Divisions affected: Wheatley

## DELEGATED DECISIONS BY CABINET MEMBER FOR TRANSPORT MANAGEMENT

#### **05 SEPTEMBER 2024**

# TIDDINGTON & MILTON COMMON - 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 Tiddington excepting the current proposal for the A418 which is recommended to remain at 30mph.
- b) To approve the 20mph speed limits at Milton Common.

## **Executive Summary**

- 1. Following formal consultation on proposals for a 20mph speed limit within Tiddington with Albury replacing the majority of the existing 30mph speed limit in the process, whilst retaining the existing 30mph speed limit on the A418 Oxford Road and its adjacent service road which was carried out in September 2023 at the subsequent 'Delegated Decisions by Cabinet Member for Transport Management' meeting in November 2023, the Cabinet Member deferred making a decision on the proposal, with a recommendation to reconsult in order to include a reduction of the speed limits on the A418, and possibly the A40 through Milton Common as well.
- 2. The report therefore presents responses to a statutory consultation on the amended proposals for the introduction of 20mph speed limits in Tiddington and Milton Common, as shown in **Annexes 1** and **2**

## **Financial Implications**

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

## **Legal Implications**

4. 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**

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

## **Sustainability Implications**

6. The proposals would help to encourage walking and cycling within Tiddington and Milton Common by making them safer and more attractive.

### **Formal Consultation**

7. Formal consultation was carried out between 27 June and 19 July 2024. 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, local District Cllrs, Tiddington-with-Albury Parish Council, and the local County Councillor representing the Wheatley division.

## **Statutory Consultee Responses:**

- 8. 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.
- 9. Oxford Bus Company submitted a formal objection (as shown in **Annex 4**), citing whilst the application of a 20mph speed limit throughout the unclassified side roads in the village are perfectly appropriate, the proposals for the A418 presented an entirely different set of circumstances. They considered the proposals to be ineffective in achieving the stated aim, arbitrary, unevidenced and unenforceable. The sole practical outcome that they considered in conjunction with other measures proposed elsewhere on the route, would be to make service No.280 inoperable on its current timetable.

#### Other Responses:

10. A further 61 responses were received via the online survey during the course of the formal consultation, and these are summarised in the table below:

Proposal	Object	Partially support	Support	No opinion/ objection	Total	
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20mph Tiddington	18 (30%)	8 (13%)	33 (54%)	2 (3%)	61
20mph Milton Common	21 (34%)	8 (13%)	21 (34%)	11 (18%)	61

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, the results of which are shown below:

Travel Change	Number
Yes – walk/wheel more	9 (15%)
Yes - cycle more	3 (5%)
Yes – scoot more	1 (2%)
No	48 (79%)
Total	61

12. The responses are shown in **Annex 3**, 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 walking and cycling more attractive and also reduce the County's carbon footprint. This forms part of a countywide programme of works that seeks to deliver 'a safer place with a safer pace'.
- 14. The concerns of Thames Valley Police comprise observations applicable to the overall 20mph project but no site-specific comments relating to the proposals for Tiddington.
- 15. Noting the objection and very strong concerns of the bus operator and the importance of the current bus services operating on this road, and accepting that the character of the A418 with comparatively little direct access from properties and having benefited from the recent provision of a signalled crossing by the bus stops is not as obviously an environment where a 20mph speed limit would be considered appropriate, it is recommended that this element of the scheme is not at present progressed.
- 16. The authority considers objections along the lines of it being unjustified, anticar, a waste of money, not enforceable or pointless to not warrant amendments to a proposal. As such the authority has not addressed any specific comments made of this nature in this report.

## **Paul Fermer Director of Environment and Highways**

Annexes 1 & 2: Consultation plans Annexes

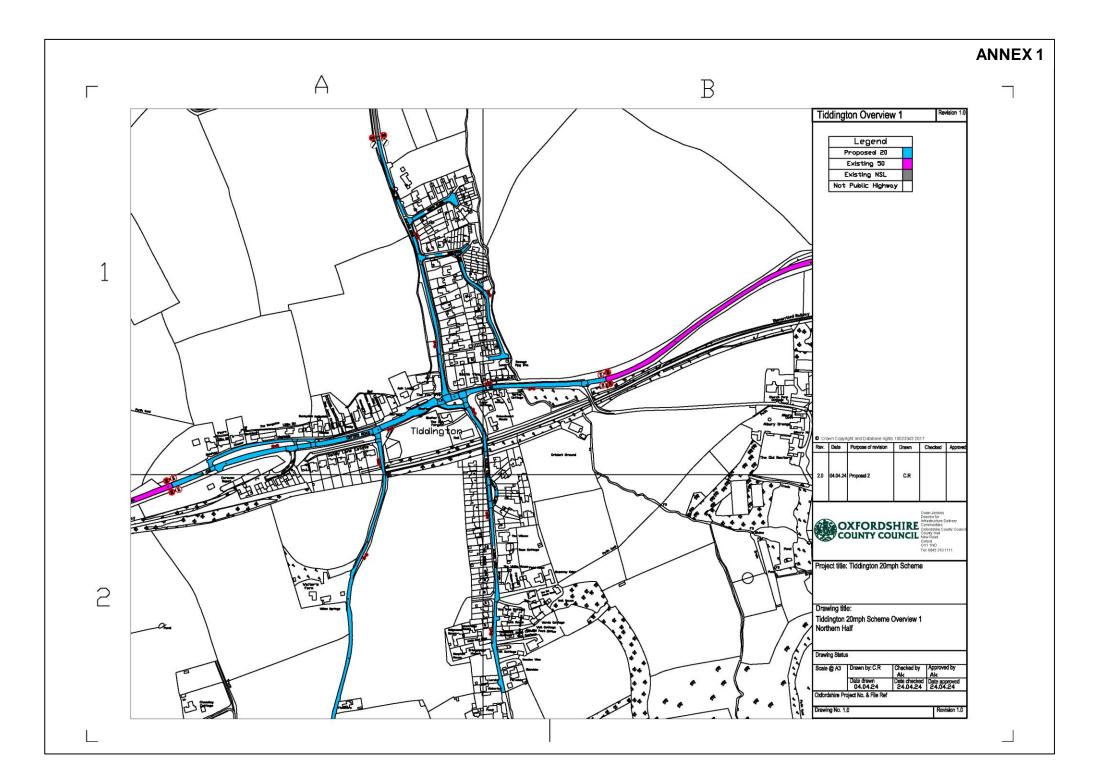
Annex 3: Consultation responses

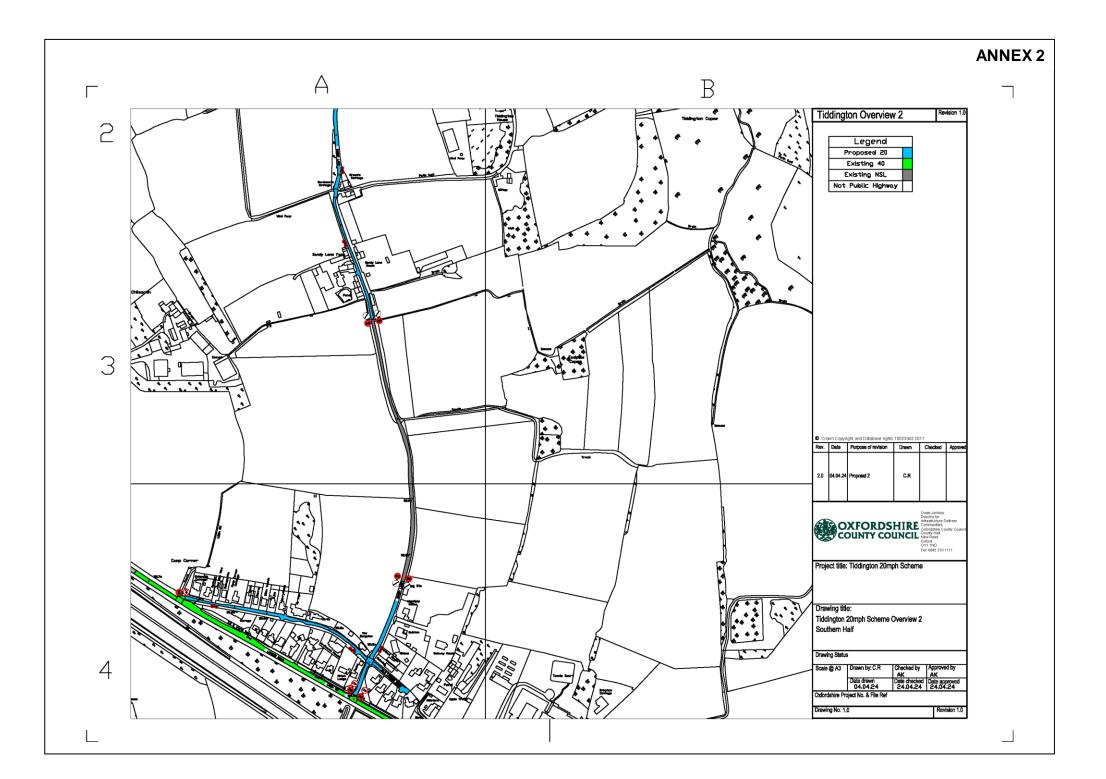
Annex 4: Oxford Bus Company full response

Contact Officers:

Roger Plater (Senior Officer - Vision Zero) Matt Archer (Portfolio Manager – Programme Delivery)

September 2024





RESPONDENT	COMMENTS	
	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.	
	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.	
(1) Traffic Management Officer, (Thames Valley Police)	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.	
	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.	
	The key factors that should be taken into account in any decisions on local speed limits are:	
	<ul> <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> <li>existing traffic speeds</li> <li>road environment</li> </ul>	

	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.  Our stance remains that primarily 20 mph speed limits and zones should be self-enforcing  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
(2) Head of Built Environment and Infrastructure, (Go- Ahead Group)	Object – While the application of a 20mph throughout the unclassified side roads in the village are perfectly appropriate, the A418 presents an entirely different set of circumstances.  We consider the Orders to be ineffective in achieving the stated aim, arbitrary, unevidenced and unenforceable. The sole practical outcome that we consider a reasonable person can envisage, in conjunction with other proposed measures elsewhere on the route, would be to make service 280 inoperable on its current timetable.  [See full response at Annex 4]
(3) Local resident, (Tiddington, Albury View)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>No objection</b> When the A418 lowered from 60 to 50 the amount of dangerous overtaking and frustration from drivers increased. People also already struggle to slow from 50 to 30 so I think lowering to 20 will lead to more accidents where some adhere and others don't. A roundabout at the island would be a more effective traffic calming solution in my opinion.  Travel change: <b>No</b>

(4) Local resident, (lckford)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> This area doesn't require a 20mph Travel change: <b>No</b>
(5) Local resident, (Milton common, Sandy Lane)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> Total waste of time as it's the old A40 with only one side of the road with a few houses you be better off spending money on the pot holes  Travel change: <b>No</b>
(6) Local resident, (Tiddington, Albury View)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> Not enough pedestrians to warrent this change  Travel change: <b>No</b>
(7) Local resident, (Tiddington, Brookside)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> Not needed  Travel change: <b>No</b>

(8) Local resident, (Tiddington, Brookside Close)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> I think this is a money making scheme and there is nothing wrong with 30 mph limit  Travel change: <b>Yes – walk/wheel more</b>
(9) Local resident, (Tiddington, Brookside Close)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> No reason for 20mph. No serious accidents at 30 mph and have the speed camera which makes people slow down Travel change: <b>No</b>
(10) Local resident, (Tiddington, North Close)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> These 20mph zone simply do not work. They create more traffic and in turn increase emissions. Breaking distances have greatly improved over recent years, so why are we still decreasing speed limits? There are many strong reasons why these systems are being reversed in other areas of the world.  Travel change: <b>No</b>
(11) Local resident, (Tiddington, North Close)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> Slowing traffic to 20 would mean a build up of traffic in the village, never allowing cars to get out of the ickford road. 30 allows cars to pass and leave gaps for us to get out in peak times. There is no need for a reduction to 20mph  Travel change: <b>No</b>

(12) Local resident, (Tiddington, Albery View)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> No one speeds through the village, particularly as the Road surface undulates so much with all the pot holes. Very few people are ever visible walking by the road and certainly not enough to merit slowing traffic to 20 mph.  Travel change: <b>No</b>
(13) Local resident, (Tiddington, Albury View)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> I believe that people generally adhere to the 30mph speed limit and there is no need to reduce it further. Cutting down from 50 to 20 through Tiddington will only cause frustration amongst the drivers and that in itself is more likely to cause a problem when they increase their speed rapidly out of the village! The camera in the village is an adequate deterrent and a smiley face type speed control is far more effective. People in general respond and respect 'polite' controls far more than Draconian measures.  Travel change: <b>No</b>
(14) Local resident, (Tiddington, Albury View)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> The 30mph limit is perfectly acceptable for the amount of pedestrians, particularly if enforced correctly. There is also no route for an integrated cycle track, such as an extension to the phoenix trail that could genuinely encourage cyclists, who do not want to share roads with HGVs or cars closely passing them The installation of a 20mph limit will in peak times cause unnecessary congestion due to harsh breaking from the 40/50mph stretches of road immediately either side of the proposal.

	This does nothing to encourage people to use alternative transportation, as Buses will be subject to the same limits and with Arriva leaving the area there will be less service provision.  The implementation of a 20mph limit also goes against current DfT policy  Travel change: <b>No</b>
(15) Rather not say, (Tiddington, Brookside Close)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> I've never seen any speeding and such a short road it doesn't need any wasted public money spending on it Travel change: <b>No</b>
(16) Local resident, (Tiddington, Ickford Road)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> Big roads to be going 20mph, 30 is perfect Travel change: <b>No</b>
(17) Rather not say, (Tiddington, lckford Road)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> Never seen a speeding problem  Travel change: <b>No</b>
(18) Local resident, (Tiddington)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b>

	20mph is a ridiculous speed limit!!!	
	Travel change: No	
(19) Local resident, (Tiddington, North Close)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Object</b> 20mph Is just madness and impossible to do Travel change: <b>No</b>	
(20) Local resident, (Tiddington, lckford Road)	20mph at Tiddington – <b>Object</b> 20mph at Milton Common – <b>Partially support</b> I don't think there's any danger in Tiddington, keeping it at 30 mph  Travel change: <b>No</b>	
(21) Local resident, (Tiddington, Brookside Close)	20mph at Tiddington – Partially support 20mph at Milton Common – No objection  No comments.  Travel change: No	
(22) Local resident, (Tiddington, Albury View)	20mph at Tiddington – Partially support 20mph at Milton Common – Object  Because very few drivers obey reduced speed required by sins  Travel change: No	

(23) Local resident, (Tiddington, Oxford Road)	20mph at Tiddington – Partially support 20mph at Milton Common – Object  We support 20mph on the side roads but object to applying 20mph on the main A418 road as it will make turning out onto the main road from the side roads, and for residents living along Oxford Road, much more difficult, especially at peak times. It's bad enough now with clusters of traffic approaching from both directions, not always in unison, causing long wait times to get out onto the A418. Lowering the speed from 30 mph to 20 mph will cause more traffic to build up from each direction making getting out from the side roads onto the A418 even longer, and much harder especially if joining the road to travel over onto the opposite side.  Living alongside the main road on Oxford Road, the extra noise created from hgv vehicles dropping down in gear/braking to meet 20 mph would also elongate engine noise and chassis noise disruption experienced, as they would have to pass by slower and for longer.  With regards to road safety for pedestrians on the A418, in particular the pavement from sandy lane to Station yard (that runs parallel and close to the main road) we think it would be more sensible to either widen the pavement or to install safety rails along that stretch to protect pedestrians.  There are no main A roads that we're aware of that have 20mph speed restrictions on them.  With regards to Milton Common main road is currently 40mph, a reduction to 20mph is not necessary given low pedestrian footfall.  Travel change: No
(24) Local resident, (Tiddington)	20mph at Tiddington – Partially support 20mph at Milton Common – Object  Unclear where Milton common is exactly, if it's the 40 zone with the hotel that seems far too slow.  Travel change: No

(25) Local resident, (Tiddington, Albury View)	20mph at Tiddington – Partially support 20mph at Milton Common – Object No comments. Travel change: No
(26) Local resident, (Tiddington, Albury View)	20mph at Tiddington – Partially support 20mph at Milton Common – Partially support  My opinion is that very few vehicles take notice of restricted mileage on the signs  Travel change: No
(27) Local resident, (Tiddington, North Close)	20mph at Tiddington – Partially support 20mph at Milton Common – Partially support Support only for side roads, ickford Road sandy Lane reduce speed for Milton Common to 30 Travel change: No
(28) Local resident, (Tiddington, Oxford Road)	20mph at Tiddington – Partially support 20mph at Milton Common – Partially support  I support 20mph on the smaller residential roads with housing close to the road on both sides, e.g Albury view, brookside & North Close.

	However I feel less than 30 mph on a large A road with houses primarily set back from the road is unnecessary & potentially will increase pollution from the excessive breaking to maintain that speed coming down the hills or using a low gear to maintain it on the way out of the village.  I also feel it is unnecessary on roads with houses only on one side of the road as no pedestrians will be crossing who, I assume, are the main target of this safety measure  Travel change: <b>No</b>
(29) Local resident, (Tiddington, Fernhill Close)	20mph at Tiddington – Support 20mph at Milton Common – Object  Tiddington needs to be made safer, the local park backs straight onto the main road, making it a hazard for kids and dogs.  Milton Common doesn't seem to have anything like that immediately next to the road so I think a 20mph change would just make things move slower and get more congested at peak times considering its proximity to the motorway.  Travel change: No
(30) Local resident, (Tiddington, lckford Road)	20mph at Tiddington – Support 20mph at Milton Common – Partially support  Parts of Milton Common should be 20 mph but not the main road through  Travel change: No
(31) Local resident, (Tiddington, Station Yard)	20mph at Tiddington – Support 20mph at Milton Common – Partially support No comments. Travel change: No

(32) Local resident, (Tiddington, Brookside Close)	20mph at Tiddington – Support 20mph at Milton Common – Partially support  There are children and elderly residents living in the village; cars drive far too fast especially down the lckford road.  Travel change: No
(33) Local resident, (Tiddington, Albury View)	20mph at Tiddington – <b>No objection</b> 20mph at Milton Common – <b>Partially support</b> Residential roads need to be monitored, the A418 is good at 30mph. The A40 through Milton common is good at 40mph.  Travel change: <b>No</b>
(34) Member of public, (lckford, Worminghall Road)	20mph at Tiddington – Support 20mph at Milton Common – Support Improve safety Travel change: No
(35) Local resident, (Tiddington, Albury View)	20mph at Tiddington – Support 20mph at Milton Common – Support  Safety reasons- cars fly through the village despite there being a speed camera present. Children, elderly and families live in the village and 20mph would support the demographics  Travel change: Yes - cycle more

(36) Local resident, (Tiddington, Albury View)	20mph at Tiddington – Support 20mph at Milton Common – Support Hopefully it will stop the traffic on the 418 going over 40mph Travel change: No
(37) Local resident, (Tiddington, Fernhill Close)	20mph at Tiddington – Support 20mph at Milton Common – Support A lot of people and animals are around, there is no need to go any quicker Travel change: No
(38) Local resident, (Tiddington, Fernhill Close)	20mph at Tiddington – Support 20mph at Milton Common – Support Safety Travel change: Yes – walk/wheel more
(39) Local resident, (Tiddington, lckford Road)	20mph at Tiddington – Support 20mph at Milton Common – Support  Traffic usage is heavy and fast in a urban areas when children, the elderly and the disabled need to frequently cross or walk along these roads. A reduction in speed limits would make this area much safer and a more pleasant environment for residents  Travel change: Yes – walk/wheel more

(40) Local resident, (Tiddington, lckford Road)	20mph at Tiddington – Support 20mph at Milton Common – Support To bring it in line with Little Milton and protect our grandchildrens safety Travel change: No
(41) Local resident, (Tiddington, lckford Road)	20mph at Tiddington – Support 20mph at Milton Common – Support Too many speeders Travel change: No
(42) Local resident, (Tiddington, lckford Road)	20mph at Tiddington – Support 20mph at Milton Common – Support  People driving like idiots along roads where pedestrians of all ages from babies to elderly, regularly walk. Trying to get out of your driveway without a car, van or lorry taking the front of your car off because they are going way to fast to have any reaction time!  Travel change: Yes - cycle more
(43) Local resident, (Tiddington, lckford Road)	20mph at Tiddington – Support 20mph at Milton Common – Support  The A418 is an extremely busy road and runs through the middle of the village of Tiddington. In addition to the many children who regularly have to cross the road for school or other reasons, people within the village also have reason to access both sides of the A418. Despite the pedestrian crossing, a large number of cars/lorries, vans, etc fail to slow down as they go though the village and the 20mph would provide an additional reminder that this is a residential area and the

	safety of the residents is paramaount. It would also reduce the vibrations and damage caused to those houses close to the A418, some of which are several hundred years old.  Travel change: Yes – walk/wheel more
(44) Local resident, (Tiddington, lckford Road)	20mph at Tiddington – Support 20mph at Milton Common – Support  As a resident of lckford Road I often witness cars speeding well in excess of 30 mph. A 20 mph limit will make pulling out of our drives, crossing the road much safer and for cyclists riding up the road.  I have seen cars and lorries not stop when the crossing lights are red on the A418. I have been tailgated by lorries when I slow down to turn from the A418 into lckford Road.  Travel change: Yes – walk/wheel more
(45) Local resident, (Tiddington, North Close)	20mph at Tiddington – Support 20mph at Milton Common – Support  I am fully supporting the 20mph zones through Tiddington and Milton Common. Tididington is on an A road and people use it as if it's a fast road through our village, they ignore the change of speed limit until the camera but very quickly speed back up. Perhaps cameras are put in place at the top and bottom of the village with the 20mph, see how many get caught. Hopefully the 20mph will slow them down a bit.  Travel change: No
(46) Local resident, (Tiddington, North Close)	20mph at Tiddington – Support 20mph at Milton Common – Support  Many drivers from direction of Draycott absolutely fly down lckford Rd towards the A418 completely ignoring the 30 limit. Probably will ignore the proposed 20 limit too unless speed bumps etc are also in place. But it's a worthwhile proposal anyway. There is no pavement from North Close to the Waterstock Rd making this stretch very dangerous for walkers.

	Travel change: <b>No</b>
(47) Local resident, (Tiddington, Sandy Lane)	20mph at Tiddington – Support 20mph at Milton Common – Support  People continue to drive above the speed limit through Tiddington, despite the Sandy Lane and Ickford junctions, as well as busses stopping to collect school children. The light up signs are frequently out of action. Sandy Lane speed limit should also be reduced as people travel at 30+ despite it being narrow, sometimes overgrown as well as multiple footpaths crossing it.  Travel change: Yes – walk/wheel more
(48) Local resident, (Tiddington, School Lane)	20mph at Tiddington – Support 20mph at Milton Common – Support  Small children play in the village, with narrow, sometimes absent, pathways walking dogs and children are in danger of speeding cars. Also a lot of visitors to the village speed from the main road not realising it's a blind corner and narrow road under the railway bridge which has caused many near misses.  Travel change: Yes – walk/wheel more
(49) Local resident, (Tiddington, Station Yard)	20mph at Tiddington – Support 20mph at Milton Common – Support  We have a lot of elderly and children in the village. Vehicles go at great speed on these roads which is dangerous to everyone but especially elderly and children.  Travel change: No

(50) Local resident, (Tiddington, lckford Road)	20mph at Tiddington – Support 20mph at Milton Common – Support  Living on Ickford Road the traffic speed down this road has got faster and is very dangerous. it has become a rat run for commuters onto the A418 from Ickford and surrounding areas due to the increase in new housing developments.  Travel change: No
(51) Local resident, (Tiddington, Oxford Road)	20mph at Tiddington – Support 20mph at Milton Common – Support  At present most vehicles exceed the 30mph limit, particularly large lorries, causing vibration and noise. If the speed limit was lowered to 20mph it might encourage vehicles to at least reduce their speeds.  Travel change: No
(52) Local resident, (Tiddington, Oxford Road)	20mph at Tiddington – Support 20mph at Milton Common – Support We live on the road, the cars drive so fast on it, and the lorries make our house shake Travel change: No
(53) Local resident, (Tiddington, lckford Road)	20mph at Tiddington – Support 20mph at Milton Common – Support  I am in support as I tried to regulate the use of Sandy Lane to residence or commerce use only, to stop the route being used as a rat run by speeding drivers. We have a close relative who lives on Sandy Lane and prefer to use A418/A40 to visit and proven on numerous occasions hardly longer than using the lane.  Travel change: Yes – walk/wheel more

(54) Local resident, (Tiddington, Albury View)	20mph at Tiddington – <b>Support</b> 20mph at Milton Common – <b>No objection</b> Tiddington is residential with very many children and it makes sense to drive carefully and thoughtfully. Evidence of anyone being booked for doing 40 in the current 30 limit would be most welcome.  Travel change: <b>No</b>
(55) Local resident, (Tiddington, Albury View)	20mph at Tiddington – <b>Support</b> 20mph at Milton Common – <b>No objection</b> More children live in Tiddington now and 30mph in a narrow lane or coldersack is to fast also with the cricket club playing fields it can get very busy  Travel change: <b>No</b>
(56) Local resident, (Tiddington, Brookside Close)	20mph at Tiddington – <b>Support</b> 20mph at Milton Common – <b>No objection</b> I live in Tiddington. The vehicles all drive way too fast. They are a danger to pedestrians and animals  Travel change: <b>No</b>
(57) Local resident, (Tiddington, lckford Road)	20mph at Tiddington – <b>Support</b> 20mph at Milton Common – <b>No objection</b> Anyway of slowing traffic on the village roads is a bonus for safety reasons

	Travel change: No
(58) Local resident, (Tiddington, Sandy Lane)	20mph at Tiddington – <b>Support</b> 20mph at Milton Common – <b>No objection</b> As a resident of Sandy Lane i wholeheartedly support a 20mph speed limit from the Tiddington end all the way past Sandy Lane Farm. The road is one car's width and bendy yet people race down it at dangerous speeds to and from the motorway as a short cut. I have lived here 12 years and have had several near misses. I cannot believe it is not already a 20mph zone.  Travel change: <b>Yes - cycle more</b>
(59) Local resident, (Tiddington Oxford, Oxford Road)	20mph at Tiddington – <b>Support</b> 20mph at Milton Common – <b>No objection</b> I live on the Oxford Road and my house shakes sometimes when lorries drive through so fast  Travel change: <b>No</b>
(60) Local resident, (Tiddington, Albury View)	20mph at Tiddington – Support 20mph at Milton Common – No objection  I live in Tiddington so will be affected by any changes.  Travel change: No
(61) Local resident, (Tiddington, Fernhill Close)	20mph at Tiddington – <b>Support</b> 20mph at Milton Common – <b>No objection</b> May make it easier to join 418 from lckford road and albury view

	Travel change: Yes – scoot more
(62) Local resident, (Tiddington, Sandy Lane)	20mph at Tiddington – Support 20mph at Milton Common – No objection  Sandy Lane it would be so much better  Travel change: No
(63) Local resident, (Tiddington, lckford Road)	20mph at Tiddington – <b>No objection</b> 20mph at Milton Common – <b>Support</b> I live on lckford Rod and walk my dog early mornings and I have to rush to get to the fields to avoid the speeding cars also when pulling out of our drive which we reverse in to is a problem with cars flying around the corners.  Travel change: <b>Yes – walk/wheel more</b>



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10th July 2024

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

Christian Mauz
Senior Officer (TRO and Schemes) Network Management
Directorate of Environment & Place
Oxfordshire County Council
County Hall
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Dear Mr Mauz.

## STATUTORY CONSULTATION – Ref: CM/12.6.385/P0084 - Tiddington proposed 20mph Speed Limits

I refer to the proposed Traffic Regulation Order changes referenced above. City of Oxford Motor Services Limited (Oxford Bus Company) 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 find ourselves regrettably **formally objecting** to the proposed Order. The basis for this objection is set out below.

#### 1. Background

The village of Tiddington evidently lies astride the A418, being the classified main road between Oxford, the A40/M40 and the large and rapidly growing town of Aylesbury, in Buckinghamshire. While of no policy concern to the Council, Aylesbury is a designated "New Garden Town" and as such in practical terms the route therefore represents a key movement corridor between Science Vale and this area of major plan-led expansion. Within the County, the road is the principal route to Thame, linking it to the wider local and national highways network.

It has consequentially always been a significant public transport corridor. Over the last 40 years, and most notably over the last 10 years prior to the COVID-19 public heath crisis, the level of service on this corridor had been gradually boosted. To some extent

this has been an intentional response to significant development that has taken place in Thame.

The corridor has seen significant evolution, and a degree of instability, in recent years, aggravated by the effects of the Government's response to COVID-19. The most recent development has been the decision of the main and long-standing incumbent operator first to renumber and substantially amend the service pattern, then reduce the frequency, and finally, with effect from 27<sup>th</sup> July 2024, entirely to close its Aylesbury-based operation, and therefore withdraw operation of its service.

In anticipation of this, Oxford Bus Company has elected to proactively register to operate the service between Oxford and Thame, under its long-standing former number of 280, and this commenced operation on 1<sup>st</sup> July 2024, running every 30 minutes.

A further service X20, currently running competitively with the previous operator will remain in place running an additional 2 buses/hour between Oxford, Thame and onwards to Haddenham and Aylesbury. It is important to observe that this service does not follow our 280 route but rather bypasses Wheatley, using the A40.

We are aware that the current proposal is not the first in the Parish. At the time of the prior consultation, we were not operating services through the village. We are not aware that either of the operators at the time raised any concerns. However, to the extent that we understand that it was anticipated that the A418 through the village would remain at 30mph, we would have raised no objection.

We are therefore again surprised and disappointed to be faced with this proposal when, following previous concerns raised about the indiscriminate and arbitrary nature of a wide variety of similar schemes, across the County, that, quite apart from the direct impact on bus operations, also are clearly outwith the expectations set out in DfT Local Transport Note LTN 01/2013 that was revised and reissued in April 2024. This clear guidance sets out a number of clear principles that are considered to represent an appropriate balance, based on a range of evidence, on the application of 20mph "signonly" speed limits, to allow the duty binding on the Council under Section 16 (1) of the Traffic Management Act 2004 to be properly discharged. Failure to have due regard to these principles, in our reckoning, places the Council in breach of these duties in law and thus subject to legal challenge.

This guidance makes plan that 20mph limits are ineffective where average traffic speeds on average exceed 24mph prior to implementation, as is the case here. It makes even clearer that the safety benefits of signed 20mph limits only subsist when the limit is self-enforcing. The nature, purpose and character of the road concerned has a very large bearing on this, and classified routes that perform a major movement function are explicitly considered to be those where an arbitrary imposition of signed limits is both likely to be ineffective as well as inappropriate.

We have been making similar points consistently for a considerable amount of time, prior to the re-issuance of the LTN.

Furthermore, following consistent concerns we had raised on the cumulative impacts of 20mph limits on bus operations, 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.

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.

To date, notwithstanding many very welcome stated goals to improve public transport, this Council administration has barely 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.

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

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

#### The proposals

The proposals involve the substitution of the existing 30mph with a 20mph limit in its entirety through the village, including the A418 Oxford Road through the village, along which the 280 bus service runs, serving a single pair of bus stops. The existing 30mph limit covers 700m length of highway starting a significant distance beyond the built-up frontage, especially east of the village.

The nature and purpose of the A418, as a historic trunk road and a current part of the National Primary Network, is well reflected in its character. The road is consistently at

least 7.3m wide, reflected in the central portion of carriageway being hatched out on almost its whole length through the village. The road through the village was historically improved with clear evidence that it was straightened as well as widened in the past, reflecting prevailing design standards for trunk roads. Consequently, forward visibility is good, and looks to have reflected a much higher historic speed limit, possibly as high as 50 mph. The bus stops are supplied with laybys in both directions to dimensions broadly reflecting the Design Manual for Roads and Bridges applicable to major classified roads. The only departure from these standards is the lack of protected right-turn "ghost" islands for traffic turning into the main side roads.

The village is loosely cruciform, with the bulk of properties lying north and south on the two arms formed by Ickford Road and Albury View. To the extent that a single plot depth of ribbon development has historically emerged, mainly westwards, it benefits from no direct carriageway access. Reflecting this, dwellings and properties are set back from the kerbline. There are no street trees or other features creating "visual friction" to assist in self-regulation of speeds to the current limit of 30mph, much less one of 20

Nor is there much if any clear demand to cross the road, away from the existing pelican crossing at the main junction in the village, that has been installed in recent years immediately west of the main junction at the Fox and Goat public house, and also directly serving the bus stops. This has involved substantial truncation of the eastern tapers to the laybys, which is not helpful. All the public services in the village lie within 100m of this crossing. There is no education provision in the village. As such, there is no evidence that there is any significant degree of planned mixing or interaction of vulnerable road users with through traffic in the village, along the line of the A418.

Along the line of the 280 corridor, these proposals will have effects that are cumulative with extensive 20mph provision in Thame – including proposed blanket extension of already very-extensive existing 20mph limits, and in Wheatley. Within the City of Oxford, bus journey speeds have collapsed as a result of unprecedented levels of congestion induced by the introduction of Low Traffic Neighbourhoods in East Oxford, and this directly affects services to and from Thame and Tiddington, through the significant increase in congestion seen in the St Clements area.

#### 2. Justification for the proposals

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

We dispute, from first principles, that significant levels of interaction take place between vulnerable road users and pedestrians on the A418, as we set out above away from the existing signalised crossing, which lies directly on the main north-south pedestrian desire line. Pedestrians and cyclists can use parallel provision off the carriageway,

especially to the north of the A418, west of the crossing leaving only a handful of properties at Station Yard that do not so benefit. A similar number on the Thame Road to the east do not benefit from some kind of separate cycling provision, but footways exist on both sides of the road and could be widened.

We equally dispute that the sudden drop in speed limit from 50mph either side of the village, to 20mph will serve to reduce median speeds to much less than 30mph at any point in the village along the A418. For this to happen, drivers would need to start to decelerate about 700m in advance of the limit. There is nothing that suggests that drivers will volunteer to do this, especially in the absence of any proposed advanced signage. The proposals would be effective in real-world terms, only in slowing down buses, with no demonstrable positive effect on road safety.

#### 3. The position of Oxford Bus Company

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

While the application of a 20mph throughout the unclassified side roads in the village are perfectly appropriate, the A418 presents an entirely different set of circumstances.

We consider the Orders to be ineffective in achieving the stated aim, arbitrary, unevidenced and unenforceable. The sole practical outcome that we consider a reasonable person can envisage, in conjunction with other proposed measures elsewhere on the route, would be to make service 280 inoperable on its current timetable.

As such the only way to maintain the current timetable, would be to otherwise speed the service up by omitting diversions to certain villages, such as Wheatley; or to remove certain lesser-used stops on the service. In fact, the existing stops in the village will benefit from 4 buses per hour, an exceptionally high level of supply relative to the population, and one rational measure we will consider, should these proposals be implemented, would be to run our 280 service without stopping in the village, to try and preserve bus journey times for the vastly higher numbers of service users travelling between Thame and points to the west.

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