

## **Annex 5 - Officer responses to key stakeholder consultation comments**

### **Activate Learning (Oxpens campus)**

Activate Learning recognises the importance of addressing traffic congestion within Oxford. It broadly supports initiatives designed to improve the transport infrastructure in and around the city and promote sustainable travel, but is concerned that the temporary congestion charge proposals could negatively impact its ability to deliver essential teaching and learning services to our students.

It seeks further clarification and reassurance regarding the scheme, particularly concerning the accessibility of permits. It requests that all essential users, including staff and vulnerable students who rely heavily on support from family and friends giving lifts to and from college, will fall within the scope of these exemptions.

Additionally, Activate Learning requests that surplus revenue generated from congestion charges to be reinvested into initiatives specifically designed to support learners within the city. This could include subsidising transport costs for students facing financial or logistical barriers.

### *Response*

Any staff driving to the Oxpens site and parking in spaces provided by Activate Learning can apply for a permit giving free access through the congestion charging points. Residents of Oxford wanting to drive family to Activate Learning can do so without paying the congestion charge by using their day passes associated with a resident's permit. Alternatively, the site is very well located in the city centre for bus services all over the city which are expected to be quicker and more reliable as a result of the congestion charge scheme. Revenue raised by the scheme can be used to improve transport options – including bus services.

### **BMW (Mini Plant Oxford)**

BMW (UK) Manufacturing Ltd expresses general support for Oxfordshire County Council's goals to reduce congestion and promote sustainable travel. While the company has no major objections to the principle of a congestion charge, it raises concerns about the transparency of the modelling used to support the scheme and the potential impact on logistics and employee travel. BMW calls for greater clarity on traffic forecasting and urges the Council to monitor and mitigate displacement effects, particularly around key junctions that are critical to its Just-in-Time supply chain.

- BMW requests greater clarity on the modelling used to justify the scheme, including:
  - The specific data inputs used.
  - Forecasting assumptions regarding traffic flow and environmental impact.
  - Methodological details that underpin the projected outcomes
- BMW raises specific concerns about traffic displacement effects, particularly at:
  - Cutteslowe Roundabout.
  - Green Road Roundabout.
- Increased congestion at these points could:
  - Disrupt delivery schedules.
  - Affect production reliability.
  - Introduce operational inefficiencies

### *Response*

There is plenty of detail about the predicted impacts of the congestion charging points on the city's transport network – the report of the outputs of the Department for Transport approved modelling techniques was published alongside the consultation. Vans and HGVs will be exempt from the charge and the impacts will be carefully monitored – feedback from businesses like BMW will be very welcome after the scheme starts if approved, in order to help understand the effectiveness or otherwise of the scheme. If approved, the impacts of the congestion charging scheme will be monitored very carefully

### **CoHSAT**

The Coalition for Healthy Streets and Active Travel (CoHSAT) strongly supports the Temporary Congestion Charge for Cars in Oxford. This measure is seen as an interim solution until the Traffic Filters can be implemented on an experimental basis. CoHSAT believes that the congestion charge will bring significant benefits, including improved fairness, freedom of choice, health and wellbeing, and better journeys for all. The group criticises a petition opposing the charge as misleading and supports alternatives proposed by the Citizens' Assembly, including car-free zones and weight-based charging.

### *Response*

Officers consider the current proposal for a temporary congestion charge followed by the trial traffic filters will have a significant positive impact on congestion and the negative impacts it has on the transport network. Whilst a suggestion not without merit, changes to the proposals such as weight based charges is not deemed feasible for a temporary congestion charge scheme due to the complexities this

would add. It is therefore not proposed as part of this scheme. Other policies may be better suited to tackle the problem of larger vehicles on a historic road network which the county council will be investigating further.

## **Cyclox**

Cyclox, the voice of cycling in Oxford, strongly supports the proposal for a temporary congestion charge in Oxford. The organisation believes that the charge will significantly reduce motor traffic, making bus journeys faster and more efficient, and making cycling and walking more attractive and safer. Cyclox also believes that the proposal will help those on lower incomes to get around the city more easily.

## **Headington Liveable Streets**

Headington Liveable Streets (HLS), a community group advocating for safer and healthier neighbourhoods in Headington, strongly supports the temporary implementation of the congestion charge and associated traffic reduction measures. The group views the scheme as essential for reducing through-traffic, improving bus services, and promoting sustainable transport. However, HLS also believes the current plans do not go far enough and calls for stronger pricing, stricter permit controls, and additional traffic mitigation in residential areas. They urge Oxfordshire County Council to reinvest funds raised into equitable transport solutions and enhanced safety measures for Headington residents.

## *Response*

The council is considering all suggestions for how to invest revenue raised by the congestion charging scheme if it is approved. This is likely to include bus and park & ride services, some of which would benefit residents and people travelling to and through Headington

## **Ice Hockey UK**

Ice Hockey UK (IHUK), represented by The Lord Wrottesley, has formally expressed concern regarding the lack of engagement with the local ice hockey community in relation to the proposed congestion charge. The organisation highlights that no consultation has taken place with Oxford-based clubs, despite the significant implications for access to the Oxford Ice Rink.

IHUK emphasises that driving to the rink is essential for players and families due to the timing of training sessions and the need to transport heavy equipment. The anticipated financial burden—estimated at £350–£500 annually per family—could

lead to reduced participation, threaten club viability, and impact the rink's sustainability.

The letter underscores Oxford's historic contribution to British ice hockey and the current growth of the sport, including recent international achievements by Oxford-based athletes. IHUK calls for immediate dialogue with affected stakeholders and recommends exploring alternative access models, such as car registration-based exemptions used at other UK rinks, to protect community sport and ensure continued access to the facility.

## **Oxford Ice Rink User Consultation (survey)**

### **Oxford Junior Stars (Ice Hockey)**

The Oxford Junior Stars (Ice Hockey) is the most frequently mentioned club, with a significant number of respondents indicating membership. Many also list this club alongside others, such as the Oxford Rising Stars, Oxford Midnight Stars, and Oxford 84's, highlighting its central role in the Oxford Ice Rink community.

### **Oxford Rising Stars and Related Ice Hockey Clubs**

Oxford Rising Stars (Ice Hockey) is another prominent club, often mentioned both independently and in combination with other ice hockey teams like Oxford City Stars, Oxford Midnight Stars, Oxford 84's, RAF Blue Wings, and Oxford Shooting Stars. This cluster reflects the popularity and diversity of ice hockey opportunities at the rink.

### **Figure Skating and Dance Clubs**

Figure Club and OXIST (Oxford Ice Skating Club) are well-represented, with several respondents also mentioning the Junior Dance Club. These clubs cater to those interested in figure skating, ice dancing, and general skating activities, indicating a vibrant figure skating community at the rink.

### **Fans, Spectators, and Non-Members**

A notable portion of responses identify as fans, spectators, or non-members. Some combine these roles with club memberships, while others explicitly state they are not affiliated with any club. This suggests the rink attracts a diverse audience, including active participants and supporters.

### **Other Clubs and Miscellaneous Memberships**

A smaller group of respondents mention 'Other' clubs or combinations not captured by the main categories. These include fewer common clubs or unspecified affiliations, reflecting the broader range of activities and interests present at the Oxford Ice Rink.

### *Response*

Following the start of the consultation, county officers met city colleagues to discuss the potential implications of the congestion charge proposals. A separate meeting was also arranged for county officers to hear directly the views and concerns of those representing a number of different ice rink user groups. Survey data from users of the ice rink has been shared with officers to illustrate the challenges that they feel the congestion charge would present. As a result, it is now recommended that a permit to allow regular members of clubs and training programmes to be driven to the ice rink for free in a car. This is mainly in recognition of the fact that for many users, it is not possible to use bus or park & ride because of the need to carry very heavy equipment or because services do not offer a realistic choice to travel due to very early starts or evening visits to the rink.

### **Meadowbrook College**

Meadowbrook College expresses concern over the potential unintended consequences of the proposed congestion charge, particularly regarding traffic displacement and access for vulnerable students and staff. While supportive of efforts to reduce traffic, the College urges Oxfordshire County Council to adopt a broader monitoring strategy and to ensure exemptions for essential school-related travel. The response highlights the need for proactive planning to prevent increased congestion on critical routes and protect accessibility for education and support services.

### *Response*

All staff and pupils will continue to be able to drive or be driven to school without passing through a charging point and many will not even need to take a different route. Most staff living outside the city will need to take a short diversion at most to even if they have to avoid the charging point by using the A40 and Marsh Lane (rather than driving through Summertown). There will be a permit to allow children with special educational needs to be driven the most direct route through a charging point if needed. Some staff and students will not need to alter their route.

The impacts of the temporary charging scheme will be monitored very carefully if it is approved by Cabinet.

### **Landsec (on behalf of Westgate Oxford)**

Whilst Landsec recognises the need to improve connectivity to Oxford and to make it more welcoming by making it greener and reducing traffic, it opposes the temporary congestion charge. This is because it considers that without a substantial investment in public transport or other sustainable modes, the charge would hamper local businesses and economic growth.

Landsec considers that the proposals would act as a disincentive to those who cannot afford the charge or who get fined for accidentally not paying the charge. It points out that their car park serves the wider city centre and not just the Westgate development. A Landsec conducted survey showed that 30% of their guests weren't aware of the congestion charge proposals

Landsec is concerned about the timing of the proposals given that the Botley Road continues to be closed. It is also concerned about the ongoing lack of investment in new park & ride or other public transport. This could lead to a drop in visitor numbers. A public awareness campaign for residents and visitors should be a priority if the scheme is approved.

Landsec's response concludes by suggesting how to turn the proposal into an opportunity if it is approved, by bringing forward delivery of city centre public realm improvements accompanied by better wayfinding, particularly from the station to Castle Quarter and Westgate.

### *Response*

The vast majority of Westgate visitors don't arrive by car and there is no staff parking so improving the alternative modes of transport is a vital part of any strategy to improve access to the Westgate itself as well as the rest of the city centre (more than 90% of city centre visitors don't arrive by car). The congestion charge proposals will make buses quicker and more reliable and walking and cycling safer and more attractive. This will help mitigate the ongoing problems across the city's transport network caused by the ongoing closure of the Botley Road. The bus operators, central government and Oxfordshire County Council has recently invested £150m in brand new electric buses which has significantly improved the bus offer in the city. We now need to reduce congestion to make further improvements. The current proposal, if approved, would be to use the revenue from the congestion charge to provide further discounts or free park and ride buses – many of which serve the Westgate shopping centre directly.

Residents of Oxford and Oxfordshire will be able to able for 100 and 25 free day passes respectively. So even for those that need to travel by car, will still be able to without incurring a charge on most visits.

If approved by cabinet, the council will embark on a comprehensive publicity campaign to ensure as many people as possible are aware of the need to pay a congestion charge fee to get the very heart of the city centre AND how to apply for a residents permit to give free access through the charging locations AND how much the non-car alternatives will improve once congestion is tackled effectively across the city.

### **Layla Moran MP for Oxford West & Abingdon**

Layla Moran acknowledges the necessity of reducing traffic in Oxford due to the city's medieval layout, population growth, and increased vehicle ownership. She supports the proposal's aim to improve bus services and promote active travel. However, she raises concerns about the allocation of permits and the impact on residents of Kennington and Cumnor, as well as the need for better bus services to rural areas and schools. She also highlights the financial impact on users of the Oxford Ice Rink during the Botley Road closure.

### *Response*

Officers recommend the introduction of a permit that allows those users of the ice rink who are members of teams, clubs or training programmes to drive for free through the congestion charging points.

Comments on how the temporary congestion charge scheme works if approved – including permit allocation etc will be welcome after it starts. It is expected that charging revenue will be put towards making Park & Ride cheaper which will benefit people living in more rural areas. Reduced congestion in the city is expected to make buses from Kennington and Cumnor faster and more reliable and permits will be available to enable people to drive through congestion charging points for free.

### **Letter to Cllr Andrew Gant from member of the public on behalf of a number of residents (in relation to impacts on Woodstock Road)**

The letter addresses concerns raised by residents regarding the Temporary Congestion Charge Scheme (CCS) with the primary focus being on the disproportionate impacts on Woodstock Road, including increased traffic, air pollution, and the adverse effects on residential areas and school routes. The letter calls for transparency, a reassessment of the scheme's impacts, and full disclosure of data and assessments. It suggests that the presentation of the proposals is

misleading because has omitted the detrimental impacts (including air quality and road safety) of additional traffic on outer sections of Woodstock Road.

### *Response*

Figures 3-2 and 3-3 in the Modelling and Income Forecasting Report show increased traffic on the northern sections of Woodstock Road. This was also acknowledged in the traffic filter assessment with the mitigation being switching the bus lane at the northern end of Woodstock Road, supported by both bus operators. This work has been completed.

The reporting clearly states that, while the overall impact of the proposed scheme is one of reduced traffic demand and traffic flows across the city, behavioural change, including re-routing, is expected to lead to a minority of roads seeing increases in traffic volume.

The caveats and limitations in Sections 1.20 and 1.21 of the Modelling and Income Forecasting Report include that the modelling results should be used to support an understanding of the likely impacts of the proposals at a strategic level, but should not be seen as a precise forecast of impacts.

The report also states that "The model itself is a strategic model – representing the whole of Oxfordshire and beyond – and is therefore more reliable in terms of its forecast impacts at a strategic level (e.g. impacts on overall car demand), and less reliable at more granular levels of detail."

The traffic forecasts take account of changes in travel times as a result of changes in traffic flow. The transport model is a strategic model and is only expected to provide an overall impact of the proposals. It does take account of capacity and delays at major junctions in Oxford, and estimates the change in routes used by drivers to minimise delays.

Figure 2-1 of the Air Quality Technical Note (Annex 11 but also published as part of the consultation) clearly shows that some of the greatest negative impacts on air quality are forecast at monitoring sites along the northern section of Woodstock Road. It is estimated that AADT increases by 9 – 17 %, and results in an NO<sub>2</sub> increase of 1.2 – 1.5 µg/m<sup>3</sup>. The monitoring sites at these locations are not at risk of exceeding annual mean NO<sub>2</sub> limits and are still predicted to be below the local limit of 30µg/m<sup>3</sup>.

The modelling indicates that the reduction in traffic would make walking & cycling more attractive and would be expected to lead to an increase in walking and cycling demand. While some roads may see an increase in traffic, the overall reduction in car demand is anticipated to create a safer environment for pedestrians and cyclists at a city-wide level.



## **Lowland Rescue Oxfordshire**

Lowland Rescue Oxfordshire (OxSAR) is a volunteer organization that provides specialized search and rescue services in Oxfordshire. The team is composed of 100 volunteers who are ready to mobilize at any hour to assist emergency services. OxSAR is concerned that the proposed Oxford temporary congestion charge could significantly impact its ability to operate effectively, as it would impose a financial burden on volunteers who already contribute their time and resources without compensation. OxSAR urges that volunteer response teams be included in the scope of exemptions to ensure their continued ability to support emergency services.

### *Response*

OxSAR vehicles that are not cars will be exempt from the congestion charge. If OxSAR's staff use their personal cars for the rescue work, and they are carrying goods and equipment that cannot be transported on buses or by bike it will be possible for them to apply for a permit to drive through the congestion charge points for free – car used as a goods vehicle.

## **Oxford Brookes University**

The University supports the initiative's goals to reduce traffic, improve bus services, enhance walking and cycling safety, reduce air pollution, and promote community health and wellbeing. However, the University has raised several operational and student-related considerations that it considers need to be addressed to ensure the scheme's success and minimize its impact on the University's operations and community.

- **Health and Care Worker Permits:** The University seeks confirmation that permits for professional or voluntary community health and care workers include students on placements with NHS trusts and other care providers.
- **Accommodation Arrivals and Departures:** The University requests consideration for alternative arrangements during student move-in and move-out dates to minimize the impact of congestion charges.
- **Bus Services:** The University highlights the importance of existing bus routes for sustainable travel and requests reassurance that the scheme will not negatively affect bus services' punctuality and frequency.
- **Operational Vehicles:** The University seeks confirmation that its operational vehicles for deliveries will be eligible for permits to service campuses across Oxford.
- **Staff Travel:** Many staff members live outside the ring road, and the University requests consideration for suburban and rural bus travel to support staff and students accessing campus sites.

- Day Passes: The University asks for the provision of day passes for staff who live outside Oxfordshire but work at sites near the proposed congestion charge locations 1.
- Impact of LTNs: The University notes the negative impact on bus services following the introduction of Low Traffic Neighbourhoods (LTNs) and seeks to avoid similar issues with the temporary congestion scheme.

### *Response*

Students working on NHS placement and needing to use their car to visit multiple locations in the city to care for patients will be able to apply for a community health and care worker permit.

The proposals are expected to improve the speed and reliability of bus services across the city including those serving multiple Oxford Brookes sites.

Delivery vehicles i.e. vans or lorries will be exempt from the charge. Cars used by a business (Oxford Brookes) as goods vehicles for carrying goods and/or equipment will be eligible to apply for a permit to drive through congestion charge locations for free.

Staff simply driving to work would not be eligible for permits to drive through the congestion charge locations – if driving from outside of Oxfordshire, any diversion that is needed to reach their place of work would be a small proportion of their overall journey. Park & Ride serving a number of Oxford Brookes sites is also expected to become more attractive as an alternative to driving to work when the congestion charge scheme starts if approved.

LTNs were intended to be part of a wider strategy to tackle congestion across the city which included traffic filters. The trial has not been possible due to the ongoing closure of Botley Road. The temporary congestion charge is expected to improve conditions for buses, cyclists and pedestrians as well as journeys by exempt vehicles and those with permits – ahead of the reopening of Botley Road. In any case, there has been chronic congestion in the city for many years, well before LTNs were introduced.

### **Oxford City Council**

Oxford City Council formally opposes the proposed Temporary Congestion Charge in its current form. The Council expresses deep concern over the scheme's disproportionate impact on vulnerable and lower-income residents, citing its regressive nature and limited exemption criteria. It highlights risks to essential service delivery, including housing support, waste collection, and community care, particularly where staff rely on vehicle access during unsociable hours.

The response also underscores the inadequacy of current public transport infrastructure, especially off-peak and night-time services, and calls for urgent investment in alternatives such as Park & Ride. Economic concerns are raised regarding reduced footfall in the city centre, with potential harm to small businesses, leisure facilities like the Ice Rink, and cultural venues.

Strategically, the Council warns of administrative burdens, unclear exemption management, and the risk of the central zone expansion. It urges reconsideration of the proposal and further consultation to develop a more equitable, inclusive, and operationally viable plan that reflects Oxford's unique needs and protects its most disadvantaged communities.

### *Response*

Chronic congestion in Oxford negatively affects journeys by residents, businesses and service providers. This includes people living in deprived areas of the city. Currently, those who don't have access to a car depend on alternative modes of transport that are negatively affected by the city's congestion and as such have limited access to jobs, healthcare, services and leisure facilities and other services. Those in low-income households are less likely to own a car. And those providing them with support are also impacted negatively due to delays and inefficiencies in moving around. The temporary congestion charge is expected to make bus services, walking and cycling more attractive as alternatives to the car.

County officers have had detailed discussions with city officers about how permits will be available to allow officers providing services to housing tenants to drive cars through congestion charge locations for free. We believe that as such, the proposals will enhance how city residents who need help most will receive it, even in the central permit area in the city centre.

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.

There is a permit for unpaid carers to drive through congestion charge locations for free to allow them to continue this important work unhindered.

County officers have been in discussion with city council colleagues and users of the ice rink about the potential impact of the proposals on access to ice dance and hockey activities. As a result, it is recommended that a permit giving free access through the congestion charge locations be provided for all those who are part of an ice rink club or programme.

Given that more than 90% of visitors to the city centre do so not by car, we believe the proposals will enhance access overall by making buses (including Park & Ride) quicker and more reliable and walking and cycling safer and more attractive. In any

case many of Westgate car park visitors come from Oxford or at least Oxfordshire and as such will be able to apply for a permit giving day passes to travel through the congestion charge locations and therefore to the Westgate car park for free.

Contractors and deliveries are mostly undertaken using vans and lorries – this are exempt from the charge and would benefit from quicker and more reliable journeys to their destinations. There are permits proposed to allow cars to be used as goods vehicles for business.

Tackling the negative effects of tourist coaches is out of scope of this proposal but is being actively considered by the county council.

The recommendations include a commitment to using congestion charge revenue to make Park & Ride bus tickets free for the pre-Christmas period. Extending this financial support would be subject to review of charge income and expenditure.

### **Oxford Health NHS Trust**

The Oxford Health NHS Foundation Trust has expressed its support for the proposed Oxford temporary congestion charge for cars, recognizing its potential benefits in reducing air pollution, traffic, and improving bus journey times. However, the Trust has raised concerns about the potential financial burden on its staff who rely on personal vehicles for commuting. The Trust has requested the Oxfordshire County Council to consider measures to mitigate these challenges, including issuing permits for work-related vehicle use and improving public transport options.

- The congestion charge may impose additional financial burdens on staff, potentially affecting staff retention, recruitment, morale, and daily routines.
- Issue permits for staff who need to use vehicles for work purposes, covering both commuting and work-related trips.
- Improved Public Transport: Ensure staff have access to reliable and affordable public transport as an alternative to personal vehicles.
- The Trust is eager to work with the council to find solutions that balance environmental goals with the practical needs of healthcare workers.
- The Trust believes that thoughtful planning and cooperation can achieve the shared objective of a healthier, cleaner Oxford without compromising the wellbeing of healthcare workers.

### ***Response***

Staff and patients will always be able to drive their car to the Oxford Health sites without driving through a congestion charge point. In many cases, they will not even need to take a different route compared to the one they are using at the moment. For others, the diversion will be small as part of their overall journey – especially the very many people to start their journey from outside of the city.

The community health and care worker permit will allow staff to drive through the charge points for free when visiting multiple locations to care for patients on the same day.

Bus services serving Oxford Health sites are expected to improve, becoming quicker and more reliable. Where possible, congestion charge revenue can be used to enhance further existing services and suggestions for how this could work, are welcomed.

### **Oxford Pedestrians Association**

The Oxford Pedestrians Association (OxPA) supports the Council's congestion charging proposals. The proposals are expected to benefit walking and wheeling by reducing traffic and air pollution, making streets more attractive and safer, and improving bus service reliability. OxPA believes that the proposals align with the Local Transport and Connectivity Plan (LTCP) adopted by the Council in 2022, which prioritises walking, cycling, and public transport over private car use. The implementation of these proposals will also provide additional funding for transport improvements in Oxford.

### **Oxfordshire Mental Health Partnership**

The Oxfordshire Mental Health Partnership response requests that the exemption currently applied to NHS health and social care workers be extended to voluntary sector staff delivering similar functions. The organizations argue that their services are essential and that the proposed congestion charges would negatively impact their ability to provide support to vulnerable individuals in the community.

### *Response*

People working for the Oxfordshire Mental Health Partnership in either a paid or unpaid capacity would be eligible to apply for the community health or care worker permit if their work involves visiting patients at multiple locations across Oxford on the same day.

### **Oxford University Hospitals NHS Trust**

Oxford University Hospitals NHS Foundation Trust (OUH) acknowledges the aims of the proposed congestion charge but raises several operational, accessibility, and equity concerns. The Trust highlights the potential impact on patients, visitors, and staff—particularly those commuting from outside Oxford or delivering clinical services across sites. OUH requests clear signage, simplified permit processes, and investment in direct public transport links to mitigate disruption. The Trust also

emphasises the importance of protecting vulnerable groups and maintaining service continuity, while aligning with its own net-zero commitments under the Health and Care Act 2022.

### *Response*

Staff and patients will always be able to drive their car to the OUH sites without driving through a congestion charge point. In many cases, they will not even need to take a different route compared to the one they are using at the moment. For others, the diversion will be small as part of their overall journey – especially the very many people to start their journey from outside of the city.

The community health and care worker permit will allow staff to drive through the charge points for free when visiting multiple locations to care for patients in one day.

There will be clear, DfT approved advanced warning signage installed as part of the scheme if it is approved and the permit application process will be as simple and efficient as possible. Regular liaison between county and OUH during the permit application period ahead of the scheme start will be encouraged.

### **Oxon4Buses**

Oxon4Buses expresses strong support for the proposed temporary congestion charge. The group views the measure as a necessary step toward improving Oxford's bus services, which are vital for low-income residents, disabled individuals, and those with health conditions. They advocate for the scheme to be implemented as part of a broader transformation of Oxford's transport system, with fairness and social justice at its core.

### **POETS (Planning Oxfordshire's Environment and Transport Sustainably)**

POETS supports the county council's objective and the principle of an experimental congestion charge, despite some concerns about the proposed charging locations and exemptions.

- The proposed charging locations are not ideal for a fully effective congestion charge scheme.
- There are concerns about the scale and complexity of the proposed exemptions.
- POETS recommends a comprehensive publicity campaign to explain the scheme's purpose and ensure road users understand how it will operate.
- Financial incentives should be introduced to encourage the use of local buses and park & ride services.

- Consideration should be given to introducing new and/or additional bus services simultaneously.

### *Response*

The modelling report sets out how overall, the six congestion charging locations are expected to reduce traffic across the city – by on average 15-20% in inner Oxford and in outer areas between 2 and 5%. Actual outcomes will of course be monitored including when the traffic filter trial begins.

A widespread publicity campaign will be launched if the congestion charging proposals are approved – this will include making people aware of what permits are available and how to apply for them.

Use of the charging revenue to incentivise the use of improved public transport including Park & Ride is being actively considered.

### **River Learning Trust**

River Learning Trust (RLT) expresses strong opposition to the proposed congestion charge, citing serious concerns about its impact on staff recruitment and retention across several schools in Oxford. While supportive of the Council's environmental goals and efforts to reduce car journeys, RLT warns that the charge could undermine the ability of schools to deliver inclusive, high-quality education—particularly in areas served by Marston Ferry Road. The Trust urges Oxfordshire County Council to reconsider the proposal or identify alternative solutions that do not compromise educational outcomes for Oxford families.

- Four RLT schools—The Cherwell School, The Swan School, New Marston Primary School, and Meadowbrook College—are located near Marston Ferry Road, a proposed congestion charge point.
- These schools serve diverse and vulnerable student populations, including those with SEND needs, English as an additional language, and those requiring alternative provision.
- Oxford's high housing costs already make staff recruitment challenging.
- RLT warns that congestion charges could further deter staff from joining or staying at these schools.
- Despite efforts to reduce car journeys, some staff must drive due to personal circumstances or lack of viable alternatives.
- RLT urges the Council to explore options that achieve environmental goals without compromising education.

### *Response*

No staff at any of these schools mentioned would have to drive through a congestion charging point to get to work if the proposals are approved. Staff from outside of the city may not even have to take a different route to the one they use now and those that do would most likely only need to make a small adjustment to their route – in relation to the overall journey length.

Non car alternatives will be improved following the introduction of the temporary congestion charge – buses (including park & ride) will be quicker and more reliable and walking and cycling safer and more attractive.

SEND pupils can apply for a permit to allow them to be driven to school through the congestion charge points for free.

### **ROX (Rescue Oxford)**

The letter addresses concerns regarding the proposed congestion charge in Oxford. It highlights the potential bureaucratic challenges, the impact on businesses, and the need for clear communication to residents and visitors. The letter also questions the logic behind the proposed traffic filter sites and suggests alternative strategies to reduce congestion without harming the local economy.

### *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, 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 on 100 days and 25 days a year respectively.

Publicity campaigns will be invoked if the proposals are approved to ensure people are aware of how to apply for these and the many other permits to drive through charging points for free.

Mobile traders will benefit from the reduced congestion given that vans are exempt and sole traders can apply to use their car 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 that accompanies the consultation documentation.

### **St Thomas' Day Nursery**



St Thomas' Day Nursery expresses concern about the financial and operational impact of the proposed congestion charge on its staff and clientele. The nursery highlights the impracticality of public transport for staff with childcare responsibilities and questions the eligibility and process for business exemption permits. It warns that the charge may make access unaffordable for parents, threatening the nursery's sustainability. The nursery requests clarification on exemptions and seeks a resolution that supports continued access for staff and families.

### *Response*

Any nursery staff driving to work to use on site car parking will be able to apply for a permit to drive for free through the congestion charge locations. Parents driving to drop their children off at the nursery will need to pay £5 daily charge or use one of their 100 day passes if they live in Oxford and apply for the resident's permit.

The nursery is located close to a number of frequent bus services that serve the city centre which are expected to improve following the start of the temporary congestion charging scheme if approved. Cycling and walking their children to nursery should also become a more attractive alternative to driving and paying the £5 daily charge.

If the temporary congestion charge proposals are approved by Cabinet, officers will approach St Thomas Nursery (and any other nurseries that are in the central permit area) to better understand how many parents of current pupils drive to drop off/pick up each day and therefore the impact that the introduction of the temporary congestion charge might have on access. This information would be used to establish whether any further mitigation is required to address this impact.

### **South Oxfordshire District Council**

South Oxfordshire District Council's response expresses support for the proposal's goals to reduce traffic, improve bus services, and promote safer walking and cycling. However, the council has raised several concerns about the scheme's design and implementation. These concerns include the distribution and quantity of permits (it queries why Oxford residents can apply for more day passes when they should be able to switch to non-car alternatives more easily), the rationale for permit area boundaries, exemptions for commercial vehicles, the impact on the ring road and through traffic, and the need for effective signage and enforcement. The council suggests improvements such as charging for permits to reduce abuse, imposing time restrictions for commercial vehicle access, and providing advance warning signage to ensure effective operation and compliance.

A query was raised about how future walking and cycling trips are estimated in the modelling.

## *Response*

Oxford residents would be able to apply for more day passes than those living outside of the city because the impact of the congestion charging points would have a more significant impact on their journeys. The further people live from the charging points, the less likely it would be that they need to divert to avoid a charging point or if they do, that diversion would be much less significant as a part of the whole journey.

Larger, commercial vehicles would be exempt from the congestion charge because they are generally used to transport heavy or bulky goods or tools, and as a rule it's more difficult and in many cases impossible to do this using alternative means such as public transport or even cargo bikes. Commercial vehicles often make multiple stops in different parts of the city (e.g. tradespeople visiting several properties, or distribution companies delivering to multiple addresses).

If commercial vehicles were not exempt, it's likely some would arrive at charging locations and then need to u-turn to avoid paying the charge. This would lead to additional safety risks for other road users – particularly pedestrians and cyclists – if large vehicles were to u-turn in significant numbers. (The charging locations have been positioned and designed to accommodate turning cars safely, and advance signage will be in place to minimise the number of cars needing to turn).

Exemptions for vans and HGVs would also limit the amount of traffic displaced to the ring road and A34.

The modelling work undertaken for the congestion charge proposals show that the impact of displaced traffic on the ring road would be less than with the traffic filters and so in relation to concerns about air quality and the impact on Oxford Meadows special area of conservation, this would be acceptable.

The method for estimating transfers to walking and cycling is the same as was used in the Transport and Traffic forecasting report published for the ETRO traffic filter proposals.

Charging for permits to allow free travel through the charging locations would seem counter intuitive although we will be monitoring the operation of the permit system more generally to identify clear signs of abuse.

Clear advance warning signs for the charging locations is an integral part of the proposals to avoid unnecessary journeys as far as the charging locations. We are also working with satellite navigation platform operators to ensure this new information is included in their software from day one, if approved.

## **Summertown & St. Margaret's Neighbourhood Forum**

The Summertown & St Margaret's Neighbourhood Forum supports the introduction of a Temporary Congestion Charge in Oxford City Centre, aligning with the transport

policies outlined in their Neighbourhood Plan. The Forum believes the measure will help reduce traffic and improve public transport, particularly bus services. However, they express reservations about the Marston Ferry Road charge point, citing the need for further analysis. They also recommend complementary improvements to bus infrastructure, such as a universal tap-on/tap-off system, to maximise the scheme's effectiveness.

The forum recommends limiting the scheme to City Centre locations until further analysis is conducted.

### *Response*

The modelling report that accompanies the proposals during the consultation demonstrates that the Marston Ferry Road congestion charging point works together with the other five points to reduce traffic across the city overall and specifically in areas where delays are experienced by buses in the vicinity i.e. Banbury Road/Marston Ferry Road and Cherwell Drive/Marsh Lane junctions.

The Marston Ferry Road congestion charging point would only operate 7-9am and 3-6pm Monday to Saturday if the proposals are approved.

## **Thames Valley Police**

Thames Valley Police acknowledges the inclusion of "Police Vehicle on Patrol" as an exemption under the proposed congestion charge scheme, which is essential for operational continuity. However, the response expresses scepticism about the necessity and design of the restrictions, particularly the impact on driver behaviour and road safety. Key concerns include signage clarity, space for manoeuvring, and the ability to suspend restrictions during spontaneous incidents. The Police also request assurance on advance signage and continued coordination with ANPR enforcement.

### *Response*

The modelling report included with the consultation demonstrates that the congestion charging locations work together to reduce traffic overall and make journeys by exempt vehicles (such as police patrol) and those with permits quicker and more reliable.

The charging locations have been carefully design following best practice and have been through the road safety audit process. Clearly, how they operate in practice will be monitored carefully including watching out for any unexpected safety concerns. There will be DfT approved advanced warning signage to discourage vehicles that aren't exempt or without a permit from getting as far as a charging point and then turning around to avoid paying the charge.

The police will be able to direct the local highway authority to suspend the congestion charging points in severe emergency situations.

## **UBER**

Uber Ltd expresses strong support for the Oxford temporary congestion charge initiative, particularly its goal of reducing traffic and improving public transport, cycling, and walking conditions. The company welcomes the exemption for Hackney Carriages (HCs) and Private Hire Vehicles (PHVs), recognising their role in providing accessible, flexible transport—especially during off-peak hours. Uber also highlights the importance of a streamlined registration process for PHV exemptions to ensure operational continuity and driver compliance.

## **Vale of White Horse District Council**

The Vale of White Horse District Council supports the objectives of the Temporary Congestion Charge proposal but has several concerns and issues. They are worried about the permit distribution, as the number of permits for Oxford residents is higher than for those in the Oxfordshire Permit Area, which may reduce the effectiveness of the charge and promote higher car ownership among Oxford residents. The council also has concerns about the exemptions for LGVs, HGVs, and commercial vehicles, as allowing these vehicles through the Congestion Charge filters may improve journey times for through traffic but could intimidate vulnerable road users. Additionally, the council is concerned about the potential increase in traffic flow on the ring road and key roads leading to and from it, which could worsen journey experiences for pedestrians, cyclists, and buses. Finally, the council highlights the lack of details on advance notices for drivers to prevent through traffic, which could lead to increased traffic in central Oxford.

## ***Response***

See response to South Oxfordshire District Council's submission.