

Divisions affected: *Thame & Chinnor*

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

**18 JULY 2024**

### **TETSWORTH: 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 at Tetsworth – subject to further engagement with Carousel Buses Limited, Tetsworth Parish Council and the local County Council member.**

#### **Executive Summary**

1. The report presents responses to a statutory consultation on the proposed introduction of 20mph speed limits at Tetsworth 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**

- The proposals would help encourage walking and cycling within Tetsworth by making the roads safer and more attractive.

## Formal Consultation

- Formal consultation was carried out between 23 May and 14 June 2024. A notice was published in the Oxford Times, 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, Tetsworth Parish Council, and the local County Councillor representing the Thame & Chinnor division.

## Statutory Consultee Responses:

- 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.
- Carousel Buses outlined strong concerns regarding the proposals, citing the fragility of the 275 bus service & the potential impacts in particular, the full response can be seen in **Annex 3**.

## Other Responses:

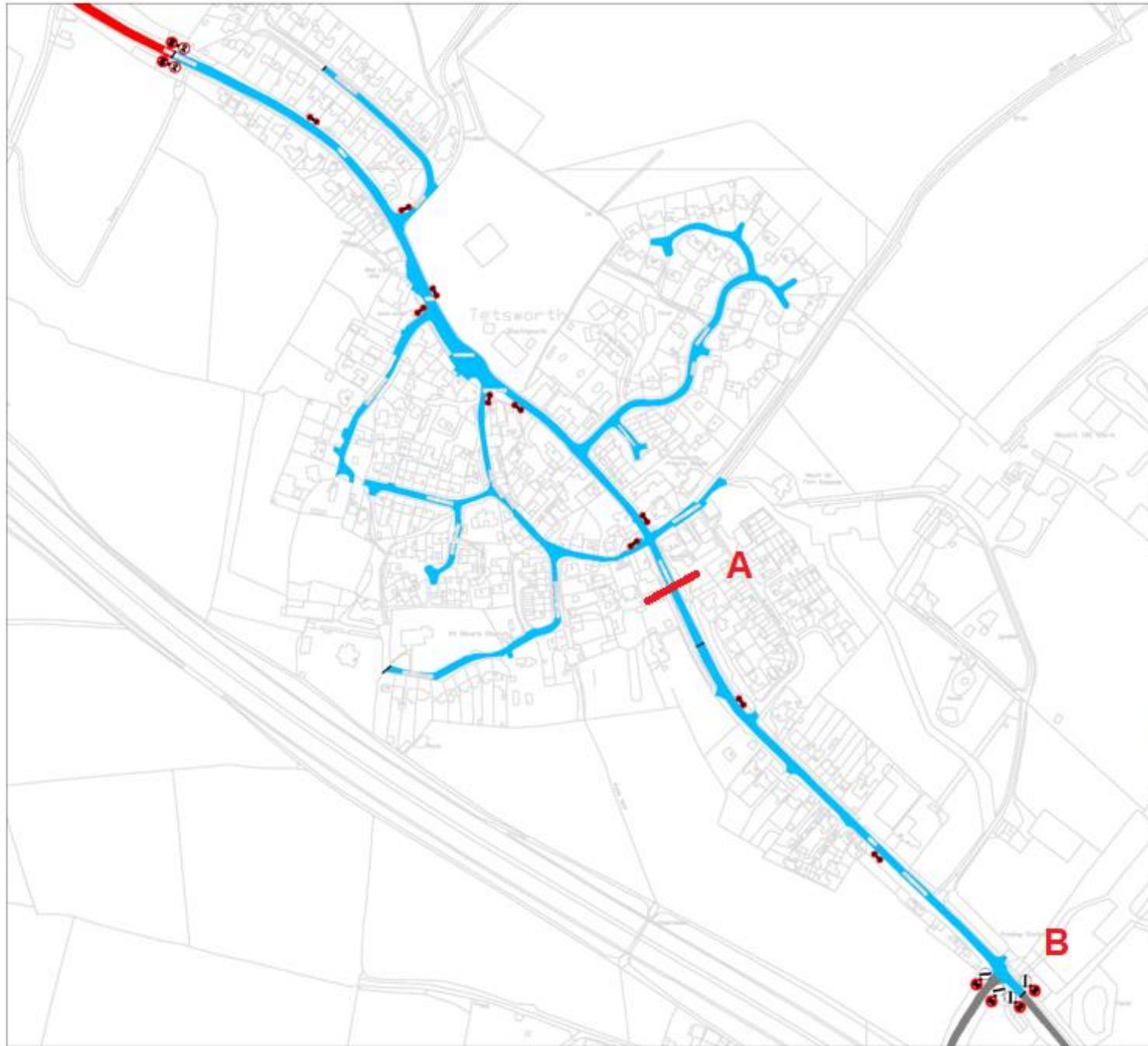
- 21 responses were received via the online survey during the course of the formal consultation, comprising of four objections (19%), one partially supporting, and 16 in support (76%).
- Those who responded online, were also asked whether if the 20mph speed limit proposals were implemented, would it likely influence a change to their mode of travel in the area, the results of which are shown below:

| Travel Change         | Number   |
|-----------------------|----------|
| Yes – walk/wheel more | 5 (24%)  |
| Yes - cycle more      | 1 (5%)   |
| No                    | 15 (71%) |

\* note – all percentages rounded up/down to nearest whole number.

- Additionally, a local resident submitted an email in support of the proposals, however they felt that reinstating the centre-line road markings would be imperative to help improve safety.
- The responses are shown in full at **Annex 2**, and copies of the original responses are available for inspection by County Councillors.





Tetsworth 20mph

| Legend             |  |
|--------------------|--|
| Proposed 20        |  |
| Existing 30        |  |
| Existing NSL       |  |
| Not Public Highway |  |

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| Rev. | Date     | Purpose of revision | Drawn | Checked | Approved |
|------|----------|---------------------|-------|---------|----------|
| 1.0  | 30.08.23 | Proposal 1          | C.R   |         |          |


**OXFORDSHIRE COUNTY COUNCIL**  

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Project title: Tetsworth 20mph Scheme

Drawing title:  
Tetsworth 20mph Scheme Overview

Drawing Status

| Scale @ A3 | Drawn by: C.R        | Checked by: G.JB       | Approved by: G.JB       |
|------------|----------------------|------------------------|-------------------------|
|            | Date drawn: 30.08.23 | Date checked: 18.09.23 | Date approved: 18.09.23 |

Oxfordshire Project No. & File Ref

|                 |              |
|-----------------|--------------|
| Drawing No. 1.0 | Revision 1.0 |
|-----------------|--------------|

| RESPONDENT  | COMMENTS   |
|---|--|
| <p>(1) Traffic Management Officer, (Thames Valley Police)</p> | <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> <li>• composition of road users (including existing and potential levels of vulnerable road users)</li> </ul> |

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|  | <ul style="list-style-type: none"> <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) Managing Director,<br>(Carousel Buses Limited) | <p><b>Concerns</b> – Carousel Buses Limited (CBL) has reviewed the draft orders. We are the County Council’s contractor for service 275, which operates through the village.</p> <p>The Company feels it must raise very strong concerns about this proposal. We believe that, especially given the circumstances surrounding bus operation in this part of Oxfordshire and in this village in particular, the proposals are likely to directly and materially further undermine the ability for public transport to be provided on an effective and economically sustainable basis.</p> <p><i>[Full response available at <b>Annex 3</b>]</i></p>  |
| (3) Local resident,<br>(Tetsworth, high street)    | <p><b>Object</b> – the A40 through Tetsworth is a regularly used relief road for the m40, used due to road works or when accidents occur. As such this stretch of road is part of the major road network. Reducing the speed limit will cause increased congestion and resulting increased pollution to the area.</p> <p>Travel change: <b>No</b></p>   |

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| <p>(4) Local resident,<br/>(Tetsworth, High Street)</p>   | <p><b>Object</b> – The A40 through Tetsworth acts as a relief road when the M40 is closed. The volume of traffic, including the high number HGVs that travel through the village at these times is substantial, as is the amount of exhaust fumes. Making such traffic travel at the much slower rate of 20mph would significantly increase the amount of exhaust fumes emitted within the 20mph zone and significantly increase the health risk to those inside the zone, especially those with lung conditions such as asthma.</p> <p>Tetsworth already has a 20mph zone in the vicinity of the school, activated during school hours, therefore any argument that a village-wide 20mph zone is needed for schoolchildren is null and void.</p> <p>The parish council put Tetsworth forward as a candidate for 20mph on the basis of a handful of likes to a Facebook post and did not do a proper consultation of the village at all. Objections were swept under the carpet as irrelevant. There is no basis whatsoever for a 20mph in Tetsworth. There are no accidents and little speeding in the village. This quest for a 20mph zone does not benefit anyone and actually harms those with respiratory conditions when the M40 is closed. People's health is far more important than the egos of those who wish to push this through with as little consultation as possible.</p> <p>I strongly object to the 20mph zone in Tetsworth</p> <p>Travel change: <b>No</b></p> |
| <p>(5) Local resident,<br/>(Tetsworth, Silver Street)</p> | <p><b>Object</b> – I strongly object to 20MPH limit as in our Village if you drive at that speed, my car has to drop down to third gear. The Village is on the A40 and would cause even more traffic as when there is a problem on the M40, all the vehicles are diverted through Tetsworth. We don't have a regular Bus service so have no choice other than to use the private car.</p> <p>Travel change: <b>No</b></p>   |
| <p>(6) Local resident,<br/>(Tetsworth, Swan Gardens)</p>  | <p><b>Object</b> – There have been no accidents in the 30 MPH zone through the village. There is no reason to reduce the speed limit now.</p> <p>Travel change: <b>No</b></p>   |
| <p>(7) Local resident,<br/>(Tetsworth, Silver Street)</p> | <p><b>Partially support</b> – The A40 that goes through Tetsworth is a diversionary road when the M40 is closed due to Accidents/Roadworks etc. The stretch of road from the Marsh End junction to Milton Common is open countryside and</p>  |

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|   | <p>does not require a 20 MPH speed limit. I agree with the 20 MPH speed limit between Stoke Talmage junction and Marsh End as cars speed very fast through the Village and there is no crossing for the children to cross for the Primary School.</p> <p>Travel change: <b>No</b></p>  |
| <p>(8) Local Cllr, (Lewknor, representing Tetsworth as District Councillor, )</p> | <p><b>Support</b> – There isn't a safe crossing between the bus stops in the village centre (made worse at school pick-up and drop-off times), and also to and from the village green. Also, the primary school entrance is just over the brow of a hill which means crossing there can be hazardous.</p> <p>Travel change: <b>Yes – walk/wheel more</b></p>   |
| <p>(9) Local Cllr, (Tetsworth, Elm Close)</p>                                     | <p><b>Support</b> – Tetsworth straddles the A40 and has no pedestrian crossing. Families have to cross the road to access the village green and play area and children have to cross to their school buses. A number of public footpaths also cross the road, which also has blind spots due to either corners or a hill. A 20 mph limit would significantly reduce the chance of incidents.</p> <p>Travel change: <b>No</b></p>   |
| <p>(10) Local resident, (Tetsworth, High Street)</p>                              | <p><b>Support</b> – The proposal will make Tetsworth safer and reduce the road noise.... it's a 'no-brainer'</p> <p>Travel change: <b>Yes – walk/wheel more</b></p>  |
| <p>(11) Local resident, (Tetsworth, High Street)</p>                              | <p><b>Support</b> – I am concerned by the speed with which motorists drive through Tetsworth. It is dangerous for children walking to school and crossing to use the green/park. There are a couple of blind spots within the proposed 20mph area that would be much safer at lower speeds, such as after the corner near the entrance to Marsh End, and the brow of the hill by the school. However, any new speed limit would need measures to enforce it as many vehicles already do in excess of the current speed limit. The current signs showing your speed have not deterred people from speeding.</p> |

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|  | Travel change: <b>Yes – walk/wheel more</b>  |
| (12) Local resident,<br>(Tetsworth, Silver Street) | <p><b>Support</b> – My son has to cross the road at least 4 times a day on his way to and from school and the speed at which vehicles thunder through the village is quite scary. I believe that reducing the speed limit to 20mph should help and make these drivers think about their speed more and the hurt it could cause should they not be able to stop in time to prevent a collision.</p> <p>Travel change: <b>No</b></p>   |
| (13) Local resident,<br>(Tetsworth, Silver Street) | <p><b>Support</b> – People drive far too fast through the village. It's very dangerous for all pedestrians, particularly children. I'm particularly worried when my own children walk to and from school, and also when they are playing on the village green (which they do frequently). My oldest child also rides his bike around the village, frequently crossing the A40 main road. The village is very busy with pedestrians. I'd also like to see the 20mph enforced (eg speed cameras). If a car doing 20mph hits someone, the outcome will be significantly better than if a car doing 30mph (or more) hits someone. Therefore, 20mph in a busy village is a no brainer?!</p> <p>Travel change: <b>No</b></p> |
| (14) Local resident,<br>(tetsworth, silver street) | <p><b>Support</b> – support</p> <p>Travel change: <b>No</b></p>  |
| (15) Local resident,<br>(Tetsworth, Swan Gardens)  | <p><b>Support</b> – Tetsworth village is divided by the A40 that runs through the middle of built up area. Residents must cross the A40 to access recreational facilities, pubs and social club, the village shop, church, school, public footpaths and children's play area. In particular children cross without supervision or a formal crossing to access the school, play area and shop. The A40 also suffers from a number of blind spots due to corners and hills. A 20mph limit will reduce the risk or injury or death to all members of the community.</p> <p>Travel change: <b>No</b></p>   |

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| <p>(16) Local Cllr (i.e. Town/Parish/District),<br/>(Tetsworth, High Street)</p> | <p><b>Support</b> – Tetsworth is bisected by the A40 and has no pedestrian crossing. Many families must cross the road to access the village green and play area and children must cross to access the school bus service. A number of public footpaths also cross the road, which also has blind spots due to either corners or a hill. A 20 mph limit would greatly reduce the chance of injury or death due to any collision.</p> <p>Travel change: <b>Yes – walk/wheel more</b></p> |
| <p>(17) Local resident,<br/>(Tetsworth, High street)</p>                         | <p><b>Support</b> – I believe slowing traffic through the village can only be positive. Although I feel there needs to be some sort of enforcement as many drivers currently ignores the 30 speed limit</p> <p>Travel change: <b>No</b></p>   |
| <p>(18) Local resident,<br/>(Tetsworth, High Street)</p>                         | <p><b>Support</b> – The A40 through Tetsworth is an accident waiting to happen, especially when traffic is redirected through and at night.<br/>Hopefully the 20mph will bring speed down through the village. I just hope it is policed properly. And this includes tractors, highway maintenance trucks, concrete Lorries and vans who are some of the worse offenders.</p> <p>Travel change: <b>Yes - cycle more</b></p>   |
| <p>(19) Local resident,<br/>(Tetsworth, Marsh End)</p>                           | <p><b>Support</b> – The speed which cars come through particularly when the M40 is closed really concerns me. I have to walk my boys to and from school along the main road in a narrow path.</p> <p>Travel change: <b>No</b></p>   |
| <p>(20) Local resident,<br/>(Tetsworth, Silver Street)</p>                       | <p><b>Support</b> – I believe a majority of drivers are speeding while driving through the village. I feel our children are not safe in the vicinity of the main road. We need the speed down at all times, and we also need crossings and better protect the side walks in the school area.</p> <p>Travel change: <b>No</b></p>  |

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| <p>(21) Local resident,<br/>(Tetsworth, Silver Street)</p>             | <p><b>Support</b> – Speeding traffic through the village</p> <p>Travel change: <b>No</b></p>   |
| <p>(22) Local resident,<br/>(Tetsworth, Tetsworth High Street A40)</p> | <p><b>Support</b> – I live on the high street, many cars and agricultural vehicles fail to adhere to the existing 30mph. It's dangerous for my young family. My hope is that the 20mph limit would force drivers to slow down. The proximity of the school to the road as well as very narrow pavements in places, plus cars parking poorly over pavements marks this lower limit essential. Frequent offenders are the Oxford Tube and The Airline coaches who have no regard for the 30mph. It's dangerous.</p> <p>Travel change: <b>No</b></p>  |
| <p>(23) Local resident,<br/>(Tetsworth, High Street)</p>               | <p><b>Support</b> – I live on the main road and walking along it with my two children daily for school is hugely concerning. Everyday cars fly past without care or attention to the speed limit. I live opposite one of the current 30mph flashing warning signs that are triggered if you are above the limit and everything I am waiting to cross the road, the cars passing are above the limit. We are a village full of your families and children and as such need to have drivers and vehicles at a slower pace. This is also exacerbated if there are any issues on the M40.</p> <p>Travel change: <b>Yes – walk/wheel more</b></p>   |
| <p>(24) Local resident,<br/>(Tetsworth, Parkers Hill)</p>              | <p><b>Support</b> – I would be very pleased to see a 20mph introduced, in conjunction with repainting the road markings in the centre of the High St/A40. They were removed a few years ago, I believe the reason may be that it can make the road seem narrower to motorists, however I feel it allows vehicles to overtake without restrictions where there is limited visibility. My experience of driving in 20 zones is that some impatient drivers overtake, and that 20 on the High Street could increase the number of cars trying to overtake vehicles adhering to the new proposed limit. Also, removing the double white lines removed the restriction of not parking at the side of the road (Rule 240), which can be an issue on parts of the High St, in particular opposite Marsh End (Google street view shows vehicles parked on a bend where double white lines used to be painted <a href="https://maps.app.goo.gl/71stPM549jpNxD1DA?g_st=ic">https://maps.app.goo.gl/71stPM549jpNxD1DA?g_st=ic</a>)</p> <p>In order to improve safety on the A40 with a 20 limit, I feel reinstating the centre road markings would be imperative.</p> |



Please reply to:  
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23<sup>rd</sup> May 2024

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

Christian Mauz  
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OX1 1ND

Dear Mr Mauz,

**STATUTORY CONSULTATION – Ref: CM/12.6.382 - Tetsworth proposed 20mph Speed Limits**

I refer to the proposed Traffic Regulation Order changes referenced above. Carousel Buses Limited (CBL) has reviewed the draft orders. We are the County Council's contractor for service 275, which operates through the village.

The Company feels it must raise very strong concerns about this proposal. We believe that, especially given the circumstances surrounding bus operation in this part of Oxfordshire and in this village in particular, the proposals are likely to directly and materially further undermine the ability for public transport to be provided on an effective and economically sustainable basis.

This will allow the Council – including the Parish Council – to be properly informed at the point these proposals are formally considered for implementation, and expectations properly managed. We set out some important background below, to explain why we believe that the Council would do well, in the light of its own transport policy agenda and recently-reissued national policy guidance, to reconsider how 20mph limits should be applied within Tetsworth.

Since we are a County Council Contractor, on what is effectively its bus service, this response falls short of being a statutory objection. Were this a commercially operated bus service, we would formally object to the proposed Order.

We are again surprised and increasingly dismayed to be faced with this kind of 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, this 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.

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 carborne 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, nor any monitoring programme in place, that offers evidence as to how consistently effective the policy is being, where it has been implemented, or if it could be, having regard to the local context and nature of the roads concerned. In particular - in the absence of these new limits being consistently enforceable - it remains more or less questionable what significant benefits will accrue to vulnerable road users, where the nature of the highway does not itself support consistently lower speeds by self-enforcement.

### **The proposals**

The proposals involve the substitution of the existing 30mph with a 20mph limit almost in its entirety along the A40. This road has long been "detrunked" having been replaced by the M40 motorway. However, as part of the historic London-Fishguard road, and the principal route between London, High Wycombe and Oxford until 1974, it was designed to act a major highway carrying significant traffic volumes, including heavy goods vehicles.

As such it is of generally consistent width exceeding 6.5m, with a relatively straight alignment, and good forward visibility, either side of the historic village core.

The old village is situated on a pronounced rise, and from the east, east of The Mount, the A40 runs through a significant cutting, with properties elevated above the highway. It is apparent that the village core was historically "bypassed" by the coach road forming today's High Street, with the intimate form of the historic settlement expressed on The Mount and Back Street.

Continuing to the west beyond the recreation ground, the village has seen largely unplanned development forming "ribbon development" fronting the A40 on the southern side. By contrast to the north, the cul-de-sac development at Marsh End intentionally turns its back on the A40. There are limited numbers of properties and driveway crossovers.

There is also little parking on the A40, anywhere in the village, as direct surveillance from properties is limited, and there is adequate on-curtilage parking.

Over a period of 50 years, there has been no attempt **of any kind** to alter or reengineer the road to signal its much more local function. In fact, the County Council has not even implemented any protected or controlled pedestrian crossing facilities within the village, along a length covered by a current 30mph limit extending 1.4km. It is quite remarkable that not one pedestrian refuge exists in the village, despite their very modest costs and proven ability to signal and help maintain a 30mph limit. As well as demarcate and protect pedestrians at identifiable places where a desire line crosses a main road. This is pretty strong circumstantial evidence that there have been few pressing road safety

concerns, and that the degree of conflict and threat presented to pedestrians in the village has never excited a need to do so.

The proposals cover the whole village to a 20mph one, within the extent of the current 30 mph limit. The sole exception is at the very far western end of the zone, outside the village built-up area where a 250m buffer is retained at 30 mph. The result is that over 1km of the A40 through the village throughout the entire area where there is any built frontage, will be signed as a 20mph limit.

In this context, we note that the Council has departed substantially from its previous language justifying these proposals. It claims in the Statement of Reasons for this scheme that “the County Council is not introducing ‘blanket’ 20mph zones throughout Oxfordshire...”. It also claims – counter to its own practice – that the initiative is at the initiative of the Parish Councils, who “have been able to request” implementation of these limits.

In fact, the Council has been, and continues to implement 20mph limits through the full extent of villages, where they are currently subject to 30 mph restrictions, with or without the support of Parish Councils, with little or no regard for either appropriateness or effectiveness. To a considerable extent this approach reflects a desire to minimise the costs of implementation since this requires replacement of the minimum number of signs, as well as sending the strongest possible political signal.

Notwithstanding the formal statutory Statement of Reasons, the approach taken in Tetsworth can only be properly and appropriately described as just such a “blanket” approach.

However, this kind of approach is in direct contravention of revised national guidance set out in Department for Transport LTN 01/2013, issued in March 2024. This guidance makes explicit the key principle that 20mph limits need to be self-enforcing – a principle the County’s own policy acknowledges. DfT is clear that distinctions need to be drawn between through roads – especially those with an A- or B-class categorisation that perform a wider movement function, including for bus services - and residential side streets.

This is also reflected by a consistent message being made by the Thames Valley Constabulary in response to the large number of previous similar proposals, where, especially given the lack of intention to take enforcement action unless there are compelling safety reasons to do so, the Force does not support “arbitrary” extensive impositions of 20mph limits.

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 hazardous interactions take place between vulnerable road users and pedestrians on much of the High Street, especially at the eastern and western ends of the current 30mph limit, where relatively small number of properties exist, and there is no evident provision of public facilities on the far side of the road, that would attract a demand to cross.

Volumes of traffic are generally low, and forward visibility is good.

Perhaps unsurprisingly, in the light of the above, Thames Valley Police accidents database indicates that not one incident, fatal, serious or slight, occurred in the village over the 5-year period between 1/8/2018 and 31/7/2023. Thus, it is far from obvious what evidence backs the claim that “safety issues” have been identified in the village.

### **The position of Carousel Buses and the wider Oxford Bus Company group**

The companies reiterate their consistently-expressed 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. This considered approach is one that is strongly advised and expected by Government.

Obviously, we have no objection to the implementation of 20mph limits across residential side streets. In fact, in much of the village it would be both difficult as well as inappropriate to exceed this speed by much.

There might, additionally, be a case to implement a 20mph limit along the A40 in the centre of the village, where there is a much greater pedestrian hinterland to the north and south of the A40, and a cluster of key facilities and businesses, including the Primary School, local shop/pub and Village Hall on either side. There is also an area of extended carriageway pavement immediately west of Back Street that incorporates uncontrolled off-carriageway parking as well as the main westbound bus stop. This adds a small level of conflict with vehicular movements into and out of the parking areas, in a place where there are clear demands to cross the road.

We therefore suggest that a more proportionate, justifiable and effective approach would involve reducing the speed limit over a still substantial 400m length from 38a High Street, just west of the Marsh End Turn, to The Mount/Judds Lane at 76 High Street.

However, it is not clear that a simple "signed" 20mph zone along the full extent of the village will consistently achieve much material speed reduction. The character of the road and the extent of the zone proposed both strongly militate against it. The width and alignment of the road, and relatively low traffic volumes, would actually tend to facilitate overtaking of compliant traffic by offenders with these still remaining at or around the current 30 mph limit. The provision of one or two pedestrian refuge/s east and west of Back Street would have a clear and demonstrable impact on the safety of vulnerable road users ("VRUs"), both directly and in helping to slow traffic.

Where safety risks are concerned, especially for VRUs, we note that over many years, no Council has thought to consider that the main boarding bus stop in the village has no proper kerb upstand nor boarding area compliant with the statutory requirements set out in the Equalities Act 2010, binding on all public authorities. It is practically impossible to deploy a ramp for non-ambulant bus passengers at this stop. The stop has no cage clearway markings, and therefore is prone to perfectly legal, but disruptive parking. We once again invite the County Council to consider how it can be rather more ambitious, and consistent, in applying its "Vision Zero" policy to protect bus passengers, especially those who suffer from life-limiting conditions making them especially vulnerable road users.

As proposed, we consider the Orders to be ineffective in achieving the stated aim, arbitrary, unevicenced and unenforceable.

The sole practical outcome of these proposals that we consider a reasonable person can envisage, would be to directly contribute to make service 275 even harder to operate reliably, and in compliance with the Transport Act 1985, on its current timetable.

We have found it progressively more and more difficult to reconcile the slower operating speeds that have resulted from the application of several County Council policies with the need to operate this route reliably. As a result, we have already had to work with the County Council as the tendering authority on more than one occasion over the last few years, to devise a revised timetable, operating to a reduced frequency, and omitting sections of route in order to maintain as many frequencies as possible, between the main settlements. The most recent timetable, to take effect from 2<sup>nd</sup> June 2024, has truncated the route to run largely between Oxford, Tetsworth and Chinnor only. Currently-provided and long-established regular links towards High Wycombe – which the Neighbourhood Development Plan adopted in 2021 indicates is rather more highly valued as a destination – are effectively dropped. The positioning journeys from the depot in High Wycombe run counter to the direction of demand at the start and end of the day. The new arrangement succeeds in maintaining four journeys per day on the route, but only towards Oxford.

This will clearly reduce the relevance of the bus offer on the length of the 275 route, including in Tetsworth in particular. It needs no real imagination to conclude that with the loss of the Wycombe links, the change will result in significantly lower patronage and revenue, against the fixed costs of running the timetable. This is an excellent example of the kinds of highly corrosive effects on bus availability and use that arises from declining bus productivity – howsoever caused. While the County Council funds this service, ultimately the situation equally undermines the public sector business case for maintaining the facility in Tetsworth and nearby villages on the 275 route.

All this naturally runs entirely counter to the County Councils wider stated ambitions, expressed in the Local Transport and Connectivity Plan, to replace 25% of all carborne movements in the County by at least 25% by 2030.

Notwithstanding this, the Tetsworth NDP prepared by the Parish Council is not shy in presenting very compelling evidence that two-thirds of the adult population leaves the settlement in a car at peak times many if not most working days, and that the population chooses to live in the village as it provides an attractive rural lifestyle, facilitated by the use of personal vehicles – not walking or cycling, or, for that matter, bus use. This being the case, it may be that were the 275 bus service to be further downgraded or even entirely withdrawn – something that would be at the County Council's prerogative, we should stress, rather than our own - it would have minimal or no impact on any but a very few village residents, and as such present less than modest concern to the Parish Council.

### **Concluding comments**

After prior correspondence with the Council earlier in 2024 and a meeting with senior officers in April arising from this, it is very regrettable that we find ourselves once again having to raise public concerns in this way. Given the particular fragility of the 275 bus service this situation is still more disappointing. It could easily have been avoided by Council officers through suitable engagement with us in advance – something that the Council has agreed that it would do on more than one occasion.

We therefore invite the Council to withdraw the current Draft Orders and engage positively with us and its own public transport officers, in the way we understood had been agreed, in order to arrive at a more nuanced, evidence-based proposal that complies with the clear expectations of national policy set out formally in DfT LTN 01/2013, the statutory Network Management Duty, while achieving the full range of Council transport policy objectives, rather than directly undermining those relating to public transport, with little or no identifiable or evidenced wider benefit.

Yours sincerely

Managing Director