



## Oxford Civic Society

### Oxfordshire County Council consultation on trial traffic filters 2022

*Set out below is the Oxford Civic Society response to the Oxfordshire County Council consultation on trial traffic filters in the city of Oxford. A summary of our recommendations is provided at the outset.*

### Summary of Oxford Civic Society findings and recommendations

#### Findings

- We fully agree with the objective of the County Council's demand management initiatives, but are very concerned that limited information availability and poor communications has created unnecessary resistance to the traffic filter proposal and has constrained effective consultation.
- In particular more information about the process by which estimates of traffic reduction were derived should have been available.
- There appears to have been reluctance to publish detailed findings during the consultation period, possibly because the modelling is insufficiently reliable at the micro level.
- Unfortunately, it is also the case that the production of modelling findings has lagged behind the consultation period.
- More needs to be said about the population who will benefit - as opposed to those who experience disbenefits (and it should have been clear how the disbenefits will be addressed e.g., residents' permits).
- Modal transfer to buses is ruled out for many people by the cost of travel and the fixed nature of the routes i.e., the buses don't go to many places where people want to travel. Introducing filters without commitments on bus services is just a shot in the dark
- At least some indication of why traffic filters have been prioritised should have been provided. Are the Workplace Parking Levy and Zero Emissions Zone much less significant?
- Have other options been evaluated, e.g., a city-wide congestion charge (as currently being considered in Cambridge).
- Because of the deadline for confirmation that traffic filters will be trialled, OCS (and other respondents) seem to have no option but to support the main thrust of the proposal, even if we remain to be convinced that it strikes the right balance between restrictions/exemptions and effectiveness. Is it not possible to negotiate a later deadline providing more time for a proper consultation?
- Is agreement that the traffic filters will be trialled enough to convince bus operators to invest their share of the expenditure on the all-electric bus fleet – or does it effectively imply that the trial will definitely lead to permanent application of traffic filters?

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- **How can you implement and evaluate the impact of the traffic filters in 2023, given the closure and constriction of the Botley Road in connection with the station redevelopment?**

### Recommendations

- **An extended consultation period (or one or two months) could give time for modelling to be more advanced and made public (i.e., the Forecasting Report which is currently expected to be completed in November, in time for the County Council Cabinet meeting that will make the decision, but not in time for public consideration).**
- **Traffic filter implementation and monitoring arrangements must be thoroughly discussed and agreed with communities throughout Oxford and arrangements made for community participation in the agreed monitoring programme.**
- **Early and thorough discussion of the monitoring report is essential – and this should be before decisions are made in November.**
- **Clearly public participation will need to be significant during the traffic filter trial implementation period; could this include, but not be limited to, a citizen’s assembly for transport?**
- **Adjustments to the operations of the filters should be possible during the course of the experimental implementation, linked to the monitoring process.**

## 1. Consultation and engagement

### 1.1. Paucity of information about the potential impact of the filters

1. The concept of traffic filters was first introduced in 2015 in the Oxford Transport Strategy which was part of the county’s local transport plan. There has been engagement with residents, community and business groups over the last few years. The latest proposals have changed, taking into account feedback from earlier engagement, more recent changes including residents’ day passes, exemptions for HGVs and vans, etc.

2. Even so, the face-to-face and on-line meetings to discuss the proposed traffic filters have revealed very great public concern about the potential impact of the proposed traffic filters on everyday life. Many case studies have been provided at these meetings and in local newspapers of likely impacts. We have a file of over 100 such case studies<sup>1</sup> culled from the public meetings and from residents’ association meetings. In some cases there is inconvenience, in others hardship, and, in many cases, there are questions about the sense of diverting car journeys over great distances, with possible congestion on diversion routes, including the ring road. Overall, we take the view that adequate modelling of the impact of the filters and thorough explanation of the results, in public meetings and in the local press, would have addressed many of the concerns being expressed.

3. The plans also appear to fail to start from the limited data that does exist on current congestion experience in the city. These show that congestion is 'tidal' - peaking with the morning and evening commuting/school journeys, and light/non-existent during the middle of the day. Taking that as a starting point, the question is how to get modal shift for commuters and school journeys? The latter should be dealt with by expanding the school bus facilities and arrangements as well as local schemes to encourage cycling and walking. The former could be dealt with by road charging in the peak hours or by just two filters in Holywell and Hythe Bridge St operating at the peak periods. These would eliminate all cross city commuting.

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<sup>1</sup> Available on request

## 1.2. Modelling

4. It seemed to OCS that one of the problems with the proposals, as set out in the consultation documents and as described in the public meetings, is that little evidence is provided of the likelihood of the achievement of the benefits of the traffic filters<sup>2</sup>. The current consultation provides a summary of modelling<sup>3</sup> undertaken to provide this evidence, but the summary is very superficial. Our concerns focused on:

- The absence of any base data or detailed forecasts to be shared with consultees, which is very unsatisfactory. It suggests to us that the Council's transport technical teams lack the capability to provide to decision makers with: (i) quantified statements of the base position; and (ii) forecasts of the impact of options for change. The absence of any information on options (i.e., what would be the impacts of implementation of the enlarged Zero Emissions Zone, or Workplace Parking Levy) does not enable the choices surrounding impending decisions to be understood. Would the impact of the Work Place Parking Levy and/or Zero Emissions Zone be much less significant? Are there modelling results to back-up the choice of the traffic filters option?
- As opposed to the general benefits of a filter scheme, the lack of emphasis on how the particular version proposed is the most effective/equitable in delivering its objectives (and why possible alternatives, especially 'do nothing' are not).
- Traffic filters specifically – the consultation on traffic filters describes their introduction as a trial and we understand that generally a lower level of transport modelling may be appropriate for a trial if it has a limited impact on the community. **But this project involves a large amount of expenditure and could have very significant impacts – favourable and adverse – on people and businesses across the city and outside.** We think it very unsatisfactory that no quantified base position has been published and only a scant and generalised estimate of the impact of the proposals.

5. We acknowledge that it may be that the traffic filters proposals are so complex that modelling cannot give us a good indication of the outcomes. A trial may be the only way to identify whether the hoped-for outcomes can be achieved. If so, it would be helpful if that point was made clear now, so that due emphasis can then be placed on the arrangements for implementation, monitoring, review and subsequent improvements.

6. OCS made these points to the leader of the County Council and the two County Council cabinet members mostly concerned with the traffic filters, and a meeting was arranged between OCS and County Council officers and modelling consultants to better understand what evidence is available to provide an indication of the outcomes and to consider what kind of monitoring will be necessary during a trial period. The findings of this meeting were not encouraging:

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<sup>2</sup> The proposed traffic filters are expected to:

- o Reduce traffic levels by around 20% across the city within the ring road.
- o Reduce traffic levels by more than a third within the city centre.
- o Increase bus and Park and Ride use by up to 10%.
- o Enable new and improved bus routes.
- o Reduce overall accidents within the city by up to 15%.
- o Significantly improve air quality due to traffic reductions.
- o Increase cycle mode share by over 10%.

<sup>3</sup> Oxford Traffic Filters – Summary of Transport Modelling and Annex 1: Further Details on the Transport Model

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- The key issue in our view is the credibility of the published estimates of overall traffic reduction in the city so the important question is the process (methodology) by which these estimates were arrived at. Three steps in this process seemed to us to be critical, but information on these steps is not currently available:
  - i. As a proportion of total motorised traffic in the city, an estimate of the number of car driver trips that would be impacted by the filters (i.e., excluding exempted vehicles, permit holders and 'intrazonal' journeys that do not involve crossing any of the filters)
  - ii. An estimate of the responses of impacted car drivers, in particular the division between those whose journeys are suppressed or transferred (e.g., by mode) and those which are retained but are diverted via an alternative (longer) route.
  - iii. Because of the extent of exemptions etc. in (i) and the additional mileage incurred by diverted journeys in (ii) the % reduction in impacted car driver journeys will need to be substantially greater than the published estimates of overall traffic reduction. But how much greater?
- Oxfordshire County Council uses a strategic model that has a fine grain representation of zones and networks within Oxford City and incorporates an iterative process of reassignment in response to congestion. In principle this should be suitable for portraying the effects of the proposed intervention – but uncertainty is acknowledged in at least the following areas:
  - around behavioural responses to residents' permits
  - transfers to walking and cycling are estimated, not modelled
  - bus speeds are investigated separately on each corridor, but the likely effects on actual operations are not clear.
- It is understood from the consultation documents that the location of the traffic filters has been informed by transport modelling, traffic data analysis and highway design considerations. It is also understood that traffic filter locations are designed to deliver traffic reduction benefits across the city and not just at the point where the traffic filter is located. But there is no available explanation and modelling data to justify the locations chosen, including showing how a traffic filter in one location may also lead to greater traffic reduction in other areas across the city. Without this information it is very difficult to respond to the consultation.
- It was confirmed that further reports based on modelling are being prepared: (i) a Validation Report (confirming the approach to modelling underpinning the proposals); (ii) a Forecasting Report (providing the model's conclusions on the transport system in 2024<sup>4</sup>); and (iii) a Monitoring Report (assumed to be a proposed monitoring strategy for the trial period). These reports are being prepared but are not planned to be made publicly available before the decision is taken in November.
- There is an apparent reluctance to publish evidence, including assumptions, underpinning the estimated outcomes. This has repercussions for the forthcoming monitoring framework, which needs to address not only physical outcomes but also the behavioural responses which underly them, so that if changes to the scheme are to be made in future they may actually be for the better!

### 1.3. Timing of decision taking

7. The consultation and approval processes are not closely linked. The final consultation period before planned decision taking has been extended to October 13<sup>th</sup> (largely because of postponed meetings due to the mourning period). It is planned that a decision will be made in November 2022

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<sup>4</sup> The Forecasting Report will include base flows and forecast changes from the traffic filter interventions for traffic flows across screen lines.

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and this decision timing is linked to the need to confirm that adequate traffic management measures will be implemented to give the bus companies the confidence to agree to their contribution to an all-electric bus fleet. This confirmation is necessary by end November 2022. However, the information necessary for consultation has not been made available during the consultation period (but only shortly afterwards).

#### 1.4. Implementation

8. The county council's cabinet members will consider feedback from this consultation alongside the results of technical assessments before making a decision on introducing the trial traffic filters. If the cabinet decides to implement the trial traffic filters, they will be introduced under an experimental traffic regulation order (ETRO) next summer for a minimum of six months.

9. During this trial period, the county council will collect information on the effects of the scheme such as changes in traffic levels and bus journey times and will also invite residents, businesses and other stakeholders for their views. **The way in which this is to be done must be thoroughly discussed with communities throughout Oxford and it is recommended that there is public involvement in the monitoring process. OCS is willing to support this.**

10. It is understood that at the end of the trial (which could last longer than the first six months, up to a maximum of 18 months), the council will make a decision on whether to make the traffic filters permanent and finalise the exemptions, timings and locations based on all the information collected and feedback received. **This stage will also require thorough discussion with communities.**