FORMAL SUBMISSION• Statutory Non-Compliance & Severe Infrastructure Liability Main dossier [Thursday Street Corridor, SN25]

TO:

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3. Executive Leadership Team: (Martin Dean) martin.dean@go-ahead.com | Go-Ahead Group; (Ed Wills) ed.wills@gosouthcoast.co.uk | Swindon's Bus Company, talk2us@swindonsbuscompany.co.uk

COPIED FOR PUBLIC RECORD AND IMMEDIATE DEMOCRATIC ESCALATION TO:

The Chief Executive Officer & Parish Clerk

Haydon Wick Parish Council

Council Offices, Thames Avenue, Swindon, SN25 1QQ

Email: clerk@haydonwick.gov.uk

Councillor Vinay Manro | Chairman of Haydon Wick Parish Council & Ward Councillor for Priory Vale (SBC), vinaymanro@haydonwick.gov.uk / vmanro@swindon.gov.uk

All Elected Members | Haydon Wick Planning and Highways Committee

COPIED FOR INFORMATION TO:

Member of Parliament for Swindon North (Will Stone MP) will.stone.mp@parliament.uk

Swindon District Commander / Operational Planning Team Dorset & Wiltshire Fire and Rescue Service (DWFRS) buildingregs@dwfire.org.uk / enquiries@dwfire.org.uk

For the Attention of the Haydon Wick Parish Clerk:

This formal communication serves as a direct, explicit notification to the Highway Authority (SBC) and the Transport Operator (Swindon's Bus Company) of ongoing apparent statutory breaches, structural asset damage, and severe public safety hazards along the Thursday Street residential corridor.

To all other parties,

I am writing once again regarding the structural safety and traffic bottleneck issues on Thursday Street, SN25 area of Swindon. I am following it up now with CCTV evidence, clarification of my complaint and updated email addresses.

Outside London, local bus routes are deregulated, SBC retains the exclusive statutory responsibility to authorise the placement of bus stops. Therefore, SBC was fully aware of these route changes and actively authorised them. I have formally requested all information regarding the impact studies, equality or risk assessments etc, conducted prior to these route alterations. Given SBC's legal duty of care, these documents should exist, yet none have been provided. In fact, the FOI (FOI010652) request seeking that data was ignored by SBC, an ongoing statutory failure.

The timeline explains this silence. The active engineered hazard present today was initiated on 4 September 2022. According to the statutory network alteration notice published by Swindon's Bus Company on 18 August 2022, titled "Changes to routes and times from 4 September 2022", the operator explicitly stated:

"From 4 September Fleming Way will be closed for restructuring work. All buses will need to have a new timetable..."

In September 2023, SBC formally entered into a legally binding Enhanced Bus Partnership Plan with Swindon's Bus Company. Under this DfT-mandated scheme, the council acts as a co-signatory to protect the operator's financial and operational viability. This coincided neatly with the £33 million Swindon bus station project. These stops and routes were forced through precisely as SBC initiated the town centre bus station redevelopment works.
It is evident that SBC Highways actively facilitated a private bus company to reroute large vehicles through narrow, unsuitable residential streets as a frantic, short-term fix to manage town centre transit delays. What was initially introduced as a temporary diversion route has become a permanent fixture for two bus services. Which was also recently expanded via the temporary introduction of Route 11. It confirms that commercial operational metrics were being actively prioritised over documented residential safety concerns.

Were any duty of care checks carried out prior to adding the No 11 bus route to temporarily pass through the Thursday Street corridor? If so, my FOI should show them as well.

From 2006 to 2022, Thursday and Friday Streets were treated, designed, and occupied exclusively as a minor residential feeder road. The on-street parking standards under Swindon's current Technical Guidance on Parking Standards, 2 to 3 bedroom homes in suburban zones (Sector 3) require **2 spaces per dwelling plus 0.25 visitor spaces**. Thursday Street *already* operates below modern council minimums due to its 2006 PPG3 design. For 16 consecutive years, Thursday Street and Friday Street functioned exactly as was designed, as quiet, safe, residential streets. Neither SBC Highways nor the Swindon's Bus Company ever routed commercial buses through this corridor during this period. The network operated efficiently for nearly two decades without encroaching on this residential zone.

The current hazard is entirely man-made, manufactured overnight in 2022 as an un-audited quick fix to absorb town centre bus station delays. You cannot claim this layout is an unavoidable geographical necessity when 16 years of local highways history proves otherwise. It is a cheap shortcut implemented during the bus station crisis that they simply decided to keep because it saved them money on timetabling.
Ed Wills, the Managing Director of Go South Coast (Swindon's Bus Company) has stated in emails to myself, that the residents of Thursday and Friday Street asked for these changes to be made. He was unable to provide evidence to this when asked. He has also stated, that despite the written complaints and concerns, he and his company have no plans to change the No's 15 & 16 bus routes. After Ed declared the residents asked for these route changes, I submitted a FOI (FOI010688) request to SBC. Asking if indeed there is any evidence that a formal request by the residents of Thursday and Friday Streets was ever made prior to the changes in 2022. That FOI has also now passed its 20-day period to be answered.

• By introducing 67 daily multi-tonne movements in 2022 solely to accommodate town centre works, SBC didn't just tweak a route, they instituted a fundamental, permanent change of use to the highway network.

• Doing this without a formal Equality Impact Assessment (EIA) or a Traffic Risk Assessment or any form of safety check, is an explicit failure of their administrative duties. SBC, whether by intention or apparent incompetence, bypassed standard safety audits and public consultations to fast track this infrastructure, prioritising the operational schedules of a private company over the physical safety of Priory Vale residents and school children. Because the council actively installed these stops on streetlamps to facilitate this scheme, they hold total liability for the recurring gridlock, the blind-bend hazard and risks for school children and vulnerable pedestrians using the QE2 crossing.

The above stands as my Complaint. The following is where I believe Both the SBC and the Swindon's Bus Company are failing regulations and placing the residents and users of the Thursday / Friday corridor under unasked for and unwarranted risk.

STATUTORY AND REGULATORY BREAKDOWN

Driving on pavements or operating a vehicle in a way that endangers pedestrians on a footpath is a criminal offense under UK legislation (Highways Act 1835 s.72, Road Traffic Act 1988 s.34 and s.2/s.3).

These incidents have been reported to the DVSA, Office of the Traffic Commissioner (OTC) and the police. This is a direct consequence of SBC and the Swindon's Bus company's decisions. There is also the following:

1. Engineered Stopping Sight Distance Failures & School Safety Violations

The Department for Transport's Manual for Streets establishes that on a standard 30 mph residential road, a driver must have a clear, unobstructed forward view of at least 43 metres to achieve the required Stopping Sight Distance (SSD). The uphill horizontal S-bend configuration of Thursday Street falls dangerously short of this benchmark.
Due to the severe road curvature, the proximity of surrounding buildings, and unmaintained heavy foliage shielding the descent of the QE2 Landmark footbridge path, a driver heading uphill cannot physically spot a pedestrian approaching the crossing until they are 35 metres or less away.
This layout falls 8 to 10 metres short of the national DfT design safety standard required to stop a vehicle, a deficit that worsens for vehicles approaching from the opposite direction due to further structural (tall buildings) and foliage obstructions, and is even more restricted from the pedestrian's viewpoint.

Crucially, the council cannot claim this corridor operates as a low-speed environment: drivers are regularly witnessed exceeding the 30 mph limit due to frustration after being trapped behind Swindon's Bus Company vehicles, or while accelerating to 'beat' oncoming buses to narrow passing gaps. V=d/t is a formula I know how to work with and I have a month's worth of CCTV and fixed points to use.

Between 08:00–09:00 and 15:00–15:45, this crossing functions as a primary transit terminal for children attending Haydonleigh Primary School, Abbey Park School, St Francis Primary School, and Orchid Vale Primary School. Furthermore, I am entering it into the public record as an eyewitness fact, that school staff routinely use this crossing, to move structured columns of small children (aged 5 to 11) in file to access the public play park or transfer between school sites.

Despite this high-density vulnerable pedestrian usage, there is not a single warning sign, high-visibility marking, or amber beacon alerting drivers to a major child transit route after a blind bend

and uphill ascent. The Council (Haydon Wick or SBC) previously acknowledged this structural hazard by installing timber chicane barriers at the bottom of the QE2 footbridge path to intercept descending bikes and scooters. The physical danger is immediate: I am entering into the public record as a first-hand eyewitness statement that I personally witnessed a young boy on a bike, descending from the QE2 bridge, collide with the side of a passing vehicle at this crossing. Neither the child nor the driver had a chance of seeing one another in time. While the driver was traveling at a safe speed and the child avoided catastrophic injury, this incident confirms that the infrastructure fails both road users and pedestrians simultaneously.

To route 67 heavy commercial buses a day directly across the mouth of a substandard, blind crossing, knowing that organised columns of primary school children are herded through it regularly, constitutes a complete failure under the Safer Routes to School Policy and local parks access guidelines. Independent of route adjustments, this crossing is unsafe by design. I formally invite representatives from SBC Highways to inspect this location during peak hours to witness this exposure first hand. This site must be immediately audited for an emergency upgrade to a controlled Puffin or Zebra crossing before a fatal incident occurs. An Independent Pedestrian Crossing Assessment (PV^2 Assessment) should be carried out at the earliest opportunity as a minimum.

2. Operator Governance, Service Registration, and Driver Conduct (Liability Breach under the Health and Safety at Work etc. Act 1974)

• DVSA Earned Recognition & PSV Operator Standards: A Public Service Vehicle (PSV) operator has a positive, continuous statutory duty to monitor driver behaviour, route scheduling, and strict compliance with the Highway Code. Exhibits A1, A2, A3, C1, C2 and D1 & D2, document a critical systemic breakdown in corporate driver standards during a single 35-to-40-minute cascading gridlock event.
On 26/10/2026, 13:29hrs to 14:06hr, separate Swindon's Bus Company drivers actively coordinated a reckless manoeuvre where two bus drivers exited their vehicles to act as a banksman, guiding a reversing (bus Route 16) (Exhibit A2 @ 13:47 - 13:48) straight into a metal pedestrian crossing bollard. The impact completely tore out the public infrastructure asset (Exhibit D1 and D2), narrowly missing a street lighting column and a third waiting passenger bus. The photos of that bollard may look less than impactful, where in fact, that bollard now presents a hazard, should it topple into the road, onto a pedestrian or in the path of a cyclist. Who is liable I leave to you.

The entire 40-minute gridlock and subsequent using of the footpath by a private vehicle van driver was caused by the initial bus driver. The Swindon's Bus Company tactics are routine. Their bus drivers will use the size of their buses to wilfully force their way through this street, on the wrong side of the road, just prior to the blind bend. They do this due to the daily legally parked cars. When they meet oncoming traffic who are legally on the right side of the road, the bus drivers routinely stop the bus and refuse to move. This then forces the drivers who are on the correct side of the road to either reverse, taking the risk on themselves, or illegally mount the pavement (Exhibit A2 @ 13:39hr, Exhibit G @ 1733), in order to get past the bus.

Following this collision, the outbound bus (Town Centre route 15) resolved the final logjam by deliberately mounting and driving entirely along the public footpath (Exhibit C2 14:06 hrs).

The previous day 25/10/2026 at 16:04hrs, a Town Centre bus (16) mounted this same footpath to bypass another stationary bus (Exhibit H1), driving along the pedestrian path while a young family with a child walking a dog were moving directly toward the vehicle. If you watch to the end, you will see the bus the No 16 driver passed, ended up having to reverse back, due to build up of traffic.

On the 19/10/2026, two buses could not pass one another without one of them mounting the kerb and using the footpath (Exhibit H2 @ 07:48).

This repeated dangerous failure by multiple professional staff members represents a severe breach of operator governance, providing definitive grounds for a formal Public Inquiry under Section 26 of the Transport Act 1985.

The SBC Highway Authority and Swindon's Bus Company must note that every exhibit detailed in this index was captured within a narrow 16-day operational window immediately following the installation of a localized monitoring system on 3rd October 2026. This data does not represent a curated collection of anomalies over years; it represents a routine, high-frequency baseline.

• Traffic Commissioner's Guidance (Registration of Services), Section 3.1: This guidance explicitly dictates that a competent operator must ensure its timetables are "properly calculated, realistic and achievable". Continuous CCTV and mobile phone footage captures three separate commercial buses, two at the blind bend curve (Exhibit C1) and a third at the QE2 Crossing point (Exhibit A1 @ 13:31), completely locking up the street for 40 minutes. This proves that routing buses through Thursday Street is fundamentally unachievable without causing asset damage or continuous network gridlock. Running multi-tonne vehicles through a known urban pinch-point without an updated risk assessment violates the foundational principles of registering a viable local service. Both SBC and Swindon's Bus Company are aware of these risks, yet continue to ignore them.

• Public Service Vehicles (Conduct of Drivers, Inspectors, Conductors and Passengers) Regulations 1990 & Common Law Negligence: Bus drivers have a strict legal duty to ensure the safety of passengers and the public. Across the recorded footage, drivers have executed blind reversals that destroy street infrastructure, discharged vulnerable passengers onto unsafe live carriageways (Exhibit E1, showing an instructor onboard, and Exhibit E2, involving a mother with a pram; several additional incidents are available on request), and forced third-party cars onto the wrong side of a school crossing to escape a bus lockup (Exhibit A2 @ 13:39 & Exhibit A3 @ 13:52 onwards). Taken together, these incidents establish clear evidence of regulatory non-compliance and foreseeable operational risk.

• Section 3 Health and Safety at Work etc. Act 1974: The video evidence of a professional driver destroying a pedestrian crossing bollard, which could just as easily have been a child, paired with multiple separate incidents of commercial vehicles operating on the public footpath, proves that the operator's current routing system relies entirely on a zero-margin-of-error environment. By forcing multi tonne vehicles into a localized bottleneck that induces drivers to routinely eliminate pedestrian safety zones, Swindon's Bus Company and the SBC Highways Authority are apparently maintaining a system of work that actively exposes the public to an unmanaged risk, creating a clear liability breach under Section 3.

• Management of Health and Safety at Work Regulations 1999: Under these regulations, the bus operator has a strict obligation to treat high-potential near misses with rigorous internal investigation. The operator is required to formally review driver reversing protocols, visibility aids, and route scheduling to eliminate these predictable systemic risks.

• Formal Demand 1.1: Was the infrastructure damage recorded on 26/10/2026 formally reported through the Swindon's Bus Company internal incident tracking system?

• Formal Demand 1.2: Has a formal route hazard review been initiated?

• Formal Demand 1.3: Was the structural damage formally registered with the SBC Highways Asset Management department for third-party cost recovery?

3. Obstruction of Emergency Service Access (Impact on Fire and Rescue Services Act 2004, Section 11)

Under Section 11 of the Fire and Rescue Services Act 2004, the Fire Authority is under a strict statutory duty to take all reasonable measures to secure rapid operational access for emergency appliances. SBC's current operational routing has rendered the fulfilment of this statutory duty structurally unachievable along this corridor.

In the *Swindon Advertiser* (29 September 2026), regarding the suspension of Route 11 and 12 stops on Eastbury Way, Swindon's Bus Company General Manager Richard Tyldsley explicitly warned of the risk to emergency access, stating: *"It's worth noting that if we can't get through, neither can a fire engine"*, while noting the operator would consult with Swindon Borough Council to resolve the obstruction.

Despite Swindon's Bus Company publicly highlighting fire engine access as a critical concern in the local press, its own permanent routing of Routes 15 and 16, alongside the temporary diversion of Route 11 and SBC's failure to intervene, created the exact kerb-to-kerb gridlock that compromises 15-tonne fire engines and 26-tonne Aerial Ladder Platforms on Thursday Street.

This residential route features solid concrete pedestrian islands and zero grass verges or escape lanes. Because the bus movements routinely lock up the available 6.5-metre road width against lawfully parked vehicles, the layout ensures predictable, engineered gridlock. When these vehicular standoffs occur, vehicles are packed tightly kerb-to-kerb with no physical margin to clear an emergency path.

The physical reality is absolute: if a fire engine (15 tonnes) or an Aerial Ladder Platform (26 tonnes) from Swindon or Stratton stations needs to pass through Thursday Street to reach a time-critical incident in the wider Priory Vale area during one of these routine, bus-induced bottlenecks, its emergency response path will be completely compromised by the infrastructure layout.

• Urgent Review Demand: The Dorset and Wiltshire Fire and Rescue Service (DWFRS) must review this CCTV footage. Rather than conducting routine, off-peak familiarisation drives using a standard pumping appliance, DWFRS should execute an explicit "worst-case scenario" swept-path re-enactment. This must assess what occurs when an Aerial Ladder Platform (ALP) meets an oncoming transit bus on the blind curve while standard residential parking is occupied.

• Sub-Surface Risk: Fire appliances weigh significantly more than transit buses. Forcing these vehicles to mount footways to bypass a bus-induced gridlock introduces severe structural risks. The pavements along Thursday and Friday Street sit directly over waist-deep BT Fibre cable tunnels and primary water/electrical mains. These footways were never structurally designed or rated to accommodate the axle-load passage of multi-tonne commercial or emergency vehicles, introducing a secondary catastrophic risk of utility collapse.

4. Highways Maintenance Liability (Highways Act 1980, Section 130)

Section 130 of the Highways Act 1980 dictates that the SBC has a strict statutory duty to assert and protect the rights of the public to the use and enjoyment of any highway, ensuring it remains free from persistent obstruction. By authorizing a high-volume route and installing roadside infrastructure that creates a predictable, engineered bottleneck (Exhibit F1 & F2, plus many more on request), the bus stops and has absolute clearance to safely pull up to the kerb correctly, yet fails to do so and blocks traffic from both directions, the Council's statutory liability protection is severely compromised.

The physical dimensions of Thursday Street make simultaneous bidirectional bus transit a geometric impossibility:

• The total carriageway width is 6.5 metres (There are parts where the street is wider, however, the blind bend measurements on the whole are 6.5 metres).

• Standard, lawful residential street parking occupies 1.8 metres minimum of that width.

• A standard commercial transit bus is 2.55 metres wide, excluding wing mirrors.

• When two buses attempt to pass each other adjacent to a parked car, a minimum of 6.9 metres of physical road space is required. Due to the 12-metre length of these buses, more room is required due to the curvature of the road, well over 7 metres is required.

With 67 scheduled daily bus movements for Routes 15 and 16, the layout ensures near-constant, predictable obstruction. There is no inherent defect in the original design of Thursday Street; from 2006 to 2022, it functioned exactly as intended for a quiet residential feeder road. The current hazard exists solely because SBC Highways and the Swindon's Bus Company forced high-volume, multi-tonne commercial vehicles through a corridor that was never designed to accommodate them. To use the bus time schedules to try and say these buses never meet at that point is already dismissed, using your own reported timekeeping. The Swindon's Bus Company timekeeping records show that the routes 15 and 16 are regularly failing to remain on schedule. Below the required minimums in fact.

Failure of Section 122 Operational Duties (Road Traffic Regulation Act 1984)

While a public service vehicle stopping to board or alight passengers is an ordinary use of the highway, the SBC's ongoing authorization of a high-volume timetable through an engineered pinch point violates its strict operational duty under Section 122 of the Road Traffic Regulation Act 1984.

This layout actively forces oncoming vehicles to reverse, mount the footpaths, or veer into opposing traffic lanes around concrete pedestrian islands on a blind horizontal curve route (Exhibit C2 @ 13:52 onwards). This represents a severe breach of the statutory duty to secure the expeditious, convenient, and safe movement of vehicular and pedestrian traffic.

Now that the state-of-the-art town centre infrastructure at Fleming Way is fully operational, the overarching convenience metric of the network has been satisfied. Maintaining this high-frequency routing through a minor residential street is no longer a rational balancing of interests under Section 122; it is an unmanaged operational risk that prioritizes commercial timetables over public safety.

5. Siting of Stopping Places and Infrastructure Failure (Bus stops at Street Lighting Columns 4700 11 and 12)

I am not challenging the road-legal nature of the commercial buses; I am challenging the active structural alteration of the highway asset by SBC.

SBC explicitly authorized and physically installed bus stop plates onto street lighting columns 4700 11 and 12, named Eyre Close. By designating and siting these stopping places under the Road Traffic Regulation Act 1984 on a narrow residential street to facilitate a high-volume transit loop, the council

actively created an engineered choke point. SBC breached its statutory duty because it failed to demonstrate "due regard" under the Public Sector Equality Duty for the safety risks created for vulnerable groups by placing high-volume transit stops along a narrow residential S-bend.

A local authority must ensure that roadside infrastructure is safely and accessibly sited. Authorizing these specific bus stops along the Thursday Street corridor, where physical constraints prevent buses from pulling flush to a designated, accessible kerb, or placing them directly on blind corners, forces transport operators into an operational layout that violates PSVAR boarding and alighting standards.

Because of the continuous legally parked vehicles opposite these columns, these stops act as immediate, predictable road blocks whenever a bus pulls up. The clear impracticality of these locations is definitive proof that no impact study or traffic risk assessment was ever conducted prior to installation. This engineering failure sits solely at the feet of SBC. Under the Traffic Signs Regulations and General Directions (TSRGD) 2016, bus stop signs and road markings require formal highway authority authorisations. The ongoing failure of SBC to produce any checks made prior to authorisation, under active FOI requests, indicates a major gap in proper administrative authorisation.

6. Procedural Maladministration: Evidence of Information Suppression

The administrative and safety planning metrics underlying this entire routing layout are currently subject to two active statutory investigations under the Freedom of Information Act 2000. The SBC's handling of these requests demonstrates a clear pattern of administrative fault:

Case Reference FOI010652: Seeking the disclosure of localized Traffic Risk Assessments, Road Safety Audits (RSAs), and impact studies. SBC has formally conceded in writing that its statutory 20-working-day deadline (26 October 2026) has been breached. A formal internal review is currently underway, with a statutory compliance deadline of 24 November 2026.

Case Reference FOI010688: Seeking all documentation, surveys, or petition logs regarding the operator's explicit defence that the routing loop was implemented due to "resident requests." The statutory compliance deadline for SBC to produce these records was Thursday, 5 November 2026. That date has passed and SBC have claimed my request is too complex and requires an extension. Under FOIA Section 10(3), extensions apply only to the public interest test, not administrative complexity, meaning SBC cannot lawfully extend the deadline unless it has formally reclassified the request under the Environmental Information Regulations 2004 (EIR). The SBC's failure to comply with statutory response times indicates an administrative deficit. SBC and the Swindon's Bus company have easily trackable systems that should immediately show if any such records exist.

The systematic withholding or nonexistence of these mandatory impact documents indicates that both the SBC and the Swindon's Bus Company are operating without verifiable data baselines or authorised safety audits to justify the ongoing use of the Thursday Street corridor.

SBC cannot claim to have balanced safety and convenience under Section 122 of the Road Traffic Regulation Act 1984 when it bypassed public consultation, failed to notify residents, and implemented a permanent change of network use in secret. This lack of transparency constitutes an explicit abuse of administrative discretion. SBC and the Swindon's Bus Company are hereby placed on

formal notice that their current operational framework stands in active conflict with statutory regulations.

When confronted by the residents, via a meeting held at Haydon Wick Parish council in 2022, the alleged defence of SBC's actions was "If these routes are blocked then the Swindon's Bus Company will withdraw the routes altogether, as they are commercially unviable" https://haydonwick.gov.uk/tag/bus-service/. Note, there was no suitable resolution made. The situation went from a temporary change, to a permanent one. While the record indicates SBC distanced itself from the bus company's operational decisions, SBC simultaneously subsidised the service and approved the related highways applications.

If it were the case, that the old bus routes were unviable, both SBC and the Swindon's Bus Company will have readily available empirical data to prove that. Given those routes existed and seemed to run just fine from 2006 up to the changes in 2022.

Conclusion:

I appreciate and acknowledge that for many of you, these issues are inherited from previous administrations or leadership. However, I hope you take the opportunity to formally address the issues and correct the actions and failings of the past, before an unfortunate incident occurs. Consider the fact that the imagery provided as evidence, was all collected from a single CCTV camera and my personal mobile phone. In under a full calendar month of installation. I have not even reviewed all the footage; I simply picked out the ones that jumped out immediately to me.

Finally, as SBC drafts its statutory Bus Network Accessibility Plan and updated Enhanced Partnership Plan ahead of the 31 March 2027 government deadline, it must enforce residential rights and public safety rather than granting Swindon's Bus Company *carte blanche* to prioritise commercial profitability over documented safety hazards. These ongoing hazards violate your strict operational duties under Section 122 of the Road Traffic Regulation Act 1984 and fail the *Wednesbury* principles of administrative rationality.

To facilitate a resolution, I propose the following risk managed solutions based on established health and safety principles, specifically the duty to reduce risks so far as is reasonably practicable (SFARP):

Primary Solution: Revert to Pre September 2022 Alignments. The most direct remedy is to return Routes 15 and 16 to their proven, historic alignments utilising the wider distributor road network. These routes operated safely for 16 years without encroaching on minor residential feeder roads. Commercial convenience and timetabling metrics do not legally supersede public safety. This is the obvious easiest thing to do. You moved the routes overnight when you initially changed them in 2022.

Technical alternatives: Consolidate infrastructure and relocate stopping places. If the SBC Highway Authority attempts to maintain these routes, the existing roadside infrastructure must be immediately altered to mitigate the engineered hazard:

1. Decommission the Kopernik Road Stop: Remove the unnecessary outbound stop at the Kopernik Road junction entirely, to eliminate an artificial stop-start obstacle.

2. Relocate Eyre Close Stops away from Columns 4700 11 and 12: Siting high-volume transit stops on opposite sides of a tight, blind S-bend represents a major design flaw. These positions must be abandoned.

3. Establish a consolidated hub at the QE2 Crossing: Move the remaining stopping points to the wider section of road near the QE2 footbridge crossing. I have several recordings of the No's 15 & 16 buses already using that crossing point to disembark passengers, rather than use the actual Eyre Close column 4700 11 bus stop. Proof even the Swindon's Bus Company's own drivers find those bus stops a hazard. This section must be modified concurrently with an emergency highways audit to install a controlled Puffin or Zebra crossing, securing a safer environment for boarding passengers and crossing school children. Leaving that section as it is and making it a bus stop area could create safety issues. The modifications can probably be funded under the safer routes scheme.

4. Alternative relocation to wider corridors: Alternatively, shift the inbound (Orbital loop) stop further along Thursday Street to the wider section immediately preceding the Friday Street junction. The outbound stop should be shifted to where Thursday Street joins Torun Way, almost opposite where the actual original and named Thursday Street bus stop is on Torun Way. The road width expands significantly and lawful residential parking is minimal. This layout moves the active stops off tight, blind bends entirely.

To pre-empt any thoughts of trying to obfuscate the errors induced by SBC, you cannot retroactively strip residents of lawful parking spaces to fix an operational routing decision that was implemented in secret without any apparent sort of assessment. If 12-metre rigid buses require the elimination of established residential parking to manoeuvre safely, you are publicly admitting that the route choice itself violates basic highways architecture. In any case, even with vehicles not parked on that blind bend curve, you will still have issues of large vehicles being able to pass one another and the QE2 bridge crossing liability remains the same problem.

Yellow lines do not fix an engineered horizontal curve or an uphill blind school crossing. Implementing parking restrictions does not make the route viable; it simply shifts the penalty of a failed council diversion scheme onto tax-paying homeowners.

The Haydon Wick Parish Clerk is copied to ensure this formal representation and its accompanying evidence and CCTV log are submitted for formal consideration at the Planning and Highways Committee meeting on Tuesday, 24th November 2026, and inclusion in the correspondence record.

I expect a coordinated, transparent response from the executive leadership teams of both SBC and the Swindon's Bus Company within 15 working days, acknowledging receipt of this dossier and confirming that these materials have been successfully transferred to your respective risk, infrastructure, and liability teams.

Regards,

Kevin Fitzgerald MBE
Signed electronically: /s/ *Kevin Fitzgerald MBE*

Full Name: Kevin Fitzgerald MBE
Capacity: Resident (No. 66 Thursday Street, Swindon, SN25 1SR)
Date: 14 November 2026