

Policy & Programmes

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Dear Traffic Filters Team,

Thank you for inviting responses on the Trial Traffic Filters 2022, comprising traffic filter Experimental Traffic Regulation Orders (ETROs) on Hythe Bridge Street, Thames Street, St Cross Road, St Clements, Marston Ferry Road, and Hollow Way for a minimum trial period of six months.

The aim of the ETRO is to reduce traffic, improve bus journey times and make walking and cycling more convenient and safer.

The scheme includes:

- Exemptions for buses, coaches, taxis, private hire vehicles, mopeds and motorbikes, vans (excluding people carriers), Heavy Goods Vehicles (HGVs) and special vehicles (such as emergency vehicles)
- Permits for blue badge holders, professional health or care workers, non-professional carers (for operational journeys, not commuting), cars used as goods vehicles for business in the permit area, residents living in the permit area
 - o resident permits allowing permit holders 100 days per year to travel through the traffic filters, with up to 3 permits per household and 1 permit per person
- 2 new bus services

South Oxfordshire District Council supports the associated intended outcomes, particularly in light of the Climate Emergency. However we are concerned by some of the details of the scheme as currently proposed and consider these should be amended prior to the initial trial period. These concerns are set out below.

Permits

The permit area, as currently proposed, will lead to residents of Oxford being able to undertake a significant proportion of their journeys via car each year as normal, particularly households with multiple vehicles. However, all residents outside the permit boundary, which includes all the residents of South Oxfordshire, and all other drivers who would typically travel into Oxford, will not be able to apply for a permit and will be required to either pay the penalty charge for entering the traffic filter with a car, use the park and ride services on the outskirts of Oxford, use another mode of travel (if possible), or not travel into Oxford.

Arguably Oxford residents are the most likely candidates to be able to change their travel mode to walking, cycling and public transport, due to the urban character of Oxford, the enhanced walking and cycling infrastructure, the bus network, and the potential patronage demand to generate 24/7 bus services.

Noting the capability of Oxford residents to travel by sustainable modes other than a private car, it seems a missed opportunity to allow such high numbers of journeys to be undertaken through the traffic filters by Oxford residents. Those with mobility / employment related needs are already addressed by the list of permit allowances.

Restricting vehicles owned by residents who live in the rural districts outside the proposed Oxford city permit area penalises those who already have slow and expensive journeys to get to work in Oxford. By allowing households in Oxford to have three permits per household, the permit scheme as currently presented not only will promote travel by car by Oxford residents (benefitting from the reduced congestion inside the bus gates) but will also encourage higher car ownership.

Therefore, in the interest of fairness, the District Council considers permits should be granted to those who live further away from Oxford who need to access Oxford e.g. keyworkers living in South Oxfordshire's towns and villages. As opposed to those who live in Oxford and have the most opportunity to walk, cycle and take public transport. It is not clear how the boundary has been drawn and why some areas close to Oxford are included in the permit area e.g. Cumnor, while other communities in South Oxfordshire e.g. Horspath, Garsington, Sandford, Forest Hill, are not.

During workshop sessions on this subject, members of the project team indicated that charging for permits would complicate the issuing of permits due to time implications. However, it is clear that the administration and issuing of permits would be the greatest challenge and funds for permits would encourage permit holders to limit the number of permits they request and reduce the propensity for abuse of the system. This could also be brought forward with a greater cost to additional permits per household and thus make it less attractive for households to have multiple cars.

We would like to highlight that as proposed the permits do not preclude use of a private car to all other locations outside the traffic filters, for the residents considered eligible for a permit (which is the entire population of Oxford). Therefore the number of permits issued should take this into account.

Exemptions

Taking into account that one of the key aims of introducing the traffic filters is to make walking and cycling more convenient and safer, it seems unreasonable that HGVs and commercial vans are preferentially chosen to be allowed through the traffic filters. We understand that commercial enterprises located within the traffic filter area would need to receive deliveries and other commercial vehicle operations as required by their business. However, by allowing all commercial vehicles to enter the filter areas, this will result in improved journey times for through traffic HGVs and vans and may encourage HGVs to drive through the less congested roads of central Oxford as opposed to the ring road or other routes which are not controlled by traffic filters.

A possible strategy to reduce this effect could be to impose reduced hours for access by HGVs and vans, or perhaps allow business to issue permits to business needing to undertake deliveries in Oxford for their operation. For example, Kingston Town Centre, located on the outskirts of London operates a pedestrianised zone where all servicing and deliveries occur outside of the designated pedestrianised zone hours of operation. An intercom service with retractable bollards is provided for access within the restricted times for those with exemptions.

It is unclear as to why the scheme currently does not include car club vehicles in the exemptions list, to do so would help promote car sharing and help reduce private car ownership.

How will enforcement be managed for disabled users? Noting that disabled permits are issued to individuals not vehicles. The management of all exemptions will need to be explained for all user types in order for future users to be reassured that they will operate as intended.

As considered for commercial operations above, please consider the possibility of hospitals and GPs issuing permits to suitable individuals that need them to access healthcare services. This could be where temporary mobility issues occur and/or other mobility support is not yet provided.

Bus Improvements

We would like to take this opportunity to highlight what we consider to be a truly reliable bus service. A bus service that will allow users to choose travel by bus over their private vehicle must be cheaper or the same cost as car travel, be faster or the same travel time to get to and from their intended destination, and frequent enough 7 days a week to fit into their desired travel times. Clearly this is a challenging set of criteria to achieve for the majority of journeys, however these are the key challenges that are needed to be addressed to support modal shift.

The package of improved buses does not appear to solve transport into Oxford for residents of South Oxfordshire. The enhanced services should be reaching out into the districts, not just improving services within Oxford. For example, the transport measures in the Greater Cambridge Partnership City Access Plan 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. In contrast, this package appears Oxford-centric and not to have thought about those who will be most penalised – those who live outside the permit area, who will experience barriers and more complex costly journeys, but no improved public transport. We would have liked the County Council to involve the district council in the design of the scheme, rather than working with the City Council and presenting the package to us as a fait accompli just before the consultation stage.

The bus schemes being considered as part of the package look to increase inter-radial bus travel in Oxford, while the traffic filter scheme is looking to remove through town centre travel by private car. In theory this would both increase radial movements by private cars seeking to avoid the filters and add further public transport to these roads. It would seem sensible to see additional services on existing routes (or new services) through Oxford town centre to replace car journeys through the centre of Oxford which would see improved travel times from the proposed traffic filters.

Ring Road

Results of assessing the impact of traffic filters indicated an increase in traffic on the Oxford ring road. Concerns are raised for the impact on existing Air Quality Management Areas (AQMA) in the vicinity of the ring road. Notably, The City of Oxford AQMA which comprises a number of areas across the City's geographical area.

Furthermore, the District would like to request the assessment of impact on the operation of the A40 and A34 as a result of changes to the operation of the Oxford ring road.

Summary

Currently the details of the Traffic Filters do not address the needs of those living in South Oxfordshire who needing to access Oxford for work. The scheme will not reduce commercial through-traffic by vans and HGVs, and does not set aspirational targets for reducing car travel by Oxford residents (living within the permit zone area).

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