# Summary of key points raised by the Statutory Stakeholders and other selected stakeholder groups

This annex is a summary of responses received from stakeholder groups during the consultation in September and October 2022. This feedback has led to some of the changes to the proposals e.g., extension of the resident day pass scheme to outside of the city and delay to the start of the trial.

# **Statutory stakeholders:**

# Oxfordshire County Council Fire & Rescue Service

The fire service is confident that it can continue to operate without a major impact given the exemptions and permits available.

# Road Haulage Association (RHA)

The RHA acknowledges the benefits of the traffic filters and supports the direction of travel. The RHA is grateful for the changes to the scheme considering the complexities that the filters would have brought for commercial vehicles making deliveries

# Logistics UK (LUK)

LUK strongly welcomes recognition of the essential role of freight by including HGVs and vans as being exempt from the traffic filters.

# South Central Ambulance Service (SCAS)

SCAS is broadly supportive of the proposals with management of filter points by ANPR cameras.

#### National Highways (NH)

NH has given its 'in principle' support for the traffic filters scheme but wants to discuss its concerns further. This discussion will include the development and agreement of a comprehensive Management & Monitoring Strategy (M&MS), which could make provision for the potential temporary suspension of one or more of the traffic filters if the impact on the strategic road network is considered detrimental to operational safety. NH says that the M&MS would need to be in place by the time the trial starts. The Hythe Bridge Street and Thames Street filters are considered by NH to be the ones that have the greatest potential for creating adverse impacts on the A34.

# Oxford Bus Company and Stagecoach (joint letter)

The operators strongly support the traffic filters and view them necessary to achieve the objectives of the Central Oxfordshire Travel Plan (COTP). They support exemptions for essential commercial traffic and disabled people but not the broad

exemptions for residents. Rigorous monitoring of the take up and use of exemptions is needed.

Traffic filters on their own will not be sufficient to achieve 10% target for bus speed improvement required for ZEBRA investment – additional measures will be needed. Woodstock Road approaching Wolvercote roundabout, Headley Way and London Road are the areas of most concern. Suggestions are made for where bus priority should be considered.

The filters should not be implemented until rail station construction works and closure of Botley Road are completed.

To help deliver bus journey time improvements ahead of the full traffic filter trial, temporary measures should be considered.

Very careful monitoring of traffic changes and bus journey times during the trial will be needed.

## **Arriva bus company**

Arriva supports the proposals to provide faster and more consistent bus journey times. It recognises the importance of disincentivising private car journeys alongside promoting public transport and active travel and believes the car permits should only be for access rather than through trips. In terms of monitoring, Arriva thinks there should be a metric to measure the consistency of bus journey times linked to Enhanced Partnership targets i.e. variance between peak and off-peak journey times).

# Oxford Schools Bus Partnership (OSBP)

OSBP supports the Trial Traffic Filters proposals in principle as journey time and reliability of bus services should noticeably improve, but the potential impact on routes to which traffic is displaced is a concern.

OSBP buses must be exempt from the trial filters to benefit from the reduction in congestion.

#### Other stakeholders:

# Natural England

A response had not been received at the time of writing. The response will be reported verbally.

## Thames Valley Police (TVP)

TVP has concerns about enforcement of the filters which they must not be responsible for. Adequate clear and understandable advanced signage will be needed to avoid confusion and to ensure safe U turning near the filter points. TVP queries whether there will be extra traffic on the ring road which could cause delays in emergency response times

# **Oxford University**

The university states that the proposals are aligned with their aspirations for transport. The University's Environmental Sustainability Subcommittee supports the piloting of the proposed experimental traffic filters (with the listed exemptions which are important to the University). The university is keen to work with the council on the details of the scheme and welcomes from an operational point of view some of the proposed new exemptions including – vans, Blue Badge holders and disabled tax class vehicles, businesses within the permit area using a private car as a goods vehicle.

The university is concerned that public transport remains unaffordable for its lowest paid workers and unattractive and unreliable for their staff. The trial will need to demonstrate that the filters result in an affordable, attractive and reliable bus network.

# Oxford Brookes University (OBU)

OBU in general supports the council's aspirations to promote sustainable and low carbon modes of transport and wants to work with the council to develop the plans. It welcomes the addition of the residents' day passes. and queries whether OBU operational vehicles are allowed through filters. The importance of catering for people travelling to Oxford from outlying areas was stressed.

OBU wishes to see specific improvements for cyclists and pedestrians as part of the trial.

#### Colleges of Oxford University

Concerns were expressed about the filters creating difficulties for staff needing to drive to colleges – extra distance, time and fuel costs. This is particularly for staff who have to live outside of the city and therefore have difficult public transport journeys if they can't drive because of the filters. The need for cheaper bus fares and segregated cycle lanes were raised. A suggestion to make the filters only operate at peak times was made.

Many college staff start early or finish late when bus services aren't available. Staff often need to visit multiple college sites across the city. Queries are raised about how students can drop off and pick up bulky belongings at the start and end of terms.

#### Businesses

There is a lot of concern about the negative impact the proposals will have on business because of making it difficult for staff, customers and deliveries to reach them. Many are worried that shops and businesses will close because of this. Some respondents do not think that congestion is bad enough to justify the changes that people will have to make to how they travel. Others think that the filters will worsen the congestion created by low traffic neighbourhoods. Businesses are concerned that the traffic filters will displace congestion and pollution onto other areas and routes. The filters will add time and cost to journeys that people need to make for business purposes.

Some businesses do not think these proposals are needed but other interventions should be considered

Many business-related journeys need to be made by car because they need to carry bulky items. Or customers can't catch the bus or walk or cycle because they're elderly or there isn't a suitable bus service. It is requested by some that the permit area is extended outside of the city for businesses to use cars as goods vehicles because they need to travel into the city from outside.

# Westgate Oxford Alliance (WOA)

WOA supports the general principles of the proposal but has some concerns about the measures:

Can Botley Road satisfactorily accommodate all the cars driving to the Westgate car park given that it already experiences congestion – will this result in a negative impact on buses including Park & Ride accessing the city centre?

The proposed timing of the trial to coincide with the closure of Botley Road for rail station improvement works which would mean no vehicular access to the car park. The modelling carried out to support the proposals doesn't go into sufficient detail especially at junctions on the ring road with the A34 and at the car park entrance itself.

#### Oxford University Hospital NHS Trust (OUHT)

The OUHT understands the rationale for the six proposed traffic filters but has some concerns; further engagement is needed to understand the potential impact on patients, visitors and staff.

#### Schools

Concern is expressed about the difficulties for staff accessing school sites by car which many need to do due to living outside of the city boundary = and needing to carry large amounts of paperwork/marking/equipment. Exemptions/permits for school staff and parents transporting very young children were requested. Many respondents feel that the proposals will negatively impact on recruitment and retention of staff.

Some schools offer specialist teaching e.g. music, and parents sending their children to these schools can't simply chose another school. It is felt to be difficult to get very young children to school by bike or on the bus. Better and cheaper bus services and more segregated cycle lanes are needed.

Concerns were raised about safeguarding and health and safety for children who may be required to cycle or catch the bus to school because of longer journeys to school by car due to the detours needed to avoid filters.

# GPs and other healthcare practitioners

Feedback received suggested that healthcare professionals based at GPs and healthcare centres should be given permits to drive through filters. Permits should be available for patients needing to drive to surgeries and health centres if they live outside the permit area. Particular concern is if GPs/healthcare centres need to travel through a filter to reach parts of their catchment.

Concern is expressed about recruitment and retention of healthcare staff. There is concern that the proposals will exacerbate health inequalities and disadvantage less well-off people and people in most vulnerable groups, particularly in areas less well served by public transport.

Some recognise the health benefits that encouraging more non car travel will realise.

# Places of Worship

Buses often don't run early enough for Sunday morning services. Many people attending church are older and find walking, cycling and catching the bus difficult, but don't qualify for a Blue Badge. The proposals may put people off from attending and volunteering to help with the running of places of worship.

Could clergy be allowed a car permit to carry out pastoral visits? Often a number need to be made each day. The council needs to monitor the impact of the scheme on places of worship.

Some places of worship are the only one of a particular denomination in a very large area so people can't simply choose another place of worship to avoid a longer car journey around the filter points.

# Layla Moran MP

Ms Moran supports the objectives of the scheme but expresses concern at the unfairness of people living outside of but near to the city not being offered day passes for driving through the filters. It seems unfair to offer day passes to residents of the city who will benefit most from the proposals including plentiful options for improved travel by public transport.

Concern is expressed about the negative safety impact of allowing HGVs to drive through the filters. Time restrictions should be considered for HGVs. The justification

for allowing vans to drive through filters is unclear. This could lead to people buying vans to allow them to continue driving in the city on a day-to-day basis.

Car club vehicles should be given permits to drive through filters.

Bus service improvements for residents in and out of the city need to be spelt out more clearly. Reducing fares should also be an aim of the scheme.

Specific concerns are raised about the possible negative impact of the proposals on the Botley Road and the A34. The former because of the location of the Thames Street filter and the latter because of the possible displacement of traffic and pollution onto the A34 if people continue to drive to avoid the filters.

#### **Elected Councillors**

Need to hold more public meetings about the proposals. Car permits should be available to people living in areas outside of but close to the city, particularly those that don't have good bus services. Some are concerned that there are too many exemptions (including vans and HGVs for example) and too many permits would be given for residents to drive through the filters.

Concerns about the possibility of extra traffic and pollution on Botley Road and A34. Generally, there is a concern about the limited amount of modelling of the proposals.

Concern is expressed about the impact of the proposals on the city's economy. Also on more elderly people who have less ability to switch modes including using buses, walking and cycling.

Concern about how the proposals will affect people with disabilities and temporary disablement.

The proposals will make it difficult for elected members to access County Hall, negatively impacting on their work on behalf of constituents.

The new and existing traffic filters should have the same rules about who/what can drive through.

It is suggested that HGVs should only be allowed in the city and to drive through filters if they have adequate safety measures in place.

It is suggested car club cars should have permits to drive through the filters.

Improving the communication about the proposals is important.

Lots of suggestions for how and what to monitor if the trial goes ahead. Monitoring should be extended to roads and settlements outside of the city – there is concern that congestion and pollution will be displaced to these areas.

#### **District Councils**

**Oxford City Council** commented on the traffic filters proposal as part of its response to the Central Oxfordshire Travel Plan. The city council supports the traffic filters in principle but would like to see more detailed evidence from modelling outputs about their impact. It acknowledges that the filters would be introduced by an ETRO which ensures further consultation and monitoring before them being made permanent.

**South Oxfordshire District Council** supports the intended outcomes of the filters but has some concerns about the scheme details. These include the proposed allocation of permits for Oxford residents but not those living outside of but close to the city who have fewer options for non-car travel. Oxford residents have/will have more options to not travel by car so offering permits will mean many will continue to drive. It is suggested that key workers in the district should be given permits. The boundary of the permit area is queried – why are some South Oxfordshire settlements close to the city not included?

Allowing HGVs through the filters could encourage such vehicles to drive through the city rather than around it. Could HGVs be allowed in the city only at certain times?

The proposals do not give enough consideration to improving bus services that benefit residents of the district.

Vale of White Horse District Council (VoWHDC) supports the intended outcomes of the filters but has some concerns about the scheme details. These include the fact that most Vale of White Horse residents would not have access to resident day passes. VoWHDC considers that many rural residents have long and slow journeys to Oxford and are not as able to switch to bus and walking and cycling as Oxford residents who are being allowed day passes. In the interest of fairness, VoWHDC residents who need to access Oxford – key workers are mentioned – should be allowed day passes.

Concern is expressed about HGVs and vans being allowed through the filters which may lead to those vehicles taking short cuts through the city to avoid congestion.

Improvements to buses because of the filters does not appear to sufficiently benefit VoWHDC residents.

Concerns raised about the impact of the scheme on air pollution levels particularly in Botley. Also the impact of traffic on A420 and A34.

**Cherwell District Council** (CDC) broadly supports – with some reservations and suggestions – the trial of the traffic filters. It is suggested that the permit system should include new housing to the north of Cutteslowe along the A4165 and possibly some residents and businesses in Kidlington and Yarnton.

The council is concerned that without suitable attractive alternatives for journeys through filter points, people will travel further in their cars. It raises a variety of detailed issues relating to the effective monitoring of the success or otherwise of the trial. CDC would welcome regular discussions during the trial about any adjustment

and mitigation that is needed. Access to the John Radcliffe hospital for Cherwell residents is flagged as an issue that may need addressing.

#### "Concerned Residents" Petition

A petition signed by 3,210 citizens opposing proposals for two of the six proposed trial filters will be submitted to Cabinet by this group. This petition specifically opposes the Marston Ferry Road & Hollow Way filters. They are considered to disproportionately discriminate against elderly, vulnerable, pregnant, and disabled individuals. The petition claims the County Council has not adequately made the case for traffic filters on key connecting roads outside of Oxford city centre.

# County and City Councillor Susanna Pressel and City Councillor Lois Muddiman Petition

1842 people signed a petition raising concerns that the Thames Street filter would require all traffic to the Westgate car park, Osney Mead, the new Oxpens development and the train station to use Botley Road. It called on the county council to change the plans, so this traffic is directed elsewhere.

# YouGov survey commissioned by Oxfordshire Liveable Streets (OLS)

During the consultation period, OLS commissioned research by YouGov to ascertain views of Oxford residents about traffic filters. 249 people were asked the following question:

"Six new 'traffic filters' are being considered which are designed to reduce traffic levels across Oxford, making bus journeys quicker and walking and cycling safer. When they are operating, most private cars will not be allowed through without a permit. All other vehicles including buses and emergency services will be allowed at all times. Having read the above, would you support or oppose such a measure?"

In response, 60% supported and 31% opposed the measure.