Divisions affected: Jericho & Osney

## DELEGATED DECISIONS BY CABINET MEMBER FOR TRANSPORT MANAGEMENT

#### **05 SEPTEMBER 2024**

## OXFORD: WESTGATE AREA BUS LINK – PROPOSED 24HR EXEMPTION FOR HACKNEY CARRIAGE & PRIVATE HIRE VEHICLES

Report by Director of Environment and Highways

#### RECOMMENDATION

#### The Cabinet Member is RECOMMENDED to:

a) Approve the removal of the existing 'Prohibition of Motor Vehicles' restriction on Hackney Carriage Vehicles (HCVs) & Licensed Private Hire Vehicles (PHVs) in & around the Westgate shopping centre in Oxford, as advertised.

#### **Executive Summary**

- 1. This report presents responses to the statutory consultation on the proposals to remove the existing 'Prohibition of Motor Vehicles' restriction on HCVs and PHVs between the hours of 7pm and 7am to allow for '24-hour' access on Norfolk Street & Speedwell Street, as shown in **Annex 1**.
- On 12 July 2018, the Cabinet Member for Environment approved the use of an Experimental Traffic Regulation Order (ETRO) to allow HCVs and PHVs to use the Westgate bus link (without pick up/drop off of passengers) between 7am-7pm. This was subsequently made permanent at the Cabinet Member Decisions meeting on 17 September 2020.
- Since then, the county council has had a number of requests to allow HCVs and PHVs to access the bus link 24 hours a day to enable quicker and more reliable journeys in and around the city centre including to access taxi ranks on New Road and Queen Street.
- 4. There have been no recorded injury accidents as a result of taxis using the bus link 7am to 7pm and any concerns about additional noise and air pollution as a result of allowing HCVs and PHVs to use the bus link 24 hours a day need to be set in the context of the introduction of 159 fully electric buses onto city bus routes in 2024. This results in a very significant reduction in air and noise pollution in the Westgate bus link. An increasing number of the HCV fleet is

- fully electric and many of the PHVs operating in the city are petrol electric hybrid vehicles which are generally quieter and less polluting when operating at low speeds.
- 5. The impact of allowing HCVs and PHVs to use the bus link 24 hours a day would be carefully monitored and amendments to the TRO to remove access by HCVs and PHVs would always be a possible course of remedial action, albeit proper process would require further consultation before doing that.

#### **Financial Implications**

6. The small amount of funding for the proposals which includes minor changes to signage and consultation fees has been/would be provided by the Central Oxfordshire operational budget.

#### **Legal Implications**

7. No legal implications have been identified in respect of the proposals, with changes to existing Traffic Regulation Orders governed by the Road Traffic Regulation Act 1984 and other associated procedural regulations. Failure to adhere to these statutory processes could result in the proposals being challenged.

#### **Equality and Inclusion Implications**

8. HCVs and PHVs play an important role in ensuring people without access to a car have efficient access to the city centre. Older people and disabled people tend to be more likely to be more reliant on taxis compared to buses to travel to and through the city centre. The impact of the proposals on people in these (and the other) protected characteristics groups are considered in the Equalities Impact Assessment of the scheme which is in **Annex 2**.

#### **Sustainability Implications**

9. Taxis are part of the public transport options within the city centre and officers consider it reasonable to allow HCV and PHV access through the bus link 24 hours a day. This is particularly given that there have been very limited problems since 1 May 2019 when they were allowed to use the bus link between 7am and 7pm. There have been no recorded injury accidents involving HCVs and PHVs in the bus link. Allowing them in the bus link 24 hours a day will help improve their operating efficiencies.

#### **Formal Consultation**

- 10. A formal consultation on the proposals was carried out between 16 May and 22 July 2024. A notice was published in the Oxford Times, and an email was sent to statutory consultees & key-stakeholders, including Thames Valley Police, the Fire & Rescue Service, Ambulance service, Bus operators, countywide transport/access & disabled peoples user groups, Oxford City Council, the local county councillor representing the Jericho & Osney division and local district councillors.
- 11. A letter was also sent directly to approximately 190 properties in the vicinity of the proposals.
- 12.180 responses were received during the course of the formal consultation, comprising of: ten objections (6%), 157 in support (87%), two partially supporting (1%), and 11 raising no-objection (6%).
- 13. The full responses are shown at **Annex 3**, and copies of the original submissions are available for inspection by county councillors.

#### Officer Response to Objections/Concerns

- 14. Thames Valley Police had no objection to the proposals.
- 15. Oxford Bus Company submitted a formal objection based on its concerns that it will not be possible to enforce drop off and pick up of passengers by HCVs and PHVs through the issuing of a penalty charge notice. It feels that as a result there could be safety and operational challenges given that bus frequencies remain high throughout the evening. The full response is shown at **Annex 4**.
- 16. It has always been the case that HCVs and PHVs have been allowed to use the bus link between 7am and 7pm on the strict basis that they do not drop off or pick up passengers the use of the bus link was so that HCVs and PHVs could avoid congestion on the parts of the city centre road network that they would otherwise have to use to make trips to and across the city centre and to access taxi ranks (in the case of HCVs).
- 17. Whilst officers appreciate that bus frequencies continue to be high through the evening, there have only been occasional reports that drop off and pick up of passengers has taken place 7am to 7pm. There have not been any recorded injury accidents on the bus link involving HCVs and PHVs since they were allowed to use it 7am to 7pm (started 1 May 2019). If approved, the 24 hour use of the bus link will be carefully monitored (see below).
- 18. The main reasons for other objections to the proposals were that allowing HCVs and PHVs to use the bus link 24 hours a day would increase traffic and

- associated noise and air pollution. Also that the additional traffic would make conditions for cyclists and pedestrians less safe.
- 19. It is clearly important for the streets around the Westgate Centre to be as attractive as possible for pedestrians and cyclists. However, allowing HCVs and PHVs to use the bus link between 7am and 7pm when flows of pedestrians and cyclists are high has not led to any injury accidents involving taxis and overall traffic volumes are still low (especially compared to other city centre streets) meaning that walking and cycling along, and crossing the bus link are very easy and comfortable things to do for the vast majority of the time.
- 20. A small number of people raised concerns about the additional noise and emissions that would be produced if HCVs and PHVs are allowed to use the bus link 7pm to 7am. Overall, the number of additional HCV and PHV movements are expected to be modest. However, the noise and air pollution from the additional HCVs and PHVs must be balanced against the very significant reduction in noise and air pollution that is a result of the introduction of 159 fully electric buses onto the city's bus network in 2024.
- 21.Many responses to the consultation mentioned the benefits of the proposals, not least ensuring that taxi operation in the city centre would become more efficient which is useful for the many people who choose or have to use this form of non-private car transport to move around. The shorter and quicker journeys will help reduce some taxi fares for people travelling to, through and around the city centre, including important destinations such as the train station. People using HCVs and PHVs include older people and those with limited mobility.
- 22. Officers therefore recommend that HCVs and PHVs are allowed to use the bus link 24 hours a day as advertised in the recent consultation. This is considered to be a reasonable outcome and do not expect it to result in safety issues or indeed any negative impacts on the efficient operation of buses on the bus link.
- 23. If the Cabinet Member accepts the officer recommendation, the new arrangements will of course be very carefully monitored. Indeed, it should be possible for the bus operators to make use of the enhanced CCTV capability of its bus fleet to alert officers to any persistent dropping off or picking up of passengers by HCVs or PHVs and any other dangerous incidents involving HCVs and PHVs. If such incidents do take place and subsequent requests directly to COLTA and the PHV community to remind their drivers about the conditions of their being allowed to use the bus link do not result in improvements, the option of amending the TRO to remove access for HCVs and PHVs is something that could be pursued. Further consultation before this could take effect would be needed.
- 24. For the avoidance of doubt, officers recommend that HCVs and PHVs are only allowed to use the Westgate bus link 24 hours a day on the basis that there will continue to be no dropping off or picking up of passengers.

#### **Paul Fermer Director of Environment and Highways**

Annexes

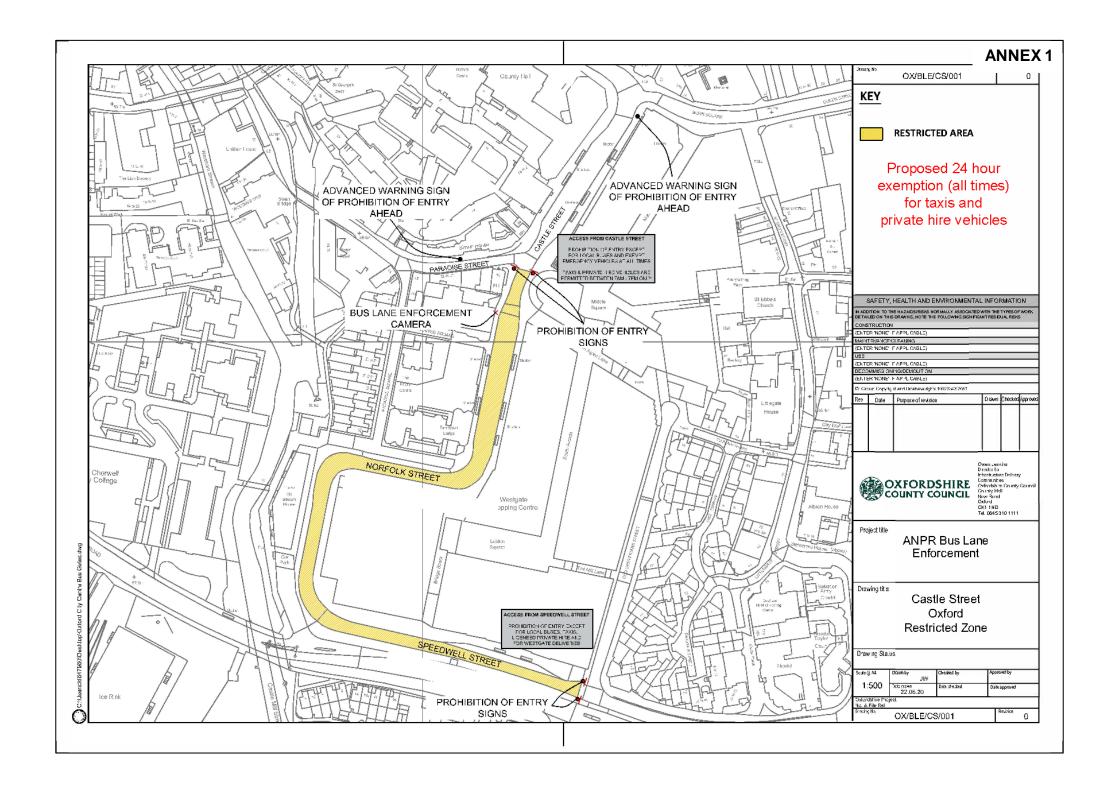
Annex 1: Consultation plan Annex 2: Equalities Impact Assessment

Annex 3: Consultation responses

Annex 4: Oxford Bus Company full response

Craig Rossington (Technical Lead - Transport Planning) Contact Officers:

September 2024





# Oxfordshire County Council Equalities Impact Assessment

Allowing Taxis and Private Hire Vehicles to use Westgate Bus Link, Oxford, 24 hours a day

August 2024

## Contents

Section 1: Summary details	9
Section 2: Detail of proposal	10
Section 3: Impact Assessment - Protected Characteristics	
Section 3: Impact Assessment - Additional Community Impacts.	
Section 3: Impact Assessment - Additional Wider Impacts	
Section 4: Review	

## Section 1: Summary details

Directorate and Service Area	Environment and Place
what is being assessed (e.g. name of policy, procedure, project, service or proposed service change).	Proposal to allow Taxis (Hackney Carriage Vehicles – HCVs) and Private Hire Vehicles (PHVs) to use the Westgate Bus Link in central Oxford (from the junction of Speedwell Street/Old Greyfriars Street to the junction of Castle Street/Paradise Street) 24 hours a day (no dropping off or picking up of passengers).
Is this a new or existing function or policy?	Currently HCVs and PHVs can only use the Westgate Bus Link between 7am and 7pm.
Briefly summarise the policy or proposed service change. Summarise possible impacts. Does the proposal bias, discriminate or unfairly disadvantage individuals or groups within the community?  (following completion of the assessment).	The proposal is not expected to have a disproportionate impact, bias, discriminate or unfairly disadvantage individuals or groups within the community.  Allowing HCVs and PHVs to use the Westgate bus link 24 hours a day will enable more efficient operation of this part of the public transport offer in the city and will therefore improve accessibility for people in the protected characteristic groups who are unable to cycle, walk or to use buses. Officers believe that these benefits will outweigh any small negative impacts of additional vehicle movements on the bus link for people walking and cycling there.
Completed By	Craig Rossington
Authorised By	Jo Fellows
Date of Assessment	20 August 2024

#### Section 2: Detail of proposal

Context	/ Background

Briefly summarise the background to the policy or proposed service change, including reasons for any changes from previous versions. In July 2018 the Cabinet Member for Environment approved an Experimental Traffic Regulation Order (ETRO) allowing Hackney Carriage Vehicles (HCVs) and Private Hire Vehicles (PHVs) to use the Westgate bus link in Oxford city centre (between Old Greyfriars Street and Paradise Street) 7am to 7pm as a through route only i.e. no passengers to be picked up or dropped off. This arrangement was subsequently made permanent.

Multiple requests have subsequently been made by representatives of the HCV trade to allow their vehicles to use the bus link 24 hours a day to help them operate more efficiently.

#### **Proposals**

Explain the detail of the proposals, including why this has been decided as the best course of action.

Allowing HCVs and PHVs to use the Westgate bus link from 7am to 7pm over the past 4 years has not led to any recorded safety issues and there have only been a small number of minor amenity concerns relating to vehicles stopping to drop off or pick up passengers (HCVs and PHVs are only meant to use the bus link as a through route).

Allowing HCVs and PHVs to use the bus link 24 hours a day will help improve the efficiency of their operation in the city centre and ensure further benefits to those people with protected characteristics who rely on this mode of transport to get around.

#### **Evidence / Intelligence**

List and explain any data, consultation outcomes, research findings, feedback from service users and stakeholders etc, that supports your proposals and can help to inform the judgements you make about potential impact on different Feedback from a statutory consultation on the proposal has been taken into account in arriving at the officer recommendation to go ahead with making access to the bus link 24 hours a day. This feedback is considered in the officer report that this EIA is an annex to.

There have been no recorded accidents involving PHVs and HCVs on the Westgate bus link since they have been allowed to use it 7am to 7pm. Any minor increase in vehicle emissions and noise as a result of HCVs and PHVs

individuals, communities or groups and our ability to deliver our climate commitments.	being allowed to use the bus link 24 hours a day will be more than mitigated by the introduction of 159 battery electric buses in the city. The vast majority of these use the Westgate bus link.
Alternatives considered /	Continuing with the time limit for HCVs and PHVs using the Westgate bus link is an option but officers do not
rejected	consider that there is good reason to do that. This is set out in the accompanying officer report.
Summarise any other approaches	
that have been considered in	
developing the policy or proposed	
service change, and the reasons why	
these were not adopted. This could	
include reasons why doing nothing is	
not an option.	

## **Section 3: Impact Assessment - Protected Characteristics**

Protected Characteristic	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (*Job Title, Organisation)	Timescale and monitoring arrangements
Age		×		Older people are more likely to need to use taxis to access the city centre if they do not have access to a private car. The benefits to older people of better travel by taxi will outweigh any possible negative impacts of additional vehicle movements on older people crossing the bus link.	N/A	N/A	N/A
Disability		×		People with mobility impairments are more likely to be reliant on taxis than buses. The benefits to disabled people using taxis will outweigh any possible negative impacts of additional vehicle movements on disabled people crossing the bus link	N/A	N/A	N/A
Gender Reassignment	×			People undergoing gender reassignment are unlikely to be disproportionately impacted by the proposals.	N/A	N/A	N/A

Marriage & Civil Partnership			People who are married or in a civil partnership are unlikely to be disproportionately impacted by the proposals.	N/A	N/A	N/A
Pregnancy & Maternity	$\boxtimes$		Pregnant people and parents with infants/young children are unlikely to be disproportionately impacted by the proposals.	N/A	N/A	N/A
Race	X		People are unlikely to be disproportionately impacted by the proposals based on their race.	N/A	N/A	N/A
Sex	X		People are unlikely to be disproportionately impacted by the proposals based on their sex.	N/A	N/A	N/A
Sexual Orientation	$\boxtimes$		People are unlikely to be disproportionately impacted by the proposals based on their sexual orientation.	N/A	N/A	N/A
Religion or Belief	×		People are unlikely to be disproportionately impacted by the proposals based on their religion or belief.	N/A	N/A	N/A

## **Section 3: Impact Assessment - Additional Community Impacts**

Additional community impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner  (*Job Title, Organisation)	Timescale and monitoring arrangements
Rural communities	$\boxtimes$			People who live in rural areas are unlikely to be disproportionately impacted by the proposals.	N/A	N/A	N/A
Armed Forces	$\boxtimes$			Armed forces are unlikely to be disproportionately impacted by the proposals.	N/A	N/A	N/A
Carers				Carers are unlikely to be disproportionately impacted by the proposals.	N/A	N/A	N/A
Areas of deprivation		$\boxtimes$		People living in areas of deprivation are more likely to not have access to a car so improving the non-car options to travel into the city centre is likely to be positive for people in this group.	N/A	N/A	N/A

### **Section 3: Impact Assessment - Additional Wider Impacts**

Additional Wider Impacts	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (*Job Title, Organisation)	Timescale and monitoring arrangements
Staff	×			Council staff are unlikely to be disproportionately impacted by the proposals.	N/A	N/A	N/A
Other Council Services	$\boxtimes$			Other council services are unlikely to be disproportionately impacted by the proposals.	N/A	N/A	N/A
Providers	×			Providers are unlikely to be disproportionately impacted by the proposals.	N/A	N/A	N/A
Social Value 1				N/A	N/A	N/A	N/A

<sup>&</sup>lt;sup>1</sup> If the Public Services (Social Value) Act 2012 applies to this proposal, please summarise here how you have considered how the contract might improve the economic, social, and environmental well-being of the relevant area

#### **Section 4: Review**

Where bias, negative impact or disadvantage is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a full er assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review Date	12 months after the making of the TRO to allow taxis to use the Westgate bus link 24 hours a day
Person Responsible for	Craig Rossington
Review	
Authorised By	Joanne Fellows

#### **ANNEX 3**

Respondent	COMMENTS
(1) Traffic Management Officer, (Thames Valley Police	No objection
(2) Head of Built Environment and Infrastructure, (Oxford Bus Company)	Object – Our objection surrounds the enforcement and enforceability of the existing and proposed Order where pick- up and set down by HCVs and PHVs in the link takes place, despite being prohibited currently.  [See full response at Annex 3]
(3) Oxford Pedestrians Association	Support – on the grounds that this move increases mobility for pedestrians and people with mobility support needs.
(4) Local Resident, (Faringdon, Beech Close)	<b>Object</b> – We should be doing all we can to encourage the use of non-car traffic around Oxford. While I appreciate that taxis need to make a living, the centre of Oxford particularly around the Westgate Centre should be restricted to pedestrians, cyclists and buses only, to encourage the use of buses and public transport. Allowing taxis would result in them setting down and picking up passengers potentially blocking bus traffic.
(5) Member Of public, (Islip, High Street)	Object – The area is already crowded, pedestrians and cyclists use it a lot. Taxis make up a lot of traffic in oxford and this change will dramatically add to traffic and make the area unsafe for kids, add to pollution etc. With buses it is just about manageable. Also incentivises bus travel because taxis take longer because of traffic.
(6) Local Resident, (Oxford, Cave Street)	Object – I regularly walk and cycle in the city centre. The quality of driving by taxis is extremely poor. Taxi drivers often close pass me on my bike, sometimes within inches. They constantly park on the pavement or in cycle lanes. They rarely give way to pedestrians at junctions as the highway code indicates they should. Instead of removing the restrictions on taxis, please expand them.

(7) Local Cllr, (Oxford, Hinksey Park)	Object – COLTA have been asking for this for years and seems a very reasonable accommodation to make that should not impede bus services.
(8) Local Resident, (Oxford, Lye Valley)	Object – I preferred the previous rule to not allow traffic
(9) Local Resident, (Oxford, Magdalen Road)	Object – Needs to be pedestrianised only for safety
(10) Local Resident, (Oxford, Magdalen Road)	Object – They have enough access and don't respect cyclists or pedestrians
(11) Local Resident, (Oxford, Norfolk Street)	<b>Object</b> – I am strongly against this proposal because 24-hour access would cause significant noise to the local community at night when everyone sleeps. This might alleviate the issue if only allowing fully electric vehicles (i.e. those without any combustion engine). Combustion engines will cause heavy noise and pollution to the local community.
(12) Local Resident, (Oxford, Paradise Square)	<b>Object</b> – As a resident living next to Westgate I am already deeply affected by the noise and vehicle and foot traffic. It is not rare that my sleep is affected by the noise pollution from works inside Westgate as well as the busses running late/early. If taxis are allowed access, this noise and disruption will increase. Not only the noise from the vehicles themselves, but the noise from people being picked up/dropped off will also be an issue in this regard. I do not think it is much to ask for people in need of a taxi to walk towards the taxis parked outside of Cornmarket street. The environmental impact too needs to be factored here as many idling taxis and increased road use will increase pollution in the area.

(13) Member of public, (Oxford, Temple Road)	Partially support – As local residents I alws take taxi for my small journey buy cosy aloy.money because of the taxi got permission entry and exit its would be much better for driver and residents
(14) Local Resident, (Oxford, Thame Street)	Partially support – I support hackney but not private hire
(15) Member of public, (Abingdon, Dunmore Road)	Support – Its easier and quicker to get to my destination. Otherwise it adds significant time to my journey which is already disrupted because of the LTNs and roadworks.
(16) Member of public, (Abingdon, Dunmore Road)	Support – As a passenger I 1000% support this. It's so much easier for access and way more convenient.
(17) Member of public, (Carterton, Appleford)	Support – Safety
(18) Member of public, (Carterton, Appleford)	Support – Safety
(19) As part of a Group/Organisation, (Oxford, Milton Road)	Support – Because as a Hackney carriage driver we need access to the link road to cut the evening traffic that occurs from evening shoppers and people leaving theatres/restaurants etc. Also, as public vehicles, I don't understand why we do not have access to every road in Oxford
(20) Member of public, (Cowley, Brasenose Driftway)	Support – Roads are for cars in recent days OCC has made a lot of wrong decisions by closing down roads.  In the sight of OCC by blocking the roads OCC is making air clean and safe zone but occ is totally oblivious of the ripple affects by that
(21) Member of public, (Cowley, Campbell Road)	Support – we support this as this will be so convenient for us to get in and out. A very time saving essential route.

<b>-</b>	·
(22) Member of public, (Cowley, Milton Road)	Support – Convenient and pay less
(23) Local Resident, (Headington, Harcourt Terrace)	Support – Cheaper fares and better for the public. Would much rather someone get into a cab as opposed to their own car after a night out.
(24) Member of public, (Headington Oxford, Chillingworth Crescent)	Support – To support local taxis to access the route 24 hours
(25) Taxi Driver, (Iffley, Freelands Road)	<b>Support</b> – As a taxi Driver in Oxford over the years I have realised we get lots of tourism. Summer is very busy and also throughout the year. Many visitors who use Taxis dont know there is a massive shopping centre which they can go into for shopping or leisure. This link road also helps tourists and local residents who use Taxis in the morning to get to appointment from Train station if Oxpens road is congested. It also keeps our customers, whether they are local or visiting happy that this road is accesible for Taxi Drivers to use to save time and also money.
(26) Member of public, (Oxford, Asquith Road)	Support – I use taxis
(27) As part of a Group/Organisation, (Kidlington, Green Road)	Support – Avoid delay in picking up passenger
(28) As part of a Group/Organisation, (Littlemore, Herschel Crescent)	Support – As a taxi driver I support the proposals to use the service Road 24 hours.
(29) Member of public, (Oxford, Belvedere Road)	Support – Public transport
(30) Local Resident, (Oxford, Abingdon Road)	

	Support – Taxis form a big part of public service and help people move around Oxford swiftly. With the constant congestion around opens I feel to reduce our journey times and fare we should be able to get our taxi drivers to use this route.
(31) Local Resident, (Oxford, Arthray Road)	Support – I strongly believe taxis should be allowed 24 hour access to make it easier and safer for people
(32) Local Resident, (Oxford, Asquith Road)	Support – I strongly support this as it is more costly to get a taxi from anywhere near the Oxford Castle as the driver will have to go the long way around from 7pm which costs an extra pound or 2 depending on the taxi used
(33) Local Resident, (Oxford, Asquith Road)	Support – Taxi will be cheaper because they wont have to get stuck in the traffic on thames street
(34) Local Resident, (Oxford, Aston Street)	Support – Since there is no negative impact on pedestrians, cyclists and bus routes during the permitted times of 7am to 7pm, I see no reason why taxi drivers should be denied 24-hour access - particularly given that between the hours of 7pm and 7am the area is even less busy.  24 hour access will enable a more convenient route for taxis to access their taxi ranks which means I will be able to access taxis with more ease (and quickly) during busy periods.  Enabling 24 hour access is fair for both service users and drivers as it cuts costs caused by longer alternative routes.
(35) Local Resident, (Oxford, Aston Street)	Support – If access is limited to 7am - 7pm, it will effect route access for night shift taxi drivers as they will need to use alternative (longer) routes. This in turn, could cause a decline in customers as taxi journeys will be extended, causing a higher service price - this is extremely unfair for both taxi drivers and service users.  As the number of pedestrians, cyclists and buses is far less in the hours of 7pm - 7am, they won't be negatively impacted by access at said hours.
(36) As part of a Group/Organisation, (Oxford, Benson Road)	Support – It makes journey times shorter and cheaper for passengers which in these times of cost of living crisis is a major thing

(37) Member of public, (Oxford, Boundary Brook Road)	Support – It's low cost saves travelling time easy to get out of work and be home much quicker
(38) Member of public, (Oxford, Bullingdon Road)	Support – I support this
(39) Member of public, (Oxford, Chatham Road)	Support – As a travelling passenger it will be so convenient the journeys in the city will be much quicker and also much I will pay less for my journeys because of the access.
(40) Member of public, (Oxford, Church Hill Road)	Support – I support giving them access.
(41) Member of public, (Oxford, Clive Road)	Support – I frequently use black cabs and would like them to be able to use all routes in Oxford especially late at night
(42) Local Resident, (Oxford, Clive Road)	Support – I support them to be allowed through, due to the traffic around Thames Street, this then supports cheaper fares and also better for passengers com uniting rather than siting in traffic which return creates more emissions. This also supports public transport travel
(43) Taxi Driver, (Oxford, Cowley)	<b>Support</b> – I will be benefiting from the lifting all these restrictions for night drive through westgate without getting ticket for no reason when you are clearly making more pleasant journey for the passenger and yourself so I would like access to these 24/7 that would make my business easier.
(44) Member of public, (Oxford, Cowley Road)	Support – Because it will benefit both taxis and passengers moving away from traffic and helping it to reduce in busy areas

(45) As A Business, (Oxford, Cowley Road)	Support – The ocoene road does get congested a lot when people are trying to get into the Westgate car park and so hold up paying customers which costs them more and holds up taxis
(46) As A Business, (Oxford, Cowley Road)	Support – It will help me get around with or without a customer more efficiently.
(47) Local Resident, (Oxford, Derwent Avenue)	Support – As a taxi passenger it's quick and cheaper to go through Westgate instead of oxpens Westgate car park blocks traffic on the oxpens road very bad
(48) Member of public, (Oxford, Eastfield Close)	Support – As a frequent taxi user it is always convenient and a lot faster and cheeper when the taxi driver is able to use the link rd behind west gate shopping centre
(49) Local Resident, (Oxford, Faulkner Street)	Support – Easy access for taxis to pick up customers which will reduce waiting time for taxis.
(50) Local Resident, (Oxford, Fletcher Road)	<b>Support</b> – Using taxis is more efficient as the side roads have closed so more traffic, therefore people use taxis to get around rather than driving themselves. Not allowing taxis through this is just going to build more anger and frustration of the community.
(51) Local Resident, (Oxford, Fox Crescent)	Support – Equality of access to Oxford cite centre for local residents that benefit from private hire - e.g. wheelchair users.
(52) Local Resident, (Oxford, Frenchay Road)	Support – Helps vulnerable, disabled and elderly people get around the city.

(53) Local Resident, (Oxford, Glanville Road)	Support – As a travelling passenger it will be convenient
(54) Local Resident, (Oxford, Green Street)	Support – It's benefit for every one. Less traffic in park end street while pub and night clubs are open. Elderly people's can pick up later evening in that area as well. It's facilities for all of us.
(55) As part of a Group/Organisation, (Oxford, Harcourt Terrace)	Support – Access is important for our paying passengers
(56) Member of public, (Oxford, Headington)	Support – It is more safer and quicker travelling by taxi during the evenings.
(57) Local Resident, (Oxford)	Support – All the prohibitions of access must be dropped. The council is paid and works for us. How dare you, monitor and tax us when we drive on the roads we built with our money?
(58) Member of public, (Oxford, Iffley Road)	Support – Not enough taxi pick-up points now
(59) Member of public, (Oxford, Iffley Road)	Support – It would allow for faster and cheaper entry to the city. I believe it would also be beneficial for anyone with a disability or isn't fully mobile as it would allow for a pick up closer to the centre. Great idea.
(60) Member of public, (Oxford, Iffley Road)	Support – As a regular user of black cab I support the trade to use westgate bus route. If buses are allowed then taxi should also be allowed. But I don't support out is town taxis or private hires to use this route
(61) Local Resident, (Oxford, Iffley Road)	Support – We support this

(62) As part of a Group/Organisation, (Oxford, Iffley Turn)	Support – It's better for customers financially and time .
(63) Local Resident, (Oxford, Leiden Road)	Support – It makes my journey easier because otherwise the taxi takes me all the way round the main road
(64) Member of public, (Oxford, Leiden Road)	Support – As the people of public can have access at all time to these public services and phd and hackneys do the same things as the busses if not better, more efficient and certainly a lot quicker! Also if I was to get a tv after 7 pm from John Lewis I can't carry that around with me to bus stops I'd need a taxi and if a taxi can't get there what would I do?
(65) Member of public, (Oxford, Lime Walk)	Support – I will pay less for my journey ima taxi and also get to my destination quicker, it's a no brainer for me.
(66) Member of public, (Oxford, Lime Walk)	Support – As a travelling passenger it will be very efficient
(67) Member of public, (Oxford, Marston Road)	Support – It's a really useful link for taxis as a public transport
(68) Local Resident, (Oxford, Mather Rd)	<b>Support</b> – There is no negative impact on pedestrians, cyclists bus routes during permitted hours, therefore it makes no sense to enforce restrictions from 7pm to 7am. This prohibition also lengthens journey time for passengers making their journey more expensive. This would ultimately have a negative impact on both parties.
(69) Local Resident, (Oxford, Mather Road)	Support – As the number of pedestrians, cyclists and buses is reduced between the hours of 7pm - 7am, they most likely won't negatively be impacted by taxi access 7pm - 7am.  I see no reason as to why said restrictions 7am - 7pm should be put in place. Instead access at said hours will enable better public transport for Oxford residents.

(70) Member of public, (Oxford, Mogridge Drive)	Support – I feel this to be bit odd that the taxis are not allowed through the proposed roads at night where normal vehicles are. In my opinion the taxis and taxis drivers are relatively the most safest drivers on the roads.
(71) Local Resident, (Oxford, Mogridge Drive)	Support – It will give taxis to move around the city centre quickly and efficiently instead of sticking in the traffic and also make pickup easy around westgate specially for disabled people.
(72) Local Resident, (Oxford, Newman Road)	Support – Itl make fairs cheaper for customers and allow them to get around town a lot quicker. This will also allow drivers to pick up customers from specific areas rather than requesting customers to walk around to get to the drivers.
(73) Local Resident, (Oxford, Norfolk Street)	Support – Taxi drivers were frequently confused whether they can come to this area or not. If they know they can always come, it would be helpful to local residents by increasing the capacity and availability of taxi cars nearby.
(74) Member of public, (Oxford)	Support – we support this
(75) Local Resident, (Oxford, Oxford Road)	Support – There is no negative impact on the pedestrians or cyclists of the area with this It will make it easier for both the taxi drivers and customers by granting this access as it will allow them to get to more busy areas around the rank more efficiently  More cost effective as well for paying customers as it means longer alternative routes can be avoided
(76) Local Resident, (Oxford, Oxford Road)	Support – Easy for me to use the taxi service
(77) Local Resident, (Oxford, Oxford Road)	Support – Taxi drivers are essential for the running of the city. I often feel unsafe walking around Oxford city centre, especially at night, knowing a taxi can pick you up right outside your location is so important, particularly with the increasing crime rate. It also means people can leave their cars at home, it also encourages people to be less reliant on their own cars.

	Residents, tourists, students, we all must feel safe in our city, and unfortunately less and less people are feeling that way.
(78) Member of public, (Oxford, Park End Street)	Support – It will make public journey easy and quicker.
(79) Local Resident, (Oxford, Preachers Lane)	Support – The cost will be lower
(80) Member of public, (Oxford, Redbridge)	Support – It's cheaper to travel that route, we pay less.
(81) As A Business, (Oxford, Rose Hill)	Support – All public transport should have access to the city including Black Cabs and Private Hire Cabs.
(82) Member of public, (Oxford, Shelley Road)	Support – Taxis and buses should have equal access as they provide public transport.
(83) Local Resident, (Oxford, Speedwell Street, Norfolk Street)	Support – Keep oxford moving
(84) Member of public, (Oxford, St Thomas Street)	Support – I use taxis everyday, it's very convenient using the Westgate route, due to traffic and Road works around the city.
(85) Local Resident, (Oxford, Temple Road)	Support – Take taxi frome carfax usually in afternoon after finish Mt work alws struggle cause there's no taxi I highly recommend to be taxi alws there
(86) Member of public, (Oxford, The Grates)	Support – It's good to avoid the traffic in late evening

(87) As A Business, (Oxford, Townsend Square)	Support – It's a quickest route to get in and out of city centre
(88) Member of public, (Oxford, Vicarage Road)	Support – We support this fully.
(89) Member of public, (Oxford, Wilcote Road)	Support – It save time and fuel
(90) Member of public, (Oxford, Abingdon Road)	Support – I am disabled and I work in the westgate and using the local taxis around the westgate is the only way around for me please let them use it 24 hours a day Thank you
(91) Local Resident, (Oxford, Bartlemas Close)	Support – It will improve service
(92) Local Resident, (Oxford, Barton Road)	Support – Im a taxi driver
(93) Rather Not Say, (Oxford, Baynhams Drive)	Support – Its just because its really good for the taxi driver to move quickly and easy access for the customer 24hrs
(94) Member of public, (Oxford, Belvedere Road)	Support – Taxis should be allowed through bus gates
(95) As part of a Group/Organisation, (Oxford, Belvedere Road)	Support – I'm n behalf of the Hackney Carriage trade, it is absolutely vital that the trade is permitted 24hr access through this route for several reasons. It allows the trade to use the route if there is traffic on the Oxpens. It allows the trade to approach the Carfax rank and the Gloucester green rank quicker in the evening rather than going round the Oxpens/parkend/new rd route. It helps the trade by providing an efficient service to all passengers in and around Oxford city centre including the disabled. Passengers mustn't wait at ranks longer than necessary. Our operations

	through this route has been professional and we've had a great understanding with the buses not to instruct their movements. We will continue this when access is obtained for 24 hours.
(96) As part of a Group/Organisation, (Oxford, Bertie Place)	Support – Efficient way of getting to city centre/ quicker to get into city centre
(97) Local Resident, (Oxford, Botley Road)	Support – I support this for taxis
(98) As part of a Group/Organisation, (Oxford, Briar Way)	Support – It allows easier access for taxis with paying customers when Thames Street is blocked
(99) Rather Not Say, (Oxford, Churchill Road)	Support – Better for me as i would pay less to get to town as sometimes there's traffic on Oxpens street
(100) Local Resident, (Oxford, Clive Road)	Support – I will pay less for my journey because of the access through this road
(101) As part of a Group/Organisation, (Oxford, COLTA)	Support – Taxi Driver LEVC
(102) Local Resident, (Oxford, Cowley)	Support – We support this
(103) Member of public, (Oxford, Cowley)	Support – Save time and money
(104) Member of public, (Oxford, Cowley)	Support – We support this

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(105) Rather Not Say, (Oxford, Cowley Road)	Support – Local business sporting
(106) Local Resident, (Oxford, Cowley Road)	Support – Quick access through traffic time and save the time
(107) As part of a Group/Organisation, (Oxford, Crescent Road)	Support – I'm a local hackney carriage driver and this access is vital to get access to our city ranks especially Carfax in the late evening
(108) Rather Not Say, (Oxford, Cricket Road)	Support – To help improve the flow of services, and reduce waiting times
(109) Member of public, (Oxford, Cricket Road)	Support – I will pay less
(110) Member of public, (Oxford, Dashwood Road)	Support – As a paying passenger I think it's important that taxis are given access through this road
(111) Local Resident, (Oxford, Desborough Cresent)	Support – I am disabled person unable to use the bus, it is important as it allows disabled people to use taxi service to Westgate
(112) Member of public, (Oxford, Dora Carr Close)	Support – My family use taxi. It will save more time and money to travel to train station and from. easier for quick transport of public.
(113) Member of public, (Oxford, Dynham Place)	Support – I use taxis and it seems a common sense thing to allow the taxis through this route

(114) As part of a Group/Organisation, (Oxford, Fairlie Road)	Support – In the late evening access through this is vital in the evening to get to our city ranks quicker
(115) Member of public, (Oxford, Falcon Close)	Support – Because private hire and taxis need to be able to avoid the traffic at all times of the day
(116) Member of public, (Oxford, Farm Close)	Support – I support the Taxes and private hire to have access around the Westgate centre 24 hours because once they use it during the day time they can use it at evening as well.
(117) Local Resident, (Oxford, Faulkner Street)	Support – More availability of cabs will insure choices.
(118) Local Resident, (Oxford, Faulkner Street)	Support – Convenient for public
(119) Local Resident, (Oxford, Fletcher Road)	Support – No objection at all
(120) Local Resident, (Oxford, Fletcher Road)	Support – Taxis are our need to move around city centre
(121) Member of public, (Oxford, Fox Crescent)	Support – As 7.00am to 7.00pm access is available, don't see why taxi services shouldn't be allowed access All hours. This will help public members a quicker service as Taxis will have faster more efficient routes to reach Ranks. Surely shorter routes will also reduce pollution too.
(122) Member of public, (Oxford, Garsington Road Cowley)	Support – We support this

(123) As a business, (Oxford, Glanville Rd)	Support – Easy access for the costumers
(124) Local Resident, (Oxford, Glanville Road)	Support – Preferred method of travel when shopping in person, if not available will just shop online
(125) As part of a Group/Organisation, (Oxford, Helen Road)	Support – To get to the taxi rank quicker
(126) As a business, (Oxford, Horspath)	Support – I'm a taxi driver
(127) Local Resident, (Oxford, Howard Street)	Support – Because it will cost me alot less and less time to travel than having to go all the way round getting stu k in traffic which will add unnecessary time and cost
(128) Rather Not Say, (Oxford)	Support – I think will be helpful for old people and people with disabilities and more for tourists students families
(129) Member of public, (Oxford, Iffley Road)	Support – As a travelling passenger this will save me so much time and money as we will bypass most the traffic on the oxpens.
(130) Local Resident, (Oxford, Jericho)	Support – I'm a pensioner an can't walk an taxis an private hire are my only transport an walking from end of the westgate to the other end is impossible so please allow them
(131) Local Resident, (Oxford, Juxon Street)	Support – I am supporting because it would be very helpful for certain individuals that struggle to go anywhere far on their own especially in the centre where there's so much going on. It would make a massive impact as this would help them get to their destination as close as possible.

(132) Member of public, (Oxford, Kelburne Road)	Support – It's more convenient.					
(133) Rather Not Say, (Oxford, Kenilworth Avenue)	Support – Taxis need access through all routes for the benefit of the paying passenger					
(134) As part of a Group/Organisation, (Oxford, Laburnum Road)	support – Access 24 hr is vital so we can get to our ranks quicker					
(135) Local Resident, (Oxford, Leiden Road)	Support – Because I find it would benefit the public when they use taxi					
(136) Member of public, (Oxford, Lenthall Road)	Support – It will make life easier, and will cost me less, as I use taxi regularly.					
(137) As A Business, (Oxford, Little Clarendon Street)	Support – No comment					
(138) Member of public, (Oxford, London Road)	Support – I fully support the proposals because it's quick to get to station though the link rather than going through oxpens and it's cheaper the Westgate car park is blocking all the traffic					
(139) Member of public, (Oxford, Marston Road)	Support – Great to drive through avoid the bad traffic and quick service just like the bus					
(140) Member of public, (Oxford, Marston Road)	Support – It will cost me less to travel					
(141) Local Resident, (Oxford, Massey Close)	Support – Because these are public service vehicles which are the same as buses so all public vehicles should be treated the same					

(142) As A Business, (Oxford, Mather Road)	<b>Support</b> – As it has no negative effect on anyone between 7am and 7pm instead it helps taxi drivers and passengers so definitely it will have no negative effects on anyone at all. If the taxi drivers are allowed to use the link route 24 hours a day it would help to improve their service and reduce the charges for customers. Furthermore it will be environmentally friendly as it would reduce the journey distance.					
(143) Member of public, (Oxford, Morrell Avenue)	upport – It's cheaper and quicker through the link traffic is very bad on oxpens most times					
(144) Member of public, (Oxford, Nunham Courtney)	Support – As a paying passenger Taxi should have access to all routes within city centre at all times					
(145) Taxi Driver, (Oxford)	Support – I support this cause due to it being convenient and quicker for my passengers to be able to enter throu bus station to be able to access town. It's saves them money and time.					
(146) Member of public, (Oxford, Palmer Road)	Support – It is more convenient as they too are forms of public transport used by us the public. It will allow quicker cheaper journeys					
(147) Member of public, (Oxford, Park End)	Support – I support the idea of allowing taxis 24 hour access as I'll be saving time and money on my journeys! Times are tough, every little helps!					
(148) Member of public, (Oxford, Parsons Place)	Support – Fully support					
(149) Member of public, (Oxford, Ridgefield Road)	Support – It will reduce passengers travel time.					
(150) Member of public, (Oxford, Rivermead Road)	Support – People getting on time from a to b and saving money					

(151) Local Resident, (Oxford, Speedwell Street)	Support – It would benefit disabled people or elderly to hop on and off in that area, and everyone too.					
(152) Local Resident, (Oxford, Stansfeld Place)	Support – We support this					
(153) As A Business, (Oxford, Swinburne Road)	Support – It will speed up travel times and reduce costs for customers,					
(154) Member of public, (Oxford)	Support – We are having a lot of complaints from customers. As a lot of time, we're not able to get to them.					
(155) Local Resident, (Oxford, Titup Hall Drive)	Support – So when elderly passengers go west gate they can go close as possible					
(156) Taxi Driver, (Oxford, Waynflete Road)	Support – This affects the business and people needs to pay more					
(157) As part of a Group/Organisation, (Oxford, Wharton Road)	Support – Helps the taxi trade to speed up the journey					
(158) Rather Not Say, (Oxford, William Morris Close)	Support – If Hackney can use it so as phv can use it too					
(159) As part of a Group/Organisation, (COLTA)	Support – Support for taxi drivers.					
(160) Local Resident, (Oxford, Botley Road)	Support – I'd like to support the proposal because its important for all the public members or disabled persons to get a taxi efficiently to those areas .					

(161) Local Resident, (Oxford, Headington, Chillingworth Crescent)	Support – It will most likely make my fare cheaper cause less disruption towards congestion and generally give a better service to everyone involved.					
(162) Rather Not Say, (Oxford, Nuffieled Road)	Support – that would make accecciable for all commuters					
(163) Member of public, (Oxford/Sandhill, Merewood Avenue)	Support – as a travelling customer it will be so convenient when you have a heavy shopping					
(164) As A Business, (Oxford, Cowley Road)	Support – When I use a cab I don't want to be stuck in speedwell st and Thame st.					
(165) Local Resident, (Oxfordshire, Parsons Place)	Support – I support fully giving them access					
(166) Member of public, (Oxford, Belvedere Road)	Support – Public transport					
(167) As A Business, (Oxford, Nothfolk Street)	Support – We are a Hotel operating with high groups of guests that require taxi					
(168) Member of public, (Rose Hill, Danvers Road)	Support – It will be so easy for me and my family to get home in the rush hour on some evenings.					
(169) Member of public, (Rose Hill, Lenthall Road)	Support – Cut journey time and costs as a passenger.					
(170) Member of public, (Watlington, Ash Close)	Support – The council is already doing enough to try to kill the taxi trade, it'll mean cheaper journeys and convince to all					

(171) Rather Not Say, (Berinsfield, Cherwell Road)	No objection – I'm a Taxi driver and most of fhe times cutomers say why you following the long route and arguing.  Additionally, It will be good because of the traffic we can drop our customer safe and fast
(172) Rather Not Say, (Kidlington, Waverley Avenue)	No objection – Convenient for public, especially for old people.
(173) Local Resident, (Oxford, Duke Street)	<b>No objection</b> – It isnimportant to offer a full range of transport options to visitors to town. The trend within the council has been to limit access. I support any loosening if the restrictions that currently exist.
(174) Local Resident, (Oxford, Palmer Road)	No objection – Westgate should be access for 24 hours for private hire taxi to use the road.
(175) As part of a Group/Organisation, (Oxford, Belvedere Road)	No objection – Fully support access
(176) As a business, (Oxford, Cowley Road)	<b>No objection</b> – Why make journey longer and cause more pollution. Besides if buses are allowed 24 hour access then why not cabs?
(177) Member of public, (Oxford, Cowley Road)	No objection – Convenient
(178) Member of public, (Oxford, Marston Road)	No objection – No comment

(179) Local Resident, (Oxford, Mortimer Drive)	No objection – Better service
(180) Local resident, (Oxford, Tennyson Lodge)	No objection – I have no comment regarding the extension of permission for taxis and PHVs to use Norfolk St 24 hours a day, other than it comes as no surprise.  Your letter makes passing reference to the current restriction on dropping off/picking up on Norfolk St (sometimes more honoured in the breach than the observance). It is not clear from the letter or the public notice whether it is proposed also to remove this restriction. I should like to remind you that the original reason for its imposition was to avoid the creation of an informal "taxi rank" outside our homes, which could lead to congestion both on the road and the pavements and potentially excessive noise from night-time revellers. I hope therefore that in deciding this proposal the County Council maintains its position on this aspect.



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3rd June 2024

#### By e-mail only: christian mauz@oxfordshire.gov.uk

Christian Mauz
Senior Officer (TRO and Schemes) Network Management
Directorate of Environment & Place
Oxfordshire County Council
County Hall
New Road
Oxford|
OX1 1ND

Dear Mr Mauz.

STATUTORY CONSULTATION – Ref: CM/12.6.320/P0162
Oxfordshire County Council (The City of Oxford) (Central Area) (Traffic Management) (Consolidation) Order 2003: Westgate area (Oxford) proposed Taxi/Licensed Private Hire access amendment

I refer to the proposed Traffic Regulation Order changes referenced above. City of Oxford Motor Services Limited (Oxford Bus Company) and Thames Travel (Wallingford) Limited ("Thames Travel", "TTW") formally objects to the proposed Order. The basis for this objection is set out below.

#### The proposals

The effect of the proposals – in order to help improve operating efficiencies throughout the day – is to remove the existing 'Prohibition of Motor Vehicles' restriction on Taxis & Licensed Private Hire Vehicles between the hours of 7am and 7pm in & around the Westgate shopping centre in Oxford, to allow for '24-hour' access on the following lengths of road:

- 1. Norfolk Street:
  - a. southwards from Castle Street,
  - b. northwards from Speedwell Street,
- 2. Speedwell Street:
  - a. westwards from the access point to Westgate southeast service area,
  - b. eastwards from Norfolk Street.

The proposals involve extending the hours during which licensed Taxis ("Hackney Carriages", "HCVs") and Private Hire Vehicles ("PHVs") can use the lengths of road specified, which form the principal and indeed only bus access route around the south and west side of the City Centre. They are already permitted to use the link during the daytime hours of 7am to 7pm. The current permission expressly prohibits pick up or set down in the link.

The Order amendment would permit 24h access.

The direct effect would be that NCVs and PHVs would be present at all times in the bus link and interchange.

#### Justification for the proposals

The proposals have been made to address what appears, not unreasonably, to be an irrational situation. The original case to allow HCVs and PHVs was based on a combination of arguments surrounding customer convenience and to support taxi efficiency and productivity, notwithstanding that the bus link is actually aligned in a quite circuitous way. Thus, the number of taxi trips for which use of the bus link reflects a credibly preferable routing, is not that great. This naturally limits the level of additional vehicular traffic presented by HCV and PHV use during the current hours of 0700h-1900h.

It appears, from first principles, reasonable and rational to extend this concession during less busy evening and night-time hours.

Broadly we agree that this is the case. The *principle* of allowing 24-hour access to NCVs / PHVs to the bus link is not a matter of objection. However, it does present significant safety concerns *in practice*. This is the basis for our concern.

#### The implications of the proposals

Intense bus operations are maintained after 1900h in the bus link, until 2000h, until when most core daytime frequencies are maintained. From this time frequencies "step down" by about half, and are maintained until at least 2300h, in many cases 0000h.

In the same way, prior to taxi access commencing, frequencies have typically built up to close to peak levels by 0630, but first journeys commence around 0445 and regular frequencies are offered on most routes from 0600h.

Thus, during a good deal of the proposed extended hours, there will remain significant interaction between buses and taxis in the interchange link.

Local bus services do not operate in the link, in broad terms, between the hours of 0100h and 0445h, with the exception of the Stagecoach N1 service which operates 24/7. However, it should also be stressed that scheduled coach services - including our

Airline service as well as the Oxford Tube - operate through the bus link 24 hours a day, 7 days a week as well. Notwithstanding this, it is evident that for much of the period concerned, bus operations as well as movement of pedestrians and cyclists are greatly lesser than during core daytime hours, when HCVs and PHVs are already present in the link.

The link also functions as the principal local bus interchange for the City and much of wider County. As such the streets are flanked by near continuous bus stands on both sides, that were purpose-designed to maintain the free flow of buses while operating independently: in other words, buses are able to pull out safely from behind a bus stopped in front of them. The space required to achieve this is clearly at a premium, and there is no room to provide dedicated kerb space to allow taxi pick up and set down facilities within the link. Furthermore, given the daytime frequencies and range of destinations involved, it would be irrational in policy terms to facilitate such vehicles, in effect "abstracting" bus passengers from stops.

Ample facilities exist to support those who wish to supply and use taxi services elsewhere in the city centre. This includes in George Street immediately adjacent to the principal coach terminal at Gloucester Green. As such pick-up and set down by HCVs and PCVs is prohibited. This prohibition will apply to the 24-hour access arrangement proposed.

#### **Basis of Objection**

Our objection surrounds the enforcement and enforceability of the existing and proposed Order where pick-up and set down by HCVs and PHVs in the link takes place, despite being prohibited currently.

This has safety implications.

The illegal use of the link by taxis to pick up and set down causes conflicts that can and do lead to accidents and damage. The bus stops are not designed to accommodate these movements and as such, to effect them, a minority of taxi drivers on occasions perform sudden, erratic and entirely unpredictable manoeuvres. Taxis driving on the wrong side of the road to access the bays on off-side kerb are just one such observable manoeuvre, one such incident having led to a collision in Castle Street within the 2 years of the trial.

Since the start of 2021, there have been 13 collisions between taxis and buses in Oxford city centre, all of them at bus stops/interchanges, and generally involving taxis seeking to pick up or set down – illegally - in marked bus stop clearways.

There is currently no apparent way to enforce the current ban on picking up and setting down in Norfolk Street or Castle Street, thus we consider the risk of collision to be elevated as a result of these proposals. The kind of behaviour that concerns us obviously has implications at least as serious for vulnerable road users.

It should be considered that after 1930h when bus frequencies start to decline, there may be greater incentives for the public to seek to hail a taxi in this area. After 2200h when the night-time economy is starting to wind down, the demand for taxi services clearly reaches a higher level, notwithstanding that significant levels of bus frequency are operated on the busier routes. The proposed Order amendment will tend to facilitate taxis responding to what in effect are "market forces" to pick up and set down in the link in way that, perhaps counter-intuitively, will intensify conflict and hazard substantially in the bus link interchange. There is an also a much greater probability that the level of awareness of pedestrians in the space at these times will be lower or impaired, this also being hours of darkness, further elevating levels of risk.

While the *principle* of the Order draws no objection from OBC and TTW, the likely abuse of the Order requires the Council to present to bus operators how it intends to ensure that the Order is properly complied with.

This is not presented. Accordingly, the statutory process leaves with **no alternative** but to raise formal objection.

There may additionally be a case to provide a time-limited taxi rank at an identified stop/s that is not used between 2300 and 0500. One obvious option exists on the south side of the Westgate Centre at stop S3, used only by City Sightseeing buses during the day. The adjacent stop S4 is served by the 24-hour coaches, to and from which access by taxi is desirable during these hours in particular.

Notwithstanding, we invite the Council to address our objection by collaborative discussion with the bus and coach operators, something that we greatly regret has not taken place, despite the context of the proposals, which is a major public transport link and facility.

#### **Concluding Comments**

We therefore invite the Council to withdraw the current Draft Orders and engage positively with us in order to arrive at a proposal that achieves the full range of Council transport policy objectives, rather than directly undermining those relating to public transport.

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Managing Director