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**Submission to consultation, Proposed local charging scheme for the ZEZ pilot**

**Introduction:**

This is the submission of the Cowley Area Transport Group to the consultation on the proposed local charging scheme for the ZEZ pilot. Whilst the principle of a Zero Emissions Zone is accepted, there are many issues which must be addressed if this term is to be meaningful.

We believe that the Red Zone should be ZEZ pilot. The chosen minimal Pilot area has no justification. This should be a precursor to a planned series of zone extensions to cover the City with each stage accompanied by enhanced active travel measures – essentially to create better walking and cycling routes forming a City wide network for each active travel mode. We should note that the Chancellor is considering the possibility of Electronic Road Pricing.[[1]](#footnote-1) This could have implications for charging in any given Zero Emissions Zone – or Ultra Low Emissions Zone as it should more appropriately be named. We have prepared an Oxford trial model for Electronic Road Pricing, covering the Oxford City Region, and hope to update this once the Treasury releases its Paper on Electronic Road Pricing, as has not been made available so far.[[2]](#footnote-2)

This submission starts with the rather serious omissions in the work done on this topic so far.

**Omissions:**

Reducing air pollution in Oxford has many prerequisites.

1. **The Cambridge-Oxford Expressway cannot be permitted**. If local councils are serious about air pollution reduction then any initiative likely to substantially increase road traffic heading into Oxford cannot be contemplated. Resources envisaged for such an obviously unsustainable road project would be better diverted to rail improvements, including full electrification of railway lines in general and re-opening of the Witney/Carterton – Oxford – Cowley – Wheatley area rail line to reduce traffic levels in Oxford. Similarly, the restoration of subsidised bus services should occur at the earliest possible date along with fully electric buses. In addition, all of the proposed routes for this Expressway cross Green Belt so it should be rejected on those grounds in relation to the stated policy preferences indicated in the National Planning Policy Framework, that development should not take place on Green Belt. In short, making a meaningful Zero Emissions Zone must address all sources of additional traffic which threaten to create more noise, traffic congestion and air pollution in the City;
2. **Pedestrianisation and Pedestrian Priority extensions in central Oxford.** Air pollution in the City of Oxford is at its worst in areas which should have long been pedestrianised or made into pedestrian priority areas. Since air pollution will not be rectified even if all vehicles entering central Oxford are wholly electric, a large in increase in pedestrian-friendly coverage of central Oxford is needed. Problematic emissions do not just come out of tailpipes, they also come from brake wear, tyre wear and road surface abrasion.[[3]](#footnote-3)  It therefore seems desirable to pedestrianise Broad Street, partially pedestrianise St.Giles and seek to systematically reduce traffic movements in surrounding streets in a rolling programme of traffic reduction measures. In the long-term, a much more attractive City Centre free of traffic and air pollution would include pedestrianisation of Little Clarendon Street, permanent pedestrianisation of Queen Street, maintenance of pedestrianisation of the Cornmarket etc. This would involve more initiatives to give pedestrians priority, a larger area in which only buses and taxis would be free to move on weekdays, and radical restrictions on the hours during which delivery vehicles are permitted access into the area. We are reluctant to limit how far such measures should extend from Carfax Tower outwards because to do so is to maintain (or perhaps even create) a zone of pollution outside the area designated.
3. **Cycling provision in the City**

Cycling is a pollution free transport mode which also enhances public health and increasing cycling is Oxford should be a priority. Far more consideration should be given to a cohesive cycling network with full separation from motor vehicles wherever possible. There should be a radically enlarged area of the city centre which is traffic free and solely for pedestrians and cyclists. We feel the full intended zone should be the Pilot.

1. **Car parking is too generous in central Oxford:** The establishment of Park and Ride sites serving Oxford should have been accompanied by significant reductions in car parking to help reduce air pollution in Oxford. This has not been done. Similarly, the Workplace Parking Levy should apply to all such parking spaces in the City. The Universities and Colleges must be pressed to reduce their car parking to drop off-pick up & maintenance vehicles only. Other major employers must do likewise. The City Council should consider its car parks for their social and keyworker housing potential with minimal parking at the base of new buildings and many sites having car free covenants on apartments with no allocated space for parking for the residents.
2. **Health cost implications of slow adoption of air pollution alleviating policies:** The costs of slow implementation on public health should be quantified and emphasised at part of the need to secure radical reductions in air pollution no later than 2030 for the City as a whole. It is important to identify the cost implications of continuing to have significant PM emissions with little abatement envisaged, whilst NOx emissions are being reduced.

**Comments on the consultation document:**

We reiterate that the Pilot should be the Red Zone, as a preliminary step for a zone covering the City as a whole, in the interests of public health – and in support of active travel. We are concerned about resources for the County Transport Plan, of which the ZEZ is part, given the wholly inadequate tax base the current Chancellor is choosing to work from. Local Government quite simply needs to go into campaigning mode to obtain the resources to meet local needs, including for active travel (1.9) and in recognition of 6% of deaths in Oxford being as a result of air pollution (1.11).

We note, that (1.15) road transport accounts for 16% of carbon dioxide emissions in Oxford. We would like to see a more integrated air pollution strategy including emissions from buildings, emissions from peatland being allowed to dry out in the City and aviation both civil and military which overflies the City. Since South Oxfordshire DC has a 2030 target for its greenhouse gas emissions resulting from its entire area, a holistic approach would marry air pollution and Climate Emergency concerns.

Point 1.19, makes a distinction between the proposed Zero Emissions Zone and the London Ultra Low Emissions Zone. There are several problems with this. A ‘Zero Emissions Zone’ is a public relations terms when exemptions for some vehicles entering the zone are planned. It is also a perversely confusing term giving the impression that more is to be done as far as the public is concerned than is actually the case. We would prefer the strictly accurate ‘Ultra Low Emissions Zone’ to be the term for the Zone.

Point 3.8. We do know, from LTNs as in Walthamstow, that resident and business support for traffic reduction measures rises after implementation of such schemes. The primary issues for business include both the Covid 19 recession and the predicted negative effects of Brexit, adding to adverse trading conditions. The suggested public sector pay freeze, supported by the Chancellor, would certainly make things worse for retail and service outlets in the City Centre and beyond; online shopping continues to rise relentlessly as well. We feel it is important to separate general business concerns about Government policies which appear to be worsening recession, and the impact of online shopping, from any real effects from an Ultra Low Emissions Zone. Better active travel networks could help the City Centre if embedded in the so-called ‘Zero Emission Zone proposals, assisting footfall.

3.9 If the City Council is serious about reducing traffic in Oxford, it has to cut parking spaces to encourage stronger move towards active travel and public transport. Government discouragement of the use of public transport during the Covid 19 crisis has been inept, promoting vehicle use increases that are observable on some routes. The City Council must consider how it could promote electric car hire over car ownership in order to put downward pressure on car journeys inside Oxford.

Table 2:

Deliver ZEZ for full proposed zone, as Pilot for the whole City. This should be extended year by year and have complete City coverage by 2030. This coincides with the date set for ending sales of conventional cars.

Agree with council approach to Blue Badge holders. It is, however, difficult to see how people with disabilities but without a Blue Badge are to be accommodated without some form of costly assessment. This idea should be rejected because it will have high cost implications.

Concerning the wait for better emissions standards for vans and lorries, it would be best if the City went into a permanent promotional phase of encouraging use of cargo bike companies. Online shopping increases have led to a proliferation of delivery vehicles on all types, including both small vans and even cars. It is better to have cargo bikes with the cycle networks to support them. All City Centre traders, and in particular the Covered Market, should be introduced to cargo bike enterprises.

Table 4 – proposed charges

These charges are all too low. In particular, the final category: ‘any vehicle not meeting the above standards.’ The charge for this should be at the same level as a fine eg £60/£120 It is objectionable that HGVs in particular as highly polluting vehicles taking up considerable amounts of road space should pay so little. The charges should be creating an incentive for distribution companies to use cargo bike enterprises. Non-residential ‘clean air’ cars should also pay more, to reduce car journeys in the Central area of Oxford – and eventually, with a City wide Zone, in the City as a whole.

Table 6:

Permanent discounts need not include historic tax class vehicles.

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1. See for example: <https://www.transport-network.co.uk/Sunak-considers-road-pricing-to-plug-tax-gap/16967> [↑](#footnote-ref-1)
2. See, under Reports, Electronic Road Pricing for Oxford: [www.catg.org.uk](http://www.catg.org.uk) [↑](#footnote-ref-2)
3. #  Information from Professor John Whitelegg. Re: Non-exhaust PM emissions from electric vehicles” Atmos. Environ. 134 (June 2016) 10–17] Authors: Victor R J H Timmers and Peter A J Achten

 [↑](#footnote-ref-3)