

Traffic Analysis Report

EXECUTIVE SUMMARY

- Very notably, in Section 14(1) of the *Parliamentary Research Briefing (Standard Note: SN6013*, last updated: 17 November 2014) drawing on the *Road Traffic Regulation Act 1984*, it states quite clearly: “this is not a simple thing to make an Order and can often be expensive. A local authority is unlikely to make a TRO **unless it has a significant problem and substantial local support**”;
- Oxford Council has a majority of residents who are *against* the road closure yet it has refused to listen. Likewise, it has failed to provide evidence of any “significant problem” to justify closure because it has no evidence, yet it continued on its belligerent single-minded path to close Walton Street;
- There is no relevant traffic monitoring system or resulting data for the Jericho/Walton St wider area;
- There is no scientific evidence or data to justify or warrant the south-end road closure of Walton St;
- None of the ATCs appear in the vicinity of the wider Jericho/Walton St area. They therefore bear no direct relevance to traffic movement through Walton St or its capillary roads;
- Likewise, the “manual counting” data of 28 January 2020 and the “traffic modelling” data of 23rd to 30th January 2020 is unusable in any scientific manner because there is no “before data” (“base-line data”), giving no car usage under “normal” conditions, prior to the road closure. This means it is not possible to say whether this manual count data taken on 28 January 2020 (“number of cars”) for these three streets is “normal” or higher. These numbers then became higher with the closure of the south end of Walton St forcing capillary roads to become the key exit-entry roads into Jericho/Walton St – forced down these one-way, narrow streets, turning these into high pressure-points;
- Therefore, any data post-closure only captures a snapshot of highly chaotic traffic movement and does not – cannot – form the basis for any sensible analysis. It simply records highly irregular traffic responding to confusion caused by the simultaneously chaotic road signs;
- Regarding the “road tube counting” conducted between 23 January and 11 February 2020, this data is scientifically useless because a) there was no “before data” (base-line data) to compare it to; and b) these “tube measurements” cannot prove “normal” road usage, because they reflect only chaotic traffic movement after the closure of Walton St, *and* the subsequent chaotic road signs activity by Council. These data are just too erratic and unreliable;
- The chaotic temporary roads signs have clearly been implemented by a Council team entirely unfamiliar with the local area, and the roads themselves; and with little engagement with the community...knee-jerk reactions from behind office desks. More permanent signs appearing have the same problem. These signs have introduced immense confusion and chaotic vehicular patterns, further exacerbating the already ill-thought road closure;
- There is simply no strong reliable traffic data to work with – and most certainly not in an informed scientific manner that can possibly back up the above Council “reasons” for road closure: there is no data to identify any “lack of safety”; the data does not identify any evidence for “adverse environmental impact”; the air quality and traffic data do not provide any scientific evidence of poor air quality, unsafe environments or rat-running; neither does the data provide any scientific evidence to justify how the road closure would “improve the environment”; nor any survey of “local residents and businesses” to understand their many different uses of the wider area and its roads, and their many different needs;
- The act of closing Walton Street has triggered innumerable negative impacts upon local residents and businesses, and these negative impacts are not being measured properly;

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- The road closure has become nothing more than an instrument of abuse – of local authority “state-violence” by Councillors enforcing their power upon a community, which has the aggressive and belligerent effect of bulldozing over a community’s wishes and needs, and that community’s better understanding of its own environment and infrastructure;
- This is also a blatant abuse of “democracy” and its “due process” particularly in the meaning and application of the term “consultation” – the ETRO process and consultation has not enabled a democratic inclusion of the local community;
- The closure of Walton Street has achieved nothing other than considerable expense (at taxpayers’ cost) and an out-and-out insult to the local population who are voting constituents and taxpayers;
- Council has been influenced by opinions and “influencers” that bear no relation to the majority (democratic) voices of the area under question, and influenced by imagined assumptions and hidden agendas. The original (first) “consultation” lists “key stakeholders”, of whom none are appropriate representatives of local residents and local traders. Instead, these “stakeholders” are not wholly resident or operating businesses within the local area;
- In direct opposition to Council’s “strategic vision” online statement, in the closure of Walton St, Council has: failed to engage directly with residents; failed to consider “older and disabled people”; failed to “care for those in greatest need”; failed to consider road closure negative impacts on community safety and health; failed to “protect the local environment” by increasing traffic and pollution; failed to “support a thriving local economy”; failed to “improve transport links”; and done nothing to “create jobs and homes for the future”;
- In direct opposition to Council’s “Connecting Oxford” statement, in the closure of Walton St, Council has **dis-connected** the community and **dis-connected** the local traders’ economic hub. Oxford Council has demonstrated with great clarity that it is **divorced** from reality;
- Council has triggered costs in the road closure, instead of allocating those costs more wisely to wider surveying and traffic calming measures that are in sync with the life and economy (the socio-economic ecology) of the Jericho/Walton St area;
- It has become very clear that Councillor Constance is likely intending – and has pre-determined – the ETRO on Walton St to be turned into a permanent order. This is a hardline, undemocratic and aggressive approach to any community;
- Council has widely and consistently communicated a very brutal approach to eliminating cars on roads, yet it has done nothing whatsoever to help Jericho drivers switch to electric vehicles (a massive financial undertaking for a majority of drivers); likewise it has done nothing to introduce electric vehicle charging points in Jericho to further assist the switch; similarly it has done nothing to increase bicycle parking/locking points to stop cyclists locking against residential properties and street signs...**Council has done nothing at all except brutally attack** a community’s drivers and create new traffic and pollution shockwaves through the area;
- What *is* needed is a full comprehensive survey across the whole area of Walton St and its capillary roads. This survey would need to include stable long-term traffic measuring, and the surveying of different uses and needs of the whole-area-roads, such as residents, local businesses and their deliveries and visitors. Without such a comprehensive survey, it is impossible to base any correct decision on what the appropriate traffic calming measures could be and where;
- A full comprehensive survey and “consultation” in its true meaning would enable a community-led and community-agreed democratic process to determine the correct range of traffic calming measures for implementation across the whole area, thereby enabling the correct traffic calming and cleaner environment effects on local roads that have considerably different characteristics to each other.

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1. Traffic Data

1.1 This is what Oxfordshire County Council says on its “Transport Monitoring” webpage:¹

How and why we survey traffic, and information about statistics and trends.

We carry out transport surveys to support the development of:

- the Local Transport Plan
- area transport strategies
- traffic engineering
- road safety initiatives

Most of the traffic flow data collected is produced from automatic traffic counts or manual classified counts:

Automatic Traffic Counters

There are 462 Automatic Traffic Counters (ATC) sites located across the county. These predominately cover the major A and B road network along with some more heavily trafficked unclassified roads (for further information on the M40, A34 and A43 please refer to Highways England). Of these ATC, 56% continuously count traffic flows while the remaining 44% are used to gather 1 to 2 weeks' worth of data per year.

The ATC data “Annual Average Daily Traffic” from 2014-2018 is provided on this Excel sheet

<http://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport/AnnualAverageDailyTrafficAADT2014-18.xlsx>

This online map also provides “search annual average daily traffic flow”

<https://oxfordshire.maps.arcgis.com/apps/webappviewer/index.html?id=afe8bef2e7514f91bb1bf6ec034fb69b>

Note: See analysis of this data in next section 1.2.

Manual Classified Counts

Manual Classified Counts (MCC) are carried out on an adhoc basis either using enumerators or video cameras and are normally used to gather 12 hour link/turning counts as well as pedestrian and cycle survey data. Radars, Tube Surveys and ANPR cameras are also used on an adhoc basis and can provide speed, journey time, class and origin and destination data.

It provides basic information from 2014-18 on this Excel sheet

<http://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport/ListofAllMCCTrafficSurveys2014-18.xlsx>

Note: Despite requests to the Council for this raw data, they have not provided it.

Cycle Monitoring

We carry out a series of automatic and manual cycle counts across the county to monitor the proportion of trips made by bicycle. Manual cycle counts are picked up in the above MCC survey list.

Cycle movements can be obtained from the following survey types pedestrian/cycle, link count and junction count. It provides “automatic cycle counts” from 2014-2018 on this Excel sheet

<http://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport/AutomaticCycleCounts2014-18.xlsx>

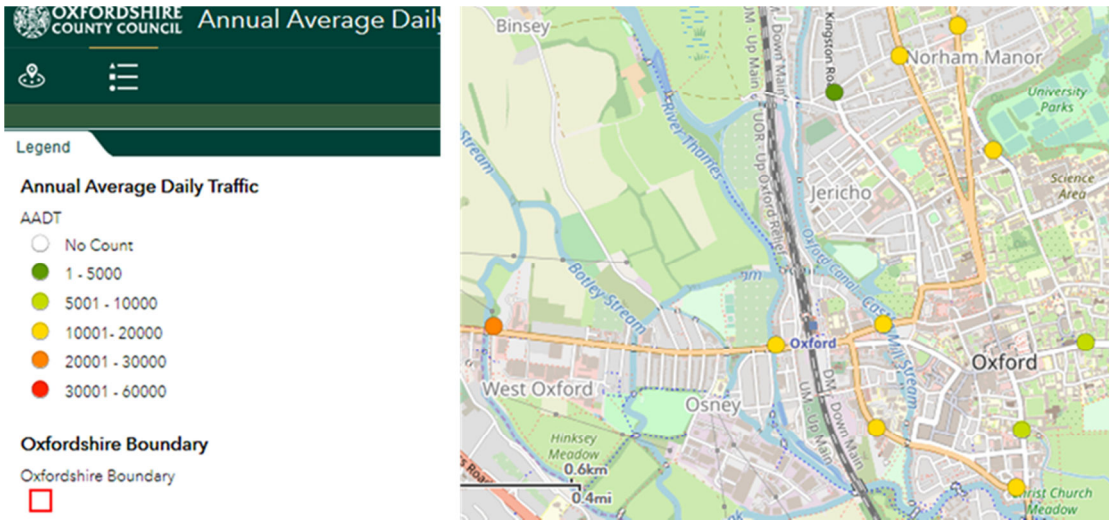
Conclusion: There is **no relevant traffic monitoring system or resulting data** for the Jericho/Walton St wider area. These links lead to no scientific evidence or data to warrant any road closure, as the following analyses prove.

1.2 Analysing the Automatic Traffic Counters “Annual Average Daily Traffic 2014-2018” data

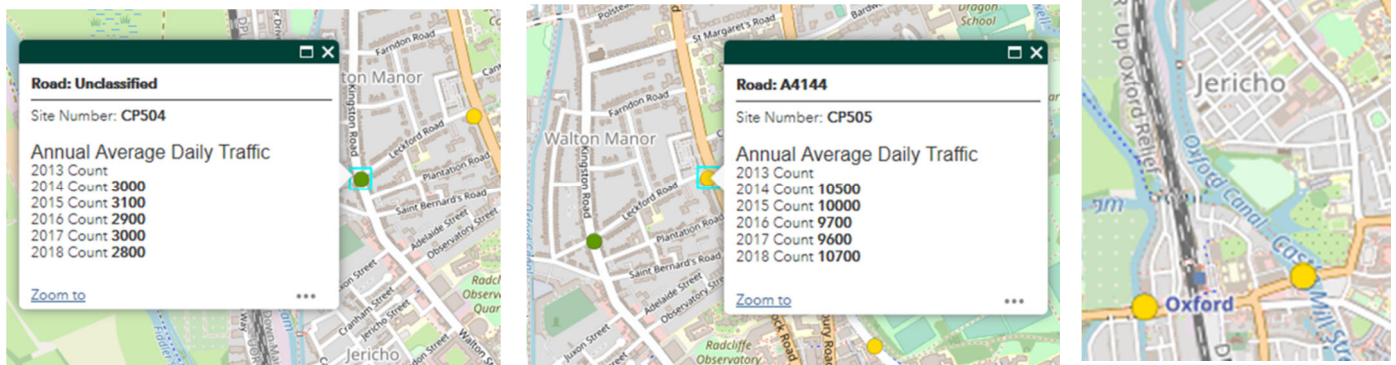
¹ <https://www.oxfordshire.gov.uk/residents/roads-and-transport/traffic/traffic-calming>

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Using the online map, we find **only four ATC ‘site numbers’** that are vaguely relevant to Jericho/Walton St
<https://oxfordshire.maps.arcgis.com/apps/webappviewer/index.html?id=afe8bef2e7514f91bb1bf6ec034f69b>

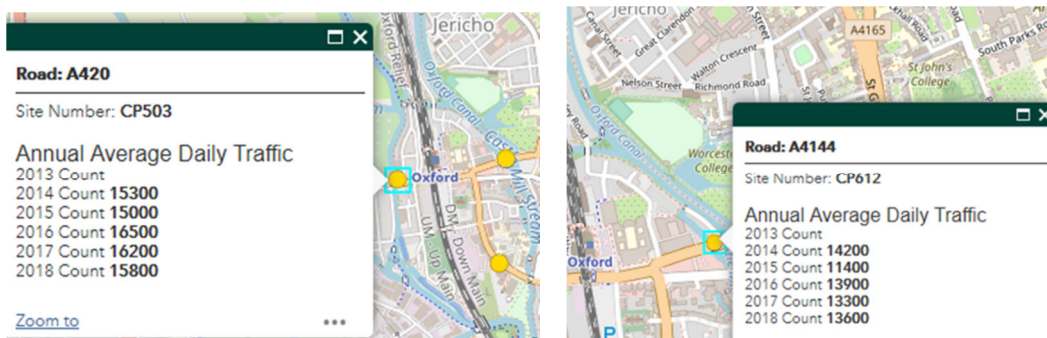


CP504 is Oxford Kingston Rd South of Leckford Rd
 CP505 is A4144 Oxford Woodstock Rd South of Leckford Rd
 CP612 is Oxford Hythe Bridge Street
 CP503 is A420 Oxford Osney Bridge



This data from the Excel sheet is (<http://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport/AnnualAverageDailyTrafficAADT2014-18.xlsx>) (X & Y are the map coordinates):

Site number	Road name	Location title	AADT 2014	AADT 2015	AADT 2016	AADT 2017	AADT 2018	X	Y
CP503	A420	A420 OXFORD OSNEY BRIDGE	15300	15000	16500	16200	15800	450332	206245
CP612	A4144	Oxford Hythe Bridge Street	14200	11400	13900	13300	13600	450798	206343
CP504	Unclassified	Oxford Kingston Rd South of Leckford Rd	3000	3100	2900	3000	2800	450573	207356
CP505	A4144	A4144 Oxford Woodstock Rd South of Leckford Rd	10500	10000	9700	9600	10700	450855	207516



The two nearest ATCs

to the Walton/Beaumont St junction are CP612 at Hythe Bridge Street and CP503 at Osney Bridge. This data provides absolutely no information whatsoever on the number of vehicles going in either

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direction of Walton St. It also provides no data whatsoever on the number of vehicles in either direction of any of the capillary roads/junctions of Walton St.

There is only one vaguely relevant ATC on the “CP504 Kingston/Leckford Rd” junction, but this quite some distance from the northern end of Walton St. This ATC data indicates that a maximum of 3000 vehicles appearing at this ATC point. Being too far from the key roads of Jericho and Walton St, and without any comprehensive data for Jericho and Walton St, it therefore bears no direct relevance.

Conclusion: There is absolutely nothing in any of the data from Automatic Traffic Counters (ATCs) to provide any relevance to the Jericho/Walton Street area and wider area of Walton Street’s capillary roads. None of the ATCs appear in the vicinity of the wider Jericho/Walton St area. **It therefore does not constitute any scientifically reliable evidence to make any assumptions or “big decisions” about traffic in the area.**

Therefore, there is no data to inform or determine any decision to close Walton St. This absence of data provides no illuminating information on “rat-running” down Walton St, let alone residential or stakeholder vehicular use of the street. **The decision to close Walton Street is based on zero information.** Furthermore, the act of closing Walton Street has triggered innumerable negative impacts upon local residents and businesses, and **these negative impacts are not being measured properly** (relying only on residents and traders acting as citizen scientists to record those negative impacts).

This is a blatant abuse of “democracy” that explicitly ignores and excludes a local population. It is also an abuse of “power” by a few councillors appearing to make decisions on their own. It is also an abuse of the meaning and application of the term “consultation”. The closure of Walton Street has achieved nothing other than considerable expense (at taxpayers’ cost) and an out-and-out insult to the local population.

What is needed is a full comprehensive survey across the whole area of Walton St and its capillary roads. This survey would need to include stable long-term traffic measuring, and the surveying of different uses and needs of the whole-area-roads, such as residents, local businesses and their deliveries and visitors. **Without such a comprehensive survey, it is impossible to base any correct decision on what the appropriate traffic calming measures could be and where.**

Note regarding all the types of available traffic data for the area: there are different ways to analyse the traffic data (i.e. from different “angles”). Whichever way we look at the data, it consistently belies the fact that if there is no base-line data and no proper survey of several interconnecting aspects, then the existing data – however one analyses it – is pretty much useless.

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1.3 Analysing the “road tube counting” 23 January to 11 February 2020 (see below raw data)

For 20 days, between 23 January and 11 February 2020, Council laid ‘road tubes’ to measure traffic across several streets:

St Bernard’s Road, Leckford Road, Observatory Street, St Margaret’s Road, Walton Street, Little Clarendon Street, Farndon Road and Kingston Road (I ignore the Beaumont Street one as irrelevant)

Council provided 15 Excel spreadsheets containing this data. I select out a certain set of data for this report (see the data below) – as total vehicles², over 24 hour counts for each of the 20 days.

A lowest-highest number of total vehicles across the 20 days:

- St Bernard’s Road 1682-2832 no of cars (*one way to Woodstock Rd*)
- Leckford Rd 864-1491 for (west to east) and 696-1176 (east to west)
- St Margaret’s Rd 213-1779 (west to east) and 100-864 (east to west)
- Observatory St 838-1895 (*one way into Walton St*)
- Walton St 588-1155 (north to south) and 768-1507 (south to north)
- Little Clarendon St 195-688 (west to east) and 1279-2178 (east to west)*
- Farndon Rd 326-633 (south to north) and 210-456 (north to south)
- Kingston Rd 950-1887 (south to north) and 477-1147 (north to south)

**Note that Little Clarendon St is one-way to car-vehicles (east to west, to enter Walton St) and two-way to bikes*

This data is, however, useless. Firstly, there is no “before data” to compare it to (these “tube measurements” prove nothing in terms of “normal” road usage). Secondly, this data only reflects chaotic traffic movement due to the closure of Walton St (complicated further by the chaotic temporary road signs introduced in knee-jerk reactions by Council).

1.4 Analysing the “traffic modelling” 23/01/2020 – 30/01/2020

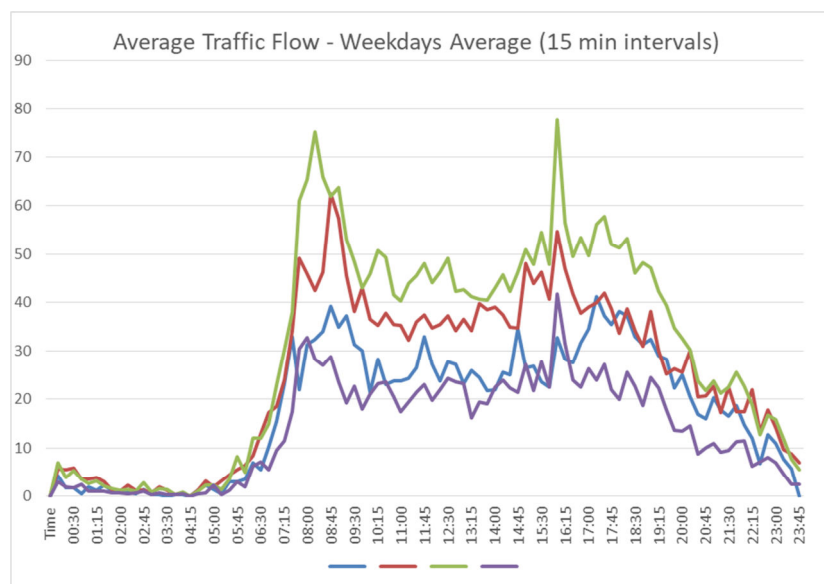
Traffic modelling was undertaken by the Council between the dates of 23rd January 2020 and 30th January 2020. The purpose of this survey was to establish traffic flows and traffic volumes within the Walton Street, St Bernard’s Road area. The cost for the traffic survey was £1200 + VAT.

The results of the February 2020 survey are as follows:

This is a summary document that has been created from base (background) data.

COMPARISON OF TRAFFIC FLOWS ON ST BERNARD’S ROAD

(*results averaged from the days Weds 29th Jan, Thurs 30th Jan, Tues 4th Feb, Weds 5th Feb)



² “total vehicles” here includes all vehicular types including bikes and motorbikes.

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St Bernard's Road is one way (Eastbound) – Throughout the course of a weekday 24hour period, traffic volumes (including cycles) on St Bernard's Road is;

- 35% greater than traffic flows on Observatory Street (Westbound only)
- 76% greater than eastbound only traffic flows on Leckford Road

Traffic flows however are approximately 19% lower than the combined 2-way flows on Leckford Road

PEAK HOUR FLOWS

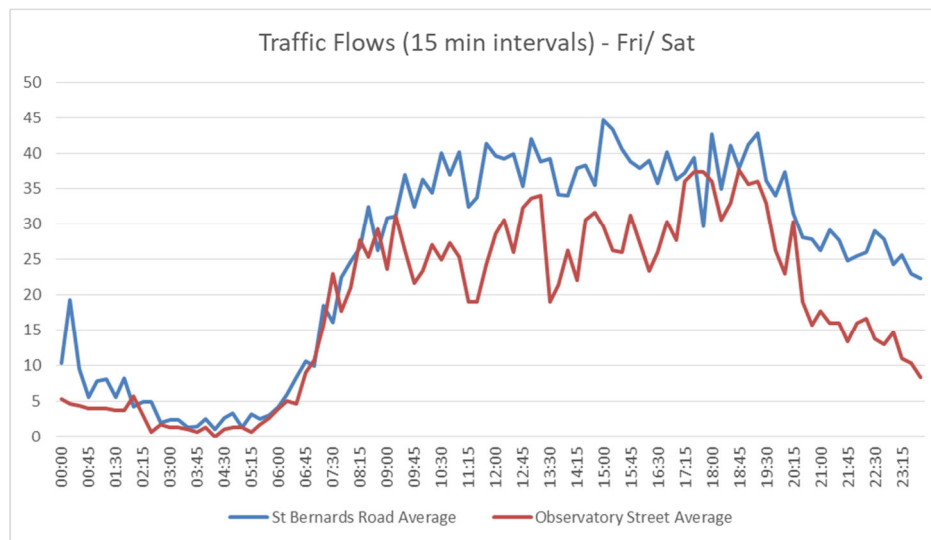
(*results averaged from the days Weds 29th Jan, Thurs 30th Jan, Tues 4th Feb, Weds 5th Feb)

Average peak hour flows are also notably greater on St Bernard's Road when compared to other surrounding streets (Combined 2-way flow on Leckford Road is again greater).

Hour Starting	ROAD		
	St Bernard's Road	Observatory Street	Leckford Road (E/B Only)
07:30	172	118	109
14:30	162	114	93
16:30	158	136	97

LATE EVENING TRAFFIC FLOWS

(*results averaged from the days Fri 24th Jan, Fri 31st Jan, Sat, 1st Feb)

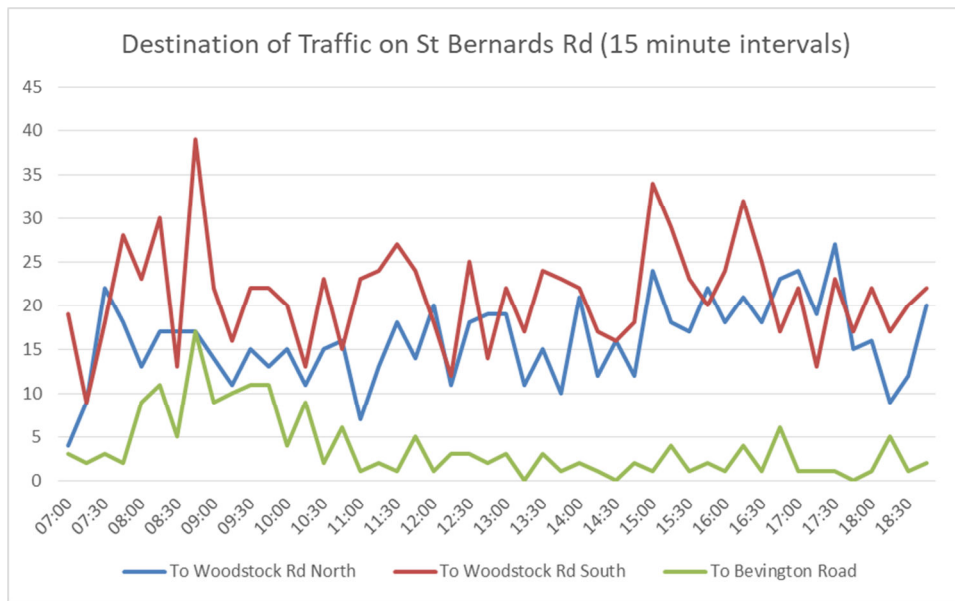


- On Friday and Saturdays, traffic flows in late evening whilst not insignificant are still lower than at other points of the day.
- In the hour starting 22:30, there was an average of 106 vehicles passing along St Bernard's Road.

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DESTINATION OF TRAFFIC ON ST BERNARD'S ROAD

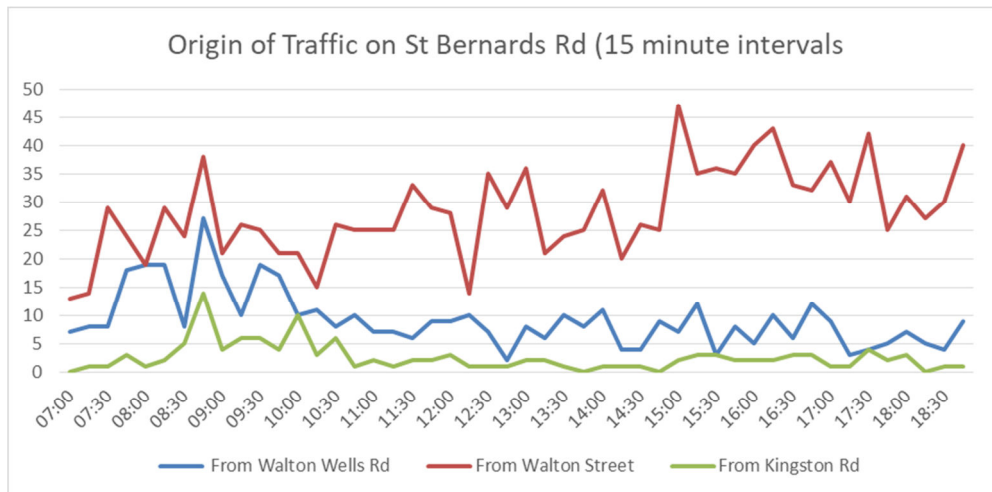
(*results taken from 28.1.2020)



Throughout the course of the day, the majority of traffic on St Bernard's Rd (52%) turns southbound onto Woodstock Rd southbound. Note traffic passing onto Bevington Road is limited to cycles.

ORIGIN OF TRAFFIC ON ST BERNARD'S ROAD

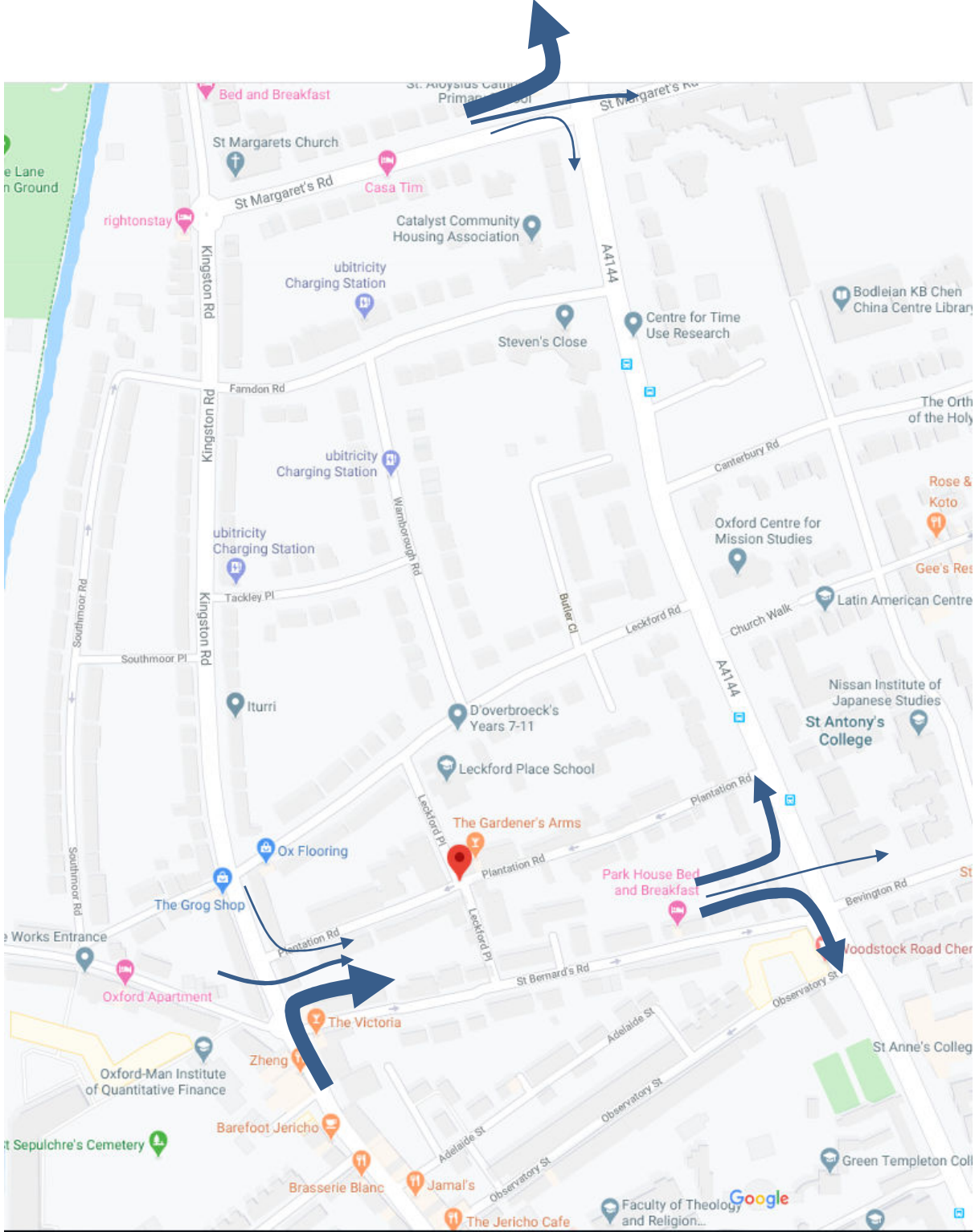
(*results taken from 28.1.2020)



Throughout the course of the day, the vast majority (71%) of traffic on St Bernards Road has an origin from Walton Street northbound

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SUMMARY OF TRAFFIC PROPORTIONS AT KEY JUNCTIONS



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SPEED OF VEHICLES WITHIN THE SURVEY AREA

Average speeds from across the surveyed period:

- St Bernard's Rd – 17.7mph
- Leckford Rd – 22.7mph (east bound)
- Observatory Street – 16.8mph
- Little Clarendon St – 16.5mph (west bound)

ROAD SAFETY VIEWS ON THE TRAFFIC MODELLING

These flows - taking account also of the character of the road including the existing traffic calming measures and speeds, and also the reported injury accident history in all three roads - don't present a significant road safety risk.

The attached guidelines on assessing safe walking routes to school – which we use when assessing eligibility for providing schools transport – classifies flows of up to 400 vehicles per hour as low traffic flows. When assessments on roads with flows of circa 400 vehicles per hour, crossing opportunists are good; with the peak St Bernard's Road flow being less than half this flow, we don't raise this as a significant safety concern.

1.5 Analysing the “manual counting” 28 January 2020 (see below raw data)

- **3912 cars driving *into* of Little Clarendon St (one way)**
- **4952 cars driving *out* St Bernard's Rd (one way)**
- **3929 cars driving *into* of Observatory St (one way)**

Again, there is no “before data” (“base-line data”), so we have no way of knowing what the car usage of these roads were under “normal” conditions, prior to the road closure. This means it is not possible to say whether this manual count data taken on 28 January 2020 (“number of cars”) for these three streets is “normal” or higher. However, it is unequivocal that these numbers *became* higher – the closure of the south end of Walton St forced these three roads to become the key exit-entry roads into Jericho/Walton St.

Notably:

- all three roads were already existing one-way routes. The road closure has forced traffic down three narrow streets. These high figures indicate the massive pressure-points that these three tiny roads have been turned into.
- St Bernard's and Observatory are also *purely residential* streets, as well as being narrow.
- Little Clarendon St is entirely a business street (cafes, shops), and narrow.
- The astonishing high number of cars driving into St Bernard's reflects that it was forced to be the first exit road of the entire area.

An outcry from residents of both St Bernard's Rd and Observatory St also affirm that both roads have most definitely experienced extreme traffic volumes as a result of the road closure.

1.6 Chaotic road signs

Around the 19th-21st January 2020, the Council began putting up a series of new temporary road signs for Little Clarendon St, Observatory St, St Bernard's St, Plantation Rd, St Margaret's and Leckford Rd. These signs variously gave messages like “Walton St closed”, “no through road” and so forth. These caused *immense* chaos to traffic, as reported by residents and traders.

Following an outcry from many traders (and supported by around 1000 residents) at the immense chaos and additional negative impact of loss of trade, the Council then put up new signs on 20 March 2020 with revised messages such as “Business and shops open as usual”. However, these still sat alongside the previous signs, adding yet further confusion and chaotic vehicle patterns.

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This means that Council acted with little regard and little understanding of the already existing negative impacts of the road closure, then greatly exacerbated those negative impacts with these confusing signs. Moreover, these signs will have distorted the road tube measuring done between 23 January and 11 February 2020. This is because the two actions were not correlated to each other; both were done out-of-sync to each other.

And as well-recorded by residents, one particular road sign was utterly ignored by drivers – the sign at the Walton St roundabout directing traffic to continue driving to St Margaret’s Rd in order to reach Woodstock Rd was an absurdity. Not only did many drivers ignore this, but for those who did follow this instruction, they *increased traffic* and therefore pollution emissions into Leckford Rd and St Margaret’s Rd.

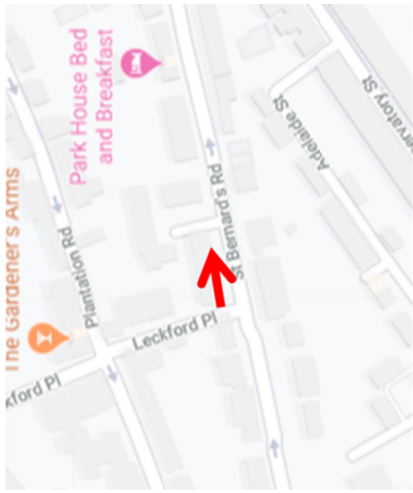
Conclusion:

The ATC, MCC and traffic data are anomalous, highly problematic, corrupted by the counter-confusion of the chaotic temporary road signs. These data are therefore of little use. They merely capture a snapshot of highly chaotic traffic movement and does not – cannot – form the basis for any sensible analysis. They only record highly irregular traffic responding to confusion caused by the simultaneously chaotic road signs. This is in addition to the already existing confusion and chaos caused by the south closure of Walton St.

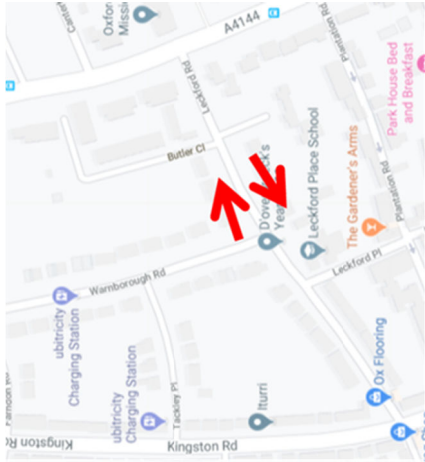
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ATC Start Date		ATC Finish Date																		
23/01/2020		11/02/2020																		
		i.e. 20 DAYS LONG																		
Hour Ending	Thursday 23/01/2020	Friday 24/01/2020	Saturday 25/01/2020	Sunday 26/01/2020	Monday 27/01/2020	Tuesday 28/01/2020	Wednesday 29/01/2020	Thursday 30/01/2020	Friday 31/01/2020	Saturday 01/02/2020	Sunday 02/02/2020	Monday 03/02/2020	Tuesday 04/02/2020	Wednesday 05/02/2020	Thursday 06/02/2020	Friday 07/02/2020	Saturday 08/02/2020	Sunday 09/02/2020	Monday 10/02/2020	Tuesday 11/02/2020
Site Number:	Site 1																			
Road Name:	St Bernard's Road (one-way)																			
Direction AB	ATC																			
Flow from	Leckford Place (W)																			
07:00-10:00	224	220	117	78	175	221	212	194	87	94	67	189	218	186	179	192	136	69	175	181
10:00-16:00	226	193	174	177	170	196	180	191	192	152	144	188	165	180	166	193	151	141	175	0
16:00-19:00	217	190	180	136	180	187	170	208	186	138	114	203	181	166	176	157	129	139	174	0
0000-0000	2576	2832	2361	1918	2247	2465	2454	2465	2394	2171	1682	2404	2439	2255	2339	2533	2177	1723	2170	400
Site Number:	Site 2																			
Road Name:	Leckford Road																			
Direction AB	ATC																			
Flow from	Warnborough Road (W)																			
07:00-10:00	84	109	68	41	115	130	103	119	130	76	62	125	124	121	123	98	68	56	114	115
10:00-16:00	97	88	90	75	101	109	106	96	106	93	86	96	100	109	101	109	113	84	98	0
16:00-19:00	89	103	78	68	113	110	117	114	107	74	64	91	114	133	105	114	84	74	95	0
0000-0000	978	1260	1094	864	1334	1374	1373	1355	1491	1198	980	1130	1333	1399	1287	1454	1337	942	1238	341
Direction BA	Butler Close (E)																			
07:00-10:00	99	120	41	27	134	116	139	120	123	70	22	131	121	134	116	106	69	25	130	133
10:00-16:00	84	87	85	65	75	70	78	72	78	94	74	77	74	88	80	93	115	62	74	0
16:00-19:00	103	91	74	55	93	95	104	85	83	71	65	93	98	86	82	106	72	66	83	0
0000-0000	992	1148	922	737	1147	1083	1141	1138	1176	948	778	1098	1142	1165	1162	1234	1057	696	1112	321
Site Number:	Site 3																			
Road Name:	St Margaret's Road																			
Direction AB	ATC																			
Flow from	Kingston Road (W)																			
07:00-10:00	0	170	104	0	130	138	141	146	155	113	69	139	114	149	150	0	109	47	141	129
10:00-16:00	136	147	134	0	142	124	164	176	163	118	111	176	163	183	156	141	128	98	152	0
16:00-19:00	164	139	115	51	212	180	152	179	156	94	83	154	166	168	172	143	91	86	166	0
0000-0000	1297	1604	1025	213	1739	1779	1772	1722	1735	1441	1067	1610	1724	1762	1719	1047	1431	928	1654	369
Direction BA	A4144 Woodstock Road (E)																			
07:00-10:00	0	83	53	0	76	86	78	78	62	35	29	80	66	83	88	0	47	23	93	74
10:00-16:00	61	60	69	62	45	71	62	53	72	49	56	56	58	62	49	51	68	43	55	0
16:00-19:00	59	74	49	34	75	75	61	55	80	59	40	64	68	61	69	64	45	43	61	0
0000-0000	539	785	516	100	723	864	723	768	768	633	492	732	768	772	794	432	642	431	770	189
Site Number:	Site 4																			
Road Name:	Observatory Street (one-way)																			
Direction AB	ATC																			
Flow from	Adelaide Street (NE)																			
07:00-10:00	0	135	68	56	150	147	157	140	125	68	62	147	126	134	160	136	79	50	131	144
10:00-16:00	113	122	110	113	128	115	120	120	122	117	105	107	113	106	107	130	136	110	120	0
16:00-19:00	136	141	0	99	136	164	164	150	157	130	103	138	152	150	159	156	119	89	139	0
0000-0000	1172	1817	838	1273	1770	1084	1778	1844	1895	1578	1234	1640	1727	1767	1840	1678	1563	1273	1094	306

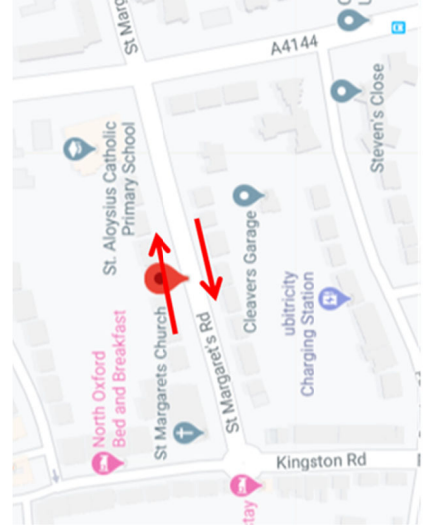
Traffic Analysis Report



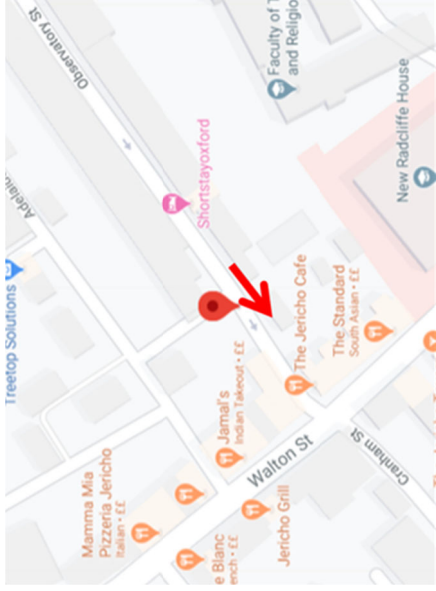
ATC Site 1 St Bernard's Road (ONE-WAY)
Flow AB Leckford PI to Arthur Garrard CI



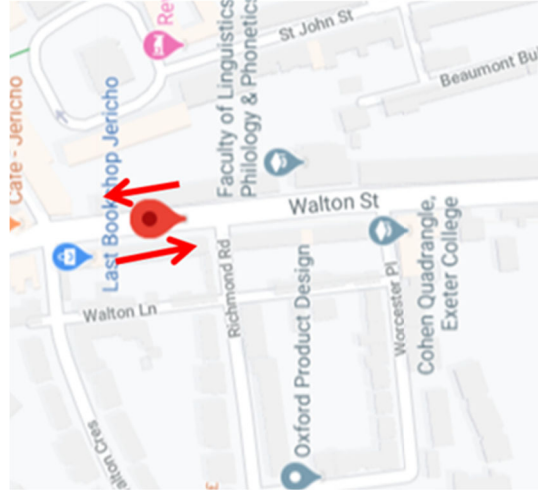
ATC Site 2 Leckford Road
Flow AB Warnborough to Butler
Flow BA Butler to Warnborough



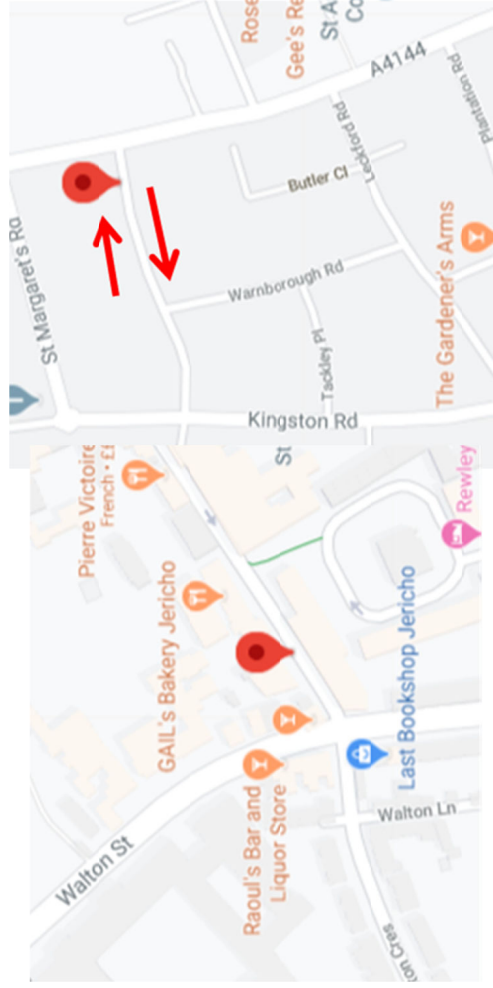
ATC Site 3 St Margaret's Road



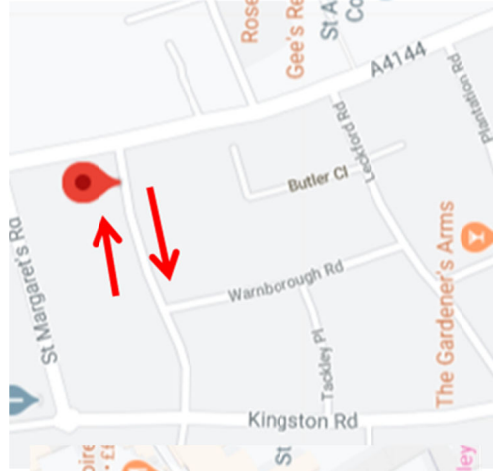
ATC Site 4 Observatory St (ONE-WAY)



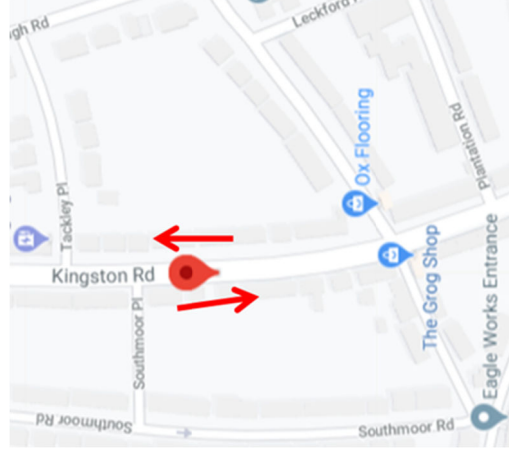
ATC Site 5 Walton Street



ATC Site 6 Little Clarendon St



ATC Site 8 Farmdon Rd



ATC Site 9 Kingston Rd

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“Manual Counts” on 28 January 2020 (the three key entry/exit points are selected here)

Junction Number:	Site 4								X Coordinate	Y Coordinate												
Date of Survey:	28.01.2020	i.e. driving INTO LCS							51.758865	-1.260825												
Junction Name:	A4144 Woodstock Road / Little Clarendon Street																					
Junction Type:	T-Junction																					
	Arm C Approach										Arm C Exit											
	Cars	LGV	OGV1	OGV2	Buses	M/C	Cycle	Cars	LGV	OGV1	OGV2	Buses	M/C	Cycle	Cars	LGV	OGV1	OGV2	Buses	M/C	Cycle	
07.00-18.45							679	825	245	34					31	734						
07.00-18.00							2586	3087	925	127					119	2808						
							3265	3912	1170	161					150	3542						

Junction Number:	Site 6								X Coordinate	Y Coordinate												
Date of Survey:	28.01.2020	i.e. driving INTO St Bernards							51.761797	-1.268204												
Junction Name:	Kingston Road / St Bernard's Road / Walton Street / Walton Well Road																					
Junction Type:	4-arm Roundabout																					
	Arm B Approach (driving out of St Bernards)										Arm B Exit (driving into entry of St Bernards)											
	Cars	LGV	OGV1	OGV2	Buses	M/C	Cycle	Cars	LGV	OGV1	OGV2	Buses	M/C	Cycle	Cars	LGV	OGV1	OGV2	Buses	M/C	Cycle	
07.00-18.45							15	1311	276	12					30	294						
07.00-18.00							54	4952	1071	44					109	1120						
							69	6263	1347	56					139	1414						

Junction Number:	Site 5								X Coordinate	Y Coordinate												
Date of Survey:	28.01.2020	i.e. driving out of Observatory St							51.760554	-1.266812												
Junction Name:	Walton Street / Observatory Street / Cranham Street																					
Junction Type:	Crossroads																					
	Arm B Approach (driving out of Observ St)										Arm B Exit (driving into Observ St)											
	Cars	LGV	OGV1	OGV2	Buses	M/C	Cycle	Cars	LGV	OGV1	OGV2	Buses	M/C	Cycle	Cars	LGV	OGV1	OGV2	Buses	M/C	Cycle	
07.00-18.45	1052	193	5				160								9							
07.00-18.00	3929	743	17				608								34							
	4981	936	22				768								124							

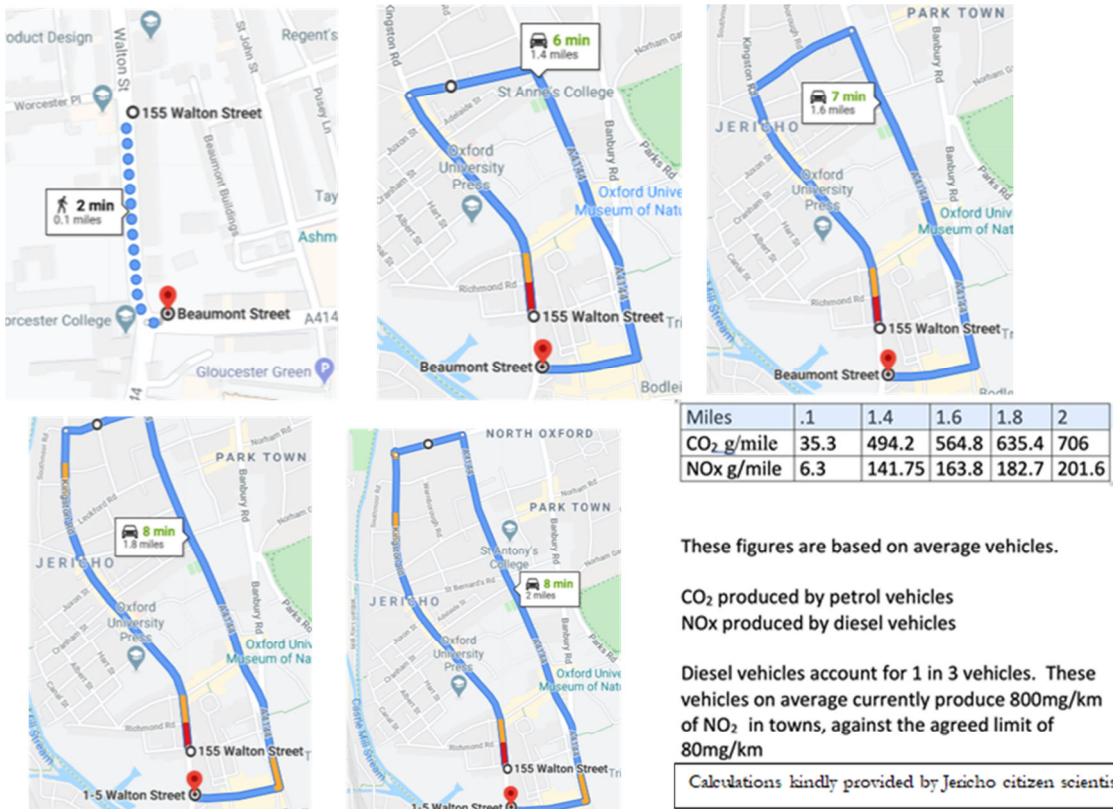
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2. The link between chaotic traffic post-closure and air quality

The analysis of air quality has been set out in the accompanying Air Quality Analysis Report. The key point from that analysis is that there is no reliable NO² data; there is no scientific range of data with which to establish an informed and accurate picture and the NO² levels for 2017-18 are well below the acceptable limit.

Here, the link to traffic chaos post-closure is that closing Walton St has forced vehicles to make excessively longer journeys, thereby emitting more pollution. This flies in the face of the “reasons” the Council gave for justifying the ETRO closure. The visuals say it all.

The distance from Worcester PI junction to the Beaumont St junction is 0.1 miles. With the road closure, to make the same journey, a resident at that section would have to travel 1.4 miles if using St Bernard’s Rd, 1.6 miles if using Leckford Rd, 1.8 miles if using Farndon Rd, or 2 miles if using St Margaret’s Rd. And that is without factoring in the usual heavy congestion on Woodstock Rd, St Giles and Beaumont St.



The road closure has done nothing more than dramatically increase car journeys and thereby increasing NO² and CO² emissions. As the Council placed a temporary sign on the Kingston Rd/St Bernard’s Rd junction directing drivers to use St Margaret’s road, this served, by the Council’s own action, to effectively force cars to make longer journeys and emit higher pathogenic pollution. Even worse, it has turned the closed end of Walton St into a “private car park”. Those residents now make longer journeys and emit higher pathogenic emissions into the breathing environment over a wider area of Walton Street and its capillary roads.

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Conclusion: How does any of these weak data meet the 'justifications' stated in the ETRO documentation? It does not, in any scientific manner at all. The air quality is low at the only station of measurement (Lamppost 18); there is no 'true' picture of air quality in the wider area – and certainly not at the closed end of Walton St because Lamppost 18 is incorrectly marked to be at that closed location. It is not, it is at a very different location. All the traffic data is weak and mostly irrelevant to the any of the wider area of Jericho/Walton St – there are, quite simply, no data that bear any direct relevance to the entire area, let alone to any attempt to justify the road closure.

Moreover, the Council has provided very superficial and brief 'reasons' for the ETRO:

- In the Council's "Statement of Reasons"³, it states "As a result of **concerns over safety and the adverse environmental impacts** of motor traffic on Walton Street, Kingston Road and neighbouring residential roads [...]" - **there is no evidence**
- On the Council's webpage⁴, it states: "The County Council sees this trial as having the key benefits of:
 - **Improving air quality** in the direct area - **there is no evidence**
 - **Reducing traffic congestion** in the local area by removing the signalised junction of Walton Street/ Worcester Street - **there is no evidence**
 - Helping to **create a safer environment** for Cyclists and pedestrians within the city
 - **Reducing "rat running"** - **there is no evidence**
- On the Council's webpage⁵, it states: "Why close Walton Street
 - Oxfordshire is undergoing growth in housing and jobs which will put extra pressure on its roads, including Oxford's city centre - **there is no evidence this relates to the single south-end point of Walton St**
 - Reducing traffic is linked to growing concern about climate change and the impact of vehicle emissions on health.
 - The closure complements wider measures the county council and Oxford City Council are working on with Connecting Oxford and Oxford Zero Emission Zone - **there is no evidence this relates to the single south-end point of Walton St**
 - Together these measures are intended to **provide an improved environment for local residents and businesses** - **there is no evidence for the whole Jericho/Walton St area**
 - Restricting access enables Walton Street to **return to a quiet residential street**. This is a concept the county council is keen to explore across Oxfordshire as part of a 'Low Traffic Neighbourhoods' initiative which would make travelling on foot or by bicycle a more pleasant option - **there is no evidence; and Walton St has never been a "quiet residential street". This point smacks of a direct attack upon the Walton St traders, and the Walton St 'local economic hub'.**

These superficial, ill-thought out and zero-data-substantiated reasons smack of superficial, anecdotal and "imagined" **assumptions**.

There is simply no strong reliable traffic data to work with – and **most certainly not in an informed scientific manner** that can possibly back up the above Council 'reasons' for road closure. There is no data to identify any "lack of safety". The data does not identify any evidence for "adverse environmental impact". All the air quality and traffic data **do not provide any scientific evidence** of poor air quality, unsafe environments or rat-running. Neither does the data provide any scientific evidence to justify how the road closure would "improve the environment". There has been no survey of "local residents and businesses" many different uses of the wider area and its roads, and no survey of their many different needs.

³ <https://consultations.oxfordshire.gov.uk/consult/ti/WaltonStreetFormalExperimental/consultationHome>

⁴ <https://consultations.oxfordshire.gov.uk/consult/ti/WaltonStreetExperimentalTRO/consultationHome>

⁵ <https://www.oxfordshire.gov.uk/residents/roads-and-transport/roadworks/major-current-roadworks/walton-st-experimental-closure>

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On the basis of this astonishing absence of logic on the part of the Council, related Councillors including Councillor Yvonne Constance, the closure of the south end of Walton St smacks of a ‘stab in the dark’ action, randomly picking one junction that is entirely disconnected to a much wider geographic area of inter-related and inter-dependent capillary roads and multi-user, multi-need factors.

The reasons given in the aforementioned ETRO for Walton St are in astonishing contradistinction to the Council’s claims of “strategic vision” to create “thriving communities” and “thriving economies”.^{6,7,8} Instead, the closure of Walton St has dramatically and very seriously affected the local Jericho community and the Walton St traders.

So too does this wider geographic area comprise different ecological areas, requiring different understandings and requiring different approaches (to traffic calming measures). What all this **does clearly ascertain is that the Council has been influenced by opinions and “influencers” that bear no relation to the majority (democratic) voices of the area** under question, and influenced by imagined assumptions and hidden agendas. The original (first) “consultation” lists “key stakeholders”, of whom none correctly represent local residents and local traders. Instead, these “stakeholders” are not resident or operating businesses in the local area. Yet Council has allowed themselves to be “influenced” by them, instead of reaching out to and directly engaging and communicating with truly local residents and traders. **This is not democratic.**

In the Council’s “vision”, it clearly states that “we will”...⁹

However, the analyses from the three reports (Air Quality Analysis, Traffic Analysis and Socio-Demographic Analysis) all combine to demonstrate quite clearly that Council’s road closure of Walton St has, instead:

- failed to engage directly with residents
- failed to include “older and disabled people” in any care or thought in the Walton St closure, effectively disconnecting and dis-abling the vulnerable community
- failed to “care for those in greatest need”
- failed to consider how the road closure would negatively impact safety, healthy lives and active lives
- failed to “protect the local environment” by *increasing traffic and pollution*
- failed to “support a thriving local economy”, failed to “improve transport links” and done nothing to “create jobs and homes for the future”

The Walton St ETRO is strikingly obviously an action that has done nothing more than superficially “jump on the bandwagon” of the “climate emergency” with nothing more than knee-jerk actions that have excluded the voices, opinions and long-time knowledge (familiarity) of the local ‘true’ stakeholders.

Our vision: Thriving communities for everyone in Oxfordshire

Our vision for thriving communities for everyone in Oxfordshire.

We have a vision ‘Thriving communities for everyone in Oxfordshire’ – a place where people want to live and work and be part of something different.

To achieve our vision, we will:

- listen to residents so we can continuously improve our services and provide value for money
- strive to give every child a good start in life, and protect everyone from abuse and neglect
- enable older and disabled people to live independently. We care for those in greatest need
- help people live safe, healthy lives and play an active part in their community
- provide services that enhance the quality of life in our communities, and protect the local environment
- support a thriving local economy by improving transport links to create jobs and homes for the future

⁶ <https://www.oxfordshire.gov.uk/council/our-vision>

⁷ <https://www.oxfordshire.gov.uk/council/our-vision/our-vision>

⁸ https://www.oxford.gov.uk/info/20238/oxfords_economy/947/oxfords_economic_growth_strategy

⁹ <https://www.oxfordshire.gov.uk/council/our-vision/our-vision>

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3. Traffic Calming

3.1 This is what Oxford County Council's website information says on "Traffic Calming & Speedbumps":¹⁰

How traffic calming is paid for, and when it is used:

'Traffic calming' is a term used to describe a range of measures for slowing down traffic. Measures range from road humps and bus cushions to gateways and special road signs or lining.

All proposals for traffic schemes are assessed against Local Transport Plan priorities when making the decision whether to proceed. We identify locations and routes which have the highest injury accident histories and where schemes can be designed to reduce these problems. Funding is allocated from the overall spending limits allocated to us by the Government but traffic schemes need to meet the LTP criteria to have a chance of success. Priority is given to those schemes achieving the best 'pay back' in terms of reduced road accidents and injuries.

Traffic calming in Oxfordshire:

Traffic calming is introduced where there are recorded injuries. This is often in conjunction with district, town or parish councils. Smaller and rural communities with a poor safety record are also considered for suitable traffic calming measures. Traffic calming is now widespread across the county and road hump schemes have reduced accidents by an average of 50%.

Problems with traffic calming:

Finance - Some remaining problem sites are very difficult to cure and are unlikely to benefit solely from traffic calming. Small numbers of injury accidents are spread out over wide areas, which would require extensive measures and therefore a large amount of money. This makes it difficult to treat these areas on the money available. The 'payback' on such schemes is greatly reduced and therefore less attractive as a bid to the Department.

Consensus - Consultation is an important part of any new traffic measure. However, getting a consensus opinion is difficult and time-consuming. This can be frustrating for those who wish to see results quickly

Pollution - Studies show that pollution can be minimised if drivers maintain a constant, low speed when going over humps

Popularity - Traffic calming is not favoured by everyone and communities may have differing expectations or reservations about traffic calming

What is interesting in this Council webpage outlining its position on traffic calming measures, is that it seems to base the need for traffic calming mainly on "highest injury accident" history, and there has to be "best payback" for reduction of injuries. Yet there is no data recorded or provided by Council to indicate any injury history on Walton St. If the ETRO road closure of Walton St was primarily for traffic and pollution (of which there is not data anyway), then there can be no further reason to close Walton St for "injuries".

Furthermore, the Council webpage makes clear it is concerned about the costs of introducing traffic calming measures. Yet, the ETRO process, the short road-tube measurements and the plethora of chaotic road signs have all cost money – knee-jerk costs to knee-jerk reactions...nothing has been well-thought out or preplanned.

And furthermore, it clearly states that that any low "payback" makes it all "less attractive" to the Council's cost expenditure. Yet it chooses to spend money on an ill-thought out, knee-jerk closure of one random end of a road with no data whatsoever.

¹⁰ <https://www.oxfordshire.gov.uk/residents/roads-and-transport/traffic/traffic-calming>

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It also states that “consultation” is important, but time-consuming. Yet it chooses to quite brutally shut a road down with no proper consultation, let alone any proper survey/data collection.

It also states that pollution can be minimised by traffic calming measures, yet this has never been considered instead of the random, illogical closure of one end of a road. And as this Traffic and the Air Quality Analysis Report have shown, the road closure has actually created chaotic increases in traffic and pollution.

Finally, on “popularity”, the Council has chosen a road closure route that has caused immense anger and negative impact on the community...instead of talking to and including the community in working out an appropriate action.

Conclusion:

Clearly, the **Council could not be bothered at all to actually help the Jericho/Walton St area to calm traffic and reduce pollution.** It tried to take what it thought would be an “easy” option, to immense detriment to the community. It has instead angered the community and wasted a lot of finances, instead of just doing things properly in the first place.

In an ironic twist, **Council’s big “Connecting Oxford” project is entirely dis-connected** to the entirely evidence-less closure of Walton St and the evidence-less “reasons” listed in the Walton St ETRO and consultation documentation. The closure of Walton St is **entirely divorced** from both Council’s “Connecting Oxford” and from reality on the ground. Moreover, the closure of Walton St has in fact entirely **dis-connected** the wider Jericho area and **dis-connected** the local economic hub of Walton St traders.¹¹

The **Council has not done any comprehensive survey of the whole area**, so there is no “big picture” data or evidence. **Therefore, Council cannot possibly know how best to reduce “rat running”, let alone be in a position to make correct decisions about which streets to shut or traffic-calm.**

¹¹ <https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/policy-and-overall-strategy>

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4. Legislation

Conclusion:

This section (below) highlights the relevant points selected out from the regulatory documents that enable Local Authorities to implement “experimental (temporary)” and “permanent” traffic regulation orders (TROs).

What is clear is that while Oxford Council are permitted by the regulations to issue an ETRO and close Walton St, and launch a “consultation” in that process:

- It is a **brutal, aggressive approach** that is entirely **excluding the voices and opinions of the community** ;
- It is astonishingly **undemocratic** – it represents only the ideas and wishes of a few Councillors. It does not represent the wishes of the majority of the affected community who are the voting constituents and tax-payers;
- **The “consultation” is not a consultation** that anyone would quite rightly expect a consultation to be – to consult a community with the view of taking action of a majority, democratic consensus...and with great effort made to ensure the resulting decision/action meets as many needs as possible;
- Instead, **the “consultation” has actually been enacted as a pre-determined decision**, and only collecting responses to “tweak” the pre-determined closure;
- This sends a very strong signal that **Council is and has been planning to move the Experimental (temporary) order straight into a Permanent order**, of Council’s own volition and decision;
- All this has the effect of achieving nothing more than **bulldozing over the community**;
- It is also an effect of **“state-violence”, forcing the decision of a few in power** onto the majority voting constituents
- The Road Traffic Regulation Act 1984 *might permit* Oxford Council to slap an ETRO on one end of Walton St, **but that does not mean that is the correct approach to take**;
- In the regulation text below, it states “As indicated below, this is **not a simple thing** to make an Order and **can often be expensive**. A local authority is unlikely to make a TRO **unless it has a significant problem and substantial local support**.” Quite clearly, Oxford Council has completely disregarded local opinion, wishes, and needs; has very little local support; and has NO EVIDENCE whatsoever of any “significant problem” in Walton St.

The Walton St road closure is, in sum, a belligerent, antagonistic and hardline approach by the Council, and supported blindly by Councillors who are not listening to or correctly representing their own constituents’ voices, wishes and needs. This is a failure of governing authority, and a failure of democratic process.

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The *Parliamentary Research Briefing* (Standard Note: SN6013, last updated: 17 November 2014)¹² outlines UK government rules on issuing Traffic Regulation Orders (TROs) on roads to Council Highway authorities. This draws on the *Road Traffic Regulation Act 1984*¹³.
...[relevant sections have been selected]

SECTION 1

Highway authorities can place various restrictions on traffic within their areas by way of a Traffic Regulation Order (TRO) made under Parts I, II and IV of the Road Traffic Regulation Act 1984, as amended. Section 1(1) states that **permanent orders** may be made for the following purposes:

1) The traffic authority for a road outside Greater London may make an order under this section (referred to in this Act as a “traffic regulation order”) in respect of the road where it appears to the authority making the order that it is expedient to make it—

(a) for avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising, or

(b) for preventing damage to the road or to any building on or near the road, or

(c) for facilitating the passage on the road or any other road of any class of traffic (including pedestrians), or

(d) for preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property, or

(e) (without prejudice to the generality of paragraph (d) above) for preserving the character of the road in a case where it is specially suitable for use by persons on horseback or on foot, or

(f) for preserving or improving the amenities of the area through which the road runs or

(g) for any of the purposes specified in paragraphs (a) to (c) of subsection (1) of section 87 of the Environment Act 1995.

Section 14(1) states that **temporary orders** may be made for the following purposes:

1) If the traffic authority for a road are satisfied that traffic on the road should be restricted or prohibited—

(a) because works are being or are proposed to be executed on or near the road; or

(b) because of the likelihood of danger to the public, or of serious damage to the road, which is not attributable to such works; or

(c) for the purpose of enabling the duty imposed by section 89(1)(a) or (2) of the Environmental Protection Act 1990 (litter clearing and cleaning) to be discharged, the authority may by order restrict or prohibit temporarily the use of that road, or of any part of it, by vehicles, or vehicles of any class, or by pedestrians, to such extent and subject to such conditions or exceptions as they may consider necessary. Temporary orders have a maximum time limit of 18 months’ duration except where an order is for works on the road that cannot be executed within that time.

As indicated below, this is **not a simple thing** to make an Order and **can often be expensive**. A local authority is unlikely to make a TRO **unless it has a significant problem** and **substantial local support**.

SECTION 2: Procedure for making a TRO

2.1 Permanent orders

The procedure to be adopted by a local authority for making permanent orders is set out in:

the *Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996* (SI 1996/2489) as amended; and the *Local Authorities' Traffic Orders (Procedure) (Scotland) Regulations 1999* (SI 1999/614), as amended. As this is effectively a devolved matter for Scotland, the rest of this section talks about England and Wales only.

The procedure for making a TRO in England and Wales is as follows:

- Preliminary requirements: The authority should consult with any body specified in Regulation 6 (depending on the order, other authorities and/or emergency services) and it must publish a notice in a local newspaper. It

¹² <http://researchbriefings.files.parliament.uk/documents/SN06013/SN06013.pdf>

¹³ <http://www.legislation.gov.uk/ukpga/1984/27/contents>

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shall ensure that adequate publicity is provided to those likely to be affected. This may include display of notices in the relevant area and distribute the same to local properties and road users (though there is no requirement to do this specifically so long as other publicity is adequate. The relevant documents must be held on deposit from the date that the notice of proposal is first published and must remain on deposit until six weeks after the proposed Order has been made (or a decision has been made by the authority not to proceed with the proposal).

- Public objections and inquiries: Anyone may object in writing to an order by the date specified on the notices or if later within 21 days of the notice being given and publicity being adequate (see above). A public inquiry only has to be held in certain circumstances, namely: that it affects loading and unloading at certain times of the day; or bus services. Full details are given in Regulation 9. If the authority decides to hold a public inquiry it must give notice of the fact and the inquiry must begin within 42 days of that notice being made. The inspector decides how the inquiry is to proceed.
- Consent for certain schemes: The Secretary of State's consent is required where, for example, a scheme affects a road for which (s)he is the traffic authority; where a scheme will restrict access to property for 8/24 hours; and a scheme involving speed limits, particularly where the limit is 30mph or less. Full details are given in Schedule 9, Part II of the 1984 Act.
- Making an order: Orders cannot be made before the statutory period for objections has ended or after a period of two years from the making of the initial notice. Within 14 days of making the order the authority must place a notice in the local press announcing their decision, ensure again that adequate publicity is given to the making of the order and write to those who objected to the proposal outlining the reasons for their decision to proceed. Any traffic signs required as a consequence of the order must be in place before it comes into force.

2.2 Experimental orders

There are separate rules for experimental orders, as set out in Regulations 22 and 23 of the 1996 Regulations (see above).

These provide that the provisions on publication of proposals objections that apply to permanent orders shall not apply to an experimental order. No provision of an experimental order shall come into force before the expiration of the period of seven days beginning with the day on which a notice of making in relation to the order is published.

Making an experimental order as a precursor to a permanent order can have material benefits, specifically it can truncate the requirements as to consultation, notice of proposals and objections, providing other requirements have been met (see Regulation 23). This can be a more cost effective and flexible approach (allowing e.g. for immediate feedback and minor changes) than a permanent order or a temporary order (which cannot be converted into a permanent order – see below).

2.4 Consultation on possible changes to advertising rules, 2012

In January 2012 the Government published a consultation document¹⁴ containing proposals to alter the advertising requirements for TROs. Point 2: "2. To promote localism by allowing the flexibility for Traffic Authorities to select the most appropriate method of communication to enable residents and stakeholders to be informed, and communicate their views, subject to a reasonableness test."

and

"Other key non-monetised benefits by 'main affected groups' It is anticipated that by tailoring their methods of communication, Traffic Authorities will achieve better levels of awareness amongst their target audience than

14

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/4456/impact-assessment.pdf

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by using the present 'one size fits all' approach of advertising in local newspapers. A more targeted approach will lead to benefits for local road-users in planning their travel arrangements.”

And

“It is assumed that Traffic Authorities will use the change in requirements to select the most appropriate method of communicating TOs to their communities, which is expected to create better awareness at lower cost.”

The paper explains the current arrangements and their implications as follows:

At present, for all TOs [traffic orders], traffic authorities (TAs) are required to advertise proposals in a local newspaper, and in the case of the LAs, they must use an additional form of publicity, such as notices to affected properties or notices placed in the affected road. In the case of the HA [Highways Agency], as well as advertising in local newspapers, they must also advertise all permanent orders in the London Gazette.

Many more channels of communication have evolved since the regulations were written in the nineties, and we propose to enable TAs to decide the most suitable method(s) for them in given circumstances without barriers to using modern methods. This approach embraces the government’s aim to enable local decision making and will ensure consistency in the requirements placed on LAs [local authorities] and the HA.

Whilst much of the cost of advertising is currently met by TAs, where TOs are made at the request of business such as utility companies or event organisers, they are usually asked to bear that cost. As such our estimates in the impact assessment show a potential saving to business of £5.9 million annually.

The Government’s proposal is therefore to remove all the specific requirements as to the format in which advertisements should be made:

It is proposed here that all specific requirements of how orders must be publicised should be removed. Publicity must still take place to the same time-scales as at present, but will be up to the TA to decide in each case what methods are appropriate. Clearly, different types and extent of publicity will vary depending on the nature of the expected impact and duration of the order, so there will be no standard answer. We plan to issue guidance at the same time as any new regulations to help TAs to make choices that are reasonable in light of who they need to reach. The DfT contends that the proposal is, in effect, a de-regulatory measure, intended both to save money and to bring the notification advertising requirements for TROs into the electronic age while giving local authorities the power to decide the right means method of advertising for their local areas.

However, the paper does acknowledge that the proposed measures proposed might have an impact on the revenues of local newspapers. The accompanying impact assessment states:

Local newspapers will lose revenue from publishing Traffic Orders. Assuming 20% of local traffic authorities will continue to publish in newspapers, the newspapers will lose £16.5m in revenue annually from advertising planned and made TOs, but economic theory suggests that advertising rates will adjust and hence demand will rise to fill the space available in the newspapers dedicated to adverts. Thus, the final change in revenue will be far less than this. This impact on revenues is considered to be an indirect effect of this deregulatory change. Where the present arrangements can no longer be justified, local newspapers cannot continue to expect to receive what is in effect, public sector subsidy through the continued placing of these adverts. The government strongly favours the use of on-line publication, and of other lower cost options to communicate with interested parties.

It also states:

We anticipate that by ceasing to advertise in local newspapers and using alternative methods local people will become better informed as traffic authorities will have discretion to target the relevant audience in the most appropriate way [...] There could be an impact on groups in society who presently use the local newspaper medium to find out about TROs. It will be the responsibility of the relevant Traffic Authority to make sure such groups are kept adequately informed.

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The consultation closed in April 2012. In February 2013 the Transport Minister, Norman Baker, told the House that the Government would not, at present, be proceeding with the change:

We received a large number of representations on this matter, with a clear majority of responses from local government being in favour of the proposed change, and a clear majority of responses from MPs and local newspapers being against any change. I have therefore decided to not change the present arrangements at this point, but, with colleagues across Government, to keep the matter under review.

SECTION 3: What TROs can be used for

Section 2 of the 1984 Act sets out what TROs may be used for and it includes almost anything prohibiting, restricting or regulating the use of a road by traffic or pedestrians, including parking:

1) A traffic regulation order may make] any provision prohibiting, restricting or regulating the use of a road, or of any part of the width of a road, by vehicular traffic, or by vehicular traffic of any class specified in the order,—

(a) either generally or subject to such exceptions as may be specified in the order or determined in a manner provided for by it, and

(b) subject to such exceptions as may be so specified or determined, either at all times or at times, on days or during periods so specified.

(2) The provision that may be made by a traffic regulation order includes any provision—

(a) requiring vehicular traffic, or vehicular traffic of any class specified in the order, to proceed in a specified direction or prohibiting its so proceeding;

(b) specifying the part of the carriageway to be used by such traffic proceeding in a specified direction;

(c) prohibiting or restricting the waiting of vehicles or the loading and unloading of vehicles;

(d) prohibiting the use of roads by through traffic; or

(e) prohibiting or restricting overtaking.

(3) The provision that may be made by a traffic regulation order also includes provision prohibiting, restricting or regulating the use of a road, or of any part of the width of a road, by, or by any specified class of, pedestrians—

(a) either generally or subject to exceptions specified in the order, and

(b) either at all times or at times, on days or during periods so specified.

(4) A local traffic authority may include in a traffic regulation order any such provision—

(a) specifying through routes for heavy commercial vehicles, or

(b) prohibiting or restricting the use of heavy commercial vehicles (except in such cases, if any, as may be specified in the order) in such zones or on such roads as may be so specified, as they consider expedient for preserving or improving the amenities of their area or of some part or parts of their area.

3.1 Banning lorries from residential areas

As indicated above, section 2(4) allows TROs to restrict the use of 'heavy commercial vehicles'. The definition of a heavy commercial vehicle is given in section 138(1) of the Act as any goods vehicle which has an operating weight exceeding 7.5 tonnes. This is the maximum laden weight of a vehicle not drawing a trailer, an articulated vehicle or the aggregated laden weight of a vehicle drawing one or more trailers.

3.2 Parking restrictions

It should be noted that TROs can only be used for specific roads and not to give a general parking prohibition.

Traffic Analysis Report

General (i.e. authority- or area-wide) prohibitions are provided under separate legislation. Decriminalised parking enforcement (DPE) was introduced in England (outside London) in 1995. Under this system parking offences became civil rather than criminal offences and local authorities took responsibility for parking in their areas. On 31 March 2008 this was renamed civil parking enforcement (CPE) and some changes were made to the enforcement and appeals process. A general outline of the decriminalised/civil parking regime is given in HC Library standard note SN2235.

Special parking bays for disabled people on the highway may be designated by the local authority under a TRO made under section 32 of the 1984 Act. Anyone displaying a blue badge may park there. These are enforceable by law and the police and local authorities have powers to prosecute offenders under section 35A of the Act. However, since making a TRO is a relatively complicated and costly process, local authorities will often mark out a disabled parking space without introducing an order. Such a space is only advisory and there is no legal sanction to prevent other people using the space.

Experimental orders can be used for things like tackling pavement parking. For example, Slough Borough Council has introduced a borough wide ban starting with Central Ward: they are rolling out an experimental TRO and permitting pavement parking in marked bays only.