

Annex 4 - Oxford Business Action Group (OBAG) officer response

Purpose

1. This annex responds to key themes from the consultation response submitted by Oxford Business Action Group (OBAG). This officer response largely uses the 'headings' in the OBAG's submitted response '*OBAG Response_Oxford temporary congestion charge for cars consultation*' (in Annex 20) and should be read in conjunction with that document.

Severe economic risk

2. The county council has NOT acknowledged a drop in trade of 10%. It is not clear where this figure has come from. In fact, OCC's evidence is that after the pedestrianisation of the city centre, including the implementation of the High Street bus gate, traffic reduced by just under 20% on the edge of the city centre but footfall increased by around 10% in the city centre. Bus use increased from 27% to 48% for trips to city centre following the introduction of the High Street bus gate. It is believed that OBAG consider that if 10% of people currently access the city centre by car, then this will directly translate into a 10% reduction in spend, which will clearly not be the case. It is the county council's view that by improving access by non-car modes (90% of those accessing the city centre), this will enhance access to the city centre, rather than hinder it.
3. OBAG, and Open Roads for Oxford Ltd, seem to want to prioritise the 10% of people in the city centre who have arrived by car, perhaps because they believe they will spend more than others. Given the proposals for residential day passes, a proportion of the 10% would not need to pay any potential congestion charge when driving into the city centre. Focussing on low frequency, high value visitors does not seem like the best strategy for Oxford.
4. City centre viability does not depend entirely on access. It is about ensuring people stay in the city centre for as long as possible. By providing cheap, quick and convenient public transport, people will have comfort that they can stay in the city centre all day without incurring additional parking charges by the hour. This is the fairest system to ensure that all visitors, regardless of wealth, can enjoy visiting Oxford.
5. Even if we were to focus our efforts on the 10% of car-borne customers, there is not the car parking capacity in the city centre to satisfy an increase in demand. Congestion on the Abingdon Road, and elsewhere, is created partly by the Westgate car park being over capacity. However, there is capacity at the park and ride and on buses. By making buses and park and ride cheaper, more reliable and more attractive, we would hope to increase visitors to the city centre for the benefit of all businesses, not just those that cater to low frequency, high value customers.

Workforce disruption

6. Oxford has an incredibly good public transport network. This is demonstrated by the fact that around 14.5% of journeys to work in Oxford are made by bus (excluding P&R) and this figure is much higher for the city centre. However, bus journeys are slow and unreliable due to congestion. By making buses run to the speed limit and to timetable, buses will become more attractive to new and existing users - 30% of people in Oxford do not own a car. Many residents of Oxford and Oxfordshire rely on the bus network to access employment, education, retail and services. By retaining the status quo, the county council would not be serving this specific section of society. It would lead to ever more unreliable bus services and even more service cuts, leaving them in a worse position. Additionally, the income from the congestion charge will be used to make buses cheaper by significantly discounting them or making them free. This would also include the bus journey element of P&R. This could essentially mean a free shuttle bus to the city centre and other key areas such as the hospitals in Headington (subject to sufficient income from the congestion charge).
7. It should be noted that with the exception of part of the city centre, most areas of the city will be accessible without passing a congestion charge point. However, it is proposed to allow unlimited day passes for residents (including 50 visitor permits for each household in the central permit area) and commuters with parking provided on site by their employer in the central permit area to mitigate this impact.
8. The county council does not expect everybody to switch modes but it is hoped that if enough people make small changes to their daily travel habits, everybody will benefit from reduced congestion.

Insufficient evidence and consultation

9. The county council has published an evidence base reflecting the broad impacts of the proposals, proportionate for decision-making. 63,444 people viewed the project landing page on the Let's Talk Oxfordshire portal. 4,657 people downloaded at least one of the accompanying documents and 2,281 people read frequently asked questions. 17,489 people visited the survey itself and 7,140 people completed the survey online.
10. The county council has published its measures of success and agreed to monitor the scheme very carefully and take appropriate action wherever necessary. It has published data on where traffic flows are expected to increase, and the county council has never indicated it can remove all congestion. However, the evidence suggests that on key bus, walking and cycling routes, conditions should improve for those modes – the majority of trips in and around the city.

Absence of safeguards

11. The county council does not acknowledge a “3 to 6 month period of disruption whilst ‘modal shift’ occurs”. Whilst early teething problems are possible with any new project (whether that be a new road scheme, bus lane or new junction arrangement), the county council does not expect 3 to 6 months of disruption and business impacts. As discussed above, by prioritising 90% of visitors to the city centre by providing faster, cheaper and more reliable public transport and better conditions for walking and cycling, this will enhance access for 90% of people. Whilst mode shift is clearly expected, it will only enhance the options already available. Even those that choose to drive, a good proportion will have day passes or exemptions. So, even for the current 10%, they may also find their journey is improved. The county council intends to provide significantly discounted or possibly even free bus travel from the park and rides. The level of exemptions and day passes proposed are generally not available in other congestion charge schemes.
12. Furthermore, congestion costs the UK economy £30.8 billion a year (2016 prices). This is an average cost of £968 per driver per year, and includes direct costs like wasted time and fuel and indirect costs to businesses, such as increased prices through delays in production. By 2030 the cumulative cost of congestion will exceed £300 billion. Clearly traffic growth has the potential to inhibit economic growth and stall productivity improvements if not managed effectively.
https://www.local.gov.uk/sites/default/files/documents/5.16%20Congestion_report_v03.pdf#:~:text=Inrix%20estimates%20that%20congestion%20costs%20the%20UK%20economy,such%20as%20increased%20prices%20through%20delays%20in%20production.6)
13. As the congestion charge would only apply to cars, city businesses will be supported. They should reap the benefits of improvements in their supply chains and being located in the city. . This will also apply to those businesses that rely on moving around the city for work for example, tradespeople, healthcare and care workers (professional and voluntary), mobile hairdressers and driving instructors to name just a few, who will have full exemptions.
14. Change always generates nervousness which is only natural. However, the county council is unequivocal in its view that doing nothing is not an option. If we want to provide the high-quality bus services that everybody says they want, and the environment to encourage many more to walk and cycle, we need to implement policies to prioritise these modes. This is not anti-car, but pro-bus, pro-walking and pro-cycling – the majority of trips across the city are made by these modes. Prioritising the private car is unsustainable and creates too much congestion which is widely seen as detrimental to city life.

OBAG calls for four minimum conditions:

- i. Postponement of implementation until after the 2025 Christmas trading period.

If approved, officers recommend that the scheme should be implemented as soon as possible.. As has been stressed, prioritising the majority of visitors is expected to help footfall and retailers whilst providing access for those essential car users. If approved, it is proposed to make buses from park and ride sites free in the run-up and during the busy Christmas period. This will further enhance Oxford as a visitor destination especially if the buses are not stuck in congestion.

- ii. Clear, published thresholds for economic harm that will trigger review or withdrawal.

If approved, the county council will continually monitor the scheme until the introduction of the traffic filters trial. Thresholds of failure have not been developed because if the county council thought that the scheme would fail, it would not be introduced. The scheme will be monitored on a number of fronts. Basing a scheme's success or failure on one metric, over a short period of time, would not be prudent.

- iii. A funded mitigation and support package for affected businesses.

See answers to (1) and (2). The income from the temporary congestion charge, if approved, will be spent on making public transport quicker, cheaper and more reliable to help people switch to sustainable modes and retain Oxford as a thriving visitor and retail destination. By law, the net proceeds from the congestion charge, can only be spent on the aims of the transport strategy. Therefore, it cannot be spent on a support package for businesses.

- iv. Transparent mechanisms for collecting and responding to business feedback. A monitoring plan has been published with the Cabinet report.