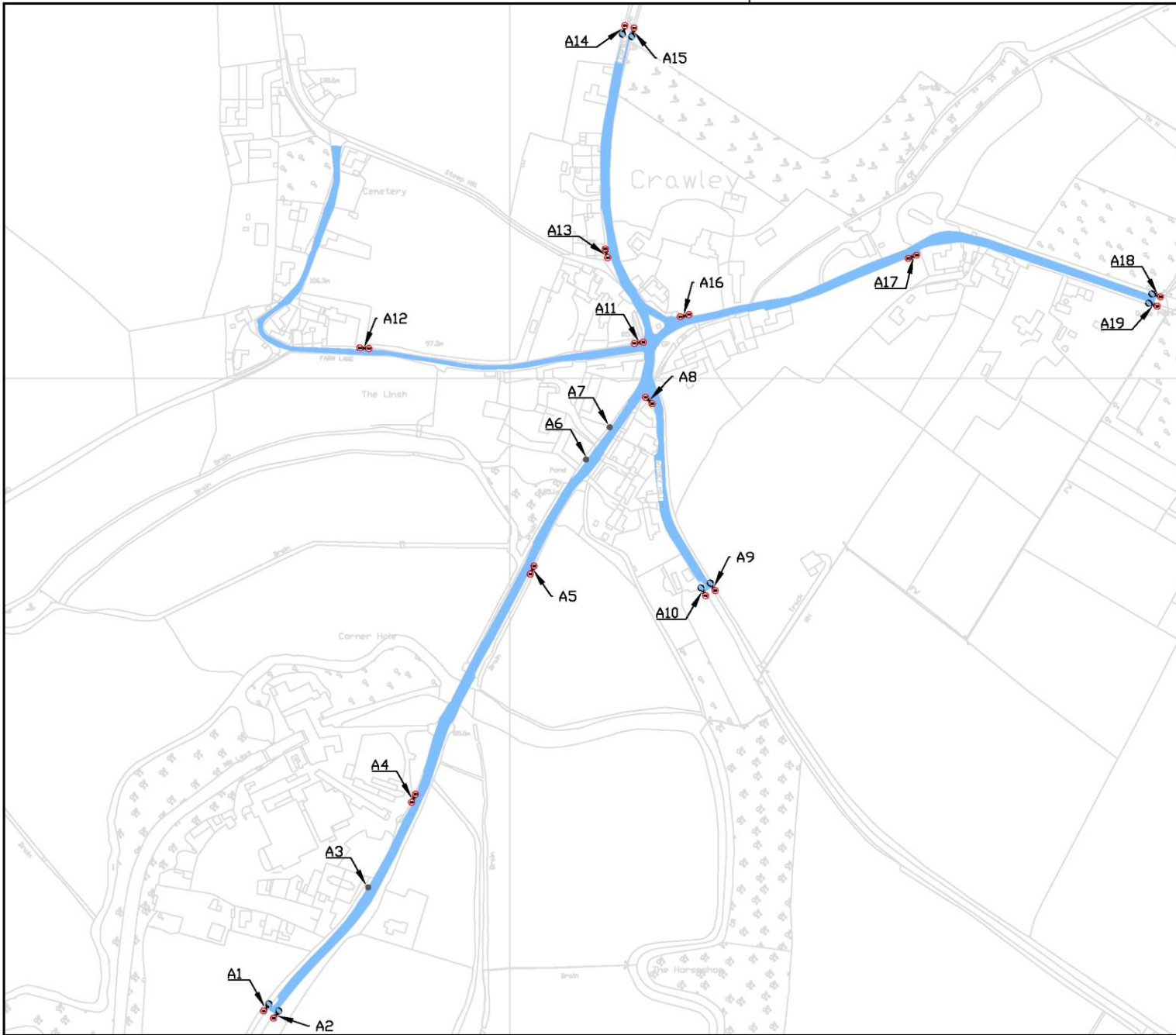
as listed above, although one specifically also requested – should the scheme be approved – that the current proposed repeater sign labelled A12 on the plan in Annex 1 is not proceeded with to avoid visual and environmental intrusion in the verge at this location. While officers will review the exact siting of this sign so as to minimise any such impact, it is considered that a repeater sign in this general location is required to ensure that the speed limit (if approved) is signed in accordance with national guidelines.

**Paul Farmer**  
**Director of Environment and Highways**

Annexes                      Annex 1: Consultation plan  
                                      Annex 2: Consultation responses

Contact Officers:            Anthony Kirkwood (Team Leader – Vision Zero)  
                                      Matt Archer (Portfolio Manager - Programme Delivery)

July 2024



Drawing No. \_\_\_\_\_

Notes:

Proposed 20mph Limit

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Rev.	Date	Purpose of revision	Drawn	Checked	Approved

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 Crawley 20mph

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 Sheet A

Drawing Status

Scale @ A3	Drawn by ER	Checked by GJB	Approved by GJB
	Date drawn 13/02/24	Date checked 14/02/24	Date approved 14/02/24

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Drawing No.	Revision

RESPONDENT	COMMENTS
(1) Traffic Management Officer, (Thames Valley Police)	<p><b>Concerns</b> - Thank you for the consultation documents, in relation to the proposed speed limit change.</p> <p>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 (<a href="http://www.gov.uk">www.gov.uk</a>)) 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"> <li>• history of collisions</li> <li>• road geometry and engineering</li> <li>• road function</li> </ul>

	<ul style="list-style-type: none"> <li>• composition of road users (including existing and potential levels of vulnerable road users)</li> <li>• existing traffic speeds</li> <li>• road environment</li> </ul> <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, (Oxford Bus & Thames Travel)	<p><b>No objection</b> – bus services do not serve any roads affected.</p>
(3) Local resident, (Witney/Crawley, Foxburrow Lane)	<p><b>Object</b> - There has been no evidence to show there is a problem in Crawley that requires a 20mph speed limit being put in place. There is also no evidence to show that drivers adhere to that limit when it is imposed and the Police are not enforcing it. From my own experience when driving at 20mph, it encourages other drivers to pull out on you, as they think they can make the gap, and also pedestrians to suddenly cross the road, again thinking they have enough time. Please take note of the change of strategy by the Welsh government. Changing Crawley to a 20mph zone is a complete waste of council budget that should be spent in other, more valuable ways.</p>
(4) Local resident, (Crawley, Farm Lane)	<p><b>Object</b> - ' I have lived in Crawley my whole life. There is no need for a 20mph speed limit. This will not "promote alternative modes of transport" in this location, nor will it in any way "improve the local area and everyday lives" - on the contrary it will harm the everyday lives of the residents as I'll outline in my next paragraph. Neither will it "help reduce casualty rates and improve road safety" when there have been no casualties in the village and a simple speed limit change does not directly affect road safety; an unsafe driver remains unsafe whether driving at 30mph or 20mph. Indeed one may suggest that an unsafe driver at 20mph may feel more complacent in their perceived inherent safety</p>

and hence be more susceptible to distraction, which would represent an increase in danger in a residential area especially with the reduced following distance likely between vehicles owing to the lower speed.

In Crawley, the 20mph speed limit will increase congestion due to the extra time taken to pass through the village (assuming some drivers actually do comply). It will increase noise and pollution due to vehicles having to run in a lower gear and remain in the village for a longer period of time. I feel it will do nothing whatsoever to improve pedestrian safety or to make areas "more relaxing"; my experience in other places with 20mph limits has been quite the contrary, as it is harder to find a gap in the slower and more persistent traffic to cross the roads when desired; you are more constantly surrounded by traffic as the volume disperses at a rate a third slower than before (again, when compliance does occur).

On that note, compliance with 20mph limits nationally and certainly in West Oxfordshire seems to be virtually non-existent; I've even observed TVP patrol cars travelling (without blue lights) at 30mph in the new 20mph zones through Charlbury and Witney! One wonders whether this proposal and consultation is really required, when an observation of traffic habits in the new 20mph zones in WODC will reveal the majority consensus and the likely effectiveness of this scheme. (It's equal parts laughable and lamentable that the OCC's "Statement of Reasons" document expresses a "belief" that compliance will increase as more of these zones are launched! I don't consider a loose "belief" without any explanation of its origins is a good enough reason to support the imposition of change on a community.)

There is certainly a vocal contingent of people who genuinely consider in good faith that a 20mph limit will deliver positive effects with minimal, if any, drawbacks and I believe this is the contingent established in Crawley. I respect their views and I believe they would respect mine and we could engage in a respectful debate. There is certainly also a vocal wider contingent of people who are pursuing 20mph limits due to a more cynical, politically motivated, anti-motorist view and I hope they are not in any way involved with the proposal in Crawley. But above either of these two groups, sits the majority who do not want a 20mph limit, perceive no need for it on the evidence available, will not comply, and are increasingly prepared to begin taking the second group in particular to account for the damage being done to the peace of local communities, the road network's efficiency, and by extension the economy. I decree this based on my own observations of compliance within 20mph zones and my conversations with my business connections and networking groups in Witney.

Unless OCC is able to demonstrate with evidence - not a "belief" - that 20mph schemes in similar rural locations (Crawley is approx. a half hour's walk or 10 minute's cycle to Witney, up steep hills, for an able-bodied person) - have actually led to more people walking and cycling and have actually reduced road noise and improved air quality (the latter points having evidence to the contrary in many locations) then I deem this proposal to hold no merit.

Were OCC to be serious about improving road safety, noise, and air quality in Crawley, there would be more pragmatic ways to do so by focusing on traffic flow and direct pedestrian safety, for example:

- Widening (or at least properly repairing!) the footpath on the causeway along Dry Lane; implementing a low dividing barrier between the roadway and the footpath
- Consideration of the situation concerning pavement parking in the village centre, opposite the war memorial, which blocks the footpath and roadway and has caused near misses due to the restricted visibility for traffic approaching from Dry Lane
- Removing the speed bump from Dry Lane such that traffic could flow smoothly and predictably through the village at a more constant speed and residents would no longer be subjected to the sound of traffic slowing and accelerating again

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Addendum - Comments on the Scheme's Implementation, if it is Approved

The Consultation Plan document appears to show a new 20mph repeater sign on Farm Lane (point A12). If the 20mph limit is implemented, then I would request that this repeater sign A12, if that is what it is, is excluded from the build scheme. Deploying a new sign at this location (A12) will be detrimental to the visual appearance of the lane with its grass verges, wild flowers, and stone walls and will in my opinion serve no useful purpose. (Note that were the sign to be affixed to the existing wooden telegraph pole in the vicinity and not require a new metal pole then I would be marginally more supportive of it.) Arguably it would be more appropriate were A12 to instead receive a triangular "pedestrians"/"children playing" or even "sharp bend" sign (again on the telegraph pole) as these are the primary risks at this location; this would inform drivers there is an actual need to modulate speed ahead.

Nonetheless, there is no repeater at this location at this time and it is unclear why one should now be required when the only material change would be the village speed limit, which is not specific to the lane. The road is a single track lane, approaching a blind 90-degree bend uphill which already requires the driver to slow to walking pace. The road ends in a dead end shortly afterwards. The majority of the vehicles using the lane are residents. I mean to say that Farm Lane from the point A12 onwards is effectively self-regulating as a speed above 20mph is not in fact attainable, and certainly not until well past the bend, i.e. A12 is an inappropriate location for a repeater sign which is normally used to remind drivers of the speed limit, in locations where they might reasonably believe the limit has been increased in the distance they have travelled, or is about to be increased.

I am satisfied with the rest of the layout shown on the Consultation Plan including the other repeater signs which appear appropriate and proportionate, presuming the new repeater A11 at the bottom of Farm Lane would be



	attached to the existing signposts - any new sign post, e.g. on the verge beside the steps up to the Lamb, could potentially obscure the junction when exiting Farm Lane, particularly when vehicles are parked on the pavement there.
(5) Local Cllr, (Crawley, Foxburrow Lane)	<b>Support</b> - Crawley village roads are mainly narrow lanes with no pavements so introducing a 20 mph speed limit will make the roads safer for pedestrians.
(6) Local Cllr, (Crawley, Farm Lane)	<b>Support</b> - Request consideration for active speed signs to be sited on Dry Lane in particular
(7) Local resident, (Crawley, Leaffield Road)	<b>Support</b> - Crawley village is one of the few places where the 20mph limit should be implemented. The volume and speed of traffic through such a small village, with largely no pavements, has been getting more and more dangerous over recent years. I cannot understand why Witney has had this speed limitation implemented ahead of places like Crawley.
(8) Local resident, (Crawley, Leaffield Road)	<b>Support</b> - Crawley has very few pedestrian paths and therefore pedestrians often have to use the roads. Slowing the traffic will help prevent road traffic accidents to the residents and any visitors. We have many visitors as Crawley is on a rambling walk.  My only surprise has been why Crawley was so far down the list to implement the 20mph limit. The traffic through Crawley has increased on a log scale, slowing the traffic may make some of the traffic use another route.
(9) Local resident, (Crawley, Farm Lane)	<b>Support</b> - The roads and volume of are such that 20mph is the maximum speed any vehicle should be travelling at here.
(10) Local resident, (Crawley, Farm Lane)	<b>Support</b> - Very much support this proposal. Crawley continues to suffer heavy (rat-run) type traffic through its narrow roads. What is needed is another river crossing.  In addition to this proposal, would suggest some form of traffic management is needed at the top junction with dry lane and the old A40 road to Burford. Delays here are becoming a real problem during rush hour times.

(11) Local resident, (Crawley, Farm Lane)	<b>Support</b> - I regularly experience people driving over the speed limit through Crawley and find it dangerous when trying to pull out of Farm Lane.
(12) Member of public, (Crawley, Dry Lane)	<b>Support</b> - Since there are no footpaths and no space for any, it is essential for the speed of traffic to be slow for the safety of pedestrians.
(13) Member of public, (Long Hanborough, Hurdeswell)	<b>Support</b> - The roads are not adequate to cope with the volume of traffic travelling at 30 mph - narrow with poor visibility in places and virtually no footpaths.