



23 June 2023

Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

By email: activetraveloxfordcity@oxfordshire.gov.uk

Dear Sir/Madam

Proposed Traffic Filters Oxford City

I am writing on behalf of the Midcounties Co-operative, which operates eleven Food stores within the Oxford Ring Road. Our business has been directly impacted by the introduction of Low Traffic Neighbourhoods (LTNs) and we are urging Oxford Active and Oxford City Council to gently reconsider how the policies are being implemented.

As a Co-operative Society, we have traded in Oxford for over 150 years and we are committed to building a fair, sustainable and ethical future in the communities where we operate. As part of our award-winning approach to sustainability, we have significantly reduced our own greenhouse gas emissions, and work closely with a number of local suppliers to provide support to local businesses and to reduce travel miles. By continuing to provide opportunities for our employees and customers to shop locally, we can help to make an important contribution to creating the 15-minute City - as proposed in the Oxford Local Plan 2040.

We therefore recognise the environmental aims behind the introduction of Low Traffic Neighbourhoods in Oxford, but it is essential that these are balanced with the impacts these schemes have on shopping behaviours and people's livelihoods.

The traffic filters implemented as part of the LTNs have had a clear and measurable impact on sales and profitability of businesses in the affected area and have resulted in significant traffic congestion, negatively affecting local businesses.

Our sites at Cowley Road and Iffley Road have already suffered significant negative commercial impacts as a direct result of the current LTN measures currently in place in Oxford. The Iffley Road store has experienced a -4.6% decrease in trading compared to the previous year, while the Cowley Road store has seen a substantial decline of -21.13%. This compares to the average trading performance across non-LTN stores in Oxford of a 5% increase. While there will always be a range of factors that influence the commercial performance of individual stores, the discrepancy between the performance of Iffley Road and Cowley Road when compared to similar stores within our footprint shows that the LTNs are the single most detrimental factor.

With out action, the long term economic viability of these streets is now under question. As these impacts have been driven by the LTN policy, it is therefore clear that the Council should consider providing appropriate compensation and/ or education in business rates that reflect the reduced trading environment that now exists in the local area.

Having experienced the impact of the current LTN measures, we have serious concerns about the traffic filter trial due to its immediate effect in 2024 and how this will further compound the existing trading issues. It is essential that these effects are properly assessed and measures are put in place to compensate the businesses that will suffer from the negative impacts.

The traffic filters will clearly lead to substantial changes in traffic flows across the City and diverting traffic into the Ring Road might well advantage the large road stores at the expense of local streets.

The Street Business Impact Report Oct 2022 is, inevitably, highly speculative, and at least in relation to the impact on shopping, appears to underestimate the impact of combined trips, particularly trips combined with school runs and journeys to work. It is also very general and, even in the city-wide impact we see beneficial local streets, it is likely that the impact on some individual streets and centres would be significantly adverse. A reduction in carborne transport in Walton Street would be unlikely to be offset by an increase in local shopping by increases in visits and spend by those walking or cycling.

The limiting set out in the Traffic Filter Guidance does not seek to ease the impacts on retail and consumer services businesses and therefore does not specify where traffic flows and pedestrian/cycle counts would be limited. However, this is crucial to understanding the true impact of the traffic filters.

It is therefore essential that traffic flows in Walton Street example are limited and that arrangements are also made to limit the direct impacts on businesses during the experimental period.

While we recognise and support the aims of the LTN in reducing emissions, the approach to date is damaging local businesses and risks these areas becoming economically unviable. This intention will undermine the Council's aims by reducing people's travel in the town. It is therefore essential that businesses in the impacted areas are provided with some form of compensation to offset the negative impacts that have already been seen and that the proposed measures, including the traffic filter proposal, are fully reviewed to take into account impacts on retail and consumer services businesses.

We would welcome the opportunity to discuss these issues with you in more detail.

Yours faithfully

Redacted information