

# Response to Oxfordshire County Council's Consultation on the London Road, Oxford, Study from the Headington Committee for Development Action

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## 1 INTRODUCTION

### a) Who are we?

The Headington Committee for Development Action (HCDA) was formed under the auspices of Oxford City Council in 2001. The aim of HCDA is to “... *promote the benefit of the inhabitants of Headington... by associating together the said inhabitants and the local authorities, voluntary, commercial and other organisations in a common effort, to promote the area, civic pride, community projects, environmental improvements, well-being... with the object of improving the conditions of life for the said inhabitants...*” We seek to be a coordinating group for residents associations, community groups, businesses, major employers, schools and churches in Headington. (Appendix A gives details of our constituent groups.) We have canvassed widely among our constituency in preparing this response. Thus, we represent the views of very many people who live and work in Headington. This is true not only in a general sense, but specifically with regard to the study and its proposals.

### b) Why are we making this response?

The London Road Study is a very important piece of research with linked proposals, the outcome of which will probably affect the lives of those who spend a significant proportion of their time in Headington – either through residency or employment. In recognising this, HCDA is very concerned both at the lack of consultation that has taken place – particularly amongst residents’ associations and parish councils – and at the limited extent of what consultation has been undertaken. Because of our constituency we thus felt that it was imperative that we should make our views known. We urge the County Council to continue with the consultation process and to broaden the consultation from the very limited process that has taken place thus far.

### c) On what will we comment?

As a group representing Headington we will restrict our comments to those aspects of the study directly concerned with Headington – we will not comment on the proposals for St Clements. However, some of the proposals will have an impact on other areas of the city adjacent to Headington and we will thus include comments on those.

## 2 GENERAL COMMENTS ON THE STUDY AND PROPOSALS

### a) The Community of Headington

We are not idealists and neither do we wish to recreate the world of a bygone age. However we have a general concern about many of the proposals in both study ‘Approaches’ in that we believe that they will exacerbate the decline of Headington as a community. The proposed significant increases in the number of bus lanes, coupled with other linked initiatives, will result in the London Road becoming even more of a major thoroughfare. Headington is already a community literally divided by a road – many of these proposals reinforce this. No longer will central Headington be a focus for local shopping and socialising – it will be a place that one passes through as quickly as possible en route to somewhere else.

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## b) Buses

- i) It is clear from the aims of the study that two of the three key aims are bus-oriented. Even if these had not been stated it is obvious from the proposals that the consultants have sought to increase the reliability of bus services. No-one would argue with this objective, but we believe that the proposals lack imagination and vision for dealing with bus-related issues.
- ii) The study gives a distribution graph for the length of both in-bound (westbound) and out-bound (eastbound) journeys. However, few conclusions can be drawn from this. For instance, this shows that even at the morning peak, in-bound journeys may still only take ten minutes. Does this warrant the number of measures that have been proposed to improve bus traffic flows? Similarly, although there is a clear pattern of delay for out-bound journeys during the evening peak, there is no analysis in the study of why this occurs.
- iii) The study states that "London Road is the busiest public transport route into Oxford with over 90 buses per hour."  
[It would have been helpful if this figure of 90 buses per hour had been further defined. For instance, is this an average and, if so, over what period is it taken, or is it a peak figure? Does it include both in-bound and out-bound buses or only those travelling in one direction? Does it include cross-country services and the London and airport coaches?]  
However, at no point does the study advocate any form of *management* of the bus traffic. For instance:
  - Do all of the buses currently travelling through Headington have to use that route?
  - Instead of buses adopting fixed-frequency timetables between about 0730-1900 is there no scope for variable-frequency timetables based on an analysis of demand?
  - Could local services utilise smaller buses during off-peak periods? [We recognise that there may be issues with disabled and parent-with-pram access on smaller vehicles, but believe that the option is worth investigating.]
  - Why do all buses have to stop in the same bays? [Central Headington has several bays on the London Road which the study proposes should be used solely as loading bays. Why could not some of these be used as additional bus bays, thus allocating bus stops for different services to separate and distributed bays?]
  - Can bus drivers be dissuaded from using Headington as the place where they stop whilst waiting for their journey to synchronise with their timetable? This present practice causes both congestion and pollution.
- iv) The lack of published detailed analysis and evaluation we have mentioned above makes it difficult to determine whether all of the proposed measures are necessary. For instance, has any account been taken of the alterations in traffic flows that could result from the changes to be implemented at the Green Road Roundabout from April 2006? Similarly, with deeper bus bays and improved ticketing, would bus journey times be improved and stabilised such that increasing the number and length of bus lanes would prove unnecessary?

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- v) We welcome the proposals regarding improved bus ticketing. Even with improved and deeper bus lanes, we agree that an objective must be to reduce to a minimum the amount of time that buses spend at stops. Not only does this benefit traffic flow, but it also reduces the amount of pollution caused by idling engines in static buses.
- c) Cycles**
- i) As an organisation that has been campaigning over recent months to improve the situation of cyclists in Headington, we are both disappointed and concerned at the proposals relating to their use of the London Road.
- ii) Our greatest concern relates to the proposal that bus lanes should be shared by cyclists. This seems to disregard one of the aspects of the study – viz. the number of accidents, including fatalities, that have occurred on this stretch of road. Cyclists will be extremely vulnerable if required to adopt these routes. It is likely that many will simply cycle on the pavements. This practice is already common in those parts of Headington with high volumes of traffic (e.g. Old Road between Lime Walk and Windmill Road) and is dangerous for both cyclists and pedestrians. If any cyclists are brave or foolhardy enough to use these proposed lanes then an unintended consequence may be that buses will be impeded as they wait to overtake those cyclists.
- iii) We have argued elsewhere that we believe that designated cycle lanes on pavements are inherently dangerous for pedestrians and cyclists. Neither party always keeps to their allocated part of the pavement. We are concerned that the proposals appear to *increase* the amount of shared-use pavement.
- d) The John Radcliffe Campus**
- i) The impact on Headington and its environs of staff and patient travel to and from the John Radcliffe Hospitals campus has not been mentioned in the study. For those travelling from within the city, London Road and Headley Way are a principal access route to the site. If vehicular traffic had another convenient and reliable route into the campus, it might be that this in itself would significantly ameliorate current and projected future traffic issues on the London Road.
- ii) For many years there has been talk of a new access route to the campus from the Northern Bypass. We recognise the concerns of those on the Northway estate about the impact of this on their locality. However, such an access route does not have to be by road. Provision for parking and a bus terminus in the vicinity of the Marston flyover could then be linked directly into the hospital campus by some form of passenger rapid transit system.
- iii) We believe that the study and proposals are incomplete by not taking sufficient account of traffic flows in Headington relating to journeys to and from this large centre of employment and high-volume access by patients and visitors. This issue is of heightened importance with the impending significant increases in traffic occasioned by the expansion of the site to accommodate many of the services currently being provided at the Radcliffe Infirmary.

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## **3 COMMENTS ON APPROACH 1**

### **a) Sheet C2**

- i) We endorse the proposal for bus lanes and deeper bus bays. However, we believe that dialogue with Headington School is required for the better management of the buses bringing and taking pupils to and from the school. We suggest that such dialogue should explore the possibilities of loading and unloading within the school grounds for those buses providing services exclusively to the school. We believe that not only would this ease congestion, but also result in a safer environment for pupils to board and alight from school buses.
- ii) We endorse the proposals for new pedestrian crossings, a school safety zone and a new westbound cycle route between Brookside and Gypsy Lane. However, we are concerned that this cycle lane would be another shared-use pavement cycle lane. We trust that cyclists will be given priority as they will have to cross Valentia Road twice on this route.

### **b) Sheet D2**

- i) We endorse the suggestion for widened approach lanes to the junction of London Road and Headley Way, but are concerned at the impact on pavement widths in an area of residential housing, a large and popular public house and several hotels and guest houses.
- ii) We endorse the proposal for a school safety zone.

### **c) Sheet E2**

- i) We endorse the proposal for a 20mph speed through central Headington and are pleased to note that it includes a school safety zone at St Andrew's School.
- ii) We endorse the concept of pre-signals to give buses priority through central Headington.
- iii) We believe that unwarranted assumptions have been made about the use of Osler Road by buses. This issue has been the subject of intense debate and we will not rehearse those arguments again here. However, this matter is not resolved and we refute the implication of the study that the issue is now closed. Irrespective of our continued opposition to the use of Osler Road by buses, we believe that the proposals for the junction are flawed and would result in considerable difficulties for traffic seeking to enter New High Street from either direction on the London Road.
- iv) As we have stated in section 2, we believe that bus stops should be more widely dispersed across the present loading bays for both eastbound and westbound buses. We would also encourage the higher profile enforcement of parking restrictions in these loading and bus bays to ensure that legitimate use is not impeded by illegally parked vehicles.
- v) We do not support the proposal for a pedestrian crossing area at the junctions of Stephen Road/London Road/Kennett Road. Whilst the concept is admirable, in practice pedestrians would have to share the space with vehicular traffic. Although it has not been stated, we presume that the proposal to remove the existing subway is

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a direct result of the suggestion to narrow pavements to increase the depth of loading bays. We do not believe that this pavement narrowing is necessarily without complication as some pavements are on privately-owned land. We suggest that the subway should be retained with increased signage to draw attention to its presence. Not only is it a well-used and very safe way of crossing the road, but with its murals depicting scenes of Headington life it is a community resource valued by many.

## d) Sheet F2

- i) We have argued in section 2 for more imaginative proposals on bus management. If these were introduced then it might not be necessary to have so many bus lanes. These constitute the key proposals on this sheet.
- ii) Whilst generally supporting the introduction of eastbound and westbound bus lanes (should they be proved to be necessary), we are concerned at the impact that these would have on this long section of the London Road. Many people from the Risinghurst and Barton estates walk into Headington along this section of road and feel safe in doing so because of the wide pavements. In addition, at least sections of these pavements are used by children walking to St Andrew's School and patients visiting the large and expanding Bury Knowle Health Centre. Although busy, this stretch of road is relatively pleasant because of the number of trees along its length. Widening the carriageway and removing many of the trees would detract from the area and make the route less safe for pedestrians.

## 4 COMMENTS ON APPROACH 2 (Sheet G)

- i) We are very concerned at the comments at the right-hand foot of this sheet – viz.:  
*"If we were to take Approach 2 forwards it would require more detailed work. This would involve:  
Investigating the re-routing of traffic in the area and the potential impacts  
Looking at how to ensure residents and businesses could continue to access properties in the area of restricted access  
Further consultation with residents and businesses affected."*  
We believe that each of these three elements should have been undertaken as part of the study and assessing the viability of this option. We believe that the proposals for this approach are seriously flawed because of this acknowledged lack of attention to detail. In addition, no account appears to have been taken of other studies and proposals – e.g. the recent study into traffic flows in Old Road and the proposal to increase the extent of the Controlled Parking Zones in Headington.
- ii) We are surprised and alarmed at the proposal to site signs at the junctions with Marston Road and Headley Way to advise people to divert through Marston as an alternative to driving through Headington. The residents of Marston are already very concerned about traffic volumes, the use of their roads as 'rat-runs' and the resultant congestion. Many have recently supported and signed a petition calling for a freeze on any developments in the area that would lead to an increase in traffic. This proposal demonstrates a lack of integrated thinking and runs counter to the broader approach adopted by HAMATS. We believe that the solution to Headington's traffic problems does not lie in simply transferring them to Marston! Taking this proposal in

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conjunction with that to close London Road to most traffic between Stephen Road/Kennett Road and Old High Street/Windmill Road would almost certainly result in a significant increase in the amount of traffic travelling through the conservation area of Old Headington in order to avoid the traffic restrictions on the London Road.

- iii) We note the proposal to divert traffic at the junctions with Windmill Road and Gypsy Lane. Although there are no statements or proposals about what routes the diverted traffic should follow, the only realistic route from each of these diversions is into Old Road. We believe that this is the most contentious proposal in the study and that it is very seriously flawed. For instance:
- How will heavy goods vehicles such as articulated lorries successfully negotiate the tight corners at London Road/Windmill Road and Windmill Road/Old Road?
  - The section of Old Road between Windmill Road and Gypsy Lane is always busy and subject to severe congestion at 0800-0930 and 1600-1800. At these times traffic is often queuing between the junctions with Windmill Road and Lime Walk.
  - Windmill Road and this section of Old Road are bus routes. There is no provision for bus bays in these roads with the result that stationary buses already cause traffic queues. With increased traffic volumes these sections of road will frequently be at a standstill.
  - Starting the diversion at Gypsy Lane and following the route to the top of Windmill Road will take diverted traffic past:
    - The main entrance to Brookes University;
    - One of the main pupil entrances to Cheney School;
    - An approach road to the Churchill and Warneford Hospitals and the main base for Oxford City ambulances;
    - The rear entrance to the Park Hospital for Children;
    - An approach road to the main entrance of the Park Hospital for Children, the Churchill Hospital and the main base for Oxford City ambulances;
    - The rear entrance to the Nuffield Orthopaedic Centre;
    - The main entrance to the Nuffield Orthopaedic Centre;
    - A main approach road (Margaret Road) to Windmill Primary School;
    - Blanchfords Builders Merchants and A G Jacob Removals where heavy goods vehicles are frequently entering and exiting these separate establishments.
- iv) The proposal to close the London Road between Windmill Road and Kennett and Stephen Roads to all but buses, taxis, cyclists and pedestrians – and, by verbal confirmation at one of the exhibitions, emergency vehicles – will be very dangerous for pedestrians. As with the former arrangements in Cornmarket, vehicular and pedestrian traffic will be intermingled, with the attendant risks of injury to pedestrians. The impact of emergency vehicles cannot be minimised. London Road is the major route for ambulances from east of the city to the John Radcliffe Hospital campus. It is also used frequently by police and fire and rescue service vehicles.
- v) We note with interest the comparison of the proposal to restrict traffic in this section of London Road with the situation that presently obtains in the High Street, Oxford. It is widely acknowledged – including by the County Council - that the traffic restrictions

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in place in the High Street are frequently ignored. Are there any grounds to believe that the situation in Headington would be different?

- vi) If the closure of London Road between Windmill Road and Kennett and Stephen Roads to most traffic was implemented, it would be imperative to implement traffic restrictions in Headington Quarry at the same time. Without these, local traffic using the conservation area of Quarry High Street and Quarry Hollow as 'rat-run' links to Quarry Road and the top end of Old Road would increase dramatically.

## 5 SUMMARY

We agree that something needs to be done to improve traffic congestion and pollution in central Headington and to reduce the risks of accidents. We support the County Council in its endeavours to do this. We endorse many of the proposals in this study. However, we believe that some of the present proposals lack creative imagination and have focussed too much on seeking to improve the flow of the existing numbers of buses. The lack of published evaluation of the available data, coupled with no published analysis on an individual basis of the projected impact of each of the proposed solutions, means that it is impossible to judge whether all of the proposals need to be implemented. We believe that more thought should have been given to ways of reducing the number of buses using London Road. We also believe that in focussing primarily on issues associated with buses the study has failed adequately to address the wider transport issues involving pedestrians, cyclists and car users.

We are concerned at the proposals in Approach 2. There has either been insufficient thought to the implications of these proposals or those conducting the study are unaware of present issues that would be exacerbated by the adoption of the proposals.

Headington is a community. The very existence of HCDA reinforces this. We are concerned that many of these proposals would erode the feeling of community with the concentration on improving the flow of buses and thus creating a major thoroughfare.

Our greatest concern lies with the lack of publicity that the County Council has given to this study and these proposals and to the paucity and brevity of the consultation exercise. We urge the County Council to modify its proposals in the light of the comments received and then to represent them to the people of St Clements, Marston and Headington in a much more comprehensive manner.

*Headington Committee for Development Action, July 2005*

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Appendix A

## **Headington Committee for Development Action – Represented Organisations**

Barton Community Association

Central North Headington Residents' Association

Churches Together in Headington

Co-ordinating Committee of Headington Residents' Associations

Friends of Headington Quarry

Friends of Old Headington

Headington Business Association

Headington Community Association

Headington Schools Partnership

Highfield Residents' Association

New Headington Residents' Association

Nuffield Orthopaedic Centre NHS Trust

Oxford Brookes University

Oxford City Council – Councillor and Officer

Oxford City Primary Care Trust

Oxford Civic Society

Oxford Radcliffe Hospitals NHS Trust

Oxfordshire County Council

Oxford Swindon and Gloucester Co-operative Society

Wood Farm Community Association