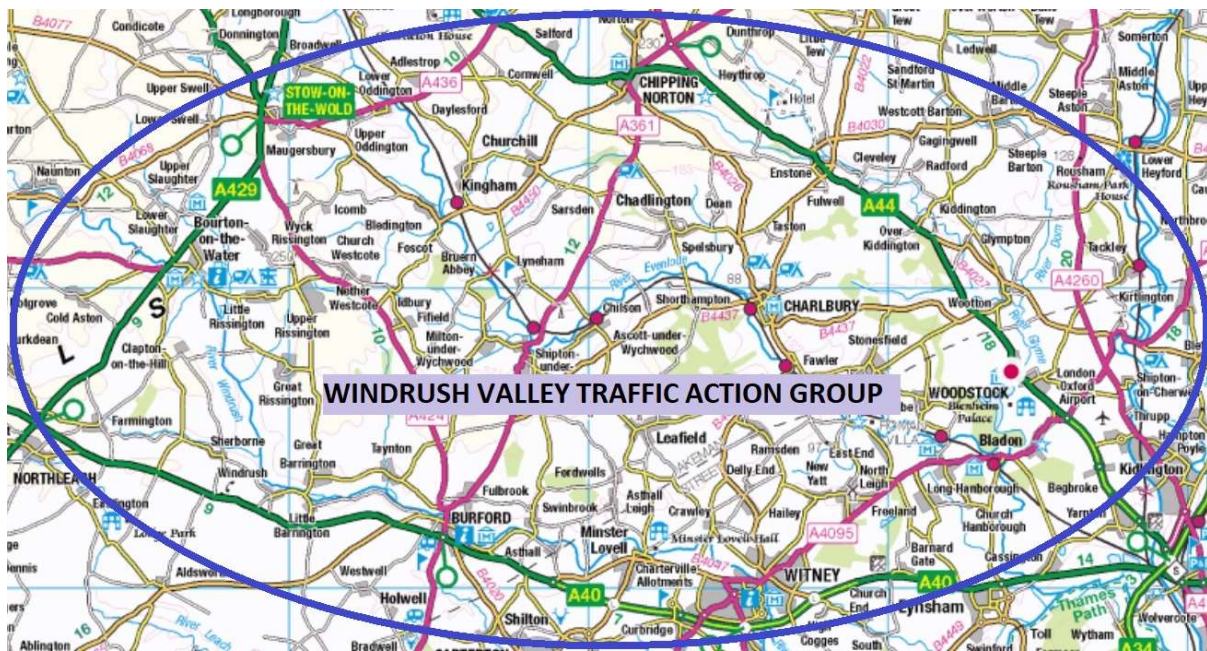


Windrush Valley Traffic Action Group (WiVTAG)

Interim Findings Report to Oxfordshire County Council (OCC)

Burford Bridge 7.5t Experimental Traffic Regulation Order

Windrush Valley Traffic Action Group (WiVTAG) currently includes 15 Parish and Town Councils, 1 district council, and a growing number of farms and businesses in Oxfordshire and Gloucestershire. We represent the interests of local communities and businesses who have been affected by the displacement of HGV traffic due to the Burford TRO. This Action Group incorporates an area of over 100 square miles within a 30-mile radius of Burford:



WiVTAG challenges and seeks to constructively support both OCC and Gloucestershire County Council (GCC) to recognise the serious regional impact of this experimental weight limit. We urge OCC to revoke the Burford 7.5t restriction and strengthen the application of relevant policies and strategies in their Local Transport Plan.

Context and Research

WiVTAG's research and data collation has encompassed local communities, farming, and haulage and transport companies in order to establish a full and objective understanding of the current situation and its commercial, environmental, and financial impact. This supports our view that any national or regional freight management solution must allow a realistic, commercially viable flow of essential produce, and supplies to sustain demand within environmental constraints.

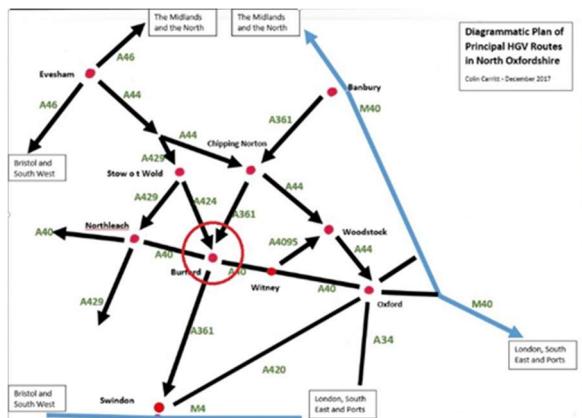
This interim report aims to highlight key, disturbing findings and data that will increasingly inform the full appeal document, that we will submit to the Council's Cabinet and our Members of Parliament in late June 2021. Recognising that cooperation and compromise will be critical, WiVTAG is confident that you will wish to be apprised of the following findings.

Overall detrimental effect of the scheme

The estimated 400-600 HGVs transiting through Burford daily, confronted by the experimental TRO weight limit since August 2020, have been forced to seek alternative routes.

The long-haul routes through Burford were the:

- **A361**, which carried freight movement between Daventry, Banbury, M40, Chipping Norton, Burford, and Swindon M4.
- **A424**, which feeds into the A361 at Burford, and is a substantial freight route for HGVs from the Evesham distribution centres to London and the south-east ports.

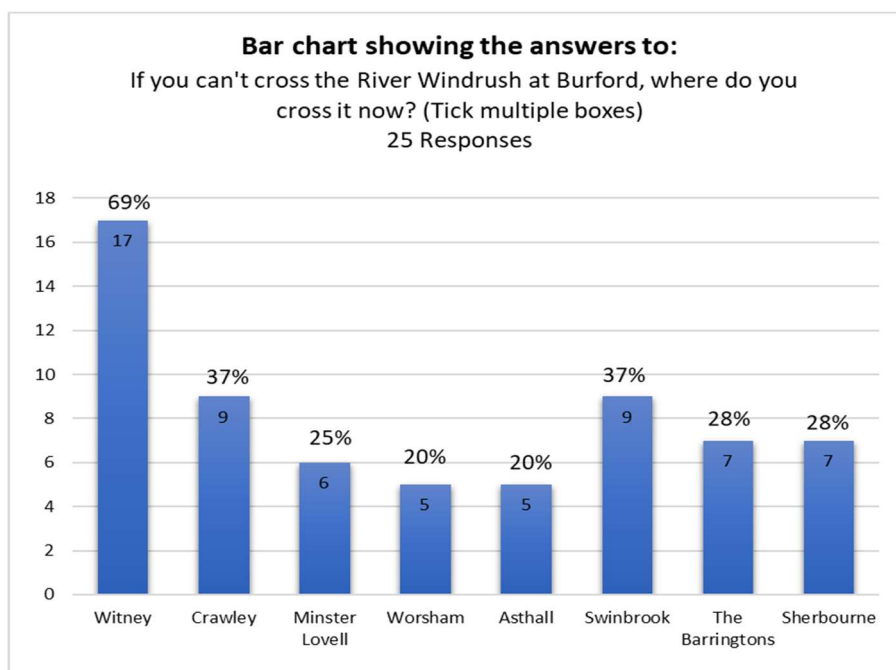


The restriction in Burford has:

- displaced almost all the Evesham traffic (fruit and industrial) to the A44 through Moreton-in-Marsh/Chipping Norton/Woodstock.
- offered alternative routes that are unworkable, time/cost consuming or indeed inefficient. These are the westbound A40 to Northleach route, with an impossibly tight roundabout, and the eastbound A40 to Oxford route, with frequently heavy congestion.
- caused drivers of international haulage and transport operators, often using Satnav, to select local alternatives that are often on very unsuitable roads.

Local company HGVs, with contracts in the farming, waste, building, or energy sectors were dependent on the Burford bridge for access to regional businesses and sites. Most of these businesses are not eligible for exemption permits in the scheme operated by Burford TC. The situation leaves them no option but to use the narrow lanes through neighbouring Witney, Minster Lovell, Crawley, Hailey, Leafield, Swinbrook, and the Barringtons to cross the River Windrush.

As part of our daily increasing contact with local and regional haulage and transport companies, WiVTAG has issued a short questionnaire. The data collated thus far reveal that some HGV drivers either contravene existing TROs or use minor roads in small villages to cross the River Windrush.





Local Farming Industry. WiVTAG’s ongoing liaison with local farmers has exposed a substantial degree of concern, commercial impact, effective ‘isolation’ and operating challenges to their businesses. These large or contract farming estates are dependent on heavy haulage for supplies and, crucially, the movement of livestock, grain, straw, hay, and wood to clients or regional/national and international markets. The economics of scale and cost

dictate that all such movements are by three or more axle HGVs weighing well above 7.5t.

Crucial to our findings is that Burford’s agreement to offer ‘local permits’ ignores the critical transport requirements of modern agricultural business. There are a number of regular **national** ‘loops’ that have effectively been broken by the weight restriction:

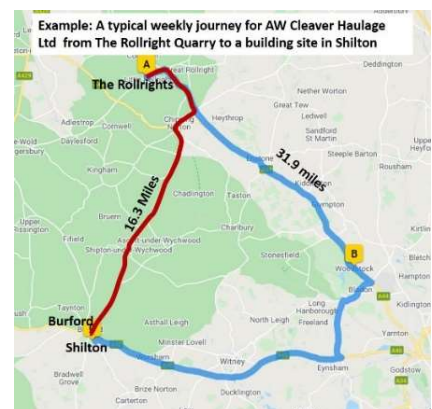
From	To	Load
Southampton/Avonmouth/Carmarthen	Ducklington	Aggregate
Ducklington/Gill Mill	Burford/Charlbury	Stone, Build materials
Burford/Charlbury	Southampton/Avonmouth/Carmarthen	Grain & Straw

Operation of national ‘loops’

- Our local farmers join this ‘loop’ or national circuit as soon as they place/request a shipment
- The hauliers (many of whom run over 100 vehicles) allocate contracts to the fleet; permits for single vehicles (registration numbers) would be inappropriate or impossible to control.
- If individual hauliers cannot fulfil a contract due to availability, the job is sub-contracted through a network of driver-owned vehicles.

Burford TC do not issue permits to entire fleets of HGVs, and local farmers cannot apply for a single vehicle license as even the haulage contractor will not know the registration number until a maximum of 48hrs before delivery/collection. The likely consequence is that an HGV driver (who has possibly/probably never run this circuit or is a non-English speaking driver using Satnav) learns about the weight limit on arriving at Burford roundabout and, perhaps in desperation to fulfil the contract, will take or try any alternative route, even if that is breaking the law.

Haulage and Transport operators Local business (retail, building and construction, FMCG) is dependent on local, national, and international transport. Burford and its surrounding communities expect a dependable level of essential services (fuel, aggregate, sewage waste, skips) which are supplied most cost-effectively and efficiently by HGVs. The current situation is enforcing detours that are at best inefficient and (at an average 8mpg) most certainly in direct contradiction to any County AQMA or regional net zero environmental initiatives. See the example of route taken by AW Cleaver Haulage, requiring a journey of 31.9m (compared to a previous 16.3m) for a current weekly local delivery from The Rollrights to Shilton.



We take this opportunity to share just one of a variety of reports from a regional haulage Company, supporting our local agriculture:

We are a hay and straw business that bale straw, around Lechlade and Witney and we currently bale around 4000 acres, which is about 6000 ton and we cart this all back to our yard at Stow to store, this is approximately 200 loads and we are at present having to go to Northleach roundabout to get back, which is putting 20 extra miles on per trip. (4000 miles over the summer harvest) how can this be a green way of doing things and be better for the roads?

Gaden Logistics Ltd – Upper Oddington

Criteria for performance measurements

OCC’s proposed method of measuring the success of the Burford restriction is to monitor traffic at six key points in the county and to compare the number of HGVs before and after the scheme came into operation. A reduction of more than 50% in Burford and an increase of no more than 50% elsewhere is seen as a success. However, the country has been living with radically different patterns of movement under Covid 19 restrictions. Consequently, it will prove exceedingly difficult to distinguish changes due to the Burford restriction from other much larger national impacts on traffic.

OCC has commissioned additional traffic counts, the results of which have not yet been shared. While WiVTAG is gathering live data where and whenever possible, we would welcome inclusion of HGV counts in the smaller communities that have been affected by the closure of the A361. These data would add to the traffic counts in the Burford scheme that are restricted to main (A Road) freight routes through Oxfordshire and do not include roads in local parishes.

In parallel and further to our serious concern about the apparent lack of a regional approach, WiVTAG has noted the absence of any similar or coordinated traffic sensor activity in Burford’s neighbouring Gloucestershire villages.

Contradiction of Council Policy Commitments

In the first instance, WiVTAG sought direction, clarification, and justification for OCC’s actions in the County’s own Local Transport Plan (LPT4) and Freight Strategy documents. We were surprised to find the following policy statements that if applied by OCC, would have justified rejection, or at very least serious questioning of the TRO application submitted by Burford:

- **OCC Local Transport Plan**

- **Policy 05** Oxfordshire County Council will classify and number the roads in its control to direct traffic, particularly lorry traffic, onto the most suitable roads as far as is practicable.
- **Policy 24** Oxfordshire County Council will seek to avoid negative environmental impacts of transport and where possible provide environmental improvements, particularly in Areas of Outstanding Natural Beauty, Conservation Areas, and other areas of high environmental importance.

Proposed policy focus areas

In support of the key themes, we have identified the proposed policy focus we believe are required to achieve these outcomes. These are outlined below and include examples of what might be included under each area in the detailed LTCP.

<p>Active and healthy travel</p> <ul style="list-style-type: none"> Greenways Local Cycling and Walking Infrastructure Plans Interchange with Public Transport Strategic Active Travel Network Transport user hierarchy 	<p>Road safety</p> <ul style="list-style-type: none"> Safety improvements Equestrians Motorcycles 	<p>Digital connectivity</p> <ul style="list-style-type: none"> Gigabit expansion Home working
<p>Public transport</p> <ul style="list-style-type: none"> Demand Responsive Transport Bus strategy Rail Park and Ride Mobility hubs 	<p>Healthy place shaping</p> <ul style="list-style-type: none"> Low Traffic Neighbourhoods School Streets Healthy Streets Approach Guidance and standards for new development 	<p>Regional connectivity</p> <ul style="list-style-type: none"> Cross boundary transport network England's Economic Heartland / OxCam Arc
<p>Air quality</p> <ul style="list-style-type: none"> Green Infrastructure Clean Air / Zero Emission Zones Zero emission vehicles 	<p>Innovation</p> <ul style="list-style-type: none"> Living Lab Micromobility Shared mobility 	<p>Local connectivity</p> <ul style="list-style-type: none"> Transport corridors Rural transport Area transport strategies Connecting Oxford
	<p>Freight</p> <ul style="list-style-type: none"> Road and rail freight E-cargo bikes Freight consolidation 	<p>Network and congestion management</p> <ul style="list-style-type: none"> Network Management Policy Demand management Highways Asset Management Plan Parking management

Questions:

Do the key themes and policy focus areas identified reflect the wider priorities for Oxfordshire and the public and stakeholder engagement we have undertaken to date? If not, what is missing or needs changing?

One the key areas identified as needing careful consideration based on the engagement feedback is the future of Park and Ride? How do you think we should develop park and rides in order to support the vision and key themes?

- **Policy 29** Oxfordshire County Council will work with district and city councils to develop and implement affordable transport interventions to support Air Quality Action Plans, giving priority to measures which also contribute to other transport objectives.
- **Oxfordshire Freight Strategy** Our freight strategy aims to improve the transport of freight within and through Oxfordshire, ensuring it is made using suitable routes and with minimal environmental impact, while reducing the impact of Heavy Goods Vehicles (HGVs) on communities. Where HGVs cause environmental damage, we will retain and, where resources allow, consider new environmental weight limits. These prohibit HGV through traffic but allow local access. Structural weight limits will be applied to protect the county's bridges where necessary. We will also seek to minimise environmental damage from HGVs using Routing Agreements, Construction Logistics Plans and Delivery and Servicing Plans, as part of the development control process.
- **Department for Transport (DfT) Direction** DfT has published the estimated external cost per lorry mile of using different categories of road. These vary from 82 pence for A class roads to 235 pence for other (lower classification) roads. This reflects various environmental costs, but the critical factor is infrastructure, that is to say road repairs and maintenance, where the costs per lorry mile are 7 pence for motorways, 24 pence for A roads and 171 pence for other roads. This illustrates the economic and environmental benefits of keeping lorries on the strategic road network as far as possible.

AQMA (Air Quality Management)

WIVTAG, representing a largely rural resident community, shares West Oxfordshire's emphasis on AQMA. Approval of the Burford TRO directly contradicted the stated policy aims of OCC as set out in LTP4 (policy 29). Indeed, Burford is at 50% of the levels recorded in Witney and Chipping Norton (areas that breach Air Quality levels) to where much of the HGV traffic has been diverted:

Burford Decrease (2016-2019)

Site ID	Site Location	Site Type	No of valid results (total number) for 2018 ⁽¹⁾	Valid Data Capture 2018 (%) ⁽²⁾	NO ₂ Annual Mean Concentration (µg/m ³) ⁽³⁾				
					2015	2016	2017	2018	2019
NAS18	CN Co location	R	12 (12)	100	36.5	40.5	31.0	33.2	30.4
NAS19	CN Co location	R	12 (12)	100	32.5	38.2	30.6	31.7	29.5
NAS20	CN Co location	R	12 (12)	100	32.3	33.9	32.3	30.2	27.2
NAS18,19,20	TRIPLE.MEAN	R	12 (12)	100	33.7	37.5	31.3	31.7	29.0
NAS21	7 Horsefair	R	12 (12)	100	21.9	23.8	20.5	21.7	19.8
NAS22	Horsefair (opp 7)	R	11 (11)	91.7	53.6	53.8	48.1	47.3	43.9
NAS23	Lower High St, Burford	R	11 (12)	91.7	33.2	36	31.9	29.0	28.2
NAS24	93 High Street , Burford	R	12 (12)	100	29.8	29.0	22.5	23.2	21

Witney (above AQMA levels)

Site ID	Site location	Site Type	No of valid results (total number) for 2019 ⁽¹⁾	Valid Data Capture 2019 (%) ⁽²⁾	NO ₂ Annual Mean Concentration (µg/m ³) ⁽³⁾				
					2015	2016	2017	2018	2019
NAS1	25 Bridge Street	R	12 (12)	100	51.9	55.7	49.9	48.2	44.8
NAS2	10 Bridge Street	R	12 (12)	100	-	-	40.6	40.5	37.1
NAS3	20 Bridge Street	R	12 (12)	100	42.6	51.5	43.9	41.8	41.9
NAS4	Mill Street	R	12 (12)	100	35.5	33.8	34.4	31.9	33.9

Community attitudes to HGVs



Damage to local Rural Communities Damage to Burford High Street was one justification for the implementation of the weight limit. This takes no account of the resulting damage that is now being experienced in the neighbouring Oxfordshire and Gloucestershire villages. Verges, footpaths, bridges, and culverts are being damaged, while pedestrians, heavy commercial and car traffic attempt to find space on the narrow lanes.

Burford Town Council The WiVTAG community accepts completely that Burford Town Council has acted in the best interests of its resident community and historic property. At the same time, mindful of the experimental nature of the current TRO, we were most concerned to understand the attitude of the Town's Mayor, which at best reflects a lack of understanding of the situation and indeed degree of damage being caused:

There is no reason why smaller communities should be disadvantaged. The solution is simple. The Leafields and the Crawleys should apply for their own weight limit protection, as we did. Asthall, Charlbury, the Barringtons and Minster Lovell all have done so. Indeed, it is the Charlbury limit which has given Leafield its problems rather than us. So go to it, Leafield and Crawley, we will give you all the help you need. Here endeth the lesson!

John White – Mayor (Burford 'Bridge' March 2020)

Such an opinion does not address, nor will it resolve, the problems with essential local and regional traffic flow. You may be in no doubt of WiVTAG's responsible, objective, and constructive approach, that we will present in a more detailed appeal to Oxfordshire County Council in June 2021.

WiVTAG

Windrush Valley Traffic Action Group

Committee Members:

Deborah Triff – Leafield Resident

Gina Pearce – Chair of Leafield Parish Council

Graham Knaggs – Chair of Hailey Parish Council

Colin Carritt – Woodstock Resident

Mark McCappin – Crawley Parish Councillor

Jan de Haldevang – Chair of Barrington Parish Council

Jonathan Stowell – Minster Lovell Parish Councillor

Lisa Harrop – Swinbrook Parish Clerk