

CONNECTING OXFORD

A response to consultation, by Planning Oxfordshire's
Environment and Transport Sustainably (POETS)

October 2019

Who we are

POETS (Planning Oxfordshire's Environment and Transport Sustainably) is a group of current and former local authority officers and academics working in the field of planning and transport, whose aim is to support sustainable development in Oxfordshire.

Key points

1. POETS welcomes the thrust of the objectives and proposals and strongly endorses the view that demand management is an essential component of any attempt to achieve them.
2. POETS believes that, to maximise public support, the City & County Councils should articulate at the outset an exciting vision of how transport and the public realm will look in the Oxford region. In the future, people will not automatically choose to use the car for trips in and around Oxford because convenient, safe and attractive alternatives will be available and become second nature.
3. POETS believes that this vision needs to be enshrined in the forthcoming Local Transport Plan (LTP5) and Oxfordshire 2050, alongside a structured programme of how a new network of high quality public transport and cycle corridors allied to a step change in the quality of the public realm and environment – notably in the city centre – will be delivered. There would be a phased incremental programme of measures, with the proposals in this consultation paper forming a significant early step. In the longer term there could be aspirations for additional new rail or tram routes.
4. POETS believes that Oxfordshire and its district councils need, in all aspects of their planning, to take every opportunity to promote and develop policies that reflect the climate emergency and the need to enhance public health, by locating new housing as close as possible to employment, health facilities, schools and other facilities to minimise the need for travel and encourage greater use of sustainable modes. The emerging round of Local Plans – despite their stated policy objectives – are clearly failing to reflect this adequately.
5. POETS recognises that there is much detail work still required to bring the consultation proposals to successful fruition, but at this stage has concerns that the degree of restraint on vehicular traffic proposed may not be adequate to achieve the overall reduction required to transform conditions in Oxford. Its thoughts on this along with some suggestions are set out on the following pages.
6. POETS would welcome the opportunity to work more closely with the City & County Councils to develop these ideas.

Will the measures proposed reduce traffic levels sufficiently to achieve the objectives?

7. Other than in the city centre itself, there must be a doubt as to whether the measures proposed will be sufficient to reduce traffic levels on the radial roads and other parts of Oxford, such that free-flowing traffic can be expected at all times. Removing some current traffic will encourage other motorists to make additional trips that are currently deterred by congestion. Allowance also needs to be made therefore to counter a potential increase in such trips.
8. With that in mind, there might well be a need for additional restraint measures, which could include some form of congestion charge, even if only at peak times. Many motorists do not currently take into account maintenance, depreciation, tax and insurance costs, when deciding whether to make a particular journey and simply compare their marginal petrol costs with say the equivalent bus fare. The pricing (especially at the point of deciding whether and how to travel) of different modes of transport also takes little account of environmental costs. With the projected decline in national fuel duty income as the number of petrol and diesel powered vehicles on our roads reduces, it is inevitable that there will need to be some form of “pay as you go” mechanism for raising future revenue for maintenance and management of the transport infrastructure. The sooner this is introduced – to ensure that people using say electric vehicles still make an appropriate contribution – the better.
9. It seems inevitable that there will still be the need for some bus priority measures on the approach to heavily trafficked junctions.
10. The proposed traffic restriction points across the **Eastern Arc** will reduce traffic in their immediate vicinity but are likely to displace considerable volumes of traffic onto adjoining streets, many of which are residential in nature and unsuitable. Significant additional measures will be necessary to minimise or prevent this. There are already some narrow residential streets which are carrying volumes of traffic which far exceed what is desirable (examples include Howard St, Magdalen Rd, Divinity Rd and Southfield Rd in east Oxford). The councils should consider introducing measures that dramatically improve conditions in such streets for residents and others, particularly students walking or cycling to school. For example, closing such streets to through traffic other than cycles, emergency vehicles and public transport (potentially much easier with the introduction of initiatives such as the PickMeUp minibus service) should be considered on an area-wide basis.
11. The measures proposed are also unlikely to achieve the objective of free-flowing traffic across the whole of the Eastern Arc. Given the demands for access to hospitals, and other major facilities, with all their visitor parking, it seems likely that large volumes of traffic will still be accessing the area. The current level of congestion is such that further measures may well be required. While congestion charging could be part of the solution, further physical traffic restrictions may be necessary. One possibility might be to close a length of London Road to through traffic - apart from buses, cycles and emergency services - one side or other of the Windmill Road/Old High Street junction in the centre of the shopping area.

This could also create a much more pedestrian friendly and attractive environment. Another traffic restriction point might be considered on the Cowley Road.

12. The Workplace Parking Levy could make a valuable contribution to reducing traffic, but there would remain a large volume of employee parking spaces outside of the proposed area which will generate a substantial volume of traffic. It may prove necessary to extend the proposed Levy Area and it might be more logical and better understood – and therefore accepted - by the public, if it were to apply to the whole city plus those significant areas of parking around the outside of the ring road. There are substantial areas of parking around Oxford, for instance at retail and business parks, which would appear not to be affected by the proposed Levy. Significant new areas of parking are being considered in relation to new development in locations such as Begbroke where again the volume of employee parking would need to be curtailed.
13. For the proposed scheme to be successful, it is essential that a range of new bus services – with a minimum 15-minute daytime frequency – and additional Park & Ride capacity are in place beforehand. Most of Oxford’s bus routes radiate out of the city centre. There is a need for significantly more “orbital” services to link places together to accommodate many of those trips which could no longer be made by private car (other than by lengthy and undesirable diversions via the Ring Road). In the city centre, bus services generally circulate around the central core and users are often faced with lengthy walks between stops to make cross-city journeys, which for many people is challenging. Consideration needs to be given to either re-linking some services across the city centre via Cornmarket, or to the introduction of a new shuttle service – which could be a small electric vehicle – offering frequent (free) links between the main clusters of bus stops.
14. As well as high quality information and infrastructure at bus stops, there is a need to move towards total off-bus ticketing to speed up journey times and minimise the physical impact of buses waiting at stops.
15. A period of monitoring, review and adjustment will be needed with thorough and open public engagement. A budget should be set aside to cater for any early adjustments that are required. In parallel with this, the Councils must develop a package of measures to capture the benefits of the traffic reductions with enhancements for the priority modes and establish a programme and budget for this, so that the work can proceed at the earliest possible opportunity.

Details of scheme development

16. For the scheme objectives to be met, the measures introduced will need to achieve a substantial change in behaviour. Many current trips would no longer be possible without a significant change of route or mode of travel. The impact on residents and businesses in many parts of the city could be significant. It is important to recognise that for a sizeable proportion of these trips, it will not be easy (or even practical) to change to a different mode. This will be particularly the case for trips in to the city centre. For these reasons the detail measures will need to be developed with great care and extensive consultation with those directly affected and in particular have regard to:

- a) essential servicing traffic, including refuse vehicles
- b) access for utilities
- c) the mobility impaired
- d) access for health and care visitors and public access to health facilities
- e) the emergency services
- f) access to Gloucester Green bus station
- g) access for tourist coaches
- h) re-routing of Express/long distance coach services
- i) how the Westgate, Gloucester Green and Worcester Street car parks are accessed in the future, and in particular whether it would now be appropriate for the Worcester Street car park site to be redeveloped in same way and put to alternative use(s)
- j) access to blue badge parking spaces
- k) access to off-street premises in the city centre generally
- l) the need to periodically close or restrict access to lengths of street for essential utility works or special events, emergencies or other incidents. It is important that thought is given to retaining alternative routes for traffic at such times. A degree of redundancy and flexibility therefore needs to be retained in the network such that traffic could possibly be allowed into an otherwise restricted street at such times (and using surfacing material that can take the passage of motor vehicles) if required
- m) how the space freed up by removal of traffic is reallocated and the community benefits best captured
- n) how best the public realm can be enhanced particularly in city centre streets such as St Giles and Broad Street.

POETS responses to questions raised in the consultation document

Vehicle exemptions at traffic restrictions

17. The more classes of vehicles that are permitted to proceed through the restriction points, the less effective they will be, whether abused intentionally or unintentionally, say because the signing is less clear and/or having differing restrictions at different locations. For these reasons, it is important that **only authorised bus services, cyclists and emergency service vehicles should generally be exempted**. Consideration should be given to allowing taxi or private hire vehicles at some locations, but their physical appearance can inadvertently lead other motorists unfamiliar with the regulations to believe that they can also go through. There is already a significant amount of “innocent/accidental” transgression of the existing restriction points such as High Street. The Councils also need to guard against the possibility that at some future date an “Uber” style service might be established in Oxford, which if exempted from the restriction points could undermine the objective of reducing traffic.

Times of restrictions

18. As above, the more variations there are, the greater the likelihood of vehicles contravening the restrictions and undermining their effectiveness. In the city centre there is a strong case for them applying 24 hours a day 7 days a week (including High Street) to enhance safety and assist the high numbers of pedestrians and cyclists. This would also strengthen the opportunity to enhance the public realm and street ambience.

Other complementary measures

19. A core high quality network of safe, continuous, convenient and well-maintained cycle routes needs to be widely established across the city and beyond, designed so that they will attract many new cyclists. A core objective should be to address pupils’ journeys to school many of which are currently undertaken by car due to cycling being perceived as unsafe. Existing cycle routes should be comprehensively reviewed and improvements made where necessary; for example, there are many currently signed cycle routes which are indirect, have frequent “give way” signs, are poorly maintained, and in many cases are downright dangerous e.g. where they are on-road but in the door-opening zone of parked cars (Warneford Lane is an example of this).

20. The other priority must be to bring forward high quality public realm enhancements in the city centre, which might also involve removal of some on-street parking spaces. Removal of on-street parking places may also need to be reduced, to reduce the temptation for people to drive short distances and circulate searching for a space. The councils should also aim to remove pavement parking, which discriminates against users with mobility problems or people with young children. This may mean reducing the number of permits available in CPZs to one per household, as happens in cities such as Amsterdam. All such changes would need to be accompanied by appropriate enforcement.

Locations of restriction points

21. To be fully effective while not proving unduly disruptive to residents and businesses in their vicinity, great care and thought will be needed to assess how premises will be accessed and ensure reasonable alternatives exist for the many trips that will always require the use of a motor vehicle. These routes need to be clearly legible to motorists to avoid abuse of the restrictions and distress to road users. Particular care will be needed to cater for people with health and mobility problems and in the vicinity of health facilities.
22. If alternative routes are readily available in the vicinity of a restriction point, it must be assumed that substantial numbers of motorists will choose to take them. These need to be identified and additional measures will be needed to protect many of these routes, unless a better position for the restriction can be found.
23. Displacement of traffic onto other routes will be a particular challenge at the proposed restriction in Hollow Way, while in the city centre, narrow streets coupled with potentially large servicing vehicles that cannot easily turn round, mean particular care will be needed to find the optimum locations.

Boundary of Workplace Parking Levy

24. Wherever the boundary is established, it is likely to lead to a considerable increase in parking outside the zone particularly on adjoining streets. It is likely that many motorists will be prepared to walk a considerable distance to retain free parking. On balance, it appears that the proposed area is too tightly drawn. There is already considerable commuter parking to the east of the proposed area, notably on the eastern side of the Eastern by-pass which must contribute significantly to the traffic and congestion on the city and county's roads. It may be that the scale of traffic reduction achieved by the current proposal would not be adequate unless a larger area is controlled.
25. Much of the city is excluded from the proposed Workplace Parking Levy Area. While concentrations of parking in other parts of the city might not be as great as in the Eastern Arc, it does seem that there is a case for the whole of the city to be covered and some of the adjoining areas including business parks outside of the ring road. Without controlling these, there is a risk that the level of traffic reduction would not be sufficient to achieve the scheme objectives.

Level of Workplace Parking Levy

26. The suggested charge range seems appropriate given the cost of the alternatives such as bus fares. It would introduce more equity into the travel options and choices people make, as a free parking space in Oxford is an extremely valuable commodity and greatly influences the travel choices people make. A charge for parking would incentivise employees to consider other alternatives including cycling, and could in time free up valuable land – currently occupied by parked cars - for alternative use.

Employer and employee benefits

27. The suggested financial packages and incentives are sensible and reasonable. Very close working with employers using knowledgeable advisers ahead of the introduction of any scheme will go a long way to making its introduction a success. Employers whose development proposals will place additional demands on the transport system in and around Oxford (e.g. from the University's proposed developments at Begbroke and at the hospital sites) should make significant contributions to producing satisfactory solutions.
28. The suggestion of providing reserved areas at Park & Ride sites however could lead to inefficient use of space and introduce additional management costs. The key is to ensure that there will be sufficient space available for all users and no special measures would then be required.

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