Annex 3 – Open Roads for Oxford_Reconnecting Oxford - officer response

Purpose

1. This annex contains responses to the key themes in the consultation response documents submitted by Open Roads for Oxford Ltd (OROL) and Reconnecting Oxford. The themes from the two organisations were very similar so a combined response has been provided. Therefore, this response largely follows the document entitled *'Open Roads for Oxford Ltd response Oxford temporary congestion charge for cars consultation'* and appendices (in Annexes 21, 21a, 21b, 21c and 21d). It generally uses those 'headings' for ease of reference and should be read in conjunction with that document. Where necessary, it has been supplemented with responses to other matters raised by Reconnecting Oxford (see Annex 22). It is not intended to respond to all points made or answer all questions but gives a commentary on the main themes.

Background, clarification and principle of the scheme

2. When reading this document, it is important to consider a key principle central to both the traffic filters trial and the temporary congestion charge which is that they aim to reduce congestion not at the filter or charge point itself, but elsewhere in the network. For example, the Marston Ferry Road congestion charge is placed where congestion is minimal and it is not a primary bus route. However, reducing through-traffic here helps manage capacity at major junctions with Banbury Road and Cherwell Drive. This is expected to reduce delays to buses as well as allowing signal rephasing that can prioritise main routes and potentially create better conditions for buses, pedestrians, and cyclists—such as a dedicated crossing on the Marston Ferry Road near The Cherwell School, heavily used by school children. This approach applies equally to all filter and congestion charge points even though the level of traffic, bus use, and presence of pedestrians and cyclists will invariably be different depending on the location.

Reduce traffic

3. Oxfordshire County Council has submitted evidence of mode shift and reassigned traffic in the 'Modelling and Income forecasting' report.

4. Whilst it is accepted that some people cannot or will not alter their travel habits (it has never been claimed everybody would), not everybody needs to change their travel habits all of the time. Only small changes by a lot of people will make big differences. This will often make even car journeys, for those that need or choose to continue driving, better.

5. Although the examples below are not direct comparators it is useful to look at experience from other cities. When the London congestion charge was first introduced, traffic entering the zone during weekday charging hours dropped by 18%, and overall congestion was reduced by 30%. The New York congestion

charge scheme, introduced in January 2025, reduced traffic by 11% and increased speeds by 15% in the central business district. Bus patronage rose by 12%. Oxford's proposals are 'softer' given the number of exemptions and day passes, including residential day passes, so it is not expected that similar reductions in traffic will occur right across the network. Currently, the traffic reduction in the summer holidays is typically in the region of 8 to 10%, which leads to demonstrable improvements in bus journey times. So achieving improved bus journey time reliability should be achievable with the current proposals. Sumer holiday traffic levels is something that few people would argue against.

6. Claiming that weather means people cannot switch to walking, cycling and public transport is clearly unsubstantiated. Large numbers of people in Oxford already cycle throughout the year. Nordic countries, such as Denmark and the Netherlands, with high levels of cycling, often have colder, wetter, snowier and windier weather conditions. People in these countries also have to carry "heavy and/or important items".

Make bus journeys faster and more reliable

7. Oxfordshire County Council does not contend that traffic will reduce everywhere. Quite the contrary, we have published evidence that suggests traffic will increase in some locations. However, it is expected that traffic will be reduced where it is needed on important corridors for walking, cycling and buses. Whilst it is accepted that bus journeys may be slightly slower when approaching and/or crossing the ring road, bus lanes are often already in place to minimise this impact. The Modelling and Income Forecasting report indicates that traffic reassignment will occur. This does not necessarily mean that congestion will increase overall. However, the transport modelling predicts there will be mode shift, reducing car traffic overall.

Allow for new and improved bus routes

8. Congestion results in worsening bus journey times. To manage this, bus operators typically add more buses and drivers to maintain the frequency and reliability of an affected service. The bus operators have indicated that, due to a reduction in traffic expected through the congestion charge scheme, they can reduce the number of buses and drivers on some routes and redeploy them at no additional cost, in order to improve and add in new routes. Whilst this information is commercially sensitive at present, the bus operators will be able to confirm the principle.

9. As demand grows for bus services, within and outside the city, the bus operators can respond to this demand by extending, amending and/or adding in new services – creating a virtuous circle of growth as opposed to the vicious circle of increased congestion and worsening provision.

10. The charges are expected to reduce traffic over a wide area of Oxford city as Figures 3-2 and 3-3 in the Modelling and Income Forecasting Report. These Figures also show where there may be increases or limited change in traffic flows. The charges at St. Clement's Street are expected to significantly reduce traffic using this route (as would be expected) as shown in Figures 3-2 and 3-3. This will result in an improved junction performance at The Plain as well as London Place. This will be same at other locations, such as Abingdon Road and Thames Street, Banbury Road and Marston Ferry Road, Garsington Road and Hollow Way, Cherwell Drive and Marston Lane to name a few. Seeing the charging locations in isolation misses the point that the impacts are intended to be strategic and city-wide (noting that the Botley Road is currently closed).

11. The LTNs do not block buses on the Abingdon Road. Congestion is caused by traffic – that being too many vehicles in a finite space. The least efficient form of transport is the single occupancy car. To reduce congestion, a reduction in traffic is needed. According to the 2011 Census data for Oxford city, driving a car or van accounted for 32% of all commuting trips made by residents aged 16 to 74. Many very short car trips could be undertaken by alternative modes.

12. Encouraging more traffic by opening up more roads will not reduce traffic in an urban environment with finite space, but invite more people to drive i.e. creating more traffic. All at the same time, creating more congestion, making buses slower and walking and cycling less attractive. High traffic volumes in close proximity to cyclists is one of the main deterrents to cycling. We know cycling is one of the healthiest forms of transport for physical and mental health – the deterioration of both is adding to the pressure on NHS services.

13. Creating healthy environments is a key policy goal. If the car continues to dominate urban environments, health outcomes will not be achieved. Walking and cycling are also relatively cheap compared to other modes.

Buses in Oxford – Solutions (Appendix 4 -Reconnecting Oxford)

14. The county council has been clear that the location of traffic filter (and now congestion charge) points is primarily related to enabling traffic reduction which benefits buses throughout the city, rather than solely the individual bus services which may pass through them.

15. Therefore, arguments that state that the location of these points do not benefit buses, or sufficient numbers of buses, are incorrect, irrelevant and have fundamentally misunderstood the purpose of the scheme.

16. The traffic filter scheme has been a central part of the council's transport policy since 2015, long predating any aspirations for the provision of electric buses. Given the need for large scale private investment to procure the new buses, the bus operators requested that the bus productivity enhancements from measures already enshrined in our policy should be implemented. As the traffic filter

scheme has been unavoidably delayed, the proposed interim congestion charge would assist in delivery of this policy aspiration.

17. The congestion charge points operate as a 'package' to provide maximum overall scheme benefit by reducing traffic across the network. It is not possible to pick and choose between them depending on the number of buses which pass through them. As consistently stated, the principal benefit of the scheme is traffic reduction which benefits all buses across the city and – in many cases – county. The location of the points has been carefully considered through modelling outputs.

18. Even though the point about the location of the congestion charge points is wholly unsubstantiated, it is worth pointing out that:

    - Marston Ferry Road is served by three bus routes – the 14, 700 and H2 – which together provide up to six buses per hour. It is expected that the proposed congestion charge scheme will facilitate the delivery of an even higher frequency of service in the future

    - St Cross Road is served by three bus routes – the CS1, ST1 and ST2 – with a combined frequency of up to nine buses per hour.

19. Neither frequency could be described as a 'handful' in the wider context of bus provision.

20. Bus operators are required by statutory guidance to provide timetables which are robust and have the ability to be adhered to under all circumstances. The current target is:
    - on non-frequent services, 95% of services to be no more than 5 minutes late or 1 minute early at registered principal timing points; and
    - on frequent services (those with 6 buses per hour or more), 95% of services to operate at this standard and for intervals to be no longer than 15 minutes.

21. These apply regardless of term or holiday time, weather conditions, street works, or any other factor which can affect bus journey times and reliability. Operators can be subject to penalties from the Traffic Commissioner should these targets not be met.

22. Whilst late running is clearly undesirable, arguably worse is early running. Timetables with a buffer for congestion can lead to lengthy waiting times at intermediate bus stops, which is inconvenient and frustrating for bus passengers (and potentially motorists if the bus stop is on-carriageway).

23. Congestion takes place at any time of day and has a deleterious impact on bus journey times and resource requirements. Even a regular delay of a couple of minutes can mean that additional resources are needed to maintain the same level of service – as an example, route 9 between Risinghurst and the city centre was withdrawn because it became impossible to provide it in an hour's bus

cycle. This is a real-world example of how congestion can lead to poor outcomes for bus passengers, which the council's transport policy seeks to address.

24. Overall, reliability and predictability are key in ensuring effective bus operations and managing congestion is a key part of this. The congestion charge scheme will make journey times shorter and more predictable and ensure that operations can be planned in a way that means buses make good progress, passengers are not frustrated by unnecessary delays and public transport remains relevant in journey time terms against the private car.

25. The extended closure of Botley Road has been highly disruptive to bus services. Far from 'not intervening', the council has been required to provide financial support to the bus services to Botley, Harcourt Hill, Eynsham and Abingdon via Wootton, to maintain these links during a reduction in patronage caused by the closure. This is funding that would otherwise have been used for service improvement.

26. The correct frequency of buses on Abingdon Road, from 31 August 2025, is up to 24 per hour.

27. Traffic using London Road, Cowley Road and Iffley Road will be reduced by the St Clement's Street and St. Cross Road congestion charge points as there will be no outlet for these journeys to city centre car parks or other destinations across the city. This is a fundamental point consistently misunderstood throughout the responses.

28. The congestion charge proposal, like the traffic filter scheme, is not for the benefit of the bus companies. It is for the people using the bus companies' services, residents of Oxford, wider Oxfordshire, and visitors to the city, and indeed even those who do not, who will benefit from clearer roads and cleaner air.

29. 32% of Oxford's households have no car or van. In total, more than 50% of city residents walk, cycle or use a bus to access work, all of whom will directly benefit from this scheme.

30. In response to some sections of road seeing increases in traffic as a result of the scheme, it is inevitable that any proposal such as this will have more beneficial outcomes in some areas than in others. The council has taken the view that the scheme as a whole will have a net positive benefit and that the improvements in traffic congestion, air quality and the enhancements to bus services, active travel provision and the quality of the public realm facilitated by the scheme have significant weight.

31. Impacts on individual bus services vary by route, but overall, it is envisaged that the bus operators will be able to reduce the number of vehicles it uses on the services currently employed and therefore reinvest that resource into new and improved connectivity across the city.

32. For all the reasons identified above, the ‘conclusion’ in paragraph 14 (Appendix 4 -Reconnecting Oxford) bears no resemblance to the actual benefits the council expects to accrue to bus services in the city, and which have been demonstrated by the modelling work associated with the scheme.

Hospital Park and Ride

33. The county council works very closely with all Oxford’s hospitals. During the consultation, the county council engaged with more than 1,400 employees that work in the healthcare sector. Many car journeys to the hospitals will not be affected by the proposals as they will not need to divert from their current route. Access to all hospital sites will be maintained without having to pass through a congestion charge point. For some, this may be a slightly longer distance but may take slightly less time.

34. All hospital sites are accessible by public transport – the John Radcliffe is served by no fewer than 10 bus services with direct links from 3 P&R sites. Many local bus services serve the hospital sites not just P&R ride buses e.g. the X32 and X3 from Redbridge, and the 14 from Oxford railway station. Other services use London Road a short walk away, including frequent and direct links from Wheatley and Thame.

35. Frequencies on services to the hospitals have been consistently improved in recent years, and from September 2025 there will be up to 14 buses per hour from the John Radcliffe Hospital to the city centre, 11 per hour to Cowley, 6 per hour to Summertown, 3 per hour to Abingdon and Didcot, 2 per hour to Witney and 1 per hour to Bicester.

36. In terms of Park & Ride services, there are up to 5 buses per hour from Redbridge, 4 buses per hour from Thornhill and 2 per hour from Oxford Parkway. These are, particularly in the first two cases, good levels of frequency and a percentage comparison to bus levels towards the city centre is of no relevance – particularly when frequencies to the city centre are so high. Improvement in service levels from Oxford Parkway are likely to be a direct consequence of the scheme.

37. Both the Churchill Hospital and Nuffield Orthopaedic Centre are better served by bus than ever, with numerous direct connections with the city centre and the main district centres.

38. A map of services to the hospitals is available at https://www.mybusoxfordshire.org.uk/discover-oxfordshires-bus-routes-with-our-maps. This comprehensively shows that the statement “patients and their visitors to the hospitals in Headington are poorly served by public transport” is fundamentally untrue. It is congestion that makes bus services to the hospitals poor.

39. Previous discussions with the Hospital in 2022, which included an analysis of postcode data, have indicated that they are most interested in Thornhill as a park and ride site linked to the relevant sites, which lies on the east-west corridor referred to. They were also particularly interested in improved links from the Cowley area and to/from Oxford station.

40. From 31 August 2025, there will be up to:

- six buses per hour between Redbridge and the JR Hospital;
- four buses per hour between Thornhill and the JR/Churchill Hospitals directly, with up to six per hour more within a short walk;
- two buses per hour between Oxford Parkway and the JR/Churchill Hospitals; and
- eleven buses per hour between the Cowley Centre and JR Hospital.

41. Services on all of these corridors are currently expected to benefit from operator reinvestment arising directly from the scheme. Without the scheme, these improvements to services are not possible.

42. The council is aware that constraints on parking at the hospital sites, aligned with the Trust's policy on parking permits, means that buses are a more attractive option. The Trust has partnered with the two main bus operators to provide free travel for staff on park and ride services to further incentivise travel.

43. Frequent and well-used bus services rarely rely on one source of income. The most successful routes blend several sources of demand to ensure that services can cover their operating costs and offer as high quality a journey experience as possible. Operating services between park and ride sites and the hospitals directly, with no stops in between, do not meet these requirements. Contrary to paragraph 26, there is no guarantee that a shorter journey will automatically result in commercial viability – and if it did, it would already be happening.

44. Journey times of bus and car between the two main park and ride sites and the JR Hospital can be summarised below:

	Car (without traffic)	Bus (off-peak)
Thornhill	10 mins	14 mins*
Oxford Parkway	12 mins	21 mins

* also peak timetabled time

45. The above indicates that in the case of Thornhill, it is likely that when the requirement to park is taken into account, door to door journey time to the main entrance of the hospital is likely to match or better that for private car journeys.

46. Buses on route 600 already take the most direct route from Thornhill to the JR Hospital – via London Road and Osler Road, using the bus gate to access the hospital site. This is a shorter route than the equivalent journey by car, which is

required to use Headley Way. In a scenario where traffic is reduced on London Road by the congestion charge, the council expects journey times to fall in a commensurate manner.

47. For Oxford Parkway, it is acknowledged that bus journey times are longer because existing services operate via Summertown instead of via the A40 and Marsh Lane. However, the door-to-door journey time will be much closer to that of the private car because of the delays caused by the requirement to park and walk to the hospital entrance.

48. The proposed congestion charge point on Marston Ferry Road will make journeys between Summertown and the JR Hospital more reliable and shorten journey times, particularly in the peaks. A direct journey via the A40 arising from amendments to existing buses would result in a loss of connectivity between Summertown and the hospital, which would need to be addressed.

49. Use of the Barton Park bus gate for express services would require significant capital costs to make a suitable left and/or right turn into Northway. The county council is investigating this from an engineering perspective. Even if it is practically feasible, the respondents note the significant increase in bus movements on Foxwell Drive as a potential barrier to this option. This would need to be taken into account.

50. Neither of the bus companies has reported seat capacity issues with bus services between the park and ride sites and the hospitals at peak times, even with the free travel scheme in place. Therefore, this is not considered to be a barrier to usage of the service. The proposed congestion charge scheme will provide for capacity enhancement on the relevant services, and indeed new services, to create headroom for future improvement.

51. The question remains. how would such a comprehensive network of express services and/or additional capacity on existing services be paid for. Given that the respondents are opposed to schemes which may raise revenues for service improvements and/or reinvestment of existing resources, it is difficult to see how this could be achieved.

52. If Open Roads for Oxford and Reconnecting Oxford are serious about new and improved bus routes, they should support traffic reduction so buses can be faster and cheaper with new and improved routes as a result.

Make walking and cycling safer

53. Again, the county council does not claim to reduce traffic everywhere. However, where there are more vulnerable road users (generally closer to city and town centres. For example, some 12,000 cycle trips are made across the The Plain on a daily basis). This will not be the case for example, the Wolvercote Roundabout. Although, given the level of housing growth expected in Cherwell, we would hope to see an increase in cycle numbers across this junction.

However, on the Wolvercote Roundabout, there is space to provide cyclists, with a form of segregation from motor traffic. This is not the case for The Plain or St. Clement's or the Iffley Road where there simply is not the space for cycle or bus lanes. Therefore, the only intervention is to reduce speed and, more importantly in this case, traffic.

54. The Woodstock Road example is a very good one. The county council would like to reallocate road space from buses to cyclists, so that they can be fully segregated for large parts from both pedestrians and general traffic. However, this cannot be achieved without reducing traffic so as not to slow buses using the general traffic lanes. If Open Roads for Oxford and Reconnecting Oxford are serious about pedestrian and cycle safety, it should support traffic reduction so that infrastructure can be provided for these vulnerable road users.

Reduce local air pollution

55. The county council has never claimed that the temporary congestion charge or traffic filter proposals would improve air quality everywhere. Certain areas will see increased traffic flows, if not always increased congestion, which could be said to increase levels of N02. However, air quality becomes more of an issue where there are receptors. Given there are fewer active travel users on the ring road and its approaches, as well as fewer residential properties nearby, the impact will be lessened even where N02 levels could rise. This cannot be said to be true of the Abingdon Road and St. Clement's Street, where we expect significant improvements. Whilst Woodstock Road is expected to have an increase in traffic flows, with proportionate increase in N02, this is expected to rise as worst case to 18.5 µg/m3, well below the national and, indeed, the local target. Whilst there is no safe level of air pollution, with properties set back on the Woodstock Road, the impact due to receptors would not be as affected as those towards the city centre. There is expected to be more areas with air quality improvements, where they are needed most, than increases in pollution due to the temporary congestion charge.

56. This is confirmed in the city council's air quality action plan (2021-2025), which states "Without the delivery of key schemes such as the Oxford Zero Emission Zone and Connecting Oxford [trial traffic filters and WPL], we are unlikely to meet the local target".

57. Reconnecting Oxford's main report (see Annex X) repeatedly challenges the validity of the pollution modelling by Ricardo. The NO2 concentrations for the DS-RUC1 and DM-BR scenarios were calculated through comparison of AADT with the DMT1 scenario which had full air dispersion modelling. The performance and uncertainty of the dispersion model was evaluated by calculating the Root Mean Square Error (RMSE) for the observed vs predicted NO2 annual mean concentrations for a 2022/2023 baseline. Technical Guidance LAQM.TG(22) 7.584 states that a RMSE less than 10 µg/m3 is acceptable and 4 µg/m3 is ideal. In this case the RMSE of the model was calculated at 4.0 µg/m3 and therefore the model is performing well.

58. The approach taken in the technical note is a reasonable approximation of the change in road NOx that is directly proportional to the change in AADT along modelled road links. In some locations there will potentially be differences between the measured and modelled concentrations, however the uncertainty in the air dispersion modelling was shown to be statistically low.

59. The air pollution monitoring sites selected were of particular interest either due to their proximity to roads with the largest changes in AADT between the DS-RUC1 and DM-BR scenarios or due to their geographic location to gain a diverse representation of monitoring sites. Changes in AADT for roads not included in the main data tables can be observed in Figures 3-1 and 3-2.

60. The discrepancy between air pollution and traffic monitoring sites will be due to the different locations of monitoring equipment. For example, the London Road discrepancy highlighted by Reconnecting Oxford, the location of the air pollution monitoring site as shown in Fig 3-3 of the report is on London Road west of Windmill Road and the volume is in one direction only. The county council's traffic count is on London Road adjacent to the Ring Road and is in both directions combined. Both directions of traffic were included in the model. The scaling factors were derived using data from the side of the road nearest to the monitoring location.

61. Reconnecting Oxford challenges the use of air quality baseline and model validation. A 2022/23 model validation was applied using 2022 air quality monitoring and meteorological data and the 2023 traffic model data. The 2023 traffic data was determined to not be representative of traffic conditions in 2023 because it does not include the Botley Road closure, and so would not be aligned with the air quality monitoring measurements in 2023. 2022 was unaffected by the Botley Road closure and so the 2023 traffic data was more closely aligned with conditions in that year. Therefore, it was determined to be more robust to use the 2023 traffic data as a good measure of what was happening in 2022 and validate with 2022 air quality monitoring and meteorological data.

62. Reconnecting Oxford challenges the air quality technical note for not considering changes in the composition of the vehicle fleet (e.g., increase in electric vehicles) in its modelling. The NO2 concentrations for the DS-RUC1 and DM-BR scenarios were calculated through comparison of AADT with the DMT1 scenario which had full air dispersion modelling. DMT1 was modelled using a 2025 Oxford fleet developed from ANPR data recorded at locations across the city and includes electric vehicles.

63. Reconnecting Oxford challenges using calculations and assumptions to simulate 2025 air quality data instead of using actual, available measured data from 2024. The application of modelled data enabled the assessment of the two potential future scenarios DM-BR and DS-RUC1. The air dispersion model was validated through comparison with measured data.

64. Reconnecting Oxford asserts that the congestion charge policy would result in a "mere 1 µg/m³" overall reduction in pollution. The air quality technical note by Ricardo found both positive and negative impacts of the scheme. However, the greatest positive impacts on air quality were observed at monitoring sites DT55 and DT85 along St. Clement's Street where it was estimated that AADT decreases between 43 – 51% which results in an estimated NO2 decrease of 10.4 – 11.6 µg/m3. The greatest negative impacts on air quality are observed at monitoring sites along Woodstock Road (DT83, TF6) and along the south-east section of the A4142 Oxford ring road (TF30, TF31). It is estimated that AADT increases by 9 – 17 %, and results in an NO2 increase of 1.2 – 1.5 µg/m3. The monitoring sites at these locations are not at risk of exceeding annual mean NO2 limit values under the DS-RUC1 scenario, however site TF31 remains above the Oxford local target of 30 µg/m3, albeit where there are fewer active travel and residential receptors in close proximity, unlike areas such as St. Clement's Street (which is narrower, less open with building footprints directly fronting the highway).

65. It is correct that the change in congested vehicle speed along modelled road links were not considered in the study, however we consider that the approach taken in the technical note is a reasonable approximation of the change in road NOx that is directly proportional to the change in AADT along modelled road links and a good indicator of where levels will increase or decrease.

66. If Open Roads for Oxford and Reconnecting Oxford are serious about air quality in Oxford, they should support measures that, on the whole, reduces traffic.

Improve the health and wellbeing of our communities

67. See preceding paragraphs. However, where there are shops and local schools on the Woodstock Road, we expect traffic to reduce. We would like to work with all trip generators in the area, including schools to help reduce congestion. This could include, but not limited to, providing a drop off point at the P&Rs for private schools and improving the conditions for pedestrians and cyclists as outlined above.

68. It is agreed that congestion is a cause of stress. Pretending that congestion is not a problem today will not solve the problem. The county council has had proposals and plans since 2015 to solve Oxford's chronic congestion problems. The best thing for the health and well-being of the population, including stress, is being more active, where possible. Successive chief medical officers have stated this unequivocally. However, the health and well-being of the nation is getting worse. Commuting by active travel means is one of the best ways to build activity into everyday life. By providing the safe and lower traffic streets, this will help not only congestion but also the NHS.

69. If Open Roads for Oxford and Reconnecting Oxford are serious about health and well-being in Oxford, it should support measures that, on the whole, reduces traffic.

Inequality in outcomes

70. On average, traffic will be reduced by between 15% and 20% within the central area of the city and between 2% and 5% in the outer areas. Therefore, on average people will benefit from less traffic and improved air quality. This is only illogical if one misrepresents the data.

71. Disabled and blue badge holders can apply for permits. Given the expected level of traffic reduction, this will make driving in the city for these groups easier. Disabled people also use public transport, walk and cycle. Improving conditions for these user groups will also improve it for other protected groups. Given 30% of people in Oxford do not have access to a car, these alternatives modes are a lifeline for work, education and services. There has to be limit on the number of vehicles associated with a blue badge at any one time to prevent abuse of the system. The back-office system will be set-up to make accessing account information as easy as possible, but we certainly welcome any feedback for those that have additional needs.

72. As stated throughout the consultation, the temporary congestion charge has been based on the trial traffic filter scheme, utilising the same infrastructure. The assessment work associated with development of the temporary congestion charge has shown it will have similar impacts to the trial traffic filters. It is expected that the traffic reduction will be of a smaller scale. Therefore, it is wholly appropriate to base the Equalities Impact Assessment on the trial traffic filters but update with new information.

73. If Open Roads for Oxford and Reconnecting Oxford are serious about inequalities, given the 20 different exemptions and permits associated with the scheme that will assist those with protected characteristics travel around the city, by whatever mode, including disabled and blue badge holders, they should support measures that, on the whole, reduces traffic.

Questionable justification for the scheme

74. The justification for the scheme is to improve bus journey time reliability and improve conditions for walking and cycling. Congestion will still exist in some locations where traffic flows have reduced. Whilst in some locations traffic flows have been reducing in the city, congestion has persisted as a major problem affecting how people get around. Vehicles have been getting larger. The average size of vehicles on the road has increased significantly since 2011. SUVs now account for 28.6% of all new car registrations, up from just 11% in 2013. Over half of new cars sold in 2023 were too wide for standard on-street parking spaces. Wider vehicles encroach on footpaths, reduce space for cyclists, and increase congestion. The height and mass of SUVs raise safety concerns: a

10 cm increase in vehicle front height correlates with a 30% higher fatality risk in pedestrian and cyclist collisions. SUVs are disproportionately involved in fatal crashes with pedestrians and cyclists. Studies show children are 8 times more likely to die when struck by an SUV compared to a regular car.

75. Since 2020, the way we do business has rapidly changed, hastening a trend started before 2020 of increased internet shopping, home and food delivery. The UK has seen a 13% increase in Light Goods Vehicles (LGVs) and a 3% growth in HGVs over recent years, and this growth is having a notable impact on traffic. Additionally, mopeds and e-bikes have risen exponentially due to the rise in food delivery companies.

76. Regardless of the reasons for congestion, we know buses are getting slower and more unreliable. Many people are still not willing to walk and cycle because roads are too busy. Traffic levels still need to be reduced and that sometimes needs a different course of action rather than trying to provide ever more capacity for traffic.

The real drivers behind the scheme?

77. The traffic filters, zero emission zone and workplace parking levy have been ADOPTED county council policy since 2015. This was a long time before ZEBRA was introduced as a funding stream. Given the lack of intervention for a number of years, the bus operators would only invest in zero emission buses if the county council implemented its policy adopted seven years previously. Policy is designed to be implemented to achieve the the stated policy aims.

78. On 19 July 2024, it was not known how long Network Rail would take to complete its work on Botley Road. It was only known it would not open in October 2024. It could have opened in January 2025 – in which case, an interim scheme would not have been necessary. The August 2026 date only became apparent in January 2025. Officers then began to look at interim solutions. The bus operators, and crucially, the city council do agree with the position that congestion is at a level where something needs to be done now. The city council stated:

79. “Oxfordshire County Council, as the highways authority, must take action now to tackle congestion and speed up bus journeys in Oxford. We cannot leave residents wasting hours every day sitting in traffic jams for another year and a half”.

80. In a video on social media, the Leader of the city council, Cllr Susan Brown, stated that “everything should be on the table”.

81. The bus operators have also publicly expressed their concern with bus services worsening since the Botley Road closed with journey times increasing on the Abingdon Road by 17% and the number 14 service (Banbury Road / Marston

Ferry Road) by a similar amount. Neither of these service delays can be attributed to an LTN.

82. Reconnecting Oxford claims ‘we believe the council is actively embracing the “sunk cost fallacy”’ due to money spent on the traffic filters. It is unclear where the “sunk costs” are given that the county council has been very clear it still wants to implement the trial traffic filters. Therefore, the funding ‘sunk’ to date will be used for exactly the intended purpose.

83. Equally, Reconnecting Oxford claim that ‘... it should also be recognised that – apart from the addition of the St Clements filter – the congestion charge now being proposed is essentially the same as originally consulted on in September 2019” (para 28, p.11) is simply not true. Reconnecting Oxford concede in para 23 that ‘Two years later, in September 2022, a consultation was launched regarding the traffic filter scheme. The scheme was less draconian than the original Connecting Oxford Scheme [traffic filters], due to the existence of car permits and van and lorry exemptions’. Even though this underplays the number of changes made to the scheme in response to various consultations, including delivering the different Connecting Oxford schemes in phases, hence the name change, Reconnecting Oxford would appear to be inconsistent on this point.

84. Reconnecting Oxford seems to be confused as to whether a road is congested or not. In paragraphs 54 and 55, it is claimed that St Clement’s Street is not congested and “there is often little traffic on St Clement’s”, but then in paragraphs 56 and 57 concede it is congested and the reasons for this. It cannot be both. Equally, in Chapter 2 of Reconnecting Oxford’s response, it states ‘Some of the winners (Iffley Road, St Clements) are residential areas...’ suggesting that there is an issue and the proposal will solve the problem on St Clement’s Street. Furthermore, in chapter 3 at para 41, Reconnecting Oxford state ‘Given that the Plain is a cycling accident hotspot, we believe that anything that has the dual benefit of freeing up capacity on the Plain roundabout to ease congestion, while also making cycling safer, should be embraced with gusto.” Given The Plain is the pinch point, and creates congestion on St Clement’s Street, Cowley Road and Iffley Road, we absolutely agree that congestion at The Plain is a severe issue and this should be a priority and hence the congestion charge location on St Clement’s Street. We also absolutely agree that pedestrian and cycling safety should be of paramount importance. We do not dismiss the idea put forward by Reconnecting Oxford of segregated cycle lanes from Iffley Road to Magdalen Bridge. However, a cluster of accidents occur from Magdalen Bridge / St Clement’s Street to Iffley Road. The junction needs to be looked at holistically but first we need to reduce the level of traffic. We welcome Reconnecting Oxford’s support for this.

85. It is appreciated that areas of highways legislation can be complicated and difficult to understand. The six charging points can be implemented with the Botley Road closed but the six traffic filter points cannot. This is because the trial traffic filters would be implemented as a ‘prohibition’. This means that without an exemption or permit, a driver would be committing a moving traffic offence,

resulting in a penalty charge notice (fine), if a driver went through a traffic filter location. Prohibitions would prevent most traffic from accessing part of the city centre, including the Westgate and Ice Rink, without incurring a penalty charge notice.

86. The temporary congestion charge is a charging scheme using different legislation. This means that the area of the city centre with the Botley Road closed would be accessible by car but would need to pay a congestion charge (so not prohibited), if they do not have an exemption or permit.

87. As the trial traffic filters is to be implemented as an experiment with a maximum of 18-month duration, it would not be possible to implement the trial with only 4 or 5 out of 6 filter points in operation. That is because the filters points are designed to work together and operate city wide, within the ring road. It is evident that when the Botley Road closed – traffic diverted to Abingdon Road, Woodstock Road and Banbury Road. Therefore, monitoring of the trial would be impacted, and we would not be achieving the benefits we expect. On a limited trial basis, this would be problematic to say the least.

The naming and positioning of the scheme

88. The naming of the scheme is related to the charging order that governs it. It is a road user charging scheme using powers in the Transport Act 2000. This is the only legislation open to local highway authorities outside London. If it had been called something else other than a congestion charge, we would have been criticised for not being open and transparent about what it is. In the words of Open Roads for Oxford, this is a less “punitive” congestion charge than one might think of a traditional congestion charge, due to access to most parts of the city being possible without passing through a congestion charge point and the wide ranging of exemptions and permits. The scheme is designed to reduce traffic/congestion on key parts of the network by use of road user charging. It is, therefore, a congestion charge.

89. The current proposal is a temporary solution to mitigate the Botley Road closure and the fact the county council cannot implement the approved trial traffic filters. When the Botley Road opens, the county council will commence with the traffic filters trial. Open Roads for Oxford has misunderstood the sign position – it has nothing to do with procurement but rather sign authorisation from the Department for Transport.

90. A road toll is traditionally a charge from point A to B (such as the M6 toll). The congestion charge points are not that but rather simply points. There is no A to B because a vehicle will only be charged if it passes through the ‘point’, not a stretch of road.

91. For the avoidance of doubt, the county council did not rely on the same modelling as the trial traffic filters. A separate modelling and forecasting exercise

was undertaken in March and April 2025. This was published for the consultation.

Lack of accident risk assessment

92. A road safety audit process has been followed and will continue to be followed if the scheme is approved to proceed. If the scheme proceeds, the county council will monitor the implemented scheme carefully, including from a road safety perspective.

93. We know from data that less traffic and lower speeds reduces the risk of accidents. If Open Roads for Oxford and Reconnecting Oxford are serious about road safety, they should support measures that, on the whole, reduces traffic.

Accessibility of the scheme

94. Many people today access services through digital means. This is the same for any organisation or company offering a service. It is accepted that a small minority of people are digitally excluded and so a telephone service will be available and additional support where required.

City centre businesses - trade

95. Surveys completed in 2022 showed around 90% of city centre visitors arrive in the city centre by modes other than private car. Based on this, together with data on spend per visit and frequency of visit, it is estimated that non-car modes account for around 90% of city centre spending. The congestion charge will increase the attractiveness of the city centre for those arriving by non-car modes. Similarly, more than 90% of people surveyed in Summertown access the local shops by non-car modes. However, those who do want to drive to the city centre can do so without incurring a charge by using an Oxford or Oxfordshire day pass. Most of Oxford, including all local centres, will be accessible without travelling through a congestion charge point. Those with exemptions and permits will be able to drive in a lower traffic environment, again, improving access even by car. If the proposal proceeds, it is the intention to provide substantially discounted or free bus travel from the park and ride sites. Again, this will enhance access to the city centre and other destinations.

96. Given that all the evidence suggests that access will be enhanced for almost all of city centre visitors, coupled with proposals to make park and ride cheaper, it will mean that access to the city centre will be enhanced and will aid pre-Christmas shopping trade. With no daily time limits of parking at the P&R sites, this will enable shoppers and visitors to spend more time in the city without incurring significant parking charges – money that could be spent in shops instead.

97. Even if the strategy was to prioritise the private car, visitors would be stuck in congestion and there is not the car parking capacity to accommodate the demand in the city. At busy shopping times, the Westgate car park is often full, which is a cause of congestion in itself. There is plenty of capacity at the P&Rs to accommodate many more visitors. Therefore, making this more attractive with cheaper fares and quicker buses is the obvious strategy.

98. Whilst occupancy rates and footfall may not be perfect measures of the health of the high street, when compared to other areas of the country it is obviously a very good barometer. Oxford has continued to buck the trend in terms of footfall and occupancy rates, ranking towards the top of 'league tables' on both fronts.

99. Independent shops do matter, and the county council is of the view that by improving access for all, this will help Oxford's independent shops and retail in general as well as other companies that do business in the city.

100. Oxford has an incredibly good public transport network. This is recognised in that around 14.5% of journeys to work in Oxford are made by bus (excluding P&R). Since the introduction of the high Street bus gate, 44% of all person trips to Oxford city centre are made by bus. However, due to congestion, it is slow and unreliable. By making buses run to the speed limit and to timetable, it will become more attractive for new and existing users, especially considering 30% of people in Oxford do not own a car. Many residents of Oxford and Oxfordshire rely on the bus network to access employment, education, retail and services. By retaining the status quo, the county council would not be serving this specific and not inconsiderable section of society leading to ever more unreliable bus services and even service cuts, leaving them in a worse position. Additionally, the income from the congestion charge could be used to make buses cheaper by significantly discounting, or potentially making free, the bus journey element of P&R. This could essentially mean a free shuttle bus to the city centre and other key areas (subject to the charge income being sufficient).

101. However, most areas of the city will be accessible without passing a congestion charge point with the exception of part of the city centre. Given it is proposed to allow unlimited day passes for residents (including visitor permits) and commuters with a destination in the central permit zone to mitigate this impact.

102. The county council does not expect everybody to switch modes, but it is hoped that if enough people make small changes to their daily travel habits, everybody will benefit from reduced congestion.

Assessing impact

103. The county council has assessed the impact of the scheme with a business impact assessment and an equalities impact assessment. The county council is of the view that access will be improved for all.

Hospitals

104. Public transport to hospital sites has been sufficiently covered above so will not be rehearsed here.

105. The transport modelling of the scheme is described in Section 2 of the Modelling and Income Forecasting Report. The modelling takes account of journey times, distances and charges by trip purpose at different times of day (am peak, inter peak and pm peak) and also separately by car and public transport throughout Oxford, including commuting and other trips to and from hospitals. The Variable Demand Model takes account of changes in travel behaviour in response to charges, including change of route, mode (car or public transport), destination choice and time of travel.

106. Patients who visit hospital frequently can apply for free permits to access the hospitals by car.

107. Open Roads for Oxford and Reconnecting Oxford's approach is to acknowledge that traffic heading to the hospital sites is part of the problem but to do nothing about it other than to add on more bus services, without recognising the John Radcliffe is already served by no fewer than 10 bus services, with direct links from 3 P&R sites. The county council would like to implement policy which makes alternative modes more attractive by reducing traffic and congestion more widely.

Private schools

108. It is welcomed that Open Roads for Oxford and Reconnecting Oxford acknowledges that congestion is a problem in Oxford and that hospitals and private schools are part of the problem. They seem to cherry pick certain areas of the city that suit their narrative without recognising that private schools (and state schools that generate car traffic) are located across all parts of the city. The county council's approach is to look at traffic reduction regardless of the source to reduce congestion across the city, in a holistic manner. This includes continuing to work with all schools in the cityto reduce their impact on congestion.

109. The county council is currently in discussions with its partners to allow parents to drop children off at the P&R sites and allow school coaches / minibuses to access and pick up school children. This is all part of the wider transport strategy. Feedback from private schools suggests that parents are not always willing allow children to use home to school transport if the buses are caught in congestion.

110. Magdalen College School already provides comprehensive school transport for its pupils with 90% of pupils arriving by sustainable modes.

Low Traffic Neighbourhoods (LTNs)

111. It is clear that acute congestion has affected the city's road network for many years before LTNs were introduced. In 2018, the average morning rush hour inbound traffic speed in Oxford was 10.6mph.

112. Whilst LTNs therefore appear to have increased congestion in places (as noted in previous cabinet reports), it is clear that congestion existed across Oxford before LTNs. Removing LTNs might slightly reduce congestion close to the LTNs (at least temporarily), but their removal would not lead to traffic reductions in other parts of the city.

113. LTNs are part of a wider strategy to deliver the aim of reducing car trips in the county by 1 in 4 by 2030 and 1 in 3 by 2040. Tackling short car trips in urban areas will be key to reaching those goals. The LTNs were designed to be implemented as a complementary measure alongside the traffic filters. However, Network Rail's continued and lengthy closure of the Botley Road has meant a delay to the trial traffic filters. The traffic reduction expected as a result of the trial traffic filters means that it does not have to be choice of different strategies. It is possible to prioritise walking, cycling and bus travel whilst also providing residents with quiet and low traffic streets, to enable them to make sustainable travel choices.

114. Using narrow residential routes as "relief roads" to reduce congestion on main roads is not a practical long-term solution to congestion in Oxford. The benefits of LTNs for residents and those walking or cycling through LTN areas are significant and contribute to the wider policy objective of improving active travel infrastructure and reducing car trips in the city. Prioritising motor traffic over those walking and cycling does not accord with Oxfordshire County Council's adopted transport user (road) hierarchy in the Local Transport and Connectivity Plan (LTCP). This is what sets the direction for the whole LTCP and clearly outlines the order in which we will consider different modes of transport in scheme design.

115. The evidence from LTNs is that people are adapting car journeys or using their cars less and walking and cycling more for short journeys, even by those opposed to LTNs (Understanding Mobility and Activity in the Low Traffic Neighbourhood)

116. Oxford has many long-standing residential 'no through roads' which, if opened to all traffic, might temporarily relieve congestion on major routes. There appears to be no good reason to adopt a "last in, first out" approach, so unless all residential no through roads that might relieve congested major roads were opened, it would be difficult to determine on what basis to open some and leave others closed. Given the inappropriate nature of residential streets for large volumes of traffic and the impact on quality of life, many new developments are now designed on a cul-de-sac basis without through routes for motor vehicles. Primary or boundary roads are used for through roads and the main access routes into and out of development sites.

117. The recent Citizens' Assembly did not call for the removal of LTNs. Bus operators have expressed concerns about the impact of LTNs on bus reliability, but recognise the role of LTNs in boosting sustainable transport in the city alongside other measures (such as the traffic filters).

Disregard for Alternative Solutions

118. The Independent Oxford Alliance (IOA) has suggested an alternative solution to the problem of congestion in Oxford. The IOA solution is based on the removal of Low Traffic Neighbourhoods in East Oxford and Cowley, accompanied by unspecified targeted road layout changes to tackle congestion. Traffic would be reintroduced along the affected streets between main roads but only by introducing one-way streets (although some already are, or historically have been, one-way streets). This would return heavy traffic flows into streets that since the introduction of LTNs, have become quieter, safer and more attractive routes for residents and notably for people using them as key parts of their walking and cycling journeys across the city. An additional risk of one-way traffic circulation is excessive vehicle speeds. Allowing vehicles to travel through existing LTN areas again would also reintroduce risks of turning vehicle collisions with pedestrians and cyclists at junctions with the main roads.

Locations of the congestion charging points

119. Open Roads for Oxford and Reconnecting Oxford's misunderstanding about how the scheme works has been covered in earlier sections of this response.

A different approach to bus scheduling

120. Bus scheduling is a matter for private bus operators on commercial routes.

Managing the consequences of food and other delivery services

121. It is welcomed that Open Roads for Oxford recognises the impacts of food delivery on congestion and other issues. The county council works with its partners to find solutions to what are difficult problems nationally. This must be part of the strategy for sustainable and vibrant city.

Specific solutions to improve access to hospitals

122. The county council is already exploring ways to improve access to the JR with significant bus service enhancement over recent years (see the response under 'Hospitals and P&R''). The county council is working with the hospital trust to improve cycle parking on site and a potential bus lane on trust land. The P&R sites are already connected with direct and minimal stop services. The problem is they are caught in too much congestion which slows them down and makes them unattractive. Officers are also looking at the engineering viability of accessing the JR site via Barton Fields Road and A40 junction. However, it is

unclear what the viability of the bus service is likely to be. This is all part of the wider transport strategy.

123. If Open Roads for Oxford and Reconnecting Oxford are serious about improving access to the hospitals, they should support measures that, on the whole, reduces traffic.

Specific solutions to reduce the impact of private schools' start and end times

124. See section under 'Private schools'.

More challenging but potentially effective solutions

125. The county council is aware of tidal flow bus lanes. However, for an interim solution, this could not be implemented in time. For the trial traffic filters, it is hoped that with enough traffic reduction, some bus lanes may be redundant. Road space could be reallocated from bus lanes to fully segregated cycle lanes. The example of Woodstock Road is noted previously in this paper. Tidal flow bus lanes would not allow for that reallocation of road space – pedestrian and cyclists are at the top of the road hierarchy.

Data and Modelling Concerns

126. Transport modelling is not an exact science and there are inherent uncertainties in all modelling exercises. The transport modelling of the scheme is described in Section 2 of the Modelling and Income Forecasting Report. The modelling takes account of journey times, distances and charges by trip purpose at different times of day (am peak, inter peak and pm peak) and also separately by car and public transport throughout Oxford, including commuting and other trips to and from hospitals. The Oxfordshire Strategic Model (OSM) includes a Variable Demand Model (VDM) which forecasts how people are likely to change their travel behaviour in response to changes in cost and time. This includes mode shift (e.g., car to bus), but also changes to destination, time of travel, or trip frequency. It models the aggregated response of travellers based on established modelling parameters.

127. The VDM used in the OSM is the standard DfT-compliant methodology for forecasting behavioural response. It uses generalised cost parameters to model how financial penalties influence travel choices. While it does not explicitly model "loss aversion" as a specific psychological concept, its parameters are calibrated to reflect observed travel behaviour in response to cost changes, which is the standard industry approach for such assessments.

128. The modelling approach explicitly accounts for behavioural responses to the charge. A 'per crossing' charge was applied as a proxy for the daily charge. This inherently models the choices drivers would make when presented with new costs, a process often facilitated by mapping apps. Furthermore, the model explicitly incorporates the effect of resident permits, allowing a certain proportion

of resident trips to pass through the filters without charge, based on the number of day passes available. The overall reduction in car demand shown in Table 3-2 is the net result after accounting for these exemptions and behavioural changes.

129. The 2025 Do-Minimum scenario, which serves as the baseline for assessing the scheme's impact, is built upon a 2023 Present Year model before the closure of Botley Road, and includes highway schemes completed by 2025, such as the LTNs. The model, therefore, assesses the additional impact of the proposed charge scheme against this existing baseline. However, the temporary congestion charge has been modelled with the Botley Road closed.

130. The transport model is based on overall travel demand data, which inherently includes all trip purposes, including journeys made by patients and visitors, even if not explicitly segmented in this specific report. The demand matrices are based on data that captures all movements, not just commuter traffic.

131. OSM is a network-wide model that inherently captures the interconnectedness of the transport system. When the scheme is modelled, the highway assignment predicts how travellers will reroute, change destination, or change mode/time of day. This means that impacts, such as traffic being displaced from one area to another, are a core output of the model. The flow change maps provide a visualisation of these network-wide effects.

132. The transport model is a strategic model and is only expected to provide an overall impact of the proposals. The modelling is, therefore, not intended to exactly predict the future but only intended to provide a guide on what could happen in terms of behaviour change (the positives and the negatives). This will be part of a suite of documents available for cabinet to make a decision. It is, therefore, deemed proportionate to inform decision making.