

Divisions affected: Faringdon

**CABINET MEMBER FOR HIGHWAY MANAGEMENT
27 APRIL 2023**

**FARINGDON: PROPOSED 20MPH SPEED LIMIT AND ASSOCIATED
SPEED LIMIT BUFFERS**

Report by Corporate Director, Environment and Place

RECOMMENDATION

1. The Cabinet Member for Highway Management is RECOMMENDED to approve the following proposals as advertised but with subsequent relaxations on 2 radial roads as outlined in paragraph 17:
 - a. New 20mph speed limit for Faringdon, and
 - b. Extended 50mph speed limit on the A4095 Radcot Road.

Executive summary

2. The report presents responses to a statutory consultation on the proposed introduction of 20mph speed limits in Faringdon, and the extension of the existing 50mph speed limit on the A4095 Radcot Road by 40 metres in order to help facilitate the 20mph proposals, as shown in **Annex 1**.
3. This report was originally presented to the Cabinet Member for Highway Management on 23rd February 2023 however due to ongoing concerns from the County Councils bus partners the proposal was deferred to enable further discussion to address bus operator concerns. Following a discussion of the proposals between the Council, bus operators and Cyclox, 2 revisions are proposed. As the revisions involve a relaxation of the original advertised proposals there is no need to revert to formal consultation.

Financial Implications

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

Equality and Inclusion Implications

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

Sustainability Implications

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

Formal consultation

7. Formal consultation was carried out between 05 January and 03 February 2023. A notice was published in the Oxford Times 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, Faringdon Town council, and the local County Councillor representing the Faringdon division.

Statutory Consultee Responses:

8. Four responses were received from statutory consultees. Thames Valley Police responded by re-iterating their views concerning OCC's policy and practice regarding 20mph speed limits and consider their response as 'having concerns' rather than an outright objection. Stagecoach and Thames Travel bus companies both objected and provided detailed responses, the Stagecoach submission is particularly comprehensive and merits close study. The OCC Public Transport Development Team's viewpoint aligns closely with that of the bus companies. The local member supports the proposals.
9. The bus operators share similar concerns. While both support the proposals in the central core and residential areas, they believe the proposals to be unduly extensive with safety benefits not equally achieved over the extent of the proposed Order. Stagecoach claims the extended journey times will erode the attractiveness of the service and undermine its sustainability in Faringdon and the whole A420 corridor. Operators urge that the existing 30mph limit is retained along Coxwell Road, probably beyond the Highworth Road junction and certainly beyond Fernham Road. They also ask that the 20mph limit on Park Road stops just south of the pedestrian crossing at Old Sawmill Road.
10. Stagecoach advises that if a similar approach to 20mph limits were applied to other communities along the A420 corridor they would serve notice to withdraw the service entirely from High Street Watchfield, and the loop around Faringdon Town Centre, as this would become operationally unfeasible in its current form.

Other Responses:

11. 30 responses were received via the online survey during the course of the consultation, and these are summarised in the table below:

Proposal	Object	Concerns	Support	No opinion/ objection	Total
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20mph Faringdon	10 (33%)	4 (13%)	16 (53%)	-	30
50mph on A4095 Radcot Road	4 (13%)	2 (7%)	18 (60%)	2	30

12. The local District councillor and 15 members of the public expressed support, four respondents had concerns while nine registered objections. An objection was also received from a member of the public from Witney who railed against the proposal in principle suggesting it was a dark day for democracy and the start of a dystopian future with 20mph signs akin to the 'Z' sign displayed universally across Russia. The following analysis is taken from the 9 respondents who offered focussed objections to the proposals.

Reason	No. of Comments
Unnecessary	6
Designed to increase fines revenue	3
Will not be enforced	3
Will increase driver frustration	3
Will increase danger	2
Increased emissions	2
Increased congestion and delays	1
Waste of money	1

13. Those who responded online (30 responses), 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	4 (13%)
Yes - cycle more	9 (30%)
No	16 (53%)
Other	1

14. The responses are shown in **Annex 2**, and copies of the original submissions are available for inspection by County Councillors.

Officer response to objections/concerns

15. The main purpose of the scheme is to improve road safety and encourage greater use of active travel by reducing speeds; this will also reduce accidents.



Legend

Proposed 20	Blue
Existing 20	Yellow
Not within Highway Boundary	Pink
Existing 30	Red
Existing 40	Green
Existing 50	Purple
Existing NSL	Grey
Not Public Highway	White

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Rev.	Date	Purpose of revision	Drawn	Checked	Approved
1.0	13.11.22	Layout for Consultation	C.R		

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Project title: Faringdon 20mph Scheme

Drawing title: Faringdon 20mph Scheme Overview

Drawing Status

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ANNEX 2

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 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) Local County Cllr, (Faringdon division)	<p>Support – Great news.</p>
(3) Head of Strategic Development and the Built Environment, (Stagecoach Bus Company)	<p>Object – While we accept that there is a case for some extension of 20mph limits beyond the town centre we once again must highlight the effects of this on bus running time, especially when looked at cumulatively. We continue therefore to urge the Council to pursue a more rigorous evidence-based approach in applying this policy.</p> <p>[See full response in Annex 3]</p>
(4) Business Development and Partnerships Manager, (Thames Travel)	<p>Object – Faringdon has good bus service provision including buses up to every 15 minutes on the Stagecoach S6 between Oxford and Swindon and hourly buses on Thames Travel service 67 between Faringdon and Wantage via Stamford in the Vale. Faringdon Community Transport also operate town service 61. The level of service has been steadily built up over recent years.</p> <p>We have no problem with and generally support these proposals where they do not affect bus services. However we are very concerned that the proposals appears to be a blanket implementation of 20mph speed limits on virtually all roads in Faringdon without any consideration of the nature of individual roads and their function.</p> <p>In particular we object to the introduction of 20 mph speed limit along Park Road from the proposed start of the 20mph zone in the south east to the junction of Bromsgrove in the north west. This section of Park Road forms part of the</p>

	<p>A417 and has wide carriageway and pavements. There are few active frontages that would encourage or lead to frequent and planned mixing between vulnerable road users and motorised traffic. Whilst there is a Tesco supermarket on this section of Park Road the frontage is actually on to the supermarket car park rather than directly on to the road. As well as access via Park Road there is also access to the supermarket car for pedestrians and cyclists via the path between Southampton Street and Park Road. Other than the Tesco other businesses along this section of Park Road are geared to motorists or the building trade and so are unlikely to generate much in the way of pedestrian or cycle movements.</p> <p>We also object to the introduction of 20 mph speed limit along Coxwell Road from the proposed start of the 20mph zone in the south west to the junction of Coxwell Gardens in the north east. Whilst the Thames Travel 67 only operates along Coxwell Road twice a day there are many more buses operated by Stagecoach and this is a main transport corridor. Again there are few active frontages that would encourage or lead to frequent and planned mixing between vulnerable road users and motorised traffic.</p> <p>It is important that buses are able to make progress where it is safe for them to do so. Slowing journeys makes bus services less attractive to passengers and would serve to encourage negative modal shift from public transport to private motor vehicles, which is contrary to the council's policies. Ultimately if journey times become too great, either, extra bus and driver resource needs to be added to maintain the same level of service (i.e. increased cost for no increased revenue) or alternatively timetables need to be trimmed so that they can be operated with the existing resource (i.e. reduced revenue from the same operating cost). In either case this could lead to services becoming financially unsustainable and so could lead to service reductions.</p>
<p>(5) Local Resident/Member of public, (Faringdon, Coleshill Way)</p>	<p>20mph - Object Totally unenforceable. The current 30mph limit is ignored by so many people already. There's not enough evidence the 20mph limit reduces accidents or even reduces the speed of traffic.</p> <p>50mph - Concerns No good reasons supported by data to get my support</p> <p>Travel change: No</p>
<p>(6) Local Resident/Member of public, (Faringdon, Elm)</p>	<p>20mph - Object</p>

	<p>The existing speed limit is sufficient as it does not mean that you have to reach 30mph. You just cannot exceed it. Drivers should be driving to a safe speed based on the surroundings anyway based on the highway code, which may be even lower than 20mph during certain times of the day. Therefore lowering the speed limit in order to justify issuing fines under the illusion of safety is not needed. People will choose to drive anyway and making their trip longer will only ADD to pollution and not cut it. I do believe that there are better ways to encourage alternative forms of transport and sustainable travel.</p> <p>50mph - No opinion Extending the limit of 50mph is ok.</p> <p>Travel change: No</p>
<p>(7) Local Resident/Member of public, (Faringdon, Gloucester Street)</p>	<p>20mph - Object It is unnecessary and will lead to increased motorist frustration, which could make the roads more, not less, dangerous for cyclists.</p> <p>50mph - No opinion As previously explained.</p> <p>Travel change: No</p>
<p>(8) Local Resident/Member of public, (Faringdon, Kiln Cottages)</p>	<p>20mph - Object Pointless as it won't be policed. There is very very rarely any sort of police presence in Faringdon. Assume you'll put up speed cameras, so then it becomes a money making venture rather than a safety issue. Try mending the roads instead, that would be good.</p> <p>50mph - No opinion It won't be policed so what is the point? Those who speed will still speed. See comment earlier about speed cameras and making money</p> <p>Travel change: No</p>

<p>(9) Local Resident/Member of public, (Faringdon, Stallard Close)</p>	<p>20mph - Object All ready to much congestion</p> <p>50mph - Object Road isn't residential</p> <p>Travel change: Other Speed more</p>
<p>(10) Local Resident/Member of public, (Faringdon, Chambers Court)</p>	<p>20mph - Object A 20 mph speed limit should only be applied near schools or where there have been frequent accidents because they cause more pollution and frustration for drivers.</p> <p>50mph - Object As far as I'm aware there is a 50 mph limit for the entire road between Faringdon and Radcot and in fact it extends all the way to Clanfield, so I'm not sure where you mean. This is unnecessary because that road has clear visibility for almost its entire length. The only place a 50 mph limit is justified would be the bends before the Thrupp turn, as you travel away from Faringdon, where there are two farm roads intersecting with the A4095.</p> <p>Travel change: No</p>
<p>(11) Local Resident/Member of public, (Witney, Oxford Hill)</p>	<p>20mph - Object Within the square having the 20mph zone not unreasonable given the shops, communities and buses within the area that was fine but for the rest of Faringdon is completely absurd, disturbing and depressing for the community. It is undemocratic, unethical, divisive and disrespectful for communities of whom can see no need to change the speed limits. Why is that? Because there is no such report advising that the road within the Folly road for example is at 80% risk of death or serious injury if the speed limit is not changed. This consultation if anybody wants to call it that (clearly not) is going to undoubtedly ignore public opinion because the Councillors cannot kick the habit, they bitterly hate anybody that has to do an essential journey in a car.</p> <p>I grew up in Faringdon for two years of my childhood and myself and my Fiancee regular visit Faringdon as we love the community surroundings, its walks, sights such as the Folly and housing. We visit regularly to get away from the</p>

	<p>dystopian 20 mph signs from a neighbouring town that look like Russian Z symbols you see in a Russian street where it made a walk locally at home an utterly bitter and depressing experience knowing that these 20mph signage changes are a political decision and not a road safety decision. I don't take it lightly to compare the Russian Z symbol to a 20mph sign but if the reader googles a Russian city or town what it looks like with the Z symbol in that county it is as comparable as that easily. It is regretful but the honest truth.</p> <p>Devastating to see Faringdon that despite seeing zero road incidents within the town have such a change needlessly taking place that the Police cannot cope with enforcing especially when local Politicians pushing for these changes will undoubtedly carry on going past 20mph as will emergency service personnel</p> <p>Faringdon has great access for cycling and walking safely so does not make sense and urge all residents to write to MPs, maintain pressure on Councillors and the County Council that for as long as those in charge have one rule for themselves it is ok for the rest of us to decide to drive near to 30mph with competent common sense.</p> <p>50mph - Object No change required see previous answer as to why. No need for this because the road surfacing as far more important than the changes proposed to speed limits.</p> <p>Travel change: No</p>
(12) Local Resident/Member of public, (Faringdon, Fernham Road)	<p>20mph - Object It is not necessary given the amount of traffic that passes through Faringdon especially the less used residential streets. 30mph works fine and there majority of drivers adhere to this. When driving it is very difficult to maintain driving at speeds below 20 mph. This is purely a scheme to raise money in fines and penalise car drivers in favour of cyclists etc who do not pay road tax. It is unlikely to reduce accidents. In fact is more likely to cause them.</p> <p>50mph - Support This seems eminently sensible given the road traffic conditions.</p> <p>Travel change: No</p>
(13) Local Resident/Member of	20mph - Object

<p>public, (Faringdon, Spinage Close)</p>	<p>Damn stupid idea. This seems to be part of the OCC plan to get rid of cars. I have lived in Faringdon for almost 20 years and never yet seen any incidence involving a car and pedestrian. I know this is a sham consultation and OCC will do whatever they want as they have done in Oxford and elsewhere. Cars that are speeding will do it anyway whatever the speed limit and there are no police to look after it anyway. If this is an attempt to screw the motorist out of yet more money then as always one can see it as part of the OCC Liberal agenda.</p> <p>50mph - Support The limit there should have been 60 anyway but if we can get the speed limit on a longer stretch that is at least something.</p> <p>Travel change: No</p>
<p>(14) Local Resident/Member of public, (Faringdon)</p>	<p>20mph - Object No need, traffic heavy so speeding isn't possible.</p> <p>50mph - Support Road is safe to drive at this speed</p> <p>Travel change: No</p>
<p>(15) Local Resident/Member of public, (Faringdon, Lower Greensands)</p>	<p>20mph - Concerns Don't think the proposals go far enough. Unsure why some roads will avoid a reduction in speed. What will benefit? Can't see there being much encouragement to walk/cycle when Coxwell & Park Rd remain at 30 (especially when users breach this limit anyway). To encourage people to walk & cycle more then better maintained footpaths and proper cycle routes (not just paint on the road) should be considered and implemented; especially between Gt Coxwell & the Faringdon schools. Also, how will these limits be enforced, will there be average speed cameras, more traffic monitors, or just a few signs up?</p> <p>50mph - Object Makes no sense to extend a faster road limit before reducing it by so much. Not sure of the reasoning behind going faster for longer before having to go even slower.</p>

	<p>Travel change: No</p>
<p>(16) Local Resident/Member of public, (Faringdon, Coleshill Drive)</p>	<p>20mph – Concerns Traffic coming off the A420 from Swindon at the Great Coxwell exit onto Coxwell Street rarely respect the 30mph signs, and 20mph will be similarly ignored without enforcement or traffic calming. Entering the town from this direction is the only direction without any traffic calming, which when considering the new housing, presence of school children and bus stops next to bollards which block half of the road, is a greater priority than a speed sign.</p> <p>50mph - Support Road layout restrict speed</p> <p>Travel change: No</p>
<p>(17) Local Resident/Member of public, (Faringdon, Coxwell Road)</p>	<p>20mph - Concerns I very much support the proposal but would prefer it to extend along the Coxwell Road to include the new housing developments (this is currently proposed as 'buffer zone'). The 30mph is frequently ignored due to the open plan of the road layout (i.e the indirect calming effect of parked cars or road furniture is not present). It's more an acceleration zone from being in the confines of town or a gradual braking zone until cresting the hill. Anecdotally, I have seen a few near misses as people have turned out from faringdon fields estate into the path of cars travelling in excess of the 30mph speed limit. Thinking pragmatically as enforcement is not realistic, changing this to 20mph I would hope that if adherence was still poor, it might mean that vehicles approaching town are at 30 rather than what appears to be in the region of 40+</p> <p>I cycle into town occasionally and walk twice daily for nursery drop off/pickup. I would prefer to make it as safe as possible ahead of my children using the route for school.</p> <p>50mph - Support I've had too many near misses as a cyclist as drivers take a chance. Reducing speed limit brings them closer to my speed and hopefully discourage dangerous overtaking</p> <p>Travel change: Yes - cycle more</p>

<p>(18) Local Resident/Member of public, (Farringdon, Park Road)</p>	<p>20mph - Concerns Supportive of proposal - but very concerned the current retained 30mph buffer on ParkRoad is too long and should be reduced to 100m from junction with A420 to stop before the residential junction with PalmerRd due to the children walking and cycling to schools and town</p> <p>50mph - Support No comment</p> <p>Travel change: Yes – walk/wheel more</p>
<p>(19) Local Resident/Member of public, (Stanford in the Vale, Joyce's Road)</p>	<p>20mph - Support I cycle often in the area and lowering the speed limits increases safety for everyone</p> <p>50mph - Concerns Will drivers slow down in time for the junction if not required to?</p> <p>Travel change: Yes - cycle more</p>
<p>(20) Local Resident/Member of public, (Faringdon, Highworth Road)</p>	<p>20mph - Support 20 is a safe speed for pedestrians in town and makes the town more pedestrian friendly.</p> <p>50mph - No opinion I don't use this road much and didn't know about the proposal</p> <p>Travel change: No</p>
<p>(21) Local Resident/Member of public, (Faringdon, London Street)</p>	<p>20mph - Support I support the speed limit and welcome its introduction. I wish to make comment on the detail of its implementation regarding signage to ensure the attractive historic town is conserved.</p> <p>When the Town Centre 20mph speed limit was introduced last year signage was installed without a great deal of care</p>

	<p>for the appearance or character of the historic area. For example, signs at the entry to the 20mph area on London Street interrupted views of the historic street toward the Market Place and were placed without attention to immediate buildings (i.e. they are not aligned with divisions of buildings or other features to make them less jarring).</p> <p>One benefit, alongside highway opportunities, of the proposed widening of the speed limit area is that the entry/exit signs will be further removed from the historic town centre to areas with more space for careful positioning. We note the Council's Highway Management Policy on Decluttering requires that the existing speed limit entry/exit signs be removed (and hopefully re-used elsewhere to avoid waste) to minimise street clutter. Many signs were mounted on new poles which we trust will also be removed to avoid needless clutter on the footway where repeater signs can be mounted on longstanding lampposts, telegraph poles, etc.</p> <p>We welcome the proposed change and trust it will be implemented in a manner which allows benefits to be realised for the historic environment, fulfilling the Council's duties to conserve heritage assets.</p> <p>50mph - No opinion</p> <p>Travel change: No</p>
<p>(22) Local Resident/Member of public, (Faringdon, Coxwell Street)</p>	<p>20mph - Support Child safety</p> <p>50mph - No opinion Haven't noticed an issue</p> <p>Travel change: No</p>
<p>(23) Local Resident/Member of public, (Faringdon, Bromsgrove)</p>	<p>20mph - Support Restricting traffic speed would make the streets safer and reduce pollution</p> <p>50mph - Support It should make the road safer</p> <p>Travel change: No</p>

<p>(24) Local Resident/Member of public, (Faringdon, Coxwell Road)</p>	<p>20mph - Support Make roads safer for pedestrians and reduce fuel consumption</p> <p>50mph - Support Make it safer</p> <p>Travel change: Yes – walk/wheel more</p>
<p>(25) As part of a group/organisation, (Faringdon, Coxwell Road)</p>	<p>20mph - Support I believe 20mph throughout the town will make it safer for everyone on our roads, especially pedestrians, mobility scooters/wheelchairs, parents with buggies and cyclists. Risk of fatality is significantly reduced with a 20mph vs 30mph limit</p> <p>50mph - Support Over 50mph on a country road like this is excessive speed and more likely to result in accidents</p> <p>Travel change: Yes - cycle more</p>
<p>(26) Local Resident/Member of public, (Faringdon, Leamington Drive)</p>	<p>20mph - Support A step in the right direction towards creating shared spaces/living streets for ALL users</p> <p>50mph - Support 60mph is dangerous along that stretch of road.</p> <p>Travel change: Yes - cycle more</p>
<p>(27) Local Resident/Member of public, (Faringdon, Leamington Drive)</p>	<p>20mph - Support Faringdon town centre has narrow streets and pavements and a lot of parked cars. There are many schoolchildren crossing roads in the centre to get to school and elderly people who need time to cross safely. A 20 mph limit would make a huge difference. As a regular cyclist I would also feel safer if the traffic passed me at a slower speed.</p>

	<p>50mph - Support It is a favourite route for cyclists and being passed at 50mph is a lot less scary than 60. There are a lot of bends and farm entrances along the road.</p> <p>Travel change: Yes - cycle more</p>
<p>(28) Local Cllr, (Faringdon, London Street)</p>	<p>20mph - Support Faringdon is a small market town which is perfectly sized for walking or cycling as the main modes of transport, but the transport system is totally car dominated. A 20 mph speed limit will start to address this and improve safety in local streets which are not suitable for 30mph driving.</p> <p>50mph - Support People just ignore speed limits oif they start too soon.</p> <p>Travel change: Yes - cycle more</p>
<p>(29) Local Resident/Member of public, (Faringdon, London Street)</p>	<p>20mph - Support We have to encourage non car modes of transport, slowing motorised vehicles will do this.</p> <p>50mph - Support Seems sensible</p> <p>Travel change: Yes - cycle more</p>
<p>(30) Local Resident/Member of public, (Faringdon, Westland Road)</p>	<p>20mph - Support I've already seen the benefits of 20mph limit in the Market Place and believe town and residents will benefit enormously with the limit being extended to the wider residential areas.</p> <p>50mph - Support Cars do travel too fast on that particular stretch</p>

	Travel change: Yes - cycle more
(31) Local Resident/Member of public, (Faringdon, Coxwell Road)	<p>20mph - Support Road safety, calmer environment, pedestrian safety, fuel saving by cars, contributing to fighting climate change.</p> <p>50mph - Support Makes sense as part of wider scheme.</p> <p>Travel change: Yes – walk/wheel more</p>
(32) Local Resident/Member of public, (Faringdon, Coxwell Road)	<p>20mph - Support A significant proportion of traffic along Faringdon’s main arteries within the currently designated 30mph zone significantly exceed that limit endangering the lives of pedestrians and cyclists. Not only is a reduced speed limit required over the full extent proposed but speed reduction measures (carriageway narrowing) are needed along the lines of those introduced several years ago in Shrivenham. These are needed on Coxwell Road near to its junction with Coxwell Gardens, on Lechlade Road near to the entrance into the town, and on London Street uphill of Stanford Road.</p> <p>50mph - Support Again much traffic arrives at the town limits travelling above the speed limit.</p> <p>Travel change: Yes - cycle more</p>
(33) Local Resident/Member of public, (Faringdon, London Street)	<p>20mph - Support As a London Street resident I am concerned that 30 mph is too fast given the level of pedestrian, cycle and animal use and the many parked cars and delivery vehicles in the street. In particular there are frequent near misses at the Stanford Road / Church Street junction which is heavily used by people of all ages accessing the popular local amenity of Folly Hill. The proposal to start the 20 mph zone the other side of Sudbury House makes perfect sense and reflects the current good practice of prudent residents familiar with the road.</p> <p>50mph - Support Reflect sensible driving practice.</p>

	Travel change: Yes – walk/wheel more
(34) Local Resident/Member of public, (Watchfield,B4019)	20mph - Support I think the move towards slower speeds is better for communities and the environment 50mph - Support This road can actually be a little dangerous so would help. Travel change: No



Stagecoach West
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January 16th 2023

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

attn. Christian Mauz
Traffic Regulation Team for the
Director for Environment & Place,
Oxfordshire County Council,
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OX1 1ND.

Dear Sirs,

Ref: CM/12.6.207 Proposed Faringdon Speed Limits Order Amendments

1. Background

I am writing with regard to the proposed amended Traffic Regulation Order published on 5th January 2023 and referenced above.

Stagecoach West operates the main bus service in the western Vale of White Horse, being the S6 between the towns of Swindon and Oxford, serving Shrivenham and Watchfield villages en route to the west, and Kingston Bagpuize and Southmoor to the east. The town lies broadly at the mid-point between these two much larger towns just off the main A420 road, where a bypass was completed in the 1980s. Arising from this strategic location has benefited from consistently improving bus services for many decades.

As well as the main S6 service, this also includes the 67, an hourly link to Wantage, operated under contract to the County Council by Thames Travel. Faringdon Community Transport also runs a scheduled local town service numbered 61, that serves a number of side streets and neighbourhood in the main side roads.

Exceptionally, Stagecoach has developed the S6 service from one that in 2001 operated irregularly, to one that in 2019 provided up to 4 buses per hour at peak times, and regular evening and Sunday services to both Swindon and Oxford.

Patronage growth over the last 12 years, COVID notwithstanding, has been among the strongest anywhere Stagecoach operates. There is also unusually strong evidence that significant mode shift was taking place in the corridor, especially at the eastern and western ends of the route.

S6 has been run largely commercially, without public subsidy, for many years until 2021. Most recently significant funding has been applied by the County Council to restore and further enhance the 2019 service level. The County's own revenue support budget for unremunerative but socially necessary services was entirely withdrawn in Summer 2016. To the degree that some services remain funded through the County Council, these are supported by developer funding agreed and required under s106 of the Town and Country Planning Act 1990 (as amended) and the

Community Infrastructure Regulations 2010 (an amended), with a view that those service should become financially self-sustaining in the foreseeable future through passenger fares.

Oxfordshire County Council should therefore already be broadly aware, across all its transport and highways functions, that all the larger settlements in the Western Vale along the A420 are highly dependent on bus to meet mobility needs. Furthermore, any meaningful measures to materially reduce car dependence, congestion and carbon emissions from transport on this important corridor - which has and continues to sustain high rates of population and employment growth - will depend on not only maintaining, but over time maintaining and then further improving the relevance, reliability, efficiency and journey time of the S6 bus service, and indeed others, such as the 67, that the Council has separately sought to improve with exactly that intent.

Any actions that the Council takes that have either an intended or unintended consequences of:

- Making bus journeys slower
- Making bus journeys more unreliable
- Raising the cost of operating bus services
- Making the use of bus materially less attractive in comparison with private car use

should be considered to seriously prejudice the County's wider transport policy objectives clearly set out in the Local Transport and Connectivity Plan (LTCP5).

Stagecoach has considered the proposals set out in the draft Order. These involve, very simply, reducing the speed limit of virtually all roads within in the town currently under a 30 mph limit to 20mph, irrespective of their function and the immediate context along the lengths concerned. The exception is the southern end of Park Road. This proposal therefore directly affects the operation of the S6 bus services in Faringdon. It also has equally significant potential effects on other bus operators and services.

We also need to make reference to the concurrent consultation published on the same day, regarding Shrivenham, through which the S6 also passes, The combined effects of the current proposals in Faringdon, with those in Shrivenham, are significantly greater. We have yet to see proposals published for Kingston Bagpuize-with-Southmoor or Watchfield. A similar approach pursued there would compound the issues and lead to even greater challenges.

2. Stagecoach position of the proposed Order

Stagecoach objects to the proposed Order. In essence, this is because it is unnecessarily extensive, and its safety benefits will not be equally achieved over the extent of the proposed Order. The cumulative effect of so extensive an approach with current proposals in Shrivenham, and potentially in Watchfield and Kingston Bagpuize/Southmoor, will be to extend the scheduled running time sufficiently to use up all the currently scheduled layover time on the route, thus threatening the reliable operation of service S6. Resolving this would require the costs of an additional bus in the cycle at an annual fully allocated cost in excess of £200,000 per annum. This would not be recouped in any way through additional fare revenue.

Indeed extended journey times would tend to erode the attractiveness and use of the service. This, then, materially undermines the financial sustainability of the bus service in Faringdon, and indeed along the whole corridor. It also would serve to create higher levels of car use in the town and along the corridor as a whole, directly jeopardising multiple policy objectives, including increasing the levels of safety for pedestrians and cyclists and pedestrians both in the town and wider corridor.

The intent of the 20mph is, of course to improve the safety and attractiveness of active travel. The Stockholm Declaration principles on which the County's policy is based, applies to:

- Built up areas
- Where there is a degree of “planned mixing” of motorised traffic with more vulnerable users
- Is explicitly to be focused on areas of more intense activity, such as where there are commercial and other service uses, where the safety risks of this mixing are elevated.

Stagecoach well recognises the validity of the logic that lies behind the Declaration. Safety is at the heart of all our operating systems and processes. The bus industry in general represents one of the safest modes of personal mobility of all, reflecting this.

Faringdon is a very long established community that has evolved over centuries, It has a strongly nucleated form, that is accordingly quite compact. Most recently the town has expanded substantially, mainly to the south and to the west, with significant residential developments. All but one of which are accessed off Park Road and Coxwell Road. Park Road has also seen a substantial intensification of commercial development and activity, as well as the replacement of the main primary care facility on a site access off Volunteer Way but very close to park Road. The character of the town, and the built form either side of the main radial through routes, is quite heterogeneous alongside the extensive lengths of the road covered by the current 30 mph limits and proposed for reduction to 20 mph, generally reflecting the way the town has expanded, especially since about 1990. Most of the development since the 1990s has been intentionally designed to stand off the radial roads, and certainly has not involved direct frontage access.

We accept that there are parts of the inner area of the town that are both more densely built up, and where the character of the through roads are such that a lower speed limit of 20mph is justified. We also recognise that Park Road has in effect become the locus of a much higher proportion of commercial activity and public services, of which the Tesco supermarket, and the Medical Centre stand out. A further large-scale out-of-town retail complex is now most recently established at the southern end of Park Road.

The town centre is an attractive and very densely built up built form, well preserving a strongly historic character much of which is pre-Victorian. This area is already covered by a 20 mph limit extending out in all directions at least 100m from Market Place, and further as far as Lechlade Road on the western side. This is a strongly mixed use area with significant commercial activity, albeit the retail and service role of the town centre is less intense than it was. It evolved well before the invention of motorised traffic, and accordingly streets reflect the historic evolution in the context of pedestrians and much smaller numbers of vehicles travelling at walking speeds. There is significant additional pedestrian permeability intersecting vehicular streets that creates a complex pattern of desire lines.

In line with our previous responses in similar consultations, extending the 20mph limit outside the core area night across the entire town presents no in-principle concerns to Stagecoach away from the major streets used as bus routes. Additionally, we recognise that there will be circumstances where the positive safety and environmental benefits of reducing the speed limit to 20mph on bus routes is also justifiable.

Stagecoach has no great concern about residential side roads being subject to a 20 mph limit. Especially in the most recent developments, it is quite hard to exceed such a speed in any case and the limit can evidently be expected to be self-enforcing.

However, the character of the main bus routes In Faringdon, Park Road and Coxwell Road, is generally very different to the historic centre. We note and welcome that the Council is proposing to maintain the limit at 30 mph over about 490m on the southernmost part of Park Road, and over about 280m at the western end of Coxwell Road to act as “buffer zones”. In fact these stretches were until recently, in effect in almost open countryside and the adjacent land has only become urbanised within the last 6 years. As such residential development stands a considerable distance offset, with pedestrian and cycle routes provided in parallel within the developments, as well as new footway along the main road.

However the Order proposes to reduce the speed limit along the entire remaining length of Coxwell Road from the point the historic 30 mph limit applied west of the town near Wearn Road, into the town centre (1100m); and similarly on Park Road (about 850m). When the inclusion of Lechlade Road used on the route around the town centre top and from the mini-roundabout at the Fire Station, this involves an additional 2.1 km of 20 mph limit in each direction through the town.

We **disagree** that the character and use of both roads, and Coxwell Road in particular, justifies this extensiveness of restrictions, or that it would be sufficiently self-enforcing to achieve its intended effects.

We **agree** that the easternmost portion of Coxwell Road, which has extensive frontage development on the back of footways, and quite intense use of the carriageway for car parking, has a character that makes a 20mph limit justifiable. In fact, it is practically quite hard to drive faster than this except late at light. The stretch in question broadly represents that within the Victorian extent of the town, over about 240m from Coxwell Gardens to the Fire Station roundabout. West of this point development is much lower density, albeit with frontage access and multiple driveway crossovers. There is also a significant demand for pedestrians to cross Coxwell Road from residential areas to the north to the Secondary School and Leisure centre to the south, albeit focused very heavily at the junction of Fernham Road. This could be made much safer with investments in an additional controlled pedestrian/cycle crossing west of the Fernham Road junction: one already exists between Highworth Road and Fernham Road. For many pedestrian and cycle journeys towards the town centre, from origins both north and south of Coxwell Road, more direct and quieter parallel routes exists on side streets which are proposed will also be under 20 mph limits.

While it might be debated whether a 20 mph limit would be justified and effective on the stretch between Fernham Road and Coxwell Gardens, further west than this, the justification seems very scant indeed. There is minimal frontage development and most properties back gardens back onto the road, or properties are serviced from parallel service roads or culs de sac. Direct off-street pedestrian and cycle links should by now have been completed from the most recent developments on Coxwell Road and Fernham Road,

On Park Road, there is certainly a greater intensity of conflict between traffic, manoeuvring vehicles and active travel than there is at any point on Coxwell Road. However, this conflict is limited to the northern end of the road. There are several signalised pedestrian crossings. To the east, most business/commercial premises take access from side streets, not the road itself. It is very far from being a "High Street" or even local shopping parade environment.

Not only that, but parallel to and east of Park Road is a dedicated parallel cycling track, running alongside a major footway, that links the southern end of Southampton Street with Volunteer Way. From most of Faringdon east of Park Road this is a more direct and attractive route to destinations on the southern flank of town. From much of the west of the town, again it would make more sense to walk or cycle to work or facilities in the area using side streets and the signalised crossings on Park Road. Indeed, while this is not very obvious on the consultation plan, off-carriageway pedestrian and cycle permeability across Faringdon is very high. This no doubt greatly reduces the relevance and use of either Coxwell Road or Park Road by pedestrians and cyclists.

The context therefore in no way justifies the imposition of a 20mph limit as far as is proposed along Park Road. If there is justification at all, on the grounds of "planned mixing" of large numbers of more vulnerable users along the alignment of the road, this would be most applicable between the Fire Station and the Old Sawmill Road, where a major pedestrian and cycle path crosses the road at a pelican crossing. Whether the width and character of this stretch, with protected right turn lanes and little visual friction, would make a 20 mph credibly self enforcing is in our mind dubious. Thus while more justifiable, its effectiveness would remain a matter of some debate.

We would therefore urge the Council to revisit the proposals on Park Road from first principles. As a minimum, we would expect the 30 mph limit to remain in place as far as Old Sawmill Road being a length of about 750m from the southern end of the existing 30mph restriction.

Stagecoach therefore considers a 20mph limit is appropriate in most of the town including the side streets and limited extension of the zone from the historic core to the west.

On the route through the town used by the S6 strategic inter-urban bus service, we consider a westwards extension of the existing 20mph zone along Marlborough Street and Coxwell Road for about 250m to a point just west of Coxwell Gardens is certainly justifiable. **However, we urge that the existing 30mph limit is retained along the remaining lengths of Coxwell Road, probably beyond the Highworth Road junction and certainly beyond Fernham Road. We would likewise consider that the furthest extent of a 20 mph limit on Park Road should be south of the signalised pedestrian crossing at old Sawmill Road.**

We consider that this reflects an appropriate interpretation of the logic of the Stockholm Declaration and a properly considered and duly balanced application to the context of the town.

This advice reflects that presented to the Council in letters with respect to Orders in Witney of June 29th 2022, and a joint operators' letter to the Corporate Director and Cabinet Portfolio Holder of August 5th 2022.

Finally with regard to **the potential cumulative impacts**, to be specific, if the approach taken to application of 20mph proposed here is carried forward, and equally extensively pursued in Shrivenham, Watchfield, and Kingston Bagpuize with Southmoor, we can advise that the Company certainly would serve notice on the Council and to the Office of the Traffic Commissioner to **re-route service S6, withdrawing the service entirely from High Street Watchfield, and the loop around Faringdon Town Centre**, as this would be operationally infeasible in its current form. Such an approach would mean that there would clearly not be enough time to run the timetable within currently allocated resource.

We are submitting a separate response on the current proposals for Shrivenham.

3. Conclusion

As you and the wider Council are aware, we are of the view that there are substantial risks arising from an indiscriminate "blanket" approach to the application of 20mph limits without detailed consideration of the local context or potential deleterious impacts on public transport.

While we have objected to the submitted Order this has been on the basis of careful and balanced consideration of the specific characteristics of this village, and the experience of decades of bus operation through the village. We respectfully urge the Council to reconsider its proposals on the basis of the evidence we have presented.

As our letter makes clear, we have no objection to the vast majority of the Order proposals through the Parish. However, we consider an approach following the logic and advice above will lead to the appropriate balance being pursued between a number of important transport policy objectives across the County. We therefore urge the Council to pay due regard to the advice set out heretofore.

Yours sincerely

Head of Strategic Development and the Built Environment