DELEGATED DECISIONS BY CABINET MEMBER FOR TRANSPORT MANAGEMENT

14 NOVEMBER 2024

STADHAMPTON & CHISELHAMPTON – PROPOSED 20MPH & 30MPH SPEED LIMITS

Report by Director of Environment and Highways

RECOMMENDATION

The Cabinet Member is RECOMMENDED to:

Approve the following speed limits, as advertised.

- a) 20mph speed limit in Stadhampton,
- b) 20mph speed limit in Chiselhampton on the B480 Oxford to Stadhampton road, and the B4015 Clifton Hampden Road,
- c) 30mph speed limit on the B480 between Stadhampton & Chiselhampton.

Executive Summary

2. The report presents responses to a statutory consultation on the proposals to introduce a) a 20mph speed limit in Stadhampton, replacing the majority of the existing 30mph speed limit in the process, b) 20mph speed limits on the B480 Oxford to Stadhampton road, and the B4015 Clifton Hampden Road in Chiselhampton, replacing the existing 30mph speed limit, and c) a 30mph speed limit will be introduced on the B480 between Stadhampton & Chiselhampton, replacing the existing 40mph speed limit in its entirety, all as shown in **Annex 1**.

Financial Implications

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

Legal Implications

4. No legal implications have been identified in respect of the proposals, with proposed changes to existing Traffic Regulation Orders governed by the Road Traffic Regulation Act 1984 and other associated procedural regulations. Failure to adhere to these statutory processes could result in the proposals being challenged.

Equality and Inclusion Implications

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

Sustainability Implications

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

Formal Consultation

7. Formal consultation was carried out between 03 and 25 October 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, Stadhampton Parish Council, and the local County Councillor representing the Berinsfield & Garsington division.

Statutory Consultee Responses:

- 8. Thames Valley Police re-iterated their views concerning OCC's policy and practice regarding speed limits, and wish their response to be listed as 'having concerns' rather than an objection.
- 9. Oxford Bus Company submitted an objection to the proposals for Chiselhampton, and the 30mph proposals between Chiselhampton and Stadhampton, stating them likely to be ineffective in achieving the stated aims of the policy, which would further hinder the efficient and reliable operation of bus service no.11. However, they offered no objection to the proposals for Stadhampton. The full response is available at **Annex 3**.

Other Responses:

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

Proposal	Object	Partially	Support	No objection	Total
		support		objection	

Stadhampton 20mph limit	8 (24%)	-	23 (70%)	2 (6%)	33
Chiselhampton 20mph limit	8 (24%)	3 (9%)	21 (64%)	1 (3%)	33
B480 30mph speed limit	5 (15%)	5 (15%)	17 (52%)	6 (18%)	33

11. Those who responded online, were also asked whether if the 20mph speed limit proposals were implemented, would it likely influence a change to their mode of travel in the area, the results of which are shown below:

Travel Change	Number
Yes – walk/wheel more	10 (30%)
Yes - cycle more	3 (9%)
No	19 (58%)
Other	1 (3%)
Total	33

- 12. Additionally, an email was received directly, supporting the proposals.
- 13. The responses are shown in full at **Annex 2**, and copies of the original responses are available for inspection by County Councillors.

Officer Response to Objections/Concerns

- 14. The main purpose of the scheme is to encourage greater use of active travel by reducing speeds; this will also reduce accidents. The aim of reducing speed limits is to change driver's mindsets to make speeding socially unacceptable and make more environmentally friendly modes of travel such as walking and cycling more attractive and also reduce the County's carbon footprint. This forms part of a countywide programme of works that seeks to deliver 'a safer place with a safer pace'.
- 15. Oxford Bus Company do not object to the proposals for Stadhampton, but object to the 20mph limit through Chiselhampton and the 30mph limit between the two villages. Bus services would be impacted over a length of approximately 1070m, which will cause a theoretical increase in journey time of 28 seconds, based on driving the full length at 20 and 30mph rather than at 30 and 40mph. There is one pair of bus stops in Chiselhampton.
- 16. The authority considers objections along the lines of it being unjustified, anticar, a waste of money, not enforceable or pointless to not warrant amendments to a proposal. As such the authority has not addressed any specific comments made of this nature in this report.

Paul Fermer Director of Environment and Highways

Annexes Annex 1: Consultation plan

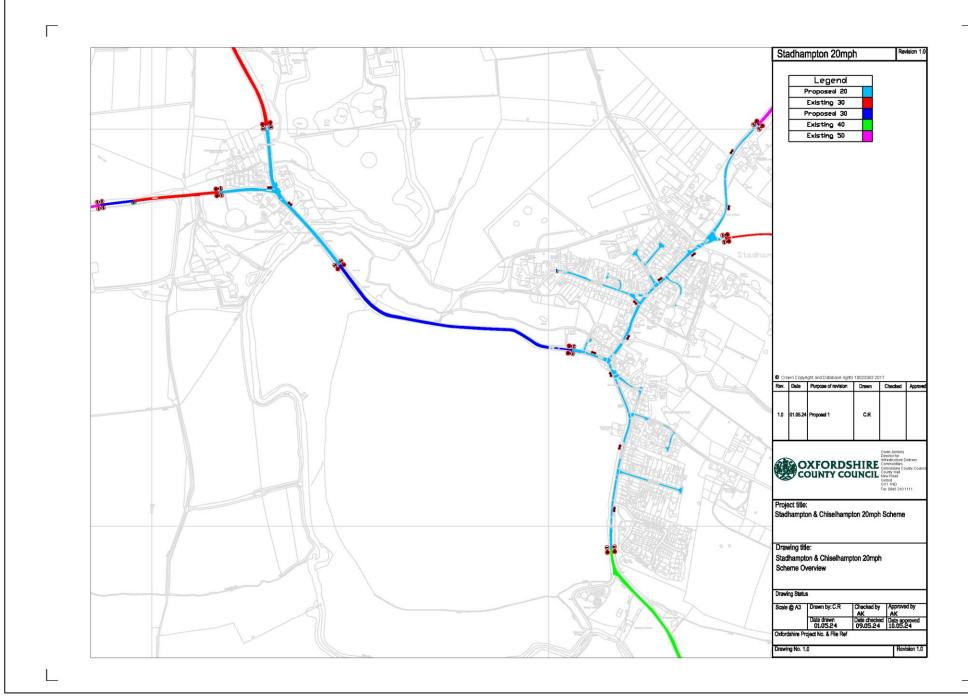
Annex 2: Consultation responses
Annex 3: Oxford Bus Company response

Contact Officers:

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

November 2024

ANNEX 1



RESPONDENT	COMMENTS
(1) Traffic Management Officer, (Thames Valley Police)	Object – Concern and Object to the proposed 30 between the 2 villages Thank you for the consultation documents, in relation to the proposed speed limit change. First I raise objection to the proposed 30mph limit between the two villages. This change is completely contrary to Circular Roads and should remain at 40mph. Thames Valley Police welcome the opportunity to engage on plans for road safety improvement and acknowledge that 20mph limits can be a useful tool in road safety. There are other reasons 20mph limits may be desirable for communities, such as environmental concerns, and creating a shared space environment to encourage greater diversity of road users. Compliance with 20mph limits is a challenging issue as there is a difference between the achievable results of the various available schemes. For example a sign-only scheme will only have a limited effect on the mean speeds, as opposed to other schemes that influence the road environment, which is recognised as being key to achieving compliance. If a speed limit is set too low and is ignored then this could result in the vulnerable road user being less safe. It can also cause a dis-proportionate number of drivers to criminalise themselves and could bring the system of speed limits into disrepute. Thames Valley Police have no policy to enforce based on arbitrary speed limits alone but will enforce based on threat of harm, risk and resourcing. 20mph limits are not excluded from this and will be enforced where appropriate. There should be no expectation that the police would be able to provide regular enforcement if a speed limit is set too low as this could result in an unreasonable additional demand on police resources and there are no additional resources available to support extra enforcement. Messages from partners that police will not enforce need to be discouraged. Such messaging can encourage non-compliance and should be avoided. The policy of Thames Valley Police is to use sound practical and realistic criteria (Setting local speed limits - G

	The key factors that should be taken into account in any decisions on local speed limits are:
	 history of collisions road geometry and engineering road function composition of road users (including existing and potential levels of vulnerable road users) existing traffic speeds (No data provided) road environment
	However I recognise Oxfordshire County Council now have their own Policy for Setting Speed Limits and I expect full compliance of that policy going forward in relation to both monitoring, future engineering and self-enforcement through Community Speed Watch.
	Our stance remains that primarily 20 mph speed limits and zones should be self-enforcing
	Speed limits should be considered as part of a package of measures to manage vehicle speeds and improve road safety. Changes to the highway (for example through narrowing, providing vertical traffic calming or re-aligning the road) may be required to encourage lower speeds in addition to any change in speed limit. Though these may be more expensive, they are more likely to be successful in the long term in achieving lower speeds without the need for increased Police enforcement to penalise a substantial number of motorists.
(2) Managing Director, (Oxford Bus Company)	Object – see Annex 3
(3) Local resident, (Stadhampton, Lucerne Drive)	Stadhampton 20mph – Object I find 20mph just too slow and going from typically 50 into our villages down to 20 just seems unnecessary. How many serious injuries have happened in S&C? I know of very few, and those don't appear to have obeyed the 30 so Chiselhampton 20mph – Object Same as for Stadhampton B480 30mph – No objection Just keep the whole thing at 30. Silly to pop up and then down again.

	Travel change: No
(4) Local resident, (Stadhampton, Cat Lane)	Stadhampton 20mph – Object Not aware of any safety concerns from current speed limits. With the large number of new houses being built locally, which will lead to more traffic passing through, a slower speed limit will increase congestion. Chiselhampton 20mph – Object As previous B480 30mph – No objection No objection to the idea whole stretch being a 30mph zone Travel change: No
(5) Local resident, (Chiselhampton, Chapmans Close)	Stadhampton 20mph – Object Makes planning permission easier for new builds. Chiselhampton 20mph – Object Makes planning permission for new builds easier. B480 30mph – Object Makes planning permission for new builds easier. Travel change: No
(6) Local resident, (Chiselhampton, Hapmans Close)	Stadhampton 20mph – Object Totally disagree there is no evidence to sustain this and a complete waste of money that could be spent elsewhere. Chiselhampton 20mph – Object There are many reasons why I'm against this , it's a complete waste of money.

	B480 30mph – Object Absolutely sick of all these speed limits and being told what to do Travel change: No
	Stadhampton 20mph – Object This in its name will slow the traffic going through the village and so make it a night mare coming out of the side roads! People already don't let anyone out in the mornings and evenings. As what has happening in newnham courtney. And this then slows down the traffic which in case takes longer to travel through.
(7) Local resident, (Stadhampton, Cratlands	This will make no difference as like the rest of Oxfordshire, you put these things in regardless of what people actually want!
(Stadnampton, Cratiands Close)	Chiselhampton 20mph – Object The is on 20 maybe 30 meters but you will change the main road down the hill which is already 30mph which has no reason to be 30mph other then to have a camera van to catch people out. Changing the speed limit will not stop Bikes going through at 50mph.
	B480 30mph – Object This does not need to be changed as people in cars and bikes will still go 40mph. Travel change: No
(8) Member of public, (Woodcote, Reading Road)	Stadhampton 20mph – Object While the decision-makers are obviously obsessed with setting blanket speed limits without listening, I am against the 20mph proposal for the following reasons: 1. Road conditions: The A329 and B480 sections covered are in EXTREMELY good condition with proper pedestrian footpaths. They are major roads that benefit many road users. The villages are in a rural area where most residents rely on bus and car, and the proposed blanket approach creates a large low-speed zone that takes people more time to get through. The area has a low number of residential properties and the proposed speed limits won't really help them. 2. The blanket 20mph approach is not scientific as claimed. The decision-makers simply took the news headline '20mph reduces collisions by xx%', while ignoring the

fact that the speed restrictions in those trials were deployed in high-risk areas. In Oxfordshire, many of these low speed zones are being deployed in low-risk areas with no accident history, few residents, and good roads. 3. According to statistics data, only 3 out of 1000 people in Oxfordshire might die from traffic accidents over 80 years. The blanket 20mph approach means that the remaining 99.7% will need to slow down for them in the rest of their lives. 4. The proposal does not conform to the Department of Transport guidance in setting local speed limits 'only introduce 20mph limits and zones, in the right places, over time and with local support in urban areas and built-up village streets that are primarily residential, using the criteria in Urban speed limits' and '20mph schemes should be considered on a road-by-road basis based on the safety case to ensure local support, not as blanket measures. Particular consideration should be given to maintaining through routes for motorists.' 5. It is very likely that the claimed improvement of 20mph reflect the fact that a small number of high-risk road sections were covered, while the blanket approach without proper risk assessment simply impacts everywhere, including many low risk areas, which is inefficient. 6. Air pollution and noise, if these issues really exist, should be addressed by technology such as the adoption of Electric Vehicles instead of blocking the roads.

Chiselhampton 20mph – **Object**

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B480 30mph – **Object**

While the decision-makers are obviously obsessed with setting blanket speed limits without listening, I am against the 20mph proposal for the following reasons: 1. Road conditions: The B480 sections covered are in EXTREMELY good condition and what people need is to have the footpath cleared and widened. The road section is a major road that benefit many road users. The villages are in a rural area where most residents rely on bus and car. The area has a low number of residential properties and the proposed speed limits won't really help them. 2. Air pollution and noise, if these issues really exist, should be addressed by technology such as the adoption of Electric Vehicles instead of blocking the roads.

Travel change: No

Stadhampton 20mph - Object

20 mph zones are dangerous as people spend more time looking down at their speedometer than at the road. Further more, since many drivers seem to ignore the 30 mph limits, they're hardly going to comply with 20mph. It would be better to have measure to ensure people realise they're entering a village. ie. white "gates" either side of the road and speed reminder LED signs.

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B480 30mph – Partially support

I neither support nor object to this (there isn't an option for that in your tick boxes).

It's not the speed that's the problem on this road but the fact that people cross the white lines on the bends.

Travel change: Other

This option is the only way to get a text box to write a comment. Surely you can't be serious. We're in a village with very poor bus service and far to far away from anywhere for the average person to cycle. I will definitely use my car.

(9) Local resident, (Stadhampton, Cratlands Close)

(10) Local resident, (Chiselhampton, B480)	Stadhampton 20mph – Object Unfortunately 20 mph speedlimits have been shown tonslow traffic down to a point where jams are more frequent and thereby pollution increased Chiselhampton 20mph – Object Unfortunately 20 mph speedway restrictions slow traffic down to a point where jams become more frequent and pollution increases as a result. B480 30mph – Support This stretch has a natural flow of traffic for a 30 mph restricion Travel change: No
(11) Local resident, (Chiselhampton, B480/B4015)	Stadhampton 20mph – Support I do feel that 20 MPH within Stadhampton would be useful and effective, a short built up area, with many difficult turnings and access roads. It just makes sense and feels right. I often find myself doing 20MPH, as it feels like 30 is too much. Chiselhampton 20mph – Partially support It is sad that the only reason I chose to partially support this, is because I feel there is no other option available. The present 30MPH limit is perfectly adequate, but is quite simply not being enforced or adhered to. We have asked for traffic calming and speed cameras and police officers, to force drivers to slow down, but have been told that none of these things are likely to happen. So we seem to be being forced into these modifications instead, as our only available option. But, at least it is something. I just hope that this WILL be enforced, otherwise there is a risk the effort and money will be wasted. My experience from other similar villages, is that 20MPH might be achievable in peak times but rarely outside peak, when it is most important to be adhered to. And, it is not being enforced. My biggest issue is speeding motorbikes and we all know the police will not even pursue or prosecute them, so from my point of view I find these changes piecemeal at best and a waste of time and money at worst. I doubt very much that they will encourage people to change their behaviour and use other forms of transport. The bus services are good, but not regular or flexible enough and there are NO safe cycle lanes or routes. B480 30mph – Object

	I think 40MPH is perfectly OK, there are no entrances or exits, providing the footpaths are kept clear and maintained there is no need to change the limit. Travel change: No
(12) Local resident, (Chiselhampton, Chapmans Close)	Stadhampton 20mph – Support Safety of children and residents Chiselhampton 20mph – No objection Speed through the village is excessive and has seen many crashes in the last 24 months, including fatalities B480 30mph – No objection Consistent speed will improve safety Travel change: No
(13) Local resident, (Stadhampton, Lucerne Drive)	Stadhampton 20mph – Support Traffic is heavy during peak times and travels too fast through the village with scant regard for school crossings, bus stops and garage users. Large, heavy vehicles carrying too much speed cannot respond quickly. We should not wait for a fatal accident to take action. Chiselhampton 20mph – Partially support Chiselhampton needs junction improvements where the B4015 joins B480. Reducing speed could help but this junction is not safe. B480 30mph – Partially support No reason for 30mph limit on this stretch of road Travel change: No
(14) Local resident, (Stadhampton, Thame Road)	Stadhampton 20mph – Support Slow the traffic outside our gate (Millstream House)

	Chiselhampton 20mph – Support As above B480 30mph – No objection Doesn't make much difference Travel change: No
(15) Local resident, (Stadhampton, Thame Road)	Stadhampton 20mph – Support I live on the main road in Stadhampton and would welcome 20mph speed limit as the volume of traffic through the village is very heavy and find it very difficult to exit my property either via a car or on foot. as the traffic at present travels at 30mph plus. through the village. Chiselhampton 20mph – Support makes sense to slow traffic down through Chiselhampton. B480 30mph – No objection The road between Stadhampton and Chislehampton has several bends and really would be sensible to have a 30mph instead of present 40mph on such a short stretch of road. Travel change: No
(16) Local resident, (Chiselhampton, B480)	Stadhampton 20mph – Support Too many accidents Chiselhampton 20mph – Support Too many accidents on the main b480. B480 30mph – Partially support Not sure there is a need to reduce speed there.

	Travel change: No
(17) Local resident, (Stadhampton, Thame Road)	Stadhampton 20mph – Support Some drivers speed through The Village. It might discourage Drivers and HGVs from diving through the Village hpefully! Chiselhampton 20mph – Support see above B480 30mph – Partially support see above Travel change: No
(18) Local resident, (Stadhampton, Thame Road)	Stadhampton 20mph – Support I think this will reduce the general speed of vehicles through the village, thus making it safer. To this end I would like to see the 20mph limit continued on the B480 across the green as the green is used continually for dog walking by the animal sanctuary and for recreation leading to many people crossing the road at this point Chiselhampton 20mph – Support I think this will reduce the general speed of vehicles through the village, thus making it safer B480 30mph – Partially support There are no houses along this route so the higher speed limit is justified. I'm not sure it needs to be reduced to 30mph Travel change: No
(19) As part of a group/organisation, (Oxfordshire Cycling Network)	Stadhampton 20mph – Support We support this speed limit reduction based on growing evidence from Wales, London and other UK cities that 20mph limits result in a 20-30% reduction in road casualties across all users: pedestrians, cyclists, motorcyclists, motorists

and their passengers. This happens even with current low levels of enforcement, although we consider that better enforcement should also be applied. The scheme is aligned to 'where the people are' - where they live and are likely to be walking.

This is a busy route, but the speed reductions to 20 and 30 are well considered and will improve safety. Lower speeds will encourage the use of public transport, and when sat nav systems catch up, drivers will be re-routed on to more suitable routes for high--volume traffic.

We support Oxfordshire's policy of 20mph limits with community support and schemes designed to be where the people are. Lower speeds also create a more friendly street environment for people to walk, wheel and cycle, encouraging healthy forms of transport that reduce road danger further, reduce traffic, reduce damage to the environment, and lead to healthier and happier lives.

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B480 30mph – **Support**

The 30mph section linking the two villages is a short section and with the villages at 20, then 30 will be an appropriate speed. This will encourage some drivers to use more suitable routes, such as the M40.

Travel change: No

	Stadhampton 20mph – Support Most of the nearby villages have 20mph limits. Not having the same here implies speeding is less unacceptable. Many people need to cross the road, especially near the petrol station corner where it is difficult to see both directions of traffic. Speeding traffic increases the risk of being hit.
	Chiselhampton 20mph – Support The light-up speed signs, and local speedwatch group, indicate that a large proportion of traffic is exceeding the speed limit, often by a large degree.
	Increased speed increases noise and exhaust pollution in the village and may increase the risk of damage to the listed bridge and nearby houses.
(20) Local resident,	Over the last few years there have been a number of accidents in the village, often near very near the bus stop in the peak morning and evening hours when people may be standing there waiting. Reducing the speed limit may mitigate that risk to some extent.
(Chiselhampton, B480)	Traffic speeding around the corner near the pub increases the risk to pedestrians crossing the road and to cars leaving the car park.
	There is no pavement on the B4015, a route frequently used by walkers and dog owners. Speeding traffic increases the risk to them.
	Most of the nearby villages have 20mph limits - not having the same in Chiselhampton tends to suggest that speeding is less of a concern and hence more acceptable there. The small size of the village means slowing to 20mph will have a minimal impact on journey times.
	B480 30mph – Support Even though the pavement and verge between the villages has just been cleared, it is still narrow and brings pedestrians very close to traffic often travelling at high speeds.
	Reducing the speed of traffic between the villages may encourage traffic to drive more slowly through the villages.

	Travel change: Yes – walk/wheel more
(21) Local resident, (Chiselhampton, B480)	Stadhampton 20mph – Support I am in Chiselhampton, but feel a 20mph in Stadhampton is equally important for the benefit of the residents there. Chiselhampton 20mph – Support Although the road through Chiselhampton is currently 30mph, it is not observed by the majority of the traffic. I support a reduction in the speed to 20mph in an attempt to slow some of the traffic to something like a reasonable level. The road seems to be getting busier and busier, there are frequent accidents, and flooding incidents. It feels unsafe to try to cross the road, or walk alongside it. It is difficult to pull out of the drive in the morning due to the speed of the oncoming traffic. The vibrations from the thundering lorries actually shake the house, and the increased noise of the speeding cars and motorbikes cause increased noise pollution. B480 30mph – Support The cars drive way over the current 40mph currently, and slowing to 30 instead will give more likelihood of them observing the 20mph. Plus, it is a road full of bends and would be much safer for cyclists and pedestrians to slow the traffic the whole way along. Travel change: Yes – walk/wheel more
(22) Local resident, (Chiselhampton, B480)	Stadhampton 20mph – Support There are a lot of children and families walking and crossing the road. Chiselhampton 20mph – Support Since living in Chiselhampton, I recall at least 3 crashes, one where someone died. My teenage children find cycling on the road very stressful when leaving or returning to the house. When walking the dog, we often find it stressful and difficult to cross the road in order to access the public footpaths. When exiting our driveway, car speed around the corner so fast, it's hard to drive out safely. B480 30mph – Support With all the bends, it will be safer for cycling. It will also help drivers keep there speed under control before entering either village.

	Travel change: Yes - cycle more
(23) Local resident, (Chiselhampton, B480)	Stadhampton 20mph – Support People speed through the village which is used as a rat run to avoid the Oxford ring road. As a local resident the speeding motorists not only create excessive road noise, but it is also difficult to pull out of our drive to go to work. As a dog owner, it is virtually impossible to cross the roads safely, particularly during peak times like commuting traffic and school opening/closing times. The 20mph would make it safer for local residents to walk in the village, particularly since there are hardly any footpaths.
	Chiselhampton 20mph – Support The 20mph would make the village safer, considering the numerous car crashes we have encountered, the last one resulted in a fatality. The proposal is reasonable as drivers should slow down anyway when travelling through a residential area. The lowering of the speed limit should reinforce this.
	B480 30mph – Support This seems a good measure to slow down the traffic between the villages to then come into Chiselhampton at a slower speed.
	Travel change: Yes – walk/wheel more
(24) Local resident, (Chiselhampton, Clifton Hampden Road)	Stadhampton 20mph – Support I am supportive of the proposals as I consider the proposed changes will reduce speeding and accidents especially within Chiselhampton village. I question why not all side roads are included in Stadhampton but there may be a reason for this which I am not aware of.
	Chiselhampton 20mph – Support I support the proposals as I believe this will help reduce speeding and accidents within the village and make it safer for pedestrians.
	B480 30mph – Support I support these proposals as it will make it safer for pedestrians walking between the two villages to access local amenities etc.

	Travel change: Yes – walk/wheel more
(25) Local resident, (Chiselhampton, B480)	Stadhampton 20mph – Support Too much speeding in villages by people who don't live anywhere near here and don't care about the local residents. Chiselhampton and Stadhampton are used as a rat run between the M40 and Abingdon & Didcot & A34 to avoid Oxford ring road.
	Chiselhampton 20mph – Support I co-ordinate the Community Speedwatch in the village and spend hundreds of hours recording speeds. From our data, the average speed of speeders is 40mph and when we are not on the roadside we know that 72% of drivers are exceeding 34mph.
	The start of the 20mph on the Clifton Hampden road needs to be pushed back to the entrance to Camoys Court. This is where we record the highest speeds in the village, every session here we record some drivers exceeding 50mph.
	B480 30mph – Support It might slow down the drivers entering Chiselhampton from Stadhampton, this is where Community Speedwatch record the highest number of speeders.
	Travel change: Yes – walk/wheel more
(26) Local resident, (Chiselhampton, B480)	Stadhampton 20mph – Support We live just inside the 30 mph zone and traffic continues to drive past our exit very fast. We have to exit with a mirror and it is very dangerous. We have children that use the footpath and it is too dangerous
	Chiselhampton 20mph – Support I fully support as it is dangerous. We live on the road and find it difficult to pull onto the road to exit our property
	B480 30mph – Support We would use the footpath to walk on if it was lowered to 30mph
	Travel change: Yes – walk/wheel more

(27) Local resident, (Chiselhampton, B480)	Stadhampton 20mph – Support Many drive too fast so would help with safety + see my lengthier comments in the Chiselhampton response box which is where I live. Chiselhampton 20mph – Support Support in the hope that overall sieed be reduced for safety all round. Realise some folk who speed may not slow down but if more did then that enabled villagers and other drivers feel and be safer. We have had many accidents in Chiselhampton with several fatalities and many minor injuries. A a first aider I cannot ignore when hear collision and always go out to help. Distressing and dangerous quite often. B480 30mph – Support Currently does not feeling safe enough to cycle between villages due to traffic speed - folk often over speed limit, and would also help keep do overs at lower speed when they reach 20mph zones. Travel change: Yes - cycle more
(28) Local resident, (Chiselhampton, Clifton Hampden Road)	Stadhampton 20mph – Support Traffic is traveling to fast through the village. Chiselhampton 20mph – Support Traffic traveling too fast through the village . B480 30mph – Support Keeps the traffic to a steady speed. Travel change: Yes – walk/wheel more
(29) Local resident, (Chiselhampton, Clifton Hampden Road)	Stadhampton 20mph – Support Because the traffic is travelling to fast through the village

	Chiselhampton 20mph – Support Because the traffic is going to fast through the village B480 30mph – Support Keeps the traffic to a slower speed Travel change: Yes – walk/wheel more
(30) Local resident, (Stadhampton, A329)	Stadhampton 20mph – Support Lots of speeding, unsafe for pedestrians, especially vulnerable pedestrians (children and elderly) Chiselhampton 20mph – Support I don't live in chisey but it would also benefit from traffic calming for the same reasons —not enough protection for vulnerable road users B480 30mph – Support Mitigate against higher speeds in the villages themselves Travel change: Yes – walk/wheel more
(31) Local resident, (Stadhampton, B480)	Stadhampton 20mph – Support Current traffic too fast in a residential village setting. Chiselhampton 20mph – Support Current traffic too fast in a residential village setting. B480 30mph – Support Drivers will be able to slow down at a more measured pace from 30mph to 20mph as opposed to 40mph to 20mph. Travel change: No

(32) Local resident, (Stadhampton, Thame Road)	Stadhampton 20mph – Support I live on the main road through Stadhampton and would like to see the traffic responding to a lower speed Chiselhampton 20mph – Support There have been several accidents here in the past B480 30mph – Support Pointless having such a small stretch at 40 Travel change: No
(33) Local resident, (Stadhampton, Milton Road)	Stadhampton 20mph – Support Local residents should take priority The failure of drivers to observe 30 mph limits places our elderly, children, pets and other motorists at risk - 20 mph is the only way Chiselhampton 20mph – Support Local residents should take priority The failure of drivers to observe 30 mph limits places our elderly, children, pets and other motorists at risk - 20 mph is the only way B480 30mph – Support Local residents should take priority The failure of drivers to observe speed limits places our elderly, children, pets and other motorists at risk - reducing speeds between villages is the only way Travel change: Yes – walk/wheel more
(34) Local resident, (Chiselhampton, Cliftonville Hampden Road)	Stadhampton 20mph – No objection I accept the proposals if they are implemented Chiselhampton 20mph – Partially support I support the proposal, but think the 20mph should start at the Camoys entrance on the B4015. By starting at the start of the bungalows I believe that drivers won't immediately slow down and will still be speeding into the village.

	B480 30mph – Support It's only a short expanse of road so doesn't need to be fast between the villages Travel change: No
(35) Local resident, (Stadhampton, Milton Road)	Stadhampton 20mph – No objection As a resident of Stadhampton for over 30 yrs, traffic has increased and the A329 has clocked cars travelling over 70 miles per hour. We live just outside Stadhampton and have have several accidents pulling out and many more near misses. Please make this section 40mph (and do not let it remain at 50mph) between Stadhampton and Little Milton. Chiselhampton 20mph – Support
	Slowing down traffic is beneficial for all living things in the area.
	B480 30mph – No objection Please make the stretch of road between Stadhampton and little milton 40mph. Due to the bends on this road, police cameras have never been used (or that is the reason given) - but all lives are in danger as cars reach 70-80 mph past our homes.
	Travel change: Yes - cycle more
(36) Email response, (unknown)	Support – I would support a 20 mpg speed limit on the A329 through Stadhampton.

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

Christian Mauz
Senior Officer (TRO and Schemes) Network Management
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1ND

Dear Mr Mauz,

STATUTORY CONSULTATION – Ref: CM/12.6.3359/P0269 – Chiselhampton and Stadhampton proposed 20mph Speed Limits

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

We are well aware that the roll-out of the County Council's 20mph is very well advanced, with its conclusion in sight. From the very outset we and other bus operators have consistently raised concerns about the indiscriminate and arbitrary nature of a wide variety of similar schemes. Following some of our initial objections, at their request we had submitted a list to the Council's officers that highlighted those villages where simple substitution of an existing 30mph limit for a 20 mph limit would be likely to pose significant issue for bus operation, either when considered "solus" on its own terms, or, more likely, when the cumulative impacts of multiple such measures were looked at more broadly on a given bus route. After three years remains notable that each of these proposals is being worked up and consulted on based on a single village with no clear systematic regard, through the process, for the cumulative impacts on the reliability, operability or effectiveness of bus services.

To date, notwithstanding many very welcome stated goals to improve public transport, the Council administration has not succeeded in conceiving or bringing forward a single intervention on Oxfordshire's public highway within our extensive operating area, that serves to advantage buses, or more broadly assist in making bus services faster and more reliable. The only new stretch of bus lane is on the A44 at Yarnton, on which we do not operate. Rather, a substantial stretch of existing bus lane is proposed for removal, also north of Oxford on Oxford Road Water Eaton on which we do operate.

The hastily and poorly-designed and evidenced implementation of Low Traffic Neighbourhoods across East Oxford has not led to a longer-term reduction of traffic as the Council insisted it would, such that acute delay and congestion blight most of the City's bus network, especially after 2pm. Most recently the closure in August of Donnington Bridge, with no end date, has served to even more seriously aggravate already serious congestion on Iffley Road.

The National Bus Strategy for England, "Bus Back Better" makes plain the Government's expectation of this, applicable to all transport and highways authorities. The Oxfordshire Bus Service Improvement Plan (BSIP) and its supporting Statutory Enhanced Partnership (EP) has these objectives front and centre.

The Council also has an ambitious policy agenda that seeks to radically reduce carborne trips by 2030, with improved and more attractive bus services being the key to securing the headline policy objective.

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

After all this time, there remains a complete lack of evidence as to how consistently effective the policy is being, having regard to the local context and nature of the roads concerned, nor, in the absence of these new limits being consistently enforceable, what significant benefits have accrued in practice to vulnerable road users, on those stretched of road that perform a major through-movement function, and on which self- enforcement is least likely to occur.

Rather, in April 2024, in the face of wider concerns about the inappropriate blanket imposition of extensive 20mph limits without regard to context and likely effectiveness, Government re-issued a revised LTN 01/13 "Setting Local Speed Limits". This guidance is explicitly intended to set clear expectations as to how a variety of considerations need to be balanced on wider roads, performing a wider function than local access, including as bus routes. Properly discharging the Council's statutory Network Management Duty under Section 16 (1) of the Traffic Management Act 2004 requires that the Council facilitates the safe and efficient movement of all road users. The revised LTN makes plain that properly exercising the Council's Duty requires the Council to have full and proper regard to the Guidance, which at Paragraph 91 explicitly advises that the blanket imposition of 20mph limits is not supportable, and in particular on roads performing a significant movement function and on which self-enforcement is also not credibly expected. It also separately advises that the effects on bus services should be properly considered.

The proposals

The proposals involve a wide range of alterations to speed limits within, between and on the approaches to Chiselhampton and Stadhampton.

Where the 11 bus service route is concerned:

• 600m of the route in Stadhampton is proposed to see the speed limit reduced from 30 mph to 20 mph.

- 420m of the route through the hamlet of Chiselhampton is reduced from 30mph to 20mph
- 650m of the road between the two is reduced from 40 mph to 30mph.

The total length involved is thus about 1700m.

Justification for the proposals

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

These settlements lie at a significant intersection of the B480 broadly running between Oxford and Watlington via Chalgrove, and the A329 which provides a classified road link between both the A4074 and a much wider hinterland to the south, and the M40 at junction 8/8a.

The two main points at which traffic conflicts are both within Stadhampton, and the B480 and A329 flows in effect combine between these points, one of which is a miniroundabout at Thame Road/Milton Road to the north, the other between Thame Road and Newington Road, about 400m to the south, being a priority junction on a sharp bend, where the B480 flow represents the priority movement. The BP petrol filling station and convenience store lies immediate north of this junction.

The village is of significant scale, albeit not large, and extends in a predominantly north-south linear pattern extending along Newington Road some distance to the south of the village core. This pattern was reinforced a few years ago by a further southern extension of the settlement consented at appeal. Apart from the BP garage the primary school is on the far north western edge of the settlement.

We can see that on this basis there is clear justification for the speed limit reduction in Stadhampton. It is obvious that there is a significant amount of pedestrian and cycling traffic within the village, and there may be greater demand to do so – for example to reach the school – with a lower limit. Facilities and amenities are found at a variety of points either side of these busy roads.

At least as relevant, as reflected in Circular 01/13, is the credible level of self-enforcement. The nature and alignment of the A329 especially at The Newington Road junction, makes lower speeds self-enforcing. Furthermore, for much of the day queuing between this point and the mini-roundabout reduces speeds. The built form tightens up suddenly approaching this stretch from the north and frontages close to the kerbline create visual friction.

We therefore offer no objection to the proposals for Stadhampton, though they will directly contribute to further slowing down service 11, in addition to the impact already felt from several other 20mph schemes already implemented, in particular those at Garsington and Chalgrove, elements of each of which we formally objected to.

The contrast with the hamlet of Chiselhampton could not be greater. The place barely could be considered a hamlet, comprising a pub/restaurant and a very small number of domestic properties. The vast majority of these take frontage access from the Clifton Hampden Road, and fewer than 10 from the B480 itself. The hamlet has no street lighting. There are no features that offer a material level of visual friction nor other visual cues to support a 20mph limit being self-enforcing.

Examination of the satellite view confirms strongly the Census data that shows that car ownership is exceptionally high in the hamlet, with multiple vehicles per property. So small a number of properties in an inherently car-dependent location, with no local services except the pub, can hardly be considered to give rise to any material number of active travel journeys. To the degree that they do arise, the hamlet is already covered by a 30mph limit. 20mph limits on this stretch of service 11 cannot reasonably be considered necessary nor effective in performing a safety purpose. The only credible effect is to further slow down buses, for no good reason.

We therefore object to the proposals for Chiselhampton.

There is an additional proposal to reduce the speed limit over 650m between the two villages to 30mph. This stretch is generally aligned with no tight bends, and has reasonable forward viibility. It runs through open countryside. There are no junctions nor private accesses on the stretch of any kind apart from two field accesses. The road is unlit.

It is impossible to see how the proposal will be effective in reducing speeds as self-enforcement will not credibly take place. The proposals will, like so many of the Council's proposals elsewhere, serve principally only to slow down buses even further, on a route that already is greatly burdened by extensive and quite arbitary 20mph sign- only speed limits. This element is also ineffective, disproportionate and unevidenced. It runs counter to the clear statutory requirements binding on the Council under s16 of the Traffic Management Act (2004). We object to the proposals between Chiselhampton and Stadhampton

Anticipated effects of the proposals on the bus service

Oxford Bus Company runs the 11 service following the B480 between Watlington and Oxford, also calling at Garsington. This service has developed over the last twenty or so years from a low-frequency tendered service into a much more regular one, that at one point was partly commercial. It has always been exceedingly marginal. The utility and relevance of the 11, and its predecessors 101 and T1, was significantly boosted when it was made hourly for much of the day, and for the period where this was possible, encouraging growth in patronage was observed.

This is a route where declining bus speeds and increasing congestion related delay and unreliability have had a particularly deleterious effect on both the attractiveness of the service and our ability to operate it efficiently and reliably. After many years of slowly declining bus productivity and reliability, several substantial changes were implemented since 2015, one of which involved truncating the service at Cowley, from where connections can be made to and from frequent services to the city centre and elsewhere

in the Eastern Arc. This was reversed following the application of developer funding to add a bus into the operating cycle. More latterly, further deterioration in traffic conditions led to the withdrawal of many daytime journeys from Watlington, with buses terminating at Chalgrove.

However, the situation has since 2022 become substantially more grave, first with the implementation of the Low Traffic Neighbourhoods in first Temple Cowley and then East Oxford; which has led to an immediate and sustained further collapse in bus speeds on Cowley Road especially after 1400h on weekdays.

This has been followed by the successive implementation of 20mph speed limits on the most extensive basis possible, through multiple villages through which the service operates, including Garsington, Chalgrove and Cuxham. The extent of these limits is as follows:

Garsington 2720mChalgrove 1600mCuxham 700mWatlington 1200m

The extent of the stretches of road involved means that – unlike car borne traffic that routinely defies the limits- buses are legally able to make only extremely sedate progress. Once again, the timetable became inoperable.

From 23rd August 2023 the timetable was revised in agreement with the County Council, restoring a more regular link to Watlington, but at the expense of substantially further opening up service frequencies especially at peak times, and reducing the overall number of round trips. Gaps between afternoon journeys are now between 80 and 100 minutes.

Over a year further on, even this is not strictly speaking sufficient given the extent of 20mph now in place. We have been in discussions with the County Council's lead public transport officer about resolving this. This has included the need to pay for additional driver hours to extend the operating period, as an alternative to reducing the mileage operated, including dropping journeys or truncating more journeys to run only as far as Chalgrove. No agreement has yet been reached with the Council as to how we can operate service 11 in accordance with the expectations of the law.

The proposals add 1600m to the total of 6220m substantially reduced speed limits above: a sum that would then be **close to 8km**, in rural areas beyond Oxford.

The rational conclusion, then, is that the only practical effect of so extensive an imposition of a 20mph limit, with additional reduction of a further stretch of road through open countryside to 30mph, would be needlessly further to slow down buses.

That in turn will work in combination with the widespread imposition of 20mph limits within Oxford, the very severe deterioration of traffic conditions associated with the LTNs within the City, and the intentionally reduced resilience of the network that has been caused both by that and numerous other tactical highways measures on the Iffley Road corridor,

to make service 11 inoperable on even its current timetable.

There is no doubt we will need to further adjust the timetable to extend the scheduled running time at all times of day if the proposals are implemented as published.

The position of Oxford Bus Company and Thames Travel

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

While we have no objection to the proposals for Stadhampton, we consider the Orders in respect of Chiselhampton and between Stadhampton and Chislehampton to be ineffective in achieving the stated aims of the policy, out of conformity with the expectations of LTN01/13, arbitrary, unevidenced and unenforceable. The sole practical outcome that we consider a reasonable person can envisage, would be to further hinder the efficient and reliable operation of service 11.

As such to maintain the current timetable proportionate action will need to be taken. This is likely to involve us further reducing the level of service available, finding ways to recover the delay by ceasing to observe at least one and possibly two of the less well-used existing bus stops in each direction along the route, or finding ways to alter the service very substantially, in a way that allows us to operate another bus in the operating cycle, but at the same time find ways to pay for it through additional revenue. These involve offsetting about an additional £200K/annum operating costs. This perhaps perversely, is likely to make the journey time into Central Oxford even longer for villages on the line of the existing service.

It is very regrettable that we find ourselves having to make a public objection in this way. This situation could easily have been avoided by Council officers through suitable engagement with us in advance.

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

Yours sincerely

Managing Director