

Divisions affected: *Witney West & Bampton*

DELEGATED DECISIONS BY CABINET MEMBER FOR TRANSPORT MANAGEMENT

05 SEPTEMBER 2024

DUCKLINGTON - 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 Ducklington, as advertised.**

Executive Summary

1. The report presents responses to a statutory consultation on the proposed introduction of 20mph speed limits in Ducklington, 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 to encourage walking and cycling within Ducklington by making them safer and more attractive.

Formal Consultation

6. Formal consultation was carried out between 12 June and 05 July 2024. A notice was published in the Witney 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, local District Cllrs, Ducklington Parish Council, Witney Town Council, and the local County Councillor representing the Witney West & Bampton 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. Pulhams Coaches offered no formal objection; however, they did raise concerns that if the proposals are implemented as proposed, the No.15 & No.19 bus services would be at the point where reliable operation would no longer be operationally feasible. The response is shown in full at **Annex 3**.
9. Ducklington Parish Council confirmed their support for the proposals but requested for the 20mph speed limit to include Standlake Road due to the presence of residential properties and an entrance to the sports field.

Other Responses:

10. A further 13 responses were received via the online survey during the course of the formal consultation, comprising of: seven objections (54%), two in support (15%), three partially supporting (23%), and one non-objection.
11. Those who responded online, were also asked whether if the 20mph speed limit proposals were implemented, would it likely influence a change to their mode of travel in the area, with one stating that they would consider walking/wheeling more and 12 saying "No".
12. The responses are shown in **Annex 2**, and copies of the original responses are available for inspection by County Councillors.

Officer Response to Objections/Concerns

13. The main purpose of the scheme is to encourage greater use of active travel by reducing speeds; this is also expected to 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



Drawing No. _____

Notes:

- Proposed 20mph limit
- Existing 30mph limit

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Rev.	Date	Purpose of revision	Drawn	Checked	Approved

OXFORDSHIRE COUNTY COUNCIL
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Project title
 Ducklington 20mph

Drawing title
 General Layout

Drawing Status

Scale @ A3	Drawn by ER	Checked by GJB	Approved by GJB
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Oxfordshire Project No. & File Ref

Drawing No.	Revision

RESPONDENT	COMMENTS
<p>(1) Traffic Management Officer, (Thames Valley Police)</p>	<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 disproportionate 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 • 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>
<p>(2) Managing Director, (Pulhams, Go-Ahead Group)</p>	<p>Concerns – the County Council and indeed all the Parish Councils on the line of the 15 and 19 routes should be advised that if the Ducklington proposal are implemented as proposed, the 15 and 19 services would be at the point where reliable operation would no longer be operationally feasible.</p> <p><i>[See full response at Annex 3]</i></p>
<p>(3) Ducklington Parish Council</p>	<p>Support - Parish councillors would prefer the 20mph speed limit to include Standlake Road as there are a number of houses along the road and an entrance to the Sports field too.</p>
<p>(4) Local resident, (Ducklington, Fielden Close)</p>	<p>Object - Objection to the proposed 20mph limit based upon the poor status of the road surfaces in the village; the poor management of roadside parking on Witney road creating dangerous hazards along its length; the refusal of the County Council to reduce the maximum speed on the A415 passing the village to 50mph with vehicles passing the Aston Road / A415 junction at 60mph or more thus creating a dangerous situation particularly during the busy school drop off and pick-up times Monday to Friday. Previous requests to reduce the speed, to bring this section from Cokethorpe School to the Ducklington Roundabout inline with the rest of the A415 from Cokethorpe School to Abingdon have been declined ?</p> <p>Travel change – No</p>

<p>(5) Local resident, (Ducklington, Fielden Close)</p>	<p>Object - I have witnessed people already driving at the appropriate speed through the village without the unnecessary expenditure of new signage, public consultation or otherwise. Please use the money allocated to fully resurface the road through the village which causes relentless wear and tear on vehicles using the road.</p> <p>Travel change – No</p>
<p>(6) Local resident, (Ducklington, Park Road)</p>	<p>Object - As there has been no accidents reported in Ducklington in the area you propose, I see no reason for the implementation of 20MPH in areas mentioned.</p> <p>Travel change – No</p>
<p>(7) Local resident, (Ducklington, Fielden Close)</p>	<p>Object - You would struggle to do 20mph along witney Road because of traffic parking on the road so you will just be wasting more money on something that does not need doing</p> <p>Travel change – No</p>
<p>(8) Local resident, (Ducklington, Mill Meadow)</p>	<p>Object - Those that speed have no regard for limits . The village has many bends so exceeding the limit is almost impossible</p> <p>Travel change – No</p>
<p>(9) Local resident, (Ducklington, Park Road)</p>	<p>Object - There is no evidence that there has been accidents to put the 20mph signs outside a school I'm 100% behind it, but in regards the rest of the village no reason at all. Also wasting money which could be spent on more productive projects.</p> <p>Travel change – No</p>
<p>(10) Local resident, (Ducklington, Peel Close)</p>	<p>Object - People already drive at the appropriate speed limit. We don't need a nanny state to tell us how to drive safely or the unnecessary expense of new signs and police setting traps to raise their coffers. The council should have used my</p>

	<p>money to reduce speed limits by schools and that is it. The 20 mph everywhere is dangerous, a waste of my money and another way to bash drivers who have no other means to get to and from work due to abysmal A40 and no direct local train or bus services from the village without having to have a car. And why would I ever use the white elephant Eynsham park and ride? Don't waste any more of my money. Improve transport links for me to get around, about and out of the county!</p> <p>Travel change – No</p>
(11) Local Cllr, (Ducklington, Chalcroft Close)	<p>Partially support - The parking is more of a problem than the speed limit.</p> <p>Travel change – No</p>
(12) Local resident, (Ducklington, Lovell Close)	<p>Partially support - A laudable idea, but is it based on evidence about the number of accidents or simply the prevailing obsession with 20mph signs, which are a waste of money as nobody takes a blind bit of notice of them - including the police?</p> <p>Travel change – No</p>
(13) Local resident, (Ducklington, Standlake Road)	<p>Partially support - Vehicles often don't adhere to 30 mile limit on Standlake Road and frequently travel at excessive speed unchecked. Without a camera how would a 20mph limit be enforced?</p> <p>Travel change – No</p>
(14) Local resident, (Ducklington, Standlake Road)	<p>Support - Traffic travels very fast along Standlake Road. It is very difficult to cross the road as traffic comes around the bends very fast. The bends are completely blind. There have been two very nasty accidents between the start of Standlake Road and the Bell. The 30mph limit is exceeded every day. I have substantially impaired hearing and it is difficult to hear cars coming around the bends, particularly electric cars.</p> <p>Travel change - Yes – walk/wheel more</p>

<p>(15) Local resident, (Ducklington, Manor Road)</p>	<p>No objection - Safety - too many parked cars on roadside 20 mph limit is definitely needed.</p> <p>Travel change – No</p>
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c/o Oxford Bus Company
Cowley House
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COWLEY
OX4 6GA

28th June 2024

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

Attn: Christian Mauz

Senior Officer (TRO and Schemes), Network Management
Director of Environment & Place
Oxfordshire County Council
County Hall
New Road
Oxford
OX1 1ND

Dear Mr. Mauz,

STATUTORY CONSULTATION – Ref: CM/12.6.194 - Ducklington proposed 20mph Speed Limits

Thank you for your typically diligent consultation on this proposal.

I refer to the proposed Traffic Regulation Order changes referenced above. Pulhams and Sons (Coaches) Ltd. ("Pulhams") has considered the proposals extremely carefully, both in their own terms and having regard to the context of commitments on all the other settlements on the line of the services concerned.

We must raise substantial concerns, in line with those we have in the past. However, we recognize that officers have attempted to take a balanced approach, that is also consistent with that taken in another very similar context at Standlake a few kilometres to the south.

Given the predicted practical impacts, including cumulative effects of the policy, are not considered to cause a need to restructure the timetable in this case, our concerns are **not** of sufficient magnitude, that we must raise an objection. However, we trust that all stakeholder will note the explanatory narrative we present in this response, because it has a bearing on the roll-out of speed limit reductions elsewhere in the wider area.

1. Background

Pulhams operates the bus service through Ducklington, which is structured as a combination of two routes each operating every 120 minutes, that combine between Witney and the end of

Standlake High Street to provide a broadly hourly frequency. South and west of that point, service 19 continues to Aston and Bampton, while 15 continues to Abingdon via a substantial number of villages, some of significant size, and providing a public transport link that is if anything more strategic, linking two of the County's largest towns and also facilitating a certain amount of movement between two post-16 Further Education sites.

To retain the combined hourly frequency – the minimum necessary for the service timetable to present a credibly relevant choice in Ducklington and Standlake - is a product of quite intricate scheduling. This makes the service even more sensitive to exogenous factors that would serve to make the running time slower, as each limb of the service needs to “balance” such that returning buses to Witney reach Standlake at the same times past each hour. The fact that the extensions are of similar length in running time – 40 minutes from Standlake to both Abingdon and Carterton, allows this to occur.

We should emphasise, very strongly, that these routes are long-standing, but for most of their history, were supported financially by the County Council, and strongly so, given their length and the limited levels of demand from the settlements concerned. The entire budget was withdrawn in Summer 2016 by the then Conservative administration.

At that time the County budget was initially removed, Stagecoach elected to try to maintain the services without support, partly in the hope that as new homes were built the gap between costs and revenue would close. This also involved reducing both services from the previous hourly pattern on each, to the combination of two two-hourly services seen today. This halved resource from four operating buses to two, while initial experience showed that this retained about 67% of the revenue on the services, including concessionary reimbursement. While limiting the rate of losses, patronage did not grow, but rather if anything gradually declined. Thus, even this much reduced service became progressively less financially unsustainable and commensurately more developer funding needed to be applied. Since the public health crisis associated with COVID, any positive trends have been well set back. Pulhams thus now run the service as contractor to the County Council, as we have since 2019, following the acceptance of a public procurement tender.

The fact that all of these villages have grown in the last 8 years, many substantially so, in line with the “presumption in favour of sustainable development” set out since 2012 in national planning policy¹ has directly assisted the continuation of the service to date. This has involved the delivery of a substantial number of affordable dwellings, including for affordable and social rent, representing the largest uplift in affordable housing stock in any of these settlements in a generation or more. This has given rise both to some meaningful extra demand, and, with it, a certain level of developer funding, agreed at a pro-rated level per plot from non-strategic sites. Ducklington itself has seen one of the largest such permissions², with attendant contribution, permitted at appeal at the north end of the village. This has yet to progress to the approval of reserved matters, and is thus yet to be implemented. At the point it does further developer funds will crystallise. However, it must be stressed that the source of developer funding should be assumed to be finite.

¹ Articulated at paragraph 11c) and d) of the National Planning Policy Framework Dec 2023.

² Land East of Witney Road, WODC ref. 21/03405/OUT Appeal ref. APP/D3125/W/22/3297487 decision issued 9th Jan 2023

There has recently been very substantial alteration to the timetable, which has involved:

- Substantial reduction of services to Abingdon to just 5 round-trips a day each way, due to increasing punctuality challenges.
- Increased services to Carterton rising from a single morning and evening peak round trip to 8 journeys a day
- This latter also offering a larger number of trips on the 19 compared to previously

The net cost of maintaining the service, after revenue, is dependent on operating hours more than any other factor. The level of revenue, on its part, is dependent to a very great extent on how far the frequency and journey time offers a relevant choice. Extending journey times directly erodes patronage. Maintaining services that are slower, within the existing operating hours, also involves reducing the number of journeys, while making timetables harder to understand especially for more discretionary off-peak use, also reducing the fares yield. It should be obvious then, that materially slowing buses down has a substantial direct and immediate effect to reduce bus use, and make service harder to maintain, especially in a world where pressure on the public purse is high and likely to rise.

Following several issues whereby a large number of 20mph proposals on key sections of bus routes in Oxfordshire were advanced by the county council following requests from parish councils, which generally had not involved any prior engagement with bus operators, we and Stagecoach, the other principal bus operator in the County, formally objected to several such schemes. This included the major scheme in Abingdon which affected a large number of bus routes (including 15) run by us and the wider Oxford Bus Group, and in Witney, affecting both 15 and 19, and a larger number of Stagecoach services.

After some discussions regarding the process being adopted by the County Council to move forward the “20’s plenty” policy, we agreed with the Council’s Highways Officers that both major bus operators would provide a list of settlements where the council had indicated that a 20mph scheme was planned, where the potential for serious adverse impacts on bus services within that settlement from injudicious blanket substitution of 20mph for existing 30 mph limits existed. Such a list was provided by Oxford Bus Company to OCC on 21st March 2023.

At that time Pulhams was not part of the Group. However, in my recollection, Stagecoach West separately highlighted the fragility of the situation on the 15 and 19 corridor as part of a list it had separately submitted at that time. It had also made representations to previous TRO Orders in Bampton, Aston and Standlake, that fell, as I recall, short of a formal objection, but were intended as information to highlight the practical and policy implications, as far as it was considered appropriate, given that they were not the operator of the routes concerned.

Thus, the issues we highlight above are well known to the Council and have been consistently and repeatedly expressed, in an appropriate and timely manner.

2. Summary of the proposals

The proposals reduce the existing speed limit in the village south of the A415 Duckington Roundabout from 30mph to 20 mph over a 1250m section as far as Aston Road, beyond which a 30mph limit would be retained over a further 900m to the southern junction where the Standlake Road rejoins the A415.

The road is the former A415, which bypassed the village some decades ago. Much of the bypassed section runs through open and semi-rural countryside at the southern end. There is relatively little built frontage with direct relationship to the road, and few side roads. In fact, the relatively recent development east of Standlake Road takes no direct frontage access from it. North of Aston Road the density of development rises, with the built-up extent of the village also found to the west as well as the east. However, the village is quite suburbanised and the form of development fronting Standlake Road reflect this, being twentieth century properties generally well set back from the highway and typically relatively low density. The historic core of the village is further northwest, and as the road passes through the built form reflects a much more intimate form in many places. The road reduces in width, there is more visual friction, and two quite tight bends with limited forward visibility approaching and at Church Road significantly reduce speeds passively and ought to make 20mph self-enforcing.

Key services and facilities, including the primary school and extensive sports fields, lie south of Aston Road at the south end of the village. It is acknowledged that a 20mph southwards to allow safe access to these by active travel modes, is entirely appropriate, despite the much more modern and relaxed development form, including footways set well back from the carriageway on the eastern side.

Towards the north end of the village 120 new dwellings are expected East of Witney Road, as discussed above. There is substantial commercial activity around the Ducklington Roundabout including a foodstore and two hotels. Further development west of the roundabout is also planned. There is a case for a 20mph limit in the light of this, and more generally to ensure that the environment to positively support active travel to reach these destinations is in place.

Substantial employment exists immediately north of the A40 within Witney, well within walking and cycling distance. At the approach to the roundabout a dedicated off-road segregated cycling facility is provided. We are not aware that the promoter of this land has any obligation to further improve the off-road facilities, specifically by providing signalised crossing of the A40 slip road arm. The proposed 20mph limit would terminate exactly where this existing facility begins and would thus provide a continuous quiet/off-road route. It is right that we recognise and support the achievement of this.

3. Effects of the proposals

The practical result of the cumulative impacts of the proposals between Witney through Ducklington, to Abingdon or Bampton is that a very significant proportion of services 15 and 19 will operate at a maximum legal operating speed of 20 mph. Given the need to make regular stops, accelerate and decelerate between them, the actual end-to-end reduction in average operating speed is if anything a little greater in proportional terms, over long distances. It is neither safe nor efficient to seek to compensate for a much lower speed limit by accelerating and decelerating at much greater rates, even if it were achievable.

Between Ducklington Roundabout and Standlake High Street the routes cover 8 km in each direction. Of this length, the combination of approved proposals for Brighthampton, Standlake and Ducklington involve around 2300m at 20 mph. We note positively that the Standlake TRO as proposed and implemented, retained a substantial 950m length north of Standlake at 30mph. The Ducklington proposals follow a similar approach, it must be conceded.

In the light of this and the more detailed previous analysis, it is therefore hard to suggest that a substantially different approach is taken in this instance.

However, separate extensive lengths of 20mph are in place in Bampton, Aston, Marcham, as well as Abingdon and Witney themselves.

The current operating cycle on the 15 to Abingdon is especially tightly timed. Off-peak, 19 enjoys 12 minutes scheduled stand time at Carterton, compared with 10 minutes at Abingdon, off-peak, to address unforeseen variations in journey time. At the Witney end the equivalent is just 4 minutes. As a result, punctuality on the service is already highly challenged, and we have already informed the county council of our view that there is a growing need to make further amendments to the timetable to improve reliability. Given the constraints in vehicle resources, this is likely to mean a further reduction in journeys operated, and these proposals are likely to accelerate this.

We note, positively, that on 17th June 2024, Kingston Bagpuize with Southmoor Parish Council on the 15 route, made public that they have agreed with the County Council, to implement 20mph on certain roads in that Parish. This includes Hanney Road and Draycott Road. However, we note that the proposals are not intended to include the A415 Witney and Abingdon Roads, nor, apparently, the lengthy stretch of the former A420 used as a bus route between Witney Road and the western edge of the Parish. This is important, as the blanket imposition of a 20mph on all roads currently subject to 30mph limits would have a particularly significant impact on bus journey times. We await the formal publication of the relevant Orders, to which we would offer no objection.

Conclusions

In view of our evaluation of the proposals above, having as full regard for the achievement of the County's safety goals as well as wider local and national transport policy, we present no objection in this instance to the 20mph proposals for Ducklington.

However, the County Council and indeed all the Parish Councils on the line of the 15 and 19 routes should be advised that if the Ducklington proposal are implemented as proposed, the 15 and 19 services would be at the point where reliable operation would no longer be operationally feasible.

In such an eventuality, we would have no choice, under the terms of the Transport Act 1985, except to negotiate with the County Council as the procuring party to revise the timetable including, for example truncating or straightening out the service, in order to address the substantially longer end-to-end running times. These changes cannot but tend to make the service progressively less attractive. In the longer term we would expect the principal effect, in terms of mode share, would be to increase cycle use at the expense of bus patronage. There is no evidence that there would be any meaningful reduction in car use, especially given the high commitment to multiple car ownership in each household, which is already evident in most of the rural communities served.

Yours sincerely,

Head of Built Environment and Infrastructure