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**ANPR consultation – Cowley and environs re LTNs**

1. **The role of ANPR:** We object to ANY substitution of ANPR for bollards in locations previously decided. In areas of highest reported vandalism of LTN infrastructure, ANPR with physical barriers should be normal practice. We do not accept the re-opening of three installed filters as suggested in this consultation. We are not aware of an evidential basis for this change.
2. **Risks:** ANPRwithout barriers will not be clear to drivers, especially if extensive exemptions are permitted. There should be a consistency of very limited absolutely essential exemptions to traffic filters including on the 6 major roads suggested. Driving into an area without heeding the presence of a filter as there is no physical barrier could lead to accidents with pedestrians and cyclists. Of course, the immediate response to any such accident will be calls to bring back any removed barrier. So, it is best to approach this topic on the most economical basis for the long-term: keep the barriers, make the message to motorists very clear.
3. **Traffic projections necessitate major road traffic reduction efforts NOW:** As cyclists, we are very familiar with all of areas covered in this consultation, riding through these areas during every month of the year. We note that the DfT is predicting the following in terms of traffic projections:

“Traffic levels in England and Wales are projected to grow in all our scenarios, but  
with large variation around the size and trend of that growth. From 2025, traffic is  
projected to grow between 8% and 54% by 2060 (Figure 9). Consequently, delay is  
projected to increase by between 6% and 85% from 2025 to 2060. This is measured  
as average delay per vehicle per mile in seconds.”[[1]](#footnote-1)

However, we know of no evidence the DfT has become willing to accept the induced traffic effect of new road infrastructure.[[2]](#footnote-2) Essentially, the additional trunk roads the Government continues to build mean more and longer car journeys in particular.[[3]](#footnote-3) Also, theoretical housing completions intended for Oxford and nearby areas of neighbouring local authorities make it highly likely that traffic increases in Oxford itself, particularly with increased inward commuting, will be at the higher end of DfT projections. No amount of new trunk road building, which we oppose in principle, is going to compensate for the fact that existing Oxford cannot cope with even more traffic. All Oxford junctions have been at or over capacity usage in the rush hour-school run periods since at least 2017. Consequently, traffic reduction measures must be maximised year on year, without delays. We disagree with the delay in implementing Traffic Filters on the 6 major Oxford roads identified in a previous County consultation. We agree with the Oxfordshire Liveable Streets petition that the Botley Road closure should not delay Traffic filters elsewhere in Oxford.[[4]](#footnote-4)

1. **Buses, ANPR and fares:** ANPR alone without bollards is needed for Traffic Filters on bus routes.[[5]](#footnote-5) Bus services may continue to shrink unless radical remedial action is taken, reducing the need for ANPR in practice in some locations. We note that research suggests £6bn a year could produce free buses and enough resources to continue introducing electric ones.[[6]](#footnote-6) We urge that the County Council add its voice to a call for free buses, and also for a national level freeze on trunk road building indefinitely, to ensure the funds are available for this.
2. **The Active Travel context:** We note that the Government’s extraordinary cuts in the Active Travel budget[[7]](#footnote-7) undermine the necessary process of road traffic reduction to stave off huge increases in traffic during coming decades. Therefore, bearing in mind the exceptionally challenging Oxford context, the County Council must lead on traffic reduction bravely and with foresight of the consequences if they do not make rapid progress. Oxford Mail reporting on LTNs is highly misleading about public support for traffic reductions. A widely reported study suggests 60% of the public are pro-LTNs. Similarly, no candidate was elected on an anti-LTN ticket in the last local elections in Oxford or a subsequent joint City and County by-election in the Littlemore/Rose Hill area.
3. **ANPR and exemptions:** we think proposed exemptions, eg for suggested Traffic Filters seem too generous. We want to see a case by case assessment for some of the exemptions suggested, especially vans. Vans which are delivery vehicles in the City should be replaced as far as practically possible by cargo and ecargo bikes. The volume of construction vehicles in Oxford needs investigation, with a search for practical reductions in numbers. We note the extraordinary number of vehicles present at times during the rebuilding process of the Bullingdon Community Centre on Peat Moors in Lye Valley; we note the parking of many vans on the Cornmarket during a lengthy period of construction: we are concerned that use of vans is in fact really a form of car use in some cases, and that cargo and ecargo bikes can substitute in some cases to reduce traffic volumes. We also note the physical problem of the parking of vans on pavements. We urge the County to call upon the Secretary of State for Transport to implement a national Pavement Parking ban, and failing this allow one for Oxford. London has banned pavement parking already, and Scotland will be following. We think that this could contribute to reducing avoidable van use, and reduce vehicle damage to pavements which, like roads and cycle routes, go for very long periods without repair or maintenance.
4. **ANPR and fines:** It is clear from the experience of the Traffic/bus filter arrangements for Oxford High Street, that many people drive into the penalty zone regardless of fines. This means traffic reduction is not being achieved. Users of the Cornmarket will from time to time see some car drivers attempting to proceed through the Cornmarket, demonstrating a need for more rising bollards. We are concerned relying on ANPR alone in any LTN area will permit some vehicle users to carry on making avoidable journeys regardless of penalties.
5. **School run:** We want the school run to be: walking, cycling with parents and bus use. Anything which allows continued through traffic in the busiest areas during the school run times needs addressing – perhaps through a more assertive approach from the County about individual Green Travel Plans for schools having higher and more challenging objectives. Traffic filters that many vehicles have exemptions for is problematic; traffic filters without physical barriers should be minimalised in Oxford as a matter of principle as non-exempt vehicles may frequently pass through them, as on the High Street. So ANPR has a role in dealing with this type of problem, but in the context of strong and united political leadership from the County.

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1. DfT – National Road Traffic Projections 2022, p.26: <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1123542/national-road-traffic-projections-2022.pdf> [↑](#footnote-ref-1)
2. SEE: Standing Committee on Trunk Road Assessment – Trunk Roads and the generation of traffic, 1994: <https://www.thenbs.com/PublicationIndex/documents/details?Pub=DOT&DocID=258178> [↑](#footnote-ref-2)
3. There is at least 14 years of road repairs outstanding due to the continuation of new trunk road building; pavement repair backlog, given no pavement parking ban, may well be significant too. [↑](#footnote-ref-3)
4. <https://oxlivsts.org.uk/petition/> [↑](#footnote-ref-4)
5. Although bus services have been cut and passenger usage has dropped by about one third over the last decade. We fear the consequences of further decline in bus usage. SEE: Oxford Mail, 24th February 2023: <https://www.oxfordmail.co.uk/news/23342790.bus-journeys-oxfordshire-fall-third-last-decade/> [↑](#footnote-ref-5)
6. Advice of Professor John Whitelegg. [↑](#footnote-ref-6)
7. See for example, the response of Sustrans: <https://www.sustrans.org.uk/our-blog/news/2023/march/sustrans-responds-to-active-travel-funding-cuts-in-england/> [↑](#footnote-ref-7)