

Divisions affected: *Thame & Chinnor*

DELEGATED DECISIONS BY CABINET MEMBER FOR TRANSPORT MANAGEMENT

05 SEPTEMBER 2024

THAME – PROPOSED 20MPH SPEED LIMITS

Report by Director of Environment and Highways

RECOMMENDATION

The Cabinet Member is **RECOMMENDED** to:

Approve the introduction of the amended 20mph speed limits in Thame as advertised excepting for the following roads:

- a) B4445 Aylesbury Road – terminal point to be 60 metres north of its roundabout junction with Bell Lane & the B4445 North Street,**
- b) B4445 Chinnor Road – terminal point to be 25 metres southeast of its junction with Cotmore Gardens,**
- c) Kingsey Road - terminal point to be 40 metres east of its junction with Kings Road,**
- d) Oxford Road - terminal point to be 15 metres southwest of its junction with Fish Ponds Lane.**

Executive Summary

1. The report presents responses to a statutory consultation on revised proposals for the introduction of 20mph speed limits in Thame, as shown in **Annex 1**.
2. The revised proposals follow a previous consultation exercise carried out between 26 October and 17 November 2023, and the subsequent decision by the Cabinet Member for Transport Management to: a) approve the introduction of 20mph speed limits in Thame, and b) a reassessment by Officers of the proposed speed limits on Oxford Road, Kingsey Road, Youens Drive, and Thame Park Road.
3. Officers have subsequently reconsidered speed limits on those roads previously omitted from the proposed 20mph speed limit, particularly those adjacent to nearby schools, and also on the B4445 Aylesbury Road and B4445 Chinnor Road. It should be noted that currently none of the proposals as approved at the decisions meeting on 14 December 2023 have been implemented.

Financial Implications

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

Legal Implications

5. 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

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

Sustainability Implications

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

Formal Consultation

8. Formal consultation was carried out between 4 and 26 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, the local District Cllrs, Thame town council, and the local County Councillors representing the Thame & Chinnor division.

Statutory Consultee Responses:

9. Thames Valley Police re-iterated views concerning OCC's policy and practice regarding 20mph speed limits which they consider as 'concerns' rather than an objection, adding that they felt an expansion of the previously proposed limit would potentially lead to even more poor compliance.
10. Oxford Bus Company submitted a formal objection, stating that they considered the proposals to be unjustified & arbitrary, which would serve to make public

bus services slower and less attractive, while in practice having no credibly demonstrable safety impact. The response is shown in full at **Annex 3**.

11. Thame Town Council offered their support for the proposals, emphasising their desire for Station Yard & Thame Park Road to be included within the area covered by the lower limit.

Other Responses:

9. 62 responses were received via the online survey during the course of the formal consultation, comprising of: 25 objections (40%), nine partially supporting (15%), 25 in support (40%), and three non-objections (5%).
10. 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	7 (11%)
Yes - cycle more	10 (16%)
No	39 (63%)
Other	6 (10%)
Total	62

11. Additionally, a further seven emails were received directly, with five objecting, and two partially supporting.
12. The responses are shown in **Annex 2**, and copies of the original responses are available for inspection by County Councillors.

Officer Response to Objections/Concerns

13. The main purpose of the scheme is to improve road safety and to encourage greater use of active travel by reducing speeds; this will also reduce collisions. 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 objection of Oxford Bus Company is noted and it is acknowledged that the revised proposals affect bus routes and it is also acknowledged that other proposed speed limit changes in adjacent villages as part of the 20mph speed limit project will also lead to some increases in journey times on the same bus services.

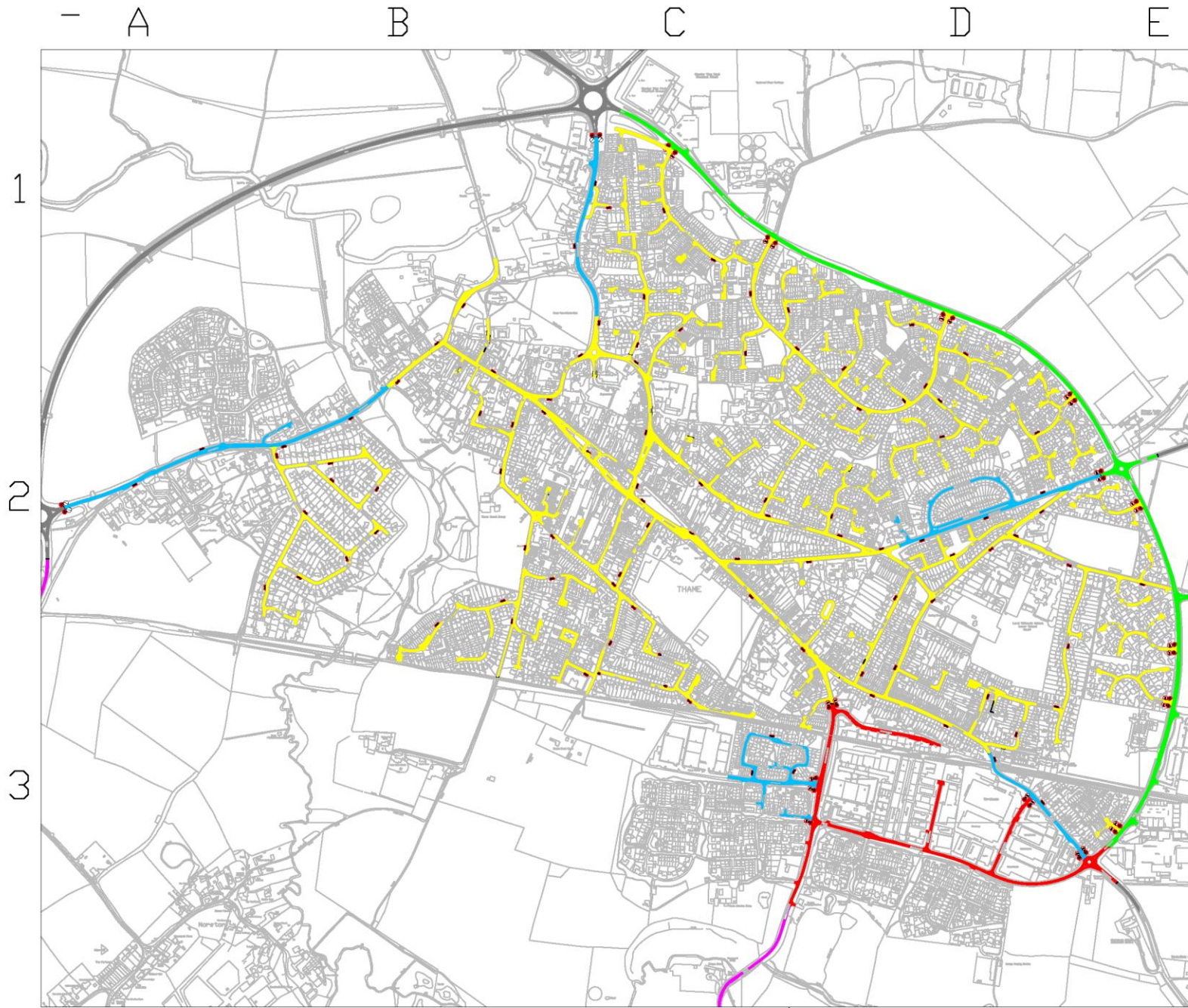
15. Balancing the objectives of the 20mph project with other key objectives including supporting the use of bus travel can – as here – be challenging. Having carried out a further review of the proposed extensions under the current proposals of the 20mph speed limits at B4445 Aylesbury Road, B4445 Chinnor Road, Kingsey Road and Oxford Road, officers recommend that these should not be progressed at present, taking account of the specific road environments and usage and the consultation responses.
16. 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.

Paul Fermer
Director of Environment and Highways

Annexes
 Annex 1: Consultation plan
 Annex 2: Consultation responses
 Annex 3: Oxford Bus Company full response

Contact Officers: Anthony Kirkwood (Team Leader - Vision Zero)
 Matt Archer (Portfolio Manager – Central Programme)

September 2024



Thame 20mph Overview Revision 1.0

Legend	
Proposed 20	█
Approved 20	█
Existing 30	█
Existing 40	█
Existing 50	█
Existing NSL	█
Not Public Highway	█

© Crown Copyright and Database rights 10023343 2017

Rev.	Date	Purpose of revision	Drawn	Checked	Approved
3	23.02.24	Proposal 3 - Extended	C.R.		

OXFORDSHIRE COUNTY COUNCIL

 Owen Jenkins
 Director for
 Infrastructure Delivery
 Communities
 Oxfordshire County Council
 County Hall
 New Road
 Oxford
 OX1 1ND
 Tel: 0845 310 1111

Project title: Thame 20mph Scheme

Drawing title:
Thame 20mph Scheme Overview

Drawing Status

Scale @ A3	Drawn by: C.W, C.R.	Checked by: G.J.B.	Approved by: G.J.B.
	Date drawn: 23.02.24	Date checked: 23.02.24	Date approved: 23.02.24

Oxfordshire Project No. & File Ref

Drawing No. 1.0	Revision 3.0
-----------------	--------------

RESPONDENT	COMMENTS
(1) Traffic Management Officer, (Thames Valley Police)	<p>Concerns – Expanding this limit is likely to lead to even more poor compliance of the 20 limit, Our concerns remain from previous consultation dated 7th November 2023 [<i>as included below</i>]</p> <p>Thames Valley Police welcome the opportunity to engage on plans for road safety improvement and acknowledge that 20mph limits can be a useful tool in road safety. There are other reasons 20mph limits may be desirable for communities, such as environmental concerns, and creating a shared space environment to encourage greater diversity of road users.</p> <p>Compliance with 20mph limits is a challenging issue as there is a difference between the achievable results of the various available schemes. For example a sign-only scheme will only have a limited effect on the mean speeds, as opposed to other schemes that influence the road environment, which is recognised as being key to achieving compliance. If a speed limit is set too low and is ignored then this could result in the vulnerable road user being less safe. It can also cause a dis-proportionate number of drivers to criminalise themselves and could bring the system of speed limits into disrepute.</p> <p>Thames Valley Police have no policy to enforce based on arbitrary speed limits alone but will enforce based on threat of harm, risk and resourcing. 20mph limits are not excluded from this and will be enforced where appropriate. There should be no expectation that the police would be able to provide regular enforcement if a speed limit is set too low as this could result in an unreasonable additional demand on police resources and there are no additional resources available to support extra enforcement. Messages from partners that police will not enforce need to be discouraged. Such messaging can encourage non-compliance and should be avoided.</p> <p>The policy of Thames Valley Police is to use sound practical and realistic criteria (Setting local speed limits - GOV.UK (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

	<ul style="list-style-type: none"> • 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) Managing Director, (Oxford Bus Company)	<p>Object – Again, we would urge the Council’s officers to engage positively with us at the earliest reasonable opportunity.</p> <p><i>[See full response at Annex 3]</i></p>
(3) Thame Town Council	<p>Support – Thame Town Council resolved at its meeting yesterday:</p> <p>“To support the proposed amended 20mph speed limits for Thame, and request that Station Yard / Thame Park Road be included within the 20mph zone.”</p>
(4) Local resident, (Chinnor)	<p>Object – A pointless exercise, not policed, just another drain on our money we pay the council.</p> <p>Travel change: No</p>

<p>() Local resident, (Long Crendon, Frogmore Lane)</p>	<p>Object – Not convinced of environmental benefits. Roads proposed are not accident hotspots. Pointless unwanted exercise</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Hampden Avenue)</p>	<p>Object – I find any reduction from 30mph to 20mph in Thame, considering that the current arrangement works well for driving, walking and cycling. On the contrary, reduction to 20mph will increase congestion for local residents, which will adversely impact everyone at the end.</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Bannister)</p>	<p>Object – With today's modern cars they are safer and there is no need for a 20mph limit. As usual it is done for financial reasons</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Blackthorn Grange)</p>	<p>Object – 20mph limits are unnecessary. They do little for personal safety and are counter productive in terms of pollution.</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Chiltern Grove)</p>	<p>Object – Seems unnecessary spend when potholes need to be filled in and and roads and pavements need to be weeded. Also another way of charging people for 'speeding'</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Chinnor Road)</p>	<p>Object – More important things this money should be spent on. Whether that be on the roads or elsewhere.</p>

	Travel change: No
() Local resident, (Thame, Churchill Crescent)	<p>Object – I believe a reduction to the speed limits from 30mph to 20 mph will further add to pollution due to lower gearage being used which results in higher revving vehicles. Additionally, there will be an increase with tailgating traffic which will allow for more dangerous driving as opposed to a safer driving environment.</p> <p>Travel change: No</p>
() Local resident, (Thame, Croft Road)	<p>Object – Driving at 20 mph increases engine rpm and air pollution. 30mph has been safe for years. the millions of pounds spent could have been put to better use. HOW MANY PEOPLE HAVE BEEN KILLED OR INJURED DUE TO THE 30MPH</p> <p>Travel change: No</p>
() Local resident, (Thame, Cromwell)	<p>Object – 8,500 cars pass through Thame daily with an average time spent on the affected roads being 4 minutes, or 5m20s with 20mph limits. This means a collective 184 hours of time increase everyday. This will reduce the productivity of the local population. Local businesses will suffer with slower response times, cyclists are more exposed to cars taking twice as long to pass them and increased depth perception errors from drivers. These are not subjective arguments. Subjectively, people will do 30-40mph anyway and you'll get more 20mph-ers being overtaken by 30mph-ers, which is dangerous. You're better off enforcing more 30mph limits via cameras, even if you must leave them off being too expensive for poor thame.</p> <p>Travel change: Other Drive more</p>
() Local resident, (Thame, Digby Close)	Object – Ground for objections.

	<p>1. The restrictions are counterproductive as drivers will have to pay too much attention to the speed as it's proven to be extremely difficult to maintain the lower speed.</p> <p>2. The cost of change is out of all proportion to any benefits. There is already a budget deficit, and this unnecessary cost is unacceptable.</p> <p>3. Speed restrictions are already in plan on many of these roads.</p>
() Local resident, (Thame, Digby Close)	<p>Object – There are far more important things to be spending time and money on.</p> <p>Travel change: No</p>
() Local resident, (Thame, East Street)	<p>Object – Bad idea. Drivers will too busy checking their speed rather than at the road.</p> <p>Travel change: No</p>
() Local resident, (Thame, Glenham Road)	<p>Object – 20mph is too slow. With modern cars ability to stop quicker, limits should be revised upwards not downwards. In practice, the current state of the roads in Thame prevent speeding and pot holes cause more concerns of safety with drivers having to look immediately in front of them rather than looking ahead for potential hazards such as pedestrians</p> <p>Travel change: No</p>
() Local resident, (Thame, Hampden Avenue)	<p>Object – Currently with the 30MPH limit, as far as I'm aware, there have not been any accidents in Thame. Changing the limit to 20MPH will only cause aggravation and carelessness by some drivers.</p> <p>Travel change: No</p>
() Local resident, (Thame, Hawthorn Avenue)	<p>Object – The Oxford Road is a wide straight road with good vision all along it. It also has a cycle lane whereas most of the other roads do not. Therefore it does not need to be 20 mph.</p>

	Travel change: No
() Local resident, (Thame, Henry Blyth Gardens)	<p>Object – While I appreciate the council's intention to enhance road safety, I believe these proposals are misguided and ineffective for several reasons.</p> <p>Firstly, empirical evidence on the effectiveness of widespread 20mph speed limits is mixed at best. Numerous studies have shown that lowering speed limits to 20mph does not necessarily lead to a significant reduction in actual driving speeds, particularly on roads where the natural driving speed is higher due to road design and traffic conditions. For example, a study by the Department for Transport (DfT) in 2018 found that the impact on actual speeds was limited and that many drivers did not adhere to the new limits, especially in the absence of physical traffic calming measures.</p> <p>Furthermore, the resources allocated to implementing these speed limit changes could be better spent on addressing more pressing issues, such as the poor condition of our roads. The state of road surfaces in Thame has deteriorated significantly, leading to increased wear and tear on vehicles and potential safety hazards for drivers, cyclists, and pedestrians alike. Investing in road maintenance and repairs would yield more tangible benefits for the community, ensuring safer and smoother travel for all road users.</p> <p>While I understand the need for lower speed limits in certain areas, I believe the proposed blanket approach is excessive. The main thoroughfare, specifically the stretch from Cross Keys to the roundabout between High Street, Southern Road, and Bell Lane, is the only area where a 20mph limit may be justified due to higher pedestrian activity and the presence of shops and schools. Extending 20mph limits to other areas, such as Oxford Road, Kingsey Road, Youens Drive, and Thame Park Road, seems unnecessary and likely to cause frustration among drivers without delivering substantial safety benefits.</p> <p>In conclusion, I urge the council to reconsider the proposed 20mph speed limits and instead focus on targeted measures where they are genuinely needed. The money and effort would be better directed towards repairing and maintaining our road infrastructure, which would have a more immediate and positive impact on road safety and the overall driving experience in Thame.</p>
() Local resident, (Thame, Henry Blyth Gardens)	<p>Object – Don't see the need to reduce the speed limit</p> <p>Travel change: No</p>

() Local resident, (Thame, Henry Blyth Gardens)	<p>Object – 20mph speed limits have not been proven to provide any societal benefit. Technology in cars is getting better and safer, with automatic pedestrian recognition and braking systems, although the roads have got busier they should be safer than they have ever been.</p> <p>Slowing cars down, will only increase impatience in drivers and reduce their attention - you are much more likely to introduce accidents.</p> <p>I would suggest that a better solution would be to increase pedestrian areas in Thame and in fact reduce the areas cars can go. Having a high street that is open for stalls, cafes etc and pedestrians to move freely would be far nicer than cars moving slightly slower everywhere.</p> <p>Travel change: No</p>
() Local resident, (Thame, Lashlake Road)	<p>Object – There are no clear reasons for the reduced speed limits. The case for hitting a pedestrian at 30 vs 20 is misleading as in most cases the driver has slowed down from 30 before an accident. Encouraging more cyclists on the road will only increase danger as cycling is the most dangerous form of transport on British roads. New Zealand have also conducted research showing lower limits increases pollution and that the FTL report was not peer reviewed and highly politicised. Please provide any meaningful reasons for the 20mph limits.</p> <p>Travel change: No</p>
() Local resident, (Thame, Marstonj Road)	<p>Object – I object to the change of speed on the. B4445 Aylesbury Road – a point 59 metres south of its roundabout junction with the A418, B4011 & A4129. There is no justification for this whatsoever and has no doubt been put forward by a Thame Town councillor because that is what he thinks it should be. No one will stick to such a ridiculous speed limit. But we already know that it will be "Recommended for Approval" by the unelected civil servants that dream up these ideas and then automatically passed by Andrew Gant. So it's not democracy but a case of we can so we will.</p> <p>Travel change: No</p>

<p>() Local resident, (Thame, Naseby Close)</p>	<p>Object – Completely unnecessary as enough restrictions are already being imposed on Thame residence by a Council who operates a political agenda rather than considering the real concerns for achieving a balanced approach to use of roads by motorised vehicles, bicycles and people. At least two of the proposed additional restrictiuons are already controlled by speed cameras and from my observations ensure an effective control of speed on these stretches of road. They are relatively "open" roads with residences set back from the pavements and so clear vision of pedestrians on pavements is available. It is unnecessary to waste time and money on further restrictions.</p> <p>Travel change: Other I can't cycle or walk into Thame at the moment following recent hospital operations which continue and restrict my mobiolity for some time to come. The more restrictions you impose, the more I am housebound.</p>
<p>() Local resident, (Thame, Saxon Square)</p>	<p>Object – In my opinion these changes are being forced on the majority by a a very small minority of residents and councilors. Whilst I have no objection for the implementation of a short 20mph area around schools and on some housing estates, it is not required on areas of main road - such as the Oxford Road for example.</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Glenham Road)</p>	<p>Object – The implementation of a 20mph speed limit will be a significant hindrance on drivers, particularly in areas such as Oxford road and Kingsey Road where there are very few pedestrians These roads should remain 30mph but with better enforcement activity</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Glenham Road)</p>	<p>Object – 30 is fine</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Hamilton Road)</p>	<p>Object – Objecting - the statistics for collisions within the existing 30mph limits in Thame do not support the necessity for this scheme. The majority of collisions within Thame take place on 40mph limit zone or the National speed limit</p>

	<p>areas. This scheme to bring the speed limit down to 20 on certain roads is unnecessary, and merely following a trend imposed by SOC across the county with little statistical basis. By all means use the 20mph limits in appropriate places - outside schools. But blanket 20 limits are largely ignored (and currently unenforceable) because the public seem them for what they are - pointless!</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Tythrope Way)</p>	<p>Object – 30mph are never policed and the Thame Boy Racer brigade knows this so who will police the new 20mph. Modern car engines are not built to travel at 20mph, perhaps we should suggest a use a man walking in front of the car with a flag to manage speed. Cycling would not increase due to the appalling state of the roads and the impatience of drivers trying to overtake at 20 mph.</p> <p>Travel change: No</p>
<p>() Email response, (unknown)</p>	<p>Object – Does anybody ever learn? Maybe have a look why the welsh backtracked on this? It is a complete and utter nonsense, waste of resources and simply virtue signalling from people who have nothing constructive to add to the town.</p> <p>Most drivers travel at around 20mph anyway and those that don't wont, regardless. But no doubt you have made your minds up anyway....depressing</p>
<p>() Email response, (unknown)</p>	<p>Object – I never object to a 20 mph near schools for the safety of our children.</p> <p>I have looked at the email below whereby the majority of the roads in Thame will now be reduced to 20 mph.</p> <p>The new proposals to extend other areas within Thame to 20 mph will also be approved automatically and therefore there is no point in lodging any appeals.</p> <p>I believe that this whole consultation is a waste of time and more importantly money. The money being wasted could have been spent on the roads and pavements in Thame which need to be repaired including all the weeds in the town centre. Thame was a beautiful market town and look at it now.</p>

<p>() Email response, (unknown)</p>	<p>Object – I object to this speed limit being put in place on the grounds of more emissions into the atmosphere. The slower a vehicle goes, the more emissions are put out from the exhaust. The only places that 20mph should be are outside schools and outside old folks homes. I doubt if my comments will bear any weight because i believe that if the council has decided to enforce this, it will go ahead no matter what anyone says to the contrary.</p>
<p>() Local resident, (Thame, Chinnor Road)</p>	<p>Partially support – I am writing to formally object to the exclusion of Chinnor Road from the proposed 20mph speed limit zones in Thame. I strongly believe that Chinnor Road should be included in the new 20mph scheme, at least up to the bridge where it meets Garden City.</p> <p>Vehicles frequently exceed the 30mph speed limit on Chinnor Road, which has already led to numerous incidents causing damage to the cars parked along the road. Without a reduction in the speed limit, I fear a more serious incident or injury is inevitable.</p> <p>My primary concern is the safety of local residents and pedestrians. Chinnor Road is a main route for young children walking to John Hampden Primary School, and the speed of the cars and the lack of a marked crossing point make it hazardous to cross. Additionally, it is a popular route for cyclists, elderly residents and young mothers with prams walking into town. I constantly worry when reversing out of my driveway every morning that my car might be hit by a speeding vehicle while my baby is in the back seat.</p> <p>Introducing a 20mph speed limit on Chinnor Road would greatly enhance the safety of the residents and pedestrians, particularly the most vulnerable. I strongly urge the Council to include Chinnor Road in the new 20mph zone.</p>
<p>() Local resident, (Tetsworth, Swan Gardens)</p>	<p>Partially support – If you make it too odious to enter Thame town centre, more business from the surrounding villages will go to companies like Amazon and large supermarkets that do not have a presence in the town. You will also create more vehicle fumes by ICE vehicle having to use higher revs for the same distance.</p> <p>Travel change: No</p>
<p>() Rather not say, (Thame, Buttermarket)</p>	<p>Partially support – Residential streets adjacent to through roads make sense, but arterial roads need to flow.</p>

	<p>Travel change: Other Pollute more (not by choice) put air quality meters in to measure NOx emissions due to people travelling in 3rd gear</p>
<p>() Local resident, (Thame, Chowns Close)</p>	<p>Partially support – There have not been any accidents so we do not need 20 mph limits. More speed limit changes make it harder for drivers to make sure they are doing the correct speed.</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Esingdon Drive)</p>	<p>Partially support – The junction of Wenman Road and Thame Park Road is the scene of vehicles repeatedly skidding off the road. With increased house construction off Wenman Road it is also a route taken by many children to and from school. I urge that all the approaches to that junction be included in the 20 MPH limit.</p> <p>Travel change: Yes – walk/wheel more</p>
<p>() Local resident, (Thame, Ludsdan Grove)</p>	<p>Partially support – 20 limit already in Ludsdan Grove, no one takes any notice of it !! Some days its also like Piccadilly Circus with the school use which originally was not going to be Ludsdan Grove. !!</p> <p>Travel change: Other Live local always walk unless going out of town or collecting or delivering family</p>
<p>() Local resident, (Thame, Nelson Street)</p>	<p>Partially support – The issue is that there is no way to impose the 20th rule so it will be ignored . If you want to implement 20mph roads then you need to put in place calming measures otherwise it's a pointless waste of time and money.</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Overton Drive)</p>	<p>Partially support – 'I am a 16-year-old student studying at Lord Williams Upper School and I have often been a key bridge between the councils and authorities, and the young voice of Thame and the surrounding area. I often consult with my peers about issues that come up, including this one.</p>

My main priorities sit with the road of Oxford Road, and as that road sits adjacent to the LWS school, it is my priority to ensure that the road is safe for people traveling to the school. For those currently walking to the school along the Oxford Road, there are no adequate crossings along the road in suitable locations, so at present (and I would imagine for quite a while longer in the future) the students often take their lives in their hands as they sprint across the main road, dodging cars and buses and lorries traveling at speed towards them. While the issue of crossings persists, the speed the cars move at is a way we can stop a child from being hit by a car (I would imagine that wouldn't look too good in the press). Lowering the speed to 20mph along the section of road next to LWS would be an excellent method of making roads safer while crossings are (hopefully) built in the next few years.

In addition, I would prefer it that any student who currently cycles to school along Oxford Road doesn't have a heart attack from the amount of cars that currently speed down the road, next to a poorly made cycle path that doesn't actually protect cyclists (argument for another time). If we were to have slower speeds then surely it would naturally encourage more timid cyclists to cycle around. Isn't that what you want?

During peak hours, the road is busy with parents dropping off and picking up their children, along with buses taking many students to college. The high traffic volume, coupled with the current 30mph speed limit, creates a hazardous environment. A 20mph speed limit would significantly decrease the likelihood of accidents, giving drivers more time to react to pedestrians and reducing the severity of any potential collisions. Plus, at those peak times it's uncommon for traffic to move much faster than that anyway.

The other roads that concern this proposal sit in different categories for me. (Note: These are now my personal opinions not the collective opinion of students)

Kinsey Road has a crossing point that is HEAVILY used by Lower School students, as well as those traveling to the tennis or bowls club, or to the phoenix trail etc. This is currently heavily treacherous for people crossing the road. Reducing this road to 20mph would be welcomed, however, placing crossing points on this road and keeping speeds at 30mph would be welcomed equally as much. My compromise to people would be to place crossing points on the road, and then keep the speed at 20mph until the large unlit crossing at Churchill Crescent before then opening up the speed to 30mph before the roundabout, as there are no houses along the road, and with it being a wide road, it is clearly a road that 20mph would be violated anyway. Plus, the nice old crossing lady is presumably getting near retirement, so when she decides to retire, replacing it with a traffic light would be a nice fitting change.

I understand that some roads in the proposal are essential for maintaining efficient traffic flow in and out of Thame. Roads that serve as main arteries for commuters and commercial traffic should ideally remain at 30mph to prevent congestion. Reducing these roads to 20mph could lead to longer travel times and increased frustration for drivers,

	<p>which may have a negative impact on the town's overall traffic management. It is also important to consider that some vehicles, such as larger commercial trucks, may find it challenging to consistently travel at such a low speed without causing delays and potential safety issues. Some streets arguably fit this description for me:</p> <ul style="list-style-type: none"> -Chinnor Road -Aylesbury Road <p>While they do have homes on these roads, not extreme amounts and there are often crossing provisions on these roads, but I would like to see more. Perhaps extending the 20mph zone along Aylesbury Road along a bit, but I do get that you have to please everyone.</p> <p>And finally, the Thame Park Road and Youens Drive changes. They're fine. Keep them.</p> <p>So overall, it is essential that we keep the 20mph zone around LWS school, but in an effort to keep everyone happy, including the motorists, I suggest perhaps keeping some of these roads as 30mph, or using some of the suggested compromises above.</p> <p>Travel change: Yes - cycle more</p>
<p>() Local resident, (Thame, Warren Mead Wenman Road)</p>	<p>Partially support – I think it essential that prior to implementing such measures an accurate assessment of traffic, numbers of vehicles, current speeds etc is undertaken.</p> <p>There has been no through assessment by OCC of traffic, volume of traffic, nature of vehicles as OCC have acknowledged below.</p> <p>Our response We can confirm that no traffic surveys have been specifically undertaken in respect of the speed limit proposals for Thame including Wenman Road, Thame. For your information, the reference to 'Officers having taken the current road environment & traffic usage into account' referred to a more general assessment of the flows and function of these roads. A further consultation on proposals for Thame is being carried out. Please find attached a copy of the consultation.</p> <p>Travel change: No</p>

<p>() Local resident, (Towersey, Chinnor Road)</p>	<p>Partially support – I still believe Wenman Road and Station Yard should be included. People on the new estate all have to cross this road to go anywhere. Please remove the Cyclists Dismount signs.</p> <p>Travel change: Yes – walk/wheel more</p>
<p>() Local resident, (Thame)</p>	<p>Partially support – For the two roads that we use most, Oxford Road and Aylesbury Road we fully endorse the proposals. This will provide greater safety for Lord Williams's school and users of the sports centre where speeding vehicles on the Oxford road are a danger to entry into and exit from the site. Aylesbury Road similarly has access to offices and residential streets with pedestrians crossing.</p> <p>Others are better placed to comment on other roads but for safety, consistency and environmentally it is desirable all roads are at 20mph.</p>
<p>() As part of a group/organisation, (Coalition for Healthy Streets and Active Travel)</p>	<p>Support – I am responding on behalf of CoHSAT, 20mph speed limits are now proven to make roads safer, with evidence from several UK cities and widescale implementation in Wales showing casualty reductions of 20-30%.</p> <p>We support of of these extensions to the 20mph zone for Thame.</p> <ul style="list-style-type: none"> • Oxford Road, should be 20mph to Lord William’s Upper School to enable safe cycling to the school on a road with only painted advisory cycle lanes. The distance from the school to the High Street is only 700 metres, and buses have two stops within that, so this would not cause significant delay to bus services. This small additional distance will not affect bus timings as buses will be slowing and stopping, and there will be a significant safety benefit for people crossing the road between the north bus stop and the nursery, leisure centre and school. (We note the lack of a crossing). • Aylesbury Road. There is significant danger at the bend (around Priest End) and a child was killed around here some years ago. This is a relatively short distance and should not impact bus services greatly. • Churchill Crescent. Is a purely residential crescent and an obvious choice for a 20mph area. • In addition, the part of Kingsey Road south of Churchill Crescent, contains residential frontages, and is an important route to school for many children, we also support this being 20mph.

	<p>There is no crossing of the busy Kingsey Road here, although it is a key route to school and there are Zebra crossings of Queens Road and Towersey Road. We request that a crossing (zebra or signalled) is noted as a near future intervention for Kingsey Road, close to the bus stops at the east end of Churchill Crescent and footpath between Kingsey Road and Seven Acres.</p> <ul style="list-style-type: none"> • Jane Morbey Road, Massey Road and roads off them are low traffic, residential neighbourhood closes. They are natural for reduced speeds for resident safety. • Chinnor Road / Garden City is a residential road with a difficult bridge, all insider the ring road. Reducing the speed here is consistent with keeping residents safe, and a '20 where the people are' plan. <p>Travel change: Yes - cycle more</p>
<p>() Member of public, (Haddenham, Rudds Lane)</p>	<p>Support – I regularly cycle into Thame from Haddenham, and whilst the original plan would have made a very welcome improvement, maintaining the 30 mph limit along Oxford Road did not make sense. The 20 mph limit should help reduce close passing along that stretch and make for a more appealing ride into town for visitors from outside. My daughter formerly attended Lord Williams's Lower School and now attends the Upper School, so I'm also pleased to see that all the roads around both schools will be 20 mph, particularly in light of a recent incident in which a pupil was knocked off his bike on the main road outside the Upper School at pick-up time.</p> <p>Travel change: Other May make a marginal difference, but I am a committed cyclists anyway. However, it is certain to improve the quality of those journeys, and would influence what I was happy for family members to do.</p>
<p>() Local resident, (Long Crendon, Westfield Road)</p>	<p>Support – I regularly cycle through Thame but the traffic, and specifically the speed of vehicles makes me feel unsafe. Slower speeds with more time to be able to safely react around cyclists will make cycling feel a lot safer</p> <p>Travel change: Yes - cycle more</p>
<p>() Local resident, (Thame, Chinnor Road)</p>	<p>Support – I live on Chinnor Road and cars drive down there way too fast given the conditions. I was looking at seeing how we instigate speed humps but the 20 would do the trick almost as well!</p>

	Travel change: No
() Local resident, (Thame, Chinnor Road)	<p>Support – I live on Chinnor Rd where lots of kids walk along every day and the speed cars and trucks go at is often dangerously fast.</p> <p>Travel change: No</p>
() Local resident, (Thame, Chinnor Road)	<p>Support – I think it will increase road safety. HOWEVER I would ask that there are sufficient repeater signs particularly on the proposed roads entering Thame from the Oxford and Chinnor ends of the town to remind us of the speed limit</p> <p>Travel change: No</p>
() Local resident, (Thame, Chinnor Road)	<p>Support – The speed limit of 30 is too high for the smae roads in Thame which have cars parking on one or both sides. a high percentage of drivers travel too fast and would be unable to stop if a person or animal stepped out from a parked car. If this speed limit is lowered it needs to be monitored by speed cameras.</p> <p>Travel change: No</p>
() Local resident, (Thame, Chinnor Road)	<p>Support – I fully support the proposals especially the extension to surrounding roads. It's not good enough to wait until serious consequences happen before anything is done. People drive around Thame like they're invincible and without any thought or care for other people; children; the vulnerable; the elderly and pets.</p> <p>Travel change: Other</p> <p>I always try to walk more anyway but hopefully this will encourage others</p>

<p>() Local resident, (Thame, Chinnor Road)</p>	<p>Support – This is a good idea as far too many go over the existing speed limit. Chinnor Road sounds like a race track during the evenings. My personal view would be all roads inside the thame by-pass should be 20 mph</p> <p>Travel change: Yes – walk/wheel more</p>
<p>() Local resident, (Thame, Church Road)</p>	<p>Support – Motorists tend to drive too quickly through the town centre making it difficult for pedestrians to cross the road at some junctions (eg the top of Bell Lane).</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Churchill Crescent)</p>	<p>Support – I feel that the 20 mile per hour speed limits will enhance safety and make a better environment for all people in Thame. I am pleased to see the addition of the 20mph limit to Churchill Crescent and the other areas indicated.</p> <p>Travel change: Yes - cycle more</p>
<p>() Local resident, (Thame, Garden City)</p>	<p>Support – Living in Garden City, Thame, the proposal to extend the 20mph speed to include this. or so we understand, is welcome as long as it is enforced. The current 30mph limit is ignored by many drivers and they drive at speeds exceeding this, in some cases far exceeding it.</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Hampden Avenue)</p>	<p>Support – For the vast majority of roads in Thame these proposals will have minimal impact. This is because you can either not drive at more than 20mph already or it would unsafe to do so. I 100% support these proposals.</p> <p>Travel change: Yes – walk/wheel more</p>

<p>() Local resident, (Thame, Hazel Avenue)</p>	<p>Support – The 20mph limit is an excellent proposal and will make Thame a safer and quieter place, especially regarding the fact that it is becoming busier with more residents and visitors. However, to make the speed limit work better, it should be widened to cover the main access roads in and out of Thame and be enforced with speed cameras or other appropriate measures. Also, parking restrictions could be more strongly applied.</p> <p>Travel change: Yes – walk/wheel more</p>
<p>() Local resident, (Thame, Ludlow Drive)</p>	<p>Support – How many drivers obey the present speed limit? Should save lives.</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Maple Road)</p>	<p>Support – The proposals improve pedestrian and cyclist safety within Thame and encourage traffic to use the ring road rather than through the town centre, where there is a focus on increasing pedestrian access</p> <p>Travel change: Yes – walk/wheel more</p>
<p>() Local resident, (Thame, Queens Road)</p>	<p>Support – I would like to see all road within the area of Thame 20mph</p> <p>Travel change: Yes - cycle more</p>
<p>() Local resident, (Thame, Roman Way)</p>	<p>Support – I'm pleased that the 20mph has been extended to Oxford Rd. This road suffers badly with Speeding and it seems that the majority of those drivers are aware that the speed camera is not turned on. Although this change may not stop these people, it might slow them a little which I think is important where children cross for the Upper School and to use the Leisure Centre. Also noted there have been a few cyclists knocked off by the turning with Roman Way, so the lower speed is something I support.</p> <p>Travel change: No</p>

<p>() Local resident, (Thame, Seven Acres)</p>	<p>Support – I am fully in support of the 20 mph limit extending up Oxford Rd and Kingsey Rd for the safety of children walking to school and cyclists.</p> <p>Travel change: Yes - cycle more</p>
<p>() Local resident, (Thame, Seven Acres)</p>	<p>Support – Reduction in traffic noise, pollution levels and improved road safety for cyclists and pedestrians.</p> <p>Travel change: Yes - cycle more</p>
<p>() Local resident, (Thame, Victoria Mead)</p>	<p>Support – It is vital that we ensure Thame roads are safe for the elderly, for families with children, and those walking to school, on business etc. Reducing the speed limit makes road safer.</p> <p>Also with the rise of electric cars, engines are much quieter, but this can mean that some may step off the pavement because they can't hear anything without checking to see if something is coming. If they do this with cars travelling at 20mph, the risk of terrible injury or death is much lower than at 30mph.</p> <p>We need to do all we can to help people walk more, cycle more and reduce car usage - having a 20mph speed limit may help those who feel anxious about walking or cycling feel safer.</p> <p>Travel change: Yes - cycle more</p>
<p>() Local resident, (Thame, Youens Drive)</p>	<p>Support – Improvement to quality of life for loaf residents in the face of rising traffic</p> <p>Travel change: No</p>
<p>() Local resident, (Thame, Chinnor Road)</p>	<p>Support – The cars and other vehicles speed most of the time in the evenings/night time as a resident on Chinnor Road and a mom of a baby I find it really annoying because is very load the road mostly on weekends</p> <p>Travel change: Yes – walk/wheel more</p>

<p>() Local resident, (Thame, Parliament Road)</p>	<p>Support – I am supporting 20 mph as it is safer for children, families and the community and our environment. Travel change: No</p>
<p>() Local resident, (Towersey, Chinnor Road)</p>	<p>Support – I think 20mph should cover as much of the built area of town as possible for safe to school routes for all. 20mph reduces road casualties and encourages safe walking and cycling, leading to better air quality and healthier lifestyles and reduced CO2 emissions. Travel change: Yes - cycle more</p>
<p>() Local resident, (Thame, Griffin Road)</p>	<p>No objection – Works in other towns and 30 mph is too fast on many side roads Travel change: No</p>
<p>() Local resident, (Thame, Park Terrace)</p>	<p>No objection – This is very necessary for Thame. It was talked about two years ago and is overdue to make the town's streets safer. Travel change: Yes - cycle more</p>
<p>() Local resident, (Thame, Whittle Road)</p>	<p>No objection – Sensible change Travel change: No</p>



Oxford Bus Company
Cowley House
Watlington Road
Oxford OX4 6GA

t 01865 785 400
e info@oxfordbus.co.uk

19th July 2024

By email only: christian.mauz@oxfordshire.gov.uk

Attn: Christian Mauz
Senior Officer (TRO and Schemes), Network Management

Director of Environment & Place
Oxfordshire County Council
County Hall
New Road
Oxford
OX1 1ND

Dear Mr. Mauz,

STATUTORY CONSULTATION – Ref: CM/12.6.390/P0104 – Thame proposed additional 20mph Speed Limits

Thank you for your consultation on this proposal.

I refer to the proposed Traffic Regulation Order changes referenced above. City of Oxford Motor Services Limited (Oxford Bus Company) finds itself in the position of having to make a **strong objection**.

I note that a full set of Statutory documentation is appended to the consultation but that a separate consultation web-form is also involved. The language on the consultation portal can reasonably be read as inviting prior comment on proposals that may or may not be taken forward by the Council. However, the entry of these amendments to the formal statutory process means that such a conclusion would be entirely erroneous, and that the Council is, in fact, committed to progressing these proposals. In fact, there is no mechanism existing that allows alteration of the proposals between publication and them being made by the Council. At the very outset we must say that we consider that the Council is presenting the proposals in a manner that could reasonably be read as being intentionally deceitful and duplicitous.

We consider the proposals unjustified, unjustifiable, and arbitrary, and will serve principally to make public bus services slower and less attractive, while in practice having no credibly demonstrable safety impact.

the City of Oxford Motor Services Limited
registered in England & Wales no. 91106
registered office 3rd Floor, 41-51 Grey St, Newcastle-upon-Tyne, NE1 6EE

Part of the Go-Ahead Group

The proposals are not in conformity with current formal Government guidance set out in the Department for Transport Local Transport Note 01/2013, revised and reissued in April 2024, that concerns the setting of local speed limits. This Guidance was expressly promulgated to clearly signal how Local Highway Authorities should seek to appropriately balance the flow and speed of all kinds of traffic, having regard to both the nature of specific roads, and their purpose, to properly discharge their Traffic Management Duty. This is set out at Section 16 (1) of the Traffic Management Act 2004. This plainly states that:

“It is the duty of a local traffic authority [or a strategic highways company (“the network management authority”)] to manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives—

- (a) securing the expeditious movement of traffic on the authority's road network; and*
- (b) facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.”*

The duty is mode agnostic. Thus, while the legislation elsewhere gives specific weight to the need to consider and properly provide for the needs of non-motorised users, it in no way endorses from first principles a view that facilitating safe and expeditious movement for non-motorised modes should in so doing, have little or no regard to any other mode as a matter of principle.

We find the process followed by the County Council that has led to these proposals to be a cause for at least as great concern. Leaving aside technical specifics, this draft set of Orders represents an iterative process, entirely devoid of rigours or any published evidence, that in no way demonstrates that the clear expectations of national policy and guidance have been considered or applied. Nor do we see any evidence that the statutory Traffic Manager appointed by the Council to discharge the Network Management Duty has had any input or scrutiny of these and a range of other proposals made, or what the outcome of any such scrutiny might have been.

Background

Oxford Bus Company since July 1st 2024, has started to operate a half-hourly service 280 between Oxford and Thame. It originates in Oxford City Centre at Speedwell Street running via Wheatley and Tiddington. As officers will be aware, both these settlements have also been subject to implementation of 20mph limits, on an extensive basis. Additional proposals are being worked up or are under consultation. We have separately raised a formal objection to the proposals to extend the 20mph limit along the entire length of the A418 through Tiddington.

The 280 route is very long established and until the end of July 2024 will have been continuously operated from a depot in Aylesbury by another operator and its direct predecessors, for at least 60 years, over a longer route between Oxford and Aylesbury. This depot will close at the end of this month, and with it, the former operation.

Oxford Bus Company, on its own initiative, and entirely with its own resources, has stepped in to maintain both frequencies and connectivity on the section of route within Oxfordshire, as far as Thame. Another operator has separately established a fast service on the longer corridor altogether omitting Wheatley. We therefore also should highlight that the 280 serves directly to help retaining as frequent a service as possible in Wheatley following the closure of the Wheatley Campus of Oxford Brookes University, whose presence large supported a very high frequency public bus service, now numbered 400. Our replacement 280 service and a reduced level of frequency on the 400 together will maintain a 15-minute service headway between Oxford and Wheatley.

Thus, we have a direct interest for the first time in the way roads facilitating the bus route network in Thame and the wider corridor - which given recent events cannot be described in any way as secure or stable - is stewarded by the Council.

Following several issues whereby a large number of 20mph proposals on key sections of bus routes in Oxfordshire were advanced by the county council following requests from parish councils, which generally had not involved any prior engagement with bus operators, we formally objected to several such schemes. This included the major scheme in Abingdon which affected a very large number of core bus routes.

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

Such a list was provided by OBC and Thames Travel to OCC on 21st March 2023. We were not an operator in Thame at the time.

We and other bus operators have repeatedly advised the Council that the cumulative effect of the blanket application on 20mph limits in this way on bus operations would be material. Across multiple substantial settlements, it cannot but have the effect of slowing buses to down to the point where timetables can be both no longer relevant to large sections of the population, and moreover are no longer operable within the current operating and financial resources.

Thus, the issues we highlight above are well known to the Council and have been consistently and repeatedly expressed, in an appropriate, considered and timely manner. We have been careful to have a very high regard given to balancing the wider objectives of national and County Council policy, with the ongoing need to make buses significantly faster and more reliable. This is axiomatic within the National Bus Strategy for England and carried through into Oxfordshire's Bus Service Improvement Plan (BSIP) as a matter of principle. The Council and bus operators including ourselves, are formally and contractually bound to achieve exactly these objectives both generally and

through specific interventions, in a collaborative manner, through a Statutory Enhanced Partnership (EP).

Clearly, effective collaboration demands a consistent approach involving all the relevant transport and highways function of the Council, not restricted narrowly to the formal operation of the mechanisms set out in the EP. Accordingly we have assiduously and constructively sought to engage with the active travel and highways safety functions within the Council, and this has included informal contributions when we have been granted the opportunity, as well as in numerous formal written responses to specific proposals as they have been made public.

Following bus operator challenge in March 2023, the Council had agreed to include an opportunity for us to comment in advance on emergent 20mph proposals, especially in the most extensive settlements where there are larger numbers of bus passengers and movements on the one hand, and the most extensive lengths of bus route operating within built-up areas.

That we would consider to be just such a settlement.

The proposals

The proposals seek to extend the 20mph limits that already cover over 90% of the public highway within the town, to 4 specific stretches of road that had intentionally been retained at their previous 30mph limit following previous proposals to generally replace the existing 30mph limits within the town with a 20mph sign-only restriction, that have since been implemented recently.

A further two roads under this consultation reflect the extension of the 20mph limit to recently adopted streets in newly-built development that is purposely engineered to keep traffic speeds passively below 20mph: Jane Moreby Road and Massey Road. For the avoidance of doubt, we have no objection to this whatever.

These four other key stretches all have the following common characteristics:

- They are on radial routes extending from the edge of the town - which benefits from a peripheral distributor road and a bypass built in the 1980s – towards the centre.
- They are all formerly classified routes, and the Aylesbury Road and Chinnor Road retain the B4445 classification. The others nevertheless perform a significant local through movement function, and are not primarily used as residential access streets.
- The inner stretches of these corridors running within the historic settlement core are more intimate in nature and reflect higher density of development and activity, and a wider mix of uses in and around the historic market town High Street. On their outer sections that form these new proposals, these routes run through post-war development, much of it planned in such a way that it intentionally turns its back on the roads, in conformity with highways and town planning orthodoxy then prevailing, intentionally to introduce a level of

segregation between vulnerable road users and high levels of traffic, including large vehicles.

- The roads are relatively wide, with generally good forward visibility, and generally significant standoffs between built development and the kerbline. There is very limited “visual friction” arising from the roadside environment that signals and psychologically encourages drivers to generally proceed at slower speeds – LTN01/2013 makes clear that empirical evidence suggests that self-enforcement of a 20mph limit can only be expected to occur if the baseline average speed is at or below 24mph. We see no evidence that these stretches currently achieve this behaviour.
- Entirely in line with the movement function of these roads, each of these 4 routes accommodates a bus service. By far the most significant is the main route between Oxford Thame and Aylesbury, and both our 280 service and a competitor’s X20 service use Oxford Road, with the X20 also using Aylesbury Road. These are core inter-urban services running a minimum of every 30 minutes. Link40, formerly run by our Carousel Buses business and now by another company, uses Chinnor Road. Garden City and Thame Park Road are used by service 121, another tendered operation run by another company, but intended to provide a regular hourly link between extensive recent development on the edge of Thame and Haddenham Station, among other things, which we understand the County Council provides using developer funding.
- The planned expansion of Thame from the late 1970s intentionally sought to create an urban structure that directed motorised movement away from the town centre onto a peripheral distributor road – now the B4012 Tythrop Way – to a very great extent. Walking and cycling links direct into the town exist from most of these more modern developments generally in the form of quiet cul-de-sac heads linked with dedicated paths. While certainly some walking and cycling trips would seek to use the radial routes from their outer edges, this would represent a logical desire line for a relatively small proportion of the population, and an even smaller proportion of the most vulnerable road users, or the least confident.

To be more specific, where the Oxford-Aylesbury bus corridor is concerned, the proposals extend the 20mph limit on Oxford Road a further 950m west to the A418 bypass, and on Aylesbury Road a further 450m to the north. This is now a total of about 2.8km operable at under 20mph; thus, the additional 1.4km of reduced speed limit within the town adds material delay and running time, doubling the 1.35km distance resulting from the imposition of the original 20mph Order now in place.

Again, as we have repeatedly observed, taken on their own, these effects while material, would not be so great as to threaten the attractiveness of the bus offer or materially affect operating costs and revenues. But **this proposal consolidates an already extensive 20mph within Thame and must be viewed in the context of similar proposals in all settlements, large and small, on the line of the route, many of which involve similarly extensive stretches of route.** The application of local speed limits, according to LTN, should have proper regard to the impact on traffic

flow, including, explicit mention of bus journey times. **It is this cumulative impact that is seriously corrosive.**

All this being the case, we conclude that the proposals are both contrary to the guidance in the LTN, fundamentally ill-conceived, will have little real positive impact on the attractiveness of walking and cycling, over and above the 20mph measures already taken in the town. This would be true even if 20mph was the maximum speed that was driven. This is inconceivable. The LTN itself makes plain that high levels of driver self-enforcement cannot be anticipated on such roads. **The only practical effect of the proposals, in real-world terms, will be to make buses slower, and bus journeys less attractive.**

We and the County's other main operators have been making exactly these kinds of representations from the very outset.

In fact, the situation proposed for Thame is highly analogous to Witney, where a blanket imposition of a 20mph limit was imposed, over the objections of Stagecoach, the major bus operator; and which we understand is seeing disappointing levels of driver compliance long after project implementation, particularly on the kinds of road we describe above.

We should also highlight Abingdon, which has extremely similar urban structure albeit in a larger town, where we again made objections, but where we are pleased to record that a more nuanced and considered approach was arrived at through collaborative discussion with officers the Town Council and other stakeholders. This led to the outer ends of radial routes being retained at 30mph. The "Abingdon model" is in essence the current situation in Thame.

No rationale is presented for the Council coming back to revisit this matter in Thame, and we received no prior warning that there was to be a "phase 2" to the initial proposals. Indeed, it appears that one or more senior Council officers have taken it entirely upon themselves to decide, following the completion of due process, that they wish to pursue an "absolutist" approach. The nature of the proposals leads a reasonable observer to conclude these proposals are a retroactive attempt to impose the narrowest conceivable set of solutions to improve the safety of road users, and improve the attractiveness of active travel, without any regard to its wider effects, including on public transport, or even its effectiveness in its own immediate goals. It is thus reasonable to conclude that the proposals largely reflect blind adherence to single axiom, irrespective of context or likely effect, based more on ideology than reason or evidence.

This is both highly inappropriate for any public body, and deeply troubling.

Concluding Comments

This increasingly arbitrary, ill-considered and unevicenced approach to the application of this policy on bus routes is a matter of high and rising concern to us, particularly in

light of previous commitments made by the council regarding advance engagement with us on the limited number of 20mph schemes which we had identified as representing a risk to bus operation. The Council's officers have struggled to keep the commitments it made to us in April 2023, to undertake this pre-engagement. This is yet another such example.

It is especially troubling to us that following our prior input and due process, officers are returning within an extremely short timescale to already-made 20mph schemes to ensure that any major movement corridors are subject to the same treatment as the narrowest and most intricate residential accessways. This is in defiance of LTN01/2013, broad principles within which form the basis for our own input and a suitably prior consensus. These new proposals are being advanced after previous Cabinet Member Decisions without any published evidence to explain who has made these decisions, on what evidence, and to what expected effect. This behaviour clearly and fundamentally breaches both basic levels of trust, as well as good practice.

At no point have we ever expected to Council's officers to agree with us on every point regarding the extent of 20mph limits on major traffic corridors. We recognise not only the Council's prerogative as statutory custodian of the public highway, but also that bus passengers form just one part of the wider community of road users – though this is a constituency that the Council's own adopted policies set out in the Local Transport and Connectivity Plan (LTCP) state that it needs to radically enlarge, if it is to achieve its wider goal to greatly reduce car dependence and its negative consequences, as early as 2030.

Accordingly, we have always taken a pragmatic view with great respect for the Council's need to achieve a frequently difficult balance between conflicting objectives. We have made very large number of material compromises, even when we have considered that the overall outcome will serve to undermine the attractiveness and efficiency of bus services to a material extent, when we can see that there is a wider case to achieve greater benefits across other policy objectives, that positively weigh against our customer's and business' immediate interests.

These among a series of latest proposals, indicate that a sub-set of salaried officers within the active travel function clearly do not share these values, or a viewpoint that places a suitably high value on the need to arrive at a broadly based, considered and balanced view.

We see substantial and increasing evidence that a determined view exists, and is hardening within the relevant parts of the highways function, that the most dogmatic and simplistic approach to managing traffic speeds in built-up areas is the one that they will follow. This has regard neither to LTN 01/2013, nor considered input from ourselves, or for that matter, the County Constabulary, which has consistently cautioned that the arbitrary blanket imposition of 20mph limits is generally unenforceable and without high levels of self-enforcement, will be ineffective, a principle that is also explicit within the LTN.

Within the last 3 months we have invited the Council's officers to re-engage with us, while we consider what prudent steps we should take as a business going forward. It would appear increasingly difficult to justify maintaining our generally optimistic, revenue growth-focused approach, in light of the behaviours currently being exhibited by this part of the Council's highways function. In fact, the positive outcome to such limited dialogue as we have had more recently, has been repeatedly betrayed by subsequent events.

In this light, we find it as troubling as it is regrettable that we have to remind the Council of its duties in Primary Legislation, as well as its contractual commitments in a Statutory Enhanced Partnership. We find it impossible to comprehend how so unbalanced and unevidenced an approach to local traffic regulation can be pursued by the Council when it runs seriously counter to the achievement of multiple other of its own transport policies concerning public transport, while having no demonstrable effect on car use and dependency. We find it equally perplexing that so arbitrary and absolutist an approach is being taken on these outer stretches of generally classified roads, which even taken on its own terms cannot credibly be expected to effective either in increasing active travel, nor on improving the safety of vulnerable road users, who are not in significant conflict with motor vehicles on the stretches concerned. These are actually a tiny fraction of the entire length of public highway in any of the settlements concerned and thus cannot be considered to prejudice the wider achievement of the Council's safety and active travel goals.

So concerned are we that the Council is behaving in an irrational, ineffective, arbitrary and capricious manner, with profoundly damaging potential consequences for the short and longer term attractiveness and sustainability of the bus service offer, that we will be discussing formally through the Enhanced Partnership Board what steps we might need to take going forwards to help the Council return to a more properly considered approach to managing the highway used by bus services, not least to meet its own ambitious policy objectives to improve public transport, and secure the highest level of mode shift to bus ever achieved in the UK as soon as 2030.

The current situation is the culmination of a wider one that shows over at least the last 10 years, that the Council consistently struggles to appropriately govern and control its own internal affairs, discharge its statutory duties, properly work with external parties and stakeholders, or progress projects to delivery in a timely and cost-effective manner.

Where the 20mph policy is concerned, we consider that it is time to seriously consider involving suitable external parties and processes to arrive at an appropriate resolution that will have the effect that:

- The Council is properly and fully discharging its Network Management Duty in accordance with statute
- The Council properly has had regard to the Public Sector Equalities duty, in the promulgation of 20mph limits, given that cycling in particular is not accessible to large numbers of people with Protected Characteristics, while bus use is often their key and only means of mobility apart from walking. Promoting cycling in such an extreme and inappropriate manner, to the systematic,

consistent, and material detriment of bus services is, we believe, a breach of that Duty.

- The Council is accountable to the contractual commitments into which it chose to enter in the Oxfordshire Statutory Enhanced Partnership, specifically those that involve making bus journeys faster and more reliable.

We thus urge the Council to withdraw these current proposals.

At least as important, we wish to sound a clear alarm that we see the Council needing to change its course, and in certain places, its very culture, to ensure that it best secures its policy goals at the least risk, and in the most propitious ways possible.

In closing, we reiterate - once again - our strongest and oft-stated ongoing support for the Council's current transport policy objectives in the round. As always, the current objection is raised not because we wish to in some way derail or obstruct the Council, but to try to ensure that in trying to achieve one objective in an overly simplistic and over-zealous way, other key policy outcomes are not jeopardised. It therefore could not be of greater regret to us that we find the need to make the points that we do, and write in the tone that we have. We trust that we can find the Council's officers and members open to discussing the matters we raise above further, at the earliest reasonable opportunity.

Yours sincerely

Managing Director