

Divisions affected: Shrivenham

CABINET MEMBER FOR HIGHWAY MANAGEMENT – 23 FEBRUARY 2023

SHRIVENHAM: PROPOSED 20MPH SPEED LIMITS

Report by Corporate Director, Environment and Place

RECOMMENDATION

1. The Cabinet Member for Highway Management is **RECOMMENDED** to defer a decision to approve the introduction of 20mph speed limits in Shrivenham as advertised pending further discussions to assess the acceptability of reduced proposals that meet the needs of all parties.

Executive summary

2. The report presents responses to a statutory consultation on the proposed introduction of 20mph speed limits in Shrivenham as shown in **Annexes 1 to 5**.

Financial Implications

3. Funding for consultation and the proposals themselves has been provided by the County Council's 20mph 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 Shrivenham by making them safer and more attractive.

Formal consultation

6. Formal consultation was carried out between 05 January and 03 February 2023. A notice was published in the Oxford Times newspaper, and an email sent to statutory consultees & key-stakeholders, including Thames Valley Police, the Fire & Rescue Service, Ambulance service, Bus operators, countywide transport, access & disabled peoples user groups, Vale of White

Horse District Council, the local District Cllrs, Shrivenham, and Watchfield parish councils, and the local County Councillor representing the Shrivenham division.

Statutory Consultee Responses:

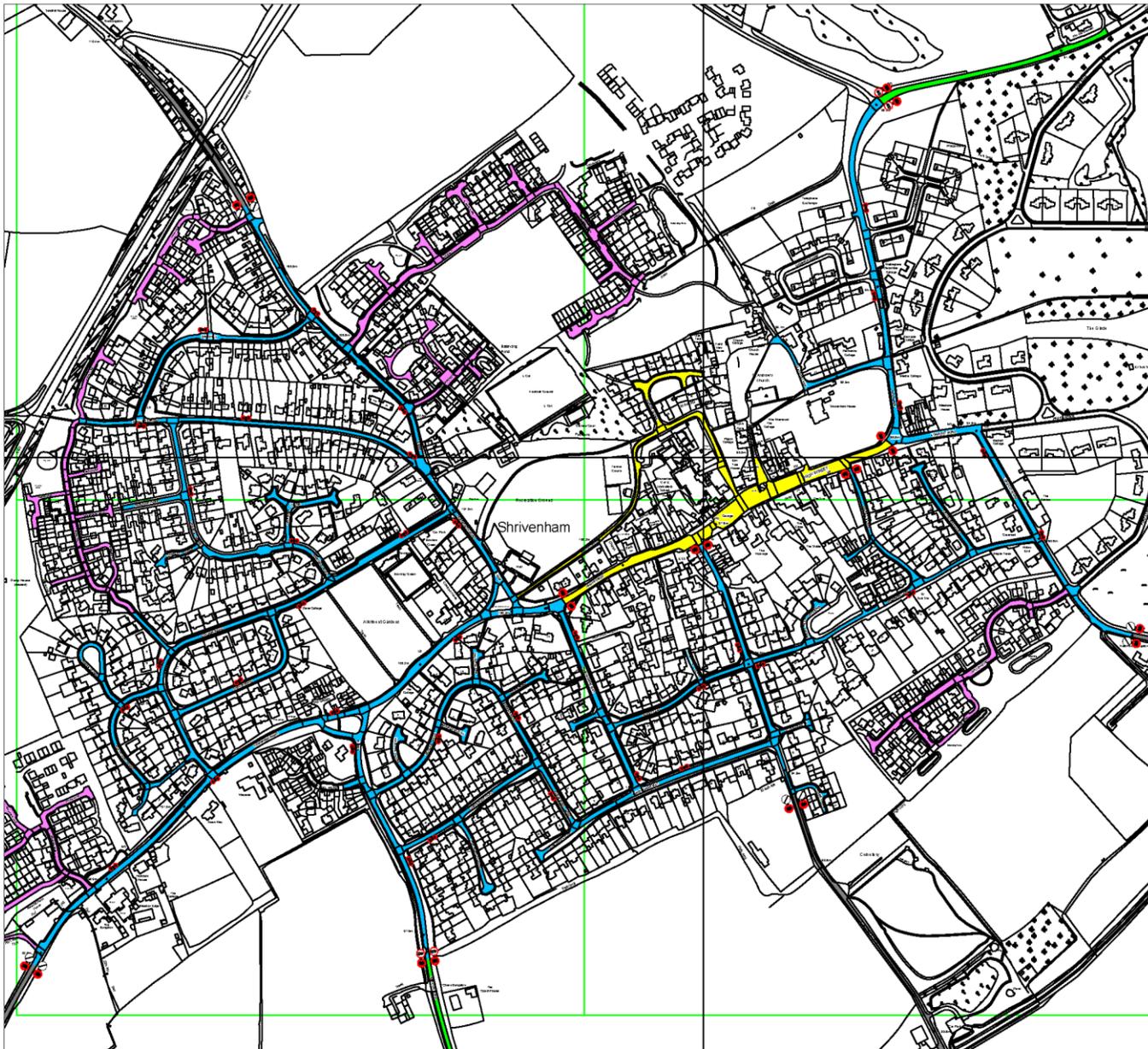
7. Three statutory consultee responses were received. Thames Valley Police responded by re-iterating their views concerning OCC's policy and practice regarding 20mph speed limits and consider their response as 'having concerns' rather than an outright objection. They highlighted the number of roads which are not designated as 'public' Highway, and as such queried the level of signing that would be included for vehicles exiting these roads into the new limit. Stagecoach Bus Company object to the proposals and submitted extensive and detailed comments regarding the locations where the proposals were likely to jeopardise their service viability.
8. Stagecoach consider a 20mph limit appropriate in most areas including the village core and in side streets. They consider a northwards extension of the existing 20mph zone on High Street along Faringdon Road to just beyond the existing chicane is justifiable but urge that the existing 30mph limit is retained along the remainder of Townsend Road to the Highworth Road junction. If the approach taken to applying 20mph limits in Shrivenham is equally extensively pursued in Faringdon, Watchfield, and Kingston Bagpuize, Stagecoach advise they would serve notice to re-route, withdrawing the service entirely from High Street Watchfield, and the loop around Faringdon Town Centre.
9. The OCC Public Transport Development Team's viewpoint aligns closely with that of Stagecoach. The parish council support the proposals.

Other Responses:

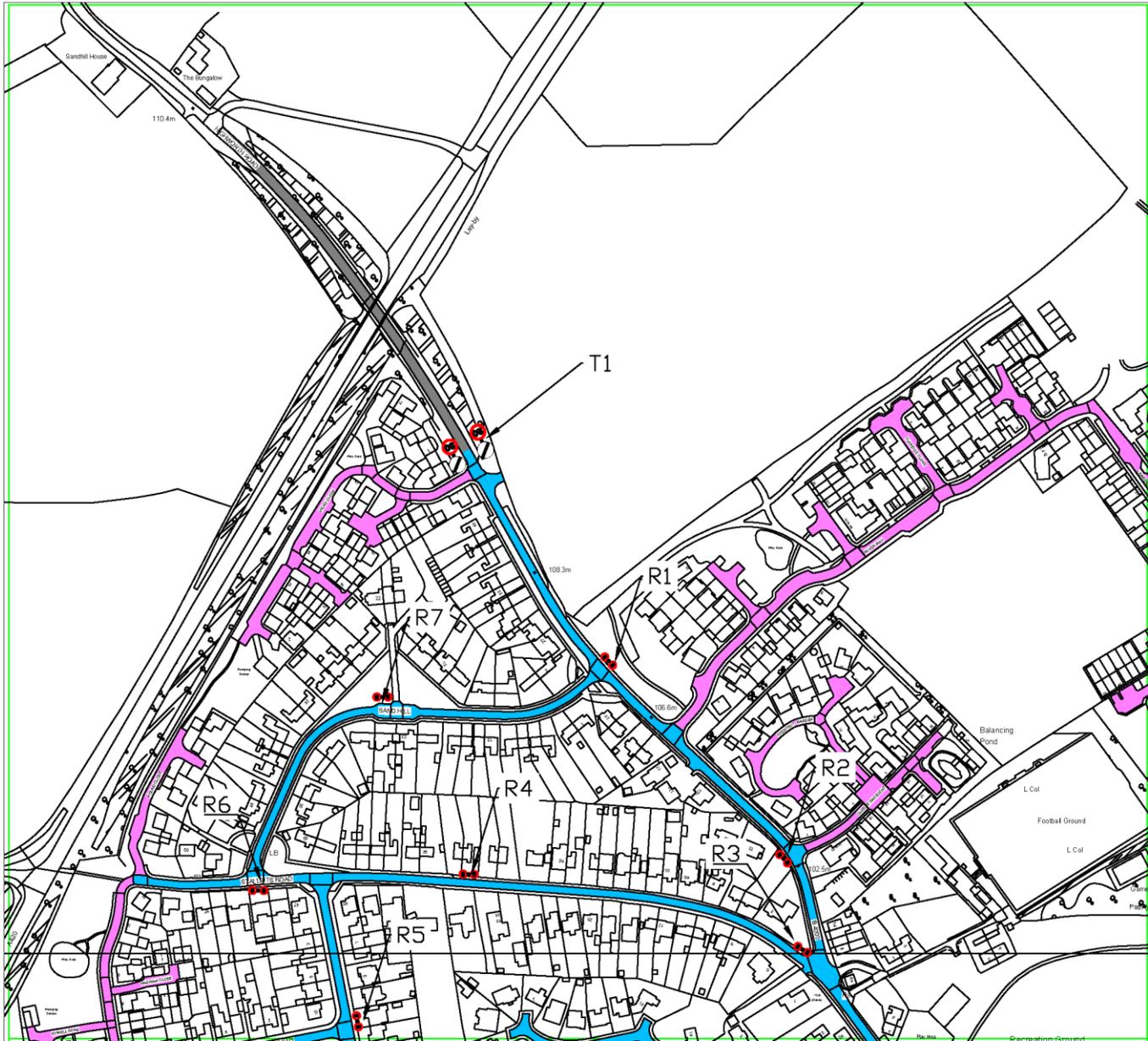
10. Two members of the public submitted expressions of support and a routine objection was submitted by a member of the public from Witney who railed against the proposal in principle suggesting it was a dark day for democracy and the start of a dystopian future with 20mph signs akin to the 'Z' sign displayed universally across Russia.
11. The responses are shown in **Annex 6**, and copies of the original submissions are available for inspection by County Councillors.

Officer response to objections/concerns

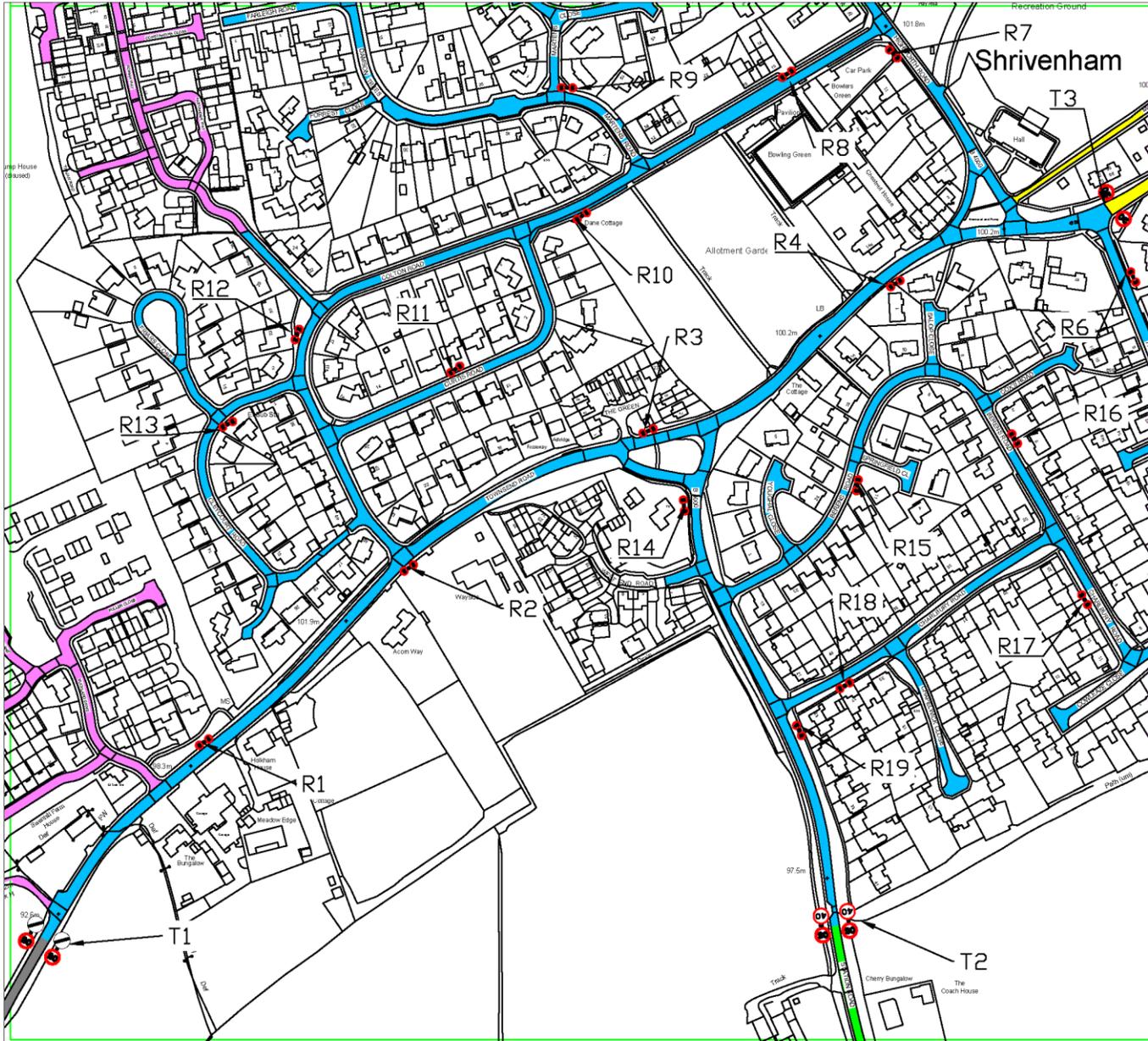
12. The main purpose of the scheme is to improve road safety and encourage greater use of active travel by reducing speeds; this will also reduce accidents. The aim of reducing speed limits is to change driver's mindsets to make speeding socially unacceptable and make more environmentally friendly modes 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'.



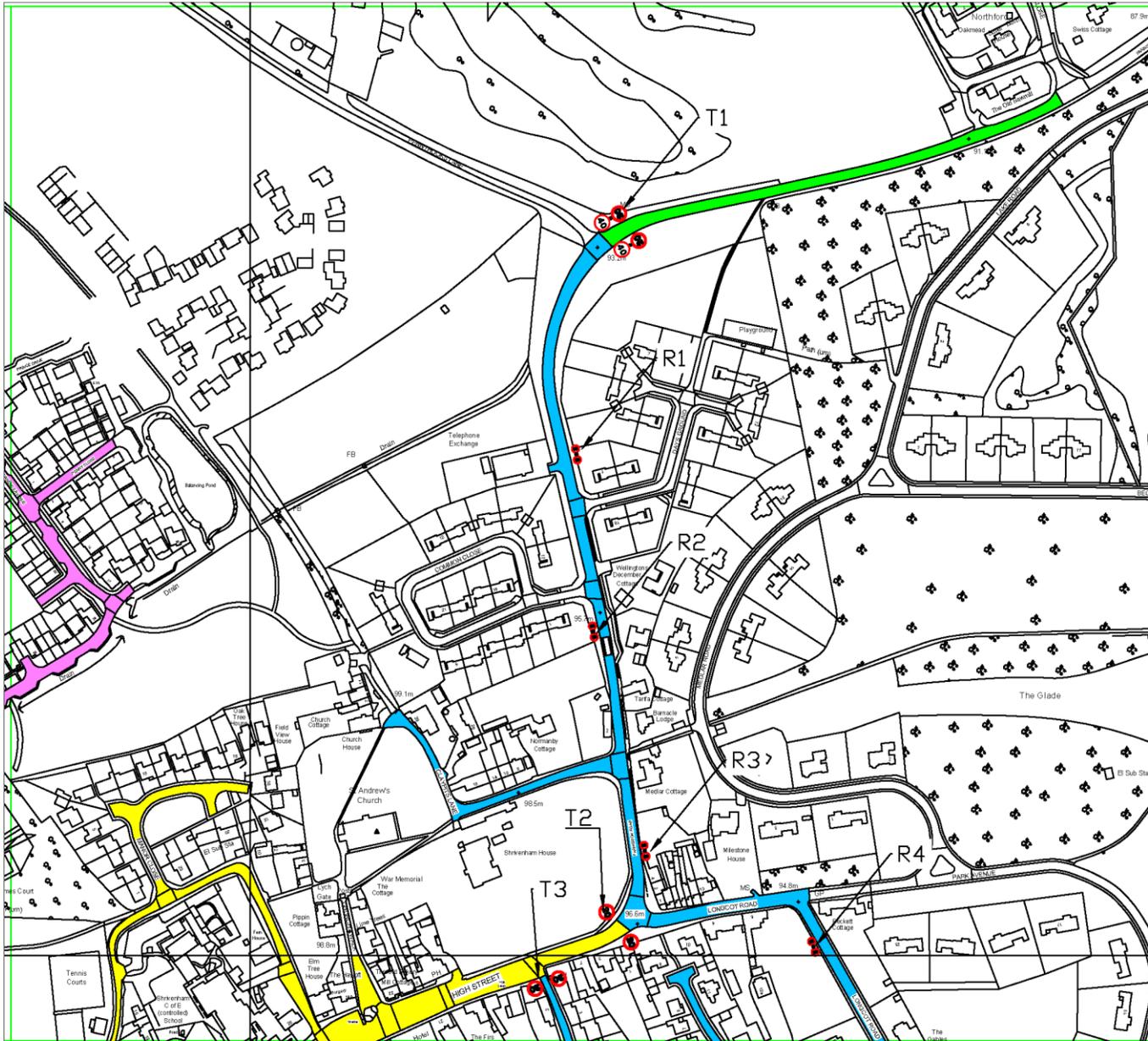
| | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|----------------------------|
| Shrevenham Overview | | Revision 1.0 |
| Legend | | |
| Proposed 20 | | |
| Existing 20 | | |
| Not within Highway Boundary | | |
| Existing 30 | | |
| Existing 40 | | |
| Existing 50 | | |
| Existing NSL | | |
| Not Public Highway | | |
| © Crown Copyright and Database rights 10023343 2017 | | |
| Rev. | Date | Purpose of revision |
| 1.0 | 09.09.22 | Final Draft |
| | | |
| | | |
| OXFORDSHIRE COUNTY COUNCIL <small>Owen Jenkins Director Infrastructure Delivery Communities Oxfordshire County Council County Hall New Road Oxford OX1 1ND Tel: 0845 310 1111</small> | | |
| Project title: Shrevenham 20mph Scheme | | |
| Drawing title: Shrevenham 20mph Scheme Overview | | |
| Drawing Status | | |
| Scale @ A3 | Drawn by: C.R | Checked by |
| Date drawn 09.09.22 | Date checked | Date approved |
| Oxfordshire Project No. & File Ref | | |
| Drawing No. 1.0 | | Revision 1.0 |



| | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|---------------------|
| Shrevenham Sheet A1 | | Revision 1.0 |
| Legend | | |
| Proposed 20 | | |
| Existing 20 | | |
| Not within Highway Boundary | | |
| Existing 30 | | |
| Existing 40 | | |
| Existing 50 | | |
| Existing NSL | | |
| Not Public Highway | | |
| © Crown Copyright and Database rights 10023343 2017 | | |
| Rev. | Date | Purpose of revision |
| 1.0 | 12.09.22 | Final Draft |
| C.R | Checked | Approved |
| OXFORDSHIRE COUNTY COUNCIL <small>Owen Jenkins Director for Infrastructure Delivery Communities Oxfordshire County Council County Hall New Road Oxford OX1 1ND Tel: 0845 310 1111</small> | | |
| Project title: Shrevenham 20mph Scheme | | |
| Drawing title: Shrevenham 20mph Scheme Sheet A1 | | |
| Drawing Status | | |
| Scale @ A3 | Drawn by: C.R | Checked by |
| Date drawn 11.09.22 | Date checked | Date approved |
| Oxfordshire Project No. & File Ref | | |
| Drawing No. 1.0 | | Revision 1.0 |



| Shrevenham Sheet A2 | | Revision 1.0 | | | | | | | | | | | | | | | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------|----------------|---------|--------------|------------|-------------|--------------|-----------------------------|------------|-------------|-----------|-------------|-------------|-------------|------------|--------------|-------------|--------------------|-------------|
| <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th colspan="2" style="text-align: left;">Legend</th> </tr> <tr> <td style="width: 20px;">Proposed 20</td> <td style="width: 20px;">[Blue Box]</td> </tr> <tr> <td>Existing 20</td> <td>[Yellow Box]</td> </tr> <tr> <td>Not within Highway Boundary</td> <td>[Pink Box]</td> </tr> <tr> <td>Existing 30</td> <td>[Red Box]</td> </tr> <tr> <td>Existing 40</td> <td>[Green Box]</td> </tr> <tr> <td>Existing 50</td> <td>[Grey Box]</td> </tr> <tr> <td>Existing NSL</td> <td>[Black Box]</td> </tr> <tr> <td>Not Public Highway</td> <td>[White Box]</td> </tr> </table> | | | Legend | | Proposed 20 | [Blue Box] | Existing 20 | [Yellow Box] | Not within Highway Boundary | [Pink Box] | Existing 30 | [Red Box] | Existing 40 | [Green Box] | Existing 50 | [Grey Box] | Existing NSL | [Black Box] | Not Public Highway | [White Box] |
| Legend | | | | | | | | | | | | | | | | | | | | |
| Proposed 20 | [Blue Box] | | | | | | | | | | | | | | | | | | | |
| Existing 20 | [Yellow Box] | | | | | | | | | | | | | | | | | | | |
| Not within Highway Boundary | [Pink Box] | | | | | | | | | | | | | | | | | | | |
| Existing 30 | [Red Box] | | | | | | | | | | | | | | | | | | | |
| Existing 40 | [Green Box] | | | | | | | | | | | | | | | | | | | |
| Existing 50 | [Grey Box] | | | | | | | | | | | | | | | | | | | |
| Existing NSL | [Black Box] | | | | | | | | | | | | | | | | | | | |
| Not Public Highway | [White Box] | | | | | | | | | | | | | | | | | | | |
| © Crown Copyright and Database rights 10023343 2017 | | | | | | | | | | | | | | | | | | | | |
| Rev. | Date | Purpose of revision | Drawn | Checked | Approved | | | | | | | | | | | | | | | |
| 1.0 | 12.09.22 | Final Draft | C.R | | | | | | | | | | | | | | | | | |
| OXFORDSHIRE COUNTY COUNCIL <small>Owen Jenkins Director Infrastructure Delivery Communities Oxfordshire County Council County Hall New Road Oxford OX1 1ND Tel: 0845 310 1111</small> | | | | | | | | | | | | | | | | | | | | |
| Project title: Shrevenham 20mph Scheme | | | | | | | | | | | | | | | | | | | | |
| Drawing title: Shrevenham 20mph Scheme Sheet A2 | | | | | | | | | | | | | | | | | | | | |
| Drawing Status | | | | | | | | | | | | | | | | | | | | |
| Scale @ A3 | Drawn by: C.R | Checked by: | Approved by: | | | | | | | | | | | | | | | | | |
| | Date drawn: 11.09.22 | Date checked: | Date approved: | | | | | | | | | | | | | | | | | |
| Oxfordshire Project No. & File Ref | | | | | | | | | | | | | | | | | | | | |
| Drawing No. 1.0 | | | | | Revision 1.0 | | | | | | | | | | | | | | | |



Shrevenham Sheet B1 Revision 1.0

| Legend | |
|-----------------------------|--|
| Proposed 20 | |
| Existing 20 | |
| Not within Highway Boundary | |
| 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 |
|------|----------|---------------------|-------|---------|----------|
| 1.0 | 12.09.22 | Final Draft | C.R | | |

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

OXFORDSHIRE COUNTY COUNCIL

Project title: Shrevenham 20mph Scheme

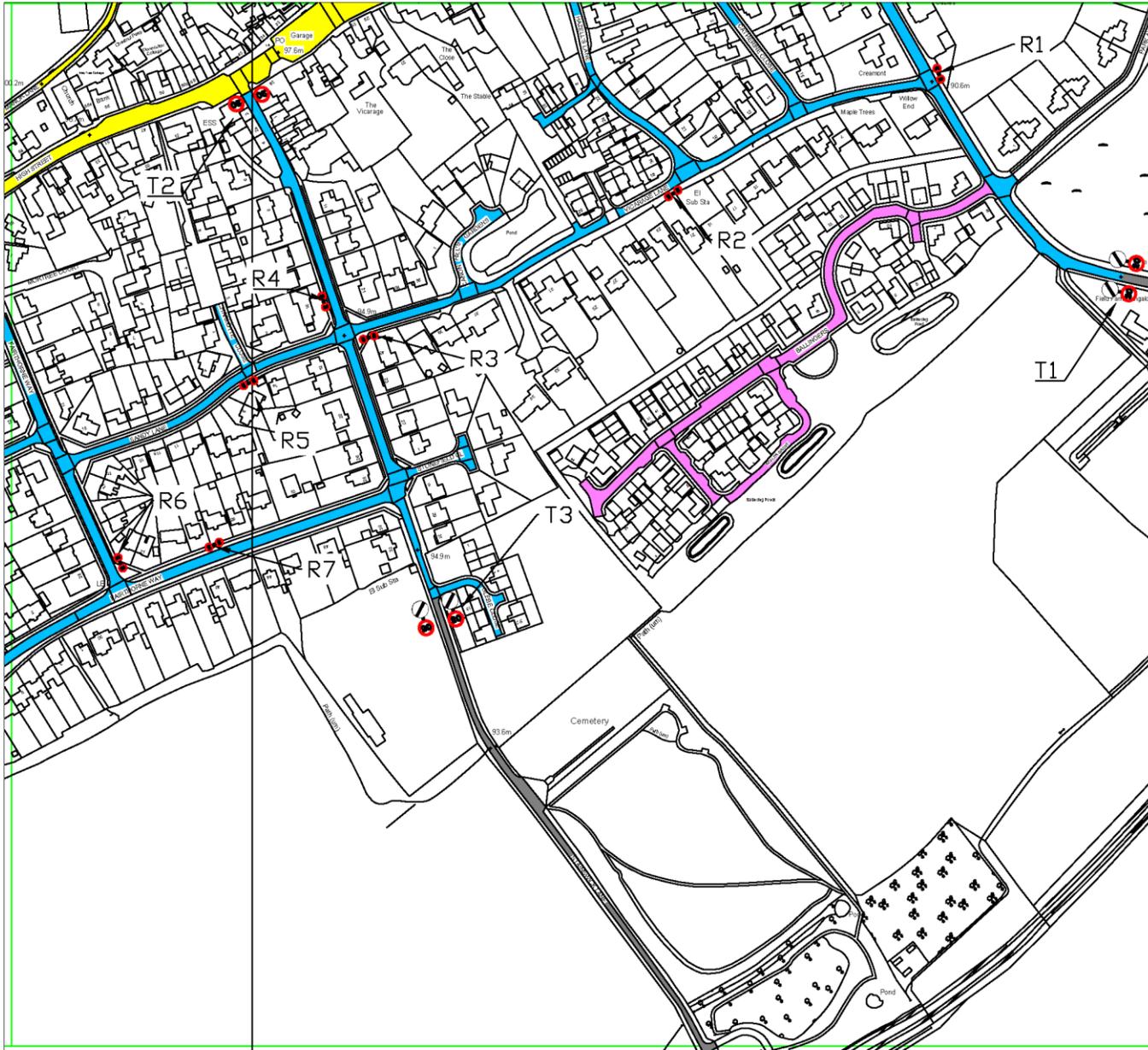
Drawing title: Shrevenham 20mph Scheme Sheet B1

Drawing Status

| | | | |
|------------|----------------------|--------------|---------------|
| Scale @ A3 | Drawn by: C.R | Checked by | Approved by |
| | Date drawn: 11.09.22 | Date checked | Date approved |

Oxfordshire Project No. & File Ref

Drawing No. 1.0 Revision 1.0



Shrevenham Sheet B2 Revision 1.0

| Legend | |
|-----------------------------|--|
| Proposed 20 | |
| Existing 20 | |
| Not within Highway Boundary | |
| 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 |
|------|----------|---------------------|-------|---------|----------|
| 1.0 | 12.09.22 | Final Draft | C.R | | |

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

OXFORDSHIRE COUNTY COUNCIL

Project title: Shrevenham 20mph Scheme

Drawing title: Shrevenham 20mph Scheme Sheet B2

Drawing Status

| | | | |
|------------|------------------------|--------------|---------------|
| Scale @ A3 | Drawn by: C.R | Checked by | Approved by |
| | Date drawn 11.09.22 | Date checked | Date approved |

Oxfordshire Project No. & File Ref

Drawing No. 1.0 Revision 1.0

| 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) |

| | |
|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <ul style="list-style-type: none"> • 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> <p>I also note a number of roads are not Highway . What level of signing will be included for vehicles exiting these roads into the new limit ?</p> |
| <p>(2) Head of Strategic Development and the Built Environment, (Stagecoach Bus Company)</p> | <p>Object - While we accept that there is a case for some extension of 20mph limits beyond the village centre we once again must highlight the effects of this on bus running time, especially when looked at cumulatively. We continue therefore to urge the Council to pursue a more rigorous evidence-based approach in applying this policy.</p> <p>[See full response in Annex 7]</p> |
| <p>(3) Watchfield Parish Council</p> | <p>Support – Watchfield PC fully supports this proposal</p> |
| <p>(4) Local Resident/Member of public, (Witney, Oxford Hill)</p> | <p>Object – It is undemocratic, unethical, divisive and disrespectful for communities of whom can see no need to change the speed limits. Why is that? Because there is no such report advising that the road through the village for example is at 80% risk of death or serious injury if the speed limit is not changed. This consultation if anybody wants to call it that (clearly not) is going to undoubtedly ignore public opinion because the Councillors cannot kick the habit, they bitterly hate anybody that has to do an essential journey in a car.</p> <p>I visit the Town and drive through within the current speed limits when safe to do so to get away from the dystopian 20 mph signs from a nearby town that look like Russian Z symbols you see in a Russian street every 100 yards where it</p> |

made a walk locally at home an utterly bitter and depressing experience knowing that these 20mph signage changes are a political decision and not a road safety decision. I don't take it lightly to compare the Russian Z symbol to a 20mph sign but if the reader googles a Russian city or town what it looks like with the Z symbol in that county it is as comparable as the 20mph sign easily. It is regretful but the honest truth.

Devastating to see Shrivenham that despite seeing zero road incidents within the Town have such a change needlessly taking place that the Police cannot cope with enforcing especially when local Politicians pushing for these changes will undoubtedly carry on going past 20mph as will emergency service personnel when not on emergency calls highlighting a hidden hypocrisy that will take place when the consultation ignores public opinion. If its ok for them it is ok for the rest of us and I hope many residents and within Oxfordshire will come with me to make a stand and that is to say no. No to such depressing road signs and money wasted taking away our future generations common sense. We will be ashamed of what horrid path this Council has chosen, the decision to ignore public opinion and rule within minuit management by edict with no supportive evidence of this change and one that has no loyal compliance even after that. This will undoubtedly depress many residents seeing how needless this was, how robbed their community is of having common sense as per the Highway code and is depressing for passionate motorists that can see that even the study Belfast University did to show that slower speeds don't reduce road incidents either, link here if the individual or senior management are interested in reading. www.transportxtra.com/publications/local-transport-today/news/72511/university-study-questions-impact-of-20mph-limits-in-belfast-city-centre

Shrivenham when visiting has great access for cycling and walking safely so does not make sense and urge all residents to write to MPs, maintain pressure on Councillors and the County Council that for as long as those in charge have one rule for themselves it is ok for the rest of us to decide to drive near to 30mph with competent common sense.

Lets not forget either that this is the same County Council of whose senior official said to the Sunday Times, ""Traffic Filters in Oxford is going to happen definitely"" implying the scheme would go ahead whether public opinion opposed or unopposed leading me to my point that this is the same with the speed limit changes. This Council and their staff should ask this, is it worth continueing this ruinous scheme that will create further political distrust toward local authorities. Is it worth creating distress to residents living there to see these signs every 100 yards as comparable as propaganda. Future generations will be unfortunately robbed of sensible common sense and will see this for what it is. The Highway Code officials do not see a need to amend speed limits so cannot understand this political movement against the motorist.

| | |
|-------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | I do not oppose 20mph signs by a school, town square or retirement community but I am deeply against a blanket speed restriction across a Town or Village when the public opinion is ignored for political propaganda purposes. |
| (5) Local Resident/Member of public, (Shrivenham, Station Road) | Support – Lower speeds lower the risks of serious accidental injury, save on fuel, and reduce environmental pollution in residential areas. |
| (6) Local Resident/Member of public, (Shrivenham, Highworth Road) | Support – Vehicles travelling into Shrivenham (certainly on the B4000 Highworth Road) go from the national speed limit straight to 30mph. Drivers, in the main, do not even attempt to brake for the 30mph limit and are regularly doing in excess of 30mph well past the speed indication sign some 200m further down the road. Drivers exiting Shrivenham on this road seem to think they must be doing 60mph by the time they reach the national speed limit sign. I am an active member of the CSW team and we always record many speed offenders on this stretch of road. A new school is being built, new access to the housing development that is currently being built, and unless some form of traffic calming measures and a reduction of the speed limit were to take place, this is just a serious accident waiting to happen. |



Stagecoach West
Third Floor
65 London Road
Gloucester
GL13HF

January 16th 2023

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

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

Dear Sirs,

Ref: CM/12.6.345 Proposed Shrivenham Speed Limits Order Amendments

1. Background

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

Stagecoach West operates the main bus service in the western Vale of White Horse, being the S6 between the towns of Swindon and Faringdon, and continuing through to Oxford, serving Shrivenham and Watchfield villages en route. The village lies between these two much larger towns just off the main A420 road, Shrivenham has benefited from bus services as a result for many decades. Exceptionally Stagecoach has developed this service from one that in 2001 operated irregularly, to one that in 2019 provided up to 4 buses per hour at peak times, and regular evening and Sunday services to Faringdon, Swindon and Oxford.

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

S6 has been run largely commercially, without public subsidy, for many years until 2021. Most recently significant funding has been applied by the County Council to restore and further enhance the 2019 service level. The County's own revenue support budget for unremunerative but socially necessary services was entirely withdrawn in Summer 2016. To the degree that some services remain funded through the County Council, these are supported by developer funding agreed and required under s106 of the Town and Country Planning Act 1990 (as amended) and the Community Infrastructure Regulations 2010 (an amended), with a view that those service should become financially self-sustaining in the foreseeable future through passenger fares.

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

Cheltenham & Gloucester Omnibus Co. Ltd. trading as Stagecoach West

Registered Office: One Stockport Exchange, 20 Railway Road, Stockport, SK1 3SW (Registered in England & Wales No. 01713578)

the relevance, reliability, efficiency and journey time of the S6 bus service. Any actions that the Council takes that have either an intended or unintended consequences of:

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

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

Stagecoach has considered the proposals set out in the draft Order. These involve, very simply, reducing the speed limit of all roads within in the village 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 the S6 bus services in Shrivenham.

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

2. Stagecoach position of the proposed Order

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

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

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.

Shriveham is a very long established community that has evolved over centuries and its linear form reflects this history. The character of the village is quite heterogeneous alongside the extensive lengths of the road covered by the current 30 mph limits and proposed for reduction to 20 mph.

We accept that there are parts of the village core that are both more built up, and where the character of the through roads are such that a lower speed limit of 20mph is justified.

The most densely populated and built up part of the village, evidently lies in the village centre which is already covered by a 20 mph limit between the junction of the High Street with Longcot Road to the east; and Highworth Road to the West. south of the junction between Carterton Road, Manor Road and Station Road. This is a quite busy area with significant commercial activity, as well as movements of pedestrians crossing the High Street from the south of the village to reach facilities such as the primary school and village hall, that lie to the north. We are well aware of recent housing development south of the High Street, and that a new primary school is to be built in due course to provide additional school places to the north. There is significant direct pedestrian permeability that creates desire lines across the High Street in the village centre.

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

However, the character of the principal east-west route, formerly the A420 until a bypass was constructed in the late 1980s, is very different.

The Order covers the entire length of Townsend Road from Shriveham Road to west of the village. There are now extensive residential developments, especially north of Townsend Road, but very few businesses, all specialist, and nothing that could be considered destinations for large numbers of local journeys by active travel modes, such as shops or community facilities. Townsend Road exhibits the most sporadic of development taking direct vehicular access from the road, mainly commercial premises to the south at the far western end. There are a number of private drives including some serving repurposed former agricultural complexes and some large properties but these are well set back from the road, relatively few in number and allow cars to enter and leave in forward gear. In fact, most development backs onto the road. There is extremely limited pedestrian permeability or rights of way intersecting the road, and only a small number of side roads. For significant distances, the road is flanked by boundary walls/fences or hedges. To the extent that these boundaries provides a high degree of enclosure and somewhat reduce forward visibility, this effectively helps maintain traffic speeds within the current 30 mph limit, including through "visual friction". Given these characteristics, how far a 20 mph limit is self-enforcing is a very moot question in itself.

Footways exist on both sides of Townsend Road within the current 30 mph limit. These do not accommodate cycles and are not of dimensions that would accommodate shared use, but are consistent and generally at least 1.5m wide.

However, from the adjoining residential areas, to the north of Townsend Road the logical walking and cycling routes for the vast majority of dwellings would not use Townsend Road at all, but quieter side streets proposed to be reduced to a 20mph limit, including Colton Road. The clear exception is recently completed development off Buckland Drive. Similarly from origins in side streets south of Townsend Road, a clear direct segregated route parallel to Townsend Road exists using Berens Drive and Salop Close, and a pedestrian link to the Highworth Road junction. The built form thus in effect creates clear logical segregation of the great majority of movements by active travel modes from these parts of the village. This environment strongly exhibits the opposite of "planned mixing" between the public using active travel modes and vehicular traffic.

It therefore no way does not justifies the extension of the existing 20mph limit beyond the Highworth Road junction 870m further west to the far western limit of the village. In practice the only practical effect of this proposal would be to erode the operating efficiency of the bus service.

To the west of the current 20mph zone, north of the Longcot Road mini roundabout on Faringdon Road, the character proposed for downgrade is similarly distinctive. The single carriageway chicane traffic calming feature, tends to reduce speeds well below 30mph by its presence, with traffic needing to be ready to stop to give way to oncoming vehicles. Footways are found mainly to the south of this and are discontinuous.

North of the chicane, they progressively cease, first to the west, such that there is no footway either side north of the Days Ground side road junction. Beyond this point, there is no very clear or obvious pedestrian desire line. Pedestrian traffic uses Days Ground and “cuts the corner” to the north on a paved footpath intentionally segregating these movements substantially from Faringdon Road over this stretch, tying into a continuing footway facility on the south side of Faringdon Road heading towards the entrance to the Defence Academy and Watchfield. There is thus no “planned mixing” of active travel and motorised traffic beyond Days Ground junction over this stretch: rather, the opposite.

In future as pedestrian (and, notionally) cycle connectivity will be secured to Pennyhooks Lane as part of consented development under construction north of Shrivenham (P13/V1810/O; P18/V0862/RM), but this is not accompanied by any proposed alteration to the Pennyhooks Lane junction, nor by the provision of additional footways or other active travel facilities in this area. The pedestrian circulation from this major development (515 dwellings, local centre and new primary school) is in fact heavily oriented towards the south and west from within both this site and the additional land to the north, **not** to the east and south east towards Faringdon Road. We had urged prior to determination that a pair of bus stops be provided in the vicinity of Pennyhooks Lane junction, with associated footways around that junction. We are not clear that even these will be provided. Thus apart from occasional recreational walkers it is unclear there will be much regular active travel use from Pennyhooks Lane south along Faringdon Road – such as might be generated is more likely in fact, to route to the east towards Watchfield, where the existing speed limit remains in place.

In and of itself none of the conditions above present clear justification for northern and eastern extension of the existing 20mph limit as far as the Pennyhooks Lane junction. It could much better be argued that the existing 30 mph remains in place as a buffer towards the chicane and the proposed 20ph could be extended to just north of the chicane, which is about 280m further south than the current proposals. This would be both rational and clearly self-enforcing.

Stagecoach therefore considers a 20mph limit is appropriate in most of the village include the village core and in side streets.

On the route through the village used by the S6 strategic inter-urban bus service, we consider a northwards extension of the existing 20mph zone on High Street for about 250m along Faringdon Road just beyond the existing chicane is justifiable. **However we urge that the existing 30mph limit is retained along the remaining lengths of Townsend Road, as is currently in place, as far as the Highworth Road junction.**

We consider that this reflects an appropriate interpretation of the logic of the Stockholm Declaration and a properly considered and duly balanced application to the context of the 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 specific, if the approach taken to application of 20mph proposed here is carried forward, and equally extensively pursued in Faringdon, Watchfield, and Kingston Bagpuize

with Southmoor, we can advise that the Company certainly would serve notice on the Council and to the Office of the Traffic Commissioner to **re-route service S6, withdrawing the service entirely from High Street Watchfield, and the loop around Faringdon Town Centre**, as this would be operationally infeasible in its current form. Such an approach would mean that there would clearly not be enough time to run the timetable within currently allocated resource.

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

3. Conclusion

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

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

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

Yours sincerely

Head of Strategic Development and the Built Environment