

WINDRUSH VALLEY TRAFFIC ACTION GROUP

WiVTAG



APPEAL TO OXFORDSHIRE COUNTY COUNCIL

BURFORD A361 EXPERIMENTAL TRAFFIC REGULATION ORDER

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Windrush Valley Traffic Action Group (WiVTAG)

Appeal to Oxfordshire County Council (OCC)

Burford Bridge 7.5t Experimental Traffic Regulation Order (ETRO)

WiVTAG represents 14 parish and town councils, 1 district council, several farms and 51 businesses in Oxfordshire and Gloucestershire. We represent the interests of local communities and businesses that have been affected by the displacement of HGV traffic due to the Burford ETRO. In the short term we are seeking revocation of the Burford ETRO; in the longer term we are offering to cooperate with the relevant authorities to secure a regional solution.

The group includes the following communities, Parish and Town Councils (see appendices for detailed listing of local business, haulage, and farms):

| Oxfordshire | Gloucestershire |
|-----------------------|---------------------|
| Witney | Great Barrington |
| Leafield | Little Barrington |
| Swinbrook & Widford | Moreton in Marsh |
| Hailey | Bourton-on-the-Hill |
| Minster Lovell | |
| Crawley | |
| Woodstock | |
| Enstone | |
| Hanborough | |
| Ascott under Wychwood | |

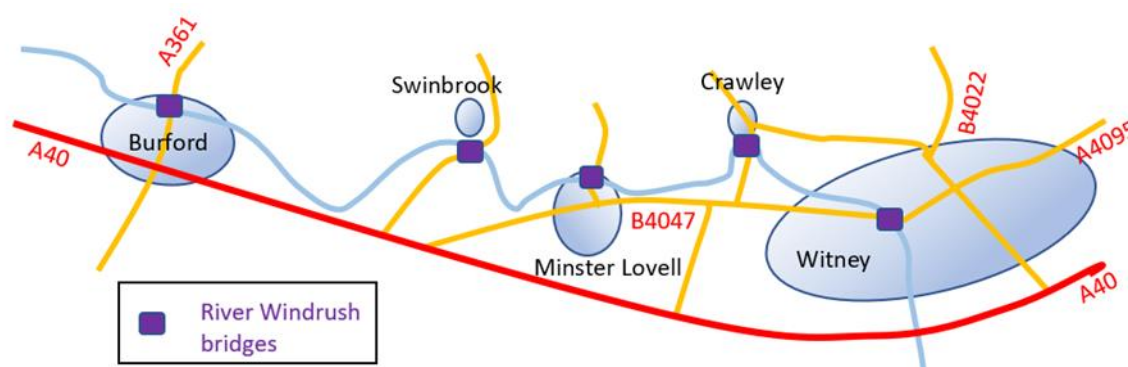


WiVTAG challenges and seeks to constructively support both OCC and Gloucestershire County Council (GCC) in recognising the serious regional, environmental & commercial impact of this experimental weight limit. We urge OCC to revoke the Burford 7.5t Restriction and strengthen the application of relevant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

Introduction

Context

Due to its geographical location, Burford has been a market town for centuries. Developing considerable wealth through trade in wool, leather, and agriculture, in parallel with associated commerce, hospitality and latterly tourism, the town has been a vital local hub for many small rural communities. As this trade and regional pace of commerce has developed and increased, so inevitably has the volume and weight of traffic, most especially because it remains a town offering a crossing over the River Windrush. The A361 (Burford High Street) is the only A-road in this area with a reinforced bridge over the river and therefore one of the few safe crossings.



WiVTAG's appeal to OCC This appeal document is based on a comprehensive review and objective assessment of key factors, issues, and serious local concerns, some of which were identified in our Interim Report presented to the officers of OCC on 22 April 2021.

In the appeal, WiVTAG includes three major areas of concern:

1. The overall detrimental effect of Burford's ETRO was under-estimated:

- Traffic blockages and infrastructure damage caused by diversions onto lower category routes.
- Impact and commercial damage to *haulage and transport* businesses.
- Isolation of *farming businesses*, severely impacting deliveries, and sales.
- Negative impact on air quality in already Air Quality Management Area- (AQMA)affected communities.



2. The criteria for Performance Measures, as defined by Burford, lacked scope and definition to address all the concerns listed by Burford in their application for a weight restriction, and did not recognise or measure the wider effects in the region.

3. The policies and strategies in OCC's LTP were not fully applied to determine the outcome of the ETRO application. In our view, the OCC LTP provided sufficient justification to deny approval.

We then suggest three opportunities for the development of a regional solution.

4. OCC and GCC are encouraged to work proactively with the *haulage and transport industry* using guidance set out in their own *Local Transport Plans*.

5. All communities (irrespective of their size) are encouraged to recognise that there is a legitimate need for them to accommodate some level of HGV traffic.
6. All communities are encouraged to accept that *combative, protectionist, NIMBY responses* are not appropriate and will not offer a solution.

WiVTAG’s conclusion is that approval of the ETRO in Burford must be revoked at the earliest opportunity and that OCC could take this opportunity to work with communities and hauliers to develop a better, regional solution.

Fundamental Principles

Documented pressure to enact a Burford ETRO can be seen in the Town Council’s and residents’ concern over ‘*noise, vibration, air pollution and road safety issues associated with heavy lorries*’ (OCC Report CMDE4 2019/090). As demonstrated by the UK’s population of all ages, the decision to reside in, rent or purchase a property is a lifestyle choice based in part on an assessment of the following principle and often opposing factors (<https://movehomefaster.co.uk/blog/article/country-living-vs-urban-living-pros-and-cons/>):

| Urban/Town | | Rural/Village | |
|------------------------|---------------------|-------------------|-----------------------|
| <i>Advantage</i> | <i>Disadvantage</i> | <i>Advantage</i> | <i>Disadvantage</i> |
| Access to amenities | Noise/vibration | Peace & quiet | Isolation |
| Transport & roads | Pollution | Independence | Distance to amenities |
| Live, active community | Lack of privacy | Space & wellbeing | Limited transport |
| Security & support | Lack of space | Privacy | Lack of security |

WiVTAG contends that the Council and residents of an historic, active market town on an important regional A-road cannot expect the benefits of urban living, while also demanding the advantages of a rural lifestyle. OCC’s support of these unrealistic expectations, through the arbitrary implementation of an ETRO, lies at the root of this appeal.

The criteria for success were set up such that mere displacement of traffic was to be regarded as successful, which in itself was not a properly rigorous way of assessing the effect of the scheme. WiVTAG submits that the essential flaw in the scheme is that it fails to consider the overall effect of the policy outside the narrow area which it benefits, and that that is not a fair or rational approach to traffic planning.

Sections 1, 2 and 3 explain WiVTAG’s major areas of concern in the original justification and approval of the Burford scheme.

1. Overall detrimental effect of the scheme

1.1 Major Routes

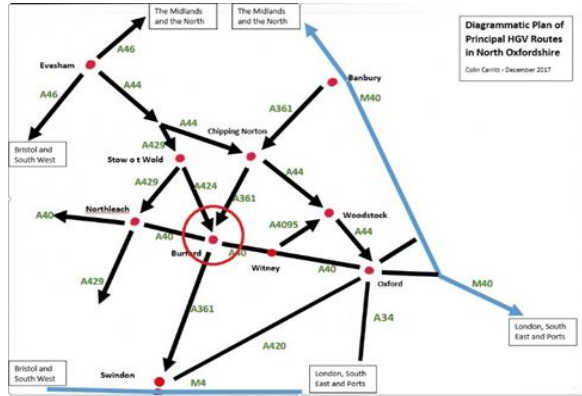
The regional impact of this arbitrary, experimental 7.5t traffic ban was never fully assessed and is likely to have been at the very least under-estimated. Consequently, the estimated 400-600 HGVs transiting through Burford daily, confronted by the ETRO weight limit since August 2020, have been forced 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, is also a substantial freight carrier route for HGVs from Evesham and its multiple distribution centres to London and the south-east ports.

The Evesham area generates large tonnages of freight from the fruit and vegetable growers in the district, as well as manufacturers, such as Unipart and others. The restriction in Burford has displaced almost all this traffic to the A44 through Moreton-in-Marsh/Chipping Norton/Woodstock.



1.2 Alternative North-South Routes

The alternative long-haul routes offered by the OCC and GCC Highways Authorities are the westbound A40 to Northleach route, with an impossibly tight roundabout at its junction with A429, and the eastbound A40 to Witney which officially imposes a 17-mile barrier to crossing the river. This is unworkable and inefficient, with frequently heavy congestion and time/cost consuming delays (see Appendix F for detailed analysis).



1.3 Damage and Congestion

Since the Burford weight restriction, local and increasingly international HGV traffic is now using unsuitable alternative routes through the neighbouring, single lane villages. These small communities (50-300 dwellings) are seeing an increase in HGV traffic, often in breach of existing 7.5t TROs, leading initially to serious congestion as the heavy traffic seeks to navigate bridges or junctions.

The attached Appendix A includes:

- Thames Valley Police formal objection, submitted to OCC during the initial representation (Sep 2017)
- Pictorial evidence of the:
 - Damage to the highways' infrastructure and the impact on property
 - Congestion and the perception of increased danger, particularly to vulnerable road users and pedestrians.

1.4 Haulage and Transport

WiVTAG's campaign includes active contact with 51 Hauliers (see Appendix B) whose replies to our online survey have proved the following overriding, detrimental effects of the ETRO:

- Higher costs
- Extra mileage
- Extra driver time
- Enforced use of unsuitable roads.
- Anti-competitive effects due to the Burford permit scheme
- Loss of business
- Damage to the environment



CO₂ Consequence of the Extra Mileage In the reports received and collated in Appendix B, a typical average increase to avoid Burford is 20km. In the recent OCC report, Burford is experiencing 119 fewer >3 Axle-HGVs a day.

Assuming the reliable accuracy of the data supplied by the 51 Hauliers and extending that scenario: 119 HGVs travelling an extra 20km, the estimated additional distance over a year is more than 680,680 km (approximately 17 circuits of the globe):

$$119 \text{ HGVs} \times 20\text{km} \times 5.5 \text{ days} \times 52 \text{ weeks} = 680,680 \text{ extra km/year}$$



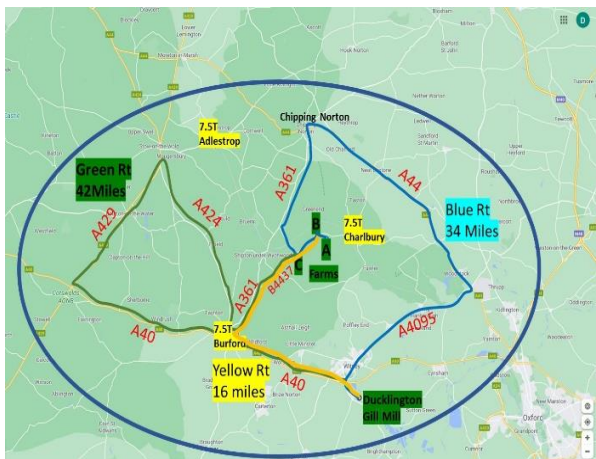
This broad estimate of an increase in HGV mileage suggests a significant environmental and commercial impact and will increase physical damage to highway infrastructure and thus repair costs. Reversing the Burford ETRO would have an immediate and positive impact on the County's aspiration to be carbon neutral by 2030.

The hauliers, most of whom are based within 32km of Burford, have confirmed that the Burford weight restriction is causing them to pass additional costs onto customers. Furthermore, the current Burford Town Council policy of granting access permits to companies within 4.8 miles of the town has caused unfair competition. Haulier companies support the local economy and are essential to local services (home fuel, building supplies, sewage waste, farming, food, construction). WiVTAG believes that a comprehensive assessment of these additional costs to the local economy was not included in the considerations given to the Burford ETRO, nor was the impact of extra mileage on the environment. Any regional solution should draw on the expertise and experience of HGV operators to understand their needs, which in turn helps the wider community they serve and ultimately the environment.

A list of the 51 HGV companies, route maps, statements and further details are described in Appendix B.

1.5 Farming

Burford, an agricultural hub, market, and trading town for centuries, sits at the heart of an active arable, livestock (predominantly sheep and cattle) and forestry farming area. The Cotswold and North Oxfordshire small and large farming estates have grown through acquisition or contract farming, owning, or managing land North and South of the River Windrush. These farms are dependent on heavy haulage for supplies and machinery, and crucially, the movement of livestock, grain, straw, hay and wood to clients or regional, national, and international markets. While the small, neighbouring



rural communities continue to give priority to tractors and farm machinery, their small, narrow bridges and minor roads cannot cope with these increasingly large farm vehicles.

Recent applications and correspondence with Burford Town Council have proved that, despite public assurances, many of the farms are not eligible for a permit through Burford, leaving them effectively 'marooned' in the middle of a small number of 'local/minor road islands' within 20-30 miles of Burford.

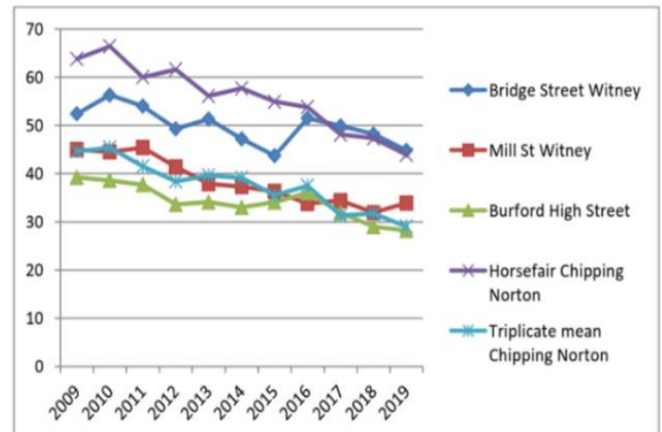
A high-level analysis of the data and serious commercial/operational impacts on local farming, explained in the attached Appendix C, shows that the negative impacts of this ETRO on this key local industry were grossly under-estimated.

1.6 Impact on Air Quality and Vibration due to Traffic

Air Quality Management remains, both nationally and within OCC, an important target for improvement within internationally recognised environmental standards.

WiVTAG is alarmed to note that, in contradiction to established OCC policy, the Burford ETRO has effectively diverted HGV traffic from one of the 'healthier' towns in the County to two areas where the air quality is already above the national set limit.

WiVTAG would also encourage a further analysis of the claims of damage due to traffic induced vibration. Details of these elements of our appeal are described in Appendix D.



2. Performance measures

2.1 Performance Criteria

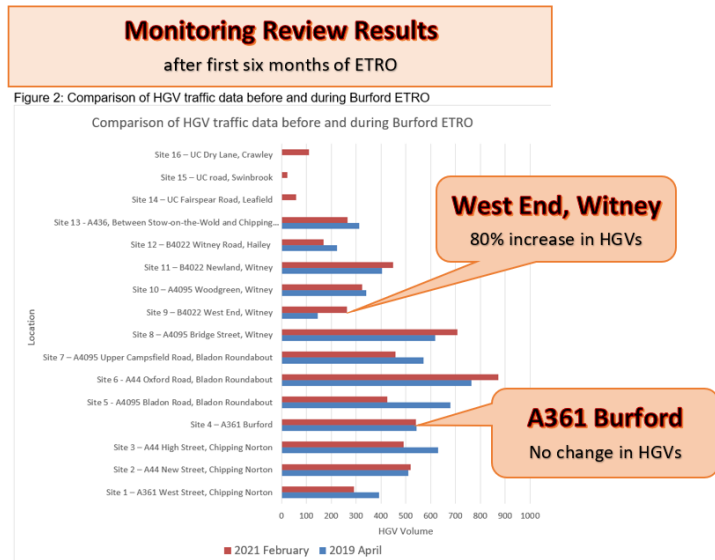
- A fundamental requirement in any study is to clearly predefine the criteria that will be used to measure performance and judge success or failure. With pre-defined criteria, data can be gathered and applied with confidence.
- Individuals may work backwards from available data to define additional performance measures. This approach is referred to in academic circles as “data mining” and is open to bias.
- In the application for the Burford ETRO, the “evaluation and success criteria” were defined as *“A decrease in HGVs on Burford High Street of 50% or greater would be considered a positive impact. An increase in HGVs on other roads (specifically in Chipping Norton, Witney, and Woodstock) greater than 50% would be considered a negative impact.”*
- It is easy to understand why Burford would see these measures as successes. It is difficult to comprehend why any other community could be expected to accept a commensurate increase in HGVs through their town or village of up to 50% as a success.
- An additional performance measure was defined in relation to a potential negative impact on air quality in the Air Quality Management Areas at Witney and Chipping Norton. Our comments on this are included in Section 1.6 and Appendix D of this appeal.
- In their ETRO application, Burford listed concerns about noise, vibration, air pollution and road safety issues associated with lorry traffic as well as the negative impact on the town's tourist economy as the reasons for their application. However, no performance criteria were proposed by OCC for any of these issues.
- Monitoring sites were limited to six locations on Oxfordshire’s main road network and failed to include any monitoring of traffic on local roads and in Oxfordshire communities near Burford, on the main roads in Gloucestershire or in any of the neighbouring Gloucestershire villages.

WiVTAG’s concerns about the scope and definition of the performance criteria are explained in more detail in Appendix E. Our view remains that the criteria specified in the Burford ETRO were not fit for purpose.

2.2 Performance Measures

OCC has completed traffic monitoring after the first six months of the ETRO and has reported its findings:

- HGV numbers in Burford have not changed (542 before and 541 during), but HGV numbers in West End in Witney have increased by 80% (145 before and 262 during). OCC therefore concluded that the scheme has failed to meet either measure. WiVTAG agrees with this conclusion.
- The OCC report includes a breakdown of the traffic counts that might encourage some “data mining” by others in an attempt to present the ETRO as a success. Such an approach is open to bias.
- Notwithstanding this, there was an apparent reduction in 5-axle HGVs through Burford (from 81 to 18 daily), suggesting that national and regional hauliers have changed their routes. There was also an increase in 2-axle HGVs (from 329 to 447), suggesting that local hauliers are changing the size of vehicles to work around the ETRO restrictions. From Burford’s point of view, both changes would be successes. To other communities and haulage companies in our survey, they represent failures. 5-axle HGVs diverted from Burford must find alternative routes and are causing severe problems on the lower-class roads that they are forced to use in neighbouring communities. Additionally, the use of smaller vehicles is cited by many local hauliers as uneconomic and environmentally damaging.



3. Current County Council Local Transport Plan

In the first instance, WiVTAG sought direction, clarification, and justification for OCC’s actions in the county’s own LTP. WiVTAG fully agrees with and supports the application of the list of relevant OCC policies and strategies for good management of freight traffic within and through the county.

However, we were disappointed to discover that the policy statements are in many cases in direct contradiction with the decision for Burford’s ETRO to proceed.



WiVTAG's position is that OCC had ample justification to reject Burford's ETRO application on the grounds that it conflicted with many of the policies and strategies set out in their LTP. An opportunity to apply good practice and to protect infrastructure, businesses and residents was lost. Instead, the approval of the ETRO has created or aggravated problems with inappropriate routing of HGVs.

A detailed analysis of current OCC policy is attached as Appendix F.

Sections 4, 5 and 6 recommend opportunities for an alternative approach – a regional solution for a regional problem.

4. Working proactively with the Haulage and Transport Industry

WiVTAG is encouraged by the OCC opportunities presented and policies published to assist haulage operators in planning their routes, including:

- OCC's LTP defining the initial building blocks for freight management within the region.
- In particular, the Oxfordshire Lorry Route Map and the OCC Roads Hierarchy Table providing all the essential guidance for use of the most appropriate and capable roads for transport in the region (both of these are reproduced in full in Appendix F).
- A National Freight Journey Planner enabling National and International route planning.

WiVTAG's market research with local freight operators (as detailed in Appendix B) has also highlighted the willingness of the extremely safety conscious operators to avoid using minor roads and to maximise the use of the strategic road network.

All of the above are handicapped by the introduction of arbitrary weight restrictions on key elements of the road network. A failure in one part then has effects on the wider region. WiVTAG is confident that, following our extensive liaison with the regional haulage and transport industry, OCC's comprehensive, consequential application of its own policies would lead to an effective, industry supported regional solution.

5. Change to Community Attitudes

WiVTAG accepts that population growth and living-standard expectations demand increased road usage. We also sense and would encourage a greater tolerance of heavy traffic, as is the case for farm traffic, amidst the WiVTAG community to enable access to local services and the commercial activity of local industry. This developing and constantly evolving situation requires a mutual understanding and respect of mitigating measures, balancing the established limitations of the road network with appropriate speed and traffic management systems. This will only be achieved if all communities (irrespective of their size) recognise the legitimate need for the accommodation of some level of HGV traffic.



In tandem with greater tolerance of farming, transport, and haulage, a regional approach would permit:

- Safe transit of international/national traffic (motorways and A-road network)
- Effective, efficient networks for local businesses and farms (local road network)
- Agricultural supply and delivery (local road network to support the legitimate access of seasonal, critical but minimal haulage of produce, supplies and machinery).

In line with the above, communities could retain the freedom to present objective cases to their local Councils and Traffic Departments based on safety, road limitations and environmental issues, for speed limit or traffic management measures.

6. Combative, protective, NIMBY solutions do not work.



The WiVTAG community accepts completely that Burford Town Council has acted in the best interests of its resident community and historic property. However, the current situation risks similar, community driven protective action by the neighbouring Oxfordshire and Gloucestershire town and parish councils. The consequence of such actions will almost certainly result in an increase to local government workload, combined with additional police and national highways engagement to enforce and limit the flow of traffic through restrictions; it will not resolve the essential regional traffic flow problems.

WiVTAG encourages and would support our local County authorities in any regional plan that works to meet the best interests of the entire residential, commercial, and indeed transiting community of road users.

7. Conclusion

WiVTAG represents a growing local commercial and residential community. Our motivation is the need to resolve the tension between the demands of residents for the quiet enjoyment of their homes and communities, and the essential business needs for the movement of consumer goods, materials and supplies, and agricultural transport. We want to see this resolved in ways that ensure public safety, the protection of our world-renowned countryside, and without excessive costs.

To achieve this, we see the first step as the earliest revocation of the Burford ETRO for the following reasons:

- This document and its appendices have demonstrated the overall detrimental effect on the wider communities of Oxfordshire and Gloucestershire of the Burford weight limit scheme.
- Prior to implementation, there was no proper assessment of the logistics and deployment of international, national, regional, and local freight traffic across and within Oxfordshire and Gloucestershire.
- OCC has underestimated the impact of the scheme on local communities, farms, and businesses.
- We have shown that the criteria used for performance measures of the Burford ETRO are not fit for purpose and do not reflect the effects of the Burford weight limit on the Council's policy to reduce transport carbon emissions, improve air quality and sustain local business vitality. These and other damaging effects of the Burford ETRO clearly go against the spirit (and sometimes the letter) of the County's LTP. Those policies are, inter alia, intended to protect rural communities from heavy traffic.
- Our Appeal Document and appendices point to the need for the Council to work proactively with businesses and other local authorities, and to draw on the undoubted experience of national and



local haulage operators and the regional farming community in the revision and development of the LTP.

- We conclude that all communities, including Burford, need to accept an appropriate level of HGV traffic, determined by the category, condition and grading of their local road network. Impacts can be mitigated with effective traffic management systems to ensure road safety, protection of historic property and the environment. Weight restrictions should be approved only where the adequacy of highway infrastructure requires protection and not as a convenient back door mechanism for communities to defend their patch. Combative, protectionist, NIMBY solutions do not work.

WiVTAG challenges and seeks to constructively support both OCC and Gloucestershire County Council (GCC) in recognising the serious regional, environmental & commercial 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

WiVTAG

Windrush Valley Traffic Action Group

Committee Members:

Deborah Triff – Leaffield Resident
Gina Pearce – Chair of Leaffield 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

Town and Parish Council Supporters:

Witney Town Council
Woodstock Town Council
Moreton-in-Marsh Town Council
Ascott-under-Wychwood Parish Council
Enstone Parish Council
Swinbrook & Widford Parish Council
Hailey Parish Council
Crawley Parish Council
Leaffield Parish Council
Hanborough Parish Council
Barrington Parish Council
Bourton on the Hill Parish Council
Minster Lovell Parish Council

Appendices:

- A. Appendix A – Detrimental Effect on Neighbouring Communities
- B. Appendix B – Haulage and Transport
- C. Appendix C – Farming
- D. Appendix D – Impact on Air Quality
- E. Appendix E – Criteria for Performance Measures
- F. Appendix F – Current County Council Local Transport Plan

Appendix A – Detrimental Effect on Neighbouring Communities

Introduction If the damage being done to Burford High Street was justification for the implementation of the weight limit, it is but small compared to the same being experienced in the neighbouring Oxfordshire and Gloucestershire villages. Verges, footpaths, bridges, drains and culverts are being damaged, while pedestrians, heavy commercial, car, and bicycle traffic attempt to find space on the narrow lanes.

This appendix includes a copy of the formal letter submitted by the Joint Operations Unit, Thames Valley Police on 17 Sep 2017, objecting to the Burford ETRO based on its regional impact.

In addition, this appendix presents photographic evidence of the HGV traffic forced to use the roads in neighbouring communities.

**Thames Valley Police, Joint Operations Unit, Traffic Management Unit
Formal Objection to Burford ETRO (September 2017)**



Thames Valley Police Hampshire JOU

*Traffic Management Unit
Strategic Roads
Howes Lane
Bicester
Oxon
OX15 ONX
13th September 2017*

Ref: A361 Burford 7.5t weight restriction-Traffic Regulation Order

To: Oxfordshire County Council

This formal letter is in response to consultation from Oxfordshire County Council.

The contents of the documents with research work that has so far been captured by engineers and officers at the Highway Authority are understood and taken into account in this response.

History

Attendance at Highway and Council meetings since on this unit in 1997 has occasionally been the platform for consideration to weight limits on A class Principal routes. To my knowledge this so far has not been fully developed instead being tackled by informal advisory direction route signing. Restrictions in the context of this proposal have always been something Police have resisted on road safety environmental and enforcement grounds, which continue to be upheld in this instance. In general Police policy to weight restrictions

is and remains a very low priority especially environmental limits which I have established this proposal is.

Consultation

A request for further information has established a firm desire by the Highway Authority to wholly supervise the restriction using (Trading Standards -CCTV). The limit of the restriction is through the town High Street from the A40 roundabout to the A424 Stowe junction over the river bridge at Fulbrook. These locations will require detailed and unambiguous restriction with alternative route signing including exemptions for access in the town appropriately.

It is likely that some drivers may risk prosecution either due to potential or punitive fine levels set against fuel costs which are significant for larger goods vehicles. Others using SAT NAV or other direction may find themselves past the entry point and then attempting high risk turning manoeuvres in confined space with vulnerable users.

The length of alternative routes is outlined, and routes identified some already being congested with significant additional distance. This must be a factor where those promoting the restriction should consider displacement onto other roads that do not have 'A' class character.

It is imperative that organizations such as Freight Transport and Road Haulage Association are fully engaged in this process together with local haulage and commercial enterprise that may be economically affected.

Conclusions

Notwithstanding the intended removal of direct imposition of an enforcement burden on Police the indirect implications that follow in the wake of this could be very significant. Heavy Goods Vehicle traffic displacement onto lesser class of roads is highly likely in our view something that could lead to further restrictions that then come onto Police for supervision! Any enforcement in this context is exceptionally onerous as a patrol officer. Continuous visual contact and have to follow any potential offending vehicle through the complete length of the restriction to eliminate exemptions and evidence towards a successful conviction.

Road safety must be a strong consideration in this plan with other communities potentially taking some or all of this traffic with all the environmental implications that go with it.

This response identifies several specific areas in evidence to our response which can be considered together with the general acceptance of our desire to Police by 'consent'. This rather than the requirement for continual and long-term supervision by the Highway Authority or indirectly Police in any circumstances.

The A361 carries A class road character and passes through several other towns, this example in Burford with others in the county could set an unwelcome precedence in the same context.

We understand the nature history and local desire to remove heavy goods vehicles from Burford. Consideration of a restricting to this class of traffic without an acceptable and

sustainable safe and shorter alternative route to those affected will be very controversial on many levels.

In conclusion Thames Valley Police formally OBJECT to the proposal on the grounds outlined in this report.

John Croxton MIHE

For Supt Roads Policing

Increase of HGVs in Villages

Villages, Minor Roads, Lanes and Rural Areas (Oxfordshire and Gloucestershire)

Road edges, aged drainage systems, soft grass verges, bridges, culverts, drains, underground utilities, and fragile kerbs damaged by heavy, wide HGVs:







Road Edges, Culverts and Bridges:







Villages, Minor Roads, Lanes and Rural Areas (Oxfordshire and Gloucestershire)

Traffic obstruction being caused by HGVs transiting, or attempting to pass on single track roads and lanes:



Conclusion



Barford bridge, on an unclassified road in North Oxfordshire has been closed to all traffic because of damage to a stone river bridge caused by excessive HGV use. WiVTAG contends that this is an example of precisely the expensive damage to similar unclassified roads and bridges that we risk in our communities if HGVs continue to use inappropriate routes as diversions from the A361 in Burford.

Appendix B – Negative Impact on Haulage and Transport

Haulage & Transport

Contents:

- Introduction
- 51 haulage & transport companies affected by the Burford restriction.
- WiVTAG Survey – river crossings
- Anti-competitive effects caused by the Burford Permit Scheme
- Haulage and transport testimonies
- Examples of how hauliers have been affected by the Burford restriction.
- Some more direct quotes from the WiVTAG survey
- Case Study – Leafield, May 17 and May 19, 2021
- Conclusion

Introduction

WiVTAG recognises that an understanding of the Haulage & Transport network, and its commercial/contractual commitment to the community is critical. As the industry most affected by the Burford weight restriction, it is considered essential to represent in detail the challenges faced by this vital sector.

51 haulage & transport companies affected by the Burford restriction.

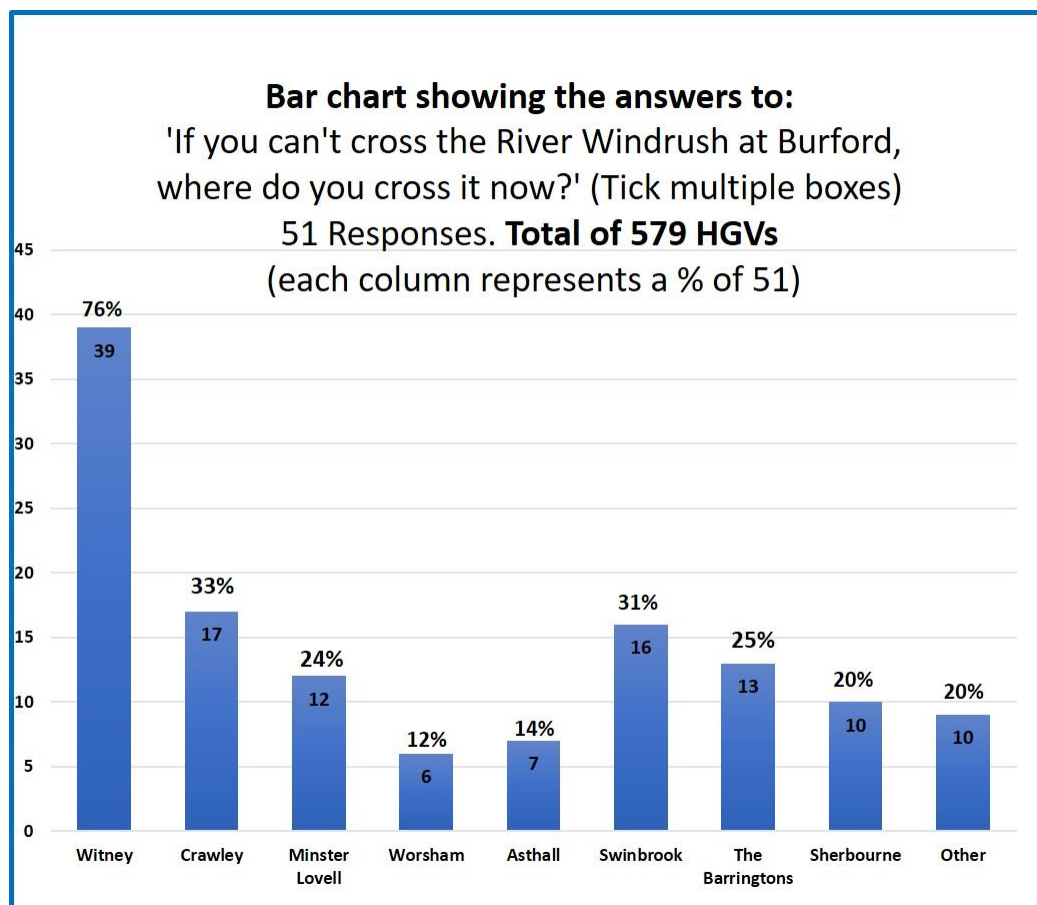
WiVTAG includes 51 regional and local HGV Companies. The following 51 Companies with a total of 579 HGVs, confirmed in an online survey *'that the Burford weight limit restriction has a negative effect on their business'*.

| | Company Name | Location | Type of Business | HGV Fleet |
|----|--------------------------------|------------------|---|------------------|
| 1 | D&M Plant Hire Ltd | Stanton Harcourt | Construction | 7 |
| 2 | Encon Insulation | Stanton Harcourt | Distribution | 5 |
| 3 | The Landscape Centre | Witney | Grab loader hire, waste transfer & supplier of aggregates | 3 |
| 4 | Hayes Tipper Hire Oxford | Carterton | Haulage plant hire construction | 5 |
| 5 | Minster Paving | Standlake | Paving manufacturer | 2 |
| 6 | Micks Skips | Minster Lovell | Waste disposal | 5 |
| 7 | TWE Haulage Ltd | Banbury | Logistics | 26 |
| 8 | Witney Plant Hire Ltd | Witney | Plant hire company | 16 |
| 9 | JLP Haulage Ltd | Witney | Haulage for the building trade | 16 |
| 10 | A M Robey Haulage | Brize Norton | Haulage | 2 |
| 11 | Robeyone Tipper Hire | Brize Norton | Haulage of aggregates | 1 |
| 12 | Crockett Haulage Ltd | Freeland | Tipper and grab hire/haulage | 12 |
| 13 | Barry Jeffrey Transport ltd | Mickleton | Haulage company | 6 |
| 14 | Ducker & Young Scaffolding Ltd | Witney | Scaffolding company | 2 |
| 15 | M J Cox | Challow Station | Haulage (daily contract for Smiths of Bletchington) | 5 |
| 16 | Chris Hayter (Transport) Ltd | Witney | Transport and warehousing | 116 |

| | | | | |
|----|--|-----------------------------------|--|------------|
| 17 | AE Gough & Sons | Llandrindod Wells | Haulage contractors | 34 |
| 18 | Earthline Ltd | Wroughton and Oxon generally | Movement of aggregates and muck | 70 |
| 19 | Adstock Bulk Solutions Limited | Milton Keynes | Bulk agricultural haulage | 20 |
| 20 | 5A's Tool & Plant Hire | Brize Norton | Tool & plant hire | 3 |
| 21 | R D Benson Ltd | Wotton Under Edge Gloucestershire | Road haulage | 5 |
| 22 | Thames Liquid Waste Disposal | Cassington, Witney | Sewage removal - mainly domestic | 1 |
| 23 | WHC Hire Services Ltd | Chipping Norton | Tool & plant hire | 2 |
| 24 | Tubes Scaffolding Oxford | Abingdon | Scaffolding and construction | 4 |
| 25 | SCB Oxford Ltd | Frilford / Abingdon | Movement of aggregates and muck | 11 |
| 26 | Betts Transport Services | Chadlington | National and international haulage plus cardboard/ polystyrene recycling | 2 |
| 27 | KJ Millard Ltd | Chipping Norton | Skip hire | 7 |
| 28 | Cotswold Carriers | Kingham, Oxon | Household removals / transport | 4 |
| 29 | Alford Pallet Recycling | Lew, Bampton | Pallet distribution | 5 |
| 30 | D.C. Griffin Transport | Kingham, Oxon | Haulage | 2 |
| 31 | Deddington Liquid Waste Disposal Ltd | Woodford Halse, Banbury | Banbury sewage disposal | 4 |
| 32 | Cotswold forage | Icomb | Icomb Farming and haulage | 5 |
| 33 | BA Hull Ltd | Lower Lemington, Moreton in Marsh | Ground works, drainage, drilling, and civils | 3 |
| 34 | Gaden Logistics Ltd | Stow on the Wold, Upper Oddington | Hay & straw merchant - farmer and haulier | 6 |
| 35 | Mike Houlton Transport | Fairford, Gloucestershire | Road transport | 1 |
| 36 | AL Wilkinson Farm | Barnard Gate, nr Witney | Farming and haulage | 2 |
| 37 | Rupert Cole Transport | Filkins | Haulage | 1 |
| 38 | Banbury Plant Hire | Hook Norton | Plant hire, waste recycling, builders' merchant | 15 |
| 39 | Levelgrade (oxford) Ltd | Witney | Haulage | 1 |
| 40 | SG Harris Groundworks Ltd | Chipping Norton | Construction industry | 1 |
| 41 | Jason Gillett Groundworks Ltd | Chipping Norton | Groundworks and civils contractor | 2 |
| 42 | Ramthorne Concrete | Hook Norton | Pre-mix concrete | 4 |
| 43 | S Peet Groundworks Ltd | Chadlington | Groundworks and haulage | 4 |
| 44 | A. W. Cleaver Haulage Ltd | Stanton Harcourt | Haulage | 19 |
| 45 | Spiers & Hartwell Ltd | Near Evesham | Transport logistics | 55 |
| 46 | L A Lockhart Plant Hire Ltd | Bampton | Plant hire and haulage | 15 |
| 47 | NAP Gab Hire Ltd | Southmoor | Movement of aggregates & muck | 14 |
| 48 | Stobart Haulage Ltd | Chipping Norton | Road haulage | 5 |
| 49 | CP Seviles T/A Witney Grab Hire | Hailey, Witney | Inert construction waste transfer/ aggregate delivery | 1 |
| 50 | Hughes & Salvidge Ltd T/A Aasvogel Skip Hire | Wantage | Skip hire | 18 |
| 51 | The Breedon Group | Naunton | Quarry | 4 |
| | | | Total of HGVs | 579 |

WiVTAG Survey – River Crossings

WiVTAG designed a simple 5-question, multiple-choice survey to gather data regarding site of river crossings by HGVs since the Burford closure. Data confirmed local HGV companies, none of which are eligible for the Burford permit scheme, were dependent on the Burford bridge for access to businesses and sites. The current situation leaves them little option but to use the narrow roads through Witney, Crawley, Hailey, Leafield, Swinbrook, Minster Lovell and the Barringtons to go north/south of the River Windrush.



Anti-competitive effects caused by the Burford Permit Scheme

The Burford Permit Scheme is for businesses within a 4.8-mile radius of Burford and the journey must start and finish within that radius – as per email from Mr White the Ex-Burford Town Mayor, Feb 2021:

BURFORD HGV WEIGHT RESTRICTION EXEMPTION PERMIT APPLICATION FORM

- *Permits are exceptionally issued solely for HGVs making very local journeys and which start and finish within a radius of 4.8 miles of Burford*

Testimonies, the WiVTAG survey, and local hauliers indicate that the Burford permit scheme has caused anti-competitive effects amongst local hauliers, when quoting for work north and south of Burford.

Hauliers with a permit:

- Can tender with lower quotes.
- Do not have to use the longer alternative or unsuitable village routes.
- Can do more deliveries in a day.

Hauliers without a permit have:

- Less deliveries in a day
- Higher milage costs
- Higher driver costs per delivery
- Cannot compete when quoting for a job.
- Are forced onto unsuitable village roads.
- Have higher vehicle maintenance costs.
- Frustration and stress for the drivers
- Loss of customers

These factors are especially important where lorries are transporting aggregate etc, from building sites to waste and sorting centres, with 6 or more journeys/day, back and forth.

Burford Town Council stated that:

***DELEGATED DECISIONS BY CABINET MEMBER FOR ENVIRONMENT (INCL.TRANSPORT)
Thursday, 18 July 2019 at 10.00 am***

Burford Town Council have chosen to create, and issue exemption permits themselves as they have said they are better suited to understand which businesses should be exempt.

24. Advice has been given on the creation, issue and management of permits from Suffolk County Council who operate a lorry exemption permit system for several areas within the county.

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25. Concern from local companies regarding the impact of the experimental weight restriction on vehicular access for local heavy goods vehicles has been raised and shared with Burford Town Council to consider when moving forward with the scheme.

WIVTAG conclude that OCC and Burford TC have seriously underestimated the anti-competitive effects the permit scheme has created among local hauliers when servicing jobs south or north of Burford.

Haulage and transport testimonies

Most of the businesses in the survey are local: Witney, Chipping Norton, Carterton, Brize Norton, Stow on the Wold, Banbury, Stanton Harcourt, Chadlington, Kingham, Hook Norton, Abingdon etc. All are vital contributors to the economy in this area.

Based on the online survey and comments from telephone conversations, the primary impacts of the Burford restriction are:

- extra milage
- higher costs
- extra driver time
- extra driver stress
- extra damage to the environment.
- Ani-competitive effects caused by the Permit scheme.
- loss of business
- enforced use of unsuitable roads.

Examples of how hauliers have been affected by the Burford restriction.

Chris Hayter Ltd - Witney



“We have a customer based in Kingham and are required to make **several** journeys to collect and deliver **daily**, returning by the same route.

Prior to the restrictions being enforced (Burford and Adlestrop/Oddington) we would travel west via Burford and returned using the same route.

Since the closures, the only viable option is to go via A4095 to the East of Witney, join the A44 to Chipping Norton and at the Greedy Goose turn left on to the A436 and to Kingham.

The effect the restrictions has had

is to **increase** both the time it takes to complete the journeys and has added **in an additional 41,812km/year** and as a result a significant **increase** in our costs both in wages and fuel.”

WHC Plant and Tool Hire - Chipping Norton



“Just a few examples of our day-to-day deliveries around the Burford area:

- A** - Sturt Farm, Burford
- B** - Headford House, Shilton
- C** - The Old Bakery, Priory Lane, Burford
- D** - Walnut Tree House, Swan Lane, Burford

-The **red route** shows the route before the Burford Restriction **18km**

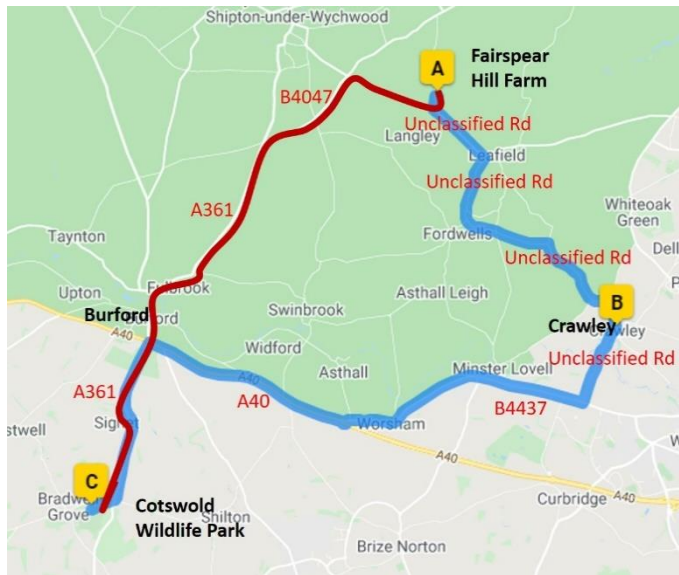
-The **blue route** shows the only alternative option since the Burford and A436 restriction. **48km**

An extra 30km each way

At the moment we have to go to Morton in Marsh then on to Stow-Bourton on the water then pick up the A40 to Burford.

We do not have a permit.”

Route taken by AW Cleaver on 17th and 18th Oct 2020.



AW Cleaver transported 400T of grit from Fairspear Hill Farm to Cotswold Wildlife Park. A total of 40 runs.

A-C Via Burford 12.8km x 40 runs = 512km

A-B-C Via Crawley 21.5 km x 40 runs = 860km

348 Extra km via Crawley

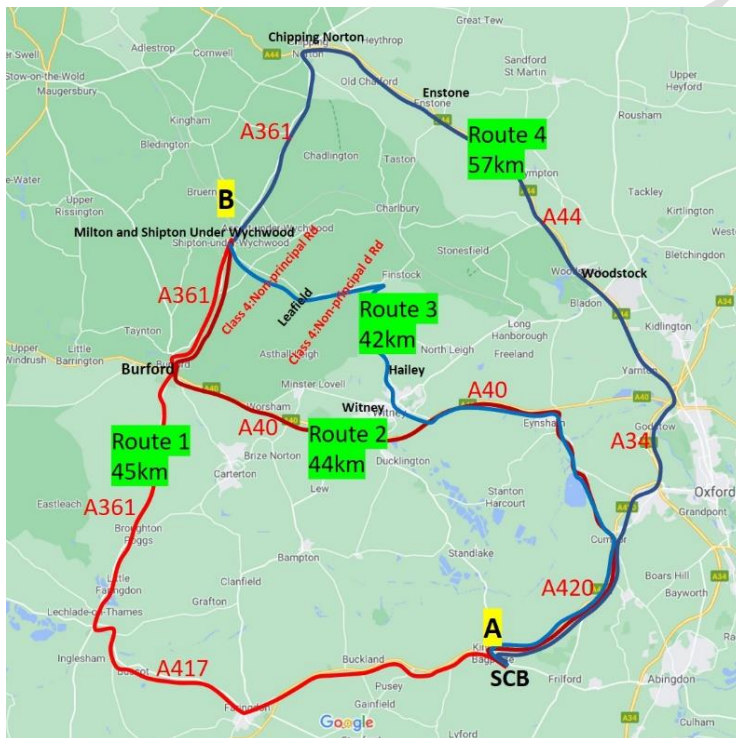
A-C Via Burford 14mins

A-B-C Via Crawley 30mins

10 Extra hours via Crawley

SCB - Kingston Bagpuize

“A typical example of how the weight restriction affects us would be the areas such as Shipton under Wychwood / Milton under Wychwood where we service building sites.



*Our location in Kingston Bagpuize dictates that we cannot go over Newbridge on the A415. The route **before** the Burford restriction would be either:*

Route 1 [A] Faringdon – Lechlade – Burford - Shipton under Wychwood / Milton under Wychwood. (45Km)

or

Route 2 Cumnor – Farmoor – Eynsham – Burford – Shipton under Wychwood / Milton under Wychwood. (44km)

*Due to the **new** restriction we have to use:*

Route 4 the A44 and go via Chipping Norton (57km, 12km longer one way)

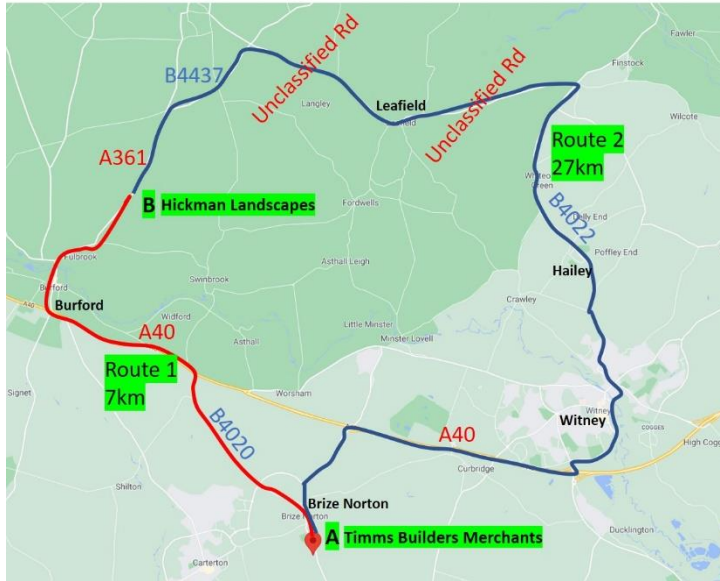
or

Route 3 cut through Leafield (42km, forcing us onto unclassified roads)

This puts extra time on our journey, adds cost to our fuel bills and additional wear on the vehicles. It also limits the work that we can complete in the day.

As such we have had to increase our prices for these areas to help reduce the impact.”

DC Griffin - Kingham



“We deliver to (A) Timms Builders Merchants at Brize Norton then on to (B) Hickman Landscapes, the most direct route is through Burford, instead we have to go through Witney to Finstock, then through Leaffield and onto Hickman brothers, an extra 20km one way.”

DC Griffin - Kingham



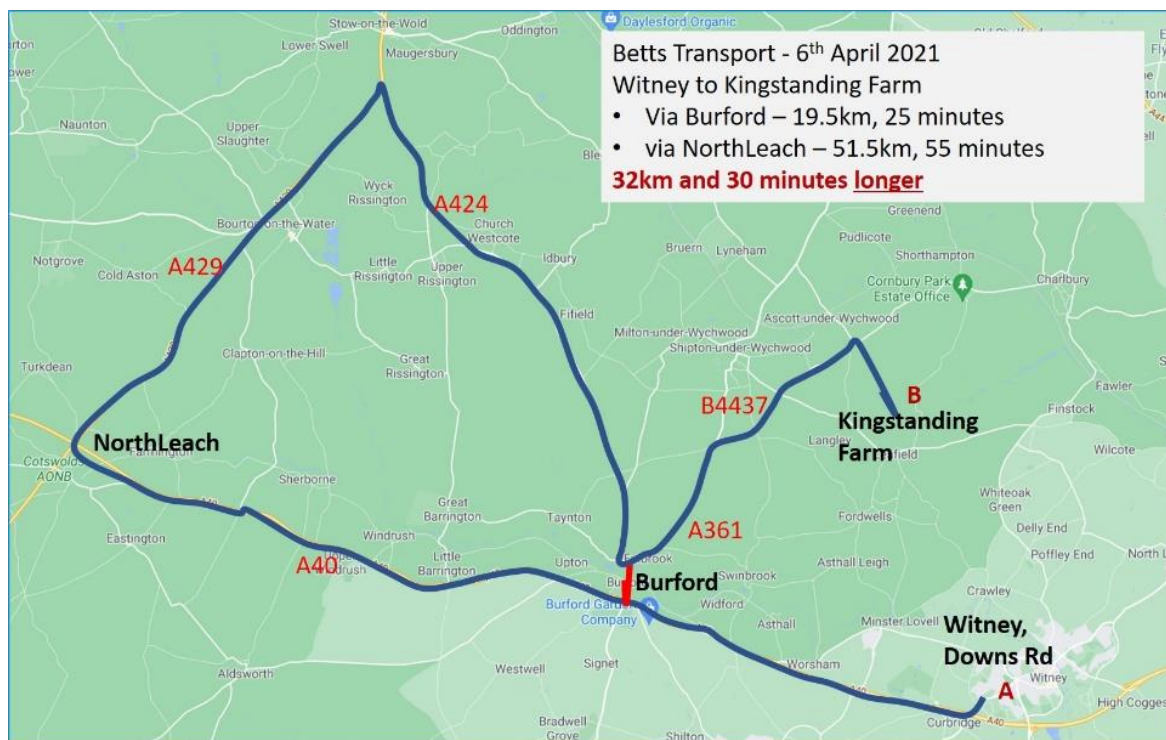
“Another regular job we do is from Walkers logs GL54 4DL to Daylesford Farm Shop and return [A–B].

The most direct route (shown in red) is through Stow and down the A436, which would be 46km there and back.

To avoid weight limit at Adlestrop, which was enforced by Stow on the Wold because of concerns the Burford weight restriction would have on Sheep Street in Stow, you have to go to Moreton in Marsh (shown in blue), up the A44 towards Chipping Norton then back down the A436 which is 76km there and back,

an extra 30km. Bearing in mind my vehicles do round 14km per gallon, plus add blue, wear and tear, drivers wages, this is considerable expense.

Betts Transport - Chadlington

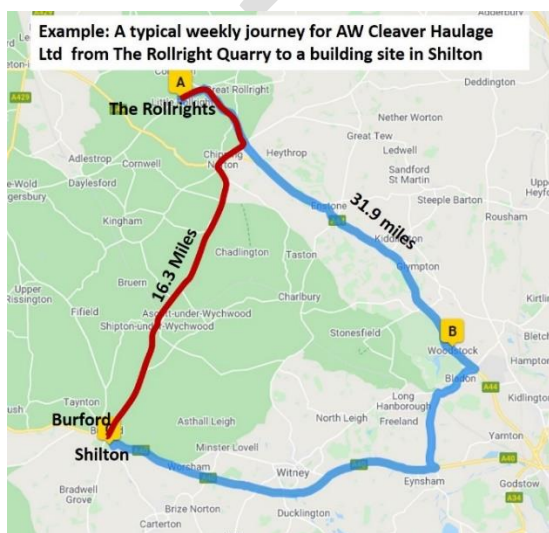


Some more direct quotes from the WiVTAG survey

- Witney Plant Hire (Witney)** *“This Weight Limit is having a huge negative impact on our Business financially, being based in Witney with 80% of our work within a 20-mile radius of our depot all our deliveries North of Burford on some occasions taking up to 2 hours longer and forcing our HGVs off good A' roads onto smaller B' roads. I cannot understand this decision to move HGVs off large A roads when they are in good condition and the Bridge is structurally good, onto smaller roads and not to mention the green impact.”*
- Crockett Haulage Ltd (Freeland)** *“Due to the Burford weight restriction we have been forced to find other routes. Going on smaller village roads, takes us longer, uses more fuel, as we have to go up and down the gearbox. The roads are not built for heavy truck use, so when passing, even cars and vans we are using the outer edge of the road which will cause road surface failure. The roads are not great anyway, so our costs go up due to suspension and steering damage.*
For instance, for 5 days we have been doing 35/40 loads a day from a Shipton Under Wychwood house building estate to Dix Pit Landfill in Stanton Harcourt, not being able to go through Burford has forced us to go via Leafield, Hailey and Witney. This has a derogatory effect on the truck and obviously tiring and frustrating for the drivers.
Can it be explained why certain local hauliers can get a vehicle permit to use Burford?
I consider myself as a local haulier but cannot get passes for our trucks. Hardly a level playing field for business and encourages short cuts and cutting corners to stay competitive, I think it is unfair competition.
We also run grab trucks on Thames Water Emergency work, we do standby and cover 24 hour 7 days a week, the other week one of our trucks was out at Stow and had to come back via Northleach which was a massive detour costing more in time and fuel! Hardly good for the environment!”
- Gaden Logistics Ltd (Upper Oddington)** *“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?"

- **Betts Transport Services (Chadlington)** *"This Burford restriction severely increases our running costs causing us to find alternative routes which are not really suitable for our size of vehicles which in turn creates other hazards to our local communities."*
- **KJ Millard (Chipping Norton)** *"We have lost all our business South of Burford as its uneconomical to travel either via Witney or Northleach."*
- **Alford Pallet Recycling (Lew, Bampton)** *"The closing of Burford bridge means we have to put an extra 40 - 60 minutes on our daily journeys in that direction which means on occasions we have to put 2/3 extra vehicles on the same stretch of road to fulfil our contractual obligations to a large contract we have. The closing of Tadpole Bridge Buckland Marsh and Newbridge Ox29 7QD also, have a similar effect."*
- **SCB Oxford Ltd (Frilford / Abingdon)** *"Not being able to use Burford is adding additional cost to our business and a higher environmental impact."*
- **Robey One Tipper Hire (Brize Norton)** *"Most of my competitors have a permit. This gives them an unfair advantage."*
- **Barry Jeffrey Transport Ltd (Mickleton)** *"Not being able to use Burford has a big cost to the fuel bill and an extra cost, in time, to go around. Our customers will not give me an increase to cover this extra cost."*
- **Ramthorne Concrete (Hook Norton)** *"The stupidity is we are being pushed into using the small dangerous roads around the villages, as we still need to deliver concrete. This also adds a mileage charge on to the customers."*
- **The Landscape Centre (Witney)** *"Burford is an extra cost to us. A family run business. The County Council should be helping local businesses."*
- **AE Gough & Sons (Llandrindod Wells)** *"The environmental damage that this is causing with vehicles that are achieving 7mpg and are having to do many more miles to get around this weight limit is huge. We are also looking at farm collection points and refusing work in this area as it becomes uneconomical to carry the goods. This will have a knock-on effect on your local businesses and their ability to continue trading."*



- **AW Cleaver (Stanton Harcourt)** *"We are driving a minimum of 25km extra on all journeys we would have previously used Burford bridge."*
- **Hayes Tipper Hire (Carterton)** *"Not only is Burford a problem but we are also shut off access to the A420 because of 7.5t limits at Bampton and 18T limits at Standlake, so have to go to Oxford or Lechlade as a result causing more impact to the environment."*
- **Barry Jeffrey Transport Ltd (Mickleton)** *"Not being able to use Burford has a big cost to the fuel bill and an extra cost, in time, to go around. Our customers will not give me an increase to cover this extra cost."*

- **Ducker & Young Scaffolding Ltd (Witney)** *“Using minor roads are not as safe, slower and doubles our travel time to get to the sites on the other side of the Burford bridge.”*
- **WHC Hire Services Ltd (Chipping Norton)** *“Each journey is adding 20 miles a trip and is very costly. We cannot charge the customer all for the sake of not being able to use the Burford bridge.”*
- **AM Robey Haulage (Brize Norton)** *“I cannot get a permit because I am 1 mile out of the permit zone. I have a regular job in Taynton, so not being able to use Burford is a huge problem for me. Look at a map and see the huge inconvenience.”*
- **Tubes Scaffolding Oxford (Abingdon)** *“Every extra mile an HGV has to go wastes fuel and makes a drivers job more difficult because of Taco restrictions. We operate two 10 tonne lorries and two 7.5 tonne lorries. 7.5 aren't technically commercially viable to us because they cannot carry enough material. 10-15 tonne are however but these are banned by such restrictions, and we need a fleet that can reach all jobs.”*
- **D.C. Griffin Transport (Kingham)** *“This has had a big impact on my business, for instance, we have delivered to Manor Farm at Burford OX18 4BJ then on to a farm on the Swinbrook Road just off the A40, Quickest route through Burford 3.6 miles, around Burford along A424 to Stow, A429 to Northleach and the A40 back to Swinbrook. An extra 25 miles!”*
- **Cotswold Forage (Icomb)** *“We were denied a permit due to not being close enough. How close do you have to be?”*
- **BA Hull Ltd (Lower Lemington, Moreton in Marsh)** *“Travel along the Fosseway to Northleach then back along the A40 to Crawley or Minster. This is a huge deviation. “*
- **AL Wilkinson Farming (Barnard Gate nr Witney)** *“The weight limit in Burford has drastically increased costs and time to deliver and collect farm goods, such as grain and compost to other farms across the Cotswolds.”*
- **Stobart Haulage Ltd (Chipping Norton)** *“The environmental and financial impact of the extra journeys is horrendous. “roads are for larger vehicles; they shouldn't be funnelled through small villages to go about their normal business.”*
- **NAP Gab Hire Ltd (Southmoor)** *“This has priced our services out of the area.”*
- **L A Lockhart Plant Hire Ltd (Bampton)** *“The restriction is costing us as a business, and we are losing work through it.”*
- **Breedon Group – (Naunton)** *“We also have 10 HGV Tippers/owner drivers that run consistently daily out of our Quarry at Naunton. We do a lot of Deliveries out towards Chipping Norton and Witney/Burford areas, this has added extra mileage per load of around 5 miles plus, each way and that incorporates additional timescales for each delivery. With the concrete mixers, since they can't use the A436 they are quite often held up in traffic around Moreton in Marsh and Stow on the Wold, this gets back logged often, and has massive effect, especially on our concrete products. Overall, when we did an analysis, it would cost extra £5k - £8K per year for the extra mileage”.*

Case Study – Leafield May 17 and 19, 2021

Leafield conducted a traffic count on each day from 7.30am – 4.30pm:

- Monday 17th May - **70 HGVs over 7.5T**
- Wednesday 19th May - **103 HGVs over 7.5T**

1. The HGVs were predominantly aggregate lorries carrying muck from two building sites at Shipton Under Wychwood and Ascott Under Wychwood.

Confirmed by the contractor in Shipton:

- 90 loads over the course of 4.5 days – a total of 180 trips.
 - Lorries doing approximately 6 trips a day.
 - Extra costs due to the Burford restriction were around £60 per load: the inefficient and slower route adding to fuel costs, as well as drivers' time and wear and tear to vehicles, equating to around £5,400 additional costs for the job.
 - Lorries were taking muck away to Dix Pit in Stanton Harcourt.
 - The route taken was from Shipton, via Leaffield, Hailey, and Witney, to Dix Pit in Stanton Harcourt. Passing through the Witney AQMA area on Bridge Street.
 - The route the lorries would have taken, as confirmed by the contractor, would have been from Shipton, via A361 to Burford, A40 to Witney, A415 to Stanton Harcourt.
2. In Ascott Under Wychwood during the week of the count, a new housing estate was started. Lorries were taking muck away to Gill Mill Quarry in Ducklington.

Confirmed by the building site:

- 20 loads a day – 40 trips.
- The route taken was from Ascott, via Leaffield, Hailey, and Witney (Bridge Street) to Gill Mill Quarry, Ducklington.
- Two hauliers confirmed that with permits for Burford the route would have been Ascott, B4437, A361 Burford, A40, A415 to Gill Mill Quarry, Ducklington.

The day Leaffield had 103 HGVs, over 7.5T, equals to 1 every 5 minutes.



Leaffield Primary School is adjacent to the road used by HGVs. Many village houses have gates straight onto the road. Footpaths in the village are generally narrow, and very narrow in places, and often bordered by walls. Children walk and cycle to school and elderly members of the community, using walkers, travel along these pavements. All have expressed nervousness and feelings of intimidation because of the proximity of these enormous vehicles – even when they are travelling slowly.



To walk from Lower End to the church, shop, pub, and school you have to walk on a very narrow path next to a high wall. Villager Mr Russ said 24.05.21: *'I used to ride my buggy up to the churchyard and pub, but I am worried about being involved in a serious accident.'*

Quote from an email 25.05.21: *'It's difficult enough taking the pram out on Leaffield's cracked and narrow pavements, now we also have these massive trucks getting far too close for comfort.'*

The current situation could have been anticipated and prevented had there been a dialogue with the haulage industry to understand the importance of Burford to hauliers' safe passage across the Windrush for contracts north and south of Witney and Burford. Despite many hauliers going to council meetings before the restrictions were implemented, their warnings were ignored. As a result, drivers, businesses, communities, and roads are suffering.



(Traffic counts and Company names of HGVs driving through Leafield on May 17th and 19th are available from Leafield Parish Council. The count does not include tractors, buses and dustbin lorries that would normally drive through the village)

Conclusion

The feedback from hauliers, via our basic survey and phone conversations, clearly indicates that the Burford weight restriction is detrimental to hauliers, farmers, and businesses vital to the local and wider economy, as well as local communities. These damaging effects have been exacerbated by the additional weight limit on the A436 just east of Stow, which was applied as a result of the Burford restriction. (See statement of Reasons for Adlestrop 7.5T weight restriction on the Gloucestershire County Council website)

Furthermore, weight restrictions are being considered by other towns with A roads, for instance Henley and Chipping Norton. WiVTAG considers that the introduction of further such measures will inevitably repeat the problems that are currently being experienced regionally as a result of the Burford scheme. This reinforces our opinion that arbitrary restrictions in single communities are not the answer.

We are in the midst of a global climate emergency. Oxfordshire County Council has committed to be Carbon Neutral by 2030, but each such weight restriction and inevitable increase in road kms travelled, increases the County's carbon footprint, as can be clearly seen from our evidence.

Local activism and hard work have enabled the collection and collation of this data. Burford TC could have carried out a similar survey both before and during the implementation of their scheme and, had they done so, we believe that they would have reached the same conclusions as WiVTAG; namely that alternative diversion routes on A roads for local and regional business are not reasonably available or viable. We conclude that Burford TC seriously under-estimated the detrimental effects that their weight restriction would impose on the haulage and transport businesses, as well as residents in our village communities.

Appendix C – Farming

Requirements and Characteristics

Burford's experimental TRO ignores the crucial requirements and characteristics of the 21st Century agricultural business:

- Cost effective, timely delivery or collection.
- Fresh produce
- Bulk haulage and storage
- High volumes of production (e.g. grain harvest; sheep lambing; milk)
- International supply and demand

Burford ETRO The issue of HGV permits to local farms within a radius of 4.8m, might have been appropriate in the 1960s. The modern size, weight and production rates demand the support of the largest possible haulage vehicles.

Production, Shipment and Delivery The economies of scale and cost dictate that profitable supply and delivery is by three-axle HGVs often with trailers. The maximum permitted axle load is around 8.5t. A 3-axle HGV can therefore weigh up to 26t; 2-axle trailers add another 18t. The combined unit is therefore 44t; equivalent to the biggest 5-axle HGVs on our roads:



| Produce | Daily Output/Load | Total Weight | Daily HGV Haulage |
|-----------------------|-------------------------------|--------------|-------------------------|
| Grain (Jul-Sep) | 100 acres/day (3.3t/acre) | 330t | 12 x 44t Grain Truck |
| Straw & Hay (Jul-Mar) | 150 Square Bails/day (500kg) | 75t | 3 x 44t Truck & Trailer |
| Cattle (Annual) | 30-40 cows (600 - 650kg each) | 26t | 1 x 44t Truck (Trailer) |
| Sheep & Lamb (Annual) | 300-500 sheep (80kg + each) | 26t | 1 x 44t Truck (Trailer) |

Transport & Haulage The key factor is that modern farming is now dependant on cost-effective/efficient major transport; the two industries are completely inter-dependent. There are a number of regular **national** and **regional** 'loops' that have effectively been broken by the weight restriction:

| From | To | Delivery | Pick Up |
|--------------------------------------|--------------------------------------|------------------------|--------------------------|
| Southampton/Avonmouth/ Carmarthen | Ducklington/Gill Mill | Aggregate | Stone, Build materials + |
| Ducklington/Gill Mill | Burford/Charlbury | Stone, Build materials | Grain & Straw |
| Burford/Charlbury | Southampton/Avonmouth/ Carmarthen | Grain & Straw | International Load |

| From | To | Load |
|------------------------------|------------------------------|--------------|
| Cirencester Livestock Market | Farms (Charlbury area) | Ewes/Cattle |
| Farms | Cirencester Livestock Market | Lambs/Cattle |

The important aspects of this fact are that:

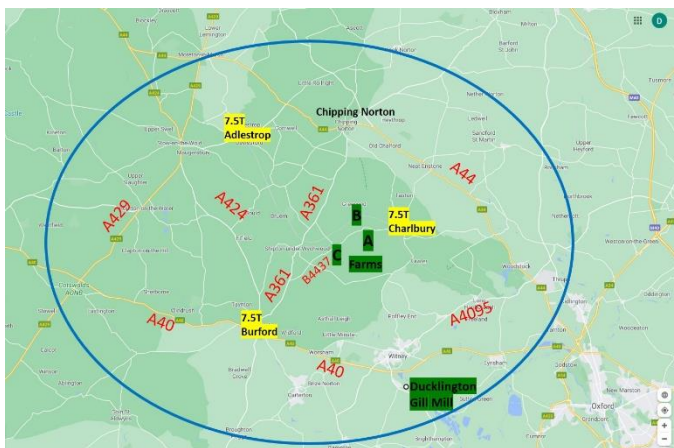
- Our local farmers join these ‘loops’ or national haulage circuits as soon as they place/request a shipment (order, collection, delivery)
- The hauliers (many of whom run over 100 vehicles) allocate contracts to the fleet; permits for single vehicles (registration numbers) would be inappropriate or 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.
- It is most unlikely that Burford Town Council would ever issue a permit to an entire fleet of HGVs, nor can the local farmer 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.

In all the above scenarios, the inevitable risk/consequence is that a (possibly non-English speaking) HGV driver (who has probably never run this circuit) learns about weight limit on arriving at Burford roundabout and, perhaps in desperation (e.g., carrying livestock with limited transit time) to fulfil the contract, will take or try any alternative, even if that is breaching an existing TRO or breaking the law.

Oxfordshire Farmers In addition, WiVTAG has been made aware of the following live and acute local examples, *crucially dependent on Burford bridge, but none of them within the 4.8m ETRO permit inclusion zone:*

| Location & Farm Type | Issue |
|--|--|
| Arable Farm Shipton-under-Wychwood | <p>In the past we have taken up to 2,000 tonnes of biosolids from Thames Water. This is a primary source of phosphate and to a lesser extent nitrogen, as well as organic matter for our crops. Since the introduction of the Burford weight limit, <i>we have been advised by Thames Water that they will no longer be able to supply us as their contracted haulier is not prepared to travel the extra distance on unsuitable roads to reach our farm.</i> Not being able to source biosolids for the farm will have a significant impact on the organic matter levels and fertility of our soils.</p> <p>Last December we were trying to load out large amounts of grain for export through Portbury docks, prior to the Brexit deadline at the end of December. Openfield (who we market our grain through) had fixings for our grain to be delivered to Portbury but were <i>constantly struggling to get hauliers to move our grain as a direct result of the Burford weight limit.</i> As a result, we did not manage to get it all moved and we still had a large tonnage left in store in January.</p> |
| Contract Arable Farmer: Coat Lodge Farm Aston Potters Hill Farm Leafield Crown Farm Ascott-u-Wychwood Swinbrook Farm | <p>A group of 4 farms effectively now in a ‘restricted island’ with haulage, transport, Clients and Suppliers being forced to take a 20-30m (A361: Chipping Norton; A44; A40) detour North to cross the River Windrush.</p> <p>The only geographical options open to this farmer being:</p> <ul style="list-style-type: none"> • Burford • Swinbrook (too small and narrow) |

| | |
|--|---|
| | <ul style="list-style-type: none"> • Astell (too narrow) • Minster Lovell (weight restricted) • Crawley (too narrow) • Witney (available but v difficult and steep) |
| Arable & Livestock Farm: Fairspear Hill Farm Leafield | <p>A large livestock (cattle, geese, sheep) farm North of Burford, with legal access for haulage reduced to Chipping Norton & Stow (30m detour) as all immediate surrounding bridges over the River Windrush (Burford, Addlestrope, Charlbury) are now closed to HGVs. Specific examples have included:</p> <ul style="list-style-type: none"> • Bird stillages delivery cancelled, delivery re-arranged user smaller delivery van. • Smith's Aggregates delivery cancelled. • Export of straw to Wales now forced to divert. • International corn and hay export to Holland collection by Polish drivers on Satnav on return journeys; drivers speak no English and use illegal routes to reach farm |
| Arable Farms – Milton-u-Wychwood | <p>A small group of farms now being forced to divert their produce and deliveries via Stow and the A426. Ineligible for a Burford TC pass due to their distance from the town, the heavy grain, straw, and hay HGVs have no option but to transit through small towns and villages, as opposed to the most direct route (being A361 to A40).</p> |



Conclusion Burford owes a considerable percentage of its historic wealth and buildings to the farming industry. The town's 'Sheep Street' and 'Tanners Lane' being but two examples of this traditional, long-standing connection. The town's ETRO is causing considerable strain on a local industry that is already feeling the serious economic pressures of a post-BREXIT Britain, and which might be justified to have felt ignored completely during the pre-ETRO analysis.

WiVTAG urges the recognition of the requirements of the local/regional agricultural and livestock farming industry; the wider Burford bridge is a vital link for the local and regional farming community.

Appendix D – Air Quality and Vibration

This Appendix deals with two of the concerns listed by Burford TC in their application for a weight restriction; namely air pollution and vibration associated with lorry traffic. Performance criteria were specified in the ETRO approval for air quality. No criteria were set for vibration.

Air Quality

Air pollution levels are reported as the concentration of Nitrogen Dioxide in the atmosphere measured in μgm^{-3} (microgram per cubic metre). A level of 40 μgm^{-3} or above is recognised as damaging to health. The Government has set 40 μgm^{-3} as the national objective level. It would like to ensure that air pollution never exceeds this level and local authorities are required to establish Air Quality Management Areas (AQMAs) for all localities where the national objective levels are exceeded. Use of terms such as ‘target air pollution levels’ or ‘average levels’ when referring to the objective level can be misleading.

The performance measures stipulated in the ETRO approval read as follows:

Air Quality Management Areas (AQMA) have been declared in Chipping Norton and Witney due to their high Nitrogen Oxide (NO₂) levels which are above the average for England. There is a concern that, diverting the HGVs from Burford may have a negative effect on the air quality in one or more surveyed areas. For that reason, during the review, we shall also be assessing the air quality levels. If they go above 55 μgm^{-3} (microgram per cubic metre) in Witney 57 μgm^{-3} in Chipping Norton, then a decision will be needed on whether to carry on with the experimental weight limit.

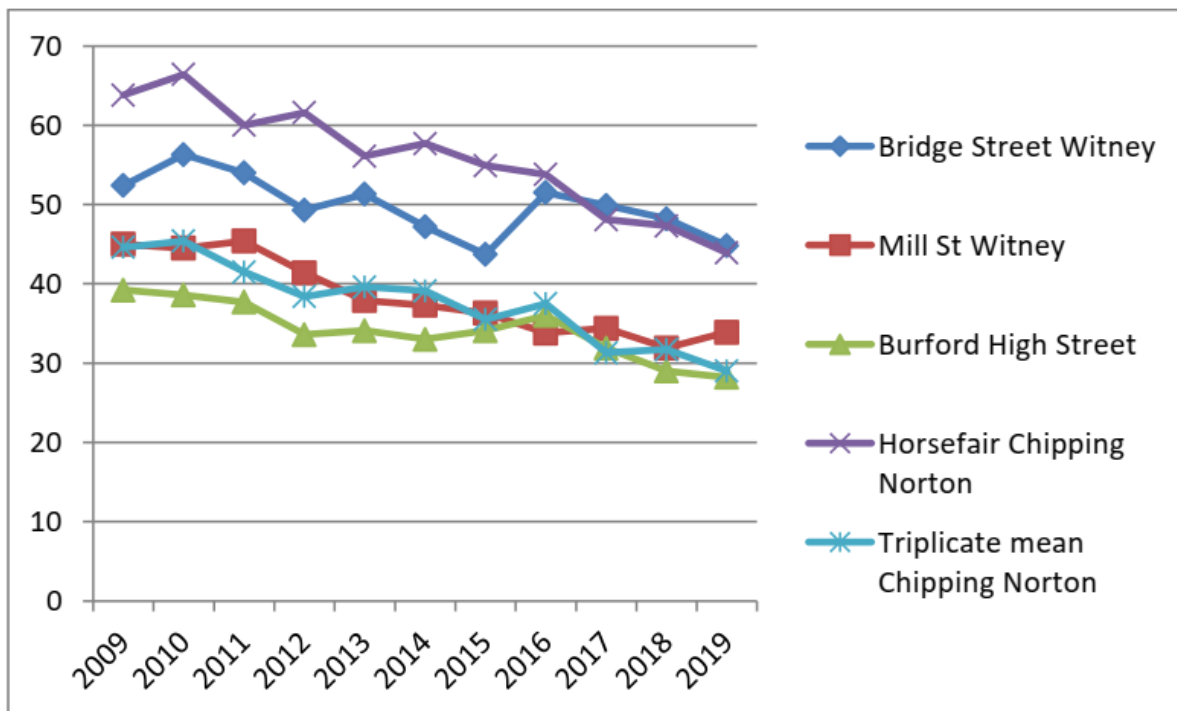
An annual report is produced by West Oxfordshire that provides an average figure for air quality levels in the areas where pollution is known to be above the national objective level. It is assumed that the performance criteria are based on these annual average levels although this was not specified. Monthly data is gathered and could have been used to provide a more current criteria for monitoring during the Burford ETRO. The most recent available report is the 2020 Air Quality Annual Status Report (2019) for West Oxfordshire District Council. This report was the basis for the inclusion of air quality as one of the reasons to implement the Burford ETRO. It explains that:

- The national objective of 40 μgm^{-3} was set and agreed to protect health.
- The air quality monitoring report for Burford shows that nitrogen dioxide levels were consistently below the nationally maximum acceptable level of 40 μgm^{-3} and were generally falling in value over time.
- Improving the air quality in Burford was not identified as a recommendation in this or previous reports.

The West Oxfordshire report focuses on nitrogen dioxide levels in **Witney** and **Chipping Norton**. Although these levels have also been falling over recent years, they continue to exceed the national objective level. Consequently, both areas have been declared as AQMAs. The report concluded that:

No other sites had levels approaching the national objective and the results show that, in the main, West Oxfordshire District Council has good air quality. Outside of Witney and Chipping Norton, the highest annual average reading of 28.2 μgm^{-3} (29.0 μgm^{-3} in 2018) was found at Lower High Street, Burford

WiVTAG was alarmed to note that the ETRO has, if anything, contradicted West Oxfordshire’s AQ recommendations by displacing HGV traffic to the very towns, especially Witney, where the problem requires urgent management.



HGV traffic displaced by the Burford ETRO through the Witney or Chipping Norton AQMA areas will have a detrimental effect on nitrogen oxide levels. As shown in the WiVTAG haulage and transport survey (Appendix B) 76% of local hauliers have indicated that the Witney crossing is one of the Windrush river crossings that they consider as an alternative to using Burford. The increase of 80% in HGVs coming through West End, Witney that was recorded by OCC in the traffic monitoring after the first six months of the ETRO bears out this alarming increase.

Burford air pollution - consistently within national objective levels (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 |
| 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 pollution levels - above national objective levels (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 |
| 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 |
| NAS5 | 4A West End | R | 12 (12) | 100 | - | - | 33.9 | 35.5 | 33.1 |

WiVTAG therefore takes the view that OCC acceptance of Burford's unsubstantiated claims of poor air quality levels has led to HGV traffic being displaced through Witney and Chipping Norton, where critical air quality levels already exist and where AQMAs have been declared.

Traffic Induced Vibration on Buildings

Property damage as a result of traffic vibration was cited by Burford as a reason for the A361 weight limit and was referred to in OCC Report CMDE4 2019/090. However, comprehensive studies have been undertaken by the Transport Research Laboratory (TRL – formerly TRRL) on the effects of vibrations on people, buildings, and equipment. The report studies methods for predicting the degree of disturbance likely to be caused by both airborne and ground-borne vibrations and includes a number of investigations into the effects of traffic vibration on buildings.

The Transport Research Laboratory (TRL) study and report concludes that although traffic vibration can cause nuisance to occupants, there is no evidence to support the assertion that traffic vibration can also cause significant damage to buildings. Specifically, it reports: -

6.2 EFFECTS ON BUILDINGS

A number of studies have been carried out to determine the possible effects of traffic vibration on a range of building types. In addition, a worldwide search of possible sources of information has been made. The conclusions of these studies include:

8. In studies of occupied buildings on relatively soft soils, where the degree of damage was compared in groups of similar houses adjacent to and remote from heavily trafficked roads, it was found that there was no significant difference in the condition of the two groups of buildings. This was despite the fact that 'worst case' conditions could reasonably be considered to have been studied.

9. Case studies of eight heritage buildings of widely different ages, size, and type of construction exposed to relatively high levels of traffic vibration revealed that there was no evidence that traffic vibration has caused the observed damage. The defects could more plausibly be explained by site factors other than traffic vibration.

10. A worldwide search for sources of relevant information on vibration damage in heritage buildings did not reveal any evidence that damage had been caused by exposure to traffic vibration.

WiVTAG therefore asserts that there is no justification for the claim by Burford that HGV traffic on the A361 is the cause of significant structural damage to listed and other properties in the town.

Appendix E – Criteria for Performance Measures

This Appendix comprises two sections:

- firstly, parts of the report to OCC Cabinet that relate to the approval of the ETRO at Burford and the criteria for Performance Measurement are shown and,
- secondly, WiVTAG's concerns about these performance measures are explained.

Background of Performance Measures approved by OCC.

In relation to the proposal for the Burford Weight Limit a report was prepared for Cabinet under the title "Delegated Decisions by Cabinet Member for Environment (including Transport) Thursday, 18 July 2019". Sections from this report relating to anticipated diversions of traffic caused by the Burford restriction and the Evaluation and Success Criteria are reproduced below:

The town council, local residents and local members of the county council have been campaigning for a weight limit for Burford for many years. They are concerned about noise, vibration, air pollution and road safety issues associated with lorry traffic as well as the negative impact on the town's tourist economy.

However, this is being taken forwards on a temporary, experimental basis initially. This is because of concerns raised in traffic modelling work that lorries might divert via other towns and villages, transferring these problems there instead. This would not be acceptable but there is some scepticism about how accurately it is possible to predict such diversion and an expectation that much of the lorry traffic diverting away from Burford would do so via major A roads and motorways, particularly in the case of long-distance lorry traffic. Traffic monitoring will, therefore, be carried out at a number of key locations in order to identify any possible, adverse effects.

Evaluation and Success Criteria

Officers at Oxfordshire County Council will commission three rounds of monitoring as part of the evaluation of the success of the experimental weight limit. The monitoring will take place pre-scheme implementation, nine months after the scheme is implemented (halfway point), and at eighteen months (end of the experimental period).

The six sites that will be monitored are:

- *Burford High Street,*
- *Chipping Norton town centre A44 / A361 junction (all legs),*
- *Bladon roundabout A44/A4095 (all legs),*
- *Witney town centre A4095/B4022 junction (all legs),*
- *B4022 between Witney and Charlbury,*
- *A436 between Stow-on-the-Wold and Chipping Norton (before the Oxfordshire / Cotswolds Border)*

A decrease in HGVs on Burford High Street of 50% or greater would be considered a positive impact. An increase in HGVs on other roads (specifically in Chipping Norton, Witney, and Woodstock) greater than 50% would be considered a negative impact.

Criteria for Performance Measures

In the extracts from the OCC Cabinet Report shown above, Burford's concerns about noise, vibration, air pollution and road safety issues associated with lorry traffic are listed as the justification for a weight restriction. WiVTAG's response on two of these issues, namely concerns about vibration in Burford and air pollution in affected communities, are detailed in Appendix D.

Quantified performance criteria to gauge the success/failure of the scheme were only defined for:

- traffic counts taken at six main road locations and
- air pollution in the AQMAs at Witney and Chipping Norton.

WiVTAG's comments in this Appendix are limited to issues associated with the traffic count performance criteria.

One of our original concerns about the Burford performance criteria was that the impact of Covid-19 restrictions on traffic levels could confuse the monitoring of traffic. It would be difficult to distinguish between changes caused by Burford ETRO and those caused by Covid restrictions. However, OCC's report on traffic monitoring after the first six months of the ETRO states:

"Overall HGV traffic has not significantly increased or decreased due to Covid-19. We would therefore conclude that Covid-19 has not significantly altered the data collected during February 2021."

This statement is borne out by a recent document from Dept. for Transport:

<https://www.gov.uk/government/statistics/transport-use-during-the-coronavirus-covid-19-pandemic>

This document clearly shows that traffic volumes nationally from 1st March 2020 to 17 May 2021 were at the following levels:

- Cars 71% (expressed as a percentage of levels on the first day of Feb 2020)
- LCVs 85%
- HGVs 96%
- All motor vehicles 75%
- Cycles 121%

More specifically for February 2021, when OCC were conducting their post Burford ETRO traffic counts, the national average volumes for HGVs were 99% of the Feb 2020 levels.

WiVTAG therefore agrees with OCC's conclusion that we can safely discount concerns about Covid-19 affecting the data for HGV movements.

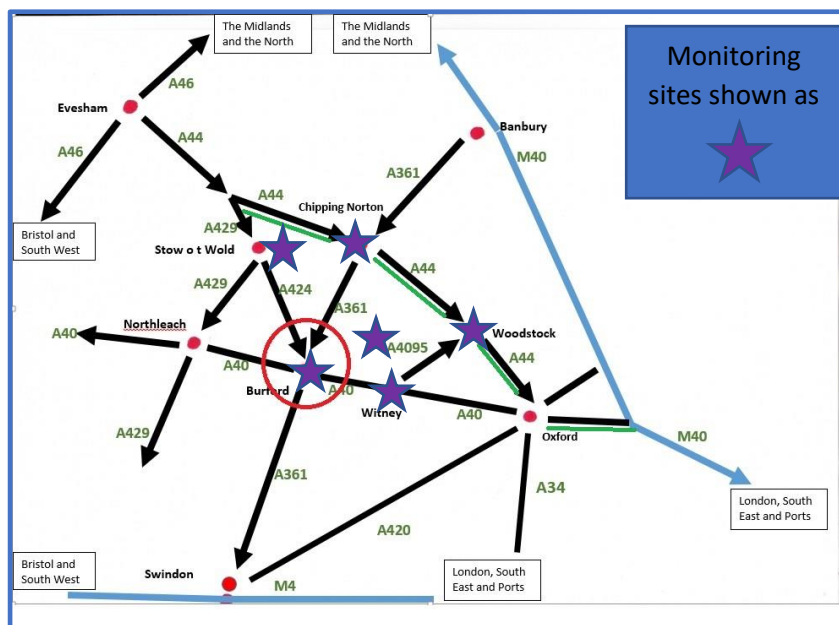
WiVTAG's opinion that the performance criteria lacked scope and definition are explained further below.

- **Monitoring Sites** The six monitoring positions (shown as red dots on the map) are located on the main road network within Oxfordshire and fail to include any monitoring of traffic on minor roads and in local Oxfordshire communities near Burford.



- **All but one of the monitoring sites are on A roads**
The exception is the B4022 between Witney and Charlbury. The choice of sites reflects OCC's expectation that "much of the lorry traffic diverting away from Burford would do so via major A roads and motorways, particularly in the case of long-distance lorry traffic." (See quotes from the Recommendation Report above). The report notes concern that lorries might divert via other towns and villages, transferring the problems there instead and states that this would not be acceptable. However, no supplementary sites have been included on minor roads that are likely to be used by HGVs.

- **Gloucestershire** There is no monitoring at all in Burford's neighbouring Gloucestershire villages or on the strategic network of main roads in Gloucestershire. The monitoring sites have been added to the wider schematic of principal roads in the area affected by the Burford scheme on the attached plan. This highlights the inadequacy of the selected sites to provide any real measure of changes in traffic movement over the affected area. Villages in Gloucestershire are affected as badly as the Oxfordshire communities and no recognition of the likely problems appears to have been included in Oxfordshire's consideration when the Burford scheme was approved.

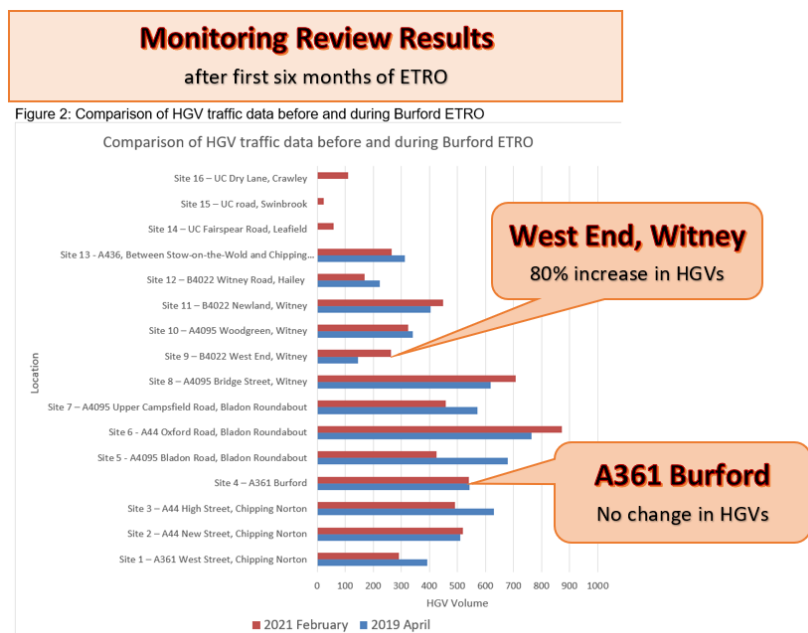


- **Commercial Traffic Network** The proposed monitoring allows no recognition of the impact on commercial vehicle movements associated with local businesses, in particular:
 - Travel between towns and villages north and south of Burford.
 - OCC's measures allow for diversions of established haulage along national routes but fail to cover the changes on regional routes.

- Failure to address the requirements for freight transport to the farming community. These farm businesses have an established national network for freight, but the system will not interface with the permit arrangements operated by Burford TC for the final section of their journeys between the national routes and the remote farm addresses. (See Appendix C for detail.)
 - Businesses within a 20-mile radius of Burford do not have an option to divert onto motorways or trunk roads in making deliveries to their customers. Hauliers will endeavour to use A roads and B roads as far as possible, but many have found that long diversions and the requirement to complete several deliveries in a day make this unviable. They feel they are forced onto routes along C roads and unclassified roads.
 - There is nothing in OCC’s performance monitoring method that will capture the scale and effect of HGV use along very inappropriate routes. More evidence of this problem is set out in Appendix B – Detrimental Effects on Local Haulage Businesses.
- The proposals for monitoring are based on traffic counts in a single week. This approach lacks any ability to identify and measure trends in traffic numbers over the six-month period that is being assessed.

Conclusion

In Section 2 of this Appeal Document, WIVTAG contends that the performance criteria were not fit for purpose. They lacked clear definition and scope as explained above. Nevertheless, they are the criteria that were approved, and we accept that they will be used to judge success. The results of the first six months of the ETRO have been assessed and reported by OCC. Their report concludes that on both performance measures set out for traffic monitoring, the scheme has not reached the required criteria for success.



Appendix F – Current OCC Local Transport Plan

OCC Planning and Policy

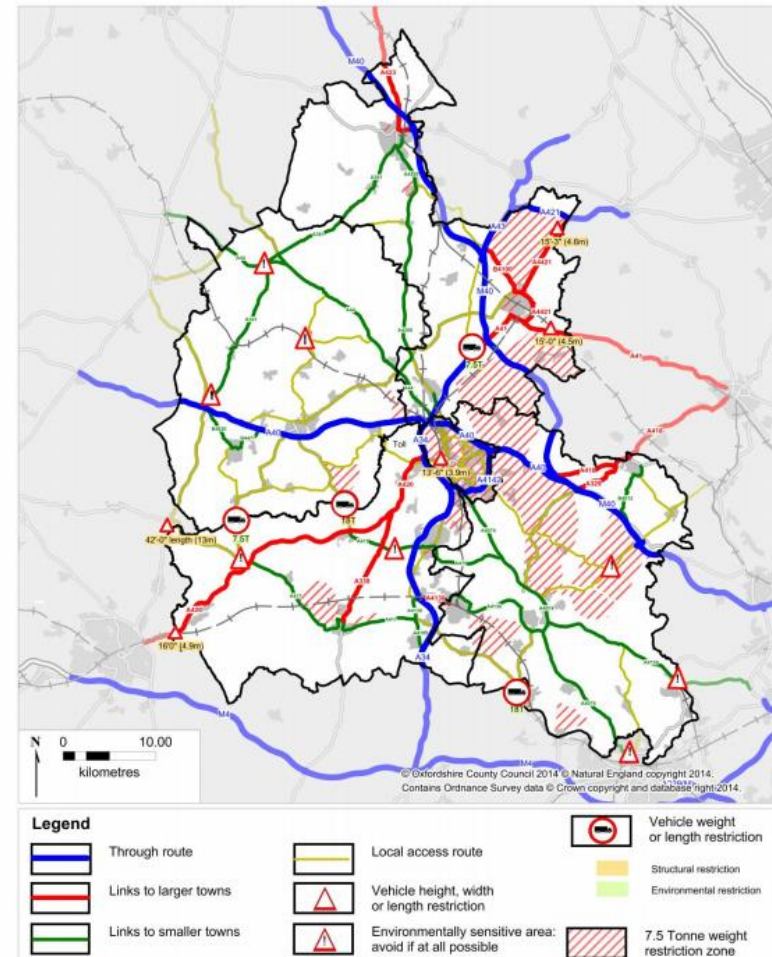
OCC maintains a comprehensive Local Transport Plan (LTP). WiVTAG generally supports the policies and strategies that are set out in these LTP documents. We also recognise that these policies are intentionally aimed at ‘gold standard’ level and may, in some cases, be challenging to implement fully.

In this Appendix, relevant figures, charts, and text concerning HGV management have been extracted from OCC’s policy documents. We have commented on each point in relation to the application of this policy to the approval of the Burford scheme.

Key elements of OCC’s LTP are:

- Relevant policies from Volume 1; namely Policies 05, 06, 24 and 29 (shown in **purple** text in table on pages F4-F11 below)
- The Roads Hierarchy Table (shown on pages F2 and F3 below that delivers Policy 05)
- Oxfordshire’s Lorry Route Map (shown right)

It must be noted that the A361 forms an integral part of both the Roads Hierarchy Table and the Lorry Route Map. It is part of the planned network of routes that HGV operators are encouraged to prioritise. A fair implementation of OCC’s LTP policies should therefore have ruled against the approval of the Burford scheme that closed the A361 to HGVs. However, on a more positive note, these elements provide the building blocks to strengthen and implement better freight strategy and management in the future if approval for Burford’s scheme is revoked.



Freight Strategy: Oxfordshire lorry route map

| Status | Definition | Characteristics/treatment | Routes in Oxfordshire |
|---|--|--|---|
| Class 1: Motorway | A road suitable for high speed long distance national traffic <i>Responsibility of Highways England (HE)</i> | Dual carriageway with limited access and type-restricted use No weight restrictions | M40 |
| Class 2a: Strategic Primary Routes | A strategic road suitable for longer-distance and inter-regional traffic. Main connections between defined primary destinations. Part of the national lorry route network <i>Responsibility of either HE or the County Council</i> | Able to cater for high volumes of traffic. Predominantly dual carriageway No restrictions on access or permanent weight restrictions Presumption against at-grade pedestrian crossings Presumption against speeds below 50 mph | A34, A43 (HA) A40 (M40 J8 to Witney) A41 (A34 to Bicester) A44 (A40 to A4095)* A423, A4142 (Oxford S / E bypass) |
| Class 2b: Other Primary Routes | A road suitable for longer distance and inter-regional traffic. Main connections between defined primary destinations. May be part of the national lorry network <i>Responsibility of the County Council</i> | Able to cater for high volumes of traffic Either dual carriageway or single carriageway No restrictions on access or permanent weight restrictions, may be some height restrictions | A40 (west of Witney) A41 (Bicester to Aylesbury) A44 (north of A4095) A420 (west of A34)# A422 (east of A423) A423 (north of A422) |
| Class 3a: County Principal (A) Classified Roads (major) | A road suitable for important cross- and inter-county traffic where there are relatively large volumes of traffic but not longer-distance travel. Should be able to cater for all types of vehicles <i>Responsibility of the County Council</i> | Usually good standard single carriageway Weight restrictions may be considered where there is a suitable alternative route of the same or better standard available | A338 (Wantage to A415); A415; A417; A418**; A421; A4074+; A4130; A4260 (north of A40) |

| | | | |
|---|--|---|--|
| Class 3b: County Principal (A) Classified Roads (minor) | A road suitable for important cross- and inter-county traffic where there are relatively lower volumes of mostly local traffic. Minor A-roads would serve to link larger settlements with major A-roads and provide missing links <i>Responsibility of the County Council</i> | Predominantly single carriageway; some sections might be of a lower standard Weight restrictions can be considered where there is a suitable alternative route available | A40 (east of A418); A329; A338; A361; A420 (through Oxford); A422 (west of Banbury); A424*; A436; A3400; A4095; A4129; A4144; A4155; A4158; A4165; A4183; A4185; A4260 (south of A40); A4421 |
| Class 4: Non-principal roads (B/C Classified) | A road suitable for other shorter cross and inter-county movements where volumes are relatively low and no principal road is available <i>Responsibility of the County Council</i> | Weight restrictions can be considered providing diversions are not excessive and do not prevent access to properties | All B and C roads |

these roads are on the Primary Route Network signed as “unsuitable for HGVs” because of height restrictions at railway crossings

* routes which could be reclassified in whole or part, in accordance with Council strategy on HGV routing

** A418 is signed as alternative Primary Route between Oxford and Aylesbury to A41 for HGVs

+ A4074 is signed as alternative Primary Route between Oxford and Reading to A34/M4 but signed as “unsuitable for HGVs”

Table 2: Road priority hierarchy

OCC’s Roads Hierarchy Table

Extracted OCC Policies from Local Transport Plan.

Management of HGV freight

OCC's LTP is published in a series of volumes under the general title "Connecting Oxfordshire, Local Transport Plan 2015-2031"

- There is a **Summary** Document that gives OCC's overall vision and strategy for local transport.
- **Volume 1: Policy & Overall Strategy** combines policy statements with explanatory supporting strategy commitments
- **Volume 5: Oxfordshire Freight Strategy** provides detail on encouraging the use of the strategic road network, discouraging the use of inappropriate minor roads through towns and villages and on OCC's involvement with National Freight Journey Planner.

For clarity in the table below, we have adopted a colour code for text from the LTP Volumes:

- Text from the Summary document is shown in **dark red**.
- Policy Statements from Volume 1 are shown in **purple**.
- Strategy Statements from Volume 1 are shown in **blue**.
- Freight Strategy statements from Volume 5 are shown in **green**.
- In addition, an amendment to Para 18 "Deter use of inappropriate minor roads through towns and villages" in Volume 5, that was introduced in November 2020, has been shown in **orange**.

| Source ref. | Text from OCC Local Transport Plan Documents | WiVTAG comment |
|---------------------|--|--|
| Summary Page 6 | <p>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. It also states our intent to support initiatives to increase the proportion of freight carried by rail.</p> | <p><i>The rural nature of Oxfordshire, its important agricultural sector and its relative prosperity result in a high demand for access by freight transport. Oxfordshire is also a transport “crossroads” for longer distance freight between the Midlands and London, the Midlands and the South Coast ports and the “Oxford Science Vale and Cambridge Arc”. Therefore, the application of a balanced, regional approach is required rather than arbitrary weight restrictions on a single A road in a single town.</i></p> |
| Volume 1 Page 9 | <p>It is also vital that freight journeys are made using suitable routes and with minimal environmental impact and that we support initiatives to increase the proportion of freight carried by rail; we have developed a freight strategy which aims to improve the transport of freight within and through Oxfordshire, while reducing the impact of Heavy Goods Vehicles (HGVs) on communities.</p> | |
| Volume 1 Page 12 | <p>We will work with district councils to develop and implement transport interventions to support Air Quality Action Plans by reducing harmful emissions from vehicles where feasible, giving priority to measures which also contribute to other transport objectives.</p> | <p><i>73% of the local HGV operators that support WiVTAG’s appeal have listed Witney as one of the crossing points for their vehicles to get across the Windrush river now that the Burford bridge is closed. This routes them through Bridge Street and Mill Street in Witney – a black spot for AQMA problems in the county.</i></p> <p><i>This very foreseeable difficulty should have been adequate reason to reject the Burford TRO application. Approving the Burford scheme directly contradicts the commitment given in OCC’s LTP.</i></p> |

| Source ref. | Text from OCC Local Transport Plan Documents | WiVTAG comment |
|--------------------------------|---|---|
| Volume 1 Page 30 Para 35 | The County Council is responsible for the maintenance of over 4500 km of roads in Oxfordshire. Like in other parts of the UK, the condition of the road network has deteriorated over recent years. This is as a result of a severe shortage of funding for maintenance, of increasing numbers of heavy vehicles using roads which were not originally designed to carry them, and successive harsh winters and flooding. For cyclists and pedestrians in particular, poor maintenance is a safety hazard and can deter people from walking and cycling. Funding levels over the last 25 years have been such that roads are able to be rebuilt approximately every 255 years on average, as opposed to the optimal 40 years. | <i>WiVTAG notes OCC's stated difficulties in funding maintenance for sections of the road network where increasing numbers of heavy goods vehicles are using roads that were not originally designed to carry them. This is another strong argument not to introduce a local restriction on an A road that is likely to divert HGVs onto inappropriate local roads.</i> |
| Volume 1 Page 37 Para 67 | We also need to accommodate through-travel: this does little to benefit the local economy, but most of the through traffic on Primary Routes has no suitable alternative to passing through Oxfordshire. Easing journeys through the county helps to avoid delays to local traffic. | <i>OCC's published lorry route map (shown above) includes the A361 through Burford as part of the planned freight network. The decision to restrict HGVs on this route goes against OCC's stated policy here.</i> |
| Volume 1 Page 50 Para 95 | Residents across the county complain about vibration, emissions and other environmental damage and dangerous experiences for cyclists and pedestrians caused by heavy lorries (HGVs) travelling through villages and small towns. It is a difficult area to control and our ability to succeed is dependent on both the resources we have available, but also the willingness of the operators to comply. | <i>The feedback that has been gathered from freight operators (see Appendix B) makes it clear that operators would welcome the opportunity to comply with LTP requirements and avoid small towns and villages. Finding alternative routes because of the Burford restriction has aggravated this problem and was within OCC's control to have prevented.</i> |
| Volume 1 Page 50 Para 96 | Where HGVs would cause environmental damage, we will retain environmental weight limits, enforceable by the County Council through Traffic Regulation Orders. These prohibit HGV through traffic but allow local access. If resources allow, we will consider imposing further environmental weight limits where there is compelling evidence of risk of environmental damage due to through HGV traffic, which outweighs the risks arising from the use of alternative routes. | <i>Although this policy is well intentioned it demands careful application to balance between "compelling evidence of risk of environmental damage due to through HGV traffic" in one community with the resulting "risks arising from the use of alternative routes" in other communities. From the evidence that WiVTAG has accumulated, we contend that using this strategy to justify Burford's ETRO has caused greater damage to other communities that outweighs any benefits in Burford.</i> |

| Source ref. | Text from OCC Local Transport Plan Documents | WiVTAG comment |
|----------------------------------|---|--|
| Volume 1 Page 50 Para 97 | We will also seek to minimise environmental damage from HGVs through the use of Routing Agreements and Construction Logistics Plans associated with new developments. Structural weight limits will be applied to protect the county's bridges where necessary. | <i>WiVTAG strongly supports the intended action in this paragraph.</i> |
| Volume 1 Page 50 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. | <i>The Roads Hierarchy Table shown above (Class 1 – Motorways through to Class 4 – Non-principal roads B/C classified) that OCC has set out to implement this policy is excellent and WiVTAG strongly supports its use. However, the Burford ETRO has forced HGV traffic from a Class 3b road (A361) on to Class 4 roads and even lower classes of unclassified roads in both Oxfordshire and Gloucestershire. A further explanation of diversion route protocol and application is given in the additional paragraphs and plans below this table (see pages F13 and F14).</i> |
| Volume 1 Page 50 Policy 06 | Oxfordshire County Council will support measures to reduce the number of Heavy Goods Vehicles travelling through the county, by promoting freight by rail and working to improve strategic roads. | <i>Use of rail seems like a very sensible strategy but distribution from rail hubs could still create problems with deliveries by regional operators.</i> |
| Volume 1 Page 74 Para 175 | We will help to conserve designated Areas of Outstanding Natural Beauty (AONB), though working with the AONB management teams to implement relevant policies or actions from their management plans. | <i>WiVTAG supports the protection of AONBs</i> |
| Volume 1 Page 74 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. | <i>Using this policy to justify the ETRO in Burford and protect its AONB has inevitably displaced HGVs to other equally sensitive areas of AONB (For example, town and village Conservation Areas and the Blenheim Palace World Heritage Site). The contamination and environmental damage caused by HGVs using longer diversion routes than the route through Burford will aggravate this problem.</i> |

| Source ref. | Text from OCC Local Transport Plan Documents | WiVTAG comment |
|----------------------------------|---|--|
| Volume 1 Page 78 Policy 29 | Oxfordshire County Council will work with district and city councils to develop and implement transport interventions to support Air Quality Action Plans, giving priority to measures which also contribute to other transport objectives | <p><i>The Burford ETRO is directly contrary to this policy as it imposes additional air quality risks on Witney, Chipping Norton, and Woodstock.</i></p> <p><i>Data published in the OCC LTP are shown in Appendix D of this appeal document. These confirm that the NO₂ Annual Mean Concentration in Witney is substantially higher than that in Burford (42 and 28.3 respectively) Furthermore, in Burford the trend is downwards over time whereas in Witney the trend is rising and frequently exceeds intervention levels.</i></p> |
| Volume 5 Page 2 Para 3 | To provide for this we need to make more efficient use of transport networks and systems across all modes of transport, including use of the rail network. However, the majority of freight movements in our predominantly rural county will continue to be by road. It is essential that we make use of our road network as efficient as possible, with larger goods vehicles using the strategic road network in preference to minor roads, encouraged by measures to reduce journey times and increase journey time reliability on these important major routes. | <p><i>WiVTAG accepts that the transfer of freight to rail will be limited in Oxfordshire.</i></p> <p><i>Nevertheless, this strategy provides an opportunity to encourage the efficient use of the strategic roads for freight vehicles in preference to minor roads.</i></p> <p><i>In the absence of arbitrary weight restrictions, operators and communities could work together to deliver a better regional solution that would deliver the intended benefits of this LTP strategy.</i></p> |
| Volume 5 Page 3 Para 6 | The Department for Transport 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, where the costs 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. | <p><i>The Burford ETRO moves HGVs on to routes where the external cost per lorry mile is significantly higher. Not only will this result in high, unreasonable costs to transport and haulage operators, but it will impose impossible maintenance burdens on OCC for damage repairs on the unclassified roads that are already underfunded. Not only will pothole repairs and patching be increased but drainage and edge foundations will be destroyed. The consequence is that the road infrastructure in many communities will deteriorate with little or no realistic chance of future maintenance.</i></p> |

| Source ref. | Text from OCC Local Transport Plan Documents | WiVTAG comment |
|-------------------------------|--|---|
| Volume 5 Page 5 Para 8d | Deter use of inappropriate minor roads and movements through towns and villages and other environmentally sensitive areas, except where this is essential for local access. This also helps to minimise damage by lorries to road surfaces and bridges. We will set out our policy on the introduction of further environmental weight limits in Oxfordshire and on their enforcement | <i>WiVTAG supports this policy to keep HGVs to A class roads wherever possible. By closing off the A361 in Burford HGVs are now being displaced onto far less suitable routes.</i> |
| Volume 5 Page 6 Para 10 | There has been growing public and political concern in recent years about the number of lorries passing through towns and villages in Oxfordshire. In 2012 the Oxfordshire lorry routes map was updated to show both recommended routes and restricted locations. However, few drivers and freight operators use individual local authority maps such as these so the impact on route choice is limited. | <i>WiVTAG supports the use of a National Freight Journey Planner for HGV operators. This reinforces our call for a regional solution to the perceived HGV problems that would include an agreed format for freight traffic.</i> |
| Volume 5 Page 6 Para 11 | Oxfordshire County Council has therefore signed up to the National Freight Journey Planner offered by the specialist mapping data consultancy PIE. This is an opportunity get our lorry route data to a wider audience. Drivers and companies are more likely to use the national Freight Gateway journey planner product than individual local authority maps such as Oxfordshire's. | |
| Volume 5 Page 6 Para 12 | Freight Gateway allows an operator to enter details of a particular vehicle (size, weight, etc.) and routes it accordingly. Freight Gateway shows the user the location of restrictions so that it is clear why a particular route is being recommended. It will incorporate all the details of our restrictions and recommended routes. Features include a lorry watch link to allow local people to report breaches of weight restrictions and detailed local mapping. | <i>WiVTAG supports the use of a National Freight Journey Planner for HGV operators. See previous entry.</i> |

| Source ref. | Text from OCC Local Transport Plan Documents | WiVTAG comment |
|-------------------------------|--|--|
| Volume 5 Page 7 Para 17 | <p><i>Deter use of inappropriate minor roads through towns and villages.</i> The county council will consider environmental weight restrictions across the County, particularly areas which are subject to significant levels of HGV traffic, prioritising the towns of Burford, Chipping Norton, and Henley-on-Thames. However, the county council is very unlikely to have any funding available for this in the coming years so any schemes would need to be funded through development and/or by local communities, businesses, and town/parish councils.</p> | <p><i>Whilst WiVTAG recognises the public demand for restrictions on HGV traffic, the significance of freight movements to the national, regional, and local economy is of high importance. In order to address both sides of this debate WiVTAG seeks a regional solution that recognises that freight is most effectively moved on A class roads and restrictions should, in general, be limited to the minor local road network.</i></p> |
| Volume 5 Page 7 Para 18 | <p><i>Deter use of inappropriate minor roads through towns and villages.</i> Our policy on new environmental weight limits is that it would first be necessary to establish that a particular location has a problem in terms of environmental and economic impacts as reflected in congestion, air quality, road danger and public concern. It would then be necessary to identify the share of HGV traffic that does not constitute local access based on origin and destination surveys and other data, as well as analysis of alternative routes. Consideration of weight limits would also need to have reference to the road hierarchy set out earlier in this Local Transport Plan.</p> | <p><i>The Burford ban has simply transferred the problems of air quality, safety risk and public alarm to other communities (See detail in Appendix D). Indeed, there is ample evidence that these risks are greater in some of these communities. We can see no evidence of any comprehensive Origin and Destination surveys, neither would it appear that the significance of the road hierarchy has been considered given that many HGVs are now using lower category roads on the network.</i></p> |

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| <p>Revised Volume 5 Para 18 Published in Nov 2020</p> | <p>Revised wording to replace paragraph 18 of “Deter use of inappropriate minor roads through towns and villages”.</p> <p>Local requests for environmental weight limits and other restrictions should be agreed and submitted by one or more local i.e., town or parish councils. Oxfordshire County Council officers will meet representatives of the local council on site to discuss their concerns within one month of being approached.</p> <p>Oxfordshire County Council officers will carry out a free of charge initial assessment of the request within three months of the initial approach. This assessment will consider the policy and strategy fit with the freight strategy, the LTP road hierarchy map and locality transport strategies. Officers will also check any routeing agreements and seek comments from district council planning and economic development staff, as well as from the local county councillor(s). The free of charge initial assessment will also consider the availability of better alternative route minimising impact on neighbouring settlements. Subject to available expertise, the effect of restricting HGVs will be modelled using the Oxfordshire Strategic Model. The assessment will also take account of accident and traffic data held by the county council. It will assess frontage uses including residential, education, social care premises, etc. as well as the impact on cyclists, pedestrians, and other vulnerable road users. The aim will be to identify potentially viable schemes and eliminate “non-starters”, so that unrealistic expectations are not raised, and local funding is not wasted on schemes that are unlikely to be implemented.</p> <p>The second phase of the assessment would need to be funded by the local community through an application fee (to be determined). This would consider the likely effectiveness based on video ANPR surveys of HGVs by matching times and number plates at different locations to establish patterns of movement and whether or not vehicles stop in between (which implies local access to load or unload). The surveys would also distinguish between HGVs above 7.5 tonnes with two axles and HGVs above 18 tonnes which have three or more axles.</p> | <p><i>WIVTAG welcomes this revised wording. It indicates a clear intention to deliver a more regional approach. We would support this and take what action we can to assist OCC in delivering a fair application of this strategy.</i></p> <p><i>There remains a risk that environmental weight restrictions may only provide a solution for larger communities:</i></p> <ul style="list-style-type: none"> • <i>it would allow vehicles up to 18t to have access for legitimate delivery and collection but banning the through movement of larger HGVs.</i> • <i>but it may fail to protect the communities that must then accept the diverted HGVs.</i> <p><i>Clearly OCC’s offer to carry out an initial assessment and eliminate “non-starters” is seen as a protection to such vulnerable communities.</i></p> <p><i>However, the heaviest vehicles have to go somewhere, and application of this policy must ensure that use of the strategic road network of A and B roads continues to be a priority.</i></p> <p><i>This revised policy also seems to open a door to wealthier large communities who can afford the funding for the second and third stages of this new assessment approach. Small communities with few residents and very limited budgets will have no opportunity to go down this route.</i></p> |
|---|--|--|

| Source ref. | Text from OCC Local Transport Plan Documents | WiVTAG comment |
|-------------|--|----------------|
| | <p>The aim will be to identify whether or not an environmental weight limit would lead to a significant reduction in HGV movements (i.e., those representing through traffic as local access would be exempt). It would also inform a recommendation on the geographical area to be covered and whether a weight limit should be set at 7.5 or 18 tonnes. This stage would therefore start to look at potential solutions.</p> <p>There is a tension between point or small zone restrictions (which are easier to enforce) and larger zones (which are less restrictive of local businesses). One possible compromise would be to apply a geographically tight (point or small zone) restriction at 18 tonnes instead of 7.5 tonnes. This would still exclude articulated and heavy quarry trucks but would not apply to smaller and lighter two axle HGVs. There is also the question of whether overnight and weekend restrictions might be effective in places where noise is the main concern.</p> <p>The third phase of the assessment would need to be funded by the local community through an implementation fee (to be determined). This would cover the costs of traffic orders, consultation and signing. It would also cover the first 12 months of enhanced enforcement activity following introduction. It would not be reasonable to expect local councils to commit longer term funding, but they would of course have an interest in ongoing enforcement and might well choose to commit further funding towards this in due course.</p> | |

Diversion Routes for HGVs

OCC's Roads Hierarchy Table is shown on pages F2 and F3 above. This classifies all roads in the county strategic network from Class 1- motorways down to Class 4 – Non-principal roads (B/C classified).

Roads affected by the Burford scheme have been copied from the full table and are listed below.

For this document only, we have added Class 5 – Minor roads (D classified) and Unclassified roads.

| LTP Hierarchy Status | Road Type | Oxfordshire Routes |
|----------------------|--|--|
| Class 1 | Motorway | M40 |
| Class 2a | Strategic Primary Routes | A40 (M40 J8 to Witney) A44 (A40 to A4095) |
| Class 2b | Other Primary Routes | A40 (West of Witney) A44 (North of A4095) A420 (West of A34) |
| Class 3a | County Principal (A) Classified Roads (major) | A415 A4260 |
| Class 3b | County Principal (A) Classified Roads (minor) | A361 A436 A424 A4095 |
| Class 4 | Non-principal Roads (B/C) Classified | All B and C Roads Including B4047 B4022 |
| Class 5 | Non-principal Roads (D) Classified Unclassified Roads | Typically, this includes all narrow roads in villages |

- **Standard Practice**

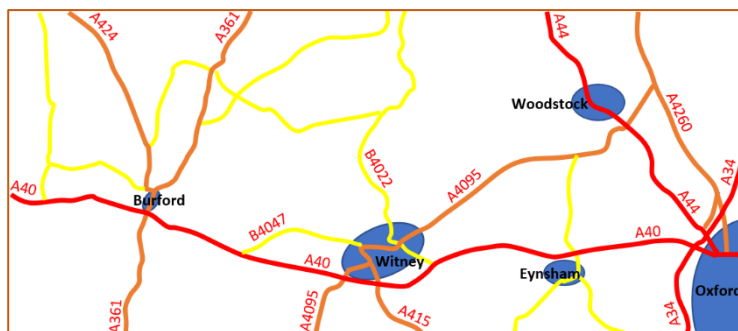
Planned diversions must direct traffic along routes of at least the same class as the road that is being closed. Furthermore, the concept of equivalence between a reduction of HGVs in one community and a similar increase in HGVs in another is not valid unless full account is taken of the suitability of the infrastructure within those communities to support an increase in HGV numbers. Account should therefore be taken of the road geometry, proximity of homes, adequacy of footways and facilities for vulnerable road users, general traffic volumes and the like. This was clearly not undertaken as part of the considerations for the Burford ETRO or its subsequent review.

In Burford's case, the A361 has been given a hierarchy status of Class 3b. Diversion routes along road classes 1, 2a, 2b, 3a or 3b (shown as red and orange on the plans below) may be acceptable provided the infrastructure is adequate. Roads shown yellow are Class 5 roads and should not be used as diversion routes for the Burford closure of the A361 (Class 3b).

- Diversion Routes to the West of Burford**
 A diversion route is available via the A40 to Northleach and A429 to Stow.
 However, these routes are longer and less easy for large vehicles to navigate (ref tight roundabout at A40/A429 junction)
 Some drivers have used the unclassified road through the Barrington's despite the 7.5t weight restriction.



- Diversion Routes to the East of Burford**



The only legitimate diversion route that uses roads of Class 3b or better is via the A40 to Witney, then using the A415 and A4095 to reach the A44 and then turning north on the A44 through Woodstock.

In practice, drivers are choosing to use Class 4 routes (B4047, B4022 shown yellow). Class 5 routes are too small to feature on a map of this scale, but WiVTAG's market research confirms that HGV drivers are also using Class 5 routes along unclassified roads in Swinbrook, Minster Lovell and Crawley to access Windrush crossings. Such use of these very minor roads by HGVs is the highest concern of communities represented by WiVTAG.

Consequences of inappropriate route choices by HGV Drivers

In the event that HGVs use Class 5 routes, there will be inevitable infrastructure damage to verges, kerbs, highway construction (particularly road edges) and drainage. There is little or no expectation that funding can be made available to carry out maintenance repairs. A gradual degradation of the highway assets in small communities appears to be inevitable unless the Burford restriction is withdrawn.