

Divisions affected: Otmoor

CABINET MEMBER FOR HIGHWAY MANAGEMENT – 17 NOVEMBER 2022

AMBROSDEN: PROPOSED 20MPH SPEED LIMITS

Report by Corporate Director, Environment and Place

RECOMMENDATION

1. The Cabinet Member for Highway Management is **RECOMMENDED** to approve the proposed introduction of 20mph speed limits as advertised.

Executive summary

2. The report presents responses to a statutory consultation on the proposed introduction of 20mph speed limits in Ambrosden as shown in **Annex 1**.

Financial Implications

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

Equality and Inclusion Implications

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

Sustainability Implications

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

Consultation

6. Formal consultation was carried out between 29 September and 28 October 2022. A notice was published in the Bicester Advertiser 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, Cherwell District

Council, the local District Cllrs, Ambrosden & Blackthorn parish councils, and the local County Councillors representing the Otmoor and the Ploughley divisions.

Statutory Consultee Responses:

7. Thames Valley Police responded by re-iterating their views concerning OCC's policy and practice regarding 20mph speed limits and again wish their response to be considered as 'having concerns' rather than an outright objection.
8. Stagecoach Bus Company objected on the grounds that they viewed the proposals to be unnecessarily extensive, and its safety benefits will not be equally achieved over the extent of the proposed Order, while the cumulative effect of so extensive an approach will be to threaten the reliable operation, and ultimately the financial sustainability of the bus services in the village, and to the neighbouring village of Arccott and Bullingdon prison in particular. The full response can be found in **Annex 3**.

Other Responses:

9. Two responses were received from members of the public, both living in Oxford; one supportive, and one raised a generic objection that officers consider irrelevant to this consultation (see para 12).
10. The responses are shown in **Annex 2**, and copies of the original responses are available for inspection by County Councillors.

Response to objections and other comments

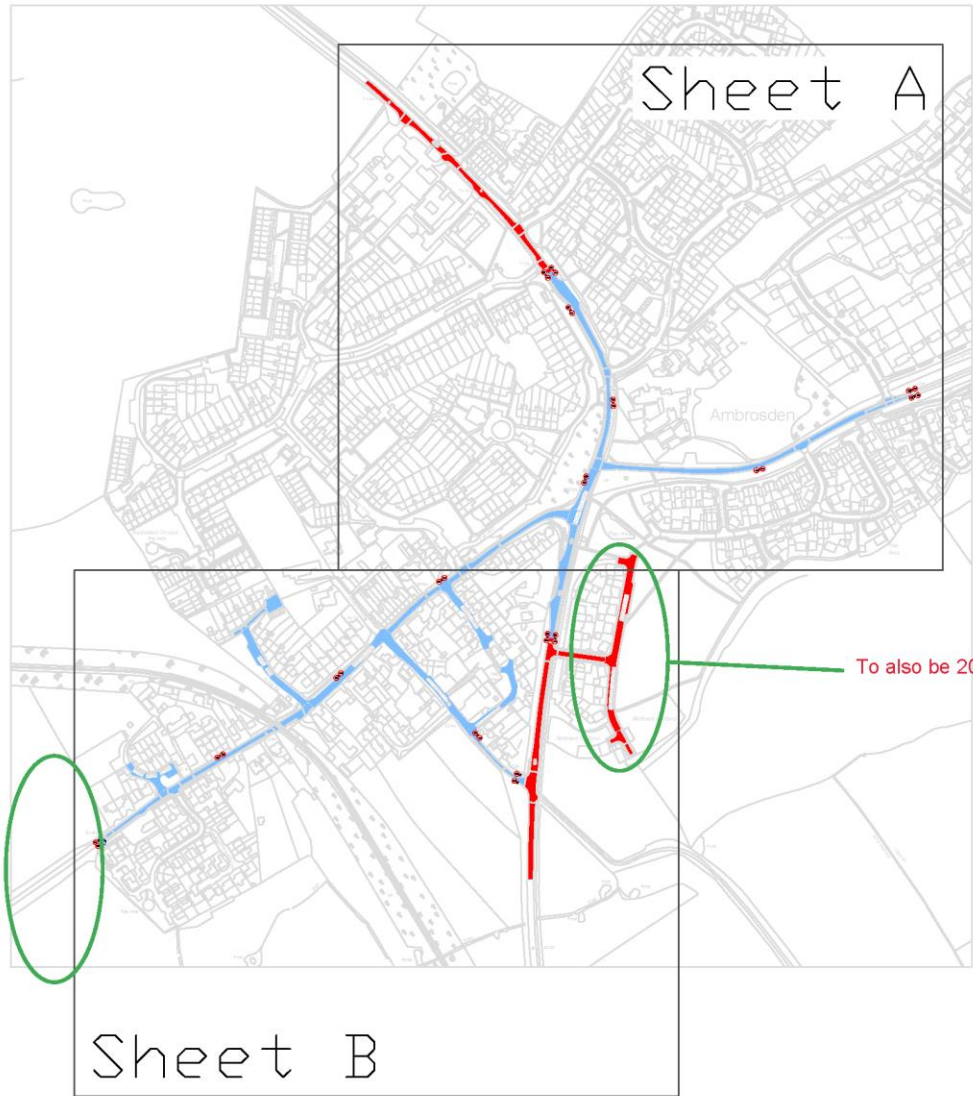
11. The main purpose of the scheme is to encourage greater use of active travel by reducing speeds; this will also reduce accidents. The aim of reducing speed limits is to change driver's mindsets to make speeding socially unacceptable and make more environmentally friendly modes of travel such as walking and cycling more attractive – and also reduce the Counties carbon footprint. This forms part of a countywide programme of works that seeks to deliver 'a safer place with a safer pace'.
12. Officers will monitor and work with the bus companies to ensure that there is no negative impact on the services that they have mentioned within their objection.
13. The authority considers objections along the lines of it being unjustified, anti-car, a waste of money, not enforceable or pointless to not warrant amendments to a proposal. As such the authority has not addressed any specific comments made of this nature in this report.

Bill Cotton
Corporate Director, Environment and Place

Annexes Annex 1: Consultation Plan
 Annex 2: Consultation responses
 Annex 3: Stagecoach full response

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November 2022



Drawing No.		Revision			
Notes:					
[Blue Box]		Proposed new 20mph			
[Red Box]		Existing 30mph limit			
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Rev.	Date	Purpose of revision	Drawn	Checked	Approved
<p>Bill Collan Director of Communities Operations Oxfordshire County Council County Hall New Road Oxford OX1 1ND Tel: 0845 310 1111</p>					
Project title					
Ambrosden 20mph Limit					
Drawing title					
General Layout					
Drawing Status					
Scale @ A3	Drawn by ER	Checked by	Approved by		
	Date drawn	Date checked	Date approved		
Oxfordshire Project No. & File Ref					
Drawing No.		Revision			

RESPONDENT	COMMENTS
(1) Traffic Management Officer, (Thames Valley Police)	<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 • 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) Stagecoach Bus Company, (Head of Strategic Development & the Built Environment)	Object – [See Annex 3 for full response]
(3) Member of public, (Oxford, Banbury Road)	<p>Object – 20mph is extremely slow and this change has not been adequately justified, nor can it be since the road is perfectly safe and adequate to support traffic at the current speeds. Again this is an unnecessary change proposed by an unfit council which is fundamentally anti-car.</p> <p>Travel change: No</p>
(4) Member of public, (Oxford, Richards Lane)	<p>Support – I would like to see Oxfordshire become a car free; and bike and pedestrian friendly city.</p> <p>Travel change: Yes - cycle more</p>



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September 30th 2022

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

Dear Sirs,

Ref: CM/12.6.105 Proposed Ambrosden Speed Limits Order Amendments

1. Background

I am writing with regard to the proposed amended Traffic Regulation Order published on 29th September 2022 and referenced above.

Stagecoach West operates the vast majority of bus services in Cherwell District, including to from and within the towns of Banbury and Bicester, and the diverse substantial communities closer to the City of Oxford. Our network serves Ambrosden Village and has done for several decades. The settlement has a very distinct character and function reflecting its enlargement to serve the large military facilities in the locality.

Ambrosden lies between the much larger town of Bicester, to which it has historically looked for services, on a route that has long been used as a direct route towards the eastern side of Oxford. In particular, this area hosts important travel destinations around Headington including the John Radcliffe Hospitals. In the late 1980s and 1990s the introduction of minibuses allowed bus frequencies to rise and over time Ambrosden became an integral part of the wider Bicester route group, served as a terminal extension to the 55. ~~More~~ recently and in partnership with Oxfordshire county Council, we have extended the Bicester-Ambrosden service south of the village via Merton and Islip direct to Headington providing an entirely new facility to all communities on the line of route. This H5 service runs hourly alongside a new local service 29, that together provide a combined half-hourly service between Ambrosden and Bicester.

This level of service exceeds anything that the village has enjoyed in the past, to our knowledge. This to a reflects not only the growth of the village but much more so, the much larger strategic development at Graven Hill.

These services have been run largely commercially, without public subsidy, for many decades. The County's own revenue support budget for unremunerative but socially necessary services was entirely withdrawn in Summer 2016. In the case of Ambrosden services H5 and 29, these are partly funded through the County Council, with 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 policy recognises that Cherwell District is highly dependent on bus to meet mobility needs and that, furthermore, any meaningful measures to materially reduce car dependence, congestion and carbon emissions from transport, will depend on not only maintaining, but over time greatly improving the relevance, reliability, efficiency and journey time of bus services across the District. 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.

Stagecoach has considered the proposals set out in the draft Order. These involve, very simply, reducing the speed limit of virtually all the roads within in the village currently under a 30 mph limit to 20mph, irrespective of their function and the immediate context along the lengths concerned. This proposal therefore directly affects the operation of bus services 29 and H5 to and through Ambrosden.

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, while the cumulative effect of so extensive an approach will be to threaten the reliable operation, and ultimately the financial sustainability of the bus services in the village, and to the neighbouring village of Arncott and Bullingdon prison in particular.

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.

The historic village of Ambrosden is a very long established small community that had evolved slowly over centuries. The period after 1945 saw very rapid development of extensive areas of military housing, all set within extensive areas of open space a very good distance from the public highway. Much of this housing is designed on "Radburn" urban design principles, which intentionally segregates motor vehicles from walking and cycling routes even within the wider built form. Most recently, the village has continued to expand mostly to the east, by several incremental expansions, that have been designed on "landscape led" principles on the village margins. This has seen existing hedgerows alongside the highway generally retained and parallel walking and cycling routes provided behind them physically segregating these routes from passing through traffic. The character of the majority of the village is therefore exceptionally heterogeneous alongside the extensive lengths of the road covered by the current 30 mph limits and proposed for reduction to 20 mph. Most of the village has been intentionally designed to minimise and actively discourage the "planned mixing" of vulnerable road users with motorised traffic, especially on the main Ploughley Road and Blackthorn Roads, which represent three of the four through routes through the village. In fact

there is a high level of planned segregation. This is a quite unusual situation. In addition by virtue of their width, character and alignment, there are few if any features that would support or otherwise encourage the self-enforcement of a speed limit of less than 30 mph along these routes.

We accept that there are parts of the historic village core that are both more intensively built up, and where the character of the through roads are such that a lower speed limit of 20mph is justified. These oldest parts of the village evidently lie west of the junction with Ploughley Road along the Merton Road.

There are some side streets and this is where service and facilities including the Post Office, Turners Arms and some other businesses are found. Parts of the road are narrower with built frontage directly adjoining, and the footway is discontinuous over part of the length. Walking and cycling routes from recent and ongoing development west of the village to the primary school must use this stretch. This is an area where “planned mixing” of traffic with vulnerable users is evident. There is significant on-street parking and the character of the road already tends to reduce safe speeds below 30 mph. Thus, a 20mph limit will be credibly self-enforcing on this length.

Services 29 and H5 uses Ploughley Road, and Merton Road.

it is essential that the application of such limits is targeted to those stretches of road where its positive benefits are most appropriately achieved, in all the settlement concerned, including this one, to avoid the service becoming inoperable without adding expensive additional operating resource. Slowing buses down also hardly encourages greater use. It is also directly contrary to national and local policy.

Stagecoach considers a 20mph limit is appropriate in most of the village especially in residential side roads, which in the most recent developments are designed and built to this end in any case.

We also recognise that the principles of the Stockholm Declaration are reasonably applicable to the include the village core along Merton Road to the junction with Ploughley Road. The presence of the Primary school east of Ploughley Road might also justify the extension of the 20mph limit through the main junction up to the pedestrian crossing serving the school, and a very short distance east on Blackthorn Road.

We urge that the existing 30mph limit is retained along the remaining lengths of Ploughley Road, and Blackthorn Road, the latter because we can see a case to divert bus service along Blackthorn Road in the future dependent on how demands evolve in the area. We consider that this reflects an appropriate interpretation of the logic of the Stockholm Declaration and its application to the context of the village.

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 more specific, **if the approach taken to application of 20mph proposed here is equally extensively pursued in Merton, Islip, and Barton Village,** we can advise that the Company would be likely to serve notice on the Council to cease operating service H5, as this would be operationally infeasible in its current form. **Service 29 would no longer have time to extend to Arncott and Bullingdon Village.** There would clearly not be enough time to run the timetable within currently allocated resource.

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 consideration and the experience of decades of bus operation through the village.

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

Nick Small

Head of Strategic Development and the Built Environment

