

Annex 19 - Key concerns and objections raised in comments

In free text fields of the survey, the key objections and concerns raised were:

a. **Effectiveness of the scheme:** Responses showed scepticism about whether the congestion charge will effectively reduce traffic congestion. This was either alongside concern about redistributing traffic, or the number of permit types available.

Officer Response

The modelling and income forecasting report that accompanied the consultation proposals sets out the impacts of the temporary congestion charge. It was undertaken using industry standard modelling. Whilst all transport modelling is subject to uncertainties our transport model is designed to assess the broad impacts of transport interventions. The model used for the assessment of the scheme impacts was developed in line with Department for Transport (DfT) Transport Appraisal Guidance (TAG).

Forecasts (whether increases or decreases) for specific roads should be approached with caution. The scheme is forecast to:

- Decrease city centre traffic by 15-20% on average
- Decrease “outer city” traffic by 2-5% on average
- Increase traffic on some outer city roads and parts of the ring road
- Decrease total mileage in the city (including the ring road) by 1%

The modelling incorporates the predicted effects of the proposed permits allowing people to drive through congestion charge locations for free.

Officers believe that the predicted impacts would deliver the kind of positive outcomes that are needed to tackle congestion and help buses to become quicker and more reliable and walking and cycling safer and more attractive.

Naturally, if the scheme is approved, its actual impacts will be monitored very carefully.

b. **Public transport:** Responses talked about bus and train services being insufficient for their needs. Either too expensive, infrequent or not serving required routes. Particularly for families, people with mobility problems, rural residents and those preferring a radial route around the city.

Officer Response

Whilst Oxford is already very well served by bus routes, the ongoing severe impact of congestion across the city has a negative effect and often makes routes slow and unreliable. This is why people living in and outside of the city regularly reject using buses as a way of getting around. As a result, more people feel they need to use a car to travel to and around Oxford and this in

turn worsens congestion and the conditions that buses operate in. The only realistic way of making buses a more attractive option is by reducing overall levels of traffic and the associated congestion.

Less traffic will enable buses to be quicker and more reliable and this improvement in bus operation efficiency should lead to the reinvestment of existing resource i.e. buses and bus drivers into better existing and/or new services in the city. This includes radial bus services (going around the city rather than simply in and out of the city centre) and Park & Ride services that benefit people living in rural areas with sparse bus service coverage will also be improved if traffic is reduced in Oxford.

If approved, the scheme will raise revenue and the county council is committed to investing that in non-car alternatives such as buses including Park & Ride to improve access to and around the city, particularly for those who can't drive or choose not to.

In addition to the improvements funded by the council through the investment plan above, bus operators propose to introduce a number of service improvements, without financial support from the council, if the scheme proceeds. 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 existing and add in new routes. Whilst this information is commercially sensitive at present, the bus operators have confirmed the principle and are actively looking at which routes could be improved if the congestion charge is implemented. We expect this to benefit a range of city bus services and enhancing the network significantly.

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.

c. **Local businesses:** Responses expressed concern that journeys would be more difficult, people would be deterred from visiting the city and businesses and other organisations would struggle with a loss of customers and difficulty recruiting staff and delivering services.

Officer Response

The proposals are expected to reduce traffic across the city overall, tackling the ongoing chronic congestion that makes daily movement slow and unreliable for all. For the many businesses situated in the city centre that rely on non-car

modes for staff and customers to reach them (more than 90% of city centre visitors do not arrive by car), the proposals should be particularly beneficial. Residents of Oxford and Oxfordshire will be eligible to apply for permits that give day passes to travel through the charging points for free during operating hours on 100 days and 25 days a year respectively.

Publicity campaigns will be implemented if the proposals are approved to make sure people are aware of how to apply for resident's permits and the many other permits that will be available to allow people to drive through charging points for free.

Mobile traders and delivery vehicles will benefit from the reduced congestion given that vans are exempt and sole traders can apply to use their cars as goods vehicle to drive for free through the charge points when carrying goods and equipment.

Overall the impacts of the scheme are expected to be positive i.e. similar to the traffic filters. There is more detail in the Business Impact Assessment (in Annex 12).

d. **Fairness:** Responses expressed concern that the charges would more negatively impact those with lower incomes who would find it harder to pay, or those with mobility problems, key workers who can't work at home, working families with children at school or nursery, older people, and some parts of the city more than others.

Officer Response

The vast majority of the city would be accessible by car without passing a congestion charging point if the proposals are approved. But officers expect non car alternatives for journeys through proposed congestion charging points will be significantly improved so driving doesn't need to be the default or only option.

Chronic congestion in Oxford negatively affects journeys by residents, businesses and service providers. This includes people living in deprived areas of the city and those who don't have access to a car who depend on alternative modes of transport that are negatively affected by the city's congestion. As such these people have limited access to jobs, healthcare, leisure facilities and other services. And those providing them with support are also impacted negatively due to delays and inefficiencies in moving around. Some people feel they need to own a car because other options for travelling around the city are inadequate. Lower income households can easily spend a disproportionate amount of their disposable income on running a car.

The temporary congestion charge is expected to make bus services, walking and cycling more attractive as alternatives to the car. This should mean that people on lower incomes and without access to a car (30% of Oxford households don't have access to a car) have a greater choice of employment, better access to healthcare and other important services. And some will be

able to choose to not own a car, freeing up valuable income to spend on day to day necessities.

The scheme will raise significant amounts of revenue whilst it is operational ahead of the start of the traffic filter trial and the county council is committed to investing that in non-car alternatives such as buses including Park & Ride to improve access to and around the city, particularly for those who can't drive or choose not to.

e. **Financial impact:** Respondents highlighted the additional cost burden the congestion charge could add for them, especially those who need to drive frequently because they don't have an alternative. In some cases respondents said they would no longer be able to take part in activities or work in the city because of the added cost.

Officer Response

On the basis of the expected improvements to the operation of the bus network and better conditions for pedestrians and cyclists thanks to reduced traffic and congestion, there will in many cases be no need to drive through a congestion charging point during the hours of operation. In any case Oxford and rest of Oxfordshire residents would be able to apply for a permit that gives free travel through the congestion charge points on up to 100 and 25 days each year respectively. There are also a large number of permits that people can apply for to drive through the charging points for free including e.g. community health or care workers, unpaid carers, frequent hospital patients, Blue Badge holders, special needs school pupils etc.

Reducing congestion levels across the city overall should mean that accessibility is improved and better options are available for a wide range of activities including work, leisure and healthcare.

Officer responses to commonly suggested scheme amendments

In addition to themes outlined above, a number of amendments to the scheme were suggested by those responding to the consultation. These are outlined below, along with officer responses.

Suggestion	Officer response
Making the payment system more lenient/simple, e.g. allowing longer to pay and ensuring an offline payment option	<p>The payment deadline has been chosen to make it simple to communicate via scheme signage. The same deadline is used for Dart Charge, Mersey Gateway, Silver Jubilee Bridge, Mersey Tunnels and Tyne Tunnels. The Durham congestion charge has a deadline of 24 hours.</p> <p>The payment system will be made as simple and convenient as possible and there will be an</p>

	option to pay by phone for those without internet access.
<p>Adjusting hours of operation</p> <ul style="list-style-type: none"> • Finishing at 6pm instead of 7pm • No charge on Sundays • Operating only in am and pm peak 	<p>The temporary congestion charge is an interim arrangement pending the delayed traffic filters trial approved in November 2022. The congestion charge has been aligned as much as possible with the traffic filters scheme, to ensure as smooth a transition as possible from one scheme to the next.</p> <p>The two outer filters/charging points will only operate at peak times Monday to Saturday (although for the traffic filters this will be kept under review and the hours extended if necessary)</p> <p>For the four central filters/charging points, the proposed timings cover the most congested hours (7am to 7pm) across the course of the week. The “peak” varies by day (for example, it starts earlier on a Friday and is around midday on Saturday and Sunday).</p> <p>Peak-time only charging points or filters in the central area would likely lead to some drivers changing their time of travel, leading to increased traffic flows and congestion during the “interpeak” period in the middle of the day.</p> <p>The traffic filters are designed to allow reallocation of road space in future, if made permanent, and for this to be achievable without creating congestion the “interpeak” period, traffic reduction is needed throughout the day.</p> <p>Unlike other schemes, the congestion charge and traffic filters include a wide range of permits – including day passes for residents – allowing permit holders to make journeys at any time of day. Unlike other zone-based schemes, nearly all parts of Oxford would be accessible without passing a congestion charging point (and all parts of Oxford will be accessible without passing a traffic filter).</p> <p>Reducing the hours of operation would reduce the revenue generated by the scheme, providing less funding for complementary transport improvements such as cheaper park and ride.</p>

<p>Removing some charge locations from the scheme, commonly Marston Ferry Road, Hollow Way and Thames Street</p>	<p>Like the trial traffic filters, the congestion charge locations are designed to operate together, as a system. Removing some of the charge locations would lead to increased traffic at those locations (even compared to the current levels), meaning the scheme's benefits would not be achieved at those locations and the roads leading to them.</p>
<p>Providing additional permits for certain groups including</p> <ul style="list-style-type: none"> • Car sharing • Teachers and nursery staff • Parents with children at schools or nurseries in the city/ access to education • NHS workers • Ice rink users • Golf club users and those accessing 	<p>A wide range of permits is already proposed, including residents permits for Oxford and Oxfordshire residents.</p> <p>Car clubs are eligible for permits. Permits for car sharing (e.g. lift sharing) have been considered but would be unenforceable. However, lift sharing would allow people to 'pool' their day pass allowances, whilst also reducing traffic.</p> <p>All workplace parking at education settings will be accessible without paying the charge (either by changing route, or applying for a workplace parking users permit in the case of education settings in the central permit area).</p> <p>One of the scheme's aims is to reduce school run traffic; providing permits for childcare or education related trips would undermine this. Day passes are available and nearly all education settings in the city will be accessible to parents without passing a congestion charge location. Those in the central permit area are highly accessible by public transport; however, officers will engage with affected settings in the central permit area if the scheme is approved to establish whether any further mitigation is required.</p> <p>Community-based NHS workers will be eligible for permits. Other NHS workers would not be, but all NHS sites in the city would be accessible without passing a congestion charge location (or traffic filter).</p> <p>A new permit for regular ice rink users taking part in training or clubs is proposed in response to consultation feedback.</p> <p>All golf clubs and health and leisure services in the city will be accessible without passing a</p>

<p>health services and leisure</p> <ul style="list-style-type: none"> Working people with no alternative option but car travel, e.g. from rural areas or other reason for essential car use Electric cars Students on moving days 	<p>charging point. Residents permits are also proposed.</p> <p>Park and ride may be an option for some working people travelling from rural areas. All workplace parking in the city will be accessible without paying the charge (either by changing route, or applying for a workplace parking users permit in the case of workplaces in the central permit area). Various permits are available for essential car users.</p> <p>Electric cars contribute as much to congestion as other cars; this is a congestion-reducing scheme so there is no justification to exempt electric cars.</p> <p>Nearly all colleges and halls of residence in the city (except those in the central permit area) will be accessible without passing a congestion charging point. Officers will engage with colleges in the central permit area if the scheme is approved to establish whether any further mitigation is required.</p>
<p>Factory workers</p> <ul style="list-style-type: none"> Self-employed health and care workers Residents living close to a congestion charge point 	<p>All manufacturing businesses in the city would be accessible without passing a congestion charging location.</p> <p>Self-employed community-based health or care workers meeting the same eligibility criteria as employed workers would be eligible for a permit.</p> <p>100 day passes are offered to Oxford residents (versus 25 for the rest of Oxfordshire) because they live close to the congestion charge locations. Other permit types are also available. Apart from the central permit area, residents will be able to access all destinations by car without passing a congestion charging point.</p>
<p>Providing fewer exemptions and permits</p>	<p>The exemptions and permits proposed have been devised following numerous consultations over the course of the last six years. Officers consider they strike an appropriate balance between traffic reduction and maintaining vehicular access.</p>

