

Policy & Programmes

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Dear Temporary Congestion Charge Team,

Thank you for inviting responses on the Temporary Congestion Charge proposal, sought to be progressed using the Transport Act 2000. We note this covers: Hythe Bridge Street, Thames Street, St Cross Road, St Clements, Marston Ferry Road, and Hollow Way. The charge will be in place until Botley Road reopens to general traffic and the Traffic Filters Experimental Traffic Regulation Order (ETRO) trial comes into force, which is expected in August 2026.

The aim of the Temporary Congestion Charge is to reduce traffic, improve bus journey times and make walking and cycling more convenient and safer in Oxford.

The scheme includes exemptions and permits for:

- Buses, coaches, taxis, private hire vehicles, mopeds and motorbikes, Light Goods Vehicles (LGVs), Heavy Goods Vehicles (HGVs) and special vehicles (such as emergency vehicles)
- Blue badge holders, professional health or care workers, non-professional carers (for operational journeys), business cars used as goods vehicles
- Residents living in the permit area
 - o Resident or commuter in Central Permit Area – unlimited travel through congestion charge locations (plus 50 visitor day passes per resident per year)
 - o Resident in Oxford Permit Area - 100 day permits per year, 1 permit per resident, up to 3 permits per dwelling, up to 3 cars per permit
 - o Resident in Oxfordshire Permit Area – 25 day permits per year, 1 permit per resident, up to 2 permits per dwelling, up to 3 cars per permit

The income generated by the scheme may be used to fund:

- Free or discounted parking at park and ride sites
- Discounted bus fares and park and ride bus fares
- Improved bus services

South Oxfordshire District Council supports the associated intended outcomes of the scheme, particularly insofar as they help tackle the climate and ecological emergencies¹. We support using the funds gathered by the congestion charge to help subsidise public transport travel and use of Park & Ride sites.

The district council is particularly interested in possible frequency improvements, increased operational hours of, and fare reductions for the following bus services:

- 400 for Wheatly and Thame
- 275 for Chinnor
- 46 for Great Milton
- 11 for Watlington
- X40 for Berinsfield, Crowmarsh Gifford and Wallingford (and Reading)
- 45 for Culham and Berinsfield
- X2 for Didcot

While we support these potential improvements to services in our district, we are concerned by other aspects of the proposals. Below we have set out some suggested improvements or considerations.

Permits / Permit Area

The number of permits afforded residents of the “Oxford Permit Area” is greater than those for the “Oxfordshire Permit Area”. Arguably Oxford residents are most likely 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 to diminish the effectiveness of the charge to allow such high numbers of journeys to be undertaken through the Congestion Charge filters by Oxford residents. Those with mobility / employment related needs are already addressed by the list of permit allowances.

Using greater restrictions for vehicles owned by residents who live in the rural districts penalises those who already have slow and expensive journeys to get to work in Oxford, noting the proposal does not provide improved journey times to park and ride sites or locations outside of Oxford.

¹ [Action on climate and nature - South Oxfordshire District Council](#)

Permitting households in Oxford to have 3 permits per household and up to 3 cars per permit would equate to 9 cars per household. The scheme as currently presented not only could promote travel by car by Oxford residents (benefitting from the reduced congestion inside the Congestion Charge filters) but could 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 greatest 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. residents in parts of Shotover and the northern end of Barton Village Road, while other communities in South Oxfordshire are not e.g. residents on Bayswater Road near Shepherds Pit, Horspath and residents living between the River Thames and A4074.

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 the requirement for funds for permits (per vehicle) 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 and vehicles per household and thus make it less attractive for households to have multiple cars.

Exemptions

Taking into account that one of the key aims of introducing the charging scheme is to make walking and cycling more convenient and safer as well as buses more effective, it seems unreasonable that LGVs, HGVs, and commercial vehicles are preferentially chosen to be allowed through the Congestion Charge filters. We understand that commercial enterprises located within the charging scheme 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 Congestion Charge filter areas, this will result in improved journey times for through traffic in the form of LGVs and HGVs and may encourage such vehicles to drive through the less congested roads of central Oxford as opposed to the ring road or other routes which are not controlled by the charging scheme. Noting larger vehicles are more intimidating for vulnerable road users this is of considerable concern.

A possible strategy to reduce this effect could be to impose reduced hours for access by LGVs and HGVs 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.

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

Ring Road

The congestion charge is considered to help improve walking, cycling, and bus journeys in the city, however the ANPR cameras are set up to encourage car drivers to divert out of the city centre and onto the ring road. This is shown by the modelling to increase the traffic flow on the ring road itself, as well as key roads leading to and from the ring road, from diverted traffic.

These roads are or could be used by pedestrians, cyclists and buses undertaking longer journeys between the District and the City. Thus, the congestion charge may only benefit bus and cycle movements in the very heart of Oxford city and may lead to a worsening of journey experience and journey time where they pass through the ring road.

Concerns are raised for the impact of diverted traffic on existing Air Quality Management Areas (AQMA) and Special Areas of Conservation (SAC) 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 and Oxford Meadows SAC which straddles both the A40 and A34 which form part of or interplay strongly with the ring road, located to the west of Oxford City.

Through Traffic

Inherently the scheme is designed to prevent through traffic, however the details of advance notices for drivers on the roads approaching Oxford has not been shared as part of the materials in this consultation. Advanced warning signage, which would notify drivers of the congestion charge before entering the ring road are fundamental to the operation of the scheme and should be detailed from the outset.

Without effective advanced warning for drivers, drivers who seek to drive through Oxford City may continue to do so. Drivers may acknowledge the signs immediately in front of the ANPRs and may then turn around and head back to the ring road. This will generate more traffic travelling on the roads leading to central Oxford. Alternatively, this may encourage drivers to pay the charge, to save wasting time and fuel driving back to the ring road. These negative effects will be particularly prevalent at the start of the scheme, for non-local drivers, and for inexperienced drivers.

Similarly, satellite navigation systems will continue to send drivers through the ANPR cameras, particularly at the start of the trial. Navigation systems will unlikely be able to communicate the times that the restrictions are / are not in place. It is unclear how this can be avoided or rectified.

Specific comments on the reports

The "Temporary congestion charge business impact assessment technical note" indicates that access by "all modes" is restricted by the Botley Road closures, however a walking route has been, and is sought to be maintained during the entire programme of works for Oxford Railway Station. We are also aware that both cyclists and motorcyclists frequently push two wheeled vehicles through the pedestrian route also.

Noting the Oxfordshire Strategic Model only models traffic and public transport, it is unclear how walking and cycling trips are estimated in Table 3-2 of the "Modelling and Income Forecasting Report". While the data shown to compare shift to cycling unexpectedly shows a betterment in shift to cycling for £3 user charging when compared with £5 user charging. It is also unclear why the interpeak for Hollow Way, noting the Congestion Charge is not operational during that time, is 14% for the £5 charge but -2% for the £3 charge, as set out in Table 3-3 of the same report.

Paragraph 4.7 of the "Modelling and Income Forecasting Report" erroneously states that the modelled base year is 2023. The base year, as detailed in Section 2 of the report (2.4-2.5), is 2018, while 2023 is in fact the "forecast year".

Summary

We welcome the objectives of the congestion charge, especially as it can help address the climate and ecological emergencies we are facing. However, currently the details of the scheme do not address the needs of those living in South Oxfordshire who need to access Oxford, will not reduce through-traffic by all vehicles but particularly LGVs and HGVs, and does not set aspirational targets for reducing car travel by Oxford residents. The scheme therefore is likely to worsen journeys taken by active and sustainable transport modes which pass through the Oxford ring road.

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