A missed target: Why Oxfordshire County Council's congestion charge proposals will not ease congestion in Oxford

Reconnecting Oxford

3 August 2025

Report overview

1. This report sets out why we believe Oxfordshire County Council's proposed congestion charge for Oxford should not be introduced. We believe the proposal is deeply irrational, both in its own right and also because it is highly unlikely to meet its objectives. Conversely, we predict the scheme will cause considerable inconvenience, distress or harm to Oxford's residents and businesses, and visitors to the city – including those accessing Oxford for health services. Addressing each of the proposal's key objectives in turn.

2. **Reducing traffic:** Due to Oxfordshire County Council effectively co-opting an existing policy, and transforming it into a congestion charge, Oxford's residents are facing the introduction of a scheme that is predicted to reduce traffic flows still further on many roads that are currently not busy, by reference to their own pre-pandemic levels, traffic levels across the wider city, or Oxfordshire as a whole. The scheme also creates winners (often already quiet non-residential roads, mostly around the city centre) and losers (mainly in the outer suburbs). We discuss these issues in chapters 1 and 2.

3. **Making bus services faster and more reliable:** The council has failed to articulate how the scheme will make bus journeys faster and more reliable, especially on a city-wide basis. We note, for example, that at least two of the proposed six congestion charge roads currently carry no buses, and two more – neither of which are congested – have few bus services. We have calculated that, in a typical hour, barely a quarter of all buses pass through a proposed congestion charge site. We also note there are no congestion charge proposals for Headington, a location that is both a major bus route and also a source of significant hospital-derived local congestion. We introduce this topic in chapter 1, and expand on it in chapters 3 – 5.

4. Making buses faster and more reliable requires a reduction in congestion. However, several specific roads where the congestion charge is planned are demonstrably not congested, either at all, or by reference to the congestion charge's proposed times of congestion. We also note that several key roads in outer Oxford are predicted to get busier and fractionally more polluted as a direct result of this scheme being introduced. There is typically no "congestion emergency" on these roads, which requires a radical, immediate policy intervention such as this. We explore these issues further in chapter 1 below.

5. Developing both the traffic and congestion points, this report identifies key causes of both in Oxford. We believe both are caused, to a very significant extent, by a) the city's Headington-based hospitals; b) the city's private schools, on specific roads, at specific times of the year; and, at a highly localised level, the council's own low traffic neighbourhood (LTN) schemes. We believe the council's long-term assumption that much of Oxford's traffic is caused by residents circulating within the city is likely to be wrong and that, consequently, the council's "solution" is likely to be ineffective. We explore this issue further in chapters 3 and 4.

6. We further note the previously unacknowledged potential importance of Google Maps in directing traffic through St Clements, in particular – a problem that can be potentially fixed by far less draconian measures. We explore these issues further in chapter 4.

7. **Allowing for new and improved bus services:** In this report, we set out our ideas for improved bus routes that are directly informed by current congestion hotspots and known route-to-work patterns of commuting. Here, our aim is to identify new bus routes that would clearly benefit those who currently commute into Oxford from outside the city. We make several suggestions to significantly reduce journey times from Oxford's park and rides. We also highlight the need to increase the peak time capacity of such services at Oxford's park and rides, to make bus services a viable alternative to the car for hospital staff, in particular. These proposals are outlined in chapter 4 (our hospitals chapter) and expanded upon in chapter 5 (our bus chapter).

8. **Making walking and cycling safer:** We note the council's failure in its consultation paperwork to articulate how its congestion charge proposals will make cycling and walking safer. Due to time constraints, we do not address this issue further in this report – not least because the evidence we have collected suggests cycling and walking is not a viable (or wanted) option for hospital staff, many of whom live outside the city. However, we believe that, as we articulate above, reducing traffic and congestion in Oxford will make cycling and walking safer.

9. As an aside – but do not develop further in this report – we reiterate a point we have made many times before: for those living in Oxford, its university maintained parks (notably Christ Church Meadow) are a viable, safe and traffic-free alternative to roads, which Oxfordshire County Council systematically refuses to consider as an alternative to its car inhibiting strategies. The council has the legal power to open up new walking routes across private land by creating new footpaths, if it wishes to, and to establish other forms of access by agreement with the landowner. It elects not to.

10. **Reducing local air pollution:** In our "winners and losers" (chapter 2), we discuss which locations are likely to benefit, or not, from the congestion charge, by reference to published projections. Due to time constraints, we do not expand on this issue further in this report, simply noting that a shift from car use to park and ride in Oxford – especially if the buses are electric – has the potential to significantly reduce pollution in the city, especially around Headington.

11. That said, we also have questions about whether the pollution modelling published by Ricardo should be taken at face value, in light of repeated and significant discrepancies between the modelled version of "now" and the real-world, verified version of "now". We explore this issue further in chapter 2, where we also question the traffic modelling.

12. As an aside: We note Oxford already has exceptionally low levels of recorded NO2 pollution. In the city centre, where this scheme will mostly operate, the average recorded pollution levels are barely half the legally permitted maximum, and routinely beat the City Council's own pollution reduction targets. Moreover, with vehicle pollution only responsible for a very small fraction of city centre pollution, we regard Oxfordshire County Council's justification for this scheme on the grounds of pollution reduction as irrational, not to mention disproportionate. We invite the council to independently study Ricardo's recently produced "Source apportionment" survey, which we briefly discuss in chapter 5, to verify our assertions.

Improvements to the health and wellbeing of Oxfordshire's communities:

13. We note that a (separate) 2022 Steer study reported a relatively benign projected impact of Oxfordshire County Council's traffic filters (for which, read congestion charge) proposals. Focusing on the likely impacts on healthcare provision (chapter 4) and Oxford's business community (chapter 6) as a proxy for "the health and wellbeing of our communities", we find that the congestion charge runs a significant risk of being detrimental to both. We also identify specific groups of businesses that may plausibly, and specifically, be adversely affected by the congestion charge proposals. We also believe the council's approach to monitoring the impact of the scheme is sub-optimal, and would benefit from alternative / additional methods of evaluation, which experience tells us is fully achievable.

Summary

14. In light of the above, our central claim is that the congestion charge is highly unlikely to succeed in delivering its stated objectives. More fundamentally, we believe the council misunderstands the nature of congestion in Oxford, and for reasons mainly to do with path dependency, has now proposed a congestion solution that is practically designed not to rectify it. We therefore call for the temporary congestion charge not to be introduced.

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Chapter 1: "Old wine in [ill-suited] new bottles": Oxfordshire County Council's proposed congestion charge

Background

1. On 9 June 2025, barely a month after elections took place at Oxfordshire County Council, the council blindsided many of its own residents with an announcement that the council was considering a "temporary congestion charge among options for traffic improvement"[1]. The same day, Oxford City Council leader Susan Brown responded with a statement saying: "There has been no engagement with businesses, residents or the City Council until today – yet again the city is being done to rather than engaged with in preparing transport proposals. We are concerned that this scheme allows people who can afford to do so to buy access to our streets. Those who can't will struggle.[2]"

2. This is not an unreasonable criticism of a congestion charge – not least because a similar argument was recently made by Oxfordshire County Council itself. At a meeting of Oxfordshire County Council's cabinet held on 29 November 2022, officers recommended against introducing "road user charging" on the grounds that it raised "concerns around fairness of a city-wide road user charging scheme, particularly on low income and other vulnerable groups". And, echoing a point previously made by council[3] officers, it was noted that such a scheme would have "high implementation and administration costs, meant this option was unlikely to be achievable and so was not taken forward." [4]

3. So what has changed since November 2022, to make Oxfordshire Council alter its position on the congestion charge? Here, some context is needed: although the November 2022 cabinet meeting elected not to pursue a congestion charge, the same meeting also agreed to implement a scheme that was practically the same thing: "traffic filters". Foreshadowing congestion charge proposals made two-and-a-half years later, the traffic filter scheme envisaged ANPR checkpoints on six of Oxford's main arterial roads, which effectively banned car drivers from passing these checkpoints without a permit. The locations, and the hours of operation, for the traffic filters scheme were the same as those of the subsequent congestion charge scheme.

4. For reasons best known to itself, in 2022 Oxfordshire County Council voluntarily tied the delivery of the traffic filter scheme to a £82.5 million bid for electric bus funding by Oxford's main bus companies, via a government funding scheme known as ZEBRA. And, to secure bus company support for the bid, Oxfordshire County Council had offered to cut bus journey

[1] Oxfordshire County Council. Oxford temporary congestion charge among options for traffic improvement. 9 June 2025. Available here.
[2] Oxford City Council. Statement on Oxfordshire County Council's proposal for Oxford temporary congestion charge. 9 June 2025. Available here.
[3] Oxfordshire County Council. Oxford Transport Strategy. Available here.
[4] Oxfordshire County Council. Cabinet. Oxford Traffic filters. 29 November 2022. Available here.

times by at least 10%[5]. Half of these efficiency gains were to be yielded by the delivery of the traffic filters scheme. In a recent congestion charge Q&A session on 8 July 2025, Oxfordshire County Council officer Martin Kraftl confirmed in writing that "There are no financial penalties associated with this commitment" – i.e. the £43.7 million[6] the bus companies had invested in electric buses in light of the council's bus journey time improvement assurances.

5. Even before cabinet was due to decide whether to approve the traffic filters scheme, it became mired in controversy. One of the key decision-makers, Duncan Enright, was forced to recuse himself from the approval decision, after being quoted in a newspaper in advance of the meeting saying the traffic filters are "going to happen, definitely"[7]. We understand Mr Enright denies saying this. Separately, the council was also accused of a "cover up", after it was revealed that officers had elected not to release information indicating the scheme would increase on Woodstock Road by 62.4 per cent and Botley Road by 10 per cent[8].

6. In the wider political context, shortly before the traffic filters' consultation took place, Oxfordshire County Council had "lost" several consultations regarding low traffic neighbourhoods in Cowley[9] and East Oxford[10], with residents repeatedly rejecting them by large margins (the council had decided to implement the schemes regardless). Possibly to avoid yet another popular rejection of one of its key traffic measures, the traffic filters consultation survey did not include a "support / oppose" option[11] – thereby making it impossible for those affected to register their disapproval, other than via written comments.

7. At a meeting held on 18 October 2022, in the run up to the traffic filters decision, a report from the council's corporate director for environment and place noted that: "It is a requirement that the bus operators place orders for buses by December 2022 as orders made after this date will mean a significant increase in costs. Oxfordshire County Council therefore needs to agree payment terms and key milestones with bus operators to ensure the project's timely delivery and the release of funds at appropriate points and ensure the funding conditions set out by the DfT are met. These provisions will be covered through legally binding funding agreements with the operators."12

8. To meet this December 2022 deadline for getting a good price for the electric buses, there therefore followed what might euphemistically be described as a compressed consultation

[5] Oxfordshire County Council. Successful funding bid is set to bring 159 electric buses to Oxfordshire. 29 March 2022. Available here.
[6] Oxford Bus Company. Deal signed to bring 159 electric buses to Oxfordshire. 31 January 2023. Available here
[7] Oxford Mail. Anger after travel chief announces traffic filters are 'going to happen, definitely' ahead of decision. 27 October 2022. Available here.
[8] Oxford Mail. Oxford traffic filters: Council accused of 'cover up'. 6 March 2023. Available here.
[9] Oxford Mail. Majority of residents and businesses object to the Cowley LTNs, consultation reveals. 22 February 2022. Available here.
[10] Oxford Mail. East Oxford LTN consultation: most people do not support proposal. 21 July 2021. Available here.
[11] Oxfordshire County Council / djs field & data services. Traffic filters pre-ETRO survey. Available here.
[12] Oxfordshire County Council. Zero Emission Bus Regional Areas (ZEBRA) – Funding Agreements. Cabinet meeting. 18 October 2022. Available here.

timeframe, lasting between 5 September 2022 and 13 October 2022[13]. This was then swiftly followed by an "extraordinary" cabinet meeting to approve the traffic filters decision on 29 November, out of cycle of regular cabinet meetings. And, to illustrate the rushed nature of the approval process, the 29 November meeting actually made two key decisions: it effectively decided a "do we think the traffic filters are a good idea as part of a package of wider measures?" proposal, otherwise known at the council's Central Oxfordshire Travel Plan, moments before making the substantive decision on whether or not to approve the traffic filters themselves. Eyebrows were raised about how an "in principle" decision, and its accompanying consultation, could usefully inform the substantive "approval" decision, taking place virtually at the same time.

9. Following the cabinet's endorsement of the traffic filters scheme, the electric buses were ordered and subsequently delivered[14]. However, delivery of the traffic filters did not occur, for reasons largely beyond the control of Oxfordshire County Council. A Network Rail-run scheme to replace a railway bridge at Botley Road near Oxford's central train station effectively scuppered the delivery of the traffic filters – initially for a period of weeks and latterly for several years, as deadlines for completing this work repeatedly slipped[15].

10. Oxfordshire County Council has repeatedly stated that it was unable to progress with the delivery of the traffic filters scheme so long as the Botley Road remained closed. Therefore, for many in Oxford and beyond, the expectation was that the traffic filters would not go live for several months. It was for that reason that the council's announcement, in June 2025, to consider a temporary congestion charge blindsided so many people, up to and including the leader of Oxford City Council. With the Botley Road reopening date eventually settled on August 2026, many in the city had come to believe that this was when the traffic filters scheme would eventually go live.

11. Barely two weeks after the congestion charge idea was first announced, Oxfordshire County Council's cabinet approved to take the proposal to consultation[16.] Once again, the consultation period was fairly short, running for just six weeks between 23 June 2025 and into the summer holidays, ending on 3 August 2025[17]. It was announced that a decision would be taken at the council's cabinet meeting in September – likely 10 September, at an additional meeting[18.], taking place before the scheduled 16 September cabinet meeting.

12. The suggestion that the scheme could be in place by the "Autumn" is potentially significant for two reasons: firstly, as revealed by a freedom of information request, the original traffic filter scheme envisioned a three-month registration process for permit application and system testing[19]. By contrast, this delivery schedule is far tighter, with less lead time – even though it is effectively the same scheme.

[13] Oxfordshire County Council. Consultation on traffic filters 2022. Available here.
[14] Oxford Bus Company. Oxford Bus Company completes electric roll out. 30 September 2024. Available here.
[15] Network Rail. New programme launched to reopen Botley Road summer 2026. Available here.
[16] Oxfordshire County Council. Proposal for temporary Oxford congestion charge. Available here.
[17] Details here.
[18] Details here.
[19] Reproduced on this Reconnecting Oxford X post.

13. Secondly, the deadline for delivering the 10% improvement in journey speeds, as set out in the "Oxfordshire Bus Service Improvement Plan"[20], is December 2025. Just as Oxfordshire County Council gave the impression of rushing to meet a deadline to secure a good price for the electric bus fleet in the Autumn of 2022, so now the council appeared to be rushing to meet yet another bus company-related deadline. It is not clear how the needs of Oxford's residents feature in the council's hierarchy of priorities, compared with its desire to deliver specific outcomes for the county's bus companies.

14. Justifying the congestion charge proposal, Oxford Bus Company managing Director Luke Marrion indicated why he believes the congestion charge scheme was essential – significantly due to the disruption to his company's service caused by the Botley Road closure. Describing the current situation as a "congestion emergency"[21], Mr Marion observes that his company has suffered "through reductions in our patronage on Botley Road, as well as substantial increases in journey times on other nearby roads – most notably Abingdon Road". Mr Marrion cites that: "Journey times on Abingdon Road have increased by an average of 17% since the Botley Road was closed", also adding that: "Our services between Blackbird Leys and Oxford City Centre – Oxford's busiest bus corridor - have slowed down by 33% compared to 2013 levels."

15. On this point, we observe that at least two Blackbird Leys to Oxford City Centre routes Mr Marrion identifies (i.e. the number one and number five) mostly do not run near Abingdon Road – the closest it gets is St Aldates, a road where cars are mostly banned. It does, however, run through one of the boundary roads of both the Cowley and East Oxford LTNs – about which, more shortly. In this same article, Mr Marion acknowledges that the East Oxford LTN has "slowed bus journey times further, as they funnel a lot of traffic from side roads onto the main bus routes converging at the Plain Roundabout". For those unfamiliar with Oxford's geography, the Plain roundabout is nowhere near either the Abingdon Road or Botley Road.

16. In justifying the imposition of the congestion charge, Mr Marion appears to be suggesting that highly localised problems in specific parts of Oxford (i.e. the Botley Road closure, the East Oxford LTNs), justify the introduction of a congestion charge affecting the entire city, including locations almost entirely unaffected by either scheme. While the closure of the Botley Road is currently an intractable problem that is not of Oxfordshire County Council's making, the East Oxford LTNs certainly are. As we have already indicated, Oxfordshire County Council installed the LTNs against the expressed wishes of those who responded to the consultation proposing them. We therefore suggest the obvious solution to this claimed "congestion emergency" is to remove one of its known causes: the LTNs.

17. More generally, it is also relevant that the "need" to introduce the scheme is not the first reason offered, or even the second. Rather, it is the fourth. To explain: the proposal now being consulted on is not just a variant on the traffic filters scheme, discussed previously. Rather, it is also a variant on a precursor scheme, ironically known as "Connecting Oxford".

[20] Available here.
[21] Oxford Clarion. Oxford's traffic emergency needs a bold approach – Luke Marion on the congestion charge. 1 June 2025. Available here.

This is the reason we describe the congestion charge as new wine in old bottles: that is exactly what it is. The bottles are not just old, they have been recycled several times before.

18. To start at the beginning: we believe the essence of the current congestion charge proposal, "Connecting Oxfordshire", was first articulated in Oxfordshire County Council policy "Local Transport Plan 4" (LTP4)[22], approved by the council in September 2015. In the initial iteration of this policy, there were suggestions of how to discourage "trips from west to north but maintaining access close to the Oxford Rail" around Hythe Bridge Street (the current scheme proposes to make anyone without a permit pay £5 to access the railway station); "On Thames Street – allowing access to Westgate from the south or west only but preventing or discouraging any through trips" (the current permit scheme effectively prohibits out-of-county visitors by car from entering the car park between 7am and 7pm); preventing or discouraging any through trips around St Cross Road by "preventing or discouraging traffic from using the Science Area as a city centre ring road (the road is practically empty for most of the time); "reduce the impact of congestion caused by high vehicle flows on the B4995" (Marston Ferry Road, a road where traffic flows freely, often at 40mph); "timed access restriction (e.g. bus gate) or road user charging point, on Hollow Way)." (this is essentially what is now being proposed).

19. As later articulated, the more narrowly focused "Connecting Oxford" policy was far harsher in its approach than the proposal described above: less "discourage" and more "prohibit" vehicles. Connecting Oxford did not envision any permits being made available for car drivers, or exemptions for lorries and vans. Instead, between the hours of 7am and 7pm, seven days per week, all vehicles other than buses and emergency service vehicles would be banned from passing a bus gate filter, on pain of a fine. The intention was that buses would (effectively) have exclusive access to several of Oxford's key arterial roads, for the entire period between morning and evening rush hours, freeing them up[23].

20. The scheme was first (briefly) consulted on between 18 September 2019 and 20 October 2019. A total of 2,932 respondents completed the survey. More respondents (42% versus 33%) believed the scheme would make their journeys worse. 14% said they thought their journeys would not be affected, and 11% did not know. Car drivers were particularly opposed to the scheme.

21. A few months later, as the Covid pandemic took hold, Oxfordshire County Council tried – once again – to introduce the scheme, albeit in slimmed-down form – and without any consultation[24]. In July 2020, it was announced that two of the original five bus gates would be installed, on Hythe Bridge Street and St Cross Road. A third bus gate was also considered, on Thames Street. On this occasion, the justification was not to rectify a congestion emergency (due to lockdown, this would be implausible). Rather, the justifications included the need "to support social distancing and to protect public health

[22] Available here.
[23] CONNECTING OXFORD Improving connectivity / Reducing congestion / Tackling pollution. Available here.
[24] Oxfordshire County Council. Councils to install new temporary bus gates in Oxford as part of the next stage of recovery. 2 July 2020. Available here.

across the city." A similar justification was made for closing (later, permanently) the High Street in the Oxfordshire county town of Witney[25] – a decision that remains controversial years later[26].

22. In October 2020, Oxford's "Oxford temporary bus gates plan" was formally scrapped. After the council relented on its initial refusal to consult on its plans, 7,200 people responded. The survey found that 46% of respondents were against the proposal, 35% in favour and 15% in favour with reservations[27].

23. Two years later, in September 2022, a consultation was launched regarding the traffic filter scheme. The scheme was less draconian than the original Connecting Oxford Scheme, due to the existence of car permits and van and lorry exemptions[28]. However, the flip side of this easing of restrictions was a significant degree of bureaucracy and council intrusion into Oxfordshire residents' private lives. For example, to be eligible for an "unpaid carers" permit, Oxfordshire residents would have to show that they are either in receipt of a carer's allowance or registered with their GP as a carer – they cannot simply be taken on trust. Frequent visitors to hospitals would only be allowed to use a permit when a registered car is "being used for, or in connection with, the transport of the person needing to attend hospital appointments" [29]. If nothing else, the scheme raises a whole host of data privacy considerations.

24. With the traffic filters charge scheme halted by the Botley Road closure, the consultation for its temporary replacement – the congestion charge scheme – was launched on 23 June 2025, almost three years later.

Why the history of this scheme matters

25. Why does this brief history lesson matter? We suggest it matters for two main reasons. Firstly, we believe that the history of the scheme, in its various guises, gives a strong indication that Oxfordshire County Council has fundamentally wedded to delivering a variant of the Connecting Oxford / traffic filters / congestion charge scheme for an entire decade, come what may – including tying itself to third parties, to contractually lock itself into a decision.

26. We believe this indicates the council is exhibiting two known behaviours at the same time, neither of which we regard as desirable: path dependency – the process where past events or decisions constrain later events or decisions. Here, it does not matter if the initial decisions regarding Connecting Oxford made no sense. Secondly, we believe the council is actively embracing the "sunk cost fallacy": after spending millions of pounds developing the

[25] Oxfordshire County Council. Councils work together to boost social distancing in Witney. 23 June 2020. Available here.
[26] Witney Gazette. Witney traders say road closure 'not necessary' for funding. 10 April 2024. Available here.
[27] Oxford Mail. Oxford temporary bus gates plan scrapped. 14 October 2020. Available here.
[28] Oxford Mail. Consultation launches on six 'traffic filters' in Oxford. 6 September 2022. Available here.
[29] Oxfordshire County Council. Oxford traffic filters: How they will work. Available here.

traffic filters scheme to the point at which it can now be made operational, the council now wishes to use a filters scheme to address a specific problem (the temporary blockage of Botley Road) even though the solution bares no resemblance to that specific problem. Or, indeed, the actual causes of congestion more widely in the city, which we discuss in chapter three.

27. Moreover, we believe this history demonstrates that the council is prepared to justify the scheme by reference to whatever criteria it considers expedient at any given time, be that improving social distancing (Connecting Oxford) or rectifying a congestion emergency (congestion charge scheme). In light of the council's evolving justifications for this scheme, we believe it is legitimate to be sceptical of the council's stated motives now.

28. Equally importantly, it should also be recognised that – apart from the addition of the St Clements filter – the congestion charge now being proposed is essentially the same as originally consulted on in September 2019; it is proposed to operate at the same locations at almost exactly the same times (Hollow Way and Marston Ferry Road excepted). The council appears unwilling to reflect on whether the scheme, as originally devised, remains appropriate, or stands a realistic chance of delivering its stated policy purpose – whatever the stated purpose happens to be at the time. To address these points head on, the evidence we present in this report indicates that the congestion charge locations proposed – and their timings – are demonstrably inappropriate for the scheme's stated policy objectives.

29. Developing this point: since its conception, the purpose of the scheme has changed. The proposal is now justified by reference to congestion reduction and related reasons. But there is a problem with this focus. As originally envisioned under Connecting Oxford, the roads initially selected were mainly chosen because they could be used to sever direct connections between adjacent neighbourhoods. To continue our old wine in new bottles analogy: wine from a bottle has now been poured into a washing-up bowl, simply because it is also a container of liquid.

30. To explain how Connecting Oxford was intended to sever connections between neighbourhoods: the Marston Ferry Road was originally intended to cut direct vehicular movement between Summertown and Northway / Marston / Headington, directing traffic via Oxford's ring road instead. Likewise, the Hythe Bridge Street filter was originally selected to cut vehicular connectivity between Jericho / Walton Manor and Summertown and Botley on the other – even if that meant a considerable detour by car, also via the ring road. In both of these examples, the scheme would have the effect of cutting off neighbourhoods with few facilities from their adjacent neighbourhoods with many facilities – arguably unfair, but also intended policy. This may also explain why the council has (belatedly) acknowledged that the scheme is only predicted to reduce vehicle miles by 1% - lengthy diversions are baked in.

31. The congestion charge scheme is therefore different from Connecting Oxford, in the sense that travel down main roads by private vehicles would now be allowed in some circumstances, either via exemptions, permits or the payment of a £5 daily fee. However, because elements of the scheme have been retained from Connecting Oxford, it also means we now have a farcical situation where congestion charge ANPR cameras are scheduled to be installed on roads that happen to be connecting roads, despite some of them not being

busy, congested, or even carrying any buses. It is therefore not clear how the scheme helps the Oxford Bus Company's Luke Marion to rectify his "congestion emergency".

A congestion charge scheme for (typically) not very busy roads

32. To illustrate how irrational the congestion charge locations are, one planned traffic filter location – St Cross Road – is such a minor road that it is not even classified, and barely makes it into the county's top 200 of roads where traffic levels are recorded. It also has no weekend bus service. Further, to demonstrate that this is not an outlier road, Table 1.1 (below) ranks the proposed congestion sites by annual daily (traffic) total – i.e. vehicle movements at specific recorded locations. To put these totals in context, the county-wide ranking of this road is also provided, by reference to annual average daily traffic (AADT) count. This table shows that the busiest proposed congestion charge road – St Clements – carries an average of 14,677 cars per day, making it just the 63rd busiest road in the county.

33. We should also point out that, while the comparative 2019 - 2014 AADT totals shown on table 1.1 are incomplete, they also indicate that overall traffic volumes on roads where data is available is either broadly static (Hythe Bridge Street) or activity falling (Hollow Way, St Cross Road). In light of this, there is no obvious case for a dramatic policy intervention, such as the introduction of the congestion charge, on these specific roads.

Table 1.1: Annual average daily traffic count - 2019 - 2024 at six main congestion charge locations

Location	Road Name	2019 AADT	2024 AADT	% change (where known), 2019 - 2024	County ranking by AADT count (2024)
St Clements	A420	-	14,677	N /a	63
Hythe Bridge Street	A4144	13,200	13,366	1%	78
Thames Steet West of St Aldates	A420	13,800	12,464	-10%	91
Marston Ferry Road	B4495	-	10,205	N / a	125
Hollow Way	B4495	10,500	8,961	-15%	162
St Cross Road	Unclassified	9,400	7,332	-22%	200

34. Moreover, the tendency for traffic levels to fall on these roads since the pandemic is not unusual. To illustrate this point, below we compare AADT levels on roads in Oxford where comparative information is available between 2019 and 2024. With a handful of exceptions, table 1.2 below shows that traffic levels have generally fallen across Oxford since the pandemic. As a result, we argue the onus should be on those who advocate extra restrictions on cars to objectively justify why such schemes are needed, not those who seek to oppose such measures. Oxford's roads, at least the roads that are routinely monitored, are generally not getting busier.

Table 1.2: Percentage annual average daily traffic count change, where data is available for both years – 2019 and 2024

Site	Location	Road Name	2019 AAI	2024 AAD	% change: 2019 - 2024
527	WARNEFORD LANE E OF MORRELL AVE.	Unclassified	9,200	5,038	-45%
516	A420 Oxford Botley Rd W of Seacourt Car Park	A420	24,200	16,266	-33%
501	A420 OXFORD,MAGDALEN BRIDGE	A420	21,800	14,899	-32%
526	B4150 MARSTON ROAD N OF A420	B4150	9,000	6,819	-24%
530	OXFORD ST.CROSS ROAD	Unclassified	9,400	7,332	-22%
406	A420 OXPENS	A420	15,500	12,133	-22%
658	Oxford Gypsy Lane	Unclassified	6,400	5,322	-17%
656	Oxford Parks Road	Unclassified	10,500	8,770	-16%
529	A420 OXFORD HIGH STREET ALL SOULS	A420	8,100	6,782	-16%
319	B4495 DONNINGTON BRIDGE	B4495	13,600	11,440	-16%
661	Oxford Windmill Road South Of Langley Close	B4495	10,400	8,849	-15%
525	A420 HEADINGTON RD E OF B4150	A420	8,100	6,904	-15%
304	B4495 HOLLOW WAY	B4495	10,500	8,961	-15%
517	Oxford Blackbird Ley's Rd NW of Sandy Lane West	Unclassified	9,300	8,161	-12%
403	THAMES STREET WEST OF SAINT ALDATES	A420	13,800	12,464	-10%
129	A40 SUNDERLAND AVENUE	A40	31,100	28,476	-8%
502	A4144 OXFORD,FOLLY BRIDGE	A4144	15,900	14,741	-7%
618/9	A40 West of Thornhill Park And Ride	A40	45,703	43,005	-6%
513	B480 Oxford.Garsington Rd SE of John Smith Drive	B480	17,800	17,086	-4%
528	OXFORD ST.ALDATES NORTH OF SPEEDWELL STREET	A420	6,600	6,376	-3%
511	Oxford,Horspath Driftway SE of Awgar Stone Road	Unclassified	19,800	19,232	-3%
509	B4150 Oxford Marsh Lane North of Horseman Close	B4150	16,700	16,251	-3%
514	A4158 Oxford RoseHill S of Newman Road	A4158	18,800	18,625	-1%
539	Oxford Cowley Rd East of Dawson Street	B480	10,100	10,468	4%
504	Oxford, Kingston Rd South of Leckford Rd	Unclassified	2,400	2,566	7%
508	A4165 Oxford Banbury Rd South of A40	A4165	13,400	14,407	8%
515	A4144 Oxford Abingdon Rd South of Weirs Lane	A4144	19,100	21,874	15%
551	Old Marston,Oxford Road North of Boults Lane	Unclassified	2,700	3,295	22%

35. To explain possible – highly specific – likely causes of recent increases in vehicle numbers may have occurred in recent years: the Cowley Road location is close to several recently installed LTN barriers in East Oxford, Abingdon Road is currently a diversion route for the Botley Road closure, and Oxford Road in Old Marston is a rat run from the bypass to avoid the regular morning traffic queues to the John Radcliffe hospital on Marsh Lane.

36. Returning to the specific planned congestion charge locations. Traffic carried on these roads are often noticeably less busy than many comparable roads, elsewhere in Oxford – or, indeed, in the wider county. To illustrate this point, table 1.3 indicates some of the busiest "normal" (i.e. roads that are – at least partly – residential) roads in Oxford (ranked by AADT), other than the traffic filters sites. Table 1.4 does likewise, for the wider county of Oxford.

37. Based on AADTs alone, five of the six roads listed below (Sunderland Avenue, Abingdon Road, Horspath Driftway, Rose Hill and the Slade) are better candidates for a congestion charge sites in Oxford than those proposed by OCC – with Abingdon Road a stand-out candidate, given that traffic is not only higher than every single traffic filter site, AADTs have also increased significantly since 2019. We would not advocate this, however, because the AADT count increase on Abingdon Road is likely due to the nearby Botley Road closure.

Table 1.3: Annual average daily traffic count - 2019 - 2024 at six locations elsewhere in Oxford

Location	Road Name	2019 AADT	2024 AADT	% change (where known), 2019 - 2024	County ranking by AADT count (2024)
Sunderland Avenue	A40	31,10	28,476	-8%	11
Abingdon Rd South of Weirs Lane	A4144	19100	21,874	15%	23
Horspath Driftway south east of Awgar Stone Road	Unclassified	19, 800	19,232	-3%	32
Rose Hill South of Newman Road	A4158	18,800	18,625	-1%	35
The Slade south of Dene Road	B4495	18,100	17,781	-2%	40
Headley Way North Of Woodlands Road	B4495		14,546	N/a	66

38. Similarly, elsewhere in the county, Banbury stands out as a far better candidate for a congestion charge than Oxford, as a whole. This is due to the town having far higher AADTs on various main roads around the town, compared with Oxford – a city with a population more than twice the size of Banbury's. In providing these comparable AADTs from elsewhere in the county, we have elected to discount non-residential roads in Banbury, such as the A361 / Southam Road (2024 AADT 14,458) – not that OCC would have to do likewise, in relation to Marston Ferry Road. Had we focused on all roads within Banbury with a higher AADT than the proposed Oxford congestion charge sites, the case for prioritising a congestion charge for Banbury (rather than Oxford) becomes ever more compelling.

Table 1.4: Annual average daily traffic count - 2019 - 2024 at six locations elsewhere in Oxfordshire

Location	Road Name	2019 AADT	2024 AADT	% change (where known), 2019 - 2024	County ranking by AADT count (2024)
Bridge Street (Witney)	A4095	23,773	23,721	**N/a**	16
A422 RUSCOTE AVENUE (Banbury)	A422	23,499	23,896	-4%	17
North Bar South of Castle Street (Banbury)	A361	20,054	19,889	-1%	29
Oxford Road South of The Hawthorns (Banbury)	A4260	17,823	18,031	-7%	39
Woodgreen North of Deacon Way (Banbury)	Unclassified	17,201	16,467	N/a	45
Orchard Way South of Warwick Rd (Banbury)	Unclassified	16,435	16,912	-6%	49

A congestion charge scheme for roads that are (often) not congested – and a congestion charge won't make them quicker

39. Of course, AADTs are one thing: congestion is another. It is, for example, quite possible for a road to carry a large volume of vehicles and not be congested. Likewise, it is possible for a road to carry a small number of vehicles and be highly congested. But here, even the most elemental understanding of Oxford's traffic flows (i.e. those gleaned from congestion data on Google Maps) suggests that most of Oxford's proposed traffic sites are not congested, either at any time of the day or during the congestion charge's proposed hours of operation. We therefore question both the rationality of the council's ANPR location selection and the proposed timings of the congestion charge scheme on affected roads.

40. In support of this assertion, we conducted a granular analysis of congestion levels of each of the planned congestion charge locations, using Google Map's "typical traffic" slider, at specific times of the day for all seven days. Each road has its own distinctive congestion quirks, but the case for a 12-hour-a-day congestion charge was made for none of them.

41. Having experimented with various ways to present our findings, we have elected to use the same colour scheme as Google to illustrate our findings, ranging from green (free flowing) to brown (heavily congested). However, also mindful that Google can occasionally display red simply due to small queues of traffic waiting at traffic lights, we have then attempted to quantify how long it would typically take to get through a section of congested roads. The numbers presented below are therefore offered in (approximate) seconds of journey time.

42. Via an environmental information regulations request (more commonly known as a freedom of information request)[30], we have also obtained detailed modelling data, comparing the "do nothing" versus the proposed "do something" (i.e. introduce the congestion charge). It has been difficult to process this information because, in its response, Oxfordshire County Council did not provide a "key", explaining which data focused on which roads. We have therefore attempted to do so, using the Ricardo report to cross-reference locations where available. This has given us a partial picture of the underlying modelling. Although incomplete, the findings are illuminating. In this section, we focus on modelled road speeds, before and after the imposition of the £5 congestion charge.

43. We also collected video footage for most of the sites, captured at various times of day.

St Cross Road

44. The typical traffic flows in St Cross Road have been analysed in three locations i.e. at the junctions with Longwall Street, South Parks Road and the Longwall Street / High Street traffic lights. St Cross Road is located directly between Longwall Street and South Parks Road.

45. Table 1.5 below clearly shows that there is very little congestion at all on the Parks Road, St Cross Road, Holywell route around the city centre. Any congestion that does occur (typically

[30] Environmental information regulations request - 25762 EIR. Available here.

a few dozen yards long) is primarily due to the High St / Holywell junction traffic lights. The only time that any congestion typically occurs on this road, between 4pm - 6pm, the maximum time to travel through it is just over two minutes. As a result, there appears to be no justification whatsoever for a congestion charge ANPR filter on this road, still less one that operates 7am – 7pm, seven days per week, 365 days per year.

Table 1.5: Google Maps' typical traffic levels on St Cross Road, plus estimated journey times in seconds

46. While not congested in its own right, St Cross Road is one of the few direct routes through the city from east Oxford to north Oxford. Any imposition of a charge on this route is likely to cause extra traffic and congestion elsewhere, as vehicles take lengthy diversions. This route is largely non-residential, with buildings mostly set back far from the road. By contrast, alternative routes – namely Iffley Road – are very much residential. As a result, it appears incredible to conceive how the council can possibly believe this filter to be a good idea.

47. We understand St Cross Road currently carries just two bus routes, the ST1 and the ST2. The ST1 does not run at weekends. The ST2 runs a service every two hours on Saturday, and does not run on Sunday. This arguably adds yet another level, if another level is needed, to the council's irrationality in making this road a seven-day-per-week congestion charge location.

48. We have not been able to obtain "do nothing" / "do something" modelling data for this road, because Ricardo did not include this road in their published report. However, in the absence of this, we have recorded numerous videos of the specific planned congestion charge site. These videos clearly show how little traffic there is on this road: during term time[31], when schools (state[32] and private[33]) are on holiday, in the morning or the evening[34]. These videos further illustrate our belief that elements of Oxfordshire County Council's approach to traffic and congestion management are deeply irrational.

[31] https://x.com/ReconnectingOx/status/1939653594669592908
[32] https://x.com/ReconnectingOx/status/1942128932322509056
[33] https://x.com/ReconnectingOx/status/1942128932322509056
[34] https://x.com/ReconnectingOx/status/1944817346406719598

Hythe Bridge Street

49. There is typically very little congestion on Hythe Bridge Street, either during the morning rush hour[35] or at weekends, during peak shopping hours[36]. Observation of the traffic trends shows that most of the traffic proceeds eastwards, instead using either Park End Street to the city centre or diverts around the outer edge of Oxford city centre via Thames Street. Again, the reason why Oxfordshire Council believe this road is suitable for an ANPR traffic filter / congestion charge camera is not clear.

50. Observation of the traffic flows shows that, at weekends, traffic may be held back by vehicles awaiting access to the Westgate car park on Thames Street. The traffic lights at the junction of Beaumont Street, Walton Street and Worcester Street may also be contributing to any (short-term) congestion that occurs – but this is not significant, as video evidence collected at this specific site shows[37].

51. Depending on the length of time that Google Maps takes to devise these averages (which is not made clear), it is possible that the averages for this road may not reflect the closure of the nearby Botley Road. This is because this road leads directly to Botley Road and, behind the closed road, several of Oxford's main retail parks, now cut off from access to residents via city centre routes. Therefore, the chart below could vary considerably from the current situation until the Botley Road reopens in November 2026. It is possible that the chart below overestimates the traffic flow currently occurring on the road.

Table 1.6: Google Maps' typical traffic levels on Hythe Bridge Street, plus estimated journey times in seconds

	Hythe Bridge Street - East to West											
Day	6.00am	7.00am	8.00am	9.00am	10.00am	12.00am	14.00pm	16.00pm	17.00am	18.00pm	19.00pm	20.00pm
Monday						10						
Tuesday										10		
Wednesday								10	10			
Thursday									56	10		
Friday									56			
Saturday						56	56		56			
Sunday												
	Hythe Bridge Street - West to East											
Monday												
Tuesday												
Wednesday												
Thursday												
Friday												
Saturday									45			
Sunday												
	Congestion is occuring at the junction with George Street but it clears when the road heads north											
	*The elapse times shown are provided in seconds											

52. We are not aware of any bus services using this road. Instead, they mainly use the adjacent Worcester Street / Park End Street route. Because this alternative route starts with the bus-

[35] https://x.com/ReconnectingOx/status/1944658769092222992
[36] https://x.com/ReconnectingOx/status/1949421830034337913
[37] https://x.com/ReconnectingOx/status/1939791618133172390

only George Street[38], and continues to Park End Street (the end of which is currently blocked with the closed Botley Road), there is little traffic in this vicinity either.

53. Once again, taking the worst-case scenario on this road (i.e. average kph, when the modelling suggests congestion), the improvements in traffic speeds by introducing the congestion charge appear marginal, at best. Typically, this road is free-flowing.

Table 1.7: Modelled impacts on road speeds at Hythe Bridge Street during congestion – do nothing versus do something (kph)

Do what?	Average	AM peak average	Inter-peak average	PM peak average
Nothing	26.46	26.58	26.58	26.15
Something	27.64	27.51	27.73	27.55
Difference	**+1.18**	**+0.93**	**+1.15**	**+1.4**

St Clement's

54. St Clement's is a road that, historically, has been renowned for its congestion and pollution (overwhelmingly, caused by buses[39]). This narrow road is the principal western route into and out of Oxford. From the West, access is via the Plain roundabout. To the east, three roads – Marston Road, Headington Road and Morrell Avenue feed into it.

55. However, what vehicle restriction advocates rarely acknowledge is that this road is very short, approximately 500 metres. Any congestion that does occur on this road will not take long to pass through, precisely because of its short length. As we indicate below and reinforced with video evidence, there is often little traffic on St Clement's[40], even during state[41] / private school term time during the morning rush hour – still less when the congestion-inducing private schools break up[42]. But, even in the absolutely worst congestion situations, journey times along this road are typically just over six minutes. Beyond St Clement's to the East, there is typically very little congestion along Marston Road or up Headington Hill, in particular. The road is a pinch point, no more.

56. St Clement's is also an LTN boundary road. And, as the bus companies have previously made clear, the introduction of the LTNs in East Oxford made this entire area more congested. We return to this topic in chapter three.

57. In its short length, St Clement's has three pedestrian crossings and four bus stops, all of which increase congestion. For deliveries to the area's shops and restaurants, there is often no rear loading, requiring vans and lorries to park on the road itself. In the past, a new bus

[38] Oxfordshire County Council. Bus lanes and bus gates. Available here.
[39] See earlier editions of Oxford City Council's Oxford Source Apportionment studies.
[40] https://x.com/ReconnectingOx/status/1949120057306464652
[41] https://x.com/ReconnectingOx/status/1933061016436306233
[42] https://x.com/ReconnectingOx/status/1942119154976165915

lane was introduced but then partially withdrawn[43], due to its introduction causing additional congestion and disruption at the junction with Marson Road and Morrell Avenue.

58. Tale 2.8 below shows that the west to east route – i.e. heading toward Marston and Headington from the Plain is generally entirely clear for most of the day, until 4pm during weekdays. Nevertheless, the proposal for this road is congestion charge restrictions from 7am until 7pm, seven days per week. The east to west route is generally far busier, mainly building from 12 noon – far later than the proposed ANPR restrictions are due to start.

Table 1.8: Google Maps' typical traffic levels on St Clements, plus estimated journey times in seconds

	St Clements - East to West											
Day	6.00am	7.00am	8.00am	9.00am	10.00am	12.00am	14.00pm	16.00pm	17.00am	18.00pm	19.00pm	20.00pm
Monday			25	10		25	25	60	50	370	100	
Tuesday			60	10	10	25	75	60	50	370	370	25
Wednesday			30	10	10	50	75	350	200	370	370	25
Thursday			50	12	12	80	80	220	370	200	370	80
Friday			33	10	12	80	60	200	200	370	100	50
Saturday						80	14	25	100	370	80	25
Sunday						25	33		100	10		
	St Clements West to East											
Monday			33					19				
Tuesday			33					75				
Wednesday			19				33	19				
Thursday			19				33	75	19			
Friday						44	19	19	19			
Saturday						35	33					
Sunday												
	* all times shown are shown as seconds											

59. St Clements is a major bus route, carrying around 12 local services, plus airline and other intercity services such as the Oxford tube.

60. We were somewhat surprised to see the modelled worst case (i.e. the road is congested) findings for St Clements. The modelling appears to show that, even in this scenario, the congestion charge will make no difference to the speed of traffic on this road, at any time of the day.

Table 1.9: Modelled impacts on road speeds on St Clements during congestion – do nothing versus do something (kph)

Do what?	Average	AM peak average	Inter-peak average	PM peak average
Nothing	32.00	32.00	32.00	32.00
Something	32.00	32.00	32.00	32.00
Difference	**0.00**	**0.00**	**0.00**	**0.00**

[43] Oxfordshire County Council. Experimental Bus Lane - Oxford: A420 St Clements Street/Headington Road. Available here.

Thames Street

61. Thames Street is the primary route around the southwest of Oxford, acting as an inner ring road. When the Botley Road is open, it connects the largely residential area of New Hinksey with its nearest retail centre, on Botley Road. Although it has the appearance of being one continuous road, approximately 0.7 miles long, it is actually two: Thames Street near Abingdon Road and Hollybush Row near Frideswide Square.

62. The road contains many businesses, an education centre, an ice rink and a major privately owned car park associated with the Westgate shopping centre.

63. It was difficult to interpret the travel flow times on these roads with any degree of accuracy. Observations of the traffic flows show that there are numerous times when there are stretches of fast[44], slow and slower travel times, on the same section of road. It is clear, however, that the Westgate Centre has a significant impact due to the number of cars travelling to the car park.

64. In recognition of this, we include two tables to indicate congestion levels on this road, despite its short length. One focuses on the Abingdon Road[45] end (Thames Street) nearest to the Westgate car park, the other on the Hollybush Row end, near Frideswide Square[46]. Areas we found it particularly problematic to classify, because they change so frequently, are marked in blue, below.

Table 1.10: Google Maps' typical traffic levels on Thames Street, plus estimated journey times in seconds

Abingdon Road - Thames Street - South to North											
Day	6.00am	7.00am	8.00am	9.00am	10.00am	12.00am	14.00pm	16.00pm	17.00am	18.00pm	19.00pm	20.00pm
Monday			4			78				4	4	
Tuesday			6		4		4		4	4	4	4
Wednesday				4	18	4		4	4	4		4
Thursday					4	4		18	4	4	4	4
Friday			4		4	4	6	12	4	4	4	
Saturday				4	4				4	4	4	
Sunday						66	89		36	4		4
		The whole road is intermittently congested with green, yellow and red sections										

Thames Street - Abingdon Road - North to South												
Monday				4	6	33	22	22	66			
Tuesday			4	6	6	22		22	66	6		
Wednesday			6	6	6	22	22	58	75	50		
Thursday				4	S	22	22		75	4		
Friday			S-		6	4	22	50	33	6	6	
Saturday					S	66		900	66	66	B	
Sunday						66		22	66			
	Minor different congestion areas are occuring to local parts of road also e.g Car Park entrances / exits and bus stops											

[44] https://x.com/ReconnectingOx/status/1944654641045614716
[45] https://x.com/ReconnectingOx/status/1946523906132623563
[46] https://x.com/ReconnectingOx/status/1946529531134714292

65. As table 1.10 above indicates, Thames Street is – on occasions – virtually full of slow-moving cars, particularly in late afternoon, immediately before the Westgate's £6 cheap evening parking tariffs starts[47]. At its very worst, average traffic levels can take around 15 minutes to clear this area at this time. We wonder if this congestion is mainly used by evening visitors to the city, seeking to park their cars in the cheapest and most convenient location to access Oxford's nightlife, including its theatres and bars.

66. That said, as the video evidence we collected verifies, congestion is often highly localised to the immediate vicinity of the Westgate car park entrance[48], rather than at either end of the same road. By the time vehicles travel to Hollybush Row, or the Abingdon Road end of Thames Street, traffic is often once again typically free-flowing[49].

67. We do not shy away from the fact that the Westgate shopping centre causes congestion in this area. However, we reiterate that this congestion is typically highly localised to within a few hundred yards, and does not even reach as far as Hollybush Row.

Table 1.11: Google Maps' typical traffic levels on Hollybush Row, plus estimated journey times in seconds

	Hollybush Row - St Frideswide Square- South to North											
Day	6.00am	7.00am	8.00am	9.00am	10.00am	12.00am	14.00pm	16.00pm	17.00am	18.00pm	19.00pm	20.00pm
Monday								22	22			
Tuesday								22	22			
Wednesday								22	22	22		
Thursday								22	22			
Friday								54	50			
Saturday								22	22	22		
Sunday									22			
	Fridewide Square - Hollybush Row - North to South											
Monday												
Tuesday												
Wednesday												
Thursday												
Friday												
Saturday												
Sunday												
	All times shown are in seconds											

68. Perhaps surprisingly, in light of its proximity to the back entrance to the Westgate shopping centre, Thames Street is not a major bus route. There is, however, a specific reason for this. Buses serving this area from the south via Abingdon Road typically continue north from Abingdon Road into St Aldates (which is closed to private vehicles for much of the day), and then into Speedwell Street. Both of these roads are major bus pick-up and drop-off points. From the junction of Speedwell Street and Old Greyfriars Street, Speedwell Street turns into a bus-only road past the back of the Westgate shopping, initially running parallel with Thames Street. As such, buses entirely bypass any congestion that occurs on Thames Street, emerging via Norfolk Street and Castle Street onto New Road. It is therefore difficult to argue that the Thames Street ANPR congestion charge checkpoint will help bus services – because most buses already bypass Thames Street.

[47] Westgate Centre. Parking at Westgate. Available here.
[48] https://x.com/ReconnectingOx/status/1934204633687167064
[49] https://x.com/ReconnectingOx/status/1933089897667264749

69. In light of the above, we are not entirely sure at what point on Thames Street was monitored, to produce the modelled road speed comparisons between "doing nothing" versus "doing something", during periods where the road might be regarded as being congested. In any event, we reproduce the modelled results below. The modelling shows no difference in road speeds whatsoever on this road as a result of introducing the congestion charge.

Illustration 1.1: buses on Speedwell Street, near Thames Street

Table 1.12: Modelled impacts on road speeds on Butterwyke Place / Thames Street during congestion – do nothing versus do something (kph)

Do what?	Average	AM peak average	Inter-peak average	PM peak average
Nothing	40.00	40.00	40.00	40.00
Something	40.00	40.00	40.00	40.00
Difference	**0.00**	**0.00**	**0.00**	**0.00**

Marston Ferry Road

70. Our analysis of traffic flows using Google Maps 'Typical Traffic' makes it difficult to understand why Oxfordshire County Council has selected Marston Ferry Road to be a traffic filter / congestion charge location. There is minimal congestion recorded during a typical weekend. Yet, despite this, the council is proposing to impose a £5 daily charge between the hours of 7am – 9am and 3pm – 6pm on Saturdays.

Table 1.13: Google Maps' typical traffic levels on Marston Ferry Road, plus estimated journey times in seconds

	Approximate Times To Clear Congestion (secs)											
	Marston Ferry Road - Traffic Flow East to West											
Day	6.00am	7.00am	8.00am	9.00am	10.00am	12.00am	14.00pm	16.00pm	17.00am	18.00pm	19.00pm	20.00pm
Monday			111	33								
Tuesday				64								
Wednesday												
Thursday												
Friday			100	56		13				22		
Saturday						28						
Sunday			8									
	Marston Ferry Road - Traffic Flow West to East											
Monday												
Tuesday			22									
Wednesday			22									
Thursday			22					22				
Friday												
Saturday												
Sunday												
	* Abstracted from Google Maps - Typical Traffic											

71. Similarly, there is little congestion on the Marston Ferry Road proceeding towards Marston. The little congestion that exists is believed to be mainly due to the traffic lights at the junction with Marsh Lane. This is mainly due to extensive traffic coming from Marsh Lane, causing congestion in Cherwell Drive, during the peak hours of 8.00am – 9.00am and 16.00pm - 18.00pm and proceeding to Headley Way or the Marston Road. As we explain in chapter three, the congestion charge scheme is projected to make congestion on Marsh Lane worse, not better. Moreover, as we explain in considerable detail in subsequent chapters, we believe much of this traffic is hospital traffic, and therefore largely immune to the council's traffic reduction strategies.

72. There is an element of congestion on the Marston Ferry Road at the west end due to the Banbury Road traffic lights and bus stops located on Marston Ferry Road itself; The congestion on Banbury Road can prevent vehicles from entering Banbury Road in either direction, or across the Banbury Road to Moreton Road.

73. We have a selection of videos available, mostly taken in the morning rush hour before the state school holidays[50], to illustrate Marston Ferry Road traffic. Videos are shot both approaching the congestion charge site by road[51] but also at the site itself[52]. Some of these videos directly compare[53] congestion levels on Marston Ferry Road, where there is almost no traffic and yet a congestion charge checkpoint is planned, with Marsh Lane[54]. Marsh Lane is predicted to get more traffic as a result of the congestion charge being introduced.

74. Marston Ferry Road is not a major bus route. We believe just three bus services use this road.

[50] https://x.com/ReconnectingOx/status/1942483649623924953
[51] https://x.com/ReconnectingOx/status/1933089897667264749
[52] https://x.com/ReconnectingOx/status/1932332064579235878
[53] https://x.com/ReconnectingOx/status/1935243498648748411
[54] https://x.com/ReconnectingOx/status/1937407180895850969

75. Focusing on road speeds during periods of congestion, not when it is free-flowing at 40 kph, introducing a congestion charge appears to make practically no difference to average road speeds. This is not surprising, because this road is already mostly free-flowing and suffers from very little congestion.

Table 1.14: Modelled impacts on road speeds on Marston Ferry Road during congestion – do nothing versus do something (kph)

Do what?	Average	AM peak average	Inter-peak average	PM peak average
Nothing	35.95	36.03	36.10	35.63
Something	36.13	36.02	36.20	35.78
Difference	**+0.18**	**-0.01**	**+0.1**	**+0.15**

Hollow Way

76. Hollow Way is – effectively – a narrow inner ring road serving east Oxford, acting as a principal road corridor between Headington and Cowley. The traffic flow to the north (Headington and access to the Eastern bypass) is consistent, with few delays of any note. Reduced traffic flow speeds appear entirely due to the roundabout at the junction of the Slade and Horspath Driftway.

77. The south route leads onto traffic lights at the junction with Garsington Road, another main route out of Oxford via the Cowley Road. It is suspected that the traffic flow level speeds have recently been reduced due to;-

- LTNS, which forces vehicles to circumvent numerous local roadblocks surrounding Cowley Road, and therefore use the Cowley / Oxford / Garsington Roads to access or leave Oxford.
- Shops are on Hollow Way with parking available outside. Many of the shops have no rear access. Therefore, loading / unloading takes place on Hollow Way Road itself.
- There are bus stops along Hollow Way that cause congestion.
- There are large residential areas located on both sides Hollow Way; this road is the only access / exit from these residential areas.

78. We understand six bus services run on Hollow Way. As a result, these buses do get caught up in any peak time congestion on this road, which can add (roughly) an extra 3.5 minutes to an evening journey, during the evening rush hour – for more details, see table 1.7.

79. As table 1.16 below shows, it is perhaps ironic that the congestion charge is likely to fractionally increase journey times on Hollow Way at exactly the same time that it is already at its most congested – i.e. 5pm – 6pm. Outside these times, the congestion charge is predicted to have almost no impact on road speeds on Hollow Way. This is yet another example of why the whole scheme has little value.

Table 1.16: Modelled impacts on road speeds on Hollow Way during congestion – do nothing versus do something (kph)

Do what?	Average	AM peak average	Inter-peak average	PM peak average
Nothing	16.45	16.71	16.63	15.87
Something	16.31	16.19	16.52	15.91
Difference	**-0.14**	**-0.52**	**-0.11**	**+0.04**

Table 1.17: Google Maps' typical traffic levels on Hollow Way, plus estimated journey times in seconds

	Hollow Way - North to Horsepath Driftway											
Day	6.00am	7.00am	8.00am	9.00am	10.00am	12.00am	14.00pm	16.00pm	17.00am	18.00pm	19.00pm	20.00pm
Monday		5		5		5	5	5	5	5		
Tuesday		5		5	5		5	5	5	5	5	
Wednesday		5		5	5	5	5	5	5	5	5	
Thursday		5		5	5	5	5	5	5	5	5	
Friday			5	5	5	5	5	5	5	5	5	
Saturday						5		5				
Sunday												
	Hollow Way - South to Garsington Road											
Monday			14	5					125			
Tuesday			14		14				200			14
Wednesday						14	44	113	200			
Thursday			14	14				55	200		14	
Friday				14								14
Saturday								44	28	44		
Sunday						69	14	44				
	* Times listed are seconds											

80. As these case studies of the proposed congestion charge sites show, there is already little congestion on several of these roads – and some carry no buses at all. When probed in detail, the council's own modelling data appears to show that the introduction of the congestion charge will yield practically no benefits, in terms of road speeds – and, on occasions, very small detriments. It is therefore not clear how an ANPR congestion charge will help to relieve congestion in general, or bus services specifically. Nor is it clear how it will improve bus journey times.

Conclusions

81. Our overall takeaway from this chapter is that Oxfordshire County Council is determined to introduce a congestion charge – or a variant of it – come what may. It appears to be irrationally embracing path dependency to deliver a scheme it has committed to, in one way or another, for an entire decade – even though this scheme was never intended to fix the (very specific) problems caused by the temporary closure of Botley Road. In doing so, it has also repeatedly put the preferences of Oxford's bus companies above all other considerations.

82. The council also appears to be embracing a variant of the "sunk cost fallacy": i.e. we have spent millions of pounds developing a scheme for one policy; let's use it for another reason entirely, mainly because we can".

83. However, there is a problem with this approach. Because the scheme itself has no rational basis, other than to inhibit flows of traffic within the city, the locations where the congestion charges are proposed are almost guaranteed to make no difference to bus journey times.

84. Several of the roads (Marston Ferry Road, St Cross Road, Hythe Bridge Street) are free-flowing for all of the day. Thus, the speed of traffic on this road cannot realistically increase without raising speed limits. Other roads are only congested (St Clements, Hollow Way, Thames Street) for limited periods of time. As a result, the modelled predicted changes to speeds on this road show improvements that are often so small they are practically meaningless, even during periods of congestion. Or, in the case of St Clements and Thames Street, no improvement in road speeds whatsoever can be indicated.

85. If this is not bad enough, some proposed congestion charge roads carry few (Marston Ferry Road, St Cross Road) or no (Hythe Bridge Street, Thames Street) buses, in any event. In some circumstances, bus journey times cannot improve on these roads following the introduction of a congestion charge because no services operate on them anyway. And no bus operator is likely to create a new bus service along Thames Street, when a partially bus-only road (Speedwell Street) is already available, directly alongside it.

86. In light of the evidence presented above, we cannot see any rational basis for Oxfordshire County Council introducing a congestion charge on these roads.

Chapter 2: The congestion charge's modelled winners and losers – and questions about modelling itself

Introduction

1. This chapter covers two main topics. Firstly, taking the congestion charge reports produced by Oxfordshire County Council's retained consultants, Steer and Ricardo, at face value, we highlight the embedded inequality of the proposed scheme. In part two, we begin the process of critiquing these two reports themselves, with a particular focus on the two reports' modelling. Given the extreme time constraints for producing our own report, and our freely acknowledged lack of understanding of modelling techniques, this report only scratches the surface of our concerns.

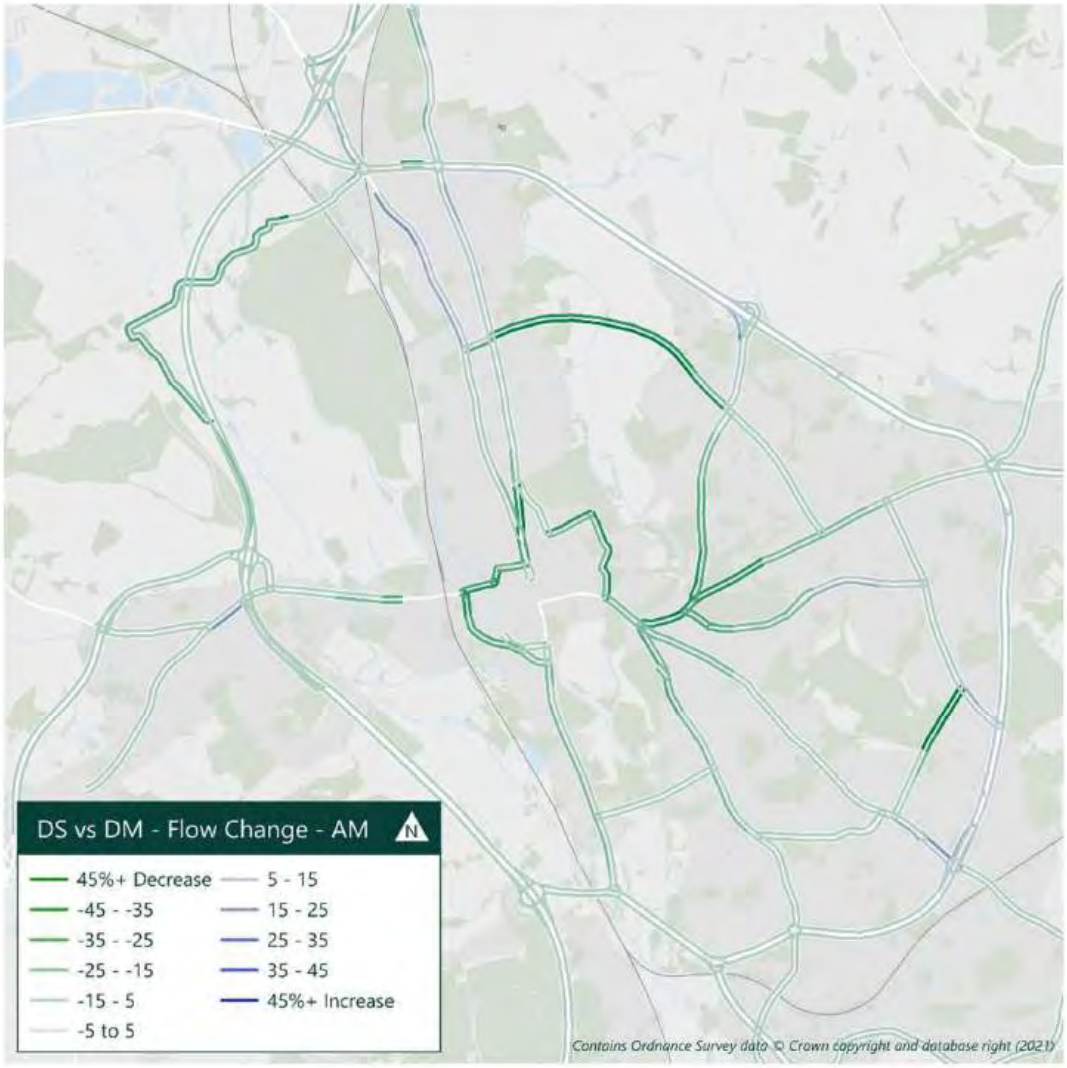
Part one: Winners and losers in the congestion charge proposal

2. The capacity for the congestion charge scheme to create winners and losers is graphically illustrated in the Steer predictions for peak time morning traffic flows with the £5 congestion charge scheme is in place. Clear winners are the inner stretch of Iffley Road near the Plain, St Clements and parts of Hollow Way. Clear losers are sections of the Woodstock Road near the Wolvercote Road, and the section of Garsington Road near the Southern bypasses.

3. Some of the winners (Iffley Road, St Clements) are residential areas, as is one of the key losers, Woodstock Road. But, as anyone who is familiar with the city will also notice, one of the biggest winners is Marston Ferry Road, a free-flowing road that passes through open countryside for much of its length. Headington Hill, a usually deserted stretch of wide road running alongside South Parks, is also a major winner, as is the free-flowing (non-residential) bottom end of Marston Road. It gets odder. The science area (where Monday – Saturday buses run so freely they struggle to keep to the 20mph speed limit) is a main beneficiary. The never-busy Hythe Bridge Street, likewise. Hollow Way is predicted to have less traffic at the top end of the road, near the junction with the Slade, the opposite end to where traffic regularly builds up. Thames Street will markedly improve – a fact that will make little difference to the buses that serve the area, which already run along the parallel bus-only Speedwell Street. If a scheme had been commissioned with the intention of mainly benefiting empty roads, this is what would have been designed.

4. At other times of the day, traffic flows on the already quiet roads around Headington Hill, Marston Road and the science area, are predicted to fall in the region of 45% compared with current levels, during both interpeak and evening peak hours. Marston Ferry Road is predicted to be busier during the interpeak and quieter during evening peak, Hollow Way likewise. Both are peak-time only congestion charge sites, so time-shifting is presumably expected. Traffic on Garsington Road gets noticeably busier during the evening rush hour, up by around 45% at the Hollow Way end of the road.

Illustration 2.1: Steer's morning peak time modelled traffic flow change, "do minimum", do something - £5 congestion charge



5. The Steer report provides the helicopter view on the modelled impact of the congestion charge scheme. By contrast, the Ricardo report provides the detail, both in terms of modelled traffic flow changes and modelled pollution impacts. It is here, for example, that we discover that the residential Woodstock Road is predicted to carry an extra 1,217 vehicles per day near the Woodstock Road (up 17%) near the Wolvercote roundabout, the equivalent to an extra 444,205 cars per year. For the Cowley residents of Oliver Road, who live immediately adjacent to the Eastern bypass, an extra 1,965 vehicles per day are predicted to be passing along the end of their road, up 11.3%. The rush hour traffic jam that is Marsh Lane is predicted to carry an extra 352 vehicles per day (up 4.6%) – presumably on the basis that its peak time capacity is already reached, with traffic queuing along its entire length as far as the ring road.

Illustration 2.2: Winning – Headington Hill

Illustration 2.3: Losing – Oliver Road

6. There are, of course, predicted winners, notably for St Clement's, which is a residential road, as well as a major bus route, with traffic throughput predicted to fall by between 4,116 (down 43.4%) and 4,872 (down 51.2%) per day. Likewise, residents of Iffley Road near Stanley Road (which, as a long-standing bone of contention, is located near 123 Iffley Road, not 23 Iffley Road), are predicted to see traffic levels fall by 1,219 (13.3%) vehicles per day. But, as previously indicated, several of the biggest winners are already quiet, free-flowing roads, such as Marston Road near St Michael's Primary School (down 32% - 1,274), Hythe Bridge Street (down 38.% - 1,734) and Marston Ferry Road (down 645 – 15.4).

7. Some of Ricardo's modelling outcomes are a little odd, to say the least. It is not clear, for example, why London Road is predicted to see a 28% fall in traffic, equivalent to 1,290 vehicles per day, despite being nowhere near a congestion charge site and also being on the main approach road to the John Radcliffe Hospital.

8. Overall, the modelled NO2 pollution impacts of the scheme are fairly marginal, typically within 1-2 µg/m3. The unfortunate residents of Oliver Road, for example, are predicted to receive a 1.5 µg/m3 increase in annual pollution exposure (up from 25.5 µg/m3 to 27.0 µg/m3), as are residents of Woodstock Road near the Wolvercote roundabout (up from 17.3 µg/m3 to 18.5 µg/m3). By contrast, residents of Abingdon Road near Weirs Lane are modelled to receive a directly equivalent 1.5 µg/m3 fall (down to 22.3 from 23.8), while Stanley Road / Iffley Road residents receive a fractionally smaller reduction - 1.4 µg/m3 (down to 20.2 from 21.6). Across all reported sites, the standout pollution winner is predicted to be St Clement's, with pollution levels predicted to fall by 10.4 µg/m^3– 11.6 µg/m^3.

9. Unfortunately, for Ricardo, it was the pollution numbers that caught our eye. For the past few years, we have systematically collated recorded NO2 pollution numbers around Oxford, as part of our evaluation of the impacts of the LTNs and the justification (or not) for the planned expansion to the zero-emission zone. We therefore had a fair idea of what the latest numbers were. Ricardo's numbers were different. So we examined them thoroughly, and compared them with validated 2024 numbers. We found that the "DM-BR" numbers quoted in Ricardo's report (i.e. do minimum / nothing) – which are intended to broadly reflect current reality, in many cases, did not. This sparked an investigation, still ongoing, into the modelled data published by both Ricardo and Steer in their respective reports.

Part two: a critique of the numbers quoted by Steer and Ricardo

10. To their credit, Ricardo freely acknowledged that their approximate representation of "now" - i.e. DM-BR is generated by a complex methodology which links together (often non co-located) traffic and pollution monitoring stations, and then "adjusted using an air quality model adjustment factor of 2.34 derived from an existing validation of the Oxford air dispersion model". We also appreciate that Ricardo may have been under acute time pressure to produce their report, which was published alongside the consultation on 23 June 2025.

11. Where we have less sympathy with Ricardo is their decision – unless they were specifically required to – to use a modelled version of "now", based on a transport model last updated in 2023[55]. The year 2023 is significant for two main reasons relevant to Ricardo's modelling. Firstly, it was the year when the Botley Road closed – in April 2023. It was also the year immediately prior to the rollout of Oxford's electric bus fleet. Both of these developments have had a significant effect on Oxford. We therefore believe 2023 serves as a poor baseline year to model the starting point of a policy that promises to transform Oxford yet again.

[55] Environmental Information Regulations: 25776 EIR. Available here.

12. At the time they were commissioned to write their congestion charge evaluation report, Ricardo would have been fully aware of the potentially transformative impact of the electric bus fleet on Oxford. Indeed, the company published a report in February 2025, commissioned by Oxford City Council, part of which attempted to model the predicted outcome of the electric bus rollout on pollution levels in Oxford[56]. Moreover, Ricardo was also directly involved in the production of the Oxonair.uk website, a website that presents the latest and recent historic levels of NO2 pollution across Oxfordshire, in an easy-to-use map-based solution[57]. In light of this longstanding relationship with Oxford City Council, the council responsible for compiling NO2 pollution reports in Oxford, we would be surprised if Ricardo did not have prior access to real-world 2024 NO2 pollution numbers ahead of official publication[58], which typically occurs on Clean Air Day – 19 June.

13. The upshot of Ricardo's use of modelled data in its congestion charge report is that the version of "now" it presents bears little resemblance to recorded reality in 2024 – a year when Botley Road was fully closed and Oxford's electric bus fleet rollout had begun in earnest. We provide our comparison between the real-world version of "now" in 2024 (as indicated in Oxford City Council's June 2025 Annual Air Quality Annual Status Report 2024[59]) with Ricardo's version of "now", as indicated in Ricardo's congestion charge report. As a starting point for considering the impact of the congestion charge on pollution, Ricardo's modelled numbers contained in its report are – to be polite – less than ideal.

14. We have already repeatedly challenged Oxfordshire County Council to explain these discrepancies, including at public council meetings. The explanation offered by Councillor Andrew Gant, the cabinet member for transport management, that "Differences between the "DM-BR" estimates and the city council's latest published data are to be expected", and that "air quality is strongly influenced by numerous factors including weather and fleet changes, as well as by traffic flows"[60] indicates to us that Oxfordshire County Council may be unaware of just how large the discrepancies recorded reality and Ricardo's modelled version of that reality are. Discrepancies peak at 56% at Wolvercote Meadows (where Ricardo overestimates 2024 reality), but also on Hollow Way, where they underestimate 2024 reality by 34%.

15. Numerically, in a typical year, the weather may account for 1-2 μg/m^3 of variance in recorded NO2 pollution numbers. Our analysis shows far higher variances than this, and in either direction – both overestimation and underestimation of reality. In light of this, we take issue with Councillor Gant's assertion that: "the methodology is entirely appropriate for this central purpose."

[56] Ricardo. Oxford Source Apportionment Study. February 2025. Available here.
[57] Ricardo. New Oxfordshire wide air quality website launched. 18 September 2023. Available here.
[58] Oxford City Council. Air pollution levels in Oxford are continuing to improve, new data from Oxford City Council has found. 19 June 2025. Available here.
[59] Oxford City Council. Air Quality Annual Status Report 2024. Available here.
[60] Oxfordshire County Council. Councillor Gant response to Richard Parnham, County Council, 8 July 2025. Response on file with report author.

Table 2.1: Comparing modelled "do minimum" NO2 pollution data with recorded 2024 NO2 pollution data

Chart 1 - COMPARISON OF RICARDO JUNE 25 DATA v CITY 2024 AQSR DATA REPORT PUBLISHED JUNE 25					
Site Ref	Location	OCC DATA 2024	RICARDO OPTION 2	Difference	%age
DT55	St Clements	34	40.1	(6.10)	18%
DT45	Worcester Street	25	29.8	(4.80)	19%
DT85	St Clements(3)	25	32.0	(7.00)	28%
DT18	London Road /BHF (Roundway)	19	22.1	(3.10)	16%
DT3	LP52 Abingdon Road	23	23.8	(0.80)	3%
DT44	Hythe Bridge Street	18	19.0	(1.00)	6%
DT58	Folly Bridge	20	21.5	(1.50)	8%
DT59	Thames Street	15	19.9	(4.90)	33%
DT60	New Butterwyke / Thames Street	17	18.8	(1.80)	11%
TF31	Brasenose Farm / Eastern Bypass	32	31.6	0.40	-1%
TF30	99 Oliver Road / Eastern bypass	24	25.5	(1.50)	6%
DT83	A44 Woodstock Road	28	26.1	1.90	-7%
TF6	306 Woodstock Road	13	17.3	(4.30)	33%
DT56	High Street	25	18.6	6.40	-26%
DT57	Speedwell Street / St Aldates	21	18.3	2.70	-13%
TF15	Park End Street	21	17.1	3.90	-19%
DT43	Park End Street	19	15.7	3.30	-17%
DT42	New Road	16	13.2	2.80	-18%
DT40	Queen Street	17	12.9	4.10	-24%
DT80	Hollow Way	29	19.1	9.90	-34%
DT93	Marston Ferry Road	10	14.5	(4.50)	45%
TF24	Marston Ferry Road/ Cherwell Drive	11	14.4	(3.40)	31%
TF37	Wolvercote Meadows (2)	24	37.5	(13.50)	56%
TF36	Wolvercote Meadows (1)	31	31.2	(0.20)	1%
TF35	67 Southern Bypass Road	NL	NL	NL	NL - Not listed
TF27	Northern By Pass - Phillips Tyres	29	21.6	7.40	-26%
DT17	23 Iffley Road / Stanley Road	NL	NL	NL	NL - Not listed
TF25	39 Marsh Lane	13	18.3	(5.30)	41%
TF8	191 Woodstock Road	16	17.4	(1.40)	9%
TF7	339 Banbury Road	20	15.2	4.80	-24%
TF33	119 Barns Road	13	15.1	(2.10)	16%
TF18	143 Morrell Avenue	12	14.2	(2.20)	18%
TF10	99 Banbury Road	16	14.2	1.80	-11%
LT12	Ruskin Hall	NL	NL	NL	NL - Not listed
LT4	138- 146 Morrell Avenue	10	13.6	(3.60)	36%
DT82	Summertown Parade	16	13.4	2.60	-16%
TF20	Marston Road / St Michaels Primary	10	13.6	(3.60)	36%
DT90	Rose Hill / Ashurst Way	14	13.0	1.00	-7%
TF23	JR Hospital	17	11.8	5.20	-31%

16. We now move on to traffic data. Here, a complicating factor is that published annual daily traffic typically counts two-way traffic, i.e. both carriageways, on a typical urban road. By contrast, the Ricardo report focuses on traffic on one lane only. For that reason, we understand that we should not seek to compare freely available AADTs for 2024[61] and expect them to match Ricardo's numbers, which are intended to reflect current reality. As a very rough approximation, publicly available AADT numbers should be double the Ricardo numbers. Generally, they are not. They are often not even close. We invite Oxfordshire County Council to examine the data that underlies this modelling. While they are doing so, they may wish to enquire why deploying a congestion charge will prompt a very large increase in the use of "C1" class goods vehicles within Oxford, one of the data's unpublished projections. This includes a projected 995% increase in the use of such vehicles on Iffley Road, a 1,086% increase on Marston Ferry Road, a 1,319% increase on Hollow Way, and a 1,544% increase on Woodstock Road.

17. As we studied Ricardo's data tables, more oddities became apparent. St Cross Road, a proposed congestion charge site, does not feature on the main data tables. This means we could not compare the before and after traffic levels on this crucial evaluation location. This is despite the road having a traffic and pollution monitor along its length. Next, we noticed that Garsington Road – a road that Steer had flagged up as likely to experience an increase in traffic flows as result of the £5 charge being introduced – was also not included. This road too has both a traffic and pollution monitor on it. We observed that Ashhurst Way, a suburban side road in Rose Hill was mentioned, but the adjacent Rose Hill – a main road out of Cowley to the ring road – was not. There are permanent traffic and pollution monitors on Rose Hill but not, we believe permanent traffic monitors on Ashhurst Way.

18. Out of exasperation with these notable omissions, we made an Environmental Information Regulations request[62] (EIR 25762), with the aim of obtaining these missing numbers. The information provided by Oxfordshire County Council did not identify the roads the data related to – except by the "nearest link road", which were able to cross-reference with the Ricardo report to identify which road was which, for these roads only. This enquiry is ongoing. We understand that the data we now have in our possession is common to both Steer and Ricardo.

19. As we reviewed this data, we were surprised to discover that impacts on road speeds had been modelled but not later published. Given that one of the purposes of the congestion charge is to speed up bus journey times, one might have thought this was a metric worth sharing. Or perhaps not, if the data indicated that the proposal would make no difference whatsoever to various roads evaluated. In the name of transparency, therefore, we publish what we believe is a "do nothing" / "do £5 congestion charge comparison" – assuming we have compared the right roads with the right roads, where we believe we have been able to reconcile the road identities. We invite feedback from Oxfordshire County Council if we are mistaken. For reference, "do nothing" is marked in green, "do something" in pink.

[61] Available here.
[62] Available here.

Table 2.2: do nothing versus do something – predicted impacts on road speeds

	AADT24 (veh/day)	AM Peak 0800 - 0900 Flow (Vehicles/hour)		IP Peak Average 1000 - 1600 Flow (Vehicles/hour)		PM Peak 1700 - 1800 Flow (Vehicles/hour)		verage 1900 -
	Congested speed (kph)	Congested speed (kph)	Free flow speed (kph)	Congested speed (kph)	Free flow speed (kph)	Congested speed (kph)	Free flow speed (kph)	Free flow speed (kph)
Marston Ferry Rd	35.95	36.03	40.00	36.10	40.00	35.63	40.00	40.00
Marston Ferry Rd	36.13	36.02	40.00	36.20	40.00	35.78	40.00	40.00
	0%	0%	0%	0%	0%	0%	0%	0%
Ruskin Hall	35.61	35.62	40.00	35.59	40.00	35.64	40.00	40.00
Ruskin Hall	35.59	35.58	40.00	35.59	40.00	35.61	40.00	40.00
	0%	0%	0%	0%	0%	0%	0%	0%
Hollow Way	16.45	16.71	40.00	16.63	40.00	15.87	40.00	40.00
Hollow Way	16.31	16.19	40.00	16.52	40.00	15.91	40.00	40.00
	-1%	-3%	0%	-1%	0%	0%	0%	0%
JR Hospital ...and Barnes Road!	39.40	39.33	40.00	39.46	40.00	39.35	40.00	40.00
JR Hospital ...and Barnes Road!	39.32	39.19	40.00	39.44	40.00	39.17	40.00	40.00
	0%	0%	0%	0%	0%	0%	0%	0%
Iffley Road	39.21	39.38	40.00	39.31	40.00	38.97	40.00	40.00
Iffley Road	39.07	39.17	40.00	39.17	40.00	38.89	40.00	40.00
	30%	31%	0%	31%	0%	30%	0%	0%
99 Oliver Road (Eastern Bypass)	75.44	74.16	80.00	76.46	80.00	74.89	80.00	80.00
99 Oliver Road (Eastern Bypass)	74.37	72.73	80.00	76.06	80.00	73.23	80.00	80.00
	-1%	-2%	0%	-1%	0%	-2%	0%	0%
191 Woodstock Road	25.33	24.10	40.00	26.50	40.00	23.53	40.00	40.00
191 Woodstock Road	25.04	24.12	40.00	26.17	40.00	23.15	40.00	40.00
	-1%	0%	0%	-1%	0%	-2%	0%	0%
23 Iffley Rd/Stanley Rd	40.00	40.00	40.00	40.00	40.00	40.00	40.00	40.00
23 Iffley Rd/Stanley Rd	40.00	40.00	40.00	40.00	40.00	40.00	40.00	40.00
	0%	0%	0%	0%	0%	0%	0%	0%
St Clements 3	12.64	11.14	40.00	13.45	40.00	12.53	40.00	40.00
St Clements 3	14.42	13.93	40.00	14.97	40.00	13.95	40.00	40.00
	14%	25%	0%	11%	0%	11%	0%	0%
A44 Woodstock Rd.	48.00	48.00	48.00	48.00	48.00	48.00	48.00	48.00
A44 Woodstock Rd.	48.00	48.00	48.00	48.00	48.00	48.00	48.00	48.00
	0%	0%	0%	0%	0%	0%	0%	0%

Conclusions

20. Even taking the findings of Ricardo and Steer's reports at face value, it is clear that the congestion charge creates winners and losers. If the modelling is correct, there would be some notable winners of this scheme, in terms of traffic flow reduction, such as for the residents of Iffley Road and St Clement's. But many of the winners also appear to be free-flowing roads, which are already empty for much of the year. The difference in predicted outcome of Marston Ferry Road (mostly, a country road) and Oliver Road (a residential road, adjacent to the ring road) is stark. Marston Ferry Road mostly wins, Oliver Road entirely loses.

21. We say "if the modelling is correct" as an important qualification. We stress, once again, that we are not modelling experts. But we can tell when something is potentially amiss or, at the very least, requires considerable explanation. And it does not take an expert to notice when modelling data appears in the raw analysis but does not make the final cut of a report – i.e. road speed numbers. We believe we are owed an explanation for why these figures were not published as part of the consultation process.

Chapter 3: What are the actual causes of traffic and congestion in Oxford – and how might they be addressed?

Overview

1. We have already established that, with the notable (part-time) exception of the Iffley Road, there is typically little congestion in Oxford's centre. Several of the traffic filter sites have no congestion at most times of the day, most days. Those that do are for specific periods on specific days. The justification for introducing congestion charge checkpoints in the non-congested city centre is therefore extremely thin – especially as all four central Oxford ANPR checkpoints are due to operate 7am – 7pm, seven days per week, 365 days per year.

2. By contrast, there is longstanding evidence to indicate that congestion and resulting delays tend to occur in the outer parts[63] of Oxford, often in locations that are not the focus for OCC's planned congestion charge ANPR charging regime. This reinforces our view that the proposed scheme is not only deeply irrational, but it is also practically bound to fail. Worse, the scheme is likely to increase traffic, congestion and pollution in the city's outer edges. There is, therefore, a significant risk that this scheme will actively cause harm in the northern and eastern parts of Oxford.

3. The evidence we have used to reach this conclusion includes Google traffic maps, Oxfordshire County Council traffic monitoring locations[64], existing data sources, direct observations at various times of the day – most of which have been filmed and shared online – together with modelling data supplied by Steer and Ricardo.

4. Based on these data sources, our provisional finding is that there are three main sources of congestion in certain parts of Oxford – albeit typically not for all of the year, and certainly not for the majority of the day:
   - Oxford's two main hospitals – the John Radcliffe and Churchill;
   - Private, not state, schools;
   - Recently introduced low traffic neighbourhoods (LTNs).

5. Below, we set out the evidence which has helped us identify each source of likely congestion. We also set out how the congestion charge scheme is, in all likelihood, predicted to have either no effect on congestion or, in a worst-case scenario, actively make it worse. In light of this, we propose what we believe are viable alternative solutions to reduce congestion in outer Oxford, based on available evidence.

[63] Oxfordshire County Council. Oxford Transport Strategy – Connecting Oxfordshire. Available here.
[64] Available here.

The role of Oxford's major hospitals in causing (highly localised) congestion

6. Oxford's two main hospitals are located in the city's outer suburbs: Northway / Headington in the case of The John Radcliffe, and Headington / Wood Farm in the case of the Churchill. The trust that runs both hospitals, the Oxford University Hospitals NHS Foundation Trust, employs in excess of 16,000 staff, making it one of the largest (and most concentrated) employers in the city, just behind Oxford University[65]. This is also far ahead of major private sector employers, such as BMW's Mini factory, which is believed to have around 3,500 employees[66]. Between them, Oxford's hospitals also have more than 1.7 million inpatient and outpatient visits per year. This will also contribute significantly to the city's traffic and congestion levels[67].

7. As the trust running the hospital itself acknowledges, Oxford's hospitals generate a significant amount of traffic in Oxford. According to a staff survey, more than 61% of staff travel to work alone by car, with a further 6% sharing a car. This compares with just 12% who catch the bus, 8% who walk and 8% who cycle[68].

8. The trust estimates that 74,524 vehicles each week travel to, and from, its John Radcliffe Hospital site. Given weekends are quieter than weekdays, we estimate that it probably splits into 13,000 vehicles per working day, with 5,000 vehicles per day at the weekend. Indeed, at a large scale, the trust estimates that around 14% of all traffic on the city's ring road is coming from, or going to, its Headington-based hospitals. With 80% of staff living outside the city's ring road[69], Oxfordshire County Council's normal mantra of cycling and walking as a way to reduce congestion is unlikely to hold much sway – especially for a workforce where shifts in high-pressure departments can last 12.5 hours, typically covering anti-social hours[70].

9. Yet, despite the clear impact of these vital public services on Oxford's traffic volumes and resulting congestion, it is notable that Oxfordshire County Council's congestion charge plans barely mention them. We think this is a significant omission, and fundamentally challenges the credibility of the council's plans. We discuss the role of hospitals in generating traffic and congestion in considerable more detail in chapter four, below.

10. As a result of this apparent gap in Oxfordshire County Council's understanding of traffic and congestion, it appears that its previously-mentioned vehicle reduction targets operate on the assumption that vehicle movements around the city are highly elastic, and can easily be affected by policy interventions such as a congestion charge or traffic filters. The evidence presented in this report indicates that this is not the case – especially in relation to Oxford's

[65] Oxford University. Annual staffing data 2023 / 2024 reporting year. Available here.
[66] https://www.oxfordmail.co.uk/news/25140282.bmw-axes-180-workers-jobs-lost-oxford-mini-plant/
[67] Oxford University Hospitals NHS Foundation Trust. Annual Report and Accounts 2023 – 2024. Available here
[68] Oxford University Hospitals NHS Foundation Trust. Healthy Travel Strategy: 2025 – 2027, A framework for travel strategy for the John Radcliffe. Acting CEO's forward. Available here.
[69] Oxford University Hospitals NHS Foundation Trust. As above.
[70] Oxford University Hospitals NHS Foundation Trust. Welcome to the John Radcliffe Emergency department. Available here.

hospitals. The evidence we present below indicates that a significant majority of hospital staff are resistant to any form of modal shift, for perfectly valid reasons. Likewise, expecting a significant percentage of 1.7 million inpatient and outpatient visits per year to evaporate is, unambiguously, wishful thinking – or not thinking at all – by Oxfordshire County Council.

11. Modal shift will only occur if better options to the private car are in place. From its congestion charge consultation documentation, there is no sign from Oxfordshire County Council that it has a strategy for ensuring that modal shift will occur, beyond simply inhibiting access to several of Oxford's key arterial roads – possibly because the council barely acknowledges the importance of the hospitals in traffic and congestion generation in and around Oxford.

12. Worse, while outlines of credible plans exist (not of the council's own making) to reduce traffic and congestion caused by Oxford's hospitals, there is also plausible evidence Oxfordshire County Council's congestion charge scheme will make traffic and congestion worse on the main approach roads to the John Radcliffe, in particular. We fear this will cause significant inconvenience – potentially even harm – to NHS personnel, patients and nearby residents.

13. Below, we set out how we believe the Marston Ferry Road traffic filter, in particular, will make the congestion situation worse around the John Radcliffe. We also make a number of alternative proposals to improve the situation, building on proposals already made by the NHS trust and others. For completeness, we also indicate the role played by the Churchill Hospital in causing minor, localised congestion.

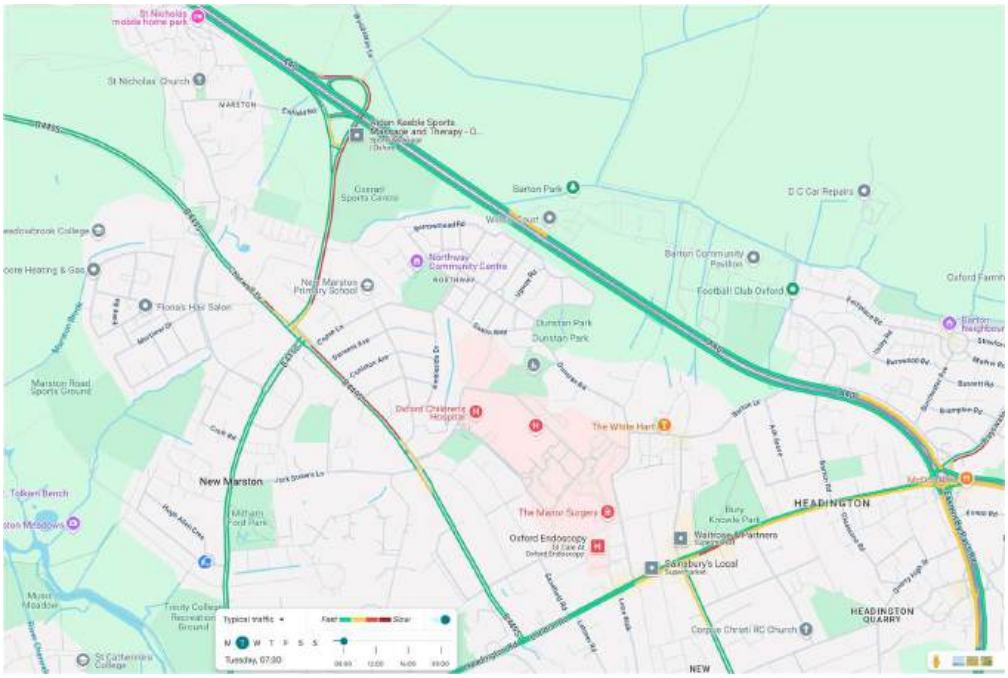
Example one: the John Radcliffe Hospital

14. Illustration 3.1 shows the level of congestion build-up close to the John Radcliffe Hospital at 7:30am on a typical Tuesday, from two main directions – Marsh Lane in Marston, near the Oxsrad Sports Centre, and London Road in Headington. The time selected in picking this example is based on-the-ground observations regarding the busyness of roads in Oxford. This timing also allows for the discounting of other factors likely to cause congestion – notably the school run.

15. In relation to Marsh Lane, which is a residential road for approximately half its length, congestion often builds up almost as far back as the A40 ring road[71]. Congestion on London Road, Headington, is somewhat lighter – but constant in some form throughout the day and still some of the heaviest in the wider area, especially around the main shopping district. An additional congestion hotspot at peak commuting times also exists on the B4495 (Headley Way). Headley Way is a residential road that connects Marsh Lane in Marston with London Road and Headington. This road is also the main entrance to the John Radcliffe Hospital.

[71] https://x.com/ReconnectingOx/status/1947906532600869245

Illustration 3.1: congestion build up around the John Radcliffe Hospital

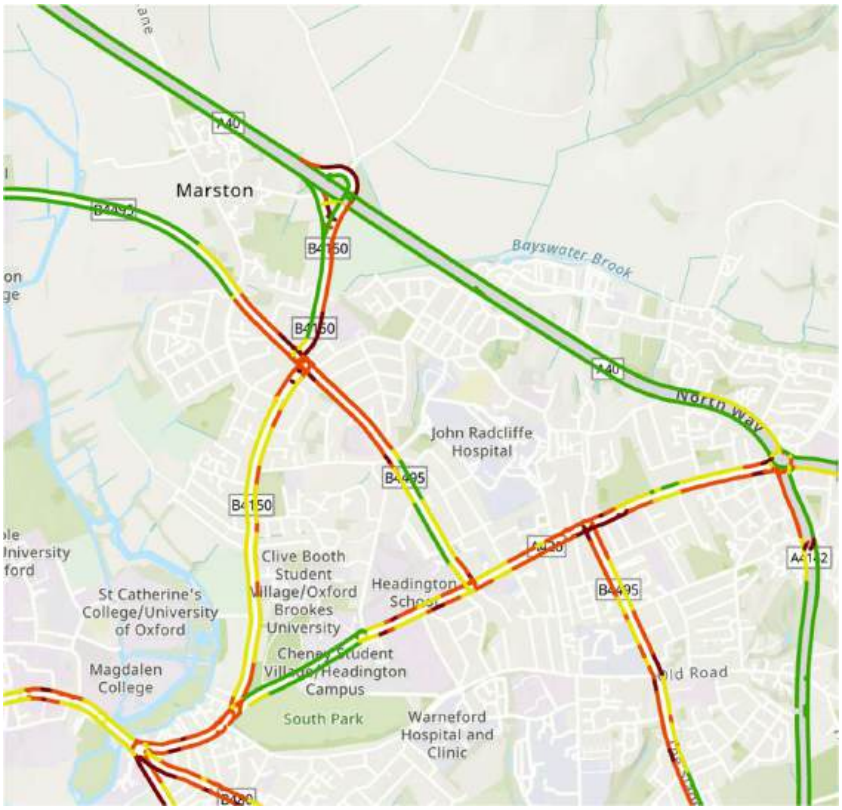


16. Another noticeable feature indicated on illustration 3.1 above is the lack of congestion beyond Marsh Lane in Marston, either along Cherwell Drive toward Marston Ferry Road[72] or along Marston Road, heading into the city centre. Likewise, congestion also largely evaporates in Headington beyond the B4495 turnoff towards the John Radcliffe, with traffic flowing freely down Headington Road[73] (Headington Hill)[74] into the city centre[75]. Marston Ferry Road is, of course, one of the six planned congestion charge ANPR sites, notwithstanding its lack of congestion during its proposed hours of operation (7am – 9am, 3pm – 6pm, Monday to Saturday). Similarly, Headington Hill is one of the main approach roads to the proposed St Clement's ANRP congestion charge site.

17. Notably, the congestion mapping indicated above is not a quirk of sampling, yielded by selecting congestion levels in the area at a specific time, on a certain day. Data released by Oxfordshire County Council[76] under a freedom of information request shows a largely similar picture, when average weekday term time traffic levels are calculated between 7:30 and 9:30 throughout the course of 2024. As with the narrative described above, congestion around the John Radcliffe Hospital is highly concentrated on its main approach roads along Marsh Lane / Headley Way from the North and London Road / Headley Way from the east. After that point, congestion all but evaporates, west along Marston Ferry Road, and south along Marston Road and Headington Hill.

[72] https://x.com/ReconnectingOx/status/1932738608965804236
[73] https://x.com/ReconnectingOx/status/1934536252289687612
[74] https://x.com/ReconnectingOx/status/1941443251212607774
[75] https://x.com/ReconnectingOx/status/1939592902243434942
[76] Available here.

Illustration 3.2: average weekday term-time traffic speeds, 7:30 – 9:30am, 2024

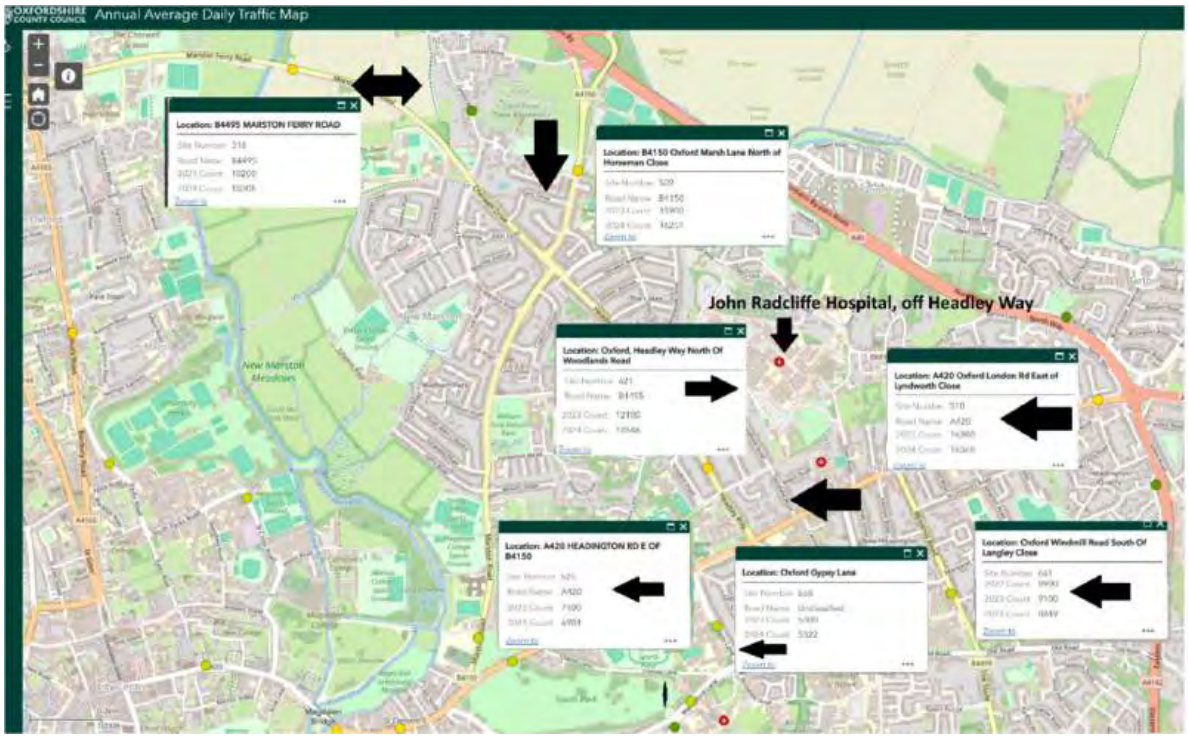


18. A similar picture emerges if one studies recorded annual average daily traffic (AADT) counts, which are available on Oxfordshire County Council's interactive map[77]. As illustration 3.3 below shows, traffic levels fall off significantly between London Road (close to the entrance to the city at the ring road) and Headington Road (Headington Hill), falling from 16,360 on London Road to just 6,904 on Headington Hill. By contrast, traffic levels are largely maintained along Headley Way (14,546) towards the John Radcliffe, with relatively little traffic disappearing off London Road towards Oxford Brookes University off Gypsy Lane (5,322) or towards the Churchill Hospital on Old Road via Windmill Lane (8,849). Likewise, there is a notable drop in AADTs between Marsh Lane (16,251) and Marston Ferry Road (10,205).

19. This behaviour is (more or less) replicated at the junction of London Road and Headley Way. It can also be verified via observation, with a large percentage of traffic either turning right into Headley Way towards the John Radcliffe or turning out of Headley Way onto London Road, heading out towards the ring road during the morning rush hour[78].

[77] Available here.
[78] https://x.com/ReconnectingOx/status/1940308086478315778/video/3

Illustration 3.3: AADTs near the John Radcliffe Hospital and Marston Ferry Road



20. Direct observations also reveal – particularly on Marsh Lane, which is narrow towards the Cherwell Drive turning – a very large number of vehicle occupants wearing NHS scrubs and ID badges on NHS lanyards, especially during the 6:45am – 7:30am morning rush hour period. After this time, there is a shift towards car occupants wearing a greater range of clothes – possibly as NHS staff arriving for work gives way to patients visiting the hospital. However, even then, there is a strong tendency for vehicles to turn left towards the John Radcliffe, rather than right towards Marston Ferry Road[79].

21. Finally in relation to this location, it is also worth noting that (albeit very modest) Oxford-bound congestion on Marsh Lane remains high until relatively late in the day – first becoming partially clear around 4:30pm. Around this time, there is also notable increase in (very modest) congestion heading outbound from Cherwell Drive towards the A40 ring road via Marsh Lane. We presume this traffic reflects the end of the school day the nearby Swan School and Meadow Brook College.

22. Elsewhere in this part of Oxford, congestion can also be observed near to the outbound section of London Road, close to the ring road. It is our strong assumption that a significant element of this traffic is likely to be caused by either staff or patients heading away from the John Radcliffe hospital at the end of the working day. Indeed, evidence collected by the John Radcliffe hospital itself[80] – shown in illustration 3.5 – tends to support this proposition. We return to this topic in chapter four.

[79] https://x.com/ReconnectingOx/status/1940351659995209996
[80] Oxford University Hospitals NHS Foundation Trust. Healthy Travel Strategy: 2025 – 2027, A framework for travel strategy for the John Radcliffe. Acting CEO's forward. Available here.

Illustration 3.4 congestion at 16:25 around Marston, Northway and Headington

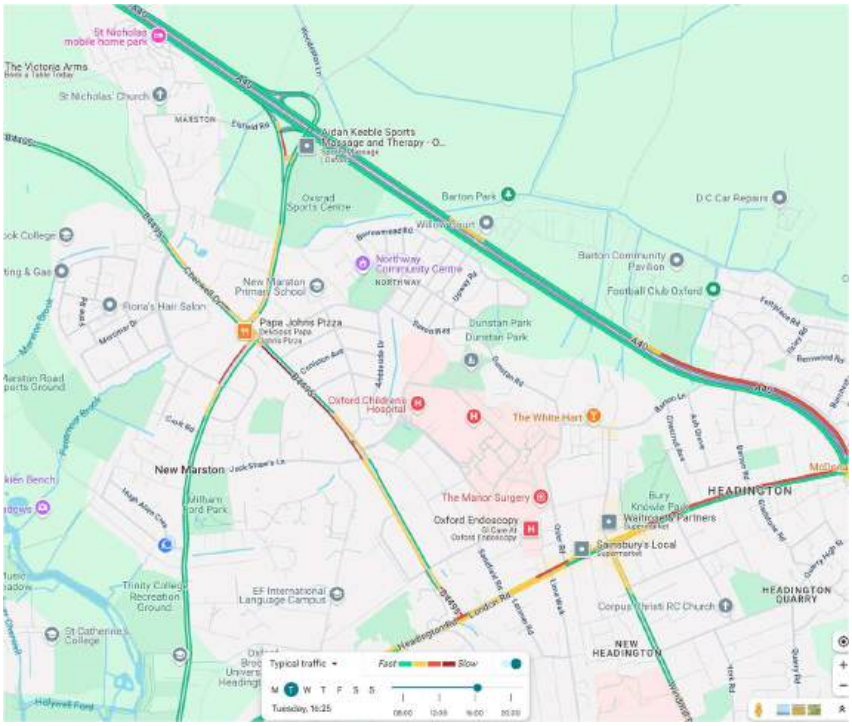
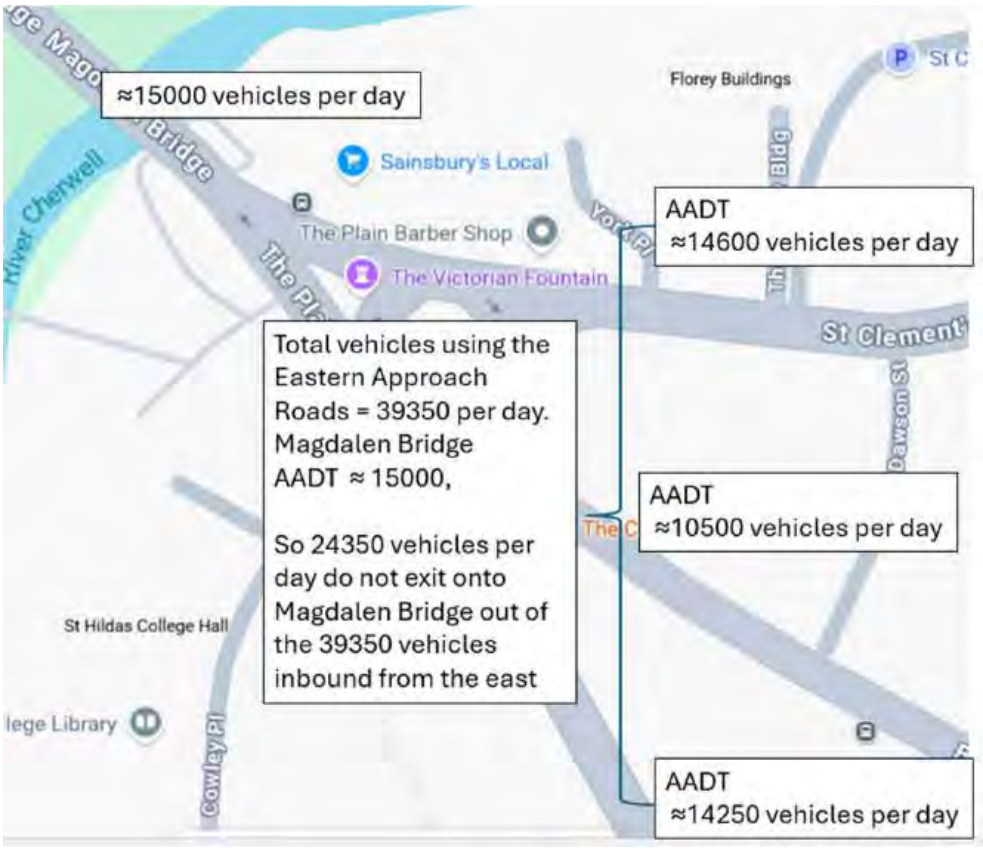


Illustration 3.5: staff entrants and exits from the John Radcliffe Hospital

23. Another unexplained quirk in traffic that is likely to be hospital-related is that the main flow of traffic around the Plain roundabout circulates around Iffley Road, Cowley Road and St Clement's, but does not then cross into the city via Magdalen Bridge.

Illustration 3.6: average daily vehicle movements around the Plain



24. A likely explanation for this traffic flow is Google Maps. On many occasions, Google Maps suggests the best route to take from the south of Oxford – for example, Abingdon – to the John Radcliffe is via Iffley Road and the Plain, and then onwards up Headington Hill.

25. As we shall explain in more detail shortly, the introduction of the LTNs in East Oxford pushed various types of drivers into this one route, concentrating on Iffley Road and the Plain roundabout. Before the LTNs, some hospital-bound traffic – especially local residents with local knowledge – would have filtered between the Iffley and Cowley Roads, notably via Divinity Road. However, once the East Oxford LTNs were introduced, these alternative routes were cut off. Increased traffic on so-called boundary roads is a well-known consequence of LTNs. However, the combination of hospital and private school traffic on this route – which is also a bus route – have significantly magnified congestion problems in this area – a fact that Oxfordshire County Council not only fails to recognise, but actively rebuffs.

Illustration 3.7: Google Maps routing to the John Radcliffe from Abingdon

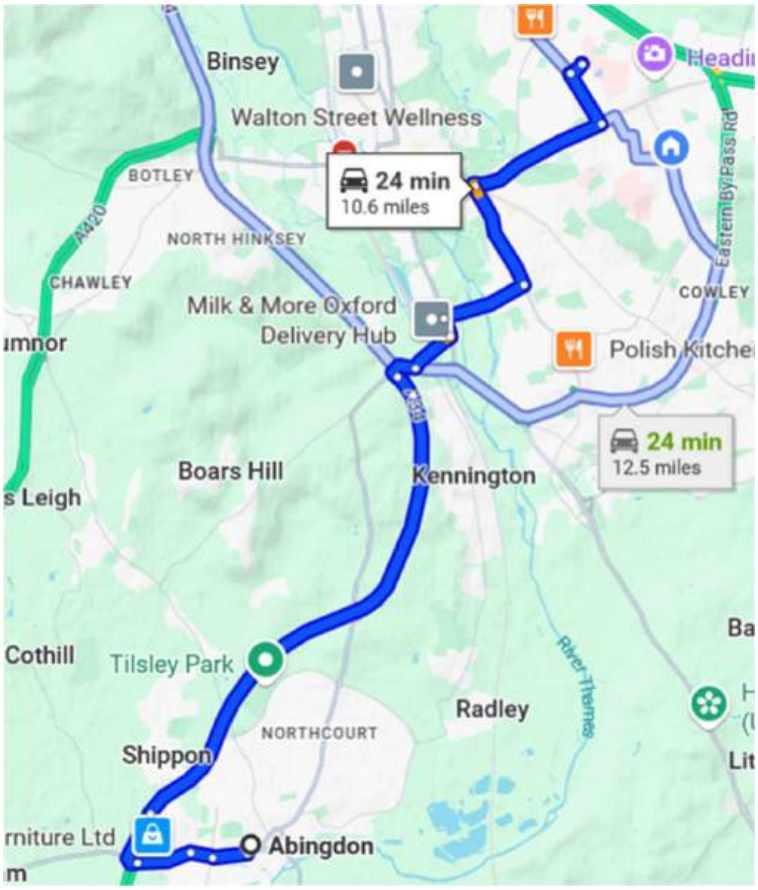


Illustration 3.8: Pre-LTN traffic flows from the Abingdon Road roundabout and Iffley Road to the Headington hospitals

Illustration 3.9: Post LTN traffic flows from the Abingdon Road roundabout and Iffley Road to the Headington Hospitals

26. Although the routing shown above indicates a high concentration of traffic heading towards the Plain along Iffley Road, one of the surprising things about this traffic is how quickly it dissipates once it passes the Plain. We have observed, and Google Map traffic data largely verifies, that traffic often flows freely in the mornings at St Clements, especially in a Headington-bound direction. We can illustrate this via drawing on Google Map's congestion data, exploring typical levels of traffic at specific times of day. The evidence is unambiguous. There is little traffic on St Clement's for much of the day in the direction of Headington, especially in the early mornings. In other words, there is very little traffic whatsoever on this outbound road, except that which is waiting at traffic lights. St Clement's is, of course, one of the six proposed congestion charge sites – despite having little outbound congestion at all, let alone sufficient congestion on it to warrant a 7am to 7pm congestion charge timing.

Table 3.1: Google Map congestion data for St Clement's – outbound towards Headington

	St Clements West to East											
Monday			33					19				
Tuesday			33					75				
Wednesday			19				33	19				
Thursday			19				33	75	19			
Friday						M	19	19	19			
Saturday						35	33					
Sunday												
	* all times shown are shown as seconds											

27. Taken in the round, the evidence presented above provides further support for one of our key hypotheses about congestion in Oxford: it is rarely caused by residents moving around their own city. Rather, it is caused by cross-city flows and short-distance infractions into the city's outer edges, by car drivers from outside Oxford who tend not to proceed to the city centre.

28. Further evidence to support this assertion can be verified by observation, also carried out during the morning rush hour[81] – including in the time immediately leading up to the John Radcliffe 7:30am shift change[82]. Video footage collected at both the Marsh Lane / Cherwell Drive / Headley Way interchange shows that, overwhelmingly, traffic turns left onto Cherwell Drive towards the hospital. Additional video evidence, collected a few minutes later[83], reveals a similar pattern: most vehicles that travel up Cherwell Drive at this time in the morning can then be observed turning left again into the John Radcliffe hospital entrance[84]. This traffic flow can be observed occurring on multiple morning rush hours[85].

29. For completeness, we also captured evidence immediately before, and on the first day of, the recent doctors' strike. To minimise the likelihood of other outside influences, the "before" data was captured the day after Oxford's state schools broke up for the summer holidays. The difference was stark: queues far out of the city before the strike[86], on the first day of the school holidays. On the first day of the strike, we observed a complete absence of queuing traffic in the exact same location[87].

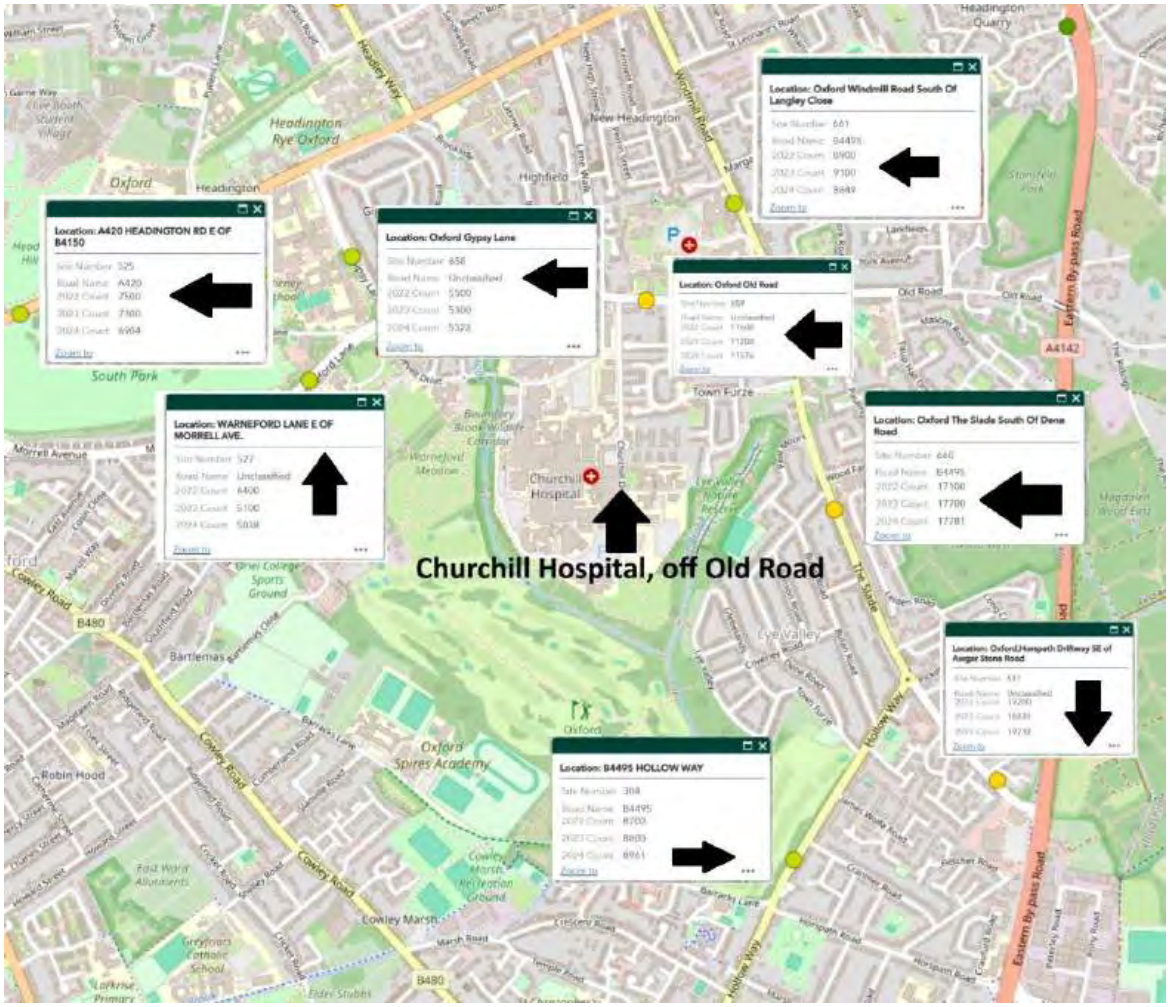
Example two: the Churchill Hospital

30. A broadly similar picture of peak time morning congestion can also be observed in relation to the Churchill Hospital, based on Old Road. Due to its positioning – the hospital backs onto a golf course – there are just four main approach roads to the Churchill: from the Eastern Bypass (i.e. ring road) along Horspath Driftway and the Slade; along Hollow Way, also via the Slade, both from the south; via Windmill Road (off London Road) from the north; or via Gypsy Lane or Warneford Lane from the west (i.e. Oxford city centre). There is little access from the east: Old Road ends in a country park.

31. As with London Road / Headley Way, average daily traffic counts are highest in suburban Oxford roads in close proximity to the ring road, notably Horspath Driftway (AADT: 19,232) and the Slade (17,781). However, these AADTs fall away sharply once they pass the entrance to the Churchill Hospital (11,567) and become closer to the city centre. Gypsey Road, a short distance to the West of the Churchill entrance, for example, has an AADT of just 5,322, while Warneford Lane has an AADT of 5,038 and Headington Hill has an AADT of 6,904. Anyone who observes these roads during the peak time morning rush hour, especially Headington Hill, will typically find them very quiet[88], even during term time[89].

[81] https://x.com/ReconnectingOx/status/1942477610618863903
[82] https://x.com/ReconnectingOx/status/1945730017763246432
[83] https://x.com/ReconnectingOx/status/1941443251212607774
[84] https://x.com/ReconnectingOx/status/1941443251212607774
[85] https://x.com/ReconnectingOx/status/1942477610618863903
[86] https://x.com/ReconnectingOx/status/1947906532600869245
[87] https://x.com/ReconnectingOx/status/1948626368012358023
[88] https://x.com/ReconnectingOx/status/1941443251212607774
[89] https://x.com/ReconnectingOx/status/1939592902243434942

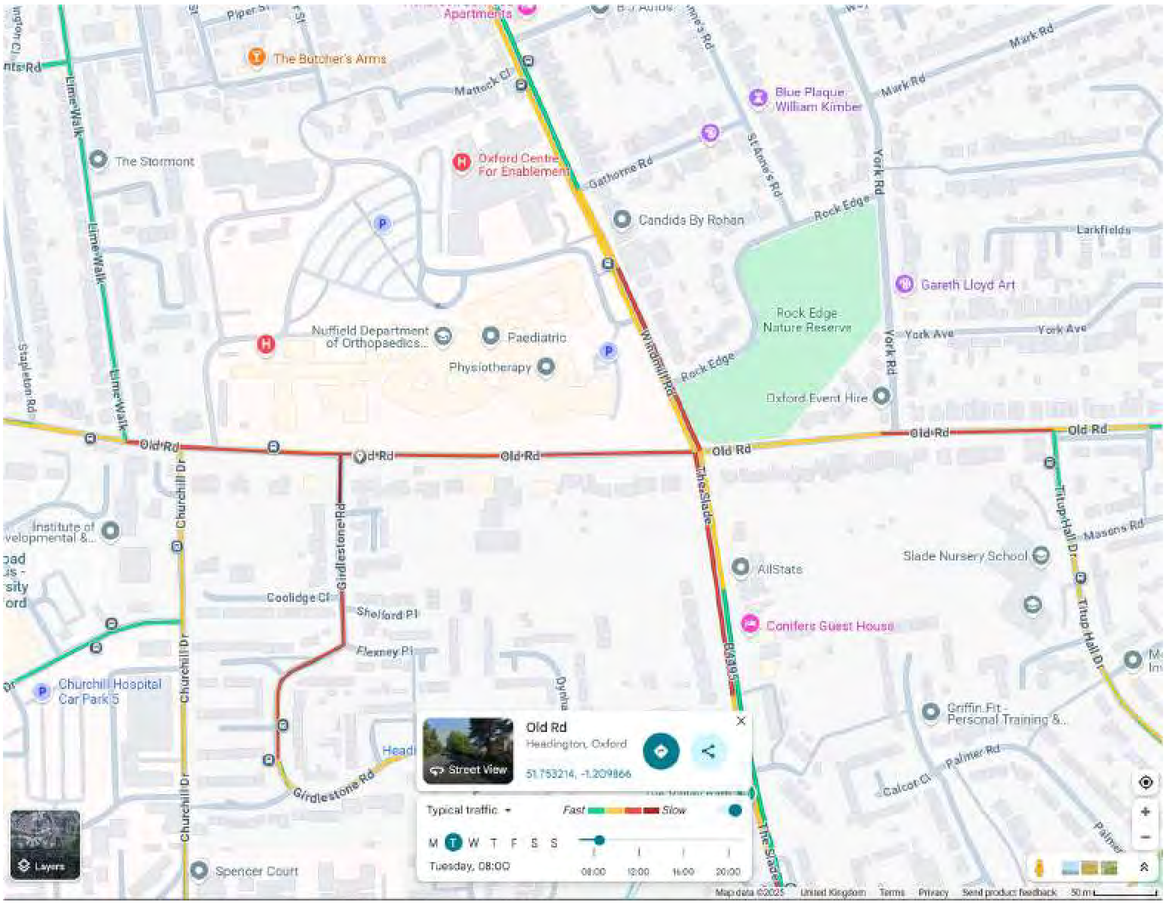
Illustration 3.10: AADTs near the Churchill Hospital and Hollow Way



32. In sharp contrast, congestion around the entrance to the Churchill Hospital is typically acute, and notably worse than can be observed at several proposed central congestion charge locations, further indicating the fundamental irrationality of their selection.

33. That said, we make an important qualification regarding "how bad is bad?", even in congestion hotspots such as this. Using the H2 bus timetable as a proxy for journey time congestion impact, we can state that the timetabled journey time to the Churchill Hospital is consistently allocated four minutes to travel between the Nuffield Orthopaedic centre (shown below on the map below) and into the grounds of the Churchill hospital itself (i.e. Roosevelt Drive, accessed of Churchill Drive) – i.e. the whole congested area shown below. While we cannot vouch for the accuracy of this timetabling, our working assumption must be that it is close to on-the-ground reality.

Illustration 3.11: congestion near the Churchill Hospital, 8:00 on a typical Tuesday



Steer / Ricardo modelling predictions for this area

34. In light of the pre-existing congestion in close proximity to both the John Radcliffe and Churchill Hospitals, it might be reasonable to assume that Oxford's planned congestion charge would be likely to alleviate this congestion. However, the likely impact, as indicated by traffic modelling by Steer and AtkinsRéalis using the Oxfordshire Strategic Model and pollution modelling by Ricardo Consulting – is "mixed", to say the least. In Marston, vehicle volumes are predicted to increase on the already-congested Marsh Lane by a daily average of 352 (4.6%). Meanwhile, the already free-flowing Marston Ferry Road is expected to see a daily average decrease in traffic of 645 vehicles, a fall of 15.4%. It is not entirely clear how it advantageous it is to anyone of a quiet country road (Marston Ferry Road) gets even quieter, at the expense of an already busy suburban road (Marsh Lane).

35. There is a slightly more positive predicted outcome on London Road, where average daily traffic volumes are predicted to fall by 1,290 per day (8.3%). It is not entirely clear what is driving this improvement, given that London Road is more than a mile from the nearest congestion charge ANPR sites, at either St Clements or Hollow Way. It is also not clear what impact the congestion charge scheme is likely to have on the roads surrounding the Churchill Hospital. Several key roads in the area are notably absent from the Ricardo

evaluation table, including Horspath Driftway, the Slade, Windmill Road and Old Road itself. For that reason, we cannot say with much clarity whether the ANPR camera will cause more, or less, congestion in this specific congestion hotspot. This is not an ideal scenario, given that Oxfordshire County Council is seeking to reduce congestion in Oxford, drawing on findings contained in the Ricardo report while doing so.

36. Further afield, the Steer / Ricardo modelling indicates a series of outcomes, none of which are likely to be beneficial for those seeking to access the hospital, either as employees or patients. For inbound staff, who will not be issued with any commuting permits under the proposed scheme, any additional traffic and congestion is likely to impact their journey into work by car. Moreover, the Ricardo model expressly states that such increases are likely to occur, in two locations in close proximity to the John Radcliffe Hospital the Northern Bypass near Phillips Tyres, and the Eastern bypass near both Brasenose Farm and Oliver Road.

37. Conversely, the possibility of 25 permits for Oxfordshire residents and frequent hospital visitor permits create perverse incentives for patients and other visitors to continue to rat run through Oxford city centre rather than use the ring road – especially for visitors from the south, who are already routinely directed down Iffley Road via Donnington Bridge, and onwards to the John Radcliffe via St Clements and Headington Hill via numerous mapping solutions. With a predicted fall in traffic volumes on Iffley Road, coupled with the right to use a permit to pass through the St Clements ANPR congestion charge filter, it is difficult to conceive of a more counter-productive approach to congestion reduction around the Plain than the one conceived by Oxfordshire County Council.

Conclusions

38. Overall, we believe it is unlikely that Oxfordshire County Council's planned ANPR-based congestion charge scheme will reduce congestion around Oxford's two main hospital sites. Currently, both locations have traffic flows that are among the highest in the city. Both also suffer from peak-time congestion. However, in Marsh Lane in Marston, the modelling suggests that traffic will get worse, on a road that already suffers from peak-time congestion.

39. In light of what we have found, we believe there is a significant case for experimenting with a new express bus service to the John Radcliffe Hospital from the county's park and rides, in particular, potentially making use of the Meaden Hill bus gate near the A40 Northern Bypass (i.e. Oxford's ring road). We explain our thinking on this issue in chapter five.

40. Noting our previous observations about traffic on Iffley Road seemingly routing up St Clements, we have an additional tentative proposal regarding this location, which may help everyone navigating this area: peak time traffic lights on the Plain, specifically intended to ease traffic flow from Iffley Road. As previously discussed, the data we collected suggests that Oxford-bound traffic queuing from both St Clements and Cowley Road is notably shorter in length than inbound traffic from Iffley Road. Prioritising Iffley Road via part-time traffic lights might therefore help ease congestion on Iffley Road without unduly adding to it on St Clements or Cowley Road. At the very least, a short-term, term-time trial of temporary traffic lights may be warranted, to evaluate their effects.

41. Our final suggestion regarding the Plain is based on observation rather than traffic data: that a fair amount of inbound traffic proceeds slowly, to make allowances for cycles heading into the city centre via Iffley Road. Given the extreme width of the pavement outside Magdalen College School, we cannot understand why a segregated cycle lane between Iffley Road and Magdalen Bridge is not in place. Given that the Plain is a cycling accident hotspot, we believe that anything that has the dual benefit of freeing up capacity on the Plain roundabout to ease congestion, while also making cycling safer, should be embraced with gusto.

Illustration 3.12: Room for a segregated cycle lane at the Plain roundabout

The role of Oxford's private schools in causing (highly localised) congestion

42. It is an event that anyone who is familiar with Oxford's traffic situation will instinctively know: the moment the city's private – not state – schools go on holiday, much of Oxford's traffic and congestion (such as it is) instantly disappears[90].

43. Importantly, this is not merely an anecdote: it can be observed, in various different ways – notably, via Google congestion maps and on-the-ground observation. Perhaps the most visible example of this phenomenon is Iffley Road: a road full of slow-moving traffic during the morning rush hour one week[91], but practically free-flowing the next[92] – immediately following the end of several private (not state) school terms.

44. To illustrate this point, table 3.2 below summarises the end of summer term dates for some of Oxford's main private schools, together with their approximate location in Oxford.

[90] https://x.com/ReconnectingOx/status/1928343061630767471
[91] https://x.com/ReconnectingOx/status/1939947119873274232
[92] https://x.com/ReconnectingOx/status/1942118990244892793

Notably, eight of the private schools listed end their summer term in the week starting 30 June, with the most common end of term dates being Friday 4 or Saturday 5 July. This is far earlier than Oxford's state schools, for whom term ends Tuesday 22 July. Because of the significant gap between the end of the private and state school term it is possible to disaggregate the likely impact of congestion caused by both.

Table 3.2: Oxford's main private schools – summer term dates, 2024 - 2025 plus locations

Oxford area	School name	Summer term 2024 - 2025	
		Term starts	Term ends
North	d'Overbroeck's Oxford	28 April 2025	02 July 2025
North	St Edward's School	23 April 2025	28 June 2025
North	Summer Fields School	23 April 2025	05 July 2025
North	Oxford High School	22 April 2025	11 July 2025
North	Wychwood School	02 June 2025	04 July 2025
North	Dragon School	24 April 2025	05 July 2025
Central	New College School	23 April 2025	04 July 2025
Central	Christ Church Cathedral School	23 April 2025	04 July 2025
Central	Magdalen College School	23 April 2025	05 July 2025
East	Headington Rye Oxford	23 April 2025	05 July 2025
East	EF Academy	23 April 2025	14 June 2025

45. To explore this issue further, we collected Google traffic map traffic data on a weekly basis for four weeks, on Friday 4, 11, 18, and 25 July. The significance of these dates is that they encompass the last day of term for several of Oxford's private schools, but also the end of term for Oxford's state schools. To ensure that monitoring was most likely to capture details of the school run, we focused on capturing Google map data as close to 8am as possible.

46. Our findings, collectively shown on illustration 3.13 - 3.14, show a clear correlation between private school term dates and traffic levels: Friday morning traffic largely evaporates between Friday 4 July and 11 July – the key period when most of Oxford's private schools break up. Moreover, broadly the same scenario occurs, irrespective of whether traffic is monitored in North Oxford or Central Oxford. By contrast, the breakup of Oxford's state schools appears to make comparatively little difference to Oxford's congestion levels which are – by mid-July – generally very low indeed. That said, the picture is somewhat different in Headington, where it is possible that hospital traffic is continuing to maintain local traffic levels, irrespective of the private school break up.

47. One of the more notable features of the North Oxford congestion mapping exercise is the extent to which it appears highly localised: the private schools are largely clustered in the middle of the maps below, with non-located towards the bottom, just north of St Giles. Likewise, the congestion evident on 4 July along the mid points of Woodstock and Banbury Roads does not appear just north of St Giles, and nor on other dates either. This indicates that traffic and congestion may – potentially – be highly localised: that it largely circulates in and out of North Oxford, and does not generally progress toward the city centre. This may

help to explain why measured traffic levels closer to the centre of Oxford – along both Woodstock and Banbury Roads – are generally lower than their edge- of city equivalents.

Illustration 3.13: The evaporation of congestion in North Oxford, four Friday mornings in July 2025 compared

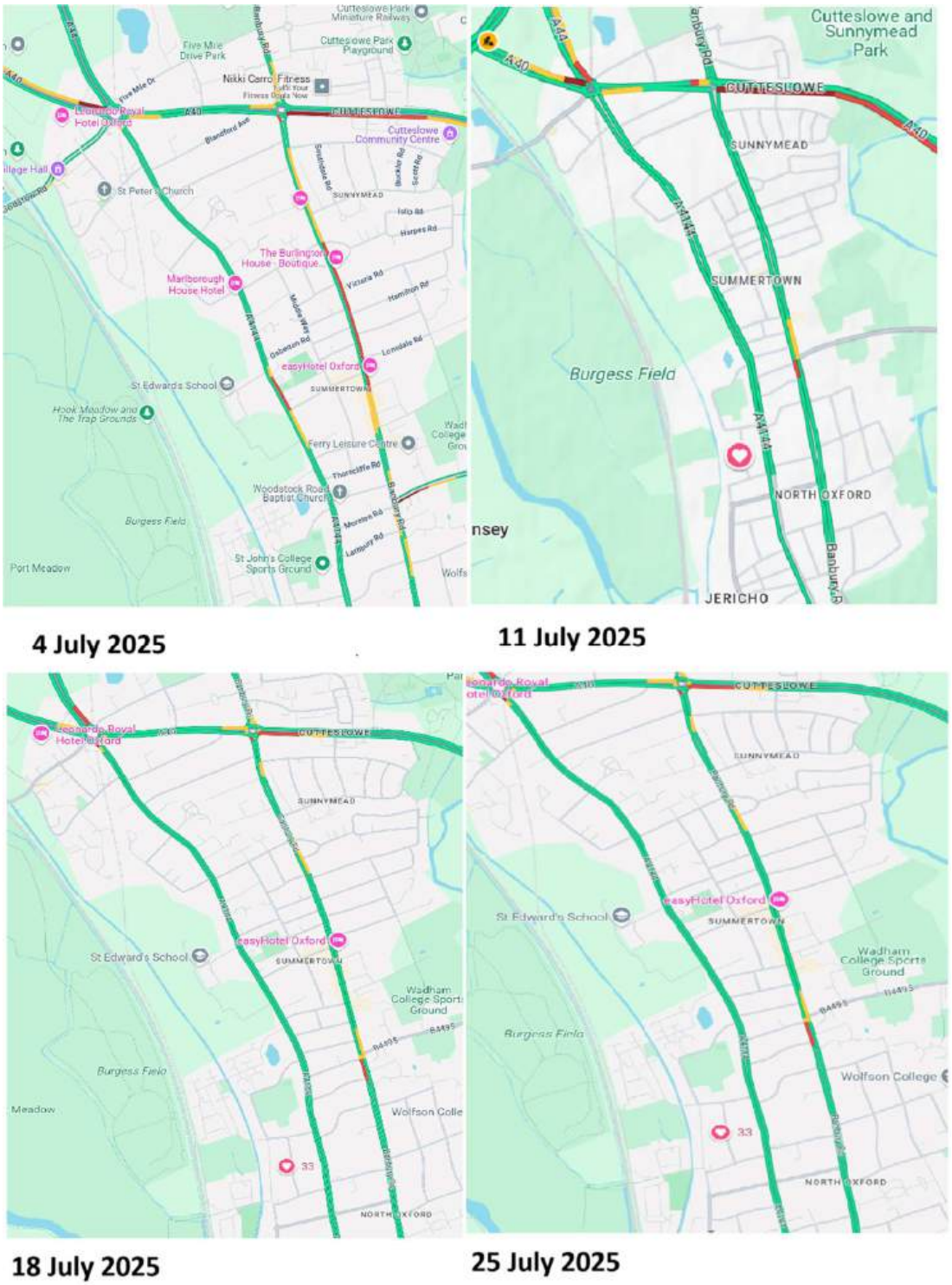
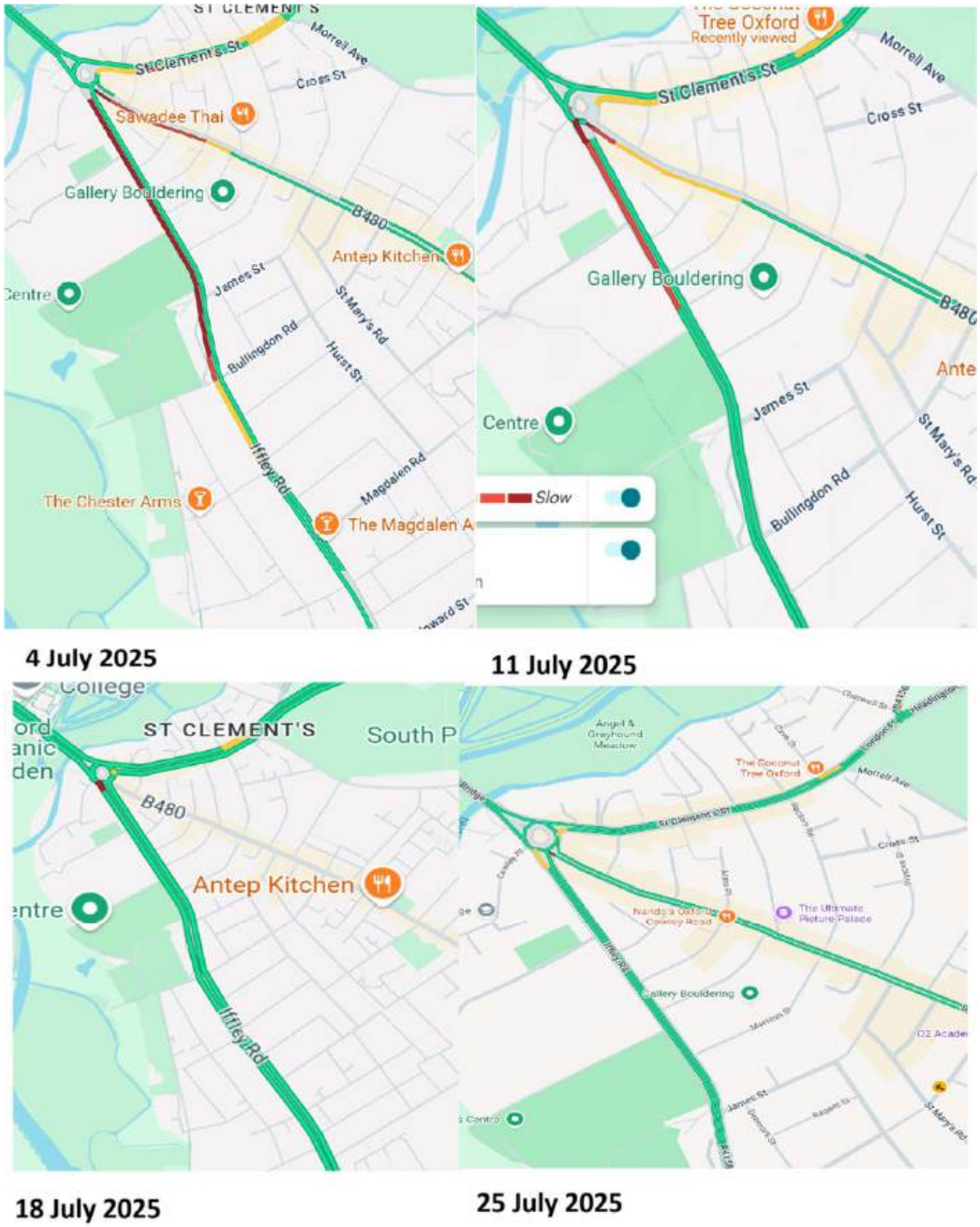


Illustration 3.14: The evaporation of congestion in central Oxford, four Friday mornings in July 2025 compared

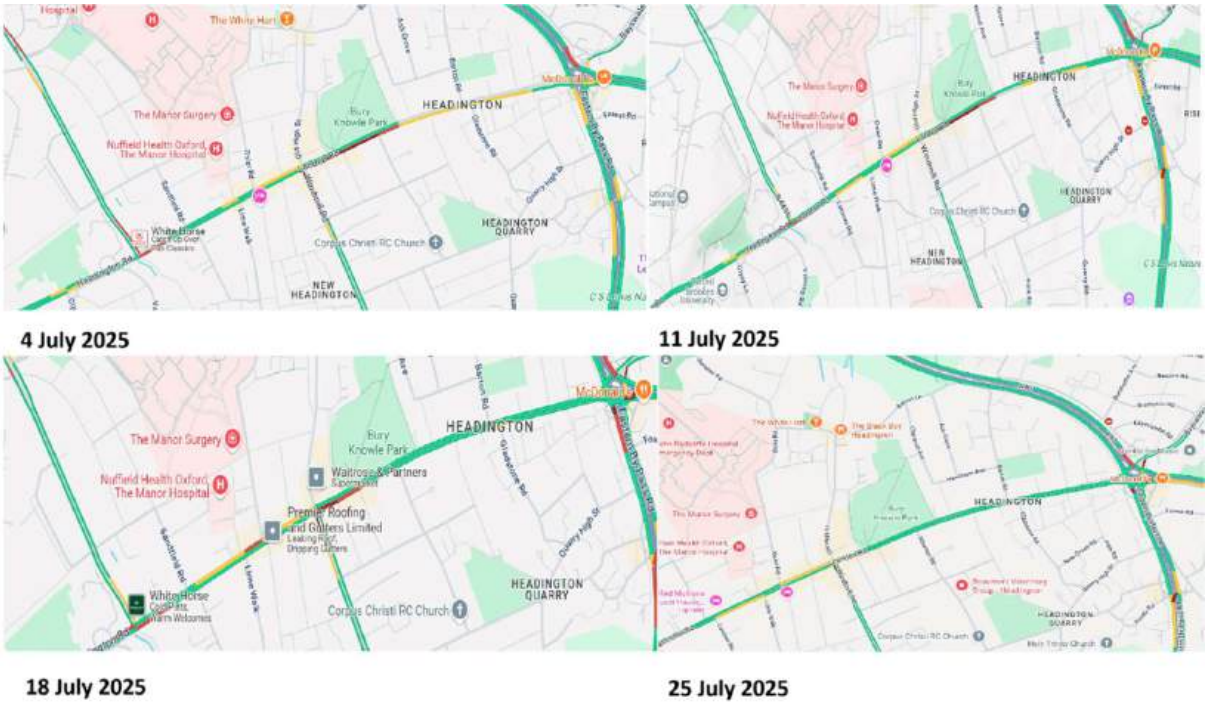


48. For example, average daily traffic counts on Woodstock Road south of the Wolvercote roundabout were 13,700 in 2023, the last year for which data is available. Further down Woodstock Road, near the junction of Leckford Road, average daily traffic levels in 2023 were 10,531 – more than 3,000 vehicles fewer. Likewise, on Banbury Road, average daily traffic levels were 14,407 in the far north of the city, near the Cutteslowe Roundabout, but 12,529 further into towards the city centre – close to 1,900 fewer recorded vehicles.

49. While not conclusive evidence of localised traffic circulation of private school traffic in North Oxford, these numbers do speak to a wider trend. As demonstrated by Headington Hill, for example, traffic levels in Oxford often fall as they get closer to the city centre, not increase. This suggests that much of the city's traffic is, in fact, circulating in its outer suburbs rather than concentrating in the city centre. If true, this has some significance for the likely impact of the congestion charge cameras on Oxford congestion: the cameras are often placed in the wrong location in order to catch this traffic.

50. As if to reinforce this point, our Google Maps congestion mapping revealed a somewhat different congestion picture in Headington, compared with north and central Oxford. Although, as table 3.2 above indicates, a small number of private schools do operate in Headington, there was no noticeable fall in congestion between 4 and 11 July 2025, when the Headington Rye private school ended its summer term. One possible reason for this is that traffic levels in Headington are more significantly influenced by hospital traffic than private school traffic – and hospital traffic is not significantly influenced by private school holiday times.

Illustration 3.15: The (non) evaporation of congestion in Headington, four Friday mornings in July 2025 compared



Steer / Ricardo modelling predictions for private school hotspots

51. With the nearest ANPR checkpoint in Marston Ferry Road, Summertown, Sunnymead and Cutteslowe will not be directly affected by the congestion charge scheme. However, the Steer modelling does predict significant traffic displacement, particularly in the city's outer edges around the Wolvercote and Cutteslowe roundabouts. Traffic is predicted to increase substantially towards the top of Woodstock Road, rising by an average of 1,217 vehicles per day, taking the average daily total to 8,365.

52. Further back into the city centre, but firmly within the North Oxford private school hub, traffic around the Woodstock Road / Frenchay Road intersection is also predicted to rise by an average of 722 vehicles per day, taking the average daily total to 7,558. In doing so, traffic is predicted to reach higher levels on these two sections of Woodstock road than the proposed congestion charge site of St Cross Road, which currently experiences average daily traffic levels of 7,332 vehicles. There is, therefore, a certain irony in a congestion reduction scheme actively pushing traffic levels in one part of the city higher than levels deemed acceptable in the other.

53. Just outside Oxford's main residential area, on the A44 immediately adjacent to the Peartree park and ride, the Steer / Ricardo predictions are also poor, with average vehicle numbers increasing by 1,001 per day to 11,558. While this stretch of road does have a bus lane in place to mitigate against the worst impacts of this traffic displacement, any increase in traffic on this road not likely to be welcomed, especially as the wider area is currently a major business and residential development hub.

54. For Banbury Road, the projected impact of the congestion charge scheme is not as bad as Woodstock Road: an increase in traffic levels in the run up towards the Cutteslowe roundabout, at the junction of Woodstock and Squitchey Lane of just 28 cars. However, in the context a road that already carries in excess of 14,400 vehicles per day – far more than most of the planned congestion charge sites – this offers precious little tangible benefit, compared with these sites, where significant falls in traffic volumes are predicted.

55. Finally, and continuing our theme that the proposed congestion appears to push more vehicles to Oxford's periphery while emptying its already quiet centre, the Ricardo / Steer modelling for the city centre end of Banbury Road makes precisely this point. In contrast with the increase in traffic at the top end of Banbury Road, there is a similar (if small) predicted fall in traffic levels at the road's city centre end. Here, the modelling predicts a fall in traffic around its junction with Canterbury Road of approximately 40 cars – also a less than stellar improvement, given the far larger disbenefits on the outer stretches of both Woodstock and Banbury Roads.

Conclusions

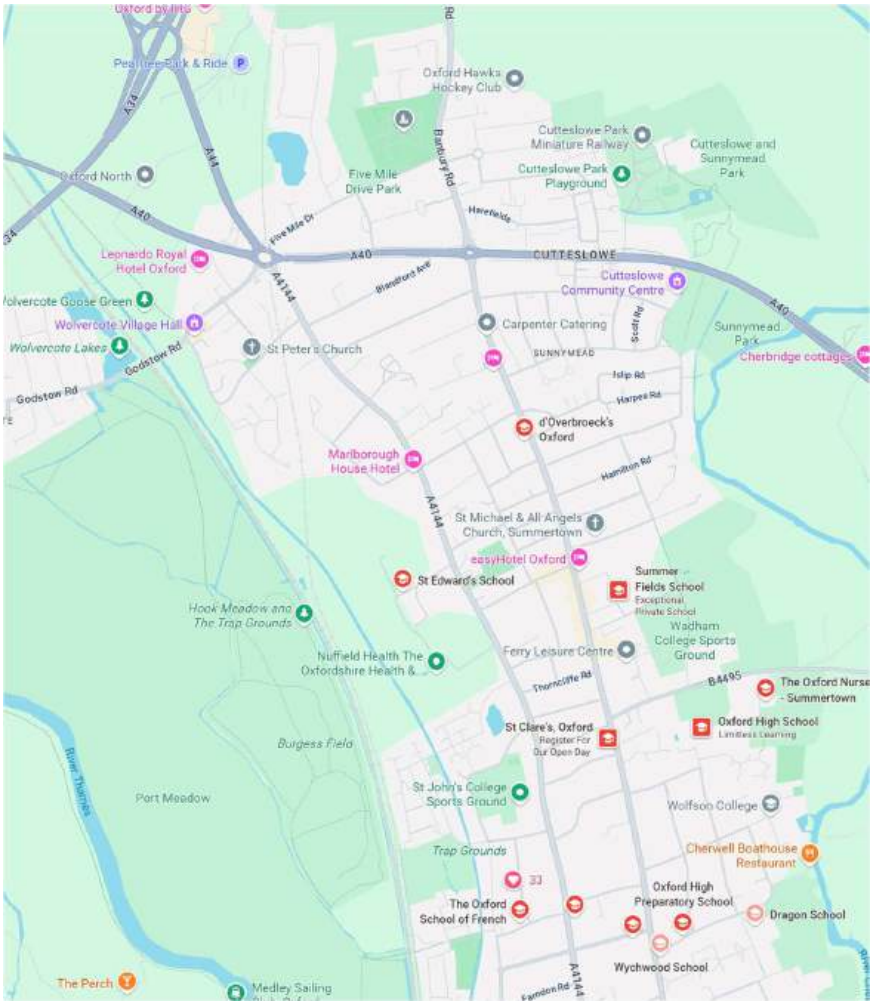
56. The evidence outlined above indicates a strong correlation between congestion evaporation and the ending of the private – not state – school term dates, particularly in North and central Oxford.

57. This is highly relevant to the proposed positioning of the ANPR congestion charge cameras. An inner Oxford parent who needs to cross the city on the school run every day may face the iniquitous choice of either paying a £5 daily congestion charge for almost half the academic year. Alternatively, they may feel obliged to take a far longer route to avoid the charge. By contrast, many private school parents will be able to travel into the city without hindrance – because their school run could easily involve passing no congestion charge checkpoints.

Possible solutions

58. With private schools likely to be a significant source of outer Oxford congestion, one possible solution is – once again – Oxford's park and rides. Notably, most of the North Oxford's private schools are within a short distance of Peartree Park and ride (see illustration 3.16 below). We suggest possible park and ride-related solutions in relation to private schools in chapter 5.

Illustration 3.16: The proximity of Peartree Park and ride to North Oxford's private schools



The role played by LTNs in contributing to Oxford's traffic and congestion

59. One of the more notable features of Oxfordshire County Council's congestion reduction proposals was its outright refusal to recognise the role of its low traffic neighbourhood (LTN) policy of manufacturing highly localised congestion in Oxford. Notably, the "options considered" outlined in the officer's report ahead of the decision did not even consider the removal of the LTNs as an option[93]. This indicates a closed mind by Oxfordshire County Council to a specific cause of congestion that Oxford's bus companies, to their credit, have explained in significant detail. We return to the bus company's LTN submission shortly.

60. The officers recognised that "direct access to hospitals bus links / park & ride" was an option worth considering, but then failed to explain how introducing measures heavily focused on the city centre would help ease congestion in a completely different part of the city – or, in the case of the Marston Ferry Road filter, actually increase traffic close to the hospital. When challenged about this omission, cabinet member for transport Andrew Gant stated that the bus companies "support the broad intent of traffic restraint policies, including LTNs" and that "The LTNs are part of the solution, not the problem[94]." In other responses to questions submitted by residents to councillor Gant, he has reiterated his view that "LTNs did not cause Oxford's congestion and removing them will not solve it[95]"

61. In light of these comments, it is worth summarising the evidence given by the bus companies in their formal consultation response to the "make permanent" decision for the East Oxford LTNs, made on 17 October 2023. In an 18-page letter of eviscerating detail, the Oxford Bus Company, Stagecoach and Thames Travel described the East Oxford LTNs thus: "The effects of the LTN implementation have been entirely detrimental to bus operations, to a degree that is probably entirely unprecedented, and certainly is within the last 50 years. This has, quite predictably, had a direct impact on bus use and on the current and potentially on longer-term sustainability of many services. In certain cases, especially after 2.30pm, a local bus journey in parts of East Oxford today takes so long to achieve that it is not a credibly relevant choice to any but the most physically infirm."

62. Noting that council officers "have not sought to conduct any kind of detailed or data-driven analysis of what the benefits, or disbenefits have been to bus operations, or the effects of the scheme on bus use in the City," the bus companies added that "at the time of writing – some 14 months after the LTNs were first implemented – no material mitigation measures have been implemented to deliver any meaningful benefit to bus passengers".

63. The letter went onto say: "the introduction of LTNs and their permanent confirmation in the manner proposed, leaves the County in the very uncomfortable position that they have directly caused bus services across the bulk of Oxford to become substantially slower, even less reliable, and as a result have further substantially reduced bus patronage and mileage, seriously aggravating the challenges caused by the COVID crisis."

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[93] Oxfordshire County Council. Cabinet. Traffic Filter Trial Delay - Mitigation Proposals. 17 June 2025. Available here.
[94] Oxfordshire County Council. Cabinet item 4 – questions from county councillors. Available here.
[95] Oxfordshire County Council. Councillor Gant response to Jelly Wells, County Council, 8 July 2025. Response on file with report author.

64. Explaining the real-world impact of the East Oxford LTNs, the letter went on: "traffic levels at the northern ends of Iffley Road and Cowley Road have grown on an adjusted basis by 33% and 65% respectively. This can only be described as a huge increase in traffic levels on key public transport corridors – higher than even we anticipated. If the intention of the measures was to reduce the impact of car traffic on mobility, and the public realm, it must surely be judged to have failed, and seriously so."

65. The letter goes on: "It should be stressed that these figures are a result of monitoring throughout the day, and that these figures, if anything significantly understate the impact seen at peak times, when traffic speeds are now so low on these roads owing to the saturation at and around The Plain, that traffic throughput has reached a cap at these times. We find it notable that the Report makes no attempt to quantify impacts on St Clements and the knock-on impacts on either Headington Hill and Marston Road, which are not directly adjacent to the LTN areas. This too has been exceptionally severe."

66. Delivering the exact opposite of what our suggestions mentioned elsewhere in this report aim to achieve, "bus journey times have become so extended, and as a result, timetable frequencies so reduced, that there has been a greater than 50% drop in one way seat availability between Churchill Hospital and the city centre after 3.30pm; and compounding this, for those journeys, it is actually quicker on many occasions to walk into the city centre, so slowly does the bus progress."

67. The letter then goes onto explain how bus journey times had been affected by the LTNs – occasionally positively, but mostly negatively (with the proviso that the February / March 2022 baseline was at the tail end of lockdown). "While minimum journey times have overall been broadly unaffected, and in many cases have actually improved, maximum running times have increased dramatically on all corridors, and have almost doubled on some routes. This is of crucial importance, as the achievable "peak" running time is what drives the requirement for vehicle and driver resources and so bus operator costs."

68. "We should end by highlighting that the maximum running times observed have generally been seen in the morning and evening peak periods: when the greatest number of bus passengers would want to travel. It is apparent that the offer we are able to provide to passengers has materially worsened at the time of greatest demand, and where the potential for mass transit to achieve a full range of transport and social policy goals ought to be the highest."

69. As a direct result of the chaos caused by the East Oxford LTNs, numerous route changes were made, including:

- Average scheduled bus run times on Cowley Road on two services was increased by 7%, and maximum scheduled run times was increased by 9%;
- The number 15 service on Morrell Avenue was reduced in frequency from every 12 minutes to every 15 minutes; the average scheduled Wood Farm to Queens Lane service was increased by 12%; maximum scheduled run time was increased by 67%;

- Service 9 to Risinghurst was withdrawn, as was the 13 service on Marston Road, leading to a 50% decrease in daytime frequency on this latter service. The maximum scheduled run time on the replacement service was increased by 45%.

70. The bus companies noted that bus patronage had decreased overall since the pandemic, down by 5%. However, patronage had decreased even further on routes that were affected by the East Oxford LTNs, with reductions ranging from 5% - 27%.

71. The above letter graphically indicates how far Oxfordshire Council is prepared to go to ignore evidence of harm when pursuing its policies of reduced vehicular access – an error the council risks repeating in relation to its congestion charge policy. But, remarkably, bus company letter summarised above isn't the first time that Oxfordshire County Council's transport polices have actively harmed bus services. When a similar LTN scheme was introduced in the Cowley part of Oxford, adverse impacts on bus services were also recorded – this time in the official evaluation report of the scheme[96].

72. This 2022 evaluation report told a similar story to that later recorded in East Oxford: "PM peak outbound service times along the Cowley Road (although making some improvements between November and April) remain worse in 2021 and 2022 versus the base year of 2019; the impacted route times, were also proportionally higher than the control route."

73. To help identify whether this was a city wide problem, a non-LTN "control" location was used as a comparator. While the report's authors were keen to avoid suggesting causality, there was no getting away from the fact that: "In particular, PM-Peak Outbound journeys in the impacted routes were proportionally higher than the control routes. There was a small period in August when there was some convergence, but overall, there's a significant difference. On the other hand, evening outbound journeys followed a similar trajectory in all months of the year barring March, when the impacted route was much higher, which coincided with the start of the LTNs' implementation."

74. The evaluation concluded: "Once we adjust for the pre-existing difference in difference, the peak increase in PM-peak journey time since LTN implementation is 22% - still a significant increase."

75. The scheme was made permanent regardless, despite failing to meet any of its previously stated objectives[97].

76. In light of all of the above, our proposals in relation to the Cowley and East Oxford LTNs is clear, and unambiguous: they should be removed, immediately. With these counter-productive, congestion manufacturing disasters removed, we can move to a new baseline of "normal" congestion. With that baseline reestablished, we can work out where evidence-based remedial action is needed.

[96] Oxfordshire County Council. Cabinet, 19 July 2022. Emergency Active Travel Tranche 1: Cowley LTN evaluation report. Available here.
[97] Oxfordshire County Council. Cabinet, 19 July 2022. Addenda. Petitions and public addresses. In particular, the presentation of Richard Parnham. Available here.

Conclusions

77. This chapter draws on a wide range of sources to strongly indicate that there are three main sources of traffic and congestion in Oxford; the hospitals (in Headington); the private schools (on Iffley Road and, to a lesser extent, in Summertown and Headington); and, on a very localised basis, the LTNs, in Cowley and East Oxford.

78. We find it remarkable that there is a complete disconnect between the congestion scheme proposed and the causes of traffic and congestion we identify – seemingly caused by Oxfordshire County Council either being unaware of the role played by hospitals in causing traffic, or disregarding exceptionally strong evidence of council policy actively causing harm in the case of the LTNs.

79. It is also remarkable that the role of the private schools in generating a significant amount of traffic and congestion has not been acted upon by Oxfordshire County Council, given the immediate and obvious effect on traffic and congestion levels in the city the moment private schools break up and return from their holidays.

80. The most obvious way to improve life for all stakeholders is, based on the evidence we present, to remove Oxford's LTNs, which have significantly disrupted existing traffic flows towards the city's private schools and hospitals. If any morning peak-time traffic remains on Iffley Road after this time, we advocate experimenting with the use of part-time morning traffic lights, prioritising access from Iffley Road.

81. If viable, we also advocate engagement with mapping solutions providers, such as Google Maps, to explore whether recommended routing to services such as the John Radcliffe Hospital should be modified to avoid encouraging drivers to travel via Iffley Road and the Plain. We also advocate the introduction of a segregated cycle lane between Iffley Road and Magdalen Bridge.

82. Having, we believe, correctly identified major sources of traffic and congestion in Oxford, our proposals directly flow from this problem identification. The proposal we suggest, focusing on new express bus services from the park and rides to Oxford's schools and hospitals are – unlike the policies advocated by Oxfordshire County Council, firmly based on carrots, not sticks. We significantly expand on this proposal in chapter 5.

Chapter 4: The missing Headington Hospitals problem analysis: Impact assessment and mitigation plan

Introduction

1. This chapter focuses on two key issues that we believe are closely interrelated. Firstly, building on our findings in chapter one, we explain how we believe Oxford's hospitals pose a significant challenge to Oxfordshire County Council's traffic reduction policies – in this case, its congestion charge proposal. In this section, we also indicate what we believe are deficiencies of the current main options for modal shift for longer journeys into Oxford – namely park and ride – by reference to hospital traffic. In the second part of this chapter, we highlight the unhelpful role of mapping software in both encouraging traffic – in this case, hospital traffic – through Oxford's city centre, while also failing to encourage modal shift to avoid doing so. We conclude this chapter by reappraising Steer's analysis of the likely impact of Oxfordshire County Council's congestion charge proposals on Oxford's hospitals.

2. Having explored the challenges posed by vehicular access to Oxford's hospitals in this chapter, we develop solutions in chapter 5, with a particular focus on park and ride provision.

Part one: The centrality of Oxford's hospitals to traffic generation

3. To the best of our knowledge, Oxfordshire County Council has undertaken very little research into the traffic and congestion issues caused by Oxford's hospitals. This is surprising, given the extent to which the hospitals contribute to both. So far, we have located one page of analysis in Steer's Business Impact Assessment[98] (BIA), produced as part of its 2022 traffic filters analysis. Steer's more recent Modelling and Income Forecasting Report[99,] dated June 2025, says nothing new on this topic.

4. The 2022 Steer BIA report contains a more extensive version of the chart below, which we present in modified form to focus on its hospital analysis. In this table, Steer's "-1" score under the "Effect in labour market – recruitment and retention" heading means Steer anticipates that hospitals will suffer from a slight adverse effect on recruitment as a result of the traffic filters – and, by extension, from the congestion charge. Otherwise, Steer believes, hospitals will be unaffected by the policy.

5. This report disagrees with Steer's analysis. In doing so, we begin by explaining the actual scale of the transport and traffic problems facing Oxford's hospitals, about which Steer appears unaware. We undertake this analysis with the aim of seeking to understand the likely impact of the congestion charge proposals on Oxford's hospitals, its visitors and its workforce. In light of what we have found, chapter 5 recommends traffic and congestion mitigation measures, which we believe will be effective.

[98] Steer. Oxford Traffic Filters Business Impacts. October 2022. Available here.
[99] Steer. Traffic Filters Temporary Road Charging Scheme – Modelling and Income Forecasting Report. June 2025. Available here.

Table 4.1: Steer's business impact assessment – effects on the public sector

Business type	Sub-group	Travel time	Direct costs	Effect on business operations	Effect on business demand / market	Effect on labour market- recruitment& retention
Public sector	Schools	0	0	1	0	-1
	Hospitals	0	0	0	0	-1
	Universities	0	0	0	0	0

6. To aid our analysis, we have used publicly available data to produce a comprehensive report on the staff and visitor logistics, which support Headington's hospitals. Then, using simple process improvement tools such as customer journey mapping, we have used Google Maps, to devise what we regard as workable solutions. We aim to mitigate against the significant traffic impact of Oxford's hospitals, which also support Oxfordshire County Council's objective of reducing the use of the private car in Oxford. However, unlike the council's congestion charge proposals, our proposals are based on carrots, not sticks. They are also based, we hope, on a reasonable understanding of traffic flows into, and out of Oxford's hospitals, by both cars and buses.

Our problem analysis

7. By way of background, we understand that two of Oxford's largest employers are the University of Oxford and the Headington hospitals. Both are within the city's ring road. Oxford University's workforce is approximately 19,500[100], whereas the Oxford University Hospitals (OUH) NHS Foundation Trust employs almost 14,000[101] – with several thousand more also working indirectly for the organisation, via various third-party organisations.

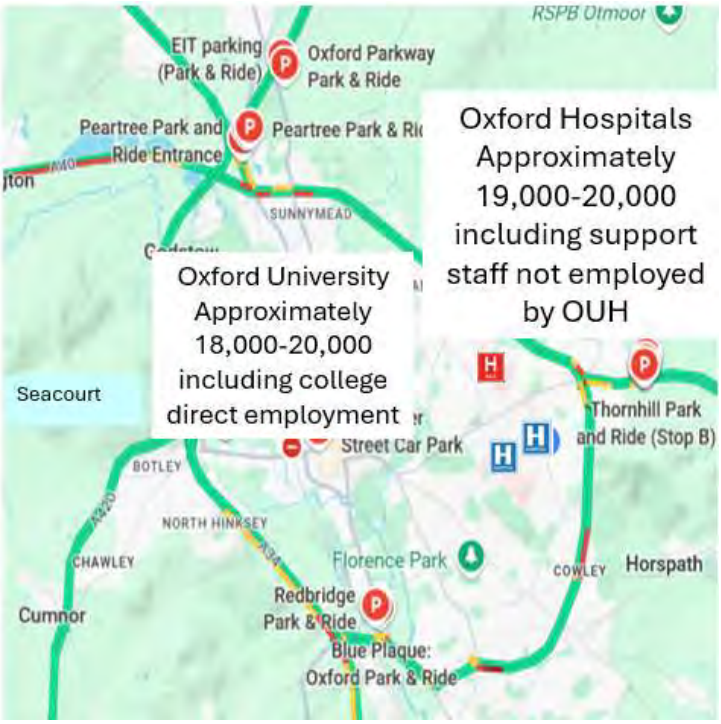
8. Understanding workforce headcount matters because, while the city centre is well served by existing bus services, Headington's hospitals are not. The deficiency in Headington's bus service is, we believe is the root cause of many of Oxford's traffic problems – especially given that Headington is a rapidly growing centre of employment.

9. Another key reason why we believe that Oxfordshire County Council's current approach to traffic management – i.e. its congestion charge proposals – is misguided, is because the congestion charge focuses on Oxford city centre. However, the teaching side of the University of Oxford only operates for around 25 weeks each year. This explains why much of the city centre is deserted, and traffic and congestion is non-existent, for nearly half the year. By contrast, Headington's hospitals work all year round. As a result, they likewise generate

[100] University of Oxford. Annual Report and Accounts 2023 – 2024. Available here.
[101] Oxford University Hospitals NHS Foundation Trust. Annual Report and Accounts 2024-2025. Available here.

traffic and congestion all year round, especially in Headington. Oxfordshire County Council's planned congestion charge will not operate in this area.

Illustration 4.2: The main locations of Oxford's major employers compared



10. The University reports that over 60% of its staff live outside the city. OUH, meanwhile, reports that 80% of its staff live outside the city[102]. Oxford Brookes did not give a precise figure in its Travel Survey 2022. However, in Appendix A of this report[103], Brookes published the map below, showing the location of staff postcodes and travel modes into work. Brooke's more recent 2024 staff and student travel survey indicated that 31% of the university's staff commuted in by car alone, and a further 4% car shared. By contrast, just 8% of students came in by car alone, with 3% car sharing[104].

11. With so many staff at major Oxford employers living outside the city and travelling in by car, it is useful to review the current provision of park and ride services that enable staff to get to work. We first explore park and ride provision in relation to Oxford city as a whole, before focusing on Headington's hospitals.

[102] Oxford University Hospitals NHS Foundation Trust. Healthy Travel Strategy: 2025 – 2027, A framework for travel strategy for the John Radcliffe. Acting CEO's forward. Available here.
[103] TPS. Staff & Student Travel Survey Report September 2022. Available here.
[104] Oxford Brookes University. Staff & student travel surveys 2024. Overview of results. Available here.

Illustration 4.3: Oxford Brookes staff – home locations and travel to work modes

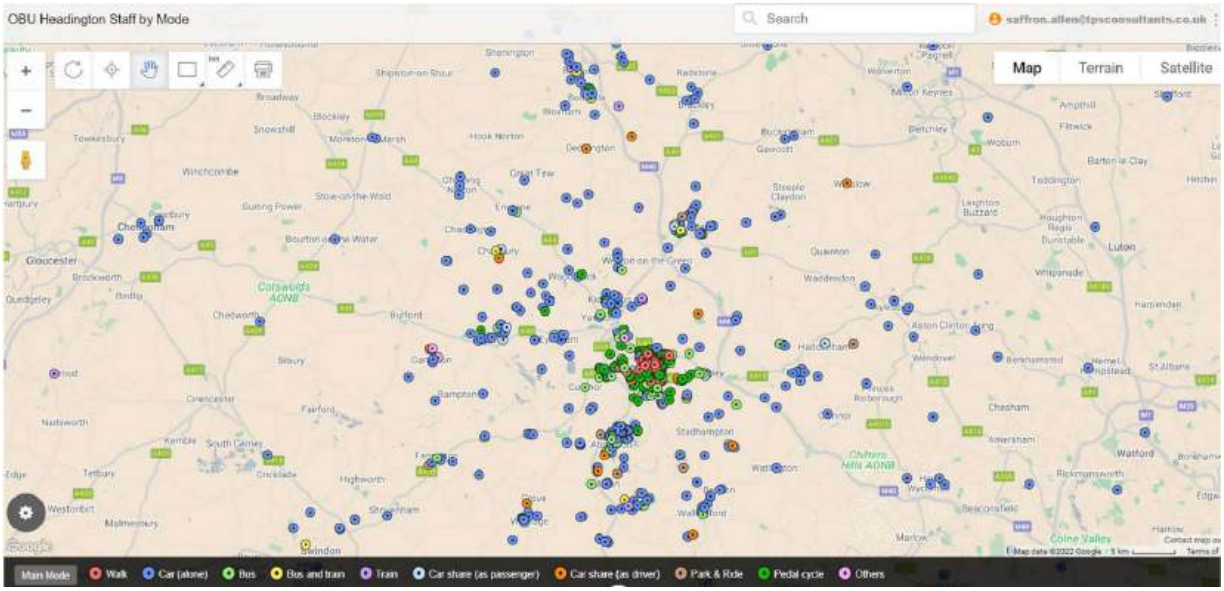
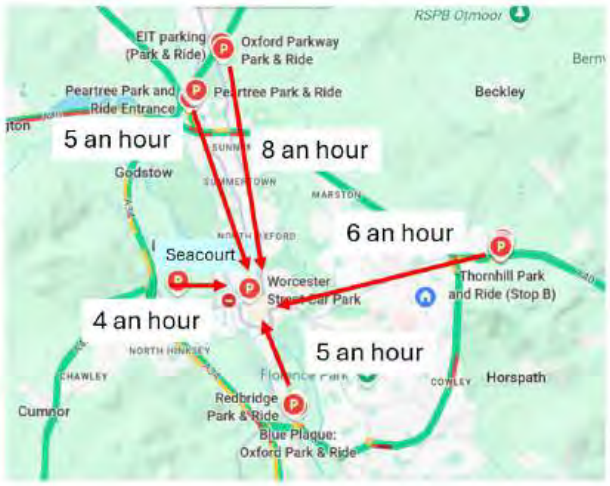
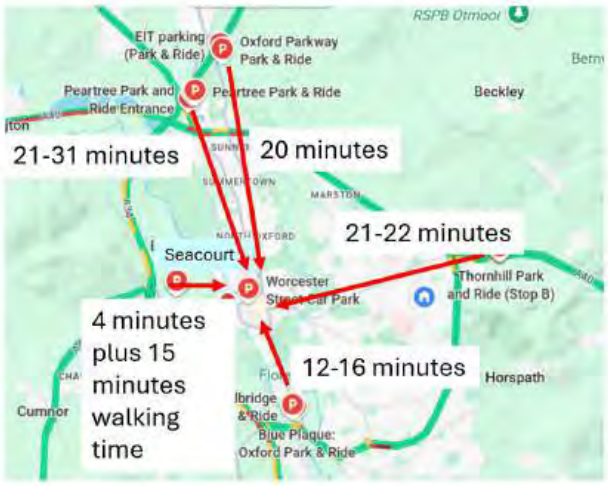


Illustration 4.4: current park and ride arrangements for the city



Total 28 P&R buses an hour



Time to get in from 4/12 to 31 minutes

Illustration 4.5: current park and ride arrangement for Oxford's hospitals

Total 7-8 P&R buses an hour to JR and Churchill/Nuffield
Plus 6 an hour to Headington Shops on the 400
Plus 2 from Oxford Rail Station

Time to get in from 14-47 minutes.
400 takes 8 minutes to Headington Shops,
then a 13-minute walk, total 21 minutes

12. Another way to portray the above is to weigh line thickness according to park and ride bus frequency. And, when park and ride bus frequencies and compared with Oxford's main population centres, it immediately becomes apparent there is a mismatch between the two. With the exception of Aylesbury, there are no large nearby population centres close to the east of Oxford. Instead, Oxfordshire's main population centres are primarily to the southwest and northeast of the city. This means that, to use Thornhill park and ride, commuters must commute around the ring road, out to Thornhill, and then into Headington. This all adds journey time, and contributes to park and ride being a less attractive option when compared with point-to-point travel.

Illustration 4.6: The frequency of Oxford's park and ride services

High frequency from the east, less frequent from the south, infrequent service (every half hour) or no service from other directions

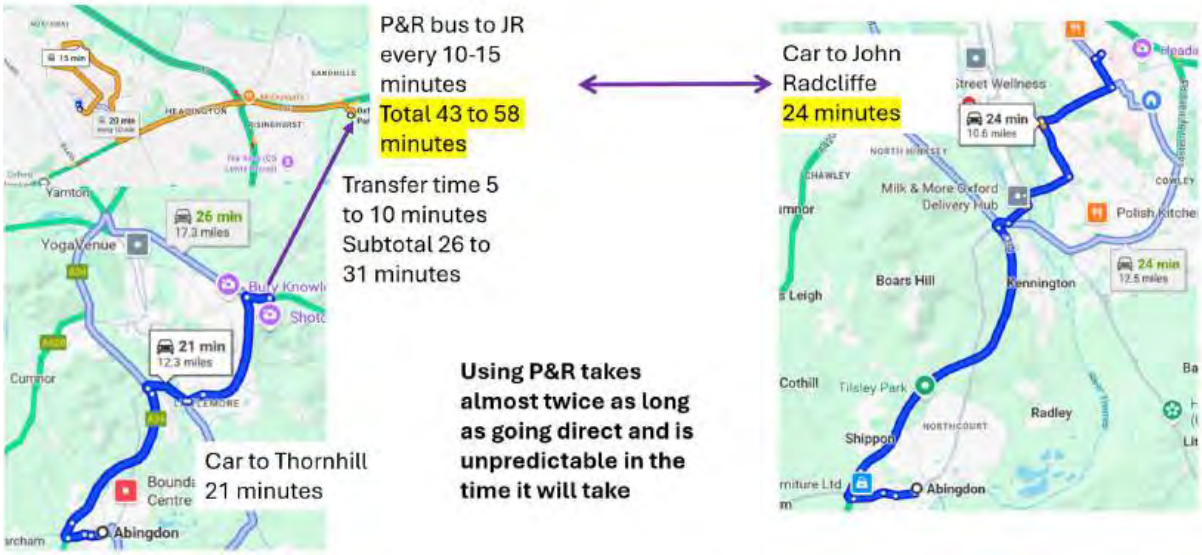
Illustration 4.6: Oxfordshire's main population centres

In 2023, the population of Oxford is estimated at165,200 while the population of Oxfordshire is estimated at 750,000 in 2023. So roughly 78% of the Oxfordshire population, some 585,000, live in Oxfordshire but outside Oxford.

Populations in orange are outside OUH's primary catchment of Oxfordshire

13. To illustrate this point, we compare journey times from Abingdon to the John Radcliffe, both direct and via Thornhill park and ride. There is a clear winner (direct travel) and a clear loser (travel via park and ride). This matters, because journey unpredictability and total travel time are the two highest complaints about using public transport.

Illustration 4.8: comparing car journey times from Abingdon to the John Radcliffe – direct versus Thornhill park and ride



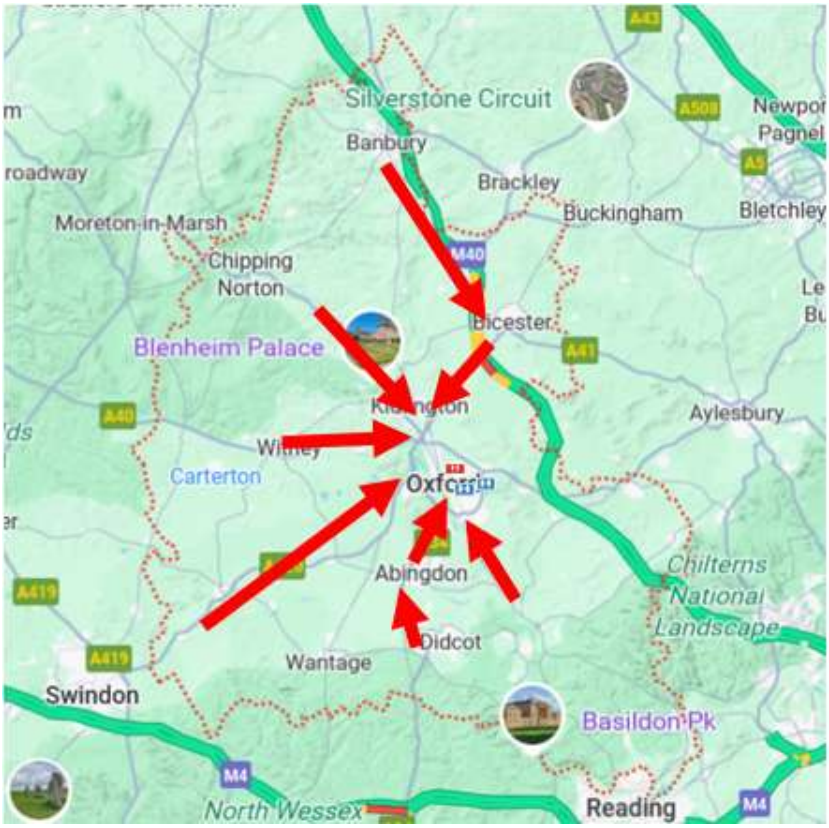
Historical growth of employment in Headington

14. Headington has a long medical history: the Warneford hospital opened in 1826[105], followed by the Nuffield Orthopaedic Centre in 1872[106] and the first hospital on the Headington Manor site, now the John Radcliffe, opening in 1927[107]. The Churchill Hospital opened in 1942[108].

15. To illustrate the post-war growth in hospital employment in Headington, the John Radcliffe Hospital opened in 1972 with the construction of the maternity wing, which we estimate employed up to 600 staff initially. Phase 2 was then swiftly constructed with additional services frequently added on, such as the transfer of the Radcliffe Infirmary in 2007. The other hospitals in Headington, the Churchill, the NOC and the Warneford Hospital were developed over the same time period. Initially employing just 600 people, the hospitals' workforce is now estimated to be between 19,000-20,000. As increasing numbers of staff travel into work from around Oxfordshire, routes towards the hospitals have gradually become busier.

16. Given most staff live outside Oxford and most commute in by car, what are the routes they use? Across the county, from Oxfordshire's major population centres, it looks like this.

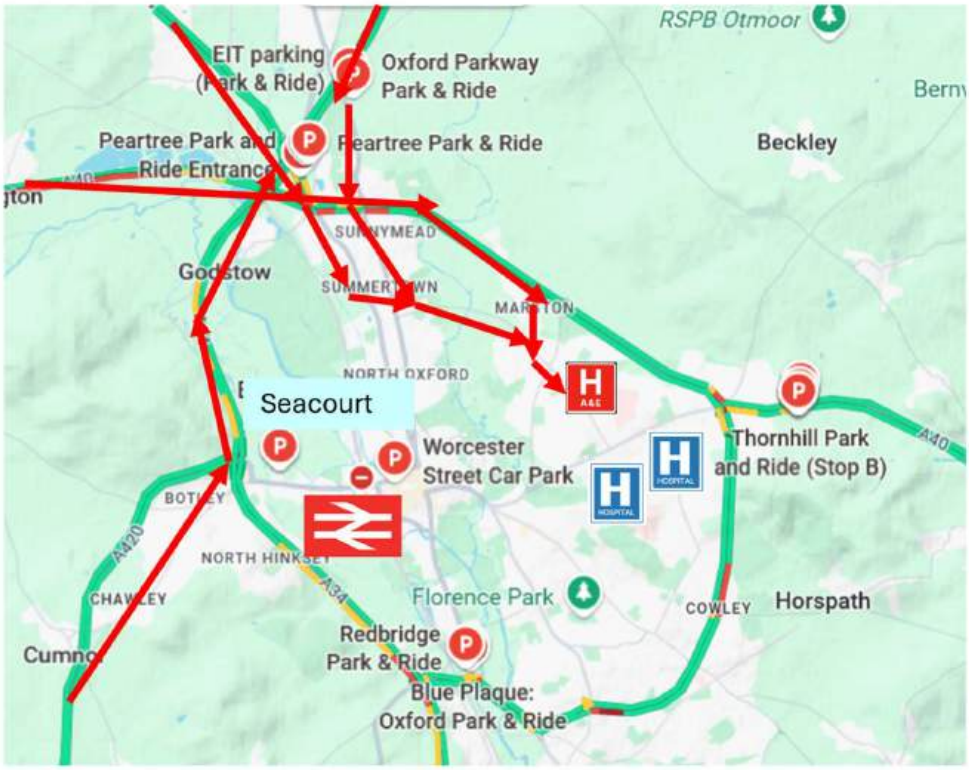
Illustration 4.9: Oxfordshire's main commuting route into the city



[105] Oxfordshire Health Archives. Warneford Hospital, Oxford. Available here.
[106] Oxfordshire Health Archives. Nuffield Orthopaedic Centre. Available here.
[107] NHS Oxford University Hospitals NHS Foundation Trust. Our history. Available here.
[108] NHS Oxford University Hospitals NHS Foundation Trust. Our history. Available here.

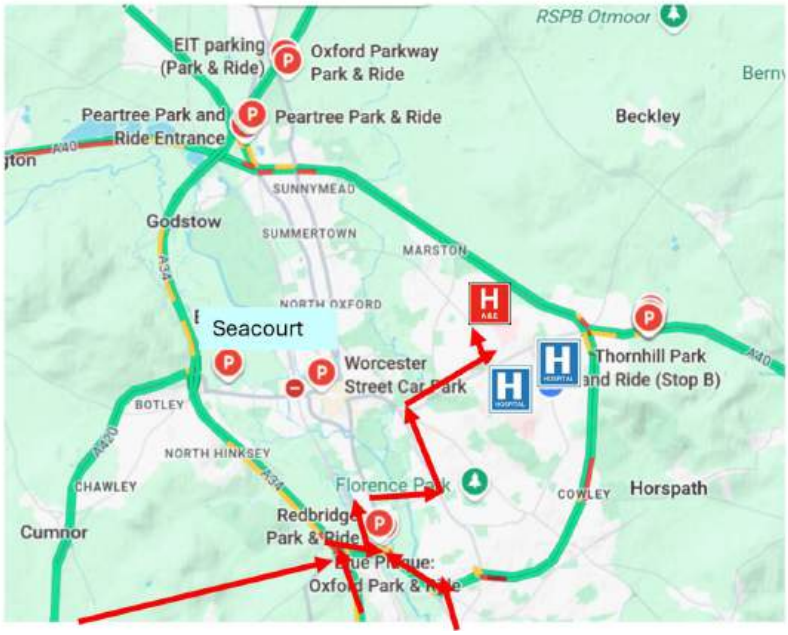
17. But when the traffic gets to Oxford, it splits into two principal routes to the hospitals. We will focus on the northern routes to the John Radcliffe first. There are two notable pressure points where commuter routes coalesce: firstly, around the Peartree park and ride, and secondly, on Marsh Lane in Marston. Travelling through the first pressure point, visitors enter the city via Woodstock or Banbury Road, and then continue onwards to Headington along Marston Ferry Road. This route also serves as a school drop-off point for parents who "trip chain" along their route into work (as an aside, we believe the Council's equality impact assessment should acknowledge this known phenomenon). The second route to Oxford's hospitals bypasses the Marston Ferry Road, instead entering the city via the highly congested Marsh Lane. In chapters two and three, we previously discussed how traffic levels on Marsh Lane are predicted to increase if the congestion charge is brought in. We have also previously discussed how Marston Ferry Road, while typically free flowing, will have a £5 daily congestion charge toll imposed on it if the congestion charge is approved.

Illustration 4.10: Main hospital-bound traffic routes from the north of Oxford



18. For access routes from the south, we made a surprising discovery, previously signposted in chapter two. For anyone using satellite navigation to guide them to the hospital area, the navigation software typically does not direct them, as we might hope, around the ring road. Instead, visitors are typically directed through Oxford's suburbs – across Donnington Bridge, down Iffley Road and into the congestion hotspot that is the Plain. In truth, perhaps we should not be surprised, given that this route to the John Radcliffe from the south is somewhat shorter in distance compared with the ring road. Anyone whose satnav is set to the shortest distance is highly likely to be directed via this route.

Illustration 4.11: Main hospital-bound traffic routes from the south of Oxford



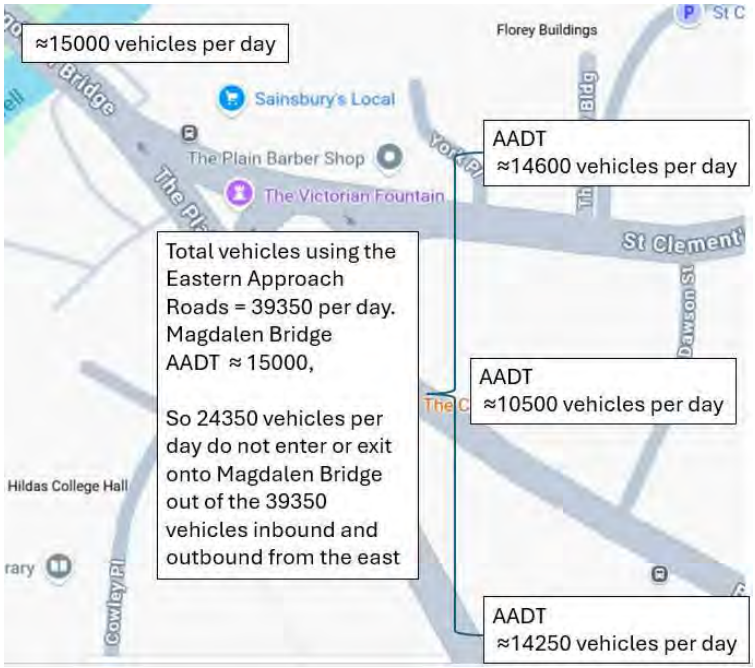
19. We made this discovery after noticing something odd about the average annual daily traffic (AADT) counts, as stated on Oxfordshire County Council's freely available online map[109].We noticed that, although the total average daily traffic count for the three roads approaching the Plain from the right added up to 39,350, the traffic count on the immediately adjacent Magdalen Bridge was just 15,000 vehicles. Clearly, more than half the vehicles using these three roads were not continuing westwards to the city centre – ironically, towards the proposed St Cross traffic filter site.

20. In light of this, we asked ourselves: how many vehicles a day are potentially taking this southern route into Oxford? On roads of this size, AADT covers vehicle movement both ways. On that basis, it looked as if up to 12,000 vehicles could be using the southern route each day. So where were these vehicles going? An hour's observation on the Plain yielded the answer: the main flow of car traffic through the Plain is not East-West, as we assumed – and we assume Oxfordshire County Council does too – into the city centre. Rather, traffic is generally travelling north to south, from Iffley Road to St Clements and vice versa.

21. Here though, we should distinguish between buses and other vehicles. Most car and other vehicles travel north to south, around the Plain roundabout and onwards towards Headington. By contrast, the main flow of buses and taxis is east to west – heading across Magdalen Bridge towards the High Street. This is understandable, given that the High Street is only open to buses and taxis for most of the day. While Oxford's High Street "bus gate" is in operation, cars and vans can only travel across Magdalen Bridge towards the perennially quiet St Cross Road – one of the six proposed congestion charge ANPR checkpoints.

[109] Available here.

Illustration 4.12: Disappearing traffic – not continuing across Magdalen Bridge



22. That said, this routing means that cars and vans on the one hand, and buses and taxis on the other, are cutting across each other, exacerbating congestion at the Plain. We proposed a possible solution to this problem (i.e. traffic lights in the Plain, prioritising access from Iffley Road), in chapter one.

23. These observations also led us to notice that no buses appear to travel from Iffley Road to St Clements, or in the reverse direction. We question whether this route has been identified and modelled in the Oxfordshire Strategic Model[110]. If it hasn't, we think that is a serious omission.

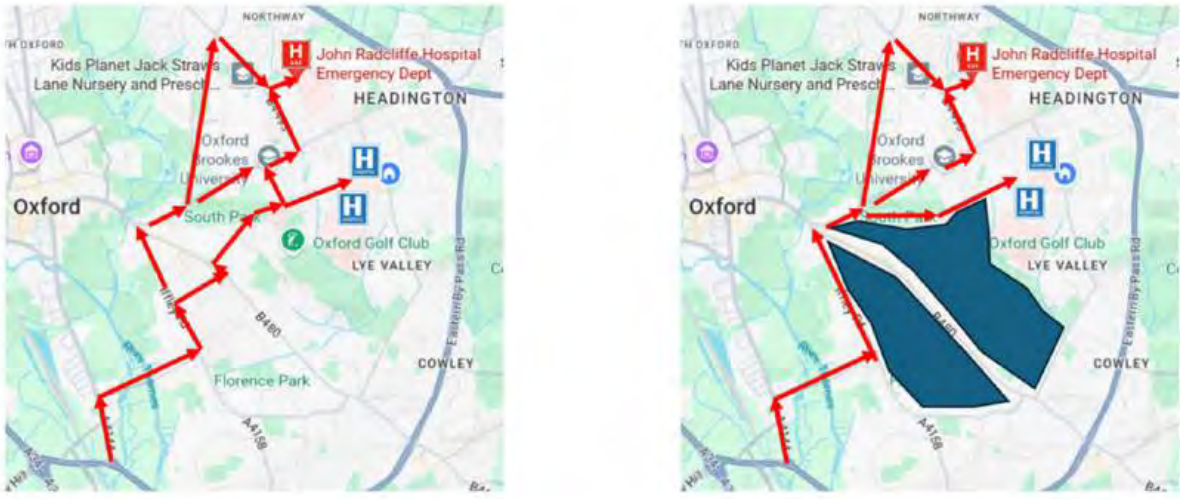
[110] Available here.

Illustration 4.13: Observed bus and car flows, plus likely bus delay inducers

Black represents the bus flows, red the north – south car flows. Every black line represents a bus service delayed.

24. Returning to the subject of the East Oxford LTNs: below, we illustrate how they have exacerbated congestion around the Plain, by effectively cutting off through routes between large parts of East Oxford. The LTNs have cut off these through routes, hindering residents' ability to access their most direct routes to Iffley Road, Cowley Road, Morrell Avenue and others. The LTNs have also, in many cases, pushed local traffic onto the same roads (mainly, Iffley Road) as both private school traffic and hospital traffic.

Illustration 4.14: The east Oxford LTN boundary road effect



25. Add in population growth in the south of the county – estimated at 10-15% between the 2011 and 2021 censuses – continuing population growth, and the 45% increase in the size of the OUH operation in Headington over the last ten years, and combine it the boundary road effect of the LTNs in East Oxford – which focused a great deal of hospital bound traffic on the Plain – and it not surprising that Luke Marion, managing director of Oxford Bus Company, says there are now "traffic jams during peak hours that previously did not exist"[111].

26. To recap: so far, we have identified that:

- the working populations of Oxford University and the Headington Hospitals are similar in size;
- that despite being similar in size and despite Oxford University primarily being in operation for only half the year – while the hospitals work constantly year round – there are roughly 50% less park and ride busses serving hospital sites that serve the city centre, where the university is mainly located;
- that existing park and ride services to the hospitals only run into the city from a direction where there is no sizeable population outside the city;

27. We have also identified that the catchment area served by the hospitals is approximately 3-4 million in number, with most patients coming from outside Oxford but from within Oxfordshire.

28. Running 50% less park and ride buses for the same working population is one oddity we have spotted. Running buses in from one direction, where few people live, is another oddity. Not running sufficient park and ride services from the directions in which people actually live is a third oddity. Collectively, Oxford's approach to park and ride adds up to an irrational logistical approach to serving Headington's hospitals.

29. We have also identified the main routes into the hospitals from the Oxfordshire population centres: the northern route and the southern route. The southern route is particularly concerning as it runs through the Plain, putting into conflict with the flow of traffic into the city at busy periods.

30. Turning now to the daily travel demand profile of the John Radcliffe hospital, based on the hospital's Framework Transport Strategy, published June 2025[112].

31. First, it is worth noting that most staff arrive by 7am and leave between 4 and 8pm. For example, in A&E, it appears that many medical staff work 7.30am to 8pm as standard[113].

[111] Oxford Clarion. Oxford's traffic emergency needs a bold approach – Luke Marion on the congestion charge. 1 July 2025. Available here.
[112] Available here.
[113] Oxford University Hospitals NHS Foundation Trust. Welcome to the John Radcliffe Emergency department. Available here.

Illustration 4.15: Staff arrival times at the John Radcliffe Hospital

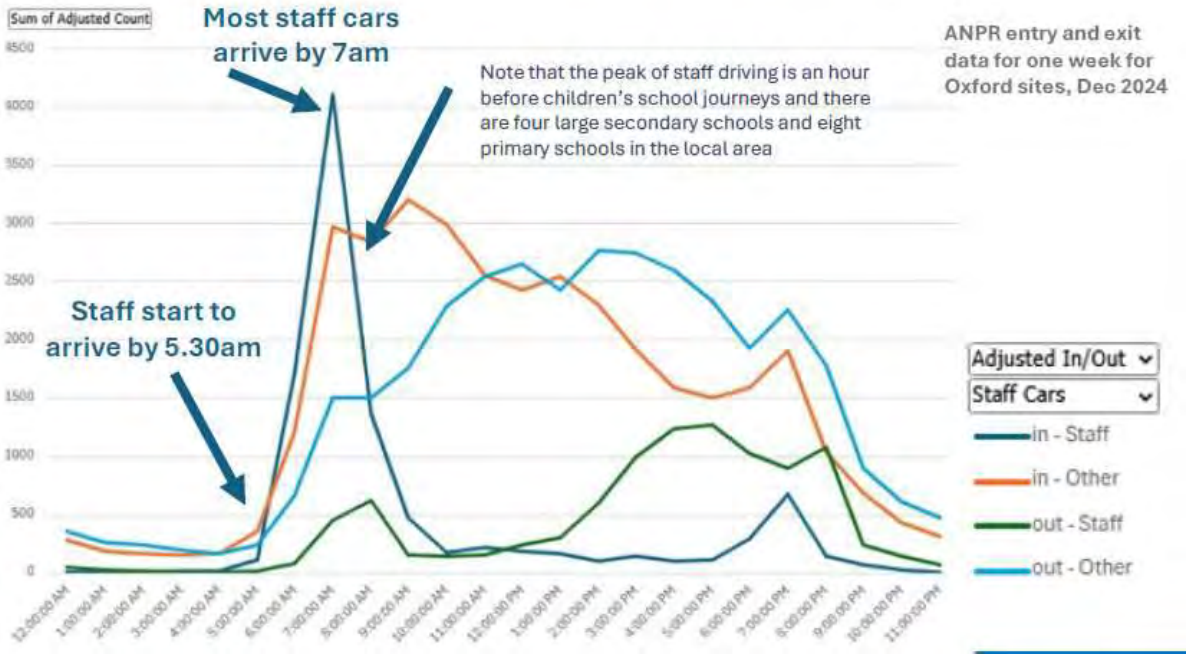
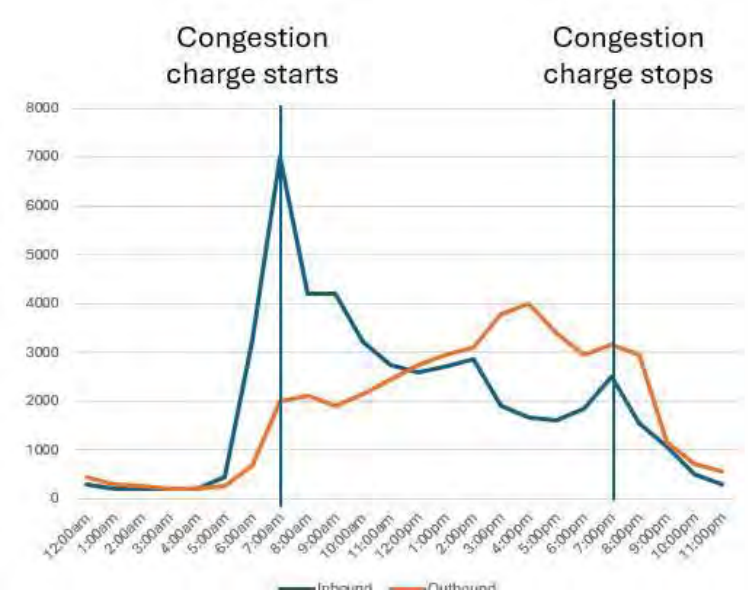


Illustration 4.16: inbound and outbound daily traffic flow, John Radcliffe

32. We then grouped the inbound and outbound traffic together. And added Oxfordshire County Council's proposed congestion charge times – for most locations, accepting that the Marston Ferry Road and Hollow Way operate shorter hours, at least initially.

Illustration 4.17: John Radcliffe traffic flow versus Oxfordshire County Council's congestion charge timings compared.

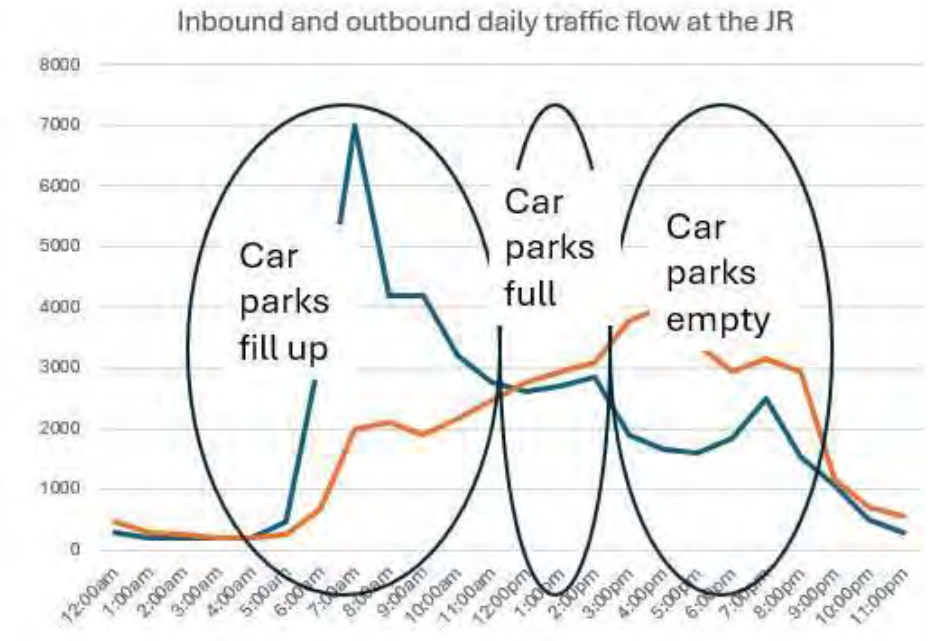


33. This graph demonstrates the causes of the congestion seen around the John Radcliff. In the morning, the hospital shifts start before any other of Oxford's main institutions have started to generate significant amounts of traffic. By contrast, in the afternoon drivers leaving the hospital are unavoidably competing for the restricted road space around Headington with other road users.

34. Hospital traffic has a significant impact on bus services around the John Radcliffe, because several bus services are routed up and down Headley Way, to and from the John Radcliffe. It can often take 30 minutes at peak rush hour to travel from London Road to Marsh Lane. Despite this, Oxfordshire County Council is not recommending any congestion charge cameras on Headley Way. This, we believe, sends out mixed messages about the purpose of the congestion charge – especially given the weight given in public statements about the need to improve bus service. The council wish to install congestion charge cameras on two roads – Hythe Bridge Street and Thames Street – that currently have no bus service. However, the council has given no indication that it will deploy a congestion charge regime on probably the worst traffic-affected bus route within Oxford. To us, this inconsistency by Oxfordshire County Council is yet another sign of its irrational decision-making when it comes to transport policy.

35. Returning to the John Radcliffe inflows and outflows graph, we can see the impact on car parking. Please note, however, that the Y column contains numbers based on the John Radcliffe graph. As a result, we do not know for certain what these figures represent. However, we assume they are weekly total counts by hour, for each hour in a 24-hour-day. At this point, we feel it is more important to observe and understand the pattern of movement, rather than look at absolute numbers.

Illustration 4.18: inbound and outbound daily traffic flows at the John Radcliffe



36. Depending on their chosen route, it is clear that many inbound staff to the John Radcliffe will not be affected by the congestion charge hours of operation because they arrive before 7am. Nevertheless, they may be if they leave before 7pm. However, the category "other" will be so directly affected by the congestion charge. So let's put the staff to one side and look at "other" in more detail – shown on the graph in orange.

37. "Other" comprises several groups, such as deliveries, buses, taxis, patient transport and ambulances. However, it is likely that the largest group in this category will be patients and visitors, or patients-visitors at the John Radcliffe Transport Strategy calls them. It is difficult to establish just how many visitors the John Radcliffe receives, because OUH reports on a whole trust basis, and not by site. Indeed, the trust readily admits that there is currently a lack of accurate data to assist it with its decision-making.

38. However, we can make some rough estimates. According to its 2022 – 2023 annual accounts, the hospital treated 95,000 inpatients, 1,250,000 outpatients, and carried out 228,000 diagnostic tests. Adding those together, this comes to 1,573,000 health activities. – the equivalent to 4,300 per day or about 6,000 during a five-day working week. Making some assumptions, it is plausible that around 5,000 patients, plus inpatient visitors, will visit Headington's hospitals every working day.

39. Let's now adjust these figures to allow for the young population of Oxford: around 43,300 students are included in Oxford's population of 165,200. Thankfully, few students will need hip replacements or cancer treatment. Removing these from the equation gives a permanent Oxford population of around 122,000. This is roughly 17% of Oxfordshire's 706,700 non-student population.

40. Applying this to the number of patients visiting per day, it appears that between 4,000- 4,500 visitors to Oxford's hospitals are coming into Oxford each day from the wider county. This will result in two, or more, car journeys as they are dropped off and picked up. By contrast, we assume that less than 1,000 will be arriving from within the city.

41. Why does this matter? It matters because the congestion charge's equality impact states, at page 15, the John Radcliffe is "Oxford's largest hospital." We believe this is something of an understatement: it is not just Oxford's largest hospital, it is Oxfordshire's largest hospital. Its catchment area is not just Oxford's 122,000 permanent residents, but that of the entire county. Indeed, the John Radcliffe's reach goes beyond this: it is also a regional hub for trauma serving Thames Valley, including Oxfordshire, Buckinghamshire and Berkshire, Milton Keynes, Wexham Park, Stoke Mandeville (Aylesbury) and Reading, with a total population of roughly 3 million. All told, Oxford's Trauma Service treats about 26,500 people per year, or roughly 70 per day. We suspect the majority of these patients will come from outside Oxfordshire.

42. To this total we can add the Warneford Hospital, which is run by a separate trust – the Oxford Health NHS Foundation Trust. This trust's catchment area covers Oxfordshire, Buckinghamshire, Swindon, Wiltshire, Bath and North East Somerset. The Warneford is shortly to be expanded to become the Warneford Park mental health hospital[114]. We have been unable to locate visitor data for this trust's facilities. However, our working assumption is that patients will travel in daily from the wide catchment area.

Illustration 4.19: OOH's wider trauma catchment area

OUH's wider Trauma Catchment area in red with Oxford Health's catchment in blue, the overlapping catchment area of the two trusts in purple.

Estimated catchment population is circa 3-4 million people, not 165,000 as seems to be implied by the Congestion Charge documentation

43. Focusing back on the John Radcliffe: the OUH strategy paper reports 75,524 vehicle movements in a week. This works out at an average of 10,789 per calendar day. Allowing for quieter weekends, this could easily be around 13,000 vehicles per working day, plus around 5,000 per day at the weekend. With only 2,150 staff car parking spaces and 730 visitor parking spaces, the only way to explain the discrepancy in these numbers is that many vehicles must either be parking on site for a short time or dropping off and returning later.

[114] BBC News. Views sought on new £500m mental health centre. 5 December 2024. Available here.

This would help explain the high numbers of daily vehicle movements. Moreover, this figure also loosely correlates with the number of vehicles travelling across the Plain. However, we accept that more work needs to be done to confirm the correlation in vehicle numbers between the Plain roundabout and those that arrive at the John Radcliffe entrance. We believe that Oxfordshire County Council should undertake this analysis as a matter of urgency, before it even considers approving the congestion charge.

44. For the next stage of our analysis, we will ignore the health component of this traffic and treat all the incoming patient traffic as visitors. Framing traffic in this way helps make comparisons with other visitor types.

Illustration 4.20: Oxford's hospitals as its second largest "visitor attraction"

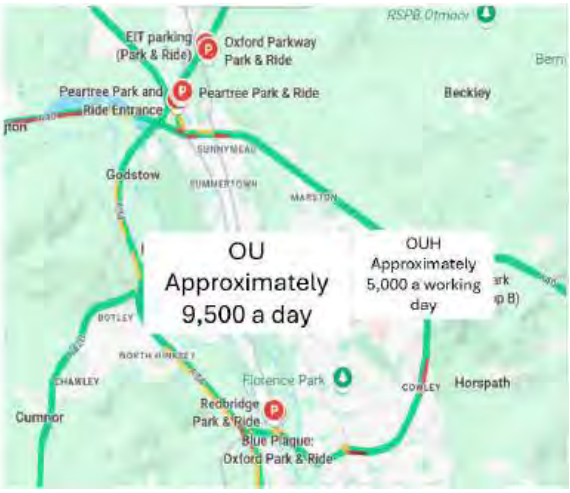
Oxford City's second largest "visitor attraction"

OUH treat roughly 5,000 patients & outpatients, plus visitors per working day in Oxford.

Oxford University greet 3,500,000 visitors a year, that's 9,500 visitors a day.

The key difference is that visitors to the University can use a variety of modes of transport.

As most hospital visitors are from outside of Oxford but from within Oxfordshire, we suspect that they are very restricted in their choice of transport.



45. Again, as with employees working in the city centre, visitors to Oxford are well served by a variety of transport modes: the 2022 Steer survey indicates[115] various travel modes are used, including bus (32%), train (17%) and taxi (11%) – and just 9% using a car. However, we repeat our observation that most of Headington's hospitals are notably less well served with viable alternatives to the car, including 50% less than park and ride provision than is delivered to the city centre. Indeed, most park and ride services run from a direction that visitors do not arrive from (i.e. south to North). Not surprisingly, therefore, car use is prevalent for reaching the hospitals, as the Steer report implicitly acknowledges in figure 4.13 – without then substantially exploring the issue any further.

46. Given that cars are also the sole target of Oxfordshire County Council's congestion charge schemes, we cannot reconcile the council's desire to see a significant reduction in car use across the county with the role of Oxford's hospitals as key regional health facilities. This disconnect is evident in the congestion charge consultation materials. More serious would be any attempt to make it harder to access Oxford's hospitals, for both staff and patients. If private cars cannot be used to bring in staff and patients, we believe this will have a significant and adverse impact on health care provision in Oxfordshire.

47. Given the importance of maintaining Oxford's hospital provision, we believe it is vital that alternative, viable, and attractive options are put in place before any coercive and regressive measures to reduce car use are implemented. However, we have not been able to identify

[115] Steer. Oxford Traffic Filters Business Impacts. October 2022. Available here.

any material alternative proposals in the congestion charge plan. We believe it is irrational of Oxfordshire County Council curb private car use before putting in place alternatives.

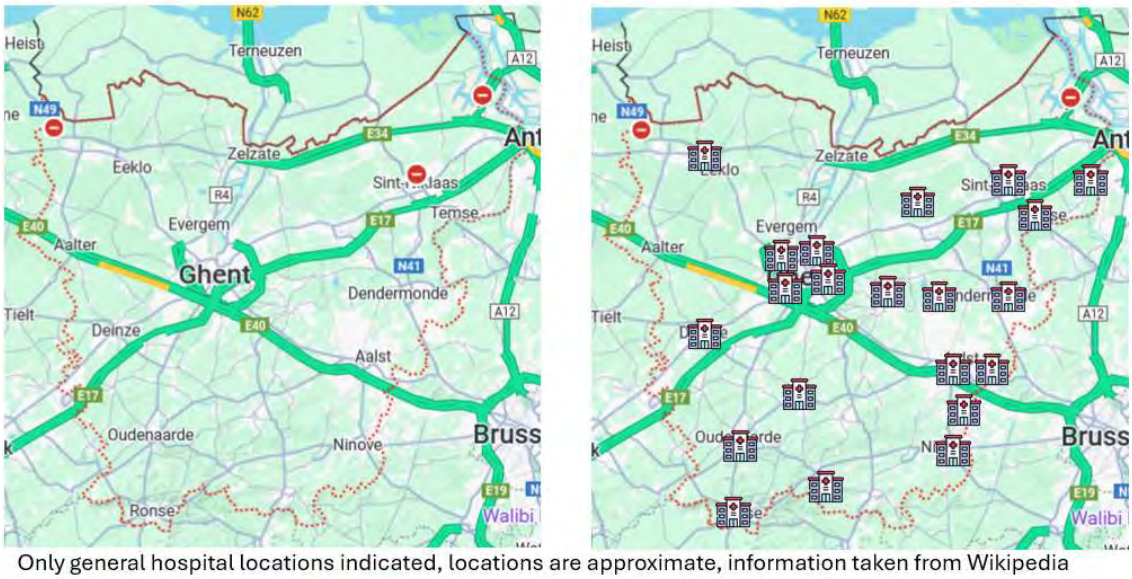
48. We believe that any car reduction targets adopted by Oxfordshire County Council must recognise the issue of elasticity of demand (or lack thereof) regarding hospital services. For example:
    - Medical staff have to travel in to treat patients, normally from outside Oxford
    - We note that in the OUH transport strategy paper, over 50% of surveyed staff believe they could work from home. We believe that Oxfordshire County Council should use its influence to actively encourage this, where possible.
    - Many patients will need to visit the hospital to be treated, often supported by a chaperone. Many inpatients will be visited by friends and family.
    - Inpatient visitors do not always need to come in for follow-up meetings, but often will.

49. This demand will continue, regardless of any traffic interventions Oxfordshire County Council makes. Moreover, due to the scale of the Oxford hospitals' catchment areas, four in five patient-visitors, and four in five staff, will be travelling in from outside the city.

50. One other important factor comes into play here. We often hear comparisons between Oxford and Ghent, capital of East Flanders in Belgium. There is one very significant difference between the two cities, and the way in which healthcare is delivered. East Flanders has twice the population of Oxford but also has roughly 8-9 times the hospital beds, dispersed over the administrative area. By contrast, Oxfordshire has far fewer facilities, 75% of which are located in one city – Oxford.

Illustration 4.21: Hospital provision in Ghent

East Flanders – hospital provision – over 9000 beds including specialist beds



Only general hospital locations indicated, locations are approximate, information taken from Wikipedia

Illustration 4.22: Hospital provision in Oxfordshire

Oxfordshire hospital provision – 1641 overnight beds for half the population

Abingdon 42
Banbury 236
Bicester 12
Didcot 22
Oxford JR 832
Oxford Churchill 223
Oxford NOC 160
Oxford Community 20
Wallingford 22
Wantage 12
Witney 60

Total

51. We also looked at scanning facilities, on the basis that this illustrative of healthcare service that cannot be provided remotely. Again, the majority of scanning facilities are concentrated in Headington's hospitals.

Illustration 4.23: Locations of scanning facilities in Oxfordshire

Examples of Scanning facilities in Oxfordshire

Abingdon X Ray
Banbury Mammography
Bicester X Ray
Henley X Ray
Oxford JR Angiography, CT & MRI & X Ray
Oxford Churchill CT & MRI & X Ray
Oxford NOC Mammography
Witney X ray

52. These two maps explain why private car use is so essential for healthcare delivery. With the concentration in Headington of most of the hospital beds and most of the advanced scanning facilities, there is little wonder why patients from all over the county travel to Headington on a daily basis. Once again, we think it irrational to limit private car use within Oxford when it is so essential for healthcare delivery – particularly when no detailed analysis of the use of private cars within the healthcare system has been carried out by Oxfordshire County Council and their consultants, Steer Consulting, and particularly when no robust alternative has been put forward as part of the congestion charge scheme.

53. We acknowledge that part of the long-term strategic problem for Oxford's transport system is that Oxfordshire's health provision is mainly delivered in Headington. It is perfectly understandable from an NHS point of view why this has happened. By concentrating services, it enables better health delivery, and supports research and teaching. However, given the growing population and given the traffic problems it creates, we wonder for how much longer this is sustainable.

54. Time for a second recap: we have established as best we can with the available data, that the Headington Hospitals are Oxford's 2nd biggest "visitor attraction" – but a visitor attraction that has inadequate public transport options, for staff and patients alike. We have also established that demand, and the flow of cars and people, is inelastic, and will continue to come to Headington because of the concentration of county-wide health provision in Headington. In the short term to medium term, there is very little we can do about this – apart from not making access even worse.

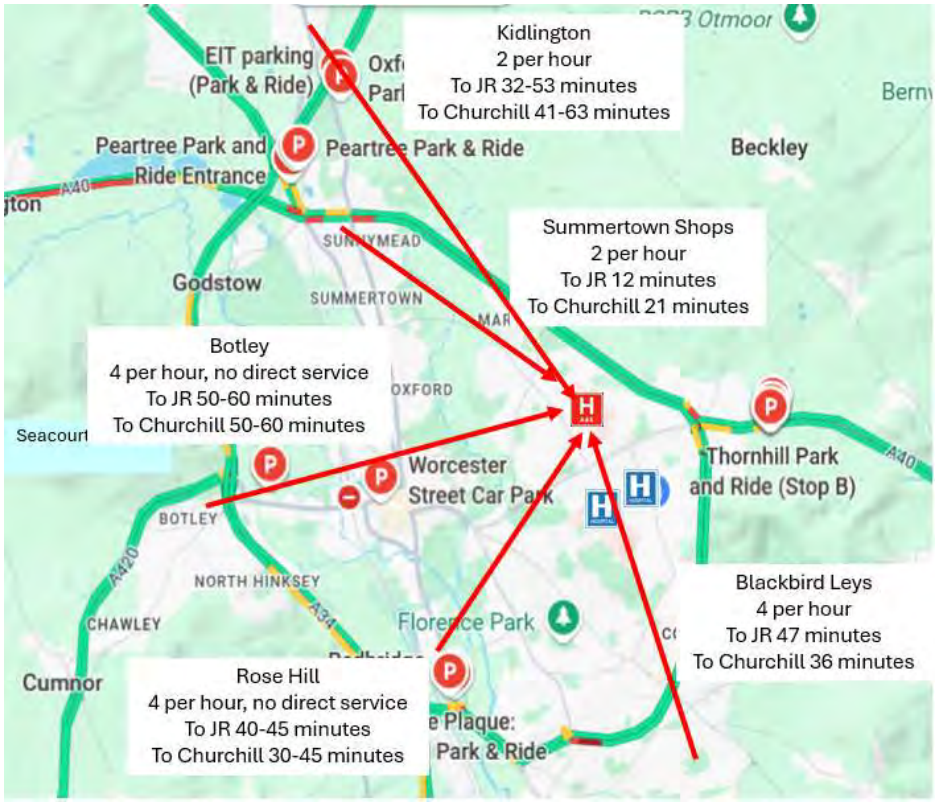
55. We now turn to non-park and ride bus provision across Oxfordshire, and its connections to the Headington hospitals. Drawing on bus timetables, red arrows denote direct services to the John Radcliffe, blue arrows denote non-direct services only. In order to realistically expect modal shift to buses from cars for visits to the John Radcliffe, there will need to be a significant improvement in bus frequency from each of these outlying population centres.

Illustration 4.24 Direct and non-direct bus services to the John Radcliffe Hospital

56. And now for Oxford City. We have mapped bus services and bus times from the major centres around Oxford City Centre. Remember, staff at the John Radcliffe are eligible for parking permits if public transport takes more than 45 minutes.

57. It appears staff living within the city boundaries in most of these outer centres are eligible for parking permits, as many services usually take around 45 minutes or longer, especially at rush hour. Obviously, cycling would be much faster than taking the bus. For example, cycling from Botley would take around 30 minutes. However, we appreciate not all staff can, or having worked a 12+ hour shift, want to cycle.

Illustration 4.25: existing park and ride provision to Headington's hospitals



Part two: the unhelpful role of mapping software in encouraging city centre traffic while also not facilitating modal shift

58. We now move on to mapping applications and their influence in directing traffic flows, causing congestion. We do not pretend to be experts in mapping applications. However, we have noticed inconsistencies that require explanation. This is because we believe mapping applications will have a significant impact on the implementation of congestion charge zones in Oxford. Part of the problem is that local and regular drivers will drive the routes they know. By contrast, visitors – especially irregular visitors – will use mapping applications to find the best route.

59. By way of background, Google Maps has been downloaded more than 10 billion times. It is therefore a reasonable assumption that, for many people travelling to Oxford's hospitals, they will use Google Maps or one of its main competitors. It transpires that the application mainly runs on an algorithm name A* algorithm (pronounced A Star algorithm).

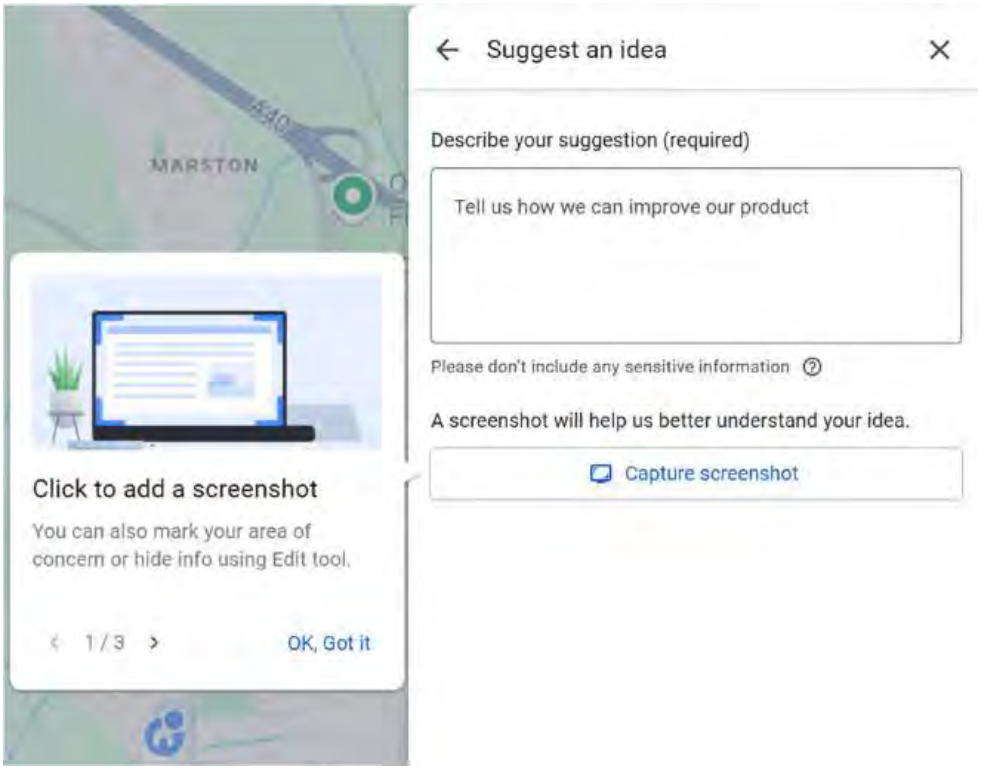
60. A * algorithm is very good at point-to-point route solutions. However, as we prepared this report, and considered how modal shift might take place, we realised that when we mapped a route into the hospitals, we were not offered a multi-modal solution. That is, the Google Map did not recommend that drivers to Oxford's hospitals to travel to a park and ride, take the bus, or cycle in. We understand that, on a global basis, algorithms struggle with multi-modal solutions, so generally do not offer them. However, because a core tenet of Oxford's transport strategy is to encourage modal shift out of cars, transport algorithms' collective failure to offer such a service presents a major problem for the council's policy, especially for hospital-bound visitors, who may well be infrequent visitors to the city.

61. Another issue is how the algorithm handles congestion charge locations. The algorithm will not know if a driver is an Oxford City resident (eligible for 100 permits per year) an Oxfordshire resident (eligible for 25) or an out-of-county Trauma Thames Valley regional catchment driver coming into the Headington Hospitals. Nor will the algorithm know how many permits the driver/car has used, and therefore whether they can use a specific route on a specific day or time of day. This matters: once the algorithm has been told the location and times of operation of the congestion charge, it will direct drivers accordingly.

62. A key component in Google Maps is the "Avoid tolls" option. When activated, this routing option should take the driver on routes that are toll free. We presume the congestion charge point will be treated by Google Maps as a toll point, rather than another form of vehicular restriction that the mapping software does not take account of: we invite Oxfordshire County Council to investigate this issue, as a matter of urgency. But, in any event, Google Maps will not offer park and ride as part of its routing option. When this option is not activated, it may – or may not – avoid the toll. Experimenting with the High Street Bus gate suggests that it will avoid the toll point, regardless of whether this option is activated or not.

63. It appears Google Maps is incorporating variable toll charges and times into its database. This opens up the option of using daily variations in toll point locations, and times, to influence the routes that the mapping application offers to drivers. We also note that Google Maps has a "suggest an idea" option. This option could be used to encourage the solution not to recommend routing visitors from outside Oxford to use the Donnington Bridge / Iffley Road / the Plain / St Clements route into Oxford's hospital district.

Illustration 4.26: Google Maps' ideas suggestion option



64. In summary, we believe part of the issue with using a congestion charge format to influence route selection is that many of the mapping software solutions will not offer the driver multi-modal solutions – a core objective of the Congestion Charge scheme. As a result, drivers will not readily opt for multi-modal solutions – particularly if going direct remains the quick option, and especially if they have permits available.

65. One other aspect of the proposed congestion scheme that undermines its traffic reduction objectives is its permit regime: notably, giving Oxfordshire drivers 25 permits per year, and offering patients requiring continuing treatment unlimited permits for two vehicles. Given that many County visitors to Headington hospitals will make few visits to the city centre each year, we suspect that many will use their permits to access Headington's hospitals, if their mapping software suggests this is the best route to take.

66. For visitors arriving from the north of Oxford, this is unlikely to pose problems – except for those who seek to access the hospitals via Marsh Lane during rush hour. A more significant issue is access from the south of the city, given that the optimum route is around The Plain. As Oxfordshire County Council has already pledged to give Oxfordshire residents 25 permits per year, we do not foresee a substantial drop in visitor traffic on the South route into the hospitals – as predicted by the Oxfordshire Strategic Model – unless mapping applications direct all traffic onto different routes.

Reappraising Steer's 2022 traffic filter Business Impact Assessment

67. Now to assess the impact of everything discussed so far, and to reassess the Steer Business Impact Assessment (BIA) for traffic filters, published in 2022. The section on hospitals in the Steer Business Impact Assessment for Traffic filters, page 34, reads as follows:

Illustration 4.27: Steer's business impact assessment for hospitals (narrative text)

	Hospitals
5.53	Health and care workers, and emergency workers are exempt from the traffic filters.
5.54	There may be a moderate labour market impact (specifically recruitment and retention) as a result of the longer journey times for car journeys which may influence the decisions of some hospital staff about work location.
5.55	As with schools, the impact of the filters may be more negative for the recruitment and retention of staff that travel by car from across the city (and who may be deterred or inconvenienced) by the filters with positive impacts for recruitment and retention of staff who rely on other modes (and therefore benefit from more improved journeys).

68. This is an extremely short assessment. Indeed, we believe this is a deficiently short assessment, given that we understand Oxford's hospitals turn over £1-2 billion a year in the Headington area alone, and treat 1-2 million people per year. At the very least, we might have expected Steer to have built out its analysis of modes used to travel to city Centre, included in its 2022 traffic filters BIA – especially given that, in 2022 document (figure 4.13), Steer had identified explicitly that around 50% of those working in Headington arrived by car. In its

2025 analysis, perhaps Steer could have conducted an analysis of visitors' journeys, similar to the previous city centre study, specifically by reference to the John Radcliffe Hospital? Or, at the very least, it could have republished existing research into visitor travel modes, published by the hospitals (or universities) themselves?

69. Yet, despite the apparent shortcomings of Steer's 2022 analysis, Oxfordshire County Council does not appear to have requested a more thorough analysis of this issue in the three years leading up to its proposals to introduce a congestion charge. Nor is there any evidence of a more detailed assessment, not undertaken by Steer, shared as part of the congestion charge consultation process. If Oxfordshire County Council has more extensive insights into the traffic impacts of the city's hospitals, it is not making them readily available.

70. Please also note: in the three paragraphs of cursory analysis undertaken by Steer, patients and visitors are not mentioned. Nor is the congestion that already exists around the hospital sites. Nor is there any explanation for how the congestion charge will affect the large flows of inbound and outbound traffic around the sites. In fact, given that the congestion charge scheme and the traffic filter scheme are likely to have a major effect on hospital operations, it is peculiar how little time Steer spent analysing the impact of the congestion charge on the city's second largest employer. Indeed, taking the wider view, Steer should not just have focused on the hospitals' status as major Oxford employers: they are also crucial to the lives and health of Oxfordshire residents, and beyond.

71. In light of these findings, presented to Oxfordshire County almost three years ago, we are bemused why the council has – seemingly – not made any significant efforts to understand the centrality of Oxford's hospitals to the city's traffic, as it seeks to implement its various traffic reduction strategies. As we have previously explained, there appears to be precious little connectivity between the Oxfordshire County Council's congestion charge proposals and the actual sources of Oxford's congestion, as identified in this report. We challenge the council to explain how we are wrong. Moreover, we ask the council to explain why any analysis in its possession was not published as part of the congestion charge consultation.

72. In the absence of any published research produced by Oxfordshire County Council or its retained consultants, we will now attempt to do so, by reference to hospital traffic. If access to the southern route into Oxford's hospitals is hindered by the congestion charge, then the only two viable routes will be via Horspath Driftway, the Slade and Old Road / Windmill Road or via London Road, as per the maps below, or Marsh Lane in Marston. However, as illustrations 28 – 30 show, these routes are already badly congested in the morning and evening rush hours. In our view, these roads have very little spare capacity to take additional traffic at these times.

Illustration 4.28: Post congestion charge routes into Oxford's hospitals for those without a permit or exemption

Hospital bound traffic from the north all focused down Marsh Lane between 7am to 9am and 3pm to 6pm

Hospital bound traffic from the south diverted via the ring road to approach Headington from The Slade and London Road

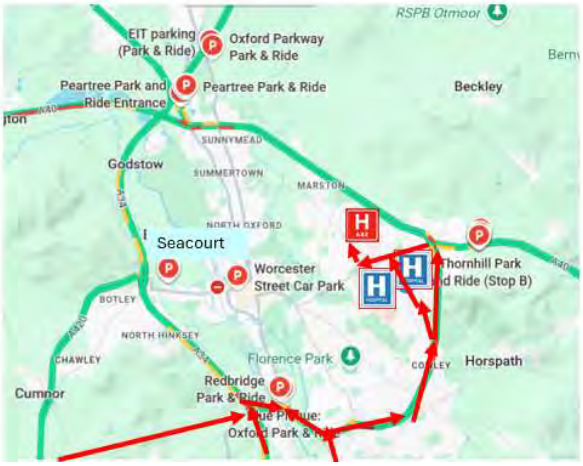


Illustration 4.29: At capacity – Marsh Lane in Marston during the morning rush hour

Illustration 4.30: At capacity – London Road in Headington during the morning rush hour

Illustration 4.31 At capacity - Old Road in Headington during the morning rush hour

73. In light of what we have learned to date, we now offer an alternative scoring for the business impact of the congestion charge proposals to that proposed by Steer, focusing specifically on hospitals.

Travel time

74. We were unable to find any written analysis of travel time changes around the hospitals in Steer's BIA. We will now (briefly) attempt our own. Assuming:

- the southern route via St Clement's will be closed off to any hospital visitor without a permit (including those who simply do not know about the congestion charge); and
- that two of the three northern routes inside the ring road (Marston Ferry Road and Hollow Way) will be closed between the hours of 7am to 9am and 3pm to 6pm to those without a permit; and

- given the volume of traffic will not reduce – partly because demand is inelastic, and partly because there are no active measures in the congestion charge proposal to reduce it, we propose a "Moderate Adverse" (-2) effect on travel time, for both staff and visitors.

Direct costs

75. Steer interpret direct costs as being good for bus companies and taxis, as their assets will spend less time in congestion – ignoring the congestion shifted elsewhere. The congestion charge points will deliver a positive benefit of +2 for those businesses. However, hospitals have very few assets passing directly through these congestion charge points, apart from ambulances which already have priority. For these reasons, we leave Direct Costs at 0.

Effect on business operations

76. In light of the direct and indirect (i.e. extra Marsh Lane traffic) route restrictions placed on hospital staff and (potentially) on visitors, we believe the congestion charge will be highly disruptive on business operations. As a result, we believe a -3 ranking is warranted.

Effect on business demand

77. We will interpret this as meaning "impact on patient and visitor demand for the hospitals". In light of the ever-growing demand for healthcare services, as the UK's population ages and grows larger, our assessment is that the congestion charge will have no effect on demand. Because patients will continue to visit Oxford's hospitals, we will keep the score as 0 – i.e. neutral, no significant benefits or disbenefits. The important point to make is that "visitor" demand is inelastic.

Finally, the effect on market – recruitment and retention.

78. In its short section on hospitals, Steer acknowledged that the traffic filters would have an effect on recruitment and retention. The more recent congestion charge technical note makes no change to that assessment. However, if the congestion charge points work as modelled, then the likely extra traffic around the ring road and on pinch points such as Marsh Lane will undoubtedly have an impact on hospital retention and recruitment. We believe a maximum score of -3 is warranted, not least because the impact of any result staffing and recruitment problems would have a significant and severe impact on Oxfordshire's entire health system.

Our updated business impact assessment for hospitals

79. We present our final score below. In sharp contrast with Steer's -1 score, our score is -8. We believe the congestion charge scheme offers no net benefits but does offer several significant disbenefits to Oxford's hospitals.

Illustration 4.32 Our alternative business impact on hospitals of the congestion charge

Business Type	Sub-group	Travel Time	Direct Costs	Effect on business operations	Effect on business demand / market	Effect on labour market- recruitment / retention
Public Sector	**Hospitals**	-2	0	-3	0	-3

80. One final point, which reinforces our assessment: the permit list shown in the congestion charge consultation documents do not include unlimited permits for health care workers based at Oxford's hospitals. It appears that whoever drew up the hospital section of Steer's BIA had not been briefed on the difference between community care and hospital health providers: community care providers are eligible for permits, hospital-based health care providers are not. As the permit proposal makes clear, permits will not be issued for commuters. And, so far as we can tell, hospital staff whose place of work is the hospital itself are regarded as just another type of commuter. As a result, they will need to abide by the conditions of the congestion charge scheme: 100 permits for Oxford residents, 25 permits for Oxfordshire residents, and no permits at all for those living outside Oxfordshire.

Illustration 4.33: The lack of congestion charge permit options for hospital staff

Permit type	Who can apply	Details
Unpaid carers	An unpaid carer living in, or caring for someone who lives in, the Oxford permit area. To qualify you will need to be either: • in receipt of carer's allowance • registered as a carer with your GP	One car per permit, which must be registered at your home address. Up to two people can apply for an unpaid carer's permit per care recipient address. The person who you're caring for must not live at your address.
Community health or care worker	Professional or voluntary health or care workers working for a qualifying social care or health care provider whose role regularly requires them to: 1. provide clinical health services or social care services at multiple locations in the Oxford permit area on the same day or; 2. urgently and at short notice travel to a location in the Oxford permit area to deal with any matter involving patient or staff welfare, building security or safety, or 3. transport patients to or from any hospital or healthcare facility in the Oxford permit area.	Up to three cars per permit, all of which must be registered at your home address. Only one car may be used on any one day. For business purposes only. The community health or care worker permit must not be used for commuting on days when no operational journeys are expected to be made. You must supply written confirmation from your employer (or the organisation you volunteer for) that you are eligible for this permit. Your employer (or the organisation for which you volunteer) must be a registered healthcare provider providing services in Oxfordshire or a relevant provider of social care services.
Frequent hospital patient	Patient required to attend multiple planned appointments at a hospital in the Oxford permit area	Up to two cars may be nominated per permit. The permit will be valid until your last planned appointment, or for 12 months (whichever is sooner). You can renew your permit after 12 months if you need to attend more appointments.
		The cars may be driven through the congestion charging locations free of charge only when being used for, or in connection with, the transport of the person needing to attend hospital appointments. The nominated cars can be changed as required.
Emergency or health service car	Qualifying emergency or health service provider	The car must be registered to the qualifying provider

OXFORDSHIRE COUNTY COUNCIL

Conclusions

1. As our analysis makes clear, Oxford's hospitals are a significant source of traffic and congestion in Oxford. Yet, remarkably, Oxford's congestion charge proposals – and the earlier traffic filters proposals – barely acknowledge this fact, let alone seek to mitigate it. We regard Steer's analysis of hospitals as deficient, and the scores it offers far too low.

2. We find Oxfordshire County Council's apparent incuriosity about this issue bizarre, especially in relation to its congestion charge proposals, to the point that we regard the council's blindness to be irrational. We directly challenge the council to demonstrate to us that they understand this issue better than we give them credit for, and to show how this understanding has informed the development of their congestion charge policy.

3. At present, we regard most alternatives to the car, especially park and ride, to be sub-optimal, and not currently an attractive choice, for hospital employees and visitors alike. We also note the less-than-helpful potential influences of mapping solutions in encouraging visitors travelling to Oxford from the south to travel in via the Plain. We encourage Oxfordshire County Council to explore this issue further, and see if mapping providers can be encouraged to discontinue this practice.

Chapter 5: Buses in Oxford – solutions that could help services in the city, and "solutions" that won't

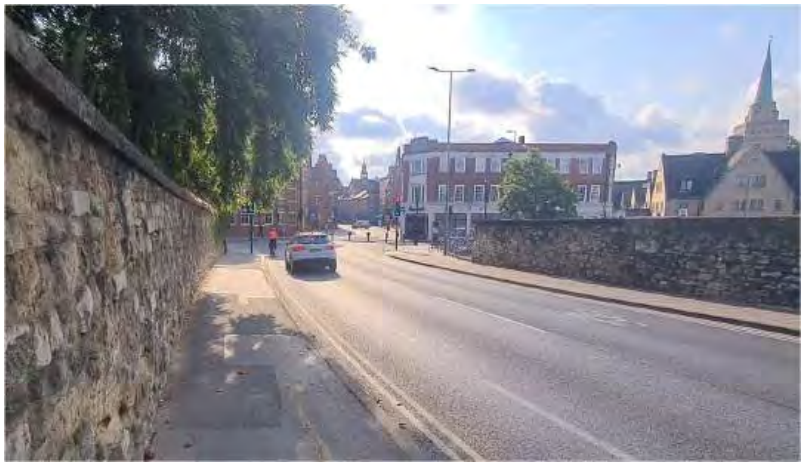
Introduction

1. This chapter has two main sections. In the first section, we express strong doubts that Oxfordshire County Council's congestion charge proposals will help improve bus services – mainly because there is little connection between the proposed congestion charge checkpoints, bus routes, and locations where congestion occurs. In the second section, we suggest improvements to bus services in Oxford, with a specific focus on park and ride services. We do so with the aim of offering practical ways of reducing car usage in Oxford, by proposing measures that seek to rectify genuine causes of congestion in the city.

Part one: The irrationality of Oxford's congestion charge scheme as a method of delivering bus service improvements in Oxford

2. To recap: one of the stated justifications for Oxfordshire County Council's proposed congestion charge scheme is to help it meet its target of reducing bus journey times in Oxford by 10%[116]. As previously discussed, this objective was agreed by Oxfordshire County Council and Oxford's main bus companies as part of a bid to secure electric bus funding under the "Zebra" scheme. Yet, as previously highlighted, two of the six proposed congestion charge sites – Hythe Bridge Street and Thames Street – currently have no bus services operating on them. Nor would it make sense to run any bus services on Thames Street, in particular. This is because a mainly bus-only street (Speedwell Street) already runs alongside Thames Street for much of its length, providing traffic-free passage for buses across this part of the city centre.

Illustration 5.1: Hythe Bridge Street, 14 July 2025, 8:15 – congestion charge location



[116] Oxfordshire County Council. Successful funding bid is set to bring 159 electric buses to Oxfordshire. 29 March 2022. Available here.

Illustration 5.2: Thames Street, 14 July 2025, 7.55. Congestion charge location

3. Meanwhile, the free-flowing Marston Ferry Road and St Cross Road currently only run a handful of bus services along their (largely free-flowing) length. On these two roads, there is plenty of capacity to run extra bus services, without any additional restrictions on cars.

Illustration 5.3: Marston Ferry Road, 25 February 2025, 7:47am -congestion charge location

Illustration 5.4: St Cross Road, 23 June, 8:01am – congestion charge location

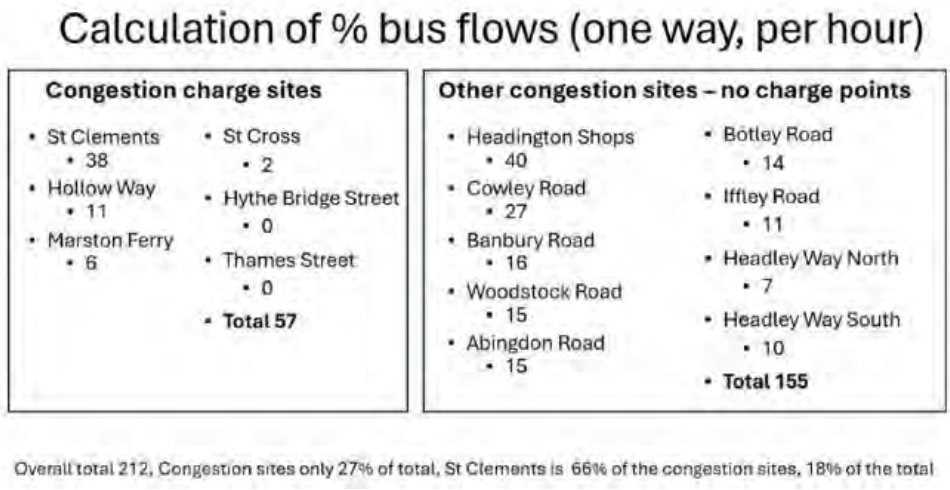
4. Hollow Way and St Clements are bus routes, proposed congestion charge ANPR checkpoints, and (sometimes) are busy with traffic. But, as we explained in chapter one, neither of these roads is congested to the extent that a 7am – 7pm, seven-day-per-week congestion charge becomes a proportionate policy response. For much of the day, our analysis based on Google Maps' "typical traffic data" indicates that delays on St Clements can typically be counted in seconds, not minutes, mainly in one direction. At the worst periods of the evening rush hour, we have calculated that eastbound congestion in St Clements can typically be cleared in six minutes, due to the road's short length. Hollow Way has a similar congestion profile. In Hollow Way, the average congestion clearance time travelling south towards Garsington Road is around 3.5 minutes.

5. Of course, these are averages, smoothed over an entire year. However, like the photos in this chapter – all taken during weekday rush hour during the state school term time – these findings do not indicate a year-round congestion emergency across the entire city.

Illustration 5.5: St Clements, 7 July 2025, 7.55am -congestion charge location

4. The lack of bus services on several of the proposed congestion charge checkpoint routes is an oddity in its own right. The rationale for the scheme becomes even more tenuous when Oxford's wider bus network is considered. If our provisional findings – shown below – are confirmed, it appears that, on a typical hour on a typical day, just 27% of Oxford's buses will operate on routes that run past a congestion charge checkpoint. In light of this low percentage, it is unclear how the congestion charge scheme will improve Oxford's bus network to the extent to which the scheme becomes a proportionate policy option.

Illustration 5.6: one-way bus flows in a typical hour – congestion charge sites and other key locations in Oxford



5. Notably, several major bus routes are not included in the proposed congestion charge scheme. Here, the standout example is Headington: with 40 bus services passing each way through this neighbourhood in a typical hour (so 80 in total), Headington appears to be the logical place to begin, if one is taking an evidence-based approach to bus service improvement. Not only is Headington one of Oxford's most important bus passages, but the neighbourhood also suffers from chronic peak-time congestion.

Illustration 5.7: London Road, Headington, 2 July, 8.08am – no congestion charge

6. We appreciate that sections of London Road in Headington benefit from bus lanes. However, these bus lanes disappear around the Headington shops area. As a result, bus services must compete with heavy traffic on a daily basis. And, because much of this traffic is hospital-related, the fall-off in congestion is less pronounced in Headington during the summer months, compared with elsewhere in the city. Yet, despite Headington being both a congestion hotspot and a major bus route, no congestion charge for this area is planned.

Illustrative 5.8: typical bus services each hour, each way, including on proposed congestion charge checkpoint locations

AR= Abingdon Road
BR = Botley Road
BBR = Banbury Road
CR = Cowley Road
HBS = Hythe Bridge Street
HS = Headington Shops
HW = Hollow Way
HWN = Headley Way North
HWS = Headley Way South
IR = Iffley Road
MFR = Marston Ferry Road
SC = St Clements
STC = St Cross Road
TS = Thames Street
WR = Woodstock Road

7. Meanwhile, Botley Road (14 buses each way per hour) has endured a wholesale curtailing of its bus routes for more than two years, as a result of the Botley Road closure[117]. During this entire time, Oxfordshire County Council has not intervened – it did the opposite, in fact. Yet suddenly, just months before the December 2025 deadline for delivering city-wide bus service time improvements, the council blindsided its entire population with a congestion charge proposal it had previously rejected as unworkable less than three years before.

8. Of course, we appreciate that curtailing access to Thames Street would undoubtedly improve the service on Abingdon Road, which has demonstrably deteriorated since the Botley Road was closed. But an equivalent observation can be made about bus services in Oxford and Cowley, which have been significantly harmed by Oxfordshire County Council's LTN policies. In a typical hour, far more buses use Cowley Road (27 each way) than Abingdon Road (15) – yet no vehicular restrictions are proposed for Cowley Road – or improvements planned. Similarly, Iffley Road (11 buses each way per hour), a notorious congestion hotspot during the private school term, will have no new restrictions imposed on it, whereas the nearby St Clements will. Of course, the best way to improve bus services on all these roads is not to introduce yet more restrictions on cars. Rather, it is to remove the LTNs.

[117] Network Rail. New programme launched to reopen Botley Road summer 2026. Available here.

Illustration 5.9, Iffley Road, 26 June 2025, 8:09am - no congestion charge

9. What is more, as we explain in chapter six, it is plausible that the introduction of the congestion charge will cause significant economic harm to businesses across Oxford. Here, we argue it is the council's responsibility to consider the economic and social well-being of the entirety of Oxford and Oxfordshire, ahead of the narrow sectional economic interests of its bus companies, especially in response to a localised, time-limited issue affecting the bus companies' services.

10. Furthermore, in seeking to improve the bus services on Abingdon Road, the council's own modelling data suggests that displacement of traffic will occur in other locations across the bus network, particularly at Oxford's edges. It is predictable that bus services in this part of the city will suffer as a result. We have, for example, established that traffic levels are predicted to increase on Garsington Road (a road with at least six bus routes) by up to 25% as a direct result of the congestion charge being introduced[118]. This information was extracted from Councillor Andrew Gant via residents' questions, after the Ricardo analysis failed to provide impact data on this road in its evaluation report.

11. Ricardo's published modelling also suggests that traffic levels will increase by 5% on Marsh Lane, a road that is already at full capacity during the morning rush hour. This road connects Oxford city centre and the John Radcliffe Hospital via the number 14 bus route. Traffic is also predicted to increase on the Woodstock Road as a result of the congestion charge/traffic filters scheme near the Wolvercote roundabout. As a result, Oxfordshire County Council has switched the bus lane to a different carriageway ahead of the traffic filters launch[119], to alleviate a predicted new congestion problem entirely of its own making.

[118] Andrew Gant: written response to Mehmet Karakus, Meeting of Oxfordshire County Council, 8 July 2025, 10:30am. Response on file with author.
[119] Oxfordshire County Council. Woodstock Road sustainable travel improvements. Available here.

Illustration 5.10, Marsh Lane, 23 June 2025, 7.04am - no congestion charge

Conclusions

12. We have tried, and failed, to comprehend how the proposed congestion charge scheme will help improve Oxford's bus services, beyond a narrow benefit delivered to a small number of bus routes close to Abingdon Road. We suspect that no such wider benefits can be demonstrated, on the basis that the proposed congestion charge "solution" is – fundamentally – ill-fitted to its stated purpose.

Part two: How improvements to park and ride could help actually relieve actual sources of traffic and congestion in Oxford.

13. In this section, we entirely disregard Oxfordshire County Council's proposed congestion charge proposal, in light of what we regard as very weak evidence justifying its deployment. Instead, this section explores how improved bus services might help alleviate actual, observed causes of congestion, as previously identified in chapters three and four. That is: hospital traffic and private school traffic.

14. The singular focus of this section is park and ride provision, rather than bus services more generally within the city. We focus on park and ride services in light of our previous findings: that a significant element of Oxford's traffic is caused by visitors based outside the city making point-to-point visits to locations on the city's edges. These types of journeys, especially those made regularly – i.e. by hospital staff[120], private school pupils – potentially lend themselves to a modal shift from cars to buses.

15. Starting with hospital traffic and potential hospital patrons. Here, our proposals draw on established principles of process improvement. In our view, Oxford's park and ride offering is not currently delivering what a significant percentage of potential hospital patrons want.

[120] Oxford University Hospitals NHS Foundation Trust. Healthy Travel Strategy: 2025 – 2027, A framework for travel strategy for the John Radcliffe. Acting CEO's forward. Available here.

16. This is due to:
    - The highest frequency bus services running east-west, when we suspect most hospital staff and visitors tend to come from the county's major population centres in the north and south;
    - The current north and south located park and ride services – Oxford Parkway in the north and Redbridge in the south are too infrequent, and too slow.

17. The current situation is one reason – we believe – why many drivers do not use park and ride services, and instead drive to their destinations in the city's outer edge – especially its hospital district. From every direction, park and ride is too slow. And, apart from Thornhill, the services are also too infrequent.

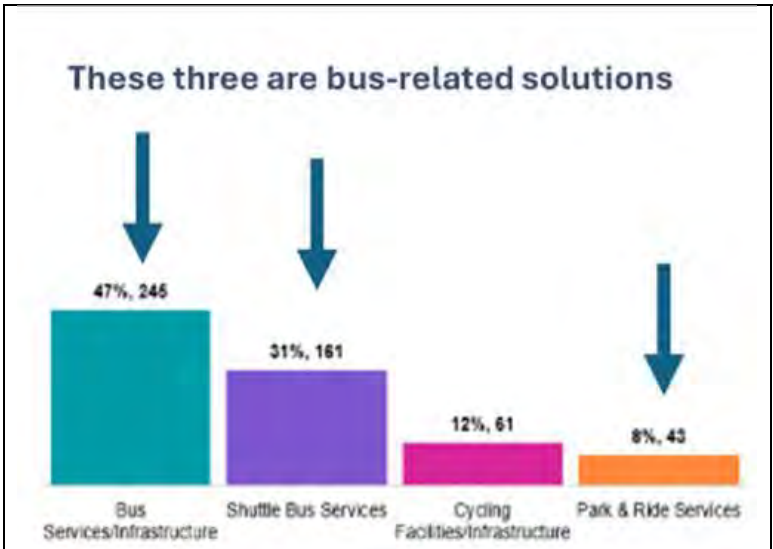
18. We believe that "doing what the customer wants" entails providing many more bus services from the directions they are travelling from, i.e. from the north and from the south. We assume that hospitals will have access to extensive data, both in relation to their own workforce and the home addresses of their patients: we believe this data should be evaluated, to the maximum extent permitted by data protection laws, to help devise park and ride services that match provision with demand.

19. We believe that park and ride can work, and enable modal shift, if it is significantly revamped to meet the needs of staff and visitors to the Headington hospitals. Here, a key metric should be that the service should match, or improve on, typically point-to-point driving times.

Illustration 5.11: Our proposal for a comprehensive park and ride hospital service, using Oxford's ring road

20. Agreeing with the findings of evidence collected by Oxfordshire University Hospitals NHS Foundation Trust (OUH) (below), we support the deployment of express park and ride services, where such services might be used by hospital staff, patients, and members of the public alike. Where demand mainly comes from hospital staff, express shuttle bus services should be offered, where the capacity offered closely matches demand. We do not advocate a complete modal shift away from cars, on the basis that such a policy would be unrealistic, in light of shift lengths and distances to work often travelled.

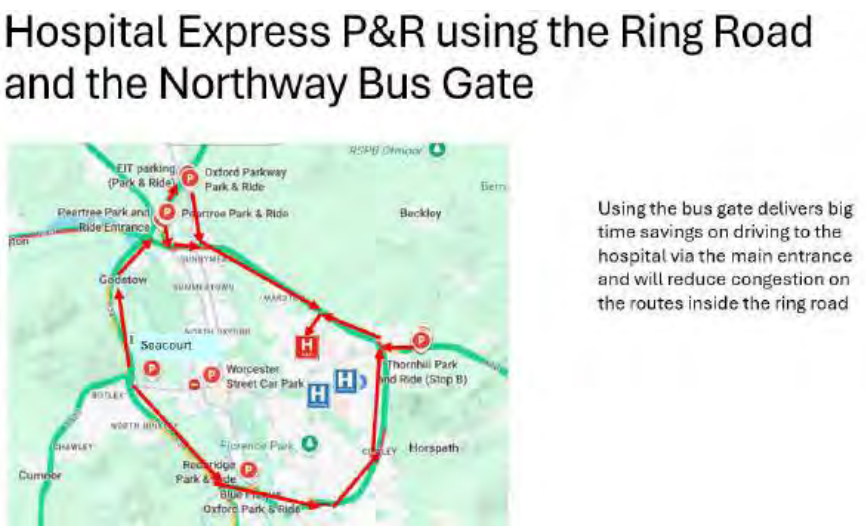
Illustration 5.12: Delivering what people want - service that might prompt OUH staff to ditch their cars



"Limited-stop bus-based solutions, such as express P&R services, and shuttles from key locations were consistently ranked highly throughout the survey and focus group findings. Conclusion: Important for Trust to push for these options with County, bus companies and work with other Headington employers."

21. To make the modal shift truly attractive, a key objective should be to make it quicker than driving. How might that be achieved? Here, our principal recommendation is to connect all of Oxford's parks and rides to its Headington hospitals via the ring road, which is generally the fastest road in the city. We do not believe it is conducive to an express service for it to travel through suburban Oxford roads in Marston and Headington, many of which now have 20mph speed limits. We also advocate, where helpful, making use of the Barton Park bus gate, where Foxwell Drive in Northway meets Oxford's northern bypass ring road.

Illustration 5.13: Proposed hospital express park and ride services using the ring road and the Barton Park Bus / Northway bus gate



22. Using Google Map times, we expect to see a reduction of roughly 30-60% in travel times between the park and ride sites and the John Radcliffe Main entrance bus stop, by adopting this approach. As table 5.14 below shows, a journey via this route will take approximately nine minutes, compared with around 15 minutes currently. Faster trip times also mean that more bus trips can be made every hour, generating more capacity, more revenue, and the service reliability that customers require.

Table 5.14: Hospital express park and ride to main entrance bus stops using Barton Park bus gate – travel time estimate

Hospital Express P&R to Main Entrance bus stop using Saxon Way entrance - travel time estimates

		Timetable time from P&R to Main Entrance (bus no.)							From P&R inc walk							
Express P&R from	RCO Estimate to Saxon Way entrance	400/14	400	600	X3	X32	H2	700	8	Walk	Cycle	Drive to main entrance	Time saving RCO estimate versus driving	Time saving %	Time saving RCO estimate versus best bus time	Time saving %
Thornhill	9		26	16			25		23	43	11	10	1	10%	7	44%
Oxford Parkwa	12							23		94	23	12	0	0%	11	48%
Seacourt	21	52								80	25	21	0	0%	31	60%
Redbridge	20			60	30	30				78	22	18	-2	-11%	10	33%
Peartree	14						31			87	23	13	-1	-8%	17	55%
Eynsham	20									195	46	20	0	0%	N/A	

Time savings range from a minimum of 33% for Redbridge P&R to 60% for Seacourt, with Thornhill at 44%.

Short duration services will require less buses and enable high frequency while delivering higher capacity every hour

23. We appreciate the potential challenges of opening up the Northway bus gate to frequent park and ride services from the Ring Road, not least because this would involve additional buses passing through a residential area. However, unless these challenges can be overcome, we do not believe that park and services will be able to match point-to-point driving times, our main benchmark for success.

24. We also recognise the need to make such services commercially viable. Running faster buses, point to point, with only two stops – the P&R site and the hospital – should yield better fleet utilisation, and higher customer volumes and revenues.

25. We suggest that additional park and ride capacity might need to created, located directly alongside the ring road, in close proximity to Oxford's hospitals. As a low cost interim measure, we suggest exploring the possibility of using part of the BMW car parks, parking capacity on the Oxford Business Park in Cowley, and the disused car park near Cowley Tesco, on the Oxford Retail Park. We cannot understand why land immediately adjacent to the Barton Park bus gate, off the ring road, has not been secured as a hospital car park.

26. To make park and ride a viable option for Oxford's hospital workforce, capacity issues need to be addressed. Currently, park and ride services arriving at Oxford's hospitals around the time of the 7am / 7:30am shift change do not have sufficient capacity to make park and ride a viable option at scale. We illustrate this point in table 5.2 below. With 483 seats available

for the 7am shift and 414 seats available for the 7.30am shift, we suspect there is a large shortfall in seat capacity between what is currently provided and what is needed. Not being able to get on a bus ahead of a shift start due to capacity constraints is an obvious disincentive to attempt to use the service again.

Table 5.2: Current capacity constraints at park and ride services during hospital shift change over period

		Major	Minor	Scheduled time to Main entrance (minutes)	Departure time to 7.00 shift start (minutes)	No. of buses arriving 20 minutes before 7.00am shift start (allowing for walking 400 & 8)	Seat capacity for the 7am shift	Departure time to 7.30 shift start (minutes)	No. of buses arriving 20 minutes before 7.30am shift start	Seat capacity for the 7.30am shift
Parkway	100/700	2	17	26	39	1	69	33	1	69
Pear Tree		N/A	N/A	N/A						
Rail Station	14	5		27	35	1	69		0	
Redbridge	600	8	32	60						
Redbridge	X3	5	29	38						
	X3									
Redbridge	X32	4	16	20	42	1	69	45	1	69
Redbridge Total		9								
Seacourt		N/A	N/A	N/A						
Thornhill	H2	6	18	25						
Thornhill	600	1	9	14	30	1	69	30	1	69
Headington Shops	400	1		8	43	3	207	43	3	207
Other buses	ST2									
				Average	38	7	483		6	414

27. An acute lack of current park and ride capacity is another reason why we believe it is irrational for Oxfordshire County Council to introduce a congestion charge now, without first putting in place suitable mitigation measures. As previously stated, we estimate that around 80% of the John Radcliffe staff and – by extrapolation – 80% of the 19,000-20,000 staff who work at the Headington hospitals, live outside the city. For every 1,000 members of staff, we estimate 14.5 double-decker buses will be required, assuming they are fully loaded. However, at present, there is approximately half that capacity around the start time of a typical hospital shift. Modal shift cannot happen if there is not sufficient capacity in place.

28. Turning now to those travelling to Oxford's Headington hospitals from the south. We support measures to curtail the southern route traffic flow via Donnington Bridge, Iffley Road and the Plain – including encouraging mapping software, such as Google Maps, to offer this route.

29. Oxfordshire County Council's preferred solution is, of course, to place a congestion charge checkpoint on St Clements. But, as we previously discussed in chapter four, this approach is likely to be ineffective, for two main reasons. Firstly, many staff arrive at Oxford's hospitals before 7am. As a result, the St Clements congestion charge filter will only affect outbound journeys. This has the potential to put even more pressure on Headington, as drivers seek to avoid the charge when travelling home from the hospital. Secondly, we believe that many visitors to the hospitals will continue to travel via St Clements, especially if they are only occasional visitors to the city, because their permits will allow them to do so.

30. In our view, the most pragmatic approach to this issue is to incentivise, though carrots and not sticks, regular visitors to the John Radcliffe from the south to use an express park and ride service from Redbridge, making the service more attractive than travelling by car. This service would free up capacity for those staff and patients who cannot realistically make such a shift, and should not be forced to try.

31. The three rules of adding value are
    - Do what the customer wants
    - Get it right the first time
    - Deliver change and transformation

32. We believe that providing fast and frequent park and ride services, which patrons want to use, could result in a significant modal shift – enough to reduce congestion around the John Radcliffe Hospital considerably. To succeed, the best possible routes must be offered, at the best price and at the right capacity, to ensure the service is both attractive to users and commercially viable. By doing the above, we believe it is possible to finally deliver the change and transformation that Headington's hospitals need.

33. Moving now onto Oxford's schools – and, in particular, its private schools, which tend to have large catchment areas. Helpfully, both of Oxford's private school clusters – in north Oxford and Headington / central are within convenient access of two of Oxford's park and rides – Peartree in the case of North Oxford, Thornhill in the case of Headington / central Oxford.

34. We have identified three main challenges that currently make driving children to school a rational default option, compared with park and ride.
    - The children's age. This is obviously an intractable problem, largely immune to policy interventions.
    - The fact that the park and ride services are not currently open to school buses; only now is Oxfordshire County Council tentatively considering this option.
    - The fact that several conventional bus services close to the Peartree have total journey lengths that some will not find appealing.

35. To explain this last point. Table 5.3 below sets out the total journey times from Peartree park and ride on a typical weekday morning to north Oxford's main North Oxford private schools, at approximately 8am. A typical bus journey is fairly short, reflecting the short distance and the lack of traffic in the area at this time of the morning. More problematic is the walking time. On occasions, this can take far longer to complete than the bus journey itself. Walking times of around 10 minutes are unlikely to be problematic for older children, such as pupils at schools such as d'Overbroeck's (age range 11 – 18) or St Edward's (age range 13 – 18). However, they may well become so after this time period, especially for walking distances of more than 15 minutes. Public bus use – in general – may also be unviable for schools with younger intakes, such as Summer Fields School (age range 4-13), or Dragon School (4-13).

36. In light of the above, we suggest two possible options should be considered, both utilising Pear Tree park and ride. Firstly, the operators of this site (i.e. Oxford City Council) should consider opening up the facility for school buses, to allow schools to operate their own peak time, point-to-point, shuttle buses between Pear Tree and their main teaching north Oxford sites. Secondly, in light of the (relatively) close proximity of the schools to each other, consideration should also be given to the possibility of the viability of running a generic

shuttle bus, visiting most schools in quick succession – in a manner similar to the one already in operation involving Headington Rye and Magdalen College School[121]. Here, Oxfordshire County Council could potentially play a convening role in securing cooperation between schools to launch this service, if it were deemed more viable than individual schools running their own shuttle bus service.

Table 5.3: Journey times – bus and walking – from Pear Tree park and ride to Oxford's main North Oxford private schools

School	Bus service and bus journey times in minutes	Walking time (either end)
d'Overbroeck's Oxford	300 (9 minutes); S3 (5 minutes); H2 (8 minutes); X4 (3 minutes)	300 (walk 12 minutes); S3 (11 minutes); H2 (16 minutes); X4 (21 minutes).
St Edward's School	300 (9 minutes); S2 (3 minutes); S3 (6 minutes).	300 (6 minutes); S2 (16 minutes); S3 (6 minutes).
Summer Fields School	300 (9 minutes); S3 (7 minutes); H2 (12 minutes); X4 (5 minutes).	300 (9 minutes); S3 (13 minutes); H2 (17 minutes); H4 (22 minutes).
Oxford High School	6 (7 minutes); 300 (9 minutes); S2 (7 minutes); S3 (11 minutes)	6 (26 minutes); 300 (18 minutes); (23 minutes); S3 (14 minutes),
Wychwood School	300 (15 minutes); S2 (9 minutes) S3 (13 minutes); X4 (9 minutes)	300 (7 minutes); S2 (19 minutes); S3 (10 minutes); X4 (22 minutes).
Dragon School	300 (15 minutes); S2 (9 minutes); S3 (13 minutes); X4 (9 minutes)	300 (12 minutes); S2 (23 minutes); S3 (14 minutes); X4 (26 minute).

37. In the East Oxford / Headington area, we are aware of the existing bus partnership between Headington Rye and Magdalen College School[122]. Whether this service would benefit any further from an additional drop-off and pickup point at Thornhill park and ride, we defer to the interested parties in terms of whether the scheme is needed – noting that the former Oxford Schools Bus Partnership often required pickups to take place near, but not within, park and ride facilities[123]. However, should the key stakeholders express interest in this option, we suggest Oxford City Council and Oxfordshire County Council should both actively facilitate such an opening up. We do so for four main reasons: firstly, running such a service could take pressure of Iffley Road, which is highly congested in the mornings during private school term times; secondly, the route between Thornhill and Headington Rye / Magdalen College School is direct, taking a maximum of 25 minutes in total; third, a significant element of it has the benefit of either bus lanes (in Headington) or quiet roads (Headington Hill). Thirdly, the age range of Magdalen College School pupils (7-18) – specifically – make independent travel a viable option, especially for its older pupils.

[121] Headington Rye Oxford. New Joint Bus Partnership. 13 January 2023. Available here.
[122] https://www.thisisoxfordshire.co.uk/news/25335043.magdalen-college-school-hits-back-congestion-charge-claim/
[123] Oxford School Bus Partnership. Former routes available here.

Conclusions

38. This chapter starkly demonstrates the difference between evidence-based policy making and policy-based evidence making. In our proposals to improve Oxford's park and ride, our starting point is that Oxford's hospitals are demonstrably a significant cause of traffic and congestion in Oxford, and that workable solutions should be developed to overcome this problem. The focus of these proposals is to offer an enhanced service that is attractive to a defined potential client base, because it is quicker and more convenient than using a car.

39. A similar principle is applied to our proposals regarding private school park and ride access: first, we have sought to establish what appears to be sub-optimal about the existing provision (walking distances may be too long). Then, we suggest how this specific problem might plausibly be rectified by offering solutions that key stakeholders may want, and can be cost-effectively delivered. The fact that private schools previously picked up pupils near, but outside, park and ride facilities, under a previous scheme indicates to us that our proposal is worth exploring.

40. In stark contrast, Oxfordshire County Council's congestion charge proposals appear to be a policy "solution" that does not withstand the most basic of scrutiny – namely, that the proposal will impose a congestion charge on several key arterial roads that carry few, or no buses, and are not congested for much of the day even if they do – while simultaneously not rolling out the scheme on major bus routes that are also congestion hot spots. Worse, the council's "solution" is highly likely to harm bus services elsewhere in Oxford via traffic displacement, while also harming Oxford's wider economy. Oxford's residents deserve better than this.

41. We call on Oxfordshire County Council to break its self-imposed path dependency to impose a variant on its Connecting Oxford / traffic filter / congestion charge scheme, to which it is seemingly irrevocably committed. Instead, we invite the council to consider the evidence we put forward in this report, which we consider to be highly relevant to the congestion charge proposal now being made. We invite the council to seek to provisionally validate our finding through observation and, in light of this, entirely scrap the congestion charge – and its successor traffic filter scheme.

42. Returning to first principles, we invite Oxfordshire County Council to seek to develop congestion reduction policies that recognise and address congestion where it is actually occurs. This, in turn, we believe, allows it to move toward a far more "carrots" based scheme of traffic reduction, based significantly around supporting hospital workers and private school children switch their journeys into Oxford from the private car to park and ride.

Chapter 6: The economic impact of the congestion charge: likely winners and losers identified

Introduction

1. Oxfordshire County Council plans to introduce the congestion charge in the immediate run-up to Christmas – for the city's retail, hospitality and theatre sectors, its key trading period. Given the significant potential for the scheme to cause significant disruption to all of these sectors, one might reasonably have thought the council's proposals was supported by a comprehensive assessment of the scheme's likely impact on the city's businesses. In fact, there is no such evidence of such an assessment. Instead, the "business impact technical note"[124], presented on the council's congestion charge consultation page, is just three and a half pages long, comprising less than 1,000 words of narrative text. Moreover, almost a third of this is simply a restatement of what is already known about the congestion charge – namely, permit eligibility.

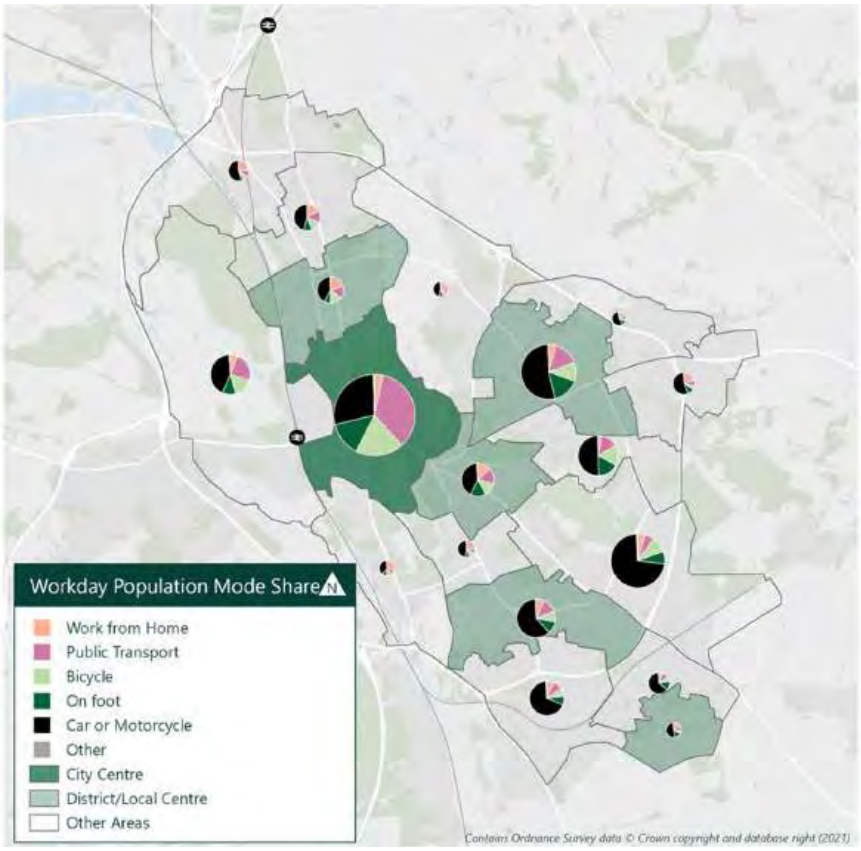
2. Also included in this 3.5 page summary is a synopsis of the (related) traffic filter business impact assessment report, first published in 2022 by Steer[125]. This study is considerably more thorough than the congestion charge business impact technical note, in that it at least seeks to quantify the nature of businesses operating in Oxford. The 2022 Steer study also identifies travel to work modes of transport, drawing on 2011 census data – used in light of the acknowledged unreliability of more recent census data, collected during the pandemic. The Steer report, therefore, provides us with a baseline understanding of the potential impact of vehicle restrictions on the city's workforce, even if some of its insights are based on outdated 2011 census information.

3. Taking account of the important qualification of this data source, one of the more notable aspects of this finding is that the planned congestion charge would mostly be implemented in a part of Oxford where relatively few workers commute into work by car or motorcycle – just over a quarter. This is therefore an odd location for a congestion charge to focus on.

4. By contrast, the high prevalence of travel to work by car, identified by Steer in the city's easterly edge, is almost certainly due to this area's strong focus as a hospital district. We previously covered this topic in considerable detail in chapter four. For now, we shall simply restate that the NHS trust running Oxford's hospitals recognises that its operations are a significant source of local traffic and congestion, due to a large majority of its workforce travelling by car126. Oddly, the congestion charge will not directly place new restrictions in these areas, especially in Headington. Headington is also a major bus corridor.

[124] Oxfordshire County Council. Oxford temporary congestion charge: update to traffic filters business impacts assessment. June 2025. Available here.
[125] Steer. Oxford Traffic Filters Business Impacts. October 2022. Available here.
[126] Oxford University Hospitals NHS Foundation Trust. Healthy Travel Strategy: 2025 – 2027, A framework for travel strategy for the John Radcliffe. Acting CEO's forward. Available here.

Illustration 6.1: Travel to work route by mode of transport (2011)



5. The 2022 Steer report put what might euphemistically be called a "positive gloss" on the impact of the traffic filters scheme. Overall, the report predicted "moderate" beneficial impacts on travel times, but also largely neutral impacts on direct costs, business operations, demand / markets. This is a curious conclusion to reach, given that when similar schemes were introduced elsewhere in the country (notably Aberdeen[127]) saw significant falls in footfall, directly afterwards. Likewise, the positive predicted outcome on HGV operators is also odd, in light of Ricardo's recent modelled projections of increased traffic on Oxford's eastern bypass – including in the immediate vicinity of BMW's Mini car factory, a stretch of ring-road heavily used by HGVs.

6. The only (slight) negative impact identified in Steer's analysis was on the public sector recruitment and retention. Here, the report noted the potential for "moderate labour market impact" (i.e. a negative impact) on the health sector, "as a result of the longer journey times for car journeys which may influence the decisions of some hospital staff about work location." Likewise, the report also noted the potential for increased journey times "on recruitment of staff who commute by car". We previously discussed the congestion charge's likely impact on healthcare workers, in chapter four.

[127] Aberdeen & Grampian Chamber of Commerce. ChamberTalk: City centre footfall plumets by a million since August. 15 May 2024. Available here.

Table 6.1: traffic filters business impact study (2022)

Business type	Sub-group	Travel time	Direct costs	Effect on business operations	Effect on business demand / market	Effect on labour market- recruitment& retention
Directly affected (transport and distribution)	Taxi operators	2	0	0	1	0
	PHVs	2	0	0	1	0
	Businesses with fleets of vehicles	2	1	0	0	0
	Bus operators (public buses)	2	1	0	1	0
	Bus operators (private buses/coaches)	2	1	0	1	0
	HGV operators	2	0	0	0	0
Businesses operating in Oxford (General)	City centre	2	0	0	0	0
	District centres	2	0	1	0	0
	Other	2	0	1	0	0
	Outside Oxford	0	0	0	0	0
Businesses (Consumer services)	City centre	1	0	0	1	0
	District centres	1	0	0	1	0
	Other	1	0	0	0	0
	Outside Oxford	0	0	0	0	0
Public sector	Schools	0	0	1	0	-1
	Hospitals	0	0	0	0	-1
	Universities	0	0	0	0	0

7. In light of what we regard as a suboptimal attempt by Oxfordshire County Council to identify likely impacts of the congestion charges on businesses, this report attempts to begin the processes of doing so, independently. Evidence is drawn from various sources to assist with our analysis, including:
   - Business impact analysis of the impact of previous restrictions on vehicles elsewhere in the city / county / country, where similar schemes have been introduced;
   - Traffic/congestion modelling data for this particular scheme, as provided by Oxfordshire County Council / Steer / Ricardo and others.
   - Business impact reports relating to previous transport-related Oxfordshire County Council initiatives impacting the city – largely undertaken by businesses and residents themselves, due to a lack of interest in doing so by Oxfordshire County Council.
   - Additional sources (theatre start times, councillors' responses to questions etc), which indicate plausible impacts of the congestion charge on Oxford's various business districts.

8. This chapter also includes a critique of Oxfordshire County Council's proposed approach to evaluate business impacts following the planned introduction of the congestion charge scheme. We further note the council's repeated refusal to expand the scope of its business impact monitoring, despite being asked to do so by various stakeholders on numerous occasions.

Background and context: who won't be affected by these schemes, and who likely will be?

9. Before we begin our critique of Oxfordshire County Council's proposed congestion charge scheme on business, it is worth reminding ourselves that the scheme could have been far worse. As mentioned above, the initial "Connecting Oxford" scheme – a previous iteration of the current congestion charge plan, using mostly the same locations – envisioned an almost complete prohibition on private vehicles on key arterials roads in and around the centre of Oxford, seven days per week, 365 days per year[128]. By comparison, the traffic filter scheme and – by extension, the congestion charge scheme – is notably less business hostile, in that lorries and vans are entirely exempt from the scheme, and cars can be used without a permit for selected business purposes[129]. It is also possible to use both business and private cars in certain circumstances without a permit – about which, more shortly.

10. It is also recognised that, as a city focused on tourism and education, certain elements of Oxford's economy (mainly, its universities) are likely to be shielded from the impact of the congestion charge. For example, tourist buses will continue to be allowed to enter the city centre, depositing visitors for day trips. Likewise, summer school students – who typically live in central Oxford university accommodation – are unlikely to be affected by the imposition of the congestion charge. Here, we note the findings of the 2022 "travel to city centre" survey undertaken by Steer, which found the vast majority of tourists to Oxford arrived by various forms of public transport, and barely 1% of those who visited the city centre for educational purposes used a car.

11. Instead, we believe the businesses most likely to be negatively affected by the congestion charge are those private sector businesses who mainly serve the region's permanent population, who use Oxford as their most convenient cultural, recreational and shopping centre – typically because it is the closest major conurbation to their homes.

12. Do we know that those who live outside of Oxford currently use the city as a regional destination hub? Categorically, yes. In general terms, it has been estimated that visitors from elsewhere in Oxfordshire account for just over half of all visitors to the city[130]. But, to illustrate this point by specific reference to visits to Oxford city by car, we offer two examples below.

13. The first example of where – unambiguously – visitors from outside Oxford use the city's facilities as a regional hub is Botley Road. Since April 2023, Botley Road – a key shopping destination (both retail and wholesale) – has effectively been cut off from the rest of the city. This road closure has caused significant and well-documented[131] harm to (mainly independent) businesses who have been disconnected from their city customer base

[128] Oxford Mail / Alison Hill. Radical Connecting Oxford transport changes will benefit us all. 24 September 2019. Available here
[129] Oxfordshire County Council. Proposed permits for cars. Available here.
[130] Oxford Clarion. Oxford's footfall bucks national trend for 12th month in a row. 8 July 2024. Available here.
[131] Julian Le Vay. Network hell. Oxford Community cut in two. Our community blighted. Available here.

arriving by car. However, one of the most surprising outcomes of this vehicular isolation is that vehicles have continued to access this road in large numbers. In the year prior to the Botley Road closure (2022), the average daily traffic count just outside the Seacourt Park and Ride entrance was 21,800. By 2024, when the road had been closed for the entire year, average traffic volumes were still 16,266[132]. This is a significant percentage fall (roughly 25%), but not a completely catastrophic fall. It is also entirely in line with OCC's target of "reducing one in four car trips by 2030" policy objective, as set out in its central Oxfordshire Travel Plan[133].

14. So why are 16,266 vehicles per day entering this dead-end road? With around 6,500 residents living in the ward in the immediate vicinity of Botley Road[134], not all vehicular traffic can be local – especially as more than half of all ward households do not have access to a car. Instead, the most likely explanation is that residents of the wider county and beyond are travelling to Botley Road's retail parks, light industrial units and conference centre facilities in large numbers – not to mention the area's numerous car hire companies. Moreover, these visitors appear to be still using the Botley Road facilities, notwithstanding their inability to later drive onwards, towards the city centre. Even when closed to vehicles at one end, Botley Road graphically illustrates the role of Oxford as a regional shopping destination.

Illustration 6.2: One of several retail parks on Botley Road

15. Another outer Oxford district that acts as a regional draw is the Summertown shops on Banbury Road in North Oxford. Here, the evidence to support this assertion is a 2021 survey of car park users, undertaken by the Summertown and St Margaret's Neighbourhood Forum[135]. This survey found that many visitors to the neighbourhood's Diamond Place car park were travelling a considerable distance on the days the survey was carried out: an average of 17.3 miles on a weekday, and 24 miles on a Saturday – not distances that lend themselves to modal shift such as cycling and walking. At a more granular level, the survey

[132] Oxfordshire County Council. Annual average daily traffic map. Available here.
[133] Oxfordshire County Council. Central Oxfordshire Travel Plan. Available here.
[134] Office for National Statistics. Ward profile, Osney and St Thomas, 2022. Available here.
[135] Summertown and St Margaret's Neighbourhood Forum / D.F. Bryceson: Report on the SUSTM Transport Working Group's (TWG) Survey of Summertown's Diamond Place Parking on Wednesday 29 September & Saturday 9 October 2021. 11 November 2021. Available here.

found that visitors to the car park tended to visit the neighbour for work (including the building trade) and education purposes during the week, and for recreation and leisure at the weekend.

Illustration 6.3: Diamond Place car parking survey, car parkers' distance of travel, 29 September 2021

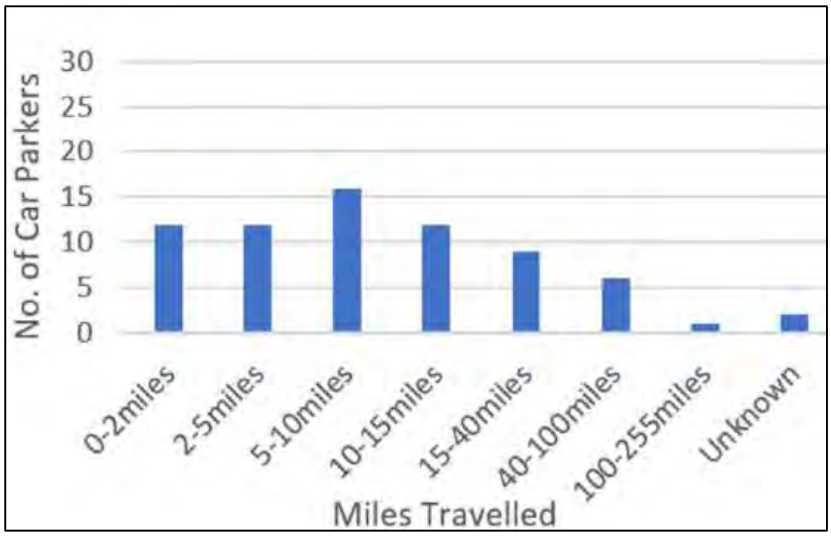
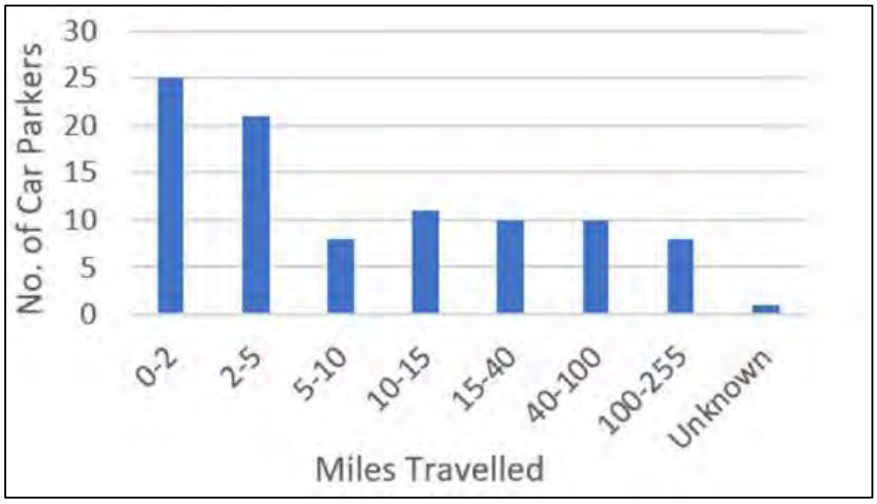


Illustration 6.4: Diamond Place car parking survey, car parkers' distance of travel, 9 October 2021



16. The existence of the Summertown Shops and Diamond Place may be another explanation of why traffic counts and congestion levels tend to be the highest in this area of Oxford, including the immediately adjacent Woodstock Road. As previously mentioned, average daily traffic for Banbury Road immediately north of the Summertown Shops close to the outer ring road averaged 14,407 in 2024 – notably higher than the 12,529 recorded on the same road, closer to the city centre. On adjacent Woodstock Road, which lacks any

significant retail facilities along much of its length, average daily traffic levels on the edge of town were 13,700 in 2023, the latest year for which figures are available – more than 1,300 vehicles daily fewer than the parallel Banbury Road sensor, just a few hundred yards away. By the bottom of Woodstock Road, close to the end of the city centre, the 2023 figures were just 9,300 – some 4,400 fewer cars than crossed the sensor on the edge of the city centre on the same road.

Problem one: making Oxford an unattractive destination – and harder to reach

17. In light of the evidence presented above, we now argue the congestion charge is likely to cause significant disruption to many of Oxford's businesses, as customers switch to other providers, based elsewhere – often outside the city. Later, we argue that even a small decrease in customers as a result of new vehicle restrictions can have a significant detrimental effect on businesses, to the point that some cease trading – even if a significant majority of their customer base are not directly affected by the vehicle restrictions.

18. Starting first with the outer Oxford examples mentioned above. For both Botley Road and the Summertown shops, there will be no further direct limitations placed on these shopping districts as a result of the congestion charge, for visitors arriving from outside the city. Rather, the effects are likely to be indirect – in both cases, predicted increases in ring road traffic between them and their wider Oxfordshire client base, potentially making both locations a less attractive designation to visit.

19. For Summertown, an additional challenge is likely to be the Monday – Saturday peak time ANPR checkpoint restrictions placed on the Marston Ferry Road, thereby hindering direct access from Headington, Northway and Marston. In contrast with Summertown, Marston and Northway has few leisure, retail and hospitality facilities. Summertown therefore acts as an important adjacent local hub for these poorly served neighbourhoods. Separately, Oxfordshire County Council has also floated proposals to remove on-street parking alongside the Summertown shops[136] – potentially making this destination even less attractive to visitors. This prompted an immediate and firm objection from potentially affected businesses, via a formal petition submitted to Oxfordshire County Council.[137]

20. It remains to be seen if Marston and Northway residents switch their leisure and food shopping activities, in particular, from Summertown to Headington, given the fundamentally similar nature of their offering and similar car travel times between them in many cases. Both Summertown and Headington have a medium-sized Sainsburys and a small Tesco, for example, while Summertown has an M&S Food and Headington a Waitrose, Iceland and a (shortly to close) Co-op[138]. In the event that such a switch occurs, it would be ironic if Marston / Northway car journeys are diverted away from Marston Ferry Road (a country road for half its length) and instead use the far more urban Headley Way and London Road, potentially leading to increased congestion and pollution on these roads. As mentioned in

[136] This is Oxford. Oxford: Traders 'horrified' over possible parking removal. 5 March 2025. Available here.
[137] Oxfordshire County Council. County Council meeting, Tuesday 1 April 2025. Available here.
[138] This is Oxfordshire. Headington post office and Co-op Food closure date confirmed. 11 July 2025. Available here.

chapter three, this route is also notable for being the main route into work for staff at the John Radcliffe Hospital.

21. Closer to Oxford city centre, the potential for negative impacts on business of the congestion charge are likely to become more acute for anyone travelling in by car, for both visitors (around 9%) and for those who work in the area (around 25%)[139] and are not eligible for the central permit area (i.e. most people). This is because of the positioning of the congestion charge ANPR checkpoints, which hinder access to the city from the east (via the St Clements and St Cross Road checkpoints), from the south (via the Thames Street checkpoint) and the north (via the Hythe Bridge Street ANPR checkpoint). For these individuals, Oxford risks becoming a less attractive place to visit or work than alternative locations, in wider Oxfordshire and beyond.

22. To illustrate this point, we offer an example of a central Oxford leisure activity more likely than most to accessed by car (16%), according to the Steer report: visiting one of Oxford's theatres for an evening performance. Oxford's theatres are one of the city's main cultural draws: the Oxford Playhouse, for example, put on 624 performances in the financial year 2023 – 2024, selling 141,000 tickets and generating £4.3m in revenue – of which £3.5m is directly attributable to theatre productions and / or bar / catering takings[140]. Even using a very crude assumption that approximately 16% of this theatre's visitors arrive by car, this equates to around 22,560 tickets that are dependent on easy vehicular access, and more than £560,000 in theatre and bar revenues – considerably more than the theatre's year-end surplus (£117,000). We shall discuss how only small variances in turnover can tip a profitable business into a loss shortly. But, to continue with this example: a £560,000 annual reduction in revenue at the Oxford Playhouse would, in one year, wipe out the organisation's entire free reserves (£558,200). And, as if to make matters worse, Oxfordshire County Council plans to introduce the congestion charge during the height of pantomime season – a six-week period that accounts for around a quarter of the theatre's annual ticket sales.

23. To further illustrate the risks to this, and other theatres, in Oxford posed by the congestion charge proposals, we compare average weekend journey times from Witney, a sizable nearby town[141] with no direct train connection to Oxford. During the early evening, the journey time between Witney and central Oxford is typically 28-45 minutes by car, or just over an hour by bus, according to Google Maps. This is somewhat more convenient for Witney residents to instead travel to a theatre in Swindon by car (45 – 60 minutes), and considerably more convenient to travel by public transport (2 hours 19 minutes plus). However, anyone wishing to make the journey from Witney to a theatre in Oxford by car will face a series of challenges if the congestion charge is brought in, which collectively makes the Swindon alternative considerably more attractive – not least because nearby car parking is available in Swindon for just £2.40 after 6pm[142].

[139] Steer, 2022. Based on 2021 census data.
[140] Oxford Playhouse. Trustees' annual report and financial statement for the year ended 31st March 2024. Available here.
[141] Witney Town Council. About.
[142] Swindon Borough Council. Car parks – Whalebridge multi-storey car park. Available here.

24. Drawing on data from the Ricardo report, these potential disadvantages of accessing the theatre include:

- Additional congestion on the A44 in the vicinity of Wolvercote roundabout – the same roundabout used to by Witney residents to access the city by car via the A40.
- Additional traffic on the entire length of the Woodstock Road, including close to the city centre.
- Limitations on the right of visitors to access Oxford's main car parks in closest proximity to the theatre, due to it only being directly accessible via the Hythe Bridge Street congestion charge checkpoint. No permit, no access – and the risk of a significant fine for anyone who inadvertently seeks to travel to the location from outside the county, and is unaware that the scheme is in place.

25. A similar scenario occurs in relation to access from other conurbations surrounding Oxford, such as Wheatley. Geographically, Wheatly is close to Oxford city centre, just over nine miles away. Travelling in by car on an early Saturday evening, the journey takes just under 30 minutes by car, and just under 40 minutes by public transport. However, despite being more than twice the distance by car, the Swan Theatre in High Wycombe has a similar journey time by car (22 – 30 minutes) as Oxford's central Oxford theatres. Car parking in High Wycombe is also far cheaper: £3.20 for up to four hours[143] compared with £15.60 for 3-4 hours of weekend parking at Worcester Street in Oxford144.

26. For Oxford's theatres more generally, the operational timings of the proposed congestion charge city centre ANPR checkpoints (7am to 7pm) is particularly unhelpful – even in comparison with the bus gate on Oxford's High Street, which ceases operation at 6:30pm. The start time of a typical evening theatre performance in Oxford is 7:30pm. As a result, evening theatre visitors without a permit would have barely half an hour to pass through a congestion charge checkpoint, park, and walk to the theatre before the performance begins. This is because two-thirds of the city's main city centre car park capacity[145] – including the previously-mentioned Worcester Street, but also Oxpens and Westgate – are behind congestion charge ANPR barriers, for whom access is not possible without a permit until 7pm. As a result, a pre-theatre meal on, for example, George Street, would be out of the question for many would-be theatre visitors who prefer to travel to central Oxford by car, but would not have access to a congestion charge permit.

27. Indeed, even for residents of greater Oxfordshire, the prospect of either paying £5 to cross this road or using up one their 25 annual permit allocation is a potentially unattractive option, compared with simply visiting another theatre outside Oxford instead. Residents from nearby Berkshire and Buckinghamshire and beyond would, of course, receive no permits at all.

[143] Buckinghamshire Council. Wycombe Swan car park. Available here.
[144] Oxford City Council. Worcester Street car park – car parks in Oxford. Available here.
[145] Andrew Gant: written response to Elizabeth McHale, Meeting of Oxfordshire County Council, 8 July 2025, 10:30am. Response on file with author.

28. Moreover, the nearest park and ride to Oxford's main theatres, Seacourt, is currently on the other side of the currently blocked-off Botley Road. As a result, access to the city centre from Seacourt park and ride is mainly via a bus, followed by a lengthy diversion on foot through the so-called "tunnel of doom"[146]. Current accessibility to Oxford's theatres by car is bad enough: the congestion charge proposal looks set to make it even worse.

29. In a similar fashion, it is predictable that Oxford's ice rink and Westgate shopping centres and will be far less attractive locations for those based outside the city to visit, following the introduction of the congestion charge. Both will (effectively) be within a zone where vehicular access will only be possible with a permit during their main hours of operation – 7am and 7pm. For some specific users of these sites, no transport options other than the car are realistically viable. Here, the standout example is competitive ice hockey at the ice rink; due to its bulk, it is not viable to carry the relevant kit on a bike, and is not permitted to be carried on a bus[147]. At the 14 July 2025 meeting of Oxford City Council, Anna Railton, the cabinet member responsible for leading efforts to decarbonise the ice rink, indicated a fear that the ice rink could fail as a direct result of the congestion charge[148]: a user group survey had found that 97% of visitors to this facility arrived by car.

30. The idea that this part of Oxford will become less attractive to visitors as a direct result of the congestion charge is not just predictable – it has actively been predicted by Oxfordshire County Council's two retained consultancy advisors. Data published by Ricardo, an environmental consultancy, predicts that average daily traffic counts on Thames Street (where the Westgate is located) will fall by 1,464 vehicles per day once the congestion charge is in place – a drop of almost 20%, and the equivalent of more than half a million vehicle movements per year. While this modelling does not – directly – attribute that fall to a drop in visitor numbers to the Westgate Centre or Ice Rink, few other explanations are likely, seeing as this road currently has few other destinations other than for residents' access. A fall of 1,464 vehicles is the equivalent of the entire capacity of both Westgate and Oxpens car parks combined[149]. Moreover, as we discuss elsewhere, the justification for the congestion charge on this road is wafer thin: the road is rarely significantly congested, and certainly most not for the 7am – 7pm timeframe of the proposed congestion charge filter. It is also worth noting that almost no buses routinely use Thames Street. Instead, they use their own semi-private route along St Aldates and Speedwell Street.

31. Meanwhile, the nearby Worcester Street and Hythe Bridge Street, both main access route to the Westgate Centre and ice rink from the north of the city, are predicted to see and even bigger falls in average daily traffic counts, falling by 1,734 vehicles – a drop of 38%, and the equivalent of almost 633,000 vehicles per year. In light of these dramatic falls in vehicle counts, it is almost inconceivable that these falls will not have a significant impact on the Westgate and ice rink and, indeed, on the wider central Oxford economy. Yet again, as we discuss elsewhere, there is precious little justification for a congestion charge on Hythe

[146] Oxford Mail. Network Rail pledge on new Botley Road walkway completion. 23 April 2025. Available here.
[147] BBC News. Ice rink users concerned about congestion charge. 29 July 2025. Available here.
[148] Oxford City Council YouTube channel. Hour 2.16. Available here.
[149] Oxford City Council. City centre car parks. Available here.

Bridge Street, which is almost never congested and – like Thames Street – also carries no buses.

Illustration 6.5: (Adopted from Steer report): How the congestion charge locations surround Oxford city centre's main retail districts

32. Even where vehicles are permitted to access this area due to the Oxfordshire residents' permit scheme, the congestion charge is predicted to make it more expensive to access this part of central Oxford. This is set out in the "modelling and income forecasting report", produced by Oxfordshire County Council's second retained consultancy, Steer. Steer predicts that, on average, 27% of all vehicles will pay the £5 Hythe Bridge Street congestion charge, with 34% paying the Thames Street charge. And, because the permit scheme is deliberately designed only to make one permit charge of £5 per day, we can therefore assume that the 27% and 34% figures of vehicles affected are distinct from each other, rather than attached to the same vehicles. As such, it also reasonable to assume that the Hythe Bridge Street congestion charge filter will yield approximately almost £1.4m a year in revenue (i.e. 27% of 2,832 daily vehicle journeys at £5 per day), while Thames Street will yield around £3.7m in revenue (i.e. 34% of 5,891 daily vehicle journeys at £5 per day). The wider costs of this measure, in terms of reduced business turnover and reduced spending power of those paying is, of course, not captured.

33. Going forward, it is difficult to independently establish how many regular visitors would be willing to pay a £5 daily charge simply to enter these specific roads on a long-term basis, given that the congestion charge will be an additional expense to Oxford's notoriously expensive on-street charging costs. For example, the additional £5 charge would take the cost of parking in Worcester Street car park to close to, or beyond, £20 for a short evening stay. Indeed, on both weekdays and weekends, a 4-6 hour stay at this car park – i.e. the approximate duration of a meal and theatre visit –would cost close to £30 with the £5 congestion charge also bundled in. As previously mentioned, the totality of these car park charges are – in no way – competitive with comparable locations, such as Swindon or High Wycombe. Meanwhile, the cost of simply arriving at the ice rink by car – never mind using it – for a two-hour session between 7am and 7pm would also almost double[150]. This is not an ideal scenario for a facility which already costs around £10 per person[151] to visit, and has seen a notable fall in usage[152] in recent years.

34. Focusing now on the elephant in the room: the Westgate shopping centre. We fear that any damage to the viability of the Westgate caused by a loss of visitor numbers[153] would have significant impacts, not only for the Oxford economy, but also the wellbeing of its residents and their ability to make use of its numerous shops, restaurants, cinema, gym and various other leisure facilities.

35. Public domain figures are hard to come by regarding the precise impact on the Oxford economy of this particular Oxford attraction. However, by pulling together insights from various sources, it is possible to establish that the Westgate has a workforce headcount in the region of 3,600[154] (equivalent to 2,000 full-time jobs[155]) and yields around £35m[156] in direct revenues for its owners. A nine-year-old travel plan for Westgate[157], submitted as part of a planning application, indicates that around 27% of surveyed visitors to the Westgate arrive directly by car during weekdays, either as a driver (17%) or passenger (10%). For staff, the percentages arriving directly by car are slightly lower: 14% as drivers and 9% as passengers – so 23% in total – which is broadly in line with the Steer report, mentioned previously. On Saturday, the percentages of visitors arrive by car increases to 28% – 15% as drivers and 13% as passengers. For staff, percentage arriving decreases on Saturday to 18% in total, split equally between drivers (9%) and passengers (9%). There are no figures in this report for Sunday.

36. We do not know if the percentages quoted in this report reflect contemporary travel arrangements, or the extent to which the congestion charge restrictions will impact those who currently travel to the Westgate by car. However, via a process of crude extrapolation,

[150] Oxford City Council. Oxpens car park – car parks in Oxford. Available here.
[151] Oxford Ice Rink. Visit prices available here.
[152] Oxford City Council. Cabinet, 24 January 2024. Available here.
[153] Oxford Mail. Westgate shoppers 'would ditch' centre over charges. 16 June 2025. Available here.
[154] Oxford City Council. Scrutiny committee, 4 December 2018. Available here.
[155] The Retail Bulletin. Westgate Oxford celebrates positive impact on local economy. 26 October 2018. Available here.
[156] Landsec. Landsec Annual Report 2025. Available here.
[157] Westgate Oxford Alliance / SWECO (2016). Travel Plan - Westgate Oxford Westgate Centre & Adjacent Land. Available here.

we can assume that approximately 20% of workers who arrive by car are potentially affected, in the region of 400 people. For visitors, a ballpark daily visitor impact might be 25%. For workers, a key question will likely be: even with 25 or 100 permits per year, is it worth incurring an additional expense of nearly £680 for a full-time worker (135 days times £5) just to be able to continue to drive to work? For visitors, the key question will be: is it worth paying up to £5 extra for parking (taking the total cost to more than £13 for 3-4 hours during peak times) – or simply go somewhere else cheaper instead?

37. In light of the potential for specific and localised disruptions to Oxford's leisure and entertainment districts, we cannot understand the basis for the assertion made by Steer in its 2022 traffic filter business impact evaluation that this scheme would have a "neutral – no significant benefits or disbenefits" on customer businesses operating in Oxford. At the very least, we offer several distinctive neighbourhoods (central and Summertown) and several specific sectors (retail and theatres) where it is entirely predictable for moderate or large adverse impacts to arise as a direct result of the congestion charge scheme. Yet, as we also note, Oxfordshire County Council appears largely disinterested in examining these potential adverse impacts, ahead of its planned implementation of its congestion charge.

Problem two: Oxfordshire County Council's partial approach to business impact monitoring

38. Oxfordshire County Council's proposed congestion charge scheme has the potential to have a significant, but also highly localised, impact on Oxford's business community. In light of this, it is our strong preference that the council's approach to business impact monitoring should be similarly focused, with a particular emphasis on direct, real-world impact, notably, business turnover and staff headcounts.

39. We believe this is a reasonable request, in light of Oxfordshire County Council's recent history of introducing new vehicular restrictions on specific areas of the city. On several occasions, local businesses have reported an immediate and serious detrimental impact on their operations as a direct result of the council's scheme, concerns the council disregarded – or worse, refuted[158] – and made no efforts to mitigate against.

40. In recent years, resident-led business impact surveys have been conducted in numerous locations where vehicle restrictions have been introduced, including around Walton Street in Jericho (following the closure of Walton Street)[159], on Cowley Road in Oxford (following the introduction of the East Oxford LTNs)[160], on Magdalen Road (also affected by the East Oxford LTNs)[161] and on Botley Road (following its closure)[162]. Yet, despite the clear willingness of

[158] Oxford Mail. Oxfordshire leader criticised for Botley Road stance. 18 April 2025. Available here.
[159] Jericho Connections. Jericho Business survey findings. February 2020. Available here.
[160] This is Oxfordshire. Oxford Cowley Road traders produce shock business survey on LTNs. 9 February 2023. Available here.
[161] Clarke Associates. Top-line findings on study into effects of LTNs – Magdalen Road. March 2024. Available here.
[162] Julian Le Vay. Network hell. Oxford Community cut in two. Our community blighted. Available here.

businesses to take part in such surveys, Oxfordshire County Council – and also Oxford City Council[163] – refuse to countenance any such equivalent city-wide surveys in relation to the congestion charge – we suspect because the results would not be to their liking. Councillors have even refused to consider undertaking highly-targeted business impact assessments on sectors of the Oxford economy where impact would be very easy to measure, such as the previously mentioned theatres[164], plus the ice rink or Westgate Centre.

41. Instead, Oxfordshire County Council insists on focusing mainly on two metrics that we regard as sub-optimal: footfall data (i.e. mobile phone data), provided by Huq, together with spend data, provided by Mastercard. We regard these data sources as sub-optimal because it has the effect of distancing the policy from its direct, real-world, impact on individual businesses.

42. We regard footfall data, in particular, as being potentially problematic as a measure of impact of the congestion charge on business, given Oxford's specific demographics. The city is a university city for much of the year, and a tourist destination for the rest of, especially during the summer period: the city attracts around 7 million visitors per year[165], according to Oxford City Council. However, neither of these groups are likely to be significantly affected by the congestion charge, because – as per the Steer survey –many visitors neither arrive by the city by car, or do not use a car during their time in Oxford. Anyone familiar with either the St Giles coach stop or the Hythe Bridge Street route to Oxford's main train station will be familiar with throngs of tourists arriving at the city, taking a trip to a university college or two – and then leaving.

Illustration 6:5: Tourist buses in St Giles

[163] Oxford City Council. Minutes of meeting of council on Monday 24 March 2025. Available here.
[164] Judy Robert, Cabinet Member for infrastructure and development strategy in response to question from Lizzie McHale, Oxfordshire County Council full council meeting, 9 July 2024. Response on file with author.
[165] https://www.oxford.gov.uk/statistics-oxford/economic-statistics

43. Of course, we would not deny that short-visitors to the city – including day tripper (who are likely to make up a significant percentage of the city's visitors[166]) are likely to generate significant economic activity in their own right, especially when visiting cafes, pubs and restaurants, or arts / cultural and entertainment experiences[167]. However, our key concern is that visitors to Oxford – while potentially generating a large volume of footfall data – are more likely to use facilities that long-term residents tend not to (i.e. museums, gardens, libraries[168] and colleges). As a result, we fear the "noise" of the movement of students and tourists will mask the highly specific detriments inflicted on businesses mainly used by those whom the city is their home, their place of work, or the nearest available conurbation. Worse, while central tourist attractions such as museums also benefit from diverse income streams – including university funding [169] – most independent businesses in Oxford do not have this luxury: they live, or die, on visitors, income, and profitability, alone.

Illustration 6.7: summertime in Oxford – daytrips to city centre's colleges and parks

[166] Experience Oxfordshire. Visitor survey 2025. Available here.
[167] Experience Oxfordshire. Visitor survey. Summary of findings 2025. July 2025. Available here.
[168] University of Oxford / Gardens Libraries and Museums. Oxford University attractions welcomed over 3.5 million visitors in 2024. 21 March 2025. Available here.
[169] Ashmolean Museum Oxford. Annual Review 2023 – 2024. Available here.

44. Further, as we note elsewhere, in outer Oxford, a significant percentage of visitors to the area are staff and patients at the city's hospitals, including 1.7 million inpatients and 3,500 staff – most of whom drive to work[170]. This is likely to help maintain Oxford-wide footfall data, albeit mainly contained within hospital premises. In a similar fashion, Oxford's 3,500-strong[171] workforce at the BMW Mini factory in Cowley are more likely to be affected by global economic trends than Oxford's congestion charge – unless increased traffic on the ring road alongside the factory causes problems for the plant's just-in-time approach to manufacturing, affecting its ability to function.

45. To have any credibility as an economic indicator, we therefore request footfall data is used to assess business impact of the congestion charge in as granular way as possible. We understand from Huq that postcode-level analysis is available, and we request that it is used extensively by Oxfordshire County Council. Most obviously, if the scheme goes ahead, we request that break-out analyses must be collected and published in as close to real-time fashion as possible, for each of Oxford's distinctive outer Oxford business districts (Summertown, Marston, Headington, Cowley, Cowley Road, Oxford retail park, Botley Road). We feel this is an entirely reasonable request, on the basis that the Steer report mentioned in illustration 6.1 above clearly indicates that different parts of Oxford are typically accessed via distinctive modes of transport – in this case, access to work. It is therefore predictable that different business districts are affected differently.

46. In addition, we ask that specific focus is placed on the parts of central Oxford that are mostly likely to be used by the county's permanent residents i.e. Westgate / Queen street (for retail shopping), George Street / Worcester Street (the city's main cultural and theatre district), and the High Street / covered market area (a cross-over point between residents' facilities and tourist facilities). Distinctive business districts, such as St Clements and Hollow Way (both planned congestion charge sites) should also be assessed, as should Walton Street in Jericho. We categorically do not wish for the whole of Oxford city centre to be treated as a single footfall unit of measurement. If this approach is taken, it poses a serious risk that student (and, in particular) tourist footfall will mask the real-world impact of Oxford / Oxfordshire residents deciding – or not deciding – to visit their own city centre by car, as a direct result of the congestion charge's introduction.

47. In relation to spend data, we note that Oxfordshire County Council's data provider, Huq, bundles in Mastercard as part of its offering. Again, we request that postcode level data is used to evaluate spend, in as granular manner as possible. Below we offer some top-level postcode suggestions: if yet more granular data is available, focusing even more closely on distinctive business districts, we request it is used. As before, our strong preference is that such spend data is published online in as close to real-time as possible.

[170] Oxford University Hospitals NHS Foundation Trust. Healthy Travel Strategy: 2025 – 2027, A framework for travel strategy for the John Radcliffe. Acting CEO's forward. Available here.
[171] Oxford Mail. BMW explains why 180 workers lose jobs at Oxford Mini plant. 7 May 2025. Available here.

Table 6.2: Requested outer Oxford footfall / spend monitoring locations

Location	Postcode
Summertown shops	OX2 7
Marston shops	OX3 0
Headington Shops	OX3 9
Cowley centre shops	OX4 3
Hollow Way / Oxford Business Park South	OX4 2
Oxford retail park	OX4 6
Cowley Road / St Clements	OX4 1
Botley Road retail parks	OX2 0
Walton Street	OX2 6

Table 6.3: Requested inner Oxford footfall / spend monitoring locations

Location	Postcode
Westgate	OX1 1
Theatre district (including George Street)	OX1 2
High Street / Covered Market	OX1 4

48. Finally, we request that – if the scheme does go ahead – it will immediately be suspended, in full or in part, if there is evidence of a significant deterioration in spend in any given location. To give effect to this "emergency brake", we ask that Oxfordshire County Council create a dedicated reporting tool for business, where business leaders can directly communicate evidence of economic harm to council officers, in the expectation that their reporting will be swiftly acted upon. This would be in addition to the Mastercard spend approach to business impact monitoring. Although we make this suggestion mainly with Oxford's SME business community in mind, we also recommend that this reporting scheme should be open to all employers and key business stakeholders, including Oxford's Westgate centre, the city's theatres, its hospitals, schools, colleges – even the BMW car factory.

Problem three: the bureaucracy and complexity of Oxford's planned congestion charge scheme – implemented in a hurry

49. Unlike a predecessor iteration of the policy (i.e. Connecting Oxford), the proposed congestion charge scheme is not applicable to vans and lorries. Anyone who drives these classes of vehicles will not be affected by the congestion charge scheme – there will be no need for them to register for a permit.

50. Where matters become noticeably more complicated is in relation to cars: firstly, the point at which cars stop being cars, and start being vans – which can catch the unwary. And secondly, the various permits that are proposed to be available to car drivers.

We fear the permit system, described below by particular reference to business permits, poses a significant problem for businesses, for three main reasons:

- The scheme's inherently bureaucratic nature, potentially affecting many people;
- The likelihood that key aspects of the scheme will be unenforceable;
- The speed with which the scheme is proposed to be rolled out.

51. Addressing the first point first: as table 6.4 below makes clear, numerous businesses, both public and private sectors, will need to proactively register their cars before the scheme goes live, or risk a fine. While we can probably assume that certain – highly regulated classes – of car drivers will be made aware of the need to register their vehicle through official channels, the scheme will also be applicable to many other classes of vehicle driver, such as community healthcare workers, or anyone who drives a vehicle into Oxford work. Here, the route for communicating the existence of the scheme to those affected is far less obvious. To date, Oxfordshire County Council's communication efforts regarding its proposals have been less than optimal, and appear to focus almost exclusively on digital communications, rather than sending out letters and other printed materials.

52. Car users will also need to ensure their vehicles are appropriately registered with the DVLA at eligible Oxford / Oxfordshire locations, in a manner that complies with the council's eligibility expectations. For example, a multi-site business whose business vehicles are currently registered at an address outside Oxford would not be eligible for any congestion charge permits under the council's proposals, even if the car was mainly used within the city. Here, an obvious problem use case would be estate agents: highly mobile, not obviously carrying "goods", "tools or equipment", and heavily concentrated in locations immediately adjacent to proposed congestion charge locations, namely Summertown (Marston Ferry Road) and St Clements.

53. Likewise, those who work in Oxford's informal economy – child minders, cleaners, dog walkers etc – and occasionally use their private car for business purposes would need to regularise their position with their insurer to be eligible for "personal car used as a goods vehicle" permit. While we do not condone the inappropriate insurance of private vehicles, we recognise that it is currently likely to occur, and that those affected need to be informed.

54. Our second concern relates to enforceability. As table 6.4 makes clear, specific permits are intended to be used in one situation – i.e. driving for work, but not in others – i.e. driving to work. This is because the scheme is specifically intended to dissuade commuting by car[172] – notwithstanding that most workers in Oxford city centre do not anyway, according to 2011 census data. The council's proposal makes no attempt to explain how this system will be enforced. In all likelihood, it cannot be, except by employees and employers themselves. In relation to the traffic filters scheme, officers from Oxfordshire County Council have repeatedly signalled that they are open to altering the parameters of the permit scheme – notably the hours of operation on Marston Ferry Road and Hollow Way. We can quite

[172] Oxfordshire County Council. Details about permits for cars. Available here.

envision a scenario where the council rapidly tightens up eligibility for the use of cars, in light of what appears to be a significant gap in the policy's enforceability.

Table 6.4: The congestion charge permit scheme – key criteria and likely workability/enforceability

Permit type	Key criteria	Workable / enforceable?
Emergency or health service car	The car must be registered to the qualifying provider	Yes
Hackney carriage or private hire vehicle	The car must be registered to either the driver or the operator.	Yes
Hearse or funeral car	Hearse means a car with special equipment for the transport of deceased people registered to and operated by a funeral care business.	Yes
Car club car	Operator of a car club with CoMoUK accreditation.	Yes
Approved driving instructor	The car must be registered at the home address of the applicant, or to a driving school. For travelling to students and during lessons or tests only.	Partially – not when no lessons are taking place.
Community health or care worker	Eligibility confirmation must be provided by employer, a registered health or social car provider. Permit cannot be used for commuting on days when no operational journeys are expected to be made.	Partially – yes, eligibility; no. Usage on non-commuting days.
Business car used as goods vehicle	Car must be registered to the business and used only for collecting, delivering or carrying goods or for carrying tools or equipment – no commuting.	Partially -yes, eligibility; no. Usage on non-commuting days
Personal car used as goods vehicle	Car must be registered to the business and used only for collecting, delivering or carrying goods or for carrying tools or equipment – no commuting.	Partially -yes, eligibility; no. Usage on non-commuting days.

55. Our final observation relates to what we believe to be the undue haste with which this scheme is proposed to be introduced. Here, we have two specific criticisms of the proposals, in terms of their potential harm to business.

56. Firstly, the scheme is scheduled to be introduced in the immediate run-up to Christmas, a vital trading period for many of Oxford's businesses. Business owners have repeatedly asked those responsible that, even if the scheme is implemented, implementation should be deferred until after Christmas, on the basis that this would help maximise businesses' resilience in the event of a sharp drop in visitors to the city. However, notwithstanding the precedence for doing so – namely the deferred introduction of the zero emission zone pilot

area[173] – Oxfordshire County Council leaders appear reluctant to accede to that perfectly reasonable request.

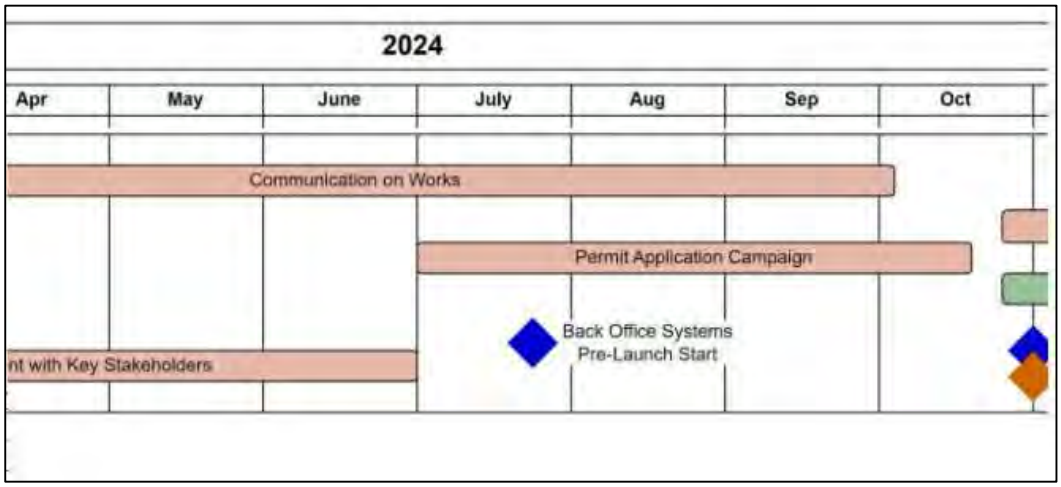
57. Prior to the scheduled introduction of the related traffic filters scheme, Councillor Andrew Gant, cabinet member for transport management said, in a written response to High Street shop owner Emily Scaysbrook: "It is important that the Council understand the impact of the filters throughout the year including the pre-Christmas period and if the scheme needs to be adapted. This will be closely monitored and evaluated."[174] More recently, when challenged to defer the congestion charge scheme, Councillor Gant has described the comparison with the handling of the ZEZ expansion with the congestion charge introduction as a "false comparison", adding that: "if the temporary congestion charging scheme is approved by the council's Cabinet following consultation, we will introduce it as soon as possible." [175]

58. Building on this point, we have secondly established, via Environmental Information Regulations request 23128[176], that Oxfordshire County Council previously regarded a 3.5-month permit application campaign as optimal to raise awareness of the implementation of the traffic filters scheme. Given that the two schemes are practically identical, it does not seem rational for Oxfordshire County Council to expedite the delivery of the congestion charge, seemingly mainly for the economic convenience of Oxford's bus companies.

59. Above, we outline how entire classes of businesses will not only need to be informed of the existence of the congestion charge scheme, if implemented, but also jump through all bureaucratic hoops necessary to be eligible for a permit and then successfully apply for one. Given that the congestion charge decision will not even be taken until September 2025, the implausibility of a "successful" pre-Christmas launch appears obvious to anyone other than Oxfordshire County Council.

[173] BBC News. Oxford Zero Emission Zone: Timeline set for start of pilot. 9 September 2021. Available here.
[174] Oxfordshire County Council. Full council meeting, 9 July 2024. Correspondence on file with author
[175] Oxfordshire County Council. Full council meeting, 8 July 2025. Correspondence on file with author.
[176] Oxfordshire County Council. Project plan on file with the author.

Illustration 6.8: Extract of the proposed traffic filters project plan



Conclusions

60. Above, we show the potential gaps in Oxfordshire County Council's understanding of the potential – and highly localised – impact of its congestion charge proposals. Unambiguously, limiting vehicular access to Oxford has previously – and likely will – cause significant harm to specific types of businesses, especially those who depend on customers from the wider Oxfordshire area. As we indicated above, there is a significant risk that well-used local facilities will fail, because even a small drop in visitor numbers will render them non-viable.

61. Despite this, Oxfordshire County Council seems intent on pressing ahead with the scheme, seeking to deliver it at the singularly most damaging time of the year for many businesses – the pre-Christmas trading period. We regard the speed with which the scheme is planned to be introduced deeply troubling, in light of the significant additional bureaucracy it will demand of business, seemingly at very short official notice.

62. We regard its proposed monitoring regime as sub-optimal, to say the least. To mitigate against potential shortcomings, we recommend monitoring footfall and spend data in as granular detail as possible, and not treating Oxford – especially Oxford city centre – as a single economic unit. It is not.

63. We continue to advocate for the surveying of individual businesses, focusing on turnover and headcount data, on the basis that it has repeatedly been demonstrated to be viable. But, in the absence of this, we call for a dedicated – and credible – reporting tool for businesses, where adverse impacts can be reported to the council, and promptly acted upon. If significant economic harm is occurring in the Oxford economy as a direct result of the congestion charge being introduced, the scheme should be immediately suspended, in whole or in part. The convenience of the city's bus companies should not be paramount, taking precedence over Oxford's wider economy.

Conclusions

1. We believe the council's congestion charge proposal is a path-dependent, sunk-cost fallacy embracing, disproportionate reaction to a highly localised problem caused by a specific situation – namely, the temporary closure of Botley Road, which is adding congestion to Abingdon Road. We firmly believe the scheme should not go ahead.

2. In response to this highly localised problem, Oxfordshire County Council is now attempting to implement a citywide congestion charge, based on a wholly inappropriate pre-existing scheme, which it has repeatedly tried to introduce for more than a decade – mainly because it already has the technology in place to allow it to do so.

3. It does not appear to matter to the council that its proposed scheme is likely to harm parts of Oxford, and far beyond, which would otherwise be unaffected by the Botley Road closure. Adverse impacts are predictable across specific areas of Oxford's economy, including its theatres and shops and – most importantly – its hospitals, which are regional hubs for healthcare provision. In light of this, we do not merely regard Oxfordshire County Council's proposals to be disproportionate; we believe they have tipped over to the point of irrationality.

4. To summarise, for one final time: the proposed congestion charge would be introduced on several of Oxford's key arterial roads that are not noticeably busy with traffic, and have become less busy since the pandemic. Furthermore, a minority of these roads suffer from any notable congestion, and certainly not for all of the time for which the congestion charge would be operational. Many other comparable roads in Oxford and Oxfordshire carry noticeably more traffic than the proposed congestion charge locations, and yet these locations will not have a congestion charge imposed upon them.

5. Bizarrely, two out of the six roads the council regards as being suitable for a congestion charge to improve bus services (Hythe Bridge Street and Thames Street) currently carry no buses at all. Two more (Marston Ferry Road and St Cross Road) carry few buses, which are not hindered by any significant congestion. Just two of the six planned congestion charge roads (St Clements and Hollow Way) are both bus routes and also suffer from modest congestion – the worst (on St Clements) averaging around 6 minutes at peak time, along this short stretch of road. Yet, despite this, four of the six congestion charge locations are proposed to operate 12 hours a day, seven days per week, 365 days a year.

6. As if to double down on the irrationality of its proposed scheme, Oxfordshire County Council has no plans to introduce congestion charge restrictions on major bus routes that do suffer from congestion, notably Headington. Nor does it plan to introduce a congestion charge on Iffley Road, a bus route that suffers from a significant amount of congestion during the private school term time, and had recently had a congestion-inducing, bus timetable shredding, LTN scheme imposed on it, which the council refuses to remove.

7. Meanwhile, the council is currently seeking to mitigate the bus-harming impacts of its own congestion charge plans by relocating a bus lane in North Oxford. Its congestion charge proposal is also likely to disrupt other bus routes in outer Oxford, notably on Marsh Lane and Garsington Road, if modelling released as part of the traffic filters consultation is to be believed.

8. In light of what we believe is the council's irrational approach to congestion reduction in Oxford, this report has sought to identify the actual sources of traffic congestion in the city, and propose evidence-based alternative solutions that attempt to resolve them. Significantly, our research indicates the council's entire rationale for the scheme is wrong, and based on the incorrect belief that traffic and congestion in Oxford is mainly caused by residents circulating by car in their own city. This explains the original rationale for the decade-old Connecting Oxford plan, and the specific congestion charge ANPR checkpoints now proposed. In light of what we have discovered, we advocate not only scrapping the congestion charge scheme but also its successor, the traffic filters scheme.

9. Drawing on evidence from various sources, including the council's own, we instead believe that much of Oxford's congestion is caused by those outside the city – including its very large hospital workforce – making point-to-point journeys by car to the city's outer edge, and not travelling onwards toward the city centre. This is why traffic and congestion occurs all year round at key entry points to the city, such as London Road in Headington and Marsh Lane in Marston – even Botley Road, which is currently closed at one end, but still functions as a major regional retail destination at its outer edge. Yet, despite the demonstrable outer Oxford focus of Oxford's congestion, Oxfordshire County Council's congestion charge scheme mainly focuses on reducing city centre traffic and congestion (of which there is very little) while also displacing yet more traffic to the city's outer edges.

10. We appreciate that there are exceptions to this general rule – notably visitors to the Westgate centre in central Oxford, we appear to use the centre's large car park to enjoy the city's evening economy, and not just to its retail offering. But, even here, congestion in this area is highly localised. Westgate's impact on bus services in the area is also limited, because of various bus gates already in place which allows buses to bypass most traffic that builds on Thames Street. Only rarely is this bus bypass system breached by traffic.

11. Seeking to produce evidence-based alternative proposals, we build on potentially viable solutions already identified, including by the NHS hospital trust which runs Oxford's leading hospitals. To that end, we advocate significant enhancements to Oxford's park and ride provision, principally for the benefit of its hospitals, staff and patient-visitors.

12. We also advocate opening up Oxford's park and rides to the city's private schools, to allow them to become edge-of-city pick-up and drop-off points. This builds on evidence, also provided in this report, that Oxford's private schools are likely to be a major source of traffic and congestion in Oxford, notably on Iffley Road.

13. By deploying point-to-point park and ride bus services, which have comparable journey times to private cars, we believe a solution to Oxford's traffic and congestion problems can be delivered, almost entirely based on quality of life-enhancing carrots, not punitive sticks.