

Oxford Zero Emission Zone - Feasibility Study

Oxford Civic Society – response to consultation

Summary

- **We urge further research into the background of current behaviour patterns, in order to better assess the social and environment effects of the proposed regulation.**
- **We urge very careful re-consideration of the timescale, with reference to the social, cultural and commercial life of the city.**
- **It would be highly appropriate for a coordinated strategy to be developed for improvement of air quality as well as congestion, by a series of measures of which a ZEZ was one.**
- **Consideration of other aspects of the built environment, for example the effects of introduction of the ZEZ on business viability requires more detailed analysis and, if necessary, fine tuning of zone boundaries.**
- **We believe that the dates for progressive implementation of the ZEZ should be kept under review, so that unnecessary regulation is avoided, but maximum benefit is taken of advantageous developments.**

OCS Response

1. Both qualitatively and quantitatively, it is clear that air quality in certain parts of Oxford is unacceptable – serious health effects are now apparently proven, from existing medical records, so action is necessary to address a current serious problem, not some debatable potential future phenomenon.
2. In the light of this, radical measures to eliminate noxious vehicle emissions would be welcome, on the grounds of the health improvement benefits to all residents and visitors to the city, as well as the enhancement of its world-renowned environment.
3. The current conditions are largely the consequence of individuals' choices in travel behaviour – who travels, where, when, why and how they travel, and what options are open to them in terms of alternatives.
4. We would accept that the introduction of a ZEZ, albeit progressively, will necessitate changes in behaviour which will be perceived by some individuals and organisations as an infringement of rights, or as detrimental to their particular interest, or that of the city.
5. Clearly, then, the challenge will be to maximise the benefits of environmental improvement, whilst mitigating the detrimental, or perceived detrimental effects of regulation.
6. Assessment of the effects of introduction of a ZEZ is clearly highly complex; prediction of air quality improvement is probably the easiest part of the process. Assessment, let alone quantification of the effects on travel behaviour and economic behaviour seems much more difficult.
7. A significant shortcoming of the current proposals is the limited availability of hard data on current transport issues. Whilst the mix of vehicle types (including cycles) for individual streets and across time periods may be known, there appears to have been no analysis of the motivation for travel, the reasons for choice of any particular mode of travel, and hence the alternatives available. In addition, much more comprehensive work needs to be done on what movements are absolutely

essential in the city centre e.g. deliveries, ambulances, doctors and nurses, plumbers and builders etc. Prediction of behavioural change when nothing is known of the background to current patterns is likely to be difficult. **We would urge further research into the background of current behaviour patterns, in order to better assess the social and environment effects of the proposed regulation.**

8. The proposed timescale for introduction of the first-stage ZEZ is tight; whilst, arguably, measures to improve air quality are long overdue, and the social and economic effects of poor air quality have no doubt already been significant, the introduction of the zone is proposed with little notice, or apparent consideration of the consequences or feasibility for many individuals, institutions and organisations of making critical changes to behaviour and business practice. The technology for all of the appropriate electric vehicles is also very unlikely to be available by 2020. Such electric vehicles, if and when they are available, are likely to be expensive and out of the pocket of many potential users. Virtually all of those needing access will require at least 5 years lead time to change to new vehicles because of the existing vehicles and fleet of vehicles they currently possess. **We urge very careful re-consideration of the timescale, with reference to the social, cultural and commercial life of the city.**
9. The proposals also need to be seen against the effects of other measures being pursued across the city and beyond, to restrict traffic flows and to promote mode-shift to alternatives such as public transport, including rail travel, and walking and cycling. A more comprehensive approach to bearing down on pollution is needed with such measures as congestion charges, work place parking levies, strong enforcement of the law against idling engines of parked vehicles, banning coaches from parking in St Giles, etc. **It would be highly appropriate for a coordinated strategy to be developed for improvement of air quality as well as congestion, by a series of measures of which a ZEZ was one.**
10. The selection of boundaries for the proposed phased introduction of a ZEZ appears to have been made on the basis of technical assessment of air quality, but with little consideration of other aspects of the built environment, such as the importance of commercial activity, the extent to which it is dependent upon polluting transport vehicles, or the effects of introduction of the ZEZ on business viability. **We would urge a more detailed analysis of these issues and, if necessary, fine tuning of zone boundaries.**
11. The current proposals appear to set somewhat rigid timetables for the introduction and progressive expansion of both the geographic boundaries of the ZEZ and the categories of vehicles restricted. However, some of the issues mentioned above are likely to influence travel choices and make-up of traffic.
12. Furthermore, vehicle technology, as well as national and wider legislation is likely to have a major effect on the practicality, availability, cost and take-up of zero-emissions vehicles, but, again, the influence of these factors in determining behavioural change is difficult to predict.
13. Both these factors mean that the effects of the ZEZ and the priorities for its expansion are unlikely to follow current predictions, certainly over the next 18 years. Given that the UK Government has set a deadline for the termination of production of ICE vehicles by 2040, we might expect that local ZEZs will become irrelevant sometime before then, at least in terms of the number of polluting vehicles on the road and entering Oxford. Just when this might be the case must be kept under review. **We believe that the dates for progressive implementation of the ZEZ should be**

kept under review, so that unnecessary regulation is avoided, but maximum benefit is taken of advantageous developments.

14. The introduction of the ZEZ is a recognition that air pollution has become an unacceptable health hazard. It requires a shift in the recognition of what is socially acceptable. The City Council and the County Council will, therefore, have to work closely with the business interests as well as pursuing their current programmes such as Stop the Oxford air Pollution (STOP), with schools thus influencing the younger generation (we offer them our support). In addition, the whole question is not limited to the centre of Oxford and the suggested ZEZ's, but involves the entire transport system for Oxfordshire and its residents and visitors who come to Oxford. It needs to be integrated with an updated Local Transport Plan.



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