



Oxford Temporary Congestion Charge for Cars

Response to Oxfordshire County Council Consultation from Oxford Business Action Group

Contact: info@oxfordbusinessactiongroup.co.uk

Executive Summary

Oxford Business Action Group (OBAG), representing a broad coalition of independent businesses and employers across the city, opposes Oxfordshire County Council's proposed Congestion Charge scheme in the strongest possible terms.

The overwhelming majority of Oxford's business community rejects the scheme - not out of resistance to change, but due to serious concerns about its timing, design, evidence base, severity and economic implications. Our opposition is rooted in data, lived commercial experience, and direct engagement with hundreds of affected businesses.

Our submission highlights four key concerns:

1. **Severe economic risk:** The charge is likely to reduce footfall and discretionary spending at a time when trade is already fragile. A 10% loss of trade - acknowledged by OCC as possible - could be terminal for many small businesses already struggling with rising costs and supply chain disruption.
2. **Workforce disruption:** The scheme disproportionately affects lower-paid and shift-based workers, many of whom rely on cars due to poor public transport links. This risks worsening recruitment and retention issues in healthcare, education, retail, and hospitality.
3. **Insufficient evidence and consultation:** OCC's economic impact assessments are outdated, opaque and unsupported by real-world business feedback. The Council has failed to publish clear metrics for harm, define thresholds for review, or demonstrate meaningful engagement with those most affected.
4. **Absence of safeguards:** No mitigation plan or support fund has been proposed - despite OCC acknowledging a 3-6 month period of disruption before its anticipated 'modal shift' occurs. The Council has not committed to using anticipated revenue to support vulnerable businesses during this period.



If the Council proceeds with this scheme, OBAG calls for four minimum conditions:

1. Postponement of implementation until after the 2025 Christmas trading period.
2. Clear, published thresholds for economic harm that will trigger review or withdrawal.
3. A funded mitigation and support package for affected businesses.
4. Transparent mechanisms for collecting and responding to business feedback.

This is a call for responsible, evidence-based policymaking that does not gamble with the economic future of Oxford's independent business community, but supports it.

Contents

Executive Summary.....	1
Introduction.....	2
1. Economic Impact: Trade and Viability of City Centre Businesses.....	3
District Centres: Summertown and Headington as Case Studies.....	4
Summertown.....	4
Headington.....	5
District Centres Are Interconnected – And Undifferentiated in the Council's Analysis.....	5
2. Impact on Staffing, Commuting, and Service Delivery.....	6
3. Reliability of the Council's Business Impact Assessment.....	7
4. Business Community Questions for Oxfordshire County Council.....	8
Conclusion.....	9

Introduction

Oxford Business Action Group (OBAG) represents the needs of independent businesses, employers, and professional services across Oxford and the surrounding area. Our business group representation includes the High Street and historic city centre, St Clements and Headington, East Oxford, Summertown, Botley road and Jericho. Our members include retailers, hospitality providers, service trades, and other enterprises that contribute directly to Oxford's economy and civic life.

We oppose the proposed Congestion Charge scheme in the strongest possible terms, both in principle and in practice. The overwhelming majority of Oxford's independent businesses do not support this measure. The only exceptions we have encountered are organisations such as cycle couriers and licensed taxi operators with contracts or concessions from OCC itself.



This document presents OBAG's detailed response to the proposal, with specific focus on the likely impacts on trade, workforce access, business resilience, and the reliability of the Council's evidence base. Our analysis draws on first-hand experience, public and private stakeholder feedback, and cumulative engagement with OCC over the last three years.

1. Economic Impact: Trade and Viability of City Centre Businesses

Oxfordshire County Council (OCC)'s 'business impacts technical note' presents a brief, high-level commentary based on a 2022 impact assessment. The document does not address current economic conditions or stakeholder concerns. Despite acknowledging that major car parks (e.g. Westgate, Worcester Street) and areas of high commercial activity will be newly subject to charges, OCC concludes there will be no material change in impact. This conclusion lacks substantive evidence and disregards the commercial realities of 2025.

The charge directly affects customers intending to drive into the city centre for shopping or leisure. The cost, imposed on top of already high parking charges, creates a financial disincentive to visit Oxford over alternative destinations. Given rising living costs, this is expected to reduce leisure trips and discretionary spending. Retailers and hospitality providers have voiced these concerns repeatedly to both councillors and council officers.

OCC frequently cites the figure that 90% of visitors to the city centre do not arrive by car, implying only 10% of trade is at risk. This is a flawed assumption. Non-driving visitors - including students, group tourists, and some commuters - often spend little. In contrast, those who choose to drive tend to do so for convenience when transporting goods or making significant purchases. These customers contribute disproportionately to turnover.

The Council has provided no robust data in this regard. Its reliance on Mastercard transaction data excludes cash payments, debit card usage, and other credit providers, offering only a partial view of actual economic activity. It also lacks critical context: the purpose of each visit, the location and value of transactions, and the mode of transport used by each customer. Businesses find this methodology fundamentally inadequate for sound policy design - particularly when that policy threatens to damage the commercial ecosystem of the city.

Even if the Council's assumption is correct and only 10% of trade is affected, the consequences would still be severe. Many independent businesses cannot withstand such a loss - particularly in the context of ongoing pressures including the cost-of-living crisis, supply chain instability, and rising operational costs. The Council does not appear to have asked the business community, in good faith, whether such an impact would be survivable - or how it might offer support during the disruption. Officers and councillors have acknowledged that this 'adjustment period' could last three to six months. In today's trading climate, that may prove terminal for some.

If the Council genuinely believes the scheme will ultimately deliver a more vibrant and sustainable commercial environment, then it must also accept responsibility for helping businesses survive the



transition. Revenue generated during the early phase of the scheme should, at the very least, be partially ring-fenced to support the businesses most at risk. This would demonstrate not only economic stewardship but a basic duty of care towards Oxford's independent business community.

Oxford's retail vacancy rate is already at a 15-year high (Oxford Mail, 26 July 2025). A further decline in footfall or spending - especially during the vital final quarter - could tip vulnerable businesses into insolvency. The Council's stated implementation date of November 2025 heightens this risk. Business groups have consistently requested a deferral until the new year, yet these calls have been ignored. To proceed without meaningful consultation or contingency planning is not only negligent; it is irresponsible.

Business closures not only weaken the local economy but also diminish Oxford's appeal to residents and visitors alike. Vacant units are often repurposed for non-retail use or left empty - particularly where landlords are colleges with institutional priorities. This is already happening: on the High Street, at least three retail units have been converted into college office space. In the current commercial climate, with high costs, low margins, and fragile consumer confidence, few are willing to take the risk of launching a new independent venture. That is precisely why the businesses we already have - many of them long-standing, characterful, and deeply embedded in the city's fabric - must be protected.

District Centres: Summertown and Headington as Case Studies

The Council's impact assessments have treated district centres as a uniform category, despite clear differences in their business composition, customer base, and transport accessibility. For example Summertown and Headington both function as vital commercial and social hubs not only for local residents, but for car-borne visitors from across the county - and crucially, warrant separate consideration.

Summertown

Summertown has demonstrable regional reach. A car park usage survey by the Summertown and St Margaret's Neighbourhood Forum found that visitors to the Diamond Place car park travelled an average of 17.3 miles on a weekday and 24 miles on a Saturday. These distances suggest that many visitors are coming from outside the city, often from rural or semi-rural parts of Oxfordshire. In such areas, public transport is typically infrequent, indirect, or entirely absent - particularly at weekends or outside peak hours. These are not distances that lend themselves to the modal shift the Council hopes will be achieved by this scheme. Cycling such distances is unrealistic for most people, especially when transporting shopping, children or work equipment. Meanwhile, public transport options are often unviable due to poor service coverage, long journey times involving multiple changes, or prohibitively high costs for families or group travel. For a significant proportion of Summertown's customer base, the private car is not a lifestyle choice but a functional necessity. The idea that these trips can or will be replaced by walking, cycling, or buses is not supported by local transport reality.



While Summertown will not be directly subject to the congestion charge, it will be indirectly constrained by rising congestion on the ring road and new ANPR restrictions on Marston Ferry Road, a key access route from Marston, Northway, and Headington. Access to and from the city centre is also impeded by the St Cross Road camera point, which restricts northbound car journeys toward Summertown via Parks Road and South Parks Road. This poses a barrier not only for professionals travelling between client sites, but also for older or less mobile residents making necessary regular car journeys for errands, appointments, shopping and social visits.

Compounding the problem is a separate Council suggestion to remove on-street parking bays from outside Summertown shops. The combination of reduced access and reduced parking provision has prompted formal objection from local businesses, who rightly fear a double hit to trade and viability.

Headington

Headington, while excluded from the congestion charge zone, is also at risk from the scheme's ripple effects. It is home to one of the largest employment clusters in Oxfordshire, including the John Radcliffe, Churchill and Nuffield Orthopaedic hospitals. Despite its chronic traffic issues and high levels of car dependency among NHS workers, Headington is not targeted for traffic reduction under the scheme - raising questions about the strategic coherence of the plan.

Moreover, should residents from Marston and Northway divert their shopping and leisure trips from Summertown to Headington due to ANPR checkpoint avoidance, the result may be a rise in vehicle traffic along Headley Way and London Road. This would displace, rather than reduce, congestion and emissions - precisely the outcome the scheme purports to prevent.

The Council's Business Impacts Technical Note assigns a single score to all of Oxford's district centres. This approach ignores the critical fact that places like Summertown, Headington, Cowley Road, Botley Road and Marston are not interchangeable. Each has its own customer profile, business mix and access challenges. Applying a one-size-fits-all analysis erases those differences and risks flawed conclusions.

Both case studies point to the need for location-specific monitoring, economic baselining, and responsive mitigation. We therefore support the call in the Reconnecting Oxford dossier for postcode-level tracking (e.g. OX2 7 for Summertown, OX3 9 for Headington) and repeat our recommendation for published economic thresholds that will trigger pause, review, or withdrawal of the scheme, should measurable harm occur.

District Centres Are Interconnected – And Undifferentiated in the Council's Analysis

The Council's decision to collapse all of Oxford's district centres into a single category within its Business Impacts Technical Note makes it impossible to determine how – or even whether – the unique characteristics, vulnerabilities, and interdependencies of each area have been considered. By presenting them as a homogenous group, with a single score applied across the board, the Council has



obscured vital distinctions in customer base, transport links, business mix, and proximity to congestion charge boundaries or camera points.

Areas like Jericho and Summertown, or East Oxford and Headington, are not isolated from one another. They are economically and practically interconnected: residents and workers routinely travel between them for groceries, services, or social visits, while professionals operate across multiple districts as part of their daily routes. Changes in access to one area will inevitably affect its neighbours - whether through displacement, disruption, or diversion of footfall and spend.

The absence of any disaggregated assessment – let alone planned monitoring – means that businesses and communities have no way to scrutinise what has been assumed, measured, or anticipated. Without baseline data or district-level tracking, neither the Council nor those affected can detect harm as it emerges, much less act to mitigate it. This lack of transparency is not merely frustrating – it is a fundamental governance flaw that risks causing and concealing avoidable economic damage.

2. Impact on Staffing, Commuting, and Service Delivery

Many Oxford workers commute by car out of necessity. This includes NHS staff at multiple hospitals, teachers, early-years providers, retail and hospitality workers, cleaners, and tradespeople. For these individuals, public transport is often unavailable, unreliable, or incompatible with their work schedules.

Rural and semi-rural bus services are infrequent, especially outside peak hours - if they exist at all. Multi-leg journeys involving buses and trains are unworkable for many shift workers. Those affected by this scheme if it goes ahead will face a stark choice: pay the charge daily or endure longer, costlier, more stressful - and polluting - commutes.

The Council has already been warned of existing recruitment and retention issues linked to transport constraints. During the Cabinet meeting on 17 October 2023, Magdalen College School reported rising staff recruitment difficulties following the East Oxford LTN trial. Other employers echoed similar concerns. Nevertheless, the Council approved permanent LTN implementation. This despite the Oxford Bus Company's managing director Luke Marion himself acknowledging that the LTNs in East Oxford have "slowed bus journey times" and created "traffic jams during peak hours that previously did not exist."

The Congestion Charge will worsen these problems. Many workers lease vehicles and are contractually obliged to continue payments regardless of use. Paying for the charge on top of their lease is unaffordable, but abandoning their car also requires paying separately for public transport. Either way, they lose.

The scheme assumes modal shift is a matter of choice rather than constraint. This reflects a misunderstanding of real-world commuting conditions. Behavioural psychology also suggests people tend to avoid losses more strongly than they pursue gains. This loss aversion makes it likely that many will continue to drive, despite the cost. OCC appears not to have modelled this.



OCC has provided no evidence of meaningful, structured consultation with affected workforce groups. The Economic Impact Assessment and Equalities Impact Assessment also do not appear to account for the needs of lower-income and rural county workers.

Reduced workforce availability compromises service delivery. For businesses, this affects operating hours and reliability. For public services, it risks deeper disruption.

The Congestion Charge adds to a growing list of interventions (e.g. LTNs, ZEZ, parking charge increases, reduced on-street parking provision) that cumulatively burden workers and employers without providing compensating support.

OBAG notes that personal vehicles used to transport stock are exempt under the proposed scheme. However, no equivalent exemption appears to exist for businesses using personal vehicles to transport essential tools or equipment. This distinction is arbitrary and unjustified. Service providers - such as tradespeople and mobile professionals - often rely on personal vehicles to carry tools and materials necessary for on-site work across multiple locations. The lack of exemption penalises a vital segment of Oxford's local economy and misunderstands the realities of how such businesses operate.

In addition, there are numerous professions - such as estate agents and surveyors - that may not carry physical equipment, but whose daily operations depend on frequent, time-sensitive travel between locations. These workers are classic examples of legitimate 'trip-chaining': visiting multiple sites, properties, or clients in a single day. Forcing them to absorb congestion charges on every trip is both economically and operationally unreasonable. If exemptions are to reflect functional necessity, then both groups - those transporting goods and those whose business model relies on trip frequency and flexibility - must be treated equitably under the scheme.

3. Reliability of the Council's Business Impact Assessment

OCC's Business Impacts Technical Note claims broadly neutral or positive impacts. These conclusions are unsubstantiated and methodologically opaque.

The assessment lacks published methodology, scoring rationale, or stakeholder validation. It does not incorporate business consultation outcomes. Its conclusions directly contradict feedback from local businesses.

For instance, the assertion that city centre businesses will see "slightly beneficial" impacts flies in the face of widespread concern. The only admitted adverse impact is on school and hospital staffing - yet similar vulnerabilities exist in retail, hospitality, and education support services.

District centres are treated as a homogenous group despite their differing business profiles, customer bases, and transport patterns. Applying a single score to all districts is indefensible.

This assessment dates from 2022 and has not been meaningfully updated. While Council officers have attended a small number of meetings with business groups since 2022, concerns raised have not been reflected in final reports.



Without transparency on methodology or assumptions, this document does not meet the evidentiary standards expected for a scheme with major economic consequences.

There are no published thresholds for intervention if negative outcomes materialise. Monitoring is promised, but with no clear benchmarks for action. Without defined “red lines” (e.g. specific revenue declines or job losses), monitoring is meaningless and does not reassure the business community.

4. Business Community Questions for Oxfordshire County Council

1. Has OCC conducted or commissioned any economic or behavioural analysis of the likely impact that restricting access to the Central Oxford Area by means of a congestion charge will have on visitor numbers, retail footfall, or leisure and hospitality spending in the city? If so, will OCC publish this analysis, including the assumptions and modelling used? If not, why not?
2. Can OCC provide the full dataset and analysis underpinning its claim that 90% of people entering the city centre do not do so by car, as far as possible broken down by mode of transport, purpose of visit (e.g. retail, commuting, tourism), and time of day? Can OCC also provide the data or assumptions supporting its implied position that all visitors contribute equally to local spending, regardless of mode of transport?
3. What formal consultation mechanisms and structured engagement processes has OCC undertaken with businesses, schools, healthcare providers, and other major employers within the proposed charge area? How has feedback from those groups been documented and demonstrably incorporated into the design, timing, and implementation planning of the scheme?
4. What formal, direct communication methods has OCC used to notify affected organisations - such as state and independent schools, NHS trusts, and businesses - about the consultation and its potential impacts? If OCC has relied on third-party partners rather than contacting these stakeholders directly, please provide the rationale for this approach, along with a detailed breakdown of the outreach strategy, including which groups were contacted, by what methods, and associated communication expenditure. Please also confirm whether this approach meets the minimum standards for consultation on statutory schemes.
5. What is the Council’s rationale for proposing implementation of the Congestion Charge in November 2025, directly ahead of the vital pre-Christmas trading period? Why has it chosen not to delay until the new year, as repeatedly requested by business groups, given the foreseeable risks to seasonal revenue and independent business viability?
6. What metrics will OCC use to evaluate the success or failure of the Congestion Charge scheme? Has OCC established any predefined thresholds or criteria for economic harm - such as a specific percentage decline in retail turnover, rise in commercial vacancy, or staff attrition rates - that would trigger a pause, review, or withdrawal of the scheme? If so, please publish these metrics and associated monitoring mechanisms.



7. What specific mitigations, if any, are being proposed for adversely affected businesses and workers? Has OCC committed to any form of financial support to assist businesses and workers negatively affected by the scheme? If not, why not? Given OCC's own acknowledgement of a 3–6 month 'adjustment period', will the Council commit to financially supporting businesses through this high-risk phase? If not, why not?

8. How has OCC accounted for cumulative impacts from recent and concurrent transport and planning policies? Has OCC undertaken an assessment of the cumulative impact of the Congestion Charge alongside other recent interventions (e.g. LTNs, reduced on-street parking, ZEZ)? If not, why not?

9. How does OCC intend to collect, evaluate, and respond to business feedback during the scheme's rollout and operation? What reassurances can OCC provide that input from individual businesses and sector representatives will be meaningfully considered - especially given historical concerns that business feedback has been overlooked or dismissed in prior consultations?

Conclusion

The Congestion Charge scheme is not supported by the vast majority of Oxford's business community. Its current design, timeline, and lack of safeguards present clear and unacceptable risks to city centre trade, employment, and the city's wider economic ecosystem.

If the Council insists on proceeding - despite the strongest possible opposition from the independent business sector - Oxford Business Action Group calls for the following as absolute minimum conditions:

1. Postponement of implementation until after the 2025 Christmas trading period.
2. The publication of clear, measurable thresholds for economic harm that will trigger review or withdrawal.
3. A funded mitigation plan to support businesses through the Council's own projected "adjustment period."
4. Transparent, accountable mechanisms for collecting and acting on business feedback.

This scheme risks becoming not a tool for 'modal shift', but a catalyst for economic damage and long-term loss of Oxford's commercial vitality. We oppose it in the strongest terms and urge the Council to reconsider. Should the Council proceed without meeting these minimum conditions, it risks not only economic harm to the city but a failure of duty in its consultation responsibilities - grounds which may be open to future legal scrutiny.