



19th July 2023

By e-mail only

Attn: [Redacted information]

[Redacted]

Director for Environment & Place
Oxfordshire County Council
County Hall
New Road
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Dear [Redacted],

Ref.CM/12.6.320 East Oxford Low Traffic Neighbourhoods – Permanent Arrangements - Statutory Consultation

1. The Background to the current situation

City of Oxford Motor Services Limited (trading as Oxford Bus Company) and its sister company Thames Travel (Wallingford) Limited, and Thames Transit Limited (trading as Stagecoach West) collectively operate the majority of the commercial bus mileage in the City of Oxford, and its immediate vicinity: that area extending to Kidlington, Kennington and Wheatley that benefits from multi-operator service coordination and ticketing under the Oxford “Smartzone” brand. As well as the dense and frequent city network, a comprehensive range of longer-distance services extends beyond the Smartzone boundary to cover much of Oxfordshire and beyond, operated mainly by Stagecoach and Thames Travel.

Thus, the effects of any traffic management undertaken on the east side of the city affects the great majority of our operations directly, and the majority of the remainder indirectly – given that most of our services operate from depots at Watlington Road and Horspath Road on the south east of the city, and many routes under normal circumstances operate across the city centre.

Given our very great interest, we trust that you and your officers will recognise that we have engaged duly, proactively and constructively in the genesis of the

Low Traffic Neighbourhoods initiative (LTNs) since their inception as a County Council policy priority for implementation.

It must be stressed at the very outset, that the Council has always promoted the LTNs as part of a package of radical measures to restrain car use within the Oxford City Ring Road. We would, again, reiterate our strong support for the broad intent of these policies, which are collectively referred to by the Council as the Central Oxfordshire Travel Plan (COTP). Of these, the Low Traffic Neighbourhoods forms a significant component. In essence, COTP envisages the near-complete removal of motorised traffic from the inner areas of the city, the very rapid replacement of remaining motor vehicle movements with battery-electric power, and a large-scale substitution of shorter car-borne journeys within the City by walking, cycling and bus.

Our commitment as the largest bus operators in the City to this ambitious strategy is very evident in over £45m that we have committed from our own resources to entirely replace with 159 battery-electric vehicles, our existing, modern and high-specification bus fleet operating entirely within the SmartZone. Acknowledging that this investment is supported by HM Treasury and by the County Council, it remains by far the largest single capital investment ever made in history of the City's public transport. This being the case, it comes with very significant risks.

We have been clear and consistent from the outset that the business case to make this kind of investment relied on average bus speeds within the Smartzone improving by at least 10% from a 2019 benchmark, given the whole life costs of these vehicles is substantially higher than their current diesel equivalents, even when grant funding is accounted for. The successful funding bid under the Department for Transport's (DfT) Zero-Emissions Bus Regional Area (ZEBRA) competition to make this possible, always assumed this would be achieved, and was made a condition of the provision award of funding by Government officials. Subsequently this target has underpinned the Enhanced Partnership between bus operators and the County Council, with a legally binding commitment being made by the Council to achieve this target by March 2025.

The Low Traffic Neighbourhoods initiative even considered *solus*, is a substantial and relatively large-scale intervention. Due in part to terms and conditions related to central government funding associated with the project, it was undertaken very rapidly, within the areas covered by this consultation, in May 2022, following a more localised trial around Cowley that took effect in November 2021. No notice was given to bus companies as to when the measures would be installed. The initiative has been conceived and designed with no material consideration of likely wider effects, nor modelling.

All the effects of the scheme as initially implemented have been evaluated, as far as we can tell, following implementation of the Experimental Traffic Regulation Orders.

2. Evaluating the Impacts of the Scheme

The bus operators have recognised from the outset that the nature of this kind of intervention, which has few direct precedents and which relies to a great extent on a substantial amount of behaviour change, could never be modelled in advance to a degree of realism and robustness that would make the exercise worthwhile. The Council has acted very boldly and with great conviction, given the clear practical and political risks involved. We recognise that achieving the kinds of change that the Council would like to see – and that we in principle strongly support – unavoidably involves a higher level of risk than typically most in local government would be prepared to accept. This is commendable.

Notwithstanding this, over a year after the implementation, we are unclear what measures have been undertaken by the Council to arrive at a comprehensive and robust understanding of how far the measures have achieved their positive goals, beyond the obvious one of removing all through traffic from every side street in the extensive areas covered.

We are not aware that the County has the financial resources, the staff nor the technical means to evaluate what other, more deleterious effects there have been. Nor are we aware that the Council has taken steps to quantify whether the conversion of all streets to culs-de-sac has also served to advance other key policy objectives, such as reducing the operated mileage of private vehicles within the Ring Road, increased the number and frequency of walking, cycling or public transport journeys, or reduced the average length of journeys made to meet day-to-day needs – for example convenience shopping.

Our experience since May 2022 has been that, while we have held regular discussions with Council officers to discuss the adverse impacts on bus journey times that have been evident since the introduction of the LTNs, and have discussed several possible interventions with Council officers to potentially address these, Council officers have not sought to conduct any kind of detailed or data-driven analysis of what the benefits, or disbenefits have been to bus operations, or the effects of the scheme on bus use in the City.

The Council is aware, from its work examining the case for the separate mode filters initiative that is yet to be implemented, that most of the traffic that circulates within the Ring Road starts and/or finishes its journey well beyond it. This makes it exceptionally hard to very materially reduce traffic levels within the Ring Road by substituting them with active travel journeys.

Where trips have a destination in the city centre or, to a lesser degree at the main Churchill and John Radcliffe Hospitals, a proportion of car borne journeys originating outside the city can be intercepted by inter-urban bus services, and at the Park and Ride sites. However, this cannot effectively address a wide range of more complex journey demands to a highly dispersed range of destinations within the Ring Road nor, of course, has this any relevance to steadily increasing number of freight and “last-mile” package deliveries. It has also become very apparent since May 2022 how far traffic at the busiest times is generated by schools, and in particular, fee-paying schools.

We will set out in this response what the impacts on bus operations have been, and the consequential impact on the level and quality of bus service we have been able to offer to the public. Notwithstanding the Council's recognition that a very substantial step change in bus use forms a key element of its transport strategy, the effects of the LTN implementation have been entirely detrimental to bus operations, to a degree that is probably entirely unprecedented, and certainly is within the last 50 years. This has, quite predictably, had a direct impact on bus use and on the current and potentially on longer-term sustainability of many services. In certain cases, especially after 2.30pm, a local bus journey in parts of East Oxford today takes so long to achieve that it is not a credibly relevant choice to any but the most physically infirm.

We will also outline how, contrary to clear advice we offered to the Council and its officers in October 2021 about the kinds of impacts we anticipated would arise from the LTNs as envisaged, the scheme has been advanced at great speed, in advance of other elements of the Central Oxfordshire Travel Plan (COTP). These include the Strategic Mode Filters and the Zero-Emission Zone. This being the case, the disruptive effects of its implementation have been aggravated by higher ambient traffic volumes than would otherwise have been anticipated. It is extremely regrettable that through no fault of the Council's separate works underway at Oxford Station necessitating the lengthy complete closure of Botley Road, have meant that it has not been possible to implement the Strategic Traffic Filters in the manner or on the timescales envisaged, which means that the current conditions can be expected to endure for at least the next eighteen months.

Sadly, although we have discussed several possible intervention measures with Council officers to address some of the impacts seen from the LTNs on bus journey times, we have not seen the same great speed applied to advancing these potential mitigating schemes, and at the time of writing – some 14 months after the LTNs were first implemented – no material mitigation measures have been implemented to deliver any meaningful benefit to bus passengers.

We note that the permanent scheme proposes some significant changes at key points. The published material does not explain in any way, the rationale for these changes or the evidence that is being used to justify them – though broadly we are supportive of them in and of themselves.

Therefore, in our judgment, the Council cannot at this stage make a clear case to state that the LTNs have been successful and therefore progress with a plan to make the scheme permanent in the manner proposed.

Rather, the introduction of LTNs and their permanent confirmation in the manner proposed, leaves the County in the very uncomfortable position that they have directly caused bus services across the bulk of Oxford to become substantially slower, even less reliable, and as a result have further substantially reduced bus patronage and mileage, seriously aggravating the challenges caused by the COVID crisis.

All this puts the Council in breach of the contractual commitments we have agreed under the Statutory Enhanced Partnership, that puts into effect the Bus Service Improvement Plan for Oxfordshire. It also leaves the viability of one of the UK's most ambitious zero-emission bus schemes in a quite questionable position, and in breach of the funding terms for substantial capital grant from the DfT. This is a truly grave position.

3. The Snapshot Monitoring Report

The Monitoring Report published by the Council on June 6th 2023 is the first published material that sets out quantifiable impacts of what is one of the most significant traffic interventions seen in the city for many years.

It makes no attempt to include data on average bus journey times and speeds, or variability in bus journey times and speeds. Given the known severe impacts that we have raised with Council officers and senior members at the very outset, and subsequently since, it is a great concern that the public is being asked to consider the LTN proposals without a fully informed picture of what the effect has been on all non-car modes.

Of all the effects on congestion, queuing and bus operations, those that have been encountered from the outset at the northern ends of Iffley Road and Cowley Road, and on the approaches to St Clements as these three key public transport corridors converge on The Plain, have been by far the most severe, most enduring and most disruptive.

Paragraph 4 of the Monitoring Report offers an important insight into the cause of this:

*“In both instances, prior to the introduction of the LTNs (during the period between November 2021 and May 2022) the sensors further away from the city centre recorded significantly higher traffic volumes than those closer to the city. After the introduction of the LTNs on 20th May 2022 the gap in volume has closed (completely in the case of Cowley Road and significantly for Iffley Road), **due to large increases in traffic near The Plain**, and sizeable decreases in traffic at locations further from the City Centre. Further analysis is required to fully understand this pattern.” (our emphasis)*

This is not a surprise to us, nor do we believe it should greatly surprise the Council.

As we broadly predicted in our letter to you in October 2021, the complete removal of all permeability from the network for vehicular traffic, apart from at either ends of these radial corridors, makes it entirely rational that traffic will reassign around the LTNs on these radials **exactly as the scheme intended. In so doing this traffic is added to a very small number of key junctions, that are already subject to very high degrees of pressure and conflict.**

The Plain stands out as that junction where the most radials converge, where geometry is extremely constrained, and where there is also an exceptionally large volume of cycling as well as vehicular movements.

The result is exceptional levels of queueing, that backs up the radial routes a considerable distance to the south and east. All of the five key radial corridors to the east and south-east of the city are affected particularly after 2.30 pm. As you and your officers are well aware, these corridors are each used by key, high-frequency bus services.

Table 3 of the report reveals that **traffic levels at the northern ends of Iffley Road and Cowley Road have grown on an adjusted basis by 33% and 65% respectively¹**. This can only be described as a huge increase in traffic levels on key public transport corridors – higher than even we anticipated.

If the intention of the measures was to reduce the impact of car traffic on mobility, and the public realm, it must surely be judged to have failed, and seriously so.

It should be stressed that these figures are a result of monitoring throughout the day, and that these figures, if anything significantly understate the impact seen at peak times, when traffic speeds are now so low on these roads owing to the saturation at and around The Plain, that traffic throughput has reached a cap at these times. We find it notable that the Report makes no attempt to quantify impacts on St Clements and the knock-on impacts on either Headington Hill and Marston Road, which are not directly adjacent to the LTN areas. This too has been exceptionally severe – as we will discuss in a subsequent section.

Walking has if anything reduced on most of the radial routes, to a degree that is more surprising, albeit the effects are hard to fully read, given the number of sensors is so few. Notwithstanding this the intention of LTNs to make walking more attractive has not been achieved; rather the evidence suggests that the contrary is true.

It is no surprise to us of that the only route on which there has been an increase in walking it is on Morrell Avenue. This is significant albeit from a relatively low base, rising from an average of 350 per diem to 515 per diem. We would say this is very likely to reflect **the effects of the LTN implementation on the service 15 bus corridor operating along the Morrell Avenue. These have been among the most severe of all the routes involved – a point we had highlighted to the Council and its officers from a very early stage.** This effect has been the most pronounced during the afternoon and evening peaks, in that bus journey times have become so extended, and as a result, timetable frequencies so reduced, that there has been a greater than 50% drop in one-way seat availability between Churchill Hospital and the city centre after 3.30pm; and compounding this, for those journeys, it is actually quicker on many occasions to walk into the city centre, so slowly does the bus progress.

¹ +25% on Iffley Road North and +57% on Cowley Road north on a crude unadjusted basis.

It is hardly surprising in these circumstances that significant numbers of former bus passengers are walking, an effect that is well evidenced where bus speeds in London have reduced to similar levels. This statistic, amounting to **an average of 165 one-way pedestrian journeys per day, credibly can be entirely explained by mode shift away from bus.**

The statement at paragraph 27 made by the Council’s authors ascribing this to people walking further to their parked cars cannot be correct as there is insufficient density of sensors to have picked up this effect. In fact, entirely too few car parking spaces were removed to create an effect of this magnitude.

Only cycling has seen a significant increase. This is again expected, especially when one considers that the implementation of the improved conditions for cycling along the arterial routes under the “Quickways” initiative was reinforced by the greatly improved conditions for cycling along side streets as a result of the removal of through traffic, which we have to acknowledge was one of the key objectives of the LTN project.

It is also quite possible that greatly extended bus journey times have led to a substantial increase in cycling as a result of mode shift from bus. Of all modes, bus has probably been the most seriously damaged by the way the LTNs have been put in place. However, **the Monitoring Report makes no attempt to quantify the effect on bus services.** We will address this serious deficit in the evaluation and consultation material in the next section.

4. The impact of the East Oxford LTNs on Bus Operations

4.1. Journey time

The data shown in the table below reflects real time data from Oxford Bus Company and Thames Travel services over the period 19th February to 18th March 2023, compared to the equivalent baseline pre-LTN period of 20th February to 19th March 2022. Data is shown for each of the key corridors converging on the Plain Roundabout, covering the area affected by the East Oxford LTNs.

Trip	Pre-LTNs			Post-LTNs		
	Average	Min	Max	Average	Min	Max
Cowley Centre to Queens Lane via Cowley Road	16.17min	10.30min	22.65min	17.47min (+8.0%)	10.76min (+4.5%)	25.20min (+11.3%)
Headington Shops to Queens Lane via London Road	11.22min	7.24min	15.24min	12.99min (+15.8%)	6.69min (-7.6%)	29.15min (+91.3%)
Wood Farm to Queens	19.09min	12.74min	24.42min	21.91min (+14.8%)	12.82min (+0.6%)	37.39min (+53.1%)

Lane via Morrell Avenue						
JR Hospital to Queens Lane via Marston Rd	20.35min	13.83min	26.42min	23.50min (+15.5%)	12.39min (-10.4%)	45.36min (+71.7%)
Rose Hill Parade to Queens Lane via Iffley Road	13.67min	9.72min	22.71min	13.95min (+2.0%)	8.47min (-12.9%)	26.31min (+15.9%)

It is apparent from this data that in all cases, average running time has substantially increased. Modest increases were seen on the Iffley Road, with much more severe increases seen on the other corridors. Those routes converging on the St Clements area are particularly badly affected, with increases in excess of 15% on average being seen.

Moreover, the variability of journey time has also become much greater since the implementation of the LTNs. While minimum journey times have overall been broadly unaffected, and in many cases have actually improved, maximum running times have increased dramatically on all corridors, and have almost doubled on some routes. This is of crucial importance, as the achievable “peak” running time is what drives the requirement for vehicle and driver resources and so bus operator costs.

It also indicates, and reflects, that the variability in journey time for any given scheduled trip has also increased. This has an even more damaging impact on the public experience of bus use. As well as bus journeys becoming much slower over most of the day, they are also generally more unpredictable. A sample of these effects is set out below:

Trip	Pre-LTNs			Post-LTNs		
	Average	Max	Variance	Average	Max	Variance
Cowley Centre to Queens Lane via Cowley Road 0725	19.5min	28.4min	8.9min	25.0min	32.0min	7.0min
Headington Shops to Queens Lane via London Road 1600	13.2min	24.7min	11.5min	29.2min	39.9min	10.7min
Wood Farm to Queens Lane via Morrell Avenue 1600	20.5min	25.0min	4.5min	37.9min	51.3min	13.4min
JR Hospital to Queens Lane via Marston Rd 1610	26.4min	49.7min	23.3min	43.0min	63.9min	20.9min

Rose Hill Parade to Queens Lane via Iffley Road 0750	22.71min	33.1min	10.39min	25.3min	40.1min	14.8min
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The table above makes uncomfortable reading. It reflects some of the worst affected journeys on the corridors concerned. Notably, these are all at peak times. It makes plain the significant deterioration in **average** bus speeds at these times. The variation around this has, in some cases, reduced, but only because the average speed has been so seriously and chronically impaired. As far as the customer is concerned, the kinds of journey times that can be experienced *having boarded the bus*, are so long as to be entirely exasperating, and in many cases are little different, or slower than a comfortable walking speed to make the same journey.

When the absolute difference in running time from the average is considered, it can readily be deduced that it is practically impossible to maintain a regular frequency or reliable operation, despite the greatly increased scheduled running times that we have put in place. As a result, customers are presented with extended and entirely unpredictable waiting times at bus stops. This combination of unreliable time of arrival at the stop, as well as a long and equally unpredictable journey time, is the single biggest area that dissuades bus use. Years of customer surveys, nationally, including those undertaken by Passenger Focus, make plain that the public values most highly more reliable, then faster bus journey times.

Put very simply, **the sample statistics set out above offer a clear picture of how far the introduction of the East Oxford LTNs has compromised the value offered by the bus to the public.** We consider it credible to suggest that this damage exceeds that experienced by use of any other mode – including, perversely, private car use.

We should end by highlighting that the maximum running times observed have generally been seen in the morning and evening peak periods: when the greatest number of bus passengers would want to travel. It is apparent that the offer we are able to provide to passengers has materially worsened at the time of greatest demand, and where the potential for mass transit to achieve a full range of transport and social policy goals ought to be the highest.

4.2. The effect on the timetabled offer.

The Transport Act 1985 (as amended) requires duly-licensed operators to operate their services reliably, within a window that does not permit buses to run more than 1 minute early or 5 minutes late. It is incumbent on us therefore, to ensure that the timetable can realistically be operated. This is also in and of itself important to properly manage customer expectations.

Following the implementation of the LTNs in May 2022, there was an immediate and profound collapse in service reliability and bus productivity across East Oxford. Between this point and July 24th 2022, some of the severe difficulties were thought to be attributable to over-running works at Magdalen College,

affecting city-bound traffic at the western end of Magdalen Bridge west of The Plain. Experience has shown that this was not the major component of the cause. As you will recall, we formally approached the Council's officers at a senior level, alongside the Portfolio Holder, in writing, in June and then July 2022, to raise our deep concerns and requesting a meeting to discuss the matter urgently. We finally met in August and were assured that measures to mitigate the difficulties would be urgently considered, but that the scheme must stay in place. We were also exhorted to be patient while behaviour change adjusted to the scheme and could be expected to reduce some of the initial "teething troubles".

By November 2022, it was quite apparent that any significant amelioration of conditions as a result of behaviour change was not foreseeable. In the absence of any material movement on the part of the Council to identify and implement mitigation measures, in line with the clear explanations we gave in the Summer of 2022, we were left with no other recourse than to very substantially alter our timetables to reflect the traffic conditions we have been typically encountering, not least to remain legally compliant.

This has meant rescheduling all our Oxford City operations taking effect from January 2023, and in particular in East Oxford, to reflect much slower operating speeds. As a result of the great reduction in bus productivity, the level of operated mileage per vehicle reduces substantially, with these reductions being particularly concentrated at peak times, when the greatest number of people wish to travel. Without adding significant additional resource to the system at very great and unsustainable cost, aggravated by recent difficulties in maintaining driver establishment, this has unavoidably led to significant frequency reductions, especially in the afternoon and early evening.

The key changes we made were as follows:

- Cowley Road: Average scheduled run time on services 1 and 5 was increased by 7%, from 17.4 minutes to 18.6 minutes. Maximum scheduled run time was increased 9%, from 23 to 25 minutes. Service frequencies were reduced accordingly, as with the reduction in patronage it was not possible to increase resources.
- Morrell Avenue: Service 15 was reduced in frequency from every 12 minutes to every 15 minutes (pre-COVID a 10 minute frequency was offered), with afternoon peak journey frequency reducing to every 25 minutes. The average scheduled run time from Wood Farm to Queens Lane was increased 12%, from 19.5 to 21.8 minutes, with the maximum scheduled run time increased 67%, from 24 to 40 minutes.
- Service 9 to Risinghurst was withdrawn and needed to be replaced with a Council-funded replacement. This took the form of the extension of an entirely different service via JRH and Summertown to the town centre, involving a much longer journey to the city centre and greatly increased journey time. In the Council's tender document for the replacement service, it was stated that *"the current running times are no longer achievable after about 1500 on journeys heading towards Oxford City Centre due to congestion in the St Clements area. It is recommended*

*that any journeys via St Clements are scheduled at **up to** every 90 minutes at these times, but tenderers may wish to check publicly available tracking data.*” This demonstrates the awareness of some in the Council, of how serious problems on the London Road route have become

- Marston Road: service 13 was withdrawn, leading to a 50% reduction in daytime frequency from every 10 minutes to every 20 minutes. Maximum scheduled running time was increased 45%, from 22 minutes to 32 minutes.

These cuts in service levels compound the reductions that were necessary following a permanent reduction in bus use at peak times that followed changes in working practices, in particular by local government, during and after the COVID-19 pandemic. It should be obvious that, at a time when we have been trying to rebuild confidence in the relevance of bus to daily mobility across the City and County, in the face of other wider challenges, we strained every sinew to avoid this outcome.

This action clearly runs entirely counter to our shared objective to improve the quality, attractiveness and relevance of bus services.

Despite these changes, punctuality on several key services remains well below an acceptable level. For example, despite much increased scheduled running time, extreme variation in running time day-to-day means that Stagecoach service 10 is currently operating at broadly 70% punctuality, despite extensions to scheduled running time: a level which is not sustainable. This indicates that further increases in timetabled running time (and consequential worsening of timetabled frequency, and extension of point-to-point journey times) will be needed in the near future to address the situation, such as OBC has had to apply to Service 15.

4.3. The effect on bus patronage

It again should come as no surprise, that these effects have had a significant effect on bus patronage and revenues. At a time when buses need to be offering a more credible choice, to more people, for many more journeys that are currently undertaken by car to meet the Council’s policy ambitions, we trust that this will alarm the Council as much as it does us.

Without a vibrant bus operation within the City, at the heart of the County, we also need to stress there are wider and longer-term risks that the many years of gradual and steady development of the extra-urban bus service offer, one of the best in the UK, is also likely to be further jeopardised.

In total, bus patronage in Oxford city remains more than 5% lower than was seen prior to the COVID-19 pandemic across the board. On some of the worst affected corridors, we have seen reductions in patronage since the implementation of the LTNs, with some of the most serious examples being shown below:

- Marston Road – 27% reduction
- Morrell Avenue – 10% reduction
- Cowley Road – 5% reduction

The baseline for this data is June 2022. This is a full 6 weeks **after** the initial implementation of the East Oxford LTNs. As such, this is likely to underestimate the full reduction in patronage caused by the LTN scheme. Moreover, these effects can be considered to be permanent, as unfortunately they appear to represent a steady-state situation.

Furthermore, over the same period we have seen a steady and continued increase in bus patronage across our wider bus network, both in Oxfordshire and in surrounding counties, supported by a steady to return to workplaces for office workers who moved to hybrid or fully home working during the pandemic, and the introduction of stimulation measures such as the government’s £2 bus fare cap scheme. It is therefore indisputable that a serious adverse impact has been seen on bus patronage in Oxford city and that this can be linked back to the introduction of the LTNs.

When compared to journey times from before the COVID-19 pandemic, the picture is similar, though not identical - due to the impact of changed working and travel habits seen following the pandemic. For June 2023, the Go-Ahead companies recorded a 3.2% overall **reduction** in average bus speeds within the Oxford SmartZone area when compared with June 2019, as measured by the “CitySwift” journey time tracking tool which has been jointly commissioned by the bus operators and the County Council. When drilling into individual routes, an 11.0% reduction in speed has been observed on service 8 over the same period, with an average of 67% worsening in the journey time between the Glebe Street and St Clements’ Street stops having been seen.

4.5 The effect on bus operator’s finances

The impact of the issues noted above has been threefold: Firstly, revenue has reduced as a direct consequence of the reductions in patronage noted above.

Secondly, the unit cost of operation has increased substantially, due to the reduced productivity of the vehicles in the post-LTN traffic conditions observed – the exact opposite of what is intended, and indeed committed to be achieved if the electric bus transition is to be sustainable.

Thirdly, and perhaps most importantly, the parasitic costs of operation, primarily related to crew reliefs and changeovers, have increased even more greatly than the unit operational costs. The travel time required to move drivers from depot sites on the East of the ring road to ensure they are ready to start duties punctually in the city centre has increased by a still higher factor. This has reduced bus driver productivity significantly, with an ever-greater proportion of the working week spent travelling to and from relief points. This, alongside the much greater increase in stress during shifts, has also had a serious knock-on impact on the attractiveness of bus driver roles in Oxford to the workforce, with

both bus operators consequently experiencing challenges over staff recruitment and retention, despite having implemented double digit pay rises.

All of the above has the effect of very substantially reducing bus operators' financial returns.

Naturally, without decisive and effective action to reverse the current situation, this can be expected to severely limit our ability to be able to invest in improvements to the bus fleet and service network in future, as we still would wish to do. This kind of investment is essential to securing the mode shift to bus that is required to meet the Council's own ambitious transport policy objectives. At this writing, there is no credible alternative source of funding for this kind of investment, certainly on the scale required to meet the County's LTCP5 goals in the City and across the wider County.

5. The Permanent LTN Scheme

In reviewing the proposals that form part of this statutory consultation, we confirm that we understand that the Council is somewhat tied to a process defined in law which is not amenable to adjustment. The use of Temporary/Experimental Traffic Regulation Orders to effect the LTNs over an 18-month window means that, should the Council elect to make the scheme or any part of it permanent, it needs to have consulted on any changes a significant period before the T/ETRO expires. That explains the nature and timing of this consultation.

We understand that in consulting on a permanent LTN scheme, this should not be read as confirming implicitly or otherwise that any decision has been taken by the Council to implement this scheme. However, the alternative to making the scheme permanent, in the way proposed, is its complete removal. We equally well understand why the Council would nevertheless wish to avoid this outcome.

Nevertheless, as a result, the Council is faced with an extremely limited set of choices at this stage; and this was understood by officers at the outset.

Recognising this ourselves, partly explains why in our joint letter of October 2021 to you, the City's bus companies expressed our broader concerns about the timing and nature of the then-emergent LTN proposals. We were concerned that in implementing a scheme so radical, at such speed and in advance of wider strategic measures to reduce traffic through the Strategic Traffic Filters, not only the LTN programme but the entire COTP strategy could well find itself seriously jeopardised; potentially irrecoverably.

The scheme under consultation includes a number of relatively minor modifications.

These largely involve increasing the level of permeability for authorised vehicles only, between Cowley Road and Iffley Road and *vice versa*, and between Cowley Road and Morrell Avenue and *vice versa*. This is achieved by

converting three physical barriers to ANPR/CCTV controlled restrictions, at Magdalen Street and Divinity Road. No rationale is given for these changes. We presume the main reason is to effect more direct and reliable access to and through the area by the emergency services.

However, these changes do, at least, provide some limited scope to introduce some kind of demand-responsive bus service in the future in this area should the Council wish to fund it, as part of the wider COTP package. It is likely that a small number of additional such filters would be required, both within the East Oxford LTNs and additionally around Cowley, if this is to credibly be facilitated. We suggested exactly this in previous input to the Council. It is important we record a view that this is a positive step, for this and other reasons. We must also stress that it is insufficient, given the wider effects of the LTNs both today and as proposed.

The only other change is severing Jeune Street to traffic and making it two way to address a particular localised issue, which no doubt reflects intense driver frustration in the St Clements and Lower Cowley Road area caused by the scheme itself.

In all other substantive respects, the scheme remains in place as today, when the topology of the street network available to motorised traffic is analysed. Therefore, it is impossible to conclude otherwise, than that the effects we see on traffic conditions and, by extension, on bus operations, can be expected to be in any respect greatly different than those we see today, if the Council chooses to implement these proposals for the permanent TRO.

We do concede that over the next 12 months there might be some further behavioural change - most likely towards cycling. However, given that the bulk of traffic in the area is known to originate substantially outside the Ring Road, and that it persists despite acute and chronic congestion, this strongly suggests that the vast majority of drivers consider that there is no realistic alternative than to maintain their current behaviour. Thus, any further increase in cycling is rather more likely to arise from current bus passengers, not from cars and van traffic.

Further long-term reduction in bus patronage runs entirely counter to the County's transport strategy. In fact, a substantial increase in like-for-like boardings on the 2019 baseline bus network is necessary merely to sustain the costs of operation of the battery electric bus fleet to which operators have committed. A very marked further uplift is needed to achieve the wider mode shift needed in the Eastern Arc, particularly at peak times, associated directly with the major hospitals and workplaces that lie outside the city centre, where the share for sustainable modes is currently very low.

Thus, we conclude with regret, first, that the implementation of the current East Oxford LTN schemes have been a failure in almost all respects, including in its own terms. It furthermore severely jeopardises rather than supports, the achievement of the Council's wider transport and extended social inclusion and

sustainable economic development goals – goals that the City’s bus operators remain firmly supportive of and committed to.

We also conclude that the proposed permanent East Oxford LTN scheme in all material respects is identical in its design and operation to that currently in place, certainly as far as all others affected parties than the emergency services are concerned. It is therefore quite irrational to expect it to have different effects, among many other things, on bus operations and use, that we have outlined above.

We note that there is no formal assessment of the impact of the scheme on key groups with protected characteristics under the Public Sector Equalities Duty within the Equalities Act 2010. In particular, many bus passengers are those who are unable to walk long distances, or cycle, because of physical limitations. The effect of the LTNs on these groups is clearly detrimental even when the quite limited Monitoring Report is examined.

We therefore cannot support the proposed Permanent Traffic Regulation Orders as they currently stand and therefore see little option but to submit **a formal statutory objection**.

We do this fully cognisant of the fact that doing so would in effect conclude that the only proper course available to the Council is to entirely remove the East Oxford LTNs in the short term. We are cognisant of the negative implications for this, both politically and in terms of the likely deliverability of future interventions which benefit bus passengers, for example the traffic filters scheme.

In the following section, we would therefore like to explore possible options to remove our objection and enable the scheme to remain in place while ensuring that some rapid improvements are delivered to ameliorate the current unacceptable situation for bus passengers in the city.

6. Options to move forward

In objecting to the specific scheme under consultation, we again stress that we continue to maintain strong support for the principle behind the LTN strategy: namely, that the attractiveness and convenience of sustainable modes must be radically rebalanced towards public transport, cycling and walking, from car use. Despite the current grievous situation, we also maintain our consistent support, in principle, the use of carefully considered and crafted LTN measures to achieve those goals.

Achieving this while appropriately maintaining frontage access for residents, businesses and visitors, for whom vehicular use is at times essential, requires a comprehensive but nuanced approach, that goes somewhat beyond simply removing all permeability between individual streets entirely. The approach, as we have previously urged, also needs to consider the effect both of reassignment of essential vehicular movements, and in so doing, also greatly reduce the conflicts between turning movements into and out of the arterial

roads that necessarily are likely to be subject to rather different and in places greater demands, as the current LTN scheme has already made very apparent.

As we have also stated plainly and repeatedly in the past, it looks highly unlikely that the goals of the LTN measures can be achieved when ambient traffic levels in the network remain as today. Larger scale measures already forming part of COTP to reduce this demand will be necessary, in the form of the Strategic Traffic Filters and, in all probability, the Workplace Parking Levy. We have always believed that LTNs form a key element in COTP, but that their implementation can only be achieved without serious damaging impacts, after these other initiatives have taken effect.

The impacts of the existing scheme are likely to endure for a further 6 months at least. The viability even of the current bus service offer is dependent on short-term DfT support, which has recently been confirmed to continue – albeit at a reduced level - until November 2024. Notably, in the most recent round of changes to government support funding, the mechanism used to distribute funding to bus operators has been amended to work on a per kilometre travelled basis, rather than being based on revenue losses incurred during the COVID-19 period, as was the case up to and including June 2023. This change will have a serious impact on the funding earned by urban bus services within Oxford city, directly as a result of the greatly reduced operating speeds we are encountering.

It is therefore likely that further service reductions will be unavoidable later this year. We will do all we can to mitigate these, with a positive forward view that the current highly disruptive and depressed situation will start to be resolved. We have already seen a very regrettable increase in the number of services and journeys being supported financially by the County Council over the past twelve months. This is a serious problem, not only because it will put strain on Council budgets, but also – and more importantly – because it will reduce the potential for savings made from future journey time improvements to lead to noticeable commercial network enhancements. This includes developments such as the new orbital services we had hoped to develop to support the traffic filters scheme, as it will be first necessary to “re-commercialise” services which have required temporary public support before being able to move on to such improvements.

Rebuilding bus journey times, frequencies and productivity even to a 2019 level is likely to be a challenge, and restoring passenger levels to ones that sustain that level of service with battery electric buses, represents an additional very ambitious challenge in and of itself. We have always been clear that **improvement in bus productivity of 10% over the 2019 baseline within the Smartzone is the minimum necessary to sustain the commercial operation of the battery electric bus fleet.**

The principal measure to benefit buses to achieve these outcomes is the proposed Strategic Traffic Filters, implementation of which in itself has been delayed by about 2 years, as a result of the unavoidable long-term closures at Oxford Station on Botley Road, which is having similarly severe impacts on the

bus network on the west side of the city. The STFs are also anticipated to be implemented through the same kind of ETRO process.

Given the very limited highway widths available in the city and the parallel desire to implement comprehensive segregation measures for cycling and micro-mobility as part of COTP and the LCWIP, it is very clear that mitigation measures that involve greater levels of bus priority using bus lanes will not be achievable in the vast majority of cases.

It is also far from clear that increasing signal priority for buses will have anything more than a marginal impact, and the speed at which this is being rolled out remains a matter of considerable concern. Indeed, the modelling done by the County in support of the ZEBRA business case and the STFs concludes that the best case improvement in bus productivity would be about 1.5%, and that is based on traffic conditions that pre-date the LTN effects. In near gridlock conditions, and at junctions such as the Plain which have no signal control, no positive benefit from traffic signal optimisation for buses could realistically be anticipated.

Finally, the roll out of increasingly large stretches of 20mph zones within the city - including on corridors such as Donnington Bridge Road where there is no apparent justification for such speed restrictions under the Stockholm declaration guidance – continues to have a negative ambient impact on bus journey times, which further compounds the problem.

This all underlines first, the crucial role of the STFs; as well as the importance of the WPL elements of the COTP.

In turn this raises the serious concern that, given the experience of the LTNs and the evidence of their impacts, the STFs in particular become politically impossible to achieve in practice. Avoiding this is crucial, and this evidently will need further careful consideration.

In the short to medium term, following discussions with Council Officers, we have been provided with a list of potential highways intervention schemes which may be able to be brought forward to mitigate the serious adverse impacts of the LTNs on bus journey times over the next 12 months. This list consists of the following items:

- New bus lane and parking restrictions inbound at St Clements Street, London Place and Headington Hill
- ANPR enforced bus lane/gate at the junction of Roosevelt Drive/Churchill Drive
- Cowley Road, Oxford - adjustments to kerb lines and loading/parking bays to address bottleneck near Tesco
- Cowley Centre - turning circle improvements
- Further review of on-street parking spaces focused on removal of obstructions to buses
- Review of loading restrictions and enforcement methods on frequent bus corridors

- School Streets near private schools
- Temporary peak-time signals at the Plain roundabout
- Review of 20mph zones implemented on Donnington Bridge Road, Iffley Road, Cowley Road and Church Cowley Road, as referenced in Duncan Enright's letter to Luke Marion of 12th December 2022.

We would ask the Council to urgently confirm further details on these proposals, including their likely deliverability and timescales, as soon as possible for us to consider.

It is possible, should we feel that sufficient numbers of these schemes can be delivered quickly, and achieve a material benefit for bus passengers, that we may then be able to withdraw our statutory objection to the LTN scheme being made permanent. However, time is of the essence and we will need to have this matter resolved to a satisfactory degree ahead of the cabinet meeting in October at which the permanent LTN scheme is due to be considered, **otherwise we will need to maintain the statutory objection submitted in this letter.**

Alongside this, there is an urgent need to establish how a modified approach to implementing LTNs, not only in East Oxford but more broadly, could be achieved in the short term, that secures all, and not just one, of the strategic objectives of national and County Council transport policy.

We appreciate that this represents a difficult task, but it is an essential one if East Oxford, the City and wider County is to benefit from a net-zero, socially inclusive and healthy mobility infrastructure, to which we all aspire.

We are of course ready to continue to work at pace with you and your officers in support of these efforts, as we have consistently endeavoured to do until this point.

Yours sincerely

Redacted information