

BURFORD TOWN COUNCIL: RESPONSE TO WEIGHT LIMIT CONSULTATION.

SUMMARY

Burford Town Council requests OCC progress the banning of HGVs from Burford High Street and most strongly supports the proposed 7.5 tonne weight limit restrictions on Burford High Street for:

- Environmental reasons
 - Preservation of medieval listed buildings within an AONB
 - Highest percentage, 94%, of any High Street in the UK
- Preservation of Burford's £15m tourism business
 - Its main business
- Reduction of air pollution – Primary school 25 m from the High Street

Traffic surveys of HGVs by OCC show that:

- South of Burford, 50% of HGVs travel to/from Stow on the Wold and 50% travel to/from Chipping Norton
- North of Burford 60% of HGVs travel to/from Witney, 30% to/from Swindon
- 86% of the HGV traffic between Burford and Chipping Norton travel to/from Banbury
- Very little HGV traffic stops terminates locally, either within Burford or Chipping Norton, or between
 - Burford and Stow on the Wold
 - Burford and Chipping Norton
 - Chipping Norton and Banbury
- The HGV traffic flow through Chipping Norton Horsefair is likely to reduce by 28% after the Burford weight limit is imposed

Three key conclusions can be drawn:

1. 50% of the Burford High Street HGV traffic goes on the A361 to Stow on the Wold
2. 90% of the Burford Chipping Norton HGV traffic go between either Banbury and Witney or Swindon
3. Chipping Norton would be a major beneficiary of the Burford Weight Limit, as its air pollution levels would be returned to safe levels within legal limits.

Alternative routes

HGVs banned from Burford High Street must divert elsewhere. HGV drivers can be expected to follow a route that minimises total operating costs taking time and distance into account. Our thorough analysis of likely alternative routes indicates that the diverted traffic would largely remain on the trunk road system and is unlikely to give rise to new environmental problems.

HGVs between Burford and Stow on the Wold presently use the A424 between the two towns. After the weight limit is imposed, HGVs would be directed to use the A40/A429 route, which they are advised to do at the present but is mostly ignored. On paper, the "rat run" through Burford saves time and distance, but operating cost savings are limited by the frequent delays on Burford High Street (typically 10-15 minutes) and the additional fuel consumption from passing through the steep Windrush valley, so the net impact on hauliers may not be significant. In any event, there would be no impact on the traffic through Stow on the Wold.

- **HGVs between Burford and Chipping Norton** presently use the A361 between the two towns. Only two alternative routes need to be considered: **Banbury and Witney** and **Banbury and Swindon**
 - **Banbury-Witney:** After Burford High Street weight limit has been imposed, the quickest route for HGVs between Witney and Banbury will be via the M40/A34/A40. With a similar timings and shorter distance compared with going via Burford now, all HGVs should be encouraged to use this route, using the Wolvercote roundabout where the recent works have significantly increased capacity, and should readily absorb the insignificant (1%) increased volume of traffic.
A possible shorter, circuitous route, with restrictions, using the A4095 is available today but it passes through congested junctions in Witney and Banbury and its use is discouraged e.g. the Oxfordshire Freight Gateway does not allow the route. Nonetheless, additional signage should be erected in Banbury and Witney to encourage use of the motorway route.
The HGV route past Woodstock is 20 minutes longer than the quickest route and therefore would not be used by a rational operator.
 - **Banbury- Swindon:** After the weight limit is imposed, the quickest and shortest route for HGVs between Swindon and Banbury is via M40/A34/A320. This is already marginally shorter and quicker than via Burford today. Routes via Woodstock or Stow on the Wold are both 25 minutes longer and therefore would not be used by a rational operator.

Simpler wording of blue signage is suggested. Additional signage at Banbury and Witney is suggested to encourage HGV use of the M40/A34 route.

Our assessment is that the impact on towns and villages in the area would be neutral or beneficial:

- Woodstock is unlikely to be affected
- South Newington is likely to see a drop by a half of HGVs going through the village
- Chipping Norton is likely to see 28% fewer HGVs on Horsefair resulting in the air pollution coming down to the EU limit
- Stow on the Wold is likely to see no more traffic on the A429 past the town and no increase of HGVs on the A436
- Fulbrook and Shipton under Wychwood would see the removal of most HGVs from their main through roads but they will suffer occasional inconvenience since HGVs from to/from the south will need to divert away from Burford
- Bladon is not likely to see and increase
- Witney is not likely to see an increase and the air pollution should be unaffected

The ban on HGVs will inevitably have some impact on local businesses:

- Hickman Bros Landscapes, a local landscape and skip business on the A361 near Fulbrook, has multiple stops including Burford so, although inconvenienced, would not always be affected
- FWP Matthews, an artisan flour miller in Shipton under Wychwood, would have to route their occasional HGV traffic via Chipping Norton or Stow on the Wold
- Burford Garden Company has deliveries from every direction, and therefore those from the north will need to be re-routed
- Hauliers will be impacted by having to go to Stow on the Wold on the A40/A429, however the added costs may be small due to present delays and high fuel costs by going through Burford

With progress and change there are always those whose activities are impacted. Without action Burford town will suffer; its buildings will continue to deteriorate with the relentless pounding by HGVs and its tourist trade, attracted to the AONB, will continue to be impacted. In Chipping Norton, the air pollution will continue to be above the safe, legal limit. With a new weight limit at Burford large HGV businesses, who heavily use our roads in West Oxfordshire, are likely to modify the software controlling their storage and distribution locations and routes. The result of which is unknown but it may decrease the number of HGVs in the region, certainly not increase.

Enforcement

Enforcement of the Weight Limit will be carried out by OCC Trading Standards with assistance from a Burford Town Council 'Lorry Watch' team and Burford's CCTV system which covers all the High Street.

Costs

All legal costs associated with the TRO are being borne by Burford Town Council. Separately the signage and non-statutory enforcement costs will be community funded when Burford Town Council carry out a fund-raising programme. This will start when the proposed 7.5 tonne limit is fully approved by OCC. All the benefits will arise at no cost to OCC including the air pollution benefits to Chipping Norton, and the significant reduction of HGV traffic in Chipping Norton and South Newington.

All traffic surveys were carried out by OCC, WODC provided the air pollution information and the mileages and routing data are from the OCC Freight Gateway

BURFORD ENVIRONMENTAL WEIGHT LIMIT

Burford Town Council (BTC) has requested removal of HGVs from Burford High Street for 20+ years. It has been the top priority of the Freight Strategy for all the four Long Term Plans of OCC this century. The Council strongly supports the Environmental Weight Limit proposed by Oxfordshire County Council (OCC) and in principle is prepared to community fund the signage and non-statutory enforcement costs of the Weight Limit.

1. BURFORD HIGH STREET

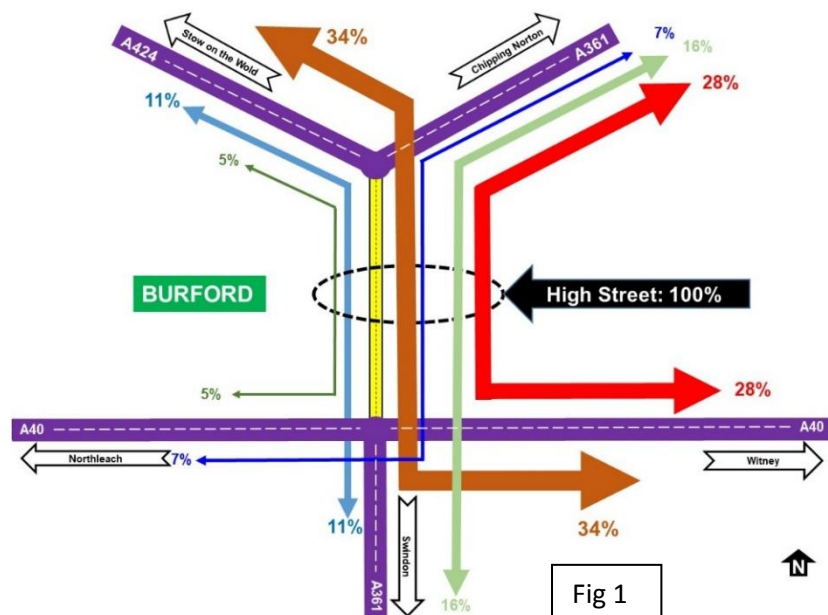
Burford High Street is internationally famous as the gateway to the Cotswolds, lying in an AONB, Conservation Area and the Upper Windrush Landscape Character Area. Its 162 listed buildings date from at least the 13th century and are the essence of its attraction to tourists. Over 1/2 million tourists a year visit from all countries of the globe and 120 businesses trade with them generating £15m pa. Tourists criss-cross the street visiting over 100 historic places in Burford.

The traffic through Burford High Street has been surveyed 20 times at least since 2000 by OCC; all results are very similar. They conclude that there are 12,000 vehicles, **600 HGVs** a day on the High Street going over a single lane, 12th century bridge with rudimentary traffic light control. The consequences are:

- Extended peak delays (15 minutes plus), very frequently extending to the A40 and occasionally almost to the end of the Witney by-pass
- An accident black spot (OCC Long Term Plan)
- Relentless shaking of Burford's listed medieval buildings
- Cancelled bookings in all High Street hotels due to HGV-induced vibrations and noise
- The huge HGVs on the Hill on the narrow High Street create a noisy and threatening environment to tourists, locals and schoolchildren from two schools
- Air pollution, 65% from HGVs, is marginally below the legal limit
- Air pollution-generated acid destroying the mediaeval stonework (e.g. at 8 and 10 High Street, by the traffic lights, and others)
- Brake failure and runaway HGVs on hill (e.g. in 2016)

2. HGV SURVEYS IN AND NEAR BURFORD

The Burford surveys show the following directional movements of HGVs over an 11-hour weekday period in 2016:



In summary the survey shows the following directional percentages of HGVs:

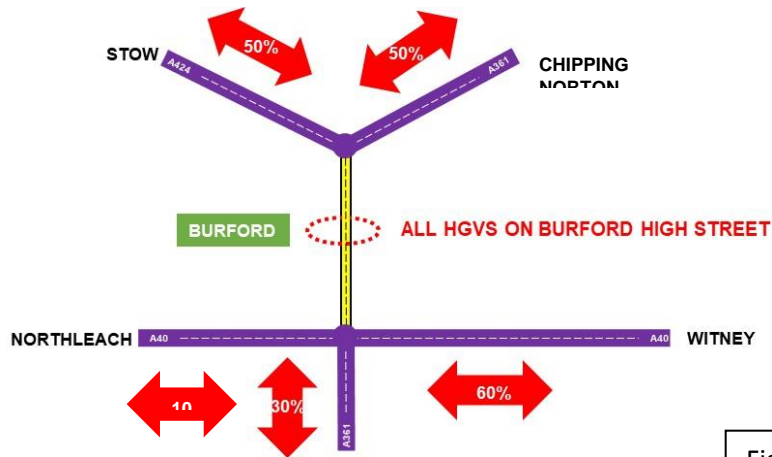


Fig 2

Very few HGVs stop in Burford or between

- Burford and Stow on the A424
- Burford and Chipping Norton on the A361
- Burford and Swindon on the A361
- Burford and Witney and environs on the A40

3. HGV SURVEYS IN CHIPPING NORTON

OCC has carried out HGV surveys in Chipping Norton. These are key to understanding the diversion of HGVs arising from the Burford Weight Limit and to understanding the effect the Burford Weight Limit has on pollution in Chipping Norton. Fig 3 shows those movements of the HGV movements through the town, based on a total of 100% of the HGV traffic on Horsefair. Very few HGVs stop in Chipping Norton or between Chipping Norton and Banbury on the A361.

When the Weight Limit is imposed at Burford the flow represented by the red arrow (23%) in Fig 3 will no longer pass through Chipping Norton

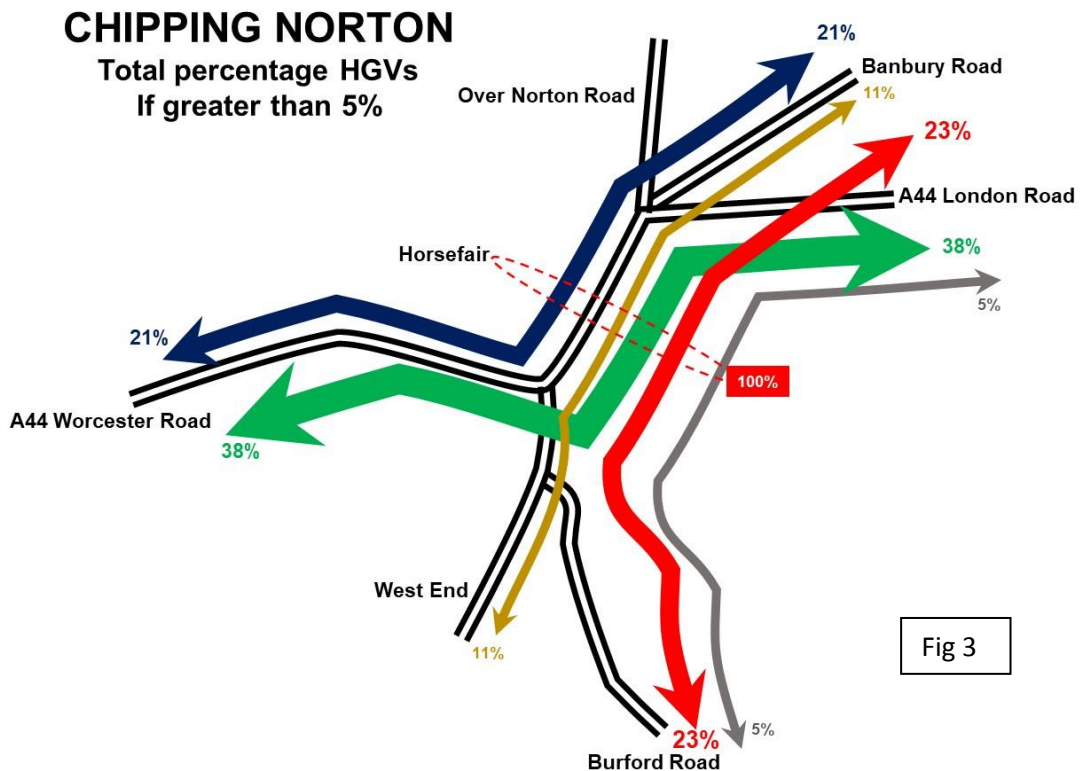


Fig 3

4. COMBINING BURFORD AND CHIPPING NORTON SURVEYS

The surveys show that 85% of the HGVs between Burford and Chipping Norton originate from (or are destined for) Banbury and beyond. This is shown in Fig 4. Furthermore, a large proportion of this movement (60%) passes through Burford to/from Witney and 30% is to/from Swindon. This shows that a high proportion the HGVs on Burford High Street are making the long-distance journey between Banbury (and beyond) and either Witney or Swindon. This has major implications for considering alternative diversion routes later in this response.

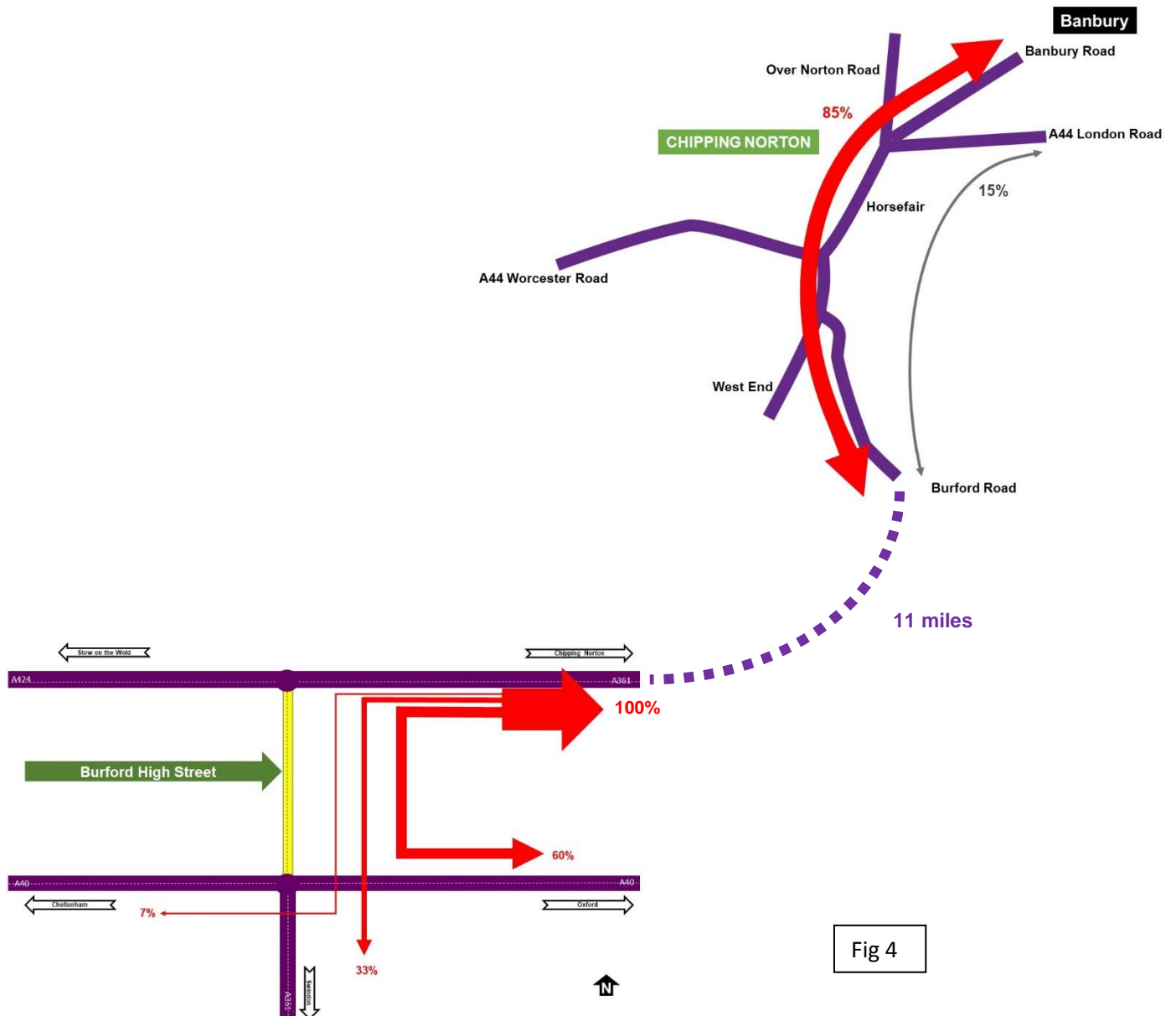


Fig 4

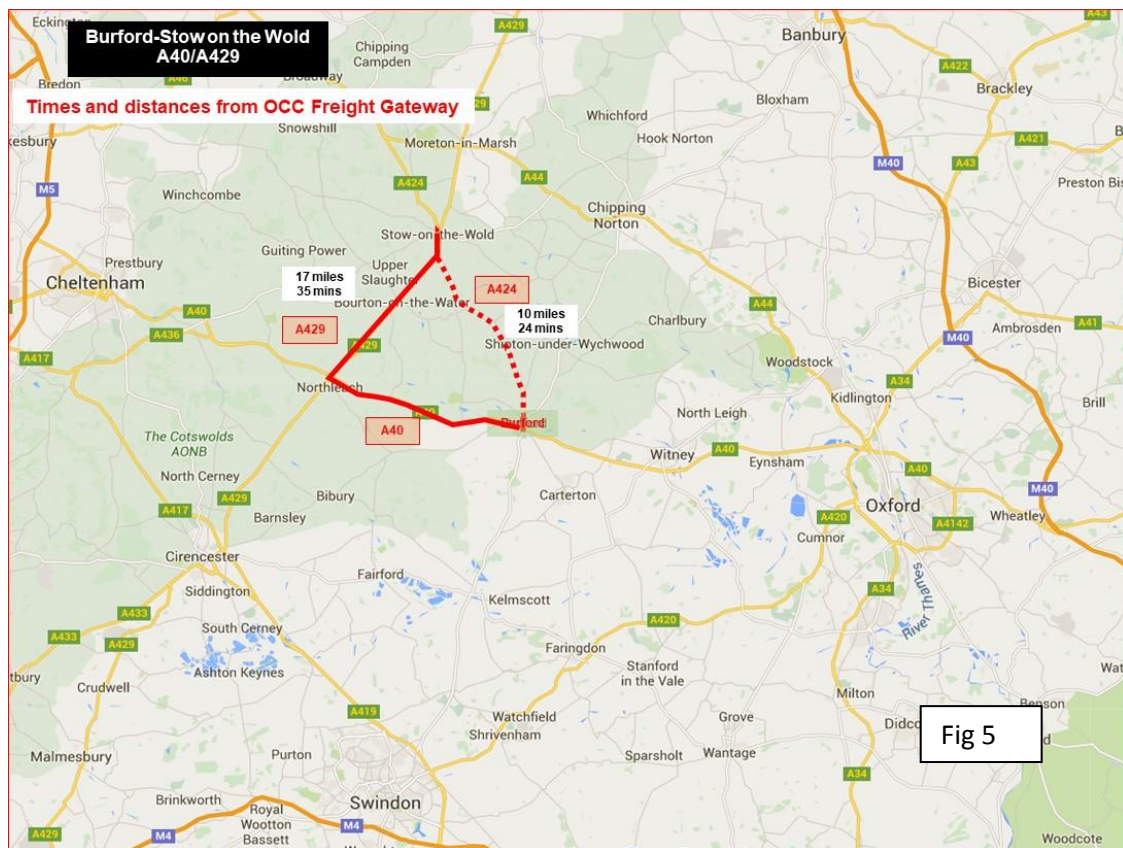
5. FORECAST HGV ROUTES WITH WEIGHT LIMIT INTRODUCTION

A very thorough analysis has been undertaken to forecast which alternative routes HGV drivers will take following the HGV ban on Burford High Street, and to assess the consequent impact elsewhere.

HGV drivers can be expected to follow a route that minimises total operating costs, taking journey time and distance into account subject to route restrictions and OCC Freight Gateway guidance.

A424, Burford-Stow on the Wold

With a weight limit applied at Burford the forecast diversion is via A40/A329 (Fig 5), 7 miles and in theory 11 minutes longer but, in practice, with long delays (up to circa 15 minutes) in Burford due to a single lane C12 bridge it would often have a similar journey time. There is also the Windrush valley on the A424 route and altogether the fuel usage may be similar too. This is the only route available.



At present HGV traffic to Evesham is advised in Oxford and at the A40 Burford roundabout to route via the A40/A429 but most do not do so. BTC understand that Gloucester County Council (GCC) are happy with this diversion.

After the weight limit is imposed no more traffic will go on the A429 past Stow on the Wold than at present

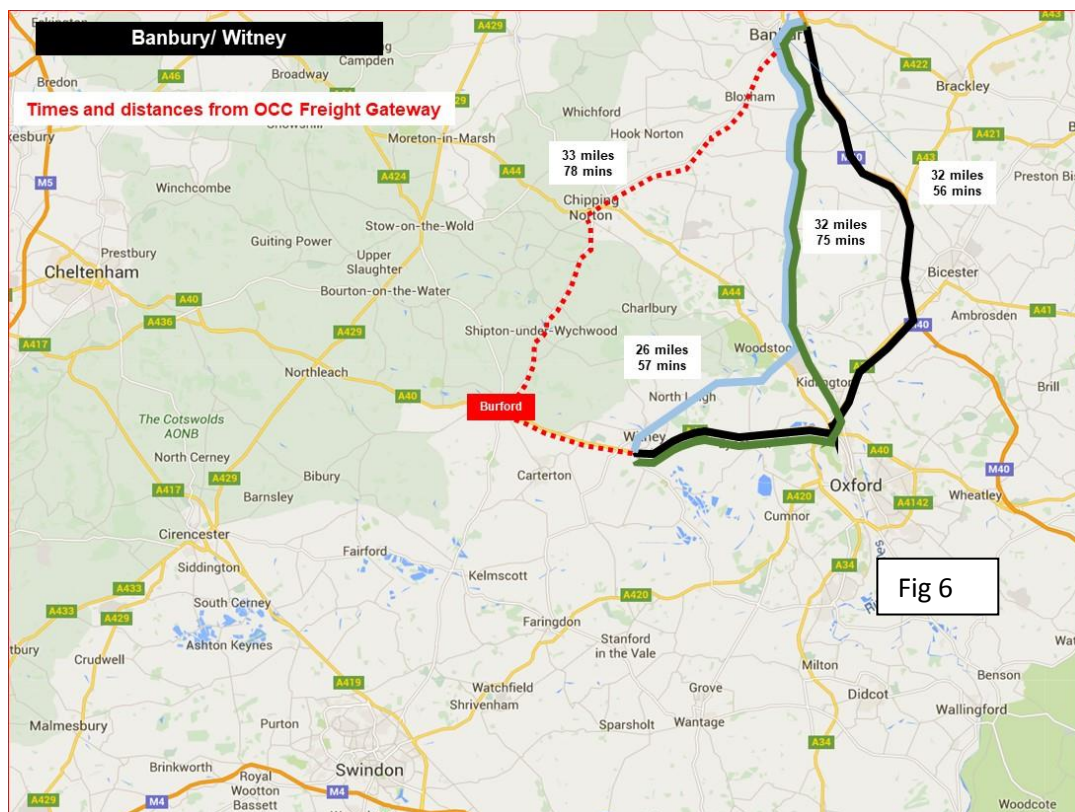
An unsuccessful action has previously been made on the Burford High Street HGV reduction. The OCC-led Freight Quality Partnership (FQP) between OCC, GCC and the haulage industry of 2006 agreed to remove the A361/A424 “rat run” through Burford from the hauliers route map. A very few international hauliers, such as Willi Betz, use the FQP map. The percentage of HGVs involved is minimal and OCC surveys indicate it has had no measureable effect on HGV traffic through Burford.

A361 Burford-Chipping Norton

OCC surveys show that almost no HGVs from Burford terminate in Chipping Norton and almost all go through to/from Banbury (Fig 4). Furthermore, no HGVs to/from Chipping Norton terminate in Burford but go through to/from Witney or Swindon (Fig 1). Thus the relevant diversion routes to examine are between Banbury and Witney and Banbury and Swindon, rather than between Burford and Chipping Norton.

- **Banbury-Witney**

When the Burford Weight limit is imposed for Banbury and Swindon HGV drivers may consider three diversion routes (Fig 6). The M40/A34/A40 route is a similar distance than the current route through Burford and 20 minutes quicker. This route goes through Wolvercote roundabout which has been significantly upgraded to increase capacity over the last two years. The expected increase in HGV traffic flow arising from the Burford Weight limit is insignificant (1%) compared with its normal daily traffic flow.



There is a shorter and quicker route using the A4095 through North Leigh. HGV drivers do not use this route now even though it is 7 miles shorter as it is a winding, circuitous road with restrictions and they must pass through Witney and Banbury with the risk of lengthy delays. This route is already highly discouraged, and is not allowed

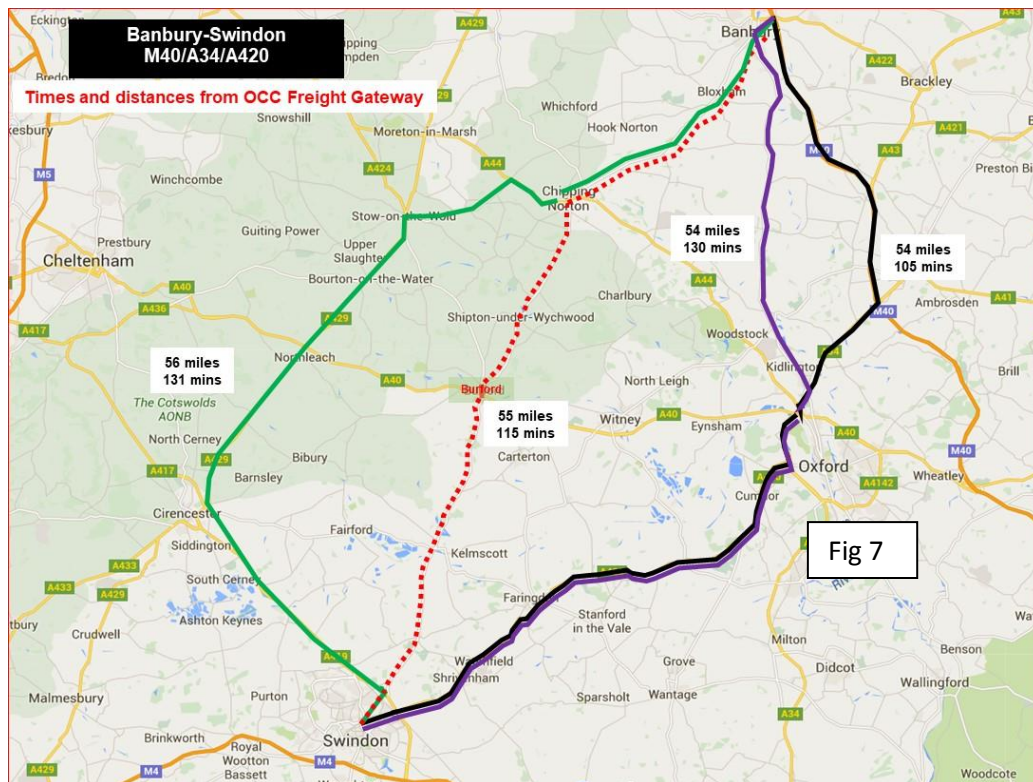
by the OCC Freight Gateway. HGVs are likely to continue to avoid it after the introduction of the Burford weight limit.

HGV drivers will not choose to go via Woodstock on the A44 as the route takes 20 minutes longer than the M40/A34/A40 route, and is no shorter.

- **Banbury-Swindon**

When the HGV weight limit is imposed at Burford HGVs, there would be a choice of diversion routes: via Stow, Deddington and the M40 (Fig 7). The shortest and quickest, by 15 minutes, is by the M40/A34/A320, which is even the same distance and quicker than via Burford today.

HGV traffic will not be diverted through Woodstock as that route is 20 minutes and 3 miles longer than via the motorway.



6. SIGNAGE

Blue signage with no arrows should have the words minimised for ease of quick reading: They should only say 'Weight Limit at Burford High Street A361'. HGV drivers know the roads well and will know the alternative route unless encouragement is needed.

However, specifically additional signage in Banbury (near the motorway junction) and Witney (Bridge Street and B4022/A4095 junction and the A40) should be added to the signage plans to encourage use of the M40/A34/A40 for Banbury/Witney HGV traffic.

7. AIR POLLUTION

West Oxfordshire Air Pollution

Recordings of NO₂ air pollution have been taken in West Oxfordshire by WODC for a decade. The hotspots are shown in Fig 8. Illustrating that Chipping Norton Horsefair is almost 50% above the EU limit and Burford is marginally below.

There is a legal responsibility on HMG, OCC and WODC to reduce the air pollution limit.

WODC states that HGVs make the greatest contribution to the NO₂ level of pollution (65%) even though they constitute only a small percentage (5%) of vehicles.

The air pollution level, measured and averaged 24/7, is just below the safe, legal limit however the primary school is only 25 yds from the High Street. The children use the High Street when most HGVs are present, which raises long term local concern.

Effect of Burford Weight Limit on Air Pollution in Chipping Norton

WODC states that NO₂ pollution from vehicles is decreasing by 2µgm per year due to improved engine design. The latest WODC NO₂ air pollution measurement for Horsefair is 57µgm in 2014, so by 2017 it will be down to 51 µgm, of which HGVs will contribute 33µgm.

After the Burford weight limit, the flow of HGVs on Horsefair will reduce by 28%. The contribution from HGVs will then drop to 24µgm and the total NO₂ air pollution from all vehicles will be approximately 40µgm - at the required EU legal limit, at no cost to OCC.

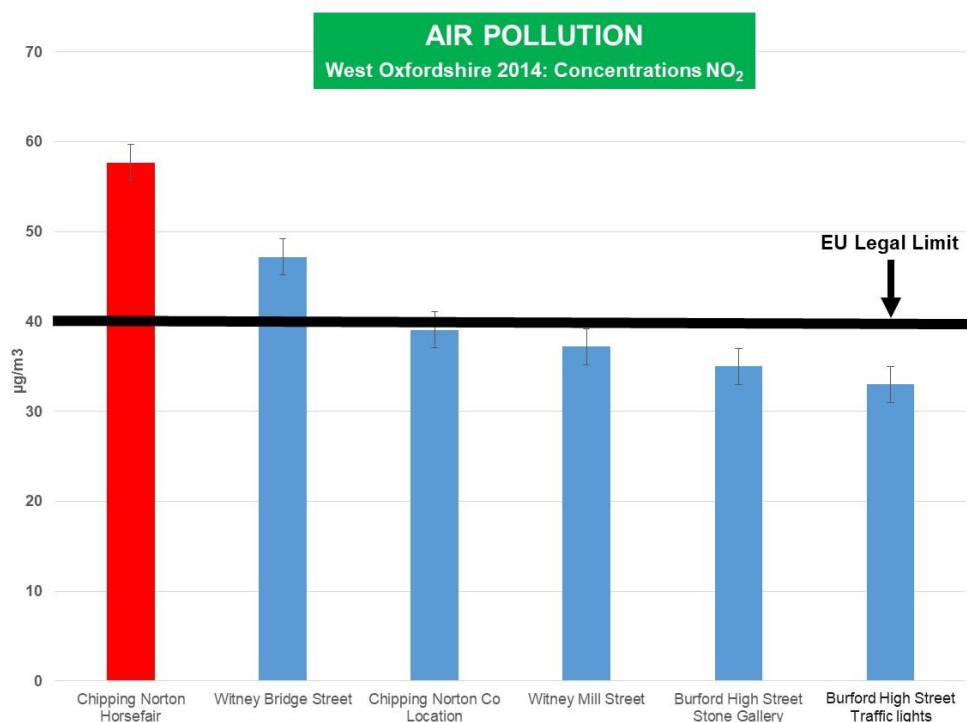


Fig 8

8. IMPACT OF IMPOSING BURFORD WEIGHT LIMIT

On Towns and Villages

Several towns and villages may be affected by an imposition of a weight limit at Burford, and BTC and in part OCC has undertaken the necessary analysis to assess this. Because most HGVs are likely to divert via the A40/A429 or the M40/A34 this impact will be very limited:

- Woodstock is unlikely to be affected at all
- South Newington and Bloxham, who are very concerned about HGVs on the A361 through their villages, are likely to see a drop by of a 40% of HGVs on that road
- Chipping Norton is likely to see a drop by 28% of HGVs on Horsefair, reducing air pollution to the EU limit. This is an AQMA site. The plan for the solution to this problem in 2008 did not consider the Burford Weight limit option.
- Stow on the Wold is likely to see no more traffic on the A429 past the town and no increase of HGVs on the A436
- Fulbrook and Shipton under Wychwood are likely to see removal of most HGVs from the main roads through their villages, but some HGV deliveries will need to follow a longer diversion route
- The A4065 through North Leigh is unlikely to experience an increase in HGV traffic, depending on the effectiveness of the proposed signage in Banbury and Witney
- Witney is not likely to see any change in the number of HGVs

On businesses

Some impact on national and local business is inevitable but will be limited:

- National:
 - Haulage businesses to/from Stow will experience longer journey times and distances and will be inconvenienced. On the OCC website HGVs are advised that Burford 'should be avoided if at all possible' so the weight limit is just making the advice mandatory
 - Most national delivery services are carried out by vans. Occasionally delivery is done by HGVs but the company's systems are used to weight limit inconvenience.
- Local
 - Hickman Bros Landscapes run a local landscape and skip business situated on the A361 near Fulbrook just north of the weight limit area. Their skips have multiple stops including in Burford so, although inconvenienced, would not always be affected.
 - FWP Matthews, an artisan flour miller in Shipton under Wychwood, have occasional HGV traffic which will need to route via Chipping Norton or Stow on the Wold
 - Burford Garden Centre receive goods from every direction. Those from the north will be inconvenienced.

With progress and change there are always those whose activities are impacted. Without action Burford town will suffer; its buildings will continue to deteriorate with the relentless pounding by HGVs and its tourist trade, attracted to the AONB, will continue to be impacted. In Chipping Norton, the air pollution will continue to be above the safe, legal limit.

9. ENFORCEMENT

The Trading Standards section of OCC, which is legally responsible for enforcement, understandably requested that weight limit be limited to Burford High Street and not applied to a wider region, for reasons of difficulty in enforcement with a limited budget.

Burford Town Council has had many discussions with Trading Standards and, as requested, has offered assistance with local planned 'Lorry Watch' activities and Burford's CCTV system which covers all the Hugh Street.

10. COST

Signage comprises the major cost of implementing the Burford environmental weight limit. Burford Town Council which is not financially endowed has (reluctantly) agreed to arrange funding of this cost in principle although there is no history of any other Town, Parish or City Council paying for the signage of any of the other ten weight limit zones in Oxfordshire. The Council will begin a fundraising programme from district, town and parish councils, businesses and residents after final approval and costing of the scheme. The Council have already agreed to pay OCC the legal costs for the TRO.

Burford Town Council has also (reluctantly) agreed in principle to pay for the non-statutory expenses of Trading Standards again where there is no history of this being carried out for any of the other Oxfordshire weight limit zones.

11. CONCLUSION

Burford Town Council most strongly supports the proposed weight limit in Burford High Street.