

## Policy & Programmes

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Dear Central Oxfordshire Travel Plan Team,

Thank you for inviting responses on the Central Oxfordshire Travel Plan (COTP) Consultation Draft document. We have provided a separate response for the Traffic Filters which has a detailed separate consultation.

The Area Travel Plan comprises 22 Actions, which include 3 key transport proposals: traffic filters, a workplace parking levy and zero emission zone. The actions seek to improve bus reliability, deliver a comprehensive walking and cycling network, reduce congestion, improve air quality and provide 20-minute neighbourhoods.

Noting that the geographies of the COTP fall within South Oxfordshire District, and the numerous district residents who travel to and from Oxford, we would like to highlight our deepest disappointment with the degree of liaison with us in advance of this draft document, given the content directly affects our district.

Our Council recognises and supports the ambition in the Local Transport and Connectivity Plan (approved July 2022) to deliver a net-zero transport system that enables Oxfordshire to thrive, protects the environment and makes the county a better place to live for all residents. However, we are concerned that the proposals in this COTP are Oxford-centric and have not been designed with residents of the surrounding districts in mind.

We are concerned the three major proposals in the COTP, which are traffic filters, a workplace parking levy and a zero-emission zone, could all make it harder for South Oxfordshire residents to work in Oxford, attend hospital visits, or take up the opportunities that Oxford offers for shopping, culture and social trips. South Oxfordshire is a largely rural district, and Oxford serves as the higher order service centre for Oxfordshire. For many years the planning strategy has been to limit housing in Oxford and develop housing in surrounding towns like Didcot, Bicester and Witney. For our residents who commute into Oxford, there is a strong likelihood that the proposed COTP measures will make journeys more complicated, slower and more

expensive. This will include for example key workers needing to get to work, often at anti-social hours. The proposals allow Oxford residents to apply for permits for 100 days a year to drive through the bus gates, which is favouring those who have the privilege of living in Oxford, and have most opportunity to use the enhanced bus services and active travel opportunities for their shorter journeys. Those who work in Oxford, but cannot afford Oxford house prices and rents, are not eligible for the permits and already spend many hours every week travelling to work. They are likely to be the most affected by the measures.

In line with Oxfordshire's Strategic Vision, we would like to see a system which achieves our shared climate change objectives without disadvantaging our residents, in the spirit of our shared vision for a more equal, inclusive and fair Oxfordshire, with discrimination removed. For comparison, the transports measures in the Greater Cambridge Partnership City Access Plan involve offers flat bus fares (£1 in the city and £2 in the travel to work area), more frequent bus services with longer operating hours, Demand Responsive Transport and a huge increase in coverage for rural areas. Can Oxfordshire provide ambitious and positive measure like this which link out properly to the rural districts, and are focussed on journey improvements rather than journey barriers?

We offer some more detailed points on the proposals below.

#### *Actions*

On page 12 the document states that "*Pedestrians are too often squeezed into narrow, cluttered pavements*" there is no clear Action within this Area Travel Plan which seeks to address removal of street furniture that clutters pavements.

#### *Policy Weighting*

The document states the following on page 21: "*An increase in parking provision will in general not be supported. For existing public parking provision across central Oxfordshire, we will support a case-by-case review of provision. In some instances, it may be that there is a negligible congestion or emissions impact related to a particular public parking site. In other instances, there may be significant congestion and/or emissions related challenges for a particular site. In some cases, we may support an alternative land use for a particular site.*" Forming part of the LTCP, this Area Travel Plan does not have policy weighting in order to stipulate land uses. We suggest removal or re-wording of this statement to align with policy hierarchy.

#### *Road Classification*

The A4074 is included in the list of corridor strategies, on page 4 of the document, alongside the A420 and A40 which both form part of the Major Road Network (MRN). However the A4074 is not attributed to this network and thus should not be treated as a comparably strategic road.

### *Public Parking*

The document states on Page 20 that “A significant proportion of public parking is off-street parking provision, which is typically owned and managed by other local authorities or public/private bodies.” It could usefully explain which are the main organisations that own and manage the car parks in Oxford City, to help understand the likelihood of land use change involving these car parks e.g. likely longevity as car parks and scope for re-development to other uses.

#### *On-street parking*

The document states on page 22 “On those routes identified as either being on active travel Primary Routes (Quickways) or on a core bus route (see ‘Proposed central Oxfordshire active travel network’ and ‘Proposed central Oxfordshire public transport and transport hub network’ figures) across the area, the council will review and remove on-street parking provision where it compromises the functioning of these streets.” Has OCC considered whether, as well as Quickways, Quietways are also suitable for the targeted removal of on-street parking provision to increase available space for cycling.

Additionally, where this statement says removal of on-street parking will be undertaken “where it compromises the functioning” it would be helpful to clarify what the function is that we are looking to improve. This statement could be read as for the purpose of what was intended: walking and cycling, but could also be read with the purpose of improving the flow of motorised traffic for car driving and HGVs.

### *Workplace Parking Levy*

Action 3 states that a workplace parking levy will be introduced for business with 11 or more parking spaces within Oxford City Council’s administrative area. We are concerned the levy could be passed on by the employers to lower paid workers who are residents of South Oxfordshire. For example key workers like nurses and teachers who work in Oxford, but cannot afford to live in Oxford, and already have long and expensive commutes at anti-social hours to workplaces such as the hospitals. The levy should target those who live nearby in Oxford and not disadvantage those who have more challenging journeys and high travel costs already.

### *Bicycles and E-Bikes*

Page 25 considers provision for cycling, where design considerations are highlighted to support cargo and adapted cycles. It would be prudent to include infrastructure design for e-bikes into this section to ensure sufficiently secure and electric charging capable facilities are provided to support their use.

An illustration of Quietways and Quickways is provided on Page 26, but Connector Routes are not shown. For clarity in understanding where these routes may be and what function they may fulfil it would be beneficial to add these to the illustration.

On page 27 the document states that signage functions as “*legitimising the use of the road by people cycling, both to people cycling and private vehicle users*”. This could go further to state this to be the case for all road users, including pedestrians (where shared spaces are used).

We agree that “*Provision of wayfinding signage is currently inconsistent across central Oxfordshire.*” Could provision of standardised and recognisable cycle signage be developed for Oxfordshire as part of the LTCP work?

### *Micro-mobility*

Action 11 considers the provision of e-scooters, however Oxford is only permitted to allow e-scooters to operate on roads and in bicycle lanes as part of a national government trial scheme. The conclusion of this scheme is targeted for the end of October 2022. Thus, subject to the conclusions of the study, it may be inappropriate for this micro-mobility mode to be promoted by the Council. This limitation is highlighted in Action 21, but not in Action 11.

### *Buses*

The document sets out details of bus services serving the Travel Plan area on page 30, stating: “*exceptionally high levels of demand and frequency*”. When compared to other areas within Oxfordshire perhaps this statement is moderately accurate, however there are clearly better examples of ‘exceptional’ demand and frequency in locations like central London. To ensure expectations for buses are pitched at the right level, we consider the description should be altered to ‘good’. Similarly we would encourage the following statement to be removed “*Their levels of service are arguably not matched anywhere else in the UK*”.

On page 31 the document lists core bus network features which state: “*strict kerbside controls*”. It would be helpful to set out what is meant by strict controls i.e. does this intend to suggest the strict enforcement of double yellow lines which are designed to prevent on-street parking and thus prevent obstructions to traffic flow?

Noting that buses for the remainder of Oxfordshire will continue to be non-electric, we consider it to be unsuitable to criticize buses by identifying a localised high value emission statement for buses (70% of emissions on St Clements Street, page 33), when they will continue to operate across the wider area for the foreseeable future. This may lead to further negative associations toward bus operation in Oxfordshire. The principle that buses are prevented from moving on congested roads in Oxford is sufficient to highlight the issue, figures stating the duration of delay could be a better metric and overall message.

As set out on page 33, is role out of hydrogen or other fuel buses a realistic prospect for the inter-urban fleet by 2030? If not, we would suggest this be removed from this document.

## *Rail*

Rail improvements set out on page 35 for Oxford Railway Station are stated to include “*widening of A420 Botley Road under railway bridge*” for walking and cycling. Although this measure is positive for the active travel agenda, it is not clear how this measure links to rail improvements. This relates more to rail interchange with other modes, it would be helpful to set out what rail and station enhancements are sought to be provided at Oxford Station.

Also on page 35 is a repetition of the anticipated delivery for Cowley Branch Line services.

## *Transport Hubs*

In describing the transport hub topic on page 35 it is stated that users types can be “*attract or benefit*” variants. It would be helpful to understand what these are or to use non jargon language to explain different anticipated user profiles.

The supporting image for transport hubs on page 36, particularly the left one, does not inspire a positive understanding or attitude toward the notion of a transport hub. All that is shown is a few cycle stands next to a post, with no further welfare facilities or benefits to the user or interchange capability. We are surprised to see this as a prime example of what we may expect transport hubs to look like. If we want to encourage people to use transport hubs the County should focus these on locations that can provide real transport interchange and some welfare benefits to the users. These places must be designed to be safe and secure for all users.

## *Taxis and Private Hire*

On page 36 the document sets out that: “*we will work with taxi and private hire operators to encourage an investment in electric vehicles for their fleets*” without stating how support will be given. If there is no intended funding or deliverable measures to support these modes we would suggest removing this statement.

## *Trip Purpose Data*

In setting out the Vision Zero approach, on page 39, it is highlighted that people travelling on foot are “*17% more likely to be killed or seriously injured on minor roads for every mile a vehicle travels than on major roads*”. This is clearly a discouraging figure and could be read without clear understanding that this figure relates to a comparison between major and minor roads. We would suggest removing this statement from the document and instead highlighting that the Councils currently, and will continue to, review road safety in response to traffic incidences.

## *Funding*

The document sets out that: “*We will work to identify funding sources to enable delivery of the LTCP*”. It should be added that this funding will enable the delivery of the actions set out in this Area Travel Plan, as part of and alongside the wider LTCP deliverables.

### *Working in Partnership*

The document states on page 53 that “*We recognise that we cannot deliver this strategy...*” it is not clear what is meant by ‘this strategy’. Does it refer to the Area Travel Plan Actions set out in this document or the wide range of LTCP deliverables?

### *Nomenclature*

The shift in naming of the Area Strategies to Area Travel Plans needs to be explained and clarified for the reader at the beginning of all the Area Travel Plan documents. To a professional Transport Planner the term “Travel Plan” refers to a number of particular travel related measures required for a specific building, or collection of buildings, as part of the terms of the planning permission. For example, this could be a requirement for 15% of employees to travel to work via bicycle, or for all deliveries to be consolidated via a specified consolidation centre which is agreed with the developer. The Travel Plan document, or Framework Travel Plan document, will be submitted to the Council by the developer, or agent, alongside the Transport Statement or Transport Assessment, which also have predetermined expectations, meanings and associations.

Use of the Travel Plan term in this new context will need clarification to prevent misunderstanding.

### *Priorities*

Listed as one of the 9 priorities on page 7 is the desire to “*Tackle inequalities in Oxfordshire*”. It is important to consider this when seeking to set Oxford-centric travel restrictions such as the Traffic Filters. At present the traffic filters penalise those who do not live inside, or close to the ring road. Those who are not penalised are residents with the best access to employment, and ample active travel and public transport facilities enabling convenient access to all the day to day services they may need.

### *Legibility*

The illustration for the Local Transport and Connectivity Plan (LTCP) on page 4 should be amended to in order to highlight that the County Wide Plans, Area Plans and Corridor Plans form part of Part 2 of the LTCP. The illustration at present could infer that these packages of work form part of Part 1, even perhaps that these documents already exist. As highlighted at the beginning of this letter, we consider more detail is required to explain the LTCP proposals for the wider South Oxfordshire area alongside the COTP document.

The font used in the image on page 7 is difficult to read and we recommend this be changed to a standard font.

Text stating “Action 9” on page 12 should be emboldened.

Action 10 has two variations on page 12/13, with an error also found for the alphabetical listing, please amend for consistency:

- "Action 10 – To help meet Vision Zero, deliver junction improvements to support active travel users where there is:
  - a) a poor safety record for those who are walking or cycling
  - b) significant severance for those walking and cycling"
- "Action 10 - Deliver junction improvements to support active travel users where there is:
  - a) insufficient dedicated infrastructure for those walking or cycling
  - b) a poor safety record for those who are walking or cycling
  - b) significant severance for those walking and cycling"

Supporting information for Action 3 and 4 are both included on page 20. This could be distributed below each of the action text boxes to improve flow and legibility.

The document states on page 21 *"An attractive public parking offer, embedded as part of a network of transport hubs across the area and combined with effective sustainable travel links, represents an important component for reducing parking demand, particularly in the city centre."* This point is not well clarified and doesn't provide the reader with better understanding of what is intended by "an attractive public parking offer" or how it will reduce parking demand in the city centre.

The document states on page 24 that Oxford has a high rate of walking, but the *"strong and growing active travel base in the area is in spite of conditions, provision and routes that often have very poor outcomes for users."* It is not clear what is meant by "very poor outcomes", do people get lost? Hurt themselves? Perhaps a better way of phrasing this would be "routes often provide a poor walking experience".

Also on page 24 is a sentence needing amendment to "cycle": *"Most of the city's adult population - around 60% - do not cycling at all."*

Consider rephrasing *"Altering driver behaviour to recognise people cycling's use of roads"* on page 27 to *"Providing opportunities for motorised vehicle users to recognise the use of roads for cycling"*

Please re-phrase and or explain what is meant by *"localised junctions"* as stated on page 28.

The document states on page 29 *"The public transport network across central Oxfordshire combines high frequency interurban bus corridors, with local rail connections on main lines."* Which sounds like a strategic bus network connects to a local rail network, perhaps this could be rephrased to *"local and strategic rail connections on main lines"*.

Also on page 29, text refers to the bus and rail network illustration, stating *“The wider network shows how enhanced and attractive inter-urban bus routes will continue to play a vital part of the public transport network, by connecting both existing areas and those where development is planned.”* However the illustration does not highlight where development is planned, thus this statement is not correct. Additionally, the purple line does not clearly attach to any location shown on the plan, please review map layout to prevent overlapping of lines to show where the Heathrow and Gatwick *“Airport Link Router”* line connects.

Please add *“have”* to the following statement on page 36: *“Traditionally, they been very successful at reducing congestion and supporting a shift to sustainable travel modes”*.

It is not clear to the reader what the score or index improvements related to Healthy Place Shaping are, as set out in the Key Performance Indicators table on page 52. Similarly *“KSI”* has not been defined in the document. KSI is also not included in the Glossary section.

Please keep us informed of any further consultation documents and please do not hesitate to contact us if you wish to discuss any matters relevant to our Council.

Yours faithfully,



Senior Transport Planner  
South Oxfordshire District Council